

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**

Initial Report  Final Report

Name of Company: BP	Contact: Steve Moskal
Address: 380 Airport Road, Suite A, Durango, CO 81303	Telephone No.: 505-330-9179
Facility Name: Gallegos Canyon Unit 235	Facility Type: Natural gas well

Surface Owner: Fee	Mineral Owner: Federal	API No. 3004511691
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**LOCATION OF RELEASE**

Unit Letter H	Section 13	Township 28N	Range 13W	Feet from the 2240	North/South Line North	Feet from the 995	East/West Line East	County: San Juan
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Latitude 36.66317° Longitude -108.16467°

**NATURE OF RELEASE**

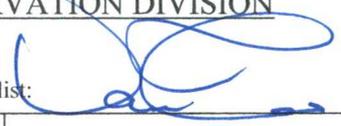
Type of Release: hydrocarbons	Volume of Release: unknown	Volume Recovered: none
Source of Release: Integrity of BGT fitting on inspection port	Date and Hour of Occurrence: unknown	Date and Hour of Discovery: February 23, 2018; 1:00 PM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> 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 95 bbl tank. Lab analysis confirms the impacts are above the BGT closure standards and spill and release guidelines with a site ranking of 0.

Describe Area Affected and Cleanup Action Taken.\* The area has been fully delineated with impacts removed and hauled off site on June 11, 2018 after a subsequent excavation to remove soils which were left in place by the crew. The attached report documents the field activities, confirmation sampling of the soil being removed from the site and a certificate of waste for the removed soils. BP request no further action in regards to this event.

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: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Steve Moskal	Approved by Environmental Specialist: 	
Title: Field Environmental Coordinator	Approval Date: <u>10/24/18</u>	Expiration Date:
E-mail Address: steven.moskal@bp.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: June 21, 2018	Phone: 505-330-9179	

\* Attach Additional Sheets If Necessary

NVF 1812137578

NMOCD

JUN 26 2018

DISTRICT III

16

CLIENT: **BP**

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

API #: **3004511691**

TANK ID (if applicable): **A**

# FIELD REPORT:

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

PAGE #: **1** of **1**

## SITE INFORMATION:

SITE NAME: **GCU # 235**

DATE STARTED: **06/11/18**

QUAD/UNIT: **H** SEC: **13** TWP: **28N** RNG: **13W** PM: **NM** CNTY: **SJ** ST: **NM**

DATE FINISHED:

1/4 - 1/4 FOOTAGE: **2,240'N / 995'E** **SE/NE** LEASE TYPE: **FEDERAL** / STATE / FEE / INDIAN

ENVIRONMENTAL SPECIALIST(S): **NJV**

LEASE #: **SF078807A** PROD. FORMATION: **DK** CONTRACTOR: **BP - J. GONZALES**

## REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: **36.66333 X 108.16502** GL ELEV.: **5,632'**

1) <b>95 BGT (SW/DB) - A</b>	GPS COORD.: <b>36.66317 X 108.16467</b>	DISTANCE/BEARING FROM W.H.: <b>114', S74.5E</b>
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**

OVM READING (ppm)

1) SAMPLE ID: <b>GRAB @ 4' (95) - A</b>	SAMPLE DATE: <b>02/23/18</b>	SAMPLE TIME: <b>1250</b>	LAB ANALYSIS: <b>8015B/8021B/300.0 (CI)</b>	<b>1,917</b>
2) SAMPLE ID: <b>GRAB @ 8' (95) - A</b>	SAMPLE DATE: <b>02/23/18</b>	SAMPLE TIME: <b>1300</b>	LAB ANALYSIS: <b>8015B/8021B/300.0 (CI)</b>	<b>4.7</b>
3) SAMPLE ID: <b>5PC - TH @ 4',6',8'</b>	SAMPLE DATE: <b>06/11/18</b>	SAMPLE TIME: <b>1300</b>	LAB ANALYSIS: <b>8015B/8021B/300.0 (CI)</b>	<b>NA</b>
4) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB ANALYSIS:	
5) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB ANALYSIS:	

## SOIL DESCRIPTION:

SOIL TYPE: **SAND** / SILTY SAND / SILT / SILTY CLAY / CLAY / **GRAVEL** / OTHER: **(imported)**

SOIL COLOR: **MOSTLY DARK YELLOWISH ORANGE**  
 PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC  
 COHESION (ALL OTHERS): **NON COHESIVE** / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE  
 DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD  
 CONSISTENCY (NON COHESIVE SOILS): **LOOSE** / FIRM / DENSE / VERY DENSE  
 HC ODOR DETECTED: **YES** / NO EXPLANATION - **DISCOLORED SOILS ONLY.**  
 MOISTURE: DRY / **SLIGHTLY MOIST** / MOIST / WET / SATURATED / SUPER SATURATED  
 SAMPLE TYPE: **GRAB** COMPOSITE - # OF PTS. **NA**  
 ANY AREAS DISPLAYING WETNESS: YES  NO  EXPLANATION -  
 DISCOLORATION/STAINING OBSERVED: **YES** / NO EXPLANATION - **GRAY TO BLACK AT NE QUADRANT OF 95 BGT ONLY.**

## SITE OBSERVATIONS:

LOST INTEGRITY OF EQUIPMENT: **YES** / NO EXPLANATION - **90 DEG. FITTING AT BOTTOM OF BGT INSPECTION PORT.**

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: **YES** / NO EXPLANATION: **HYDROCARBONS PHYSICALLY OBSERVED & DETECTED.**  
 EQUIPMENT SET OVER RECLAIMED AREA: **YES** / NO EXPLANATION - **105 BBL SHALLOW LOW PROFILE ABOVE-GRADE TANK TO BE SET ATOP BGT LOCATION.**  
 OTHER: **NMOC D OR BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING. IMPORTED GRAVEL AT BASE OF BGT APPROX. 1 FT. THICK.**  
**IMPACTED SOILS APPEAR RELATIVELY SMALL IN QUANTITY (estimated < 2 cubic yards).**

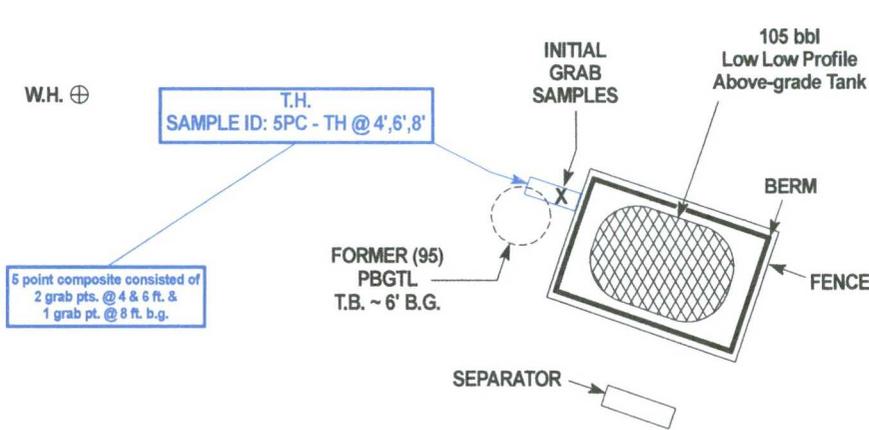
EXCAVATION DIMENSION ESTIMATION: **8** ft. X **4** ft. X **8** ft. EXCAVATION ESTIMATION (Cubic Yards): **10 1/2**

DEPTH TO GROUNDWATER: **<100'** NEAREST WATER SOURCE: **>1,000'** NEAREST SURFACE WATER: **<200'** NMOC D TPH CLOSURE STD: **100** ppm

## SITE SKETCH

BGT Located: off /  on site PLOT PLAN circle: **attached**

OVM CALIB. READ. = **NA** ppm RF=1.00  
 OVM CALIB. GAS = **NA** ppm  
 TIME: **NA** am/pm DATE: **NA**



**X - S.P.D.**

## MISCELL. NOTES

WO:  
 REF #:  
 VID: **VHIXONEVRM**  
 SIO #: **190040007685**  
 Permit date(s): **06/14/10**  
 OCD Appr. date(s): **03/07/17**  
 Tank ID: **A** OVM = Organic Vapor Meter ppm = parts per million  
 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: **02/23/18, 06/11/18**

# Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1802D30

Date Reported: 2/27/2018

CLIENT: Blagg Engineering

Client Sample ID: Grab @ 4' (95)-A

Project: GCU 235

Collection Date: 2/23/2018 12:50:00 PM

Lab ID: 1802D30-001

Matrix: SOIL

Received Date: 2/24/2018 9:25:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: MRA
Chloride	ND	30		mg/Kg	20	2/26/2018 11:21:28 AM	36723
<b>EPA METHOD 8015D MOD: GASOLINE RANGE</b>							Analyst: AG
Gasoline Range Organics (GRO)	3400	75		mg/Kg	20	2/26/2018 10:15:41 AM	G49376
Surr: BFB	102	70-130		%Rec	20	2/26/2018 10:15:41 AM	G49376
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: TOM
Diesel Range Organics (DRO)	6500	94		mg/Kg	10	2/26/2018 10:37:40 AM	36706
Motor Oil Range Organics (MRO)	1000	470		mg/Kg	10	2/26/2018 10:37:40 AM	36706
Surr: DNOP	0	70-130	S	%Rec	10	2/26/2018 10:37:40 AM	36706
<b>EPA METHOD 8260B: VOLATILES SHORT LIST</b>							Analyst: AG
Benzene	ND	0.37		mg/Kg	20	2/26/2018 10:15:41 AM	R49376
Toluene	ND	0.75		mg/Kg	20	2/26/2018 10:15:41 AM	R49376
Ethylbenzene	2.4	0.75		mg/Kg	20	2/26/2018 10:15:41 AM	R49376
Xylenes, Total	37	1.5		mg/Kg	20	2/26/2018 10:15:41 AM	R49376
Surr: 4-Bromofluorobenzene	93.2	70-130		%Rec	20	2/26/2018 10:15:41 AM	R49376
Surr: Toluene-d8	101	70-130		%Rec	20	2/26/2018 10:15:41 AM	R49376

**Total Petroleum Hydrocarbons (TPH)**

GRO = 3,400 mg/Kg

DRO = 1,000 mg/Kg

MRO = 6,500 mg/Kg

**Total TPH = 10,900 mg/Kg**

**TPH Closure Standard = 100 mg/Kg**

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

<b>Qualifiers:</b>	* 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	Page 1 of 7
	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	

**Hall Environmental Analysis Laboratory, Inc.**

CLIENT: Blagg Engineering

Client Sample ID: Grab @ 8' (95)-A

Project: GCU 235

Collection Date: 2/23/2018 1:00:00 PM

Lab ID: 1802D30-002

Matrix: SOIL

Received Date: 2/24/2018 9:25:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: MRA
Chloride	ND	30		mg/Kg	20	2/26/2018 11:33:52 AM	36723
<b>EPA METHOD 8015D MOD: GASOLINE RANGE</b>							Analyst: AG
Gasoline Range Organics (GRO)	ND	4.5		mg/Kg	1	2/26/2018 10:38:38 AM	G49376
Surr: BFB	119	70-130		%Rec	1	2/26/2018 10:38:38 AM	G49376
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: TOM
Diesel Range Organics (DRO)	35	9.8		mg/Kg	1	2/26/2018 11:31:53 AM	36706
Motor Oil Range Organics (MRO)	ND	49		mg/Kg	1	2/26/2018 11:31:53 AM	36706
Surr: DNOP	91.6	70-130		%Rec	1	2/26/2018 11:31:53 AM	36706
<b>EPA METHOD 8260B: VOLATILES SHORT LIST</b>							Analyst: AG
Benzene	ND	0.023		mg/Kg	1	2/26/2018 10:38:38 AM	R49376
Toluene	ND	0.045		mg/Kg	1	2/26/2018 10:38:38 AM	R49376
Ethylbenzene	ND	0.045		mg/Kg	1	2/26/2018 10:38:38 AM	R49376
Xylenes, Total	ND	0.090		mg/Kg	1	2/26/2018 10:38:38 AM	R49376
Surr: 4-Bromofluorobenzene	111	70-130		%Rec	1	2/26/2018 10:38:38 AM	R49376
Surr: Toluene-d8	91.2	70-130		%Rec	1	2/26/2018 10:38:38 AM	R49376

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

<b>Qualifiers:</b>	*	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

# Hall Environmental Analysis Laboratory, Inc.

Analytical Report

Lab Order 1806616

Date Reported:

CLIENT: Blagg Engineering

Client Sample ID: 5PC-TH @ 4',6',8'

Project: GCU 235

Collection Date: 6/11/2018 10:20:00 AM

Lab ID: 1806616-001

Matrix: SOIL

Received Date: 6/12/2018 6:50:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: MRA
Chloride	270	30		mg/Kg	20	6/12/2018 10:13:00 AM	38621
<b>EPA METHOD 8015D MOD: GASOLINE RANGE</b>							Analyst: AG
Gasoline Range Organics (GRO)	5.6	4.1		mg/Kg	1	6/12/2018 9:51:40 AM	R51906
Surr: BFB	126	70-130		%Rec	1	6/12/2018 9:51:40 AM	R51906
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: Irm
Diesel Range Organics (DRO)	130	10		mg/Kg	1	6/12/2018 11:14:25 AM	38618
Motor Oil Range Organics (MRO)	91	50		mg/Kg	1	6/12/2018 11:14:25 AM	38618
Surr: DNOP	119	70-130		%Rec	1	6/12/2018 11:14:25 AM	38618
<b>EPA METHOD 8260B: VOLATILES SHORT LIST</b>							Analyst: AG
Benzene	ND	0.021		mg/Kg	1	6/12/2018 9:51:40 AM	R51906
Toluene	ND	0.041		mg/Kg	1	6/12/2018 9:51:40 AM	R51906
Ethylbenzene	ND	0.041		mg/Kg	1	6/12/2018 9:51:40 AM	R51906
Xylenes, Total	ND	0.083		mg/Kg	1	6/12/2018 9:51:40 AM	R51906
Surr: 4-Bromofluorobenzene	132	70-130	S	%Rec	1	6/12/2018 9:51:40 AM	R51906
Surr: Toluene-d8	100	70-130		%Rec	1	6/12/2018 9:51:40 AM	R51906

**Total Petroleum Hydrocarbons (TPH)**

GRO = 5.6 mg/Kg  
DRO = 130 mg/Kg  
MRO = 91 mg/Kg

**Total TPH = 226.6 mg/Kg**

**TPH Closure Standard = 100 mg/Kg**

**Composite sample represents soil removed from the location**

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

<b>Qualifiers:</b>	*	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 at t

PRELIMINARY

# 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: **SAME DAY**

Standard  Rush

Project Name: **GCU # 235**

Project #:



## HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

Project Manager: **ERIN GARIFALOS**

Sampler: **NELSON VELEZ**

On Ice:  Yes  No *NT*

Sample Temperature: *0.1*

### Analysis Request

Date	Time	Matrix	Sample Request ID	Container Type and # <i>McOHLT</i>	Preservative Type	HEAL No. <i>R02D30</i>	BTEX + MTBE + TPH (Gas only)	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 <sub>3</sub> , NO <sub>2</sub> , PO <sub>4</sub> , SO <sub>4</sub> )	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)
<i>2/23/18</i>	<i>1250</i>	<i>SOIL</i>	<i>GRAB @ 4' (95)-A</i>	<i>402-1</i>	<i>COOL</i>	<i>201</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>										<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
<i>2/23/18</i>	<i>1300</i>	<i>SOIL</i>	<i>GRAB @ 8' (95)-B</i>	<i>402-1</i>	<i>COOL</i>	<i>202</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>										<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

Date: *2/23/18* Time: *1525* Relinquished by: *[Signature]*

Date: *2/23/18* Time: *1810* Relinquished by: *[Signature]*

Received by: *[Signature]* Date: *2/23/18* Time: *1525*

Received by: *[Signature]* Date: *2/24/18* Time: *925*

Remarks: **BILL DIRECTLY TO BP USING THE CONTACT WITH CORRESPONDING VID & REFERENCE # WHEN APPLICABLE;**

CONTACT: **ERIN GARIFALOS / VANCE HIXON**

VID: **VHIXONEVRM**

Reference # **P - 932**

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 noted on the analytical report.

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1802D30

27-Feb-18

**Client:** Blagg Engineering  
**Project:** GCU 235

Sample ID	<b>MB-36723</b>	SampType:	mbk	TestCode:	<b>EPA Method 300.0: Anions</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>36723</b>	RunNo:	<b>49384</b>					
Prep Date:	<b>2/26/2018</b>	Analysis Date:	<b>2/26/2018</b>	SeqNo:	<b>1595313</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	<b>LCS-36723</b>	SampType:	Ics	TestCode:	<b>EPA Method 300.0: Anions</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>36723</b>	RunNo:	<b>49384</b>					
Prep Date:	<b>2/26/2018</b>	Analysis Date:	<b>2/26/2018</b>	SeqNo:	<b>1595314</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	91.6	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 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 |

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1802D30

27-Feb-18

Client: Blagg Engineering

Project: GCU 235

Sample ID	<b>LCS-36706</b>	SampType:	<b>LCS</b>	TestCode:	<b>EPA Method 8015M/D: Diesel Range Organics</b>					
Client ID:	<b>LCSS</b>	Batch ID:	<b>36706</b>	RunNo:	<b>49373</b>					
Prep Date:	<b>2/26/2018</b>	Analysis Date:	<b>2/26/2018</b>	SeqNo:	<b>1594363</b>	Units:	<b>mg/Kg</b>			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	46	10	50.00	0	91.4	70	130			
Surr: DNOP	4.6		5.000		92.4	70	130			

Sample ID	<b>MB-36706</b>	SampType:	<b>MBLK</b>	TestCode:	<b>EPA Method 8015M/D: Diesel Range Organics</b>					
Client ID:	<b>PBS</b>	Batch ID:	<b>36706</b>	RunNo:	<b>49373</b>					
Prep Date:	<b>2/26/2018</b>	Analysis Date:	<b>2/26/2018</b>	SeqNo:	<b>1594364</b>	Units:	<b>mg/Kg</b>			
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	10		10.00		100	70	130			

### Qualifiers:

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

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1802D30

27-Feb-18

**Client:** Blagg Engineering  
**Project:** GCU 235

Sample ID <b>100ng lcs</b>	SampType: <b>LCS4</b>		TestCode: <b>EPA Method 8260B: Volatiles Short List</b>							
Client ID: <b>BatchQC</b>	Batch ID: <b>R49376</b>		RunNo: <b>49376</b>							
Prep Date:	Analysis Date: <b>2/26/2018</b>		SeqNo: <b>1594398</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.95	0.025	1.000	0	94.8	80	120			
Toluene	0.94	0.050	1.000	0	94.4	80	120			
Ethylbenzene	0.92	0.050	1.000	0	92.2	80	120			
Xylenes, Total	2.9	0.10	3.000	0	95.9	80	120			
Surr: 4-Bromofluorobenzene	0.45		0.5000		90.2	70	130			
Surr: Toluene-d8	0.49		0.5000		97.1	70	130			

Sample ID <b>rb</b>	SampType: <b>MBLK</b>		TestCode: <b>EPA Method 8260B: Volatiles Short List</b>							
Client ID: <b>PBS</b>	Batch ID: <b>R49376</b>		RunNo: <b>49376</b>							
Prep Date:	Analysis Date: <b>2/26/2018</b>		SeqNo: <b>1594406</b>		Units: <b>mg/Kg</b>					
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	0.51		0.5000		102	70	130			
Surr: Toluene-d8	0.48		0.5000		95.2	70	130			

Sample ID <b>1802d30-002ams</b>	SampType: <b>MS4</b>		TestCode: <b>EPA Method 8260B: Volatiles Short List</b>							
Client ID: <b>Grab @ 8' (95)-A</b>	Batch ID: <b>R49376</b>		RunNo: <b>49376</b>							
Prep Date:	Analysis Date: <b>2/26/2018</b>		SeqNo: <b>1594809</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.79	0.023	0.9017	0	88.2	80	120			
Toluene	0.80	0.045	0.9017	0	89.1	80	120			
Ethylbenzene	0.78	0.045	0.9017	0	86.5	80	120			
Xylenes, Total	2.5	0.090	2.705	0.02445	91.1	80	120			
Surr: 4-Bromofluorobenzene	0.42		0.4508		92.1	70	130			
Surr: Toluene-d8	0.41		0.4508		90.9	70	130			

Sample ID <b>1802d30-002amsd</b>	SampType: <b>MSD4</b>		TestCode: <b>EPA Method 8260B: Volatiles Short List</b>							
Client ID: <b>Grab @ 8' (95)-A</b>	Batch ID: <b>R49376</b>		RunNo: <b>49376</b>							
Prep Date:	Analysis Date: <b>2/26/2018</b>		SeqNo: <b>1594810</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.79	0.023	0.9017	0	88.1	80	120	0.121	0	
Toluene	0.82	0.045	0.9017	0	90.4	80	120	1.49	0	
Ethylbenzene	0.82	0.045	0.9017	0	91.3	80	120	5.44	0	
Xylenes, Total	2.4	0.090	2.705	0.02445	88.1	80	120	3.35	0	

**Qualifiers:**

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

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 1802D30

27-Feb-18

**Client:** Blagg Engineering

**Project:** GCU 235

Sample ID	1802d30-002amsd	SampType:	MSD4	TestCode:	EPA Method 8260B: Volatiles Short List					
Client ID:	Grab @ 8' (95)-A	Batch ID:	R49376	RunNo:	49376					
Prep Date:		Analysis Date:	2/26/2018	SeqNo:	1594810	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	0.43		0.4508		95.1	70	130	0	0	
Surr: Toluene-d8	0.42		0.4508		93.6	70	130	0	0	

Sample ID	ics-36666	SampType:	LCS4	TestCode:	EPA Method 8260B: Volatiles Short List					
Client ID:	BatchQC	Batch ID:	36666	RunNo:	49376					
Prep Date:	2/22/2018	Analysis Date:	2/26/2018	SeqNo:	1594812	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	0.48		0.5000		95.1	70	130			
Surr: Toluene-d8	0.47		0.5000		93.4	70	130			

Sample ID	mb-36666	SampType:	MBLK	TestCode:	EPA Method 8260B: Volatiles Short List					
Client ID:	PBS	Batch ID:	36666	RunNo:	49376					
Prep Date:	2/22/2018	Analysis Date:	2/26/2018	SeqNo:	1594813	Units:	%Rec			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Surr: 4-Bromofluorobenzene	0.56		0.5000		112	70	130			
Surr: Toluene-d8	0.47		0.5000		93.4	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 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 |

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1802D30

27-Feb-18

Client: Blagg Engineering

Project: GCU 235

Sample ID	2.5ug gro lcs	SampType:	LCS	TestCode:	EPA Method 8015D Mod: Gasoline Range					
Client ID:	LCSS	Batch ID:	G49376	RunNo:	49376					
Prep Date:		Analysis Date:	2/26/2018	SeqNo:	1594393	Units:	mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	28	5.0	25.00	0	114	70	130			
Surr: BFB	510		500.0		102	70	130			

Sample ID	rb	SampType:	MBLK	TestCode:	EPA Method 8015D Mod: Gasoline Range					
Client ID:	PBS	Batch ID:	G49376	RunNo:	49376					
Prep Date:		Analysis Date:	2/26/2018	SeqNo:	1594394	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	550		500.0		110	70	130			

### Qualifiers:

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

**Sample Log-In Check List**

Client Name: **BLAGG**

Work Order Number: **1802D30**

RcptNo: **1**

Received By: **Isaiah Ortiz** 2/24/2018 9:25:00 AM

*IO*

Completed By: **Anne Thorne** 2/26/2018 7:23:13 AM

*Anne Thorne*

Reviewed By: *IT* 2/26/18

**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? Yes  No   
 (Note discrepancies on chain of custody)  
 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? Yes  No   
 (If no, notify customer for authorization.)

# 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: NV Date: \_\_\_\_\_  
 By Whom: A Via:  eMail  Phone  Fax  In Person  
 Regarding: Sample ID  
 Client Instructions: Use Sample ID on Sample Jar

16. Additional remarks: As 02/26/18

**Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	0.4	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

Form C-138  
Revised August 1, 2011

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

\*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 235  
Paykey: VHIXONEVRM

**3. Location of Material (Street Address, City, State or ULSTR):**  
QRT/QRT: SE/NW Unit: H Section: 13 T28N R13W

**4. Source and Description of Waste:** Hydrocarbon impacted soil associated with a below grade tank remediation  
Estimated Volume 10 yd<sup>3</sup> / bbls Known Volume (to be entered by the operator at the end of the haul) 10 yd<sup>3</sup> / bbls

**5. GENERATOR CERTIFICATION STATEMENT OF WASTE STATUS**  
Steve Moskal, representative or authorized agent for BP America Production Company do certify that according to the Resource Conservation and Recovery Act (RCRA) and the US Environmental Protection Agency's July 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 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 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 for BP America Production Company authorize IEL to complete the required testing/sign the Generator Waste Testing Certification.

I, Celia S., representative for [redacted] 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

**OCD Permitted Surface Waste Management Facility**

Name and Facility Permit #: Industrial Ecosystems Inc., JFJ Waste Management Facility (JFJ), Permit NM-01-0010B

Address of Facility: #49 CR 3150 Aztec, 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: Celia Sanchez

TITLE: Clerk

DATE: 6/1/18

SIGNATURE: Celia Sanchez  
Surface Waste Management Facility Authorized Agent

TELEPHONE NO.: 505-632-1282

CL-7128  
AT-9

6/1/18

**505-947-9900**

**BP AMERICA PRODUCTION COMPANY  
GALLEGOS CANYON UNIT 235  
API 3004511691 LEASE NMNM78391C  
2240 FNL 995 FEL (H) SEC 13 T28N R13W  
San Juan County ELEV 5632  
LAT 36° 39' 47.988"  
LONG 108° 9' 54.324"**



