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 Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NVF 1826739940
District RP	
Facility ID	
Application ID	

Release Notification

NMOCD

SEP 17 2018

DISTRICT III

Responsible Party

Responsible Party BP America Production Company	OGRID 778
Contact Name Steve Moskal	Contact Telephone 505-330-9179
Contact email steven.moskal@bpx.com	Incident # *(assigned by OCD)*
Contact mailing address 380 North Airport Road, Durango, CO 81303	

Location of Release Source

Latitude 36.65957 Longitude -108.09262

(NAD 83 in decimal degrees to 5 decimal places)

Site Name Gallegos Canyon Unit 208E (A)	Site Type Natural Gas Well Site
Date Release Discovered	API# *(if applicable)* 3004523898

Unit Letter	Section	Township	Range	County
I	15	28N	12W	San Juan

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (*Name:* _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release: No release confirmed, soil samples collected from a grab sample of discolored soil indicated remediation was required. Impacted soil was removed and disposed on at an OCD approved facility. Approximately 6 cubic yards removed. Attached is the field notes, lab results and completed certificate of waste.

18

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ■ No	If YES, for what reason(s) does the responsible party consider this a major release?

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Not required.

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

- ☐ The source of the release has been stopped.
- ☐ The impacted area has been secured to protect human health and the environment.
- ☐ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- ☐ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Not an active release. Likely historical in nature.

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Steve Moskal Title: Enviro Coord.

Signature:  Date: September 13,2018

email: steven.moskal@bpx.com Telephone: 505-330-9179

OCD Only

Received by: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	>100 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☑ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☑ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☑ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☑ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☑ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☑ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☑ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☑ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☑ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: ***Each of the following items must be included in the report.***

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: ***Each of the following items must be included in the plan.***

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: ***Each of the following items must be confirmed as part of any request for deferral of remediation.***

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: ***Each of the following items must be included in the closure report.***

A scaled site and sampling diagram as described in 19.15.29.11 NMAC

☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)

Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)

Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Steve Moskal Title: Enviro Coord

Signature: Steve Moskal Date: September 13, 2018

email: steven.moskal@bpx.com Telephone: 505-330-9179

OCD Only

Received by: Vanessa Fields Date: 9/24/2018

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Vanessa Fields Date: 9/24/2018

Printed Name: Vanessa Fields Title: Environmental Specialist


GCU 208E
GT (A) Impact Area
Cubic Yards Removed
Legend
Area of Impact BGT Tank A
Grab Sample
Grab Sample
Grab Sample
100 ft
Google Earth

CLIENT: BP

BLAGG ENGINEERING, INC.
P.O. BOX 87, BLOOMFIELD, NM 87413
(505) 632-1199

API #: 3004523898

TANK ID (if applicble): A

FIELD REPORT:

(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:

PAGE #: 1 of 1

SITE INFORMATION:

SITE NAME: GCU # 208E

QUAD/UNIT: I SEC: 15 TWP: 28N RNG: 12W PM: NM CNTY: SJ ST: NM

1/4 -1/4/FOOTAGE: 1,800'S / 835'E NE/SE LEASE TYPE: FEDERAL / STATE / FEE / INDIAN

LEASE #: SF078106 PROD. FORMATION: DK CONTRACTOR: STRIKE BP - J. GONZALES

DATE STARTED: 07/16/18

DATE FINISHED:

ENVIRONMENTAL SPECIALIST(S): NJV

REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: 36.65993 X 108.09291 GL ELEV.: 5,655'

1) 95 BGT (SW/DB) - A	GPS COORD.: 36.65957 X 108.09262	DISTANCE/BEARING FROM W.H.: 161.5', S39.5E
2)	GPS COORD.:	DISTANCE/BEARING FROM W.H.:
3)	GPS COORD.:	DISTANCE/BEARING FROM W.H.:
4)	GPS COORD.:	DISTANCE/BEARING FROM W.H.:

SAMPLING DATA:

CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL

	SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB ANALYSIS:	OVM READING (ppm)
1)	GRAB 1 @ 5' (95) - A	07/16/18	1335	8015B/8021B/300.0 (Cl)	395
2)	GRAB 2 @ 6.5' (95) - A	07/16/18	1337	8015B/8021B/300.0 (Cl)	113.1
3)					
4)					
5)					

SOIL DESCRIPTION:

SOIL TYPE: SAND / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER BEDROCK (SANDSTONE)

SOIL COLOR: PALE YELLOWISH ORANGE TO BROWN

COHESION (ALL OTHERS): NON COHESIVE / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE

CONSISTENCY (NON COHESIVE SOILS): LOOSE / FIRM / DENSE / VERY DENSE

MOISTURE: DRY / SLIGHTLY MOIST / MOIST / WET / SATURATED / SUPER SATURATED

SAMPLE TYPE: GRAB / COMPOSITE - # OF PTS. NA

DISCOLORATION/STAINING OBSERVED: YES / NO EXPLANATION - SMALL ISOLATED MEDIUM TO DARK GRAY CLUMPS (GRAB 1 SAMPLE).

PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC

DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD

HC ODOR DETECTED: YES / NO EXPLANATION - STAINED/DISCOLORED CLUMPS NOTED BELOW.

ANY AREAS DISPLAYING WETNESS: YES / NO EXPLANATION -

SITE OBSERVATIONS:

LOST INTEGRITY OF EQUIPMENT: YES / NO EXPLANATION - BOTTOM & SIDEWALL NEAR BASE OF TANK (A) ONLY.

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES / NO EXPLANATION: STAINING & PHYSICAL HYDROCARBON ODOR DETECTED AT TANK (A).

EQUIPMENT SET OVER RECLAIMED AREA: YES / NO EXPLANATION - 105 BBL SHALLOW LOW PROFILE ABOVE-GRADE TANK TO BE SET ATOP BGT LOCATION.

OTHER: NMOCD OR BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING. GRAB SAMPLES CONSISTED OF SANDSTONE - OLIVE GRAY, SOFT TO HARD, FRIABLE. BGT HAD GRAVEL BEDDING AT ITS BASE. DISCOLORED IMPACTED SOILS TRANSPORTED TO ENVIROTECH LANDFARM.

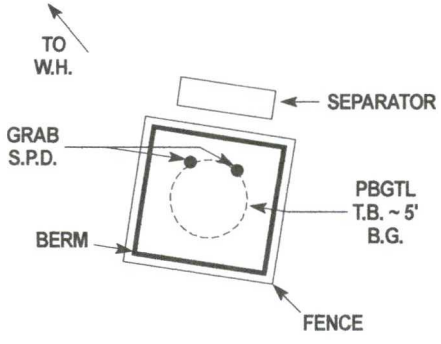
EXCAVATION DIMENSION ESTIMATION: 12 ft. X 4 ft. X 2 ft. EXCAVATION ESTIMATION (Cubic Yards): 5 ±

DEPTH TO GROUNDWATER: >100' NEAREST WATER SOURCE: >1,000' NEAREST SURFACE WATER: >300' / <1,000' NMOCD TPH CLOSURE STD: 2,500 ppm

SITE SKETCH

BGT Located: off / on site

PLOT PLAN circle: attached



● - S.P.D.

OVM CALIB. READ. = 99.6 ppm RF = 1.00

OVM CALIB. GAS = 100 ppm

TIME: 2:05 am/pm DATE: 07/16/18

MISCELL. NOTES

WO:

REF #: P-979

VID: VHIXONEVRM

PJ #:

Permit date(s): 06/03/10

OCD Appr. date(s): 03/07/17

Tank ID	OVM = Organic Vapor Meter ppm = parts per million
A	BGT Sidewalls Visible: Y / (N)
	BGT Sidewalls Visible: Y / N
	BGT Sidewalls Visible: Y / N

Magnetic declination: 10° E

NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.

NOTES: GOOGLE EARTH IMAGERY DATE: 3/15/2015 ONSITE: 07/16/18

Analytical Report
Lab Order **1807833**
Date Reported: **7/19/2018**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering
Project: GCU 208E
Lab ID: 1807833-001 **Matrix:** SOIL

Client Sample ID: GRAB 1 @ 5' (95)-A
Collection Date: 7/16/2018 1:35:00 PM
Received Date: 7/17/2018 8:25:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS						Analyst: **CJS**	
Chloride	250	30		mg/Kg	20	7/17/2018 12:23:21 PM	39246
EPA METHOD 8015D MOD: GASOLINE RANGE						Analyst: **AG**	
Gasoline Range Organics (GRO)	2800	180		mg/Kg	50	7/17/2018 10:43:02 AM	A52754
Surr: BFB	88.4	70-130		%Rec	50	7/17/2018 10:43:02 AM	A52754
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **lrm**	
Diesel Range Organics (DRO)	1300	99		mg/Kg	10	7/17/2018 1:36:34 PM	39239
Motor Oil Range Organics (MRO)	ND	500		mg/Kg	10	7/17/2018 1:36:34 PM	39239
Surr: DNOP	0	70-130	S	%Rec	10	7/17/2018 1:36:34 PM	39239
EPA METHOD 8260B: VOLATILES SHORT LIST						Analyst: **AG**	
Benzene	ND	0.92		mg/Kg	50	7/17/2018 10:43:02 AM	B52754
Toluene	12	1.8		mg/Kg	50	7/17/2018 10:43:02 AM	B52754
Ethylbenzene	7.1	1.8		mg/Kg	50	7/17/2018 10:43:02 AM	B52754
Xylenes, Total	83	3.7		mg/Kg	50	7/17/2018 10:43:02 AM	B52754
Surr: 4-Bromofluorobenzene	99.2	70-130		%Rec	50	7/17/2018 10:43:02 AM	B52754
Surr: Toluene-d8	99.3	70-130		%Rec	50	7/17/2018 10:43:02 AM	B52754

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 Quanitative 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

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering
Project: GCU 208E
Lab ID: 1807833-002 **Matrix:** SOIL

Client Sample ID: GRAB 2 @ 6.5' (95)-A
Collection Date: 7/16/2018 1:37:00 PM
Received Date: 7/17/2018 8:25:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS						Analyst: **CJS**	
Chloride	350	30		mg/Kg	20	7/17/2018 12:35:45 PM	39246
EPA METHOD 8015D MOD: GASOLINE RANGE						Analyst: **AG**	
Gasoline Range Organics (GRO)	38	18		mg/Kg	5	7/17/2018 1:02:33 PM	A52754
Surr: BFB	111	70-130		%Rec	5	7/17/2018 1:02:33 PM	A52754
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **lrm**	
Diesel Range Organics (DRO)	40	10		mg/Kg	1	7/17/2018 10:58:26 AM	39239
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	7/17/2018 10:58:26 AM	39239
Surr: DNOP	101	70-130		%Rec	1	7/17/2018 10:58:26 AM	39239
EPA METHOD 8260B: VOLATILES SHORT LIST						Analyst: **AG**	
Benzene	ND	0.091		mg/Kg	5	7/17/2018 11:06:18 AM	B52754
Toluene	ND	0.18		mg/Kg	5	7/17/2018 11:06:18 AM	B52754
Ethylbenzene	ND	0.18		mg/Kg	5	7/17/2018 11:06:18 AM	B52754
Xylenes, Total	ND	0.36		mg/Kg	5	7/17/2018 11:06:18 AM	B52754
Surr: 4-Bromofluorobenzene	132	70-130	S	%Rec	5	7/17/2018 11:06:18 AM	B52754
Surr: Toluene-d8	94.9	70-130		%Rec	5	7/17/2018 11:06:18 AM	B52754

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 Quanitative 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

Chain-of-Custody Record

Client: BLAGG ENGR. / BP AMERICA

Mailing Address: P.O. BOX 87
BLOOMFIELD, NM 87413

Phone #: (505) 632-1199

email or Fax#:

QA/QC Package:
☑ Standard ☐ Level 4 (Full Validation)

Accreditation:
☐ NELAP ☐ Other
☐ EDD (Type)

Turn-Around Time:
☐ Standard ☑ Rush SAME DAY

Project Name: GCU # 208E

Project #:

Project Manager: ERIN GARIFALOS

Sampler: NELSON VELEZ

On Ice: ☒ Yes ☐ No NY

Sample Temperature: 21

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type (At 07/17/18 MeOH Kit)	HEAL No. 1807833	BTEX + ~~MTBE + TMB's~~ (8021B)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (GRO / DRO / MRO)	TPH (Method 418.1)	EDB (Method 504.1)	PAH (8310 or 8270SIMS)	RCRA 8 Metals	Anions ($F, Cl, NO_3, NO_2, PO_4, SO_4$)	8081 Pesticides / 8082 PCB's	8260B (VOA)	8270 (Semi-VOA)	Chloride (soil - 300.0 / water - 300.1)		Grab sample	# pt. composite sample	Air Bubbles (Y or N)
7/16/18	1335	SOIL	GRAB 1 @ 5' (95)-A	4oz.-1	Cool	001	✓		✓									✓		✓		
7/16/18	1337	SOIL	GRAB 2 @ 6.5' (95)-A	4oz.-1	Cool	002	✓		✓									✓		✓		

Date	Time	Relinquished by:	Received by:	Date	Time
7/16/18	1600			7/16/18	1600
7/16/18	1810			07/17/18	0825

Remarks: BILL DIRECTLY TO BP USING THE CONTACT WITH CORRESPONDING VID & REFERENCE # WHEN APPLICABLE;
CONTACT: ERIN GARIFALOS / VANCE HIXON
VID: VHIXONEVRM
Reference # P - 979

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1807833**

19-Jul-18

Client: Blagg Engineering
Project: GCU 208E

Sample ID	**MB-39246**	SampType:	**mblk**		TestCode:	**EPA Method 300.0: Anions**				
Client ID:	**PBS**	Batch ID:	**39246**		RunNo:	**52750**				
Prep Date:	**7/17/2018**	Analysis Date:	**7/17/2018**		SeqNo:	**1733779**	Units:	**mg/Kg**		

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	**LCS-39246**	SampType:	**lcs**		TestCode:	**EPA Method 300.0: Anions**				
Client ID:	**LCSS**	Batch ID:	**39246**		RunNo:	**52750**				
Prep Date:	**7/17/2018**	Analysis Date:	**7/17/2018**		SeqNo:	**1733780**	Units:	**mg/Kg**		

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.5	90	110			

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 Quanitative 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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1807833**

19-Jul-18

Client: Blagg Engineering
Project: GCU 208E

Sample ID **MB-39239**	SampType: **MBLK**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **PBS**	Batch ID: **39239**	RunNo: **52741**
Prep Date: **7/17/2018**	Analysis Date: **7/17/2018**	SeqNo: **1732300** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	9.0		10.00		90.3	70	130			

Sample ID **LCS-39239**	SampType: **LCS**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **LCSS**	Batch ID: **39239**	RunNo: **52741**
Prep Date: **7/17/2018**	Analysis Date: **7/17/2018**	SeqNo: **1732301** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	47	10	50.00	0	93.1	70	130			
Surr: DNOP	4.2		5.000		83.0	70	130			

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 Quanitative 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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1807833**

19-Jul-18

Client: Blagg Engineering
Project: GCU 208E

Sample ID **100ng btex lcs**	SampType: **LCS4**	TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **BatchQC**	Batch ID: **B52754**	RunNo: **52754**
Prep Date:	Analysis Date: **7/17/2018**	SeqNo: **1732511** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.0	0.025	1.000	0	102	80	120			
Toluene	1.1	0.050	1.000	0	107	80	120			
Ethylbenzene	1.1	0.050	1.000	0	106	80	120			
Xylenes, Total	3.1	0.10	3.000	0	104	80	120			
Surr: 4-Bromofluorobenzene	0.49		0.5000		98.4	70	130			
Surr: Toluene-d8	0.48		0.5000		95.5	70	130			

Sample ID **rb**	SampType: **MBLK**	TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **PBS**	Batch ID: **B52754**	RunNo: **52754**
Prep Date:	Analysis Date: **7/17/2018**	SeqNo: **1732519** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.55		0.5000		111	70	130			
Surr: Toluene-d8	0.48		0.5000		95.4	70	130			

Sample ID **1807833-002ams**	SampType: **MS4**	TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **GRAB 2 @ 6.5' (95)-**	Batch ID: **B52754**	RunNo: **52754**
Prep Date:	Analysis Date: **7/17/2018**	SeqNo: **1733480** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	3.6	0.091	3.626	0	100	80	120			
Toluene	3.7	0.18	3.626	0.01831	102	80	120			
Ethylbenzene	3.8	0.18	3.626	0	104	82	121			
Xylenes, Total	12	0.36	10.88	0	109	80.2	120			
Surr: 4-Bromofluorobenzene	2.0		1.813		113	70	130			
Surr: Toluene-d8	1.7		1.813		92.6	70	130			

Sample ID **1807833-002AMSD**	SampType: **MSD4**	TestCode: **EPA Method 8260B: Volatiles Short List**
Client ID: **GRAB 2 @ 6.5' (95)-**	Batch ID: **B52754**	RunNo: **52754**
Prep Date:	Analysis Date: **7/17/2018**	SeqNo: **1733481** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	3.6	0.091	3.626	0	98.5	80	120			
Toluene	3.6	0.18	3.626	0.01831	100	80	120			
Ethylbenzene	3.6	0.18	3.626	0	100	82	121			
Xylenes, Total	11	0.36	10.88	0	102	80.2	120			

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 Quanitative 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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1807833**

19-Jul-18

Client: Blagg Engineering

Project: GCU 208E

Sample ID	**1807833-002AMSD**	SampType:	**MSD4**	TestCode:	**EPA Method 8260B: Volatiles Short List**
Client ID:	**GRAB 2 @ 6.5' (95)-**	Batch ID:	**B52754**	RunNo:	**52754**
Prep Date:		Analysis Date:	**7/17/2018**	SeqNo:	**1733481**
Units:	**mg/Kg**				

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	2.0		1.813		109	70	130			
Surr: Toluene-d8	1.7		1.813		93.5	70	130			

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 Quanitative 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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1807833**

19-Jul-18

Client: Blagg Engineering
Project: GCU 208E

Sample ID **2.5ug gro lcs**	SampType: **LCS**	TestCode: **EPA Method 8015D Mod: Gasoline Range**
Client ID: **LCSS**	Batch ID: **A52754**	RunNo: **52754**
Prep Date:	Analysis Date: **7/17/2018**	SeqNo: **1732508** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	26	5.0	25.00	0	102	70	130			
Surr: BFB	460		500.0		91.3	70	130			

Sample ID **rb**	SampType: **MBLK**	TestCode: **EPA Method 8015D Mod: Gasoline Range**
Client ID: **PBS**	Batch ID: **A52754**	RunNo: **52754**
Prep Date:	Analysis Date: **7/17/2018**	SeqNo: **1732509** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	490		500.0		98.7	70	130			

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 Quanitative 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

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: BLAGG | Work Order Number: 1807833 | RcptNo: 1

Received By: Anne Thorne 7/17/2018 8:25:00 AM

Completed By: Anne Thorne 7/17/2018 8:28:44 AM

Reviewed By: ENM 7/17/18

Labeled by: AT 07/17/18

Chain of Custody

1. Is Chain of Custody complete? Yes ☑ No ☐ Not Present ☐
2. How was the sample delivered? Courier

Log In

3. Was an attempt made to cool the samples? Yes ☑ No ☐ NA ☐
4. Were all samples received at a temperature of >0° C to 6.0°C Yes ☑ No ☐ NA ☐
5. Sample(s) in proper container(s)? Yes ☑ No ☐
6. Sufficient sample volume for indicated test(s)? Yes ☑ No ☐
7. Are samples (except VOA and ONG) properly preserved? Yes ☑ No ☐
8. Was preservative added to bottles? Yes ☐ No ☑ NA ☐
9. VOA vials have zero headspace? Yes ☐ No ☐ No VOA Vials ☑
10. Were any sample containers received broken? Yes ☐ No ☑
11. Does paperwork match bottle labels? (Note discrepancies on chain of custody) Yes ☑ No ☐
12. Are matrices correctly identified on Chain of Custody? Yes ☑ No ☐
13. Is it clear what analyses were requested? Yes ☑ No ☐
14. Were all holding times able to be met? (If no, notify customer for authorization.) Yes ☑ No ☐

# of preserved bottles checked for pH: _____ (<2 or >12 unless noted)

Adjusted? _____

Checked by: _____

Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: _____ Date _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

16. Additional remarks:

17. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.1	Good	Yes			

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 03143-1275

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-138
Revised August 1, 2011

*Surface Waste Management Facility Operator and Generator shall maintain and make this documentation available for Division inspection.

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. **Generator Name and Address:**
BP America Production Co. 200 Energy Ct. Farmington, NM 87401

2. **Originating Site:**
Gallegos Canyon Unit 208E
VID: VHIXONEVRM

3. **Location of Material (Street Address, City, State or ULSTR):**
QRT/QRT: NE/SE Unit: I Section: 15 T28N R12W July 2018

4. **Source and Description of Waste:** Hydrocarbon impacted associated with a remedial excavation of a hydrocarbon release.

Estimated Volume 5 ☒ yd³ / ☐ bbls Known Volume (to be entered by the operator at the end of the haul) 6 (yd³) / ☐ bbls

5. **GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS**

I, Steve Moskal, representative or authorized agent for BP America Production Company do hereby certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 1988 regulatory determination, the above described waste is: (Check the appropriate classification)

☒ RCRA Exempt: Oil field wastes generated from oil and gas exploration and production operations and are not mixed with non-exempt waste. *Operator Use Only: Waste Acceptance Frequency* ☐ *Monthly* ☐ *Weekly* ☐ *Per Load*

☐ RCRA Non-Exempt: Oil field waste which is non-hazardous that does not exceed the minimum standards for waste hazardous by characteristics established in RCRA regulations, 40 CFR 261.21-261.24, or listed hazardous waste as defined in 40 CFR, part 261, subpart D, as amended. The following documentation is attached to demonstrate the above-described waste is non-hazardous. (Check the appropriate items)

☐ MSDS Information ☐ RCRA Hazardous Waste Analysis ☒ Process Knowledge ☐ Other (Provide description in Box 4)

GENERATOR 19.15.36.15 WASTE TESTING CERTIFICATION STATEMENT FOR LANDFARMS

Steve Moskal, representative fc BP America Production Company authorize Envirotech to complete the required testing/sign the Generator Waste Testing Certification.

I, _____, representative for Envirotech do hereby certify that representative samples of the oil field waste have been subjected to the paint filter test and tested for chloride content and that the samples have been found to conform to the specific requirements applicable to landfarms pursuant to Section 15 of 19.15.36 NMAC. The results of the representative samples are attached to demonstrate the above-described waste conform to the requirements of Section 15 of 19.15.36 NMAC.

5. **Transporter:**
Crossfire/Strike

OCD Permitted Surface Waste Management Facility

Name and Facility Permit #: Envirotech Landfarm #2; Permit # NM-01-0011

Address of Facility: #43 CR 7175, 14 Miles S of Bloomfield, NM

Method of Treatment and/or Disposal:

☐ Evaporation ☐ Injection ☐ Treating Plant ☒ Landfarm ☐ Landfill ☐ Other

Waste Acceptance Status:

☒ **APPROVED** ☐ **DENIED** (Must Be Maintained As Permanent Record)

PRINT NAME: Greg Crabtree TITLE: Environmental Manager DATE: 7/18/18

SIGNATURE: _____ TELEPHONE NO.: 505-632-0615

Surface Waste Management Facility Authorized Agent