

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☒ Workplan ☐ Final Report

Name of Company: BP Production America	Contact: Steve Moskal
Address: 380 Airport Road, Suite A, Durango, CO 81303	Telephone No.: 505-330-9179
Facility Name: Gallegos Canyon Unit 307	Facility Type: Saltwater Disposal Well

Surface Owner: Fee	Mineral Owner: Federal	API No. 3004524248
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LOCATION OF RELEASE

Unit Letter L	Section 30	Township 29N	Range 12W	Feet from the 1455	North/South Line South	Feet from the 510	East/West Line West	County: San Juan
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Latitude 36.69434° Longitude -108.14706°

NATURE OF RELEASE



Type of Release: Hydrocarbons and produced water	Volume of Release: unknown	Volume Recovered: none
Source of Release: Historical impacts, likely tank overflow	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: March 26, 2018; 12:35 PM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.* During BGT closure activities, impacts were identified beneath the 45 bbl tank. Lab analysis confirms the impacts are above the BGT closure standards and spill and release guidelines with a site ranking of 20. The impacts are primarily motor oil range organics and likely and not readily mobilized in soil. BP plans to delineate via hand auger to determine extents of impacts in highly congested area of facilities.

Describe Area Affected and Cleanup Action Taken.* The area has not been fully delineated and will be delineated via hand auger in the coming weeks. Attached is a proposed workplan to perform hand auger delineation to determine if remediation of impacted soils is required.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Steve Moskal	Approved by Environmental Specialist: 	
Title: Field Environmental Coordinator	Approval Date: <u>5/31/18</u>	Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval:	Attached <input checked="" type="checkbox"/>
Date: May 22, 2018 Phone: 505-330-9179		

* Attach Additional Sheets If Necessary

NCS 1814355430

NMOCD

MAY 23 2018

DISTRICT III

8

Fields, Vanessa, EMNRD

From: Fields, Vanessa, EMNRD
Sent: Thursday, May 31, 2018 8:19 AM
To: 'Moskal, Steven'
Cc: Smith, Cory, EMNRD
Subject: Conditions of Approval Gallegos Canyon Unit 307 API# 30-045-24248

Good morning Steve,

Conditions of Approval for Gallegos Canyon Unit 307 API# 30-045-24248:

- Following the NMOCD Guidelines for Remediation's of Leaks, Spills and Releases the remediation's levels for the **Gallegos Canyon Unit 307** soils at the are as follows: 10 mg/kg Benzene, 50 mg/kg BTEX and 100 mg/kg TPH
 - BP will fully delineate the release both horizontally and vertically. Boreholes that exceeded 100ppm OVM or exhibit heavy staining and/or apparent hydrocarbon impacts will be considered impacted until sampled.
 - Delineation must be completed by June 29, 2018.
 - Provide OCD District III office 24 hour notification prior to sampling.
 - Horizontal delineation of soil impacts must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C6 thru C36). Soil sampling must be both within the impacted area and beyond.
 - Vertical delineation of soil impacts must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C6 thru C36), Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below the sites closure standards must be demonstrated as existing above the water table.
 - Composite sampling will not be allowed for delineation
 - Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples

BP Delineation Plan

To: Cory Smith, Vanessa Fields(NMOCD)
From: Steve Moskal (BP)
CC: Jeff Blagg (Blagg Engineering)
Date: 5/22/2018
Re: GALLEGOS CANYON UNIT No. 307- Soil Delineation –(L) S-30, T29N,
R12W; API #30-045-24248;

Dear Mr. Smith, Mrs. Fields

The Gallegos Canyon Unit (GCU) 307 Saltwater Disposal Well site is an active disposal well location within the San Juan Basin Gas Field in San Juan County, New Mexico. The site is located on private land with federal mineral managed Bureau of Land Management Farmington Field Office (BLM-FFO).

Background

Historical impacts were identified at the location on March 26, 2018 during the closure of a below grade tank (BGT). The impacts are likely the result of a tank overflow at the location. Initial site investigation determined additional delineation was required to define the extents of impacts. The well site is operated by BP Production.

Site Ranking

Following the NMOCD site ranking criteria, the site closure standard is 100 ppm TPH, 50 ppm BTEX and 10 ppm benzene:

- Depth to groundwater >50'<100' (10 points)
- Nearest surface water source >200'<1,000' (10 points)
- Distance to nearest water well or water source >1,000' (0 points)

Proposed Remediation – Hand Auger Delineation

Due to the configuration of the site, as depicted on the attached figure, conventional excavation or drilling is prohibited. The site will be delineated via hand auger in the accessible and practical areas of the suspected area of contamination or the suspected downgradient of known contamination at the site.

The and auguring will be performed using a stainless steel hand auger to collect soil samples at five separate points at the site, as depicted on the attached figure. The auger location at the BGT location will be advanced directionally, at approximately 45°, to obtain a sample from beneath the current fluid collection skid in hopes of determining the vertical extent of the suspected source area. The remaining 4 points will be advanced vertically in areas where facilities and infrastructure allow.

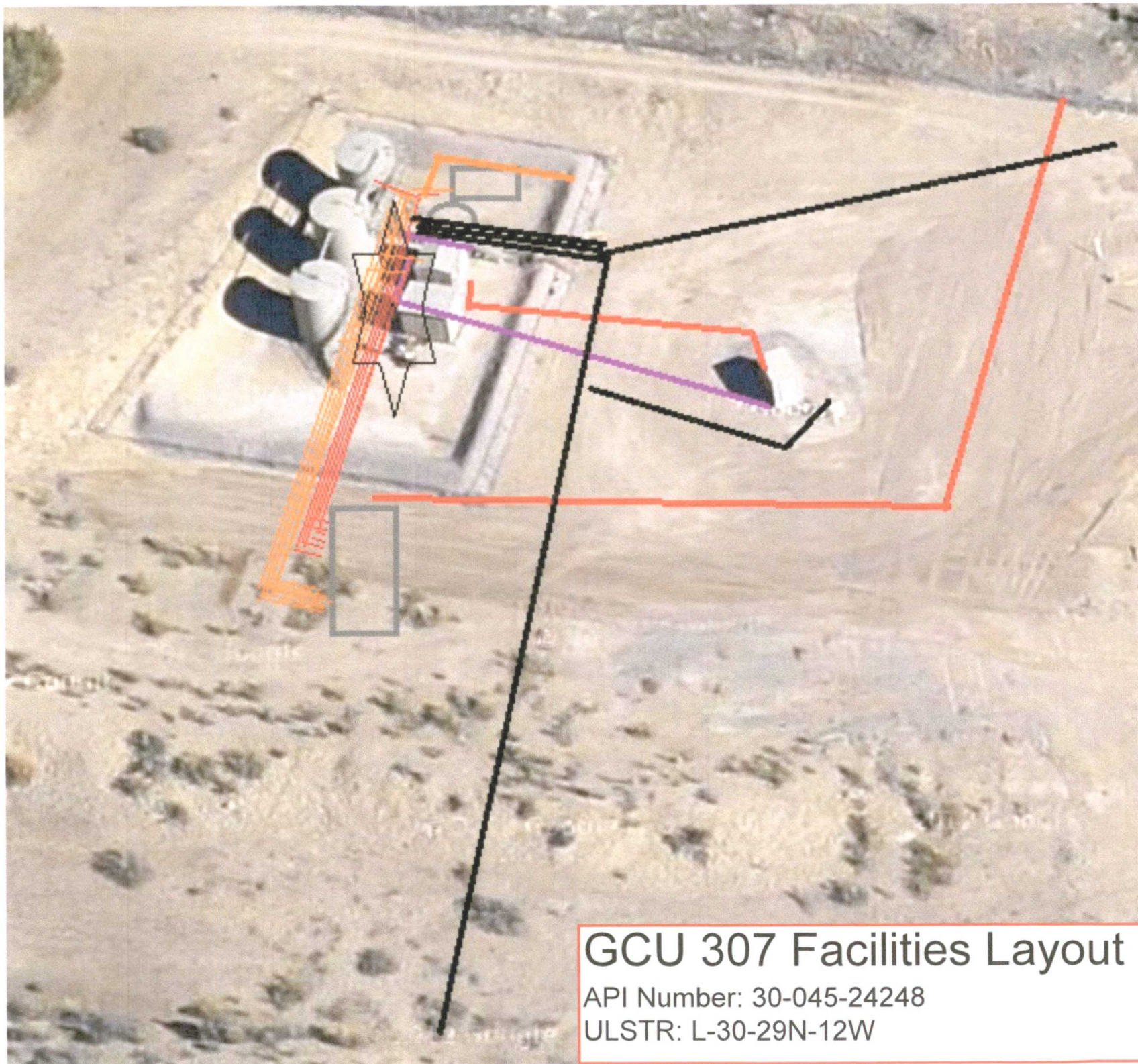
Soil will be collected from the borings at two foot intervals to be visually observed and field screened using a calibrated photoionization detector via headspace analysis in plastic storage bags.

Two soil samples will be collected from each boring; one from the highest field screening interval or visual impacts and one at the total depth of the boring. Samples will be collected and placed into

laboratory supplied 4-ounce glass jars, stored in an ice chest with ice and hand delivered to a nationally accredited environmental laboratory for analysis of total petroleum hydrocarbons (C6-C36), BTEX and chlorides via EPA approved methods 8015, 8021/8260 and 300.0 respectively.

Site Closure and Reporting

Once the final laboratory report is received, BP will discuss with the NMOCD and private landowner the investigative findings to determine if remediation is necessary and to what extent. A final report will delivered to NMOCD for review of investigative activities within 60 days.



GCU 307 Facilities Layout

API Number: 30-045-24248

ULSTR: L-30-29N-12W

GCU 307 BGT Auger Delineation

API Number: 30-045-24248
ULSTR: L-30-29N-12W

Legend

- GCU 307 BGT Location
- Hand Auger Location

GCU 307 BGT Location

Google Earth

© 2018 Google



60 ft

Analytical Report

Lab Order 1803D90

Date Reported:

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Project: GCU 307 SWD

Lab ID: 1803D90-001

Matrix: SOIL

Client Sample ID: 45 BGT 5-pt @ 5'

Collection Date: 3/26/2018 12:35:00 PM

Received Date: 3/27/2018 7:50:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: MRA
Chloride	290	30		mg/Kg	20	3/27/2018 11:53:00 AM	37258
EPA METHOD 8015D MOD: GASOLINE RANGE							Analyst: AG
Gasoline Range Organics (GRO)	ND	3.5		mg/Kg	1	3/27/2018 12:24:45 PM	R50102
Surr: BFB	114	70-130		%Rec	1	3/27/2018 12:24:45 PM	R50102
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	23	9.5		mg/Kg	1	3/27/2018 9:52:29 AM	37252
Motor Oil Range Organics (MRO)	220	48		mg/Kg	1	3/27/2018 9:52:29 AM	37252
Surr: DNOP	103	70-130		%Rec	1	3/27/2018 9:52:29 AM	37252
EPA METHOD 8260B: VOLATILES SHORT LIST							Analyst: AG
Benzene	ND	0.017		mg/Kg	1	3/27/2018 12:24:45 PM	R50102
Toluene	ND	0.035		mg/Kg	1	3/27/2018 12:24:45 PM	R50102
Ethylbenzene	ND	0.035		mg/Kg	1	3/27/2018 12:24:45 PM	R50102
Xylenes, Total	ND	0.069		mg/Kg	1	3/27/2018 12:24:45 PM	R50102
Surr: 4-Bromofluorobenzene	115	70-130		%Rec	1	3/27/2018 12:24:45 PM	R50102
Surr: Toluene-d8	87.4	70-130		%Rec	1	3/27/2018 12:24:45 PM	R50102

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	PQL	Practical Quantitative Limit	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified