

3R - 421

**ANNUAL
MONITORING
REPORT**

4/10/2007

3R421

BLAGG ENGINEERING INC.

P.O. Box 87, Bloomfield, New Mexico 87413
Phone: (505)632-1199 Fax: (505)632-3903

SENT VIA USPS CERTIFIED

April 10, 2007

Mr. Glenn von Gonten, Hydrologist
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

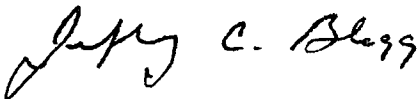
Re: BP America Production Company
Transmittal of Abatement Plan
GCU 229E: (I) Sec. 21 - T28N - R12W, San Juan County, NM

Dear Mr. vonGonten:

On behalf of BP America Production Company, Blagg Engineering, Inc. (BEI) is submitting the attached Abatement Plan for the GCU 229E, (I) Sec. 21 - T28N - R12W, San Juan County, New Mexico pursuant to our correspondence dated March 2, 2007. The plan has been prepared to meet the requirements stipulated in NMOCD Rule 116D.

We welcome your feedback on this plan. If you have questions or need additional information, please contact either myself at (505)632-1199 or Mr. Larry Schlotterback of BP at (505)326-9200.

Respectfully:
Blagg Engineering, Inc.



Jeffrey C. Blagg, P.E.
President

cc: Bill Freeman - NNEPA Shiprock
Brandon Powell - NMOCD Aztec
Larry Schlotterback - BP SJ Op. Ctr.

15482

BP America Production Company

ABATEMENT PLAN

GCU 229E

**(I) Sec. 21 – T28N – R12W
San Juan County, New Mexico**

I. Introduction

A release of hydrocarbons affecting groundwater was discovered at the GCU 229E during investigation of the vertical extent of soil impacts at an abandon historical waste pit site. During this investigation groundwater was encountered at a depth of approximately 29 feet below ground surface. A monitor well was set and sampling on November 14, 2006 identified groundwater impacts exceeding New Mexico Water Quality Control Commission (NMWQCC) standards for volatile hydrocarbons.

The location is in a remote area with no immediate residents, down-gradient surface waters or water wells within a 1-mile radius that could be influenced.

BP intends to investigate the extent of soil and groundwater impacts in order to develop the best available techonolgy for site remediation. Outlined below is an abatement plan designed to meet the requirements of the New Mexico Oil Conservation Division (NMOCD) Rule 116D.

II. Site Investigation/Abatement

A site investigation is proposed to delineate the extent and magnitude of soil and groundwater impacts. A mobile drill rig will be used to collect soil samples and set groundwater monitor wells in and around the known source area. During this work, soil type, groundwater depth and the extent of impacts will be investigated.

The investigation will include testing water quality, gradient and other hydrologic parameters as appropriate. Groundwater monitor wells will be installed to insure that adequate monitoring points are placed up-gradient, in the original source area and down-gradient from the source area.

Initial well testing will be for volatile organics (BTEX) by an appropriate laboratory analytical procedure (U.S. EPA 8021 or 8260) and for cation/anion analysis. If a product sheen is identified during the initial sample event, polynuclear aromatic hydrocarbons (PAH's) will be included in the laboratory testing.

Quality assurance/quality control (QA/QC) will include following standard SW 846 procedures for well development, sample collection, storage and delivery to the laboratory. Chain-of-custody documentation will be included with each sample. Only qualified laboratories with adequate QA/QC processes that follow U.S. EPA protocol will be selected for sample analysis.

Water wells within a 1-mile radius of the site will be identified. Any wells that may be impacted by the release will be sampled and tested for impacts, pending well owner authorization.

Following investigative activities, a report on the investigation will be prepared and include a reclamation plan to complete remediation of impacts. The initial report will summarize site activities. Included with this report will be:

- a. The results of the initial investigation including identification of the water well inventory, a description of the applicable surface and groundwater hydrology and water flow relationships.
- b. Geologic/lithologic logs and well construction diagrams.
- c. Geologic cross sections, as appropriate
- d. Water table contour maps, including the location pertinent site features, depicting the magnitude and direction of the hydraulic gradient
- e. Isopleth maps, as appropriate
- f. Summary tables of water quality testing, including laboratory test reports with QA/QC.
- g. Waste disposition.
- h. Recommendations for future actions, including a proposed reclamation plan, a schedule for future monitor well sampling and a reporting schedule.

III. Summary

BP intends to initiate investigations at the GCU 229E on a proactive basis to determine the extent and magnitude of impacts. Reclamation of these impacts may be instituted prior to completion of the initial investigation, but will not be started without prior authorization from the NMOCD.

BP AMERICA PROD. CO. GROUNDWATER LAB RESULTS

SUBMITTED BY BLAGG ENGINEERING, INC.

GCU # 229E - BLOW PIT
UNIT I, SEC. 21, T28N, R12W

REVISED DATE: FEBRUARY 7, 2007

FILENAME: (29E-1Q07.WK4) NJV

SAMPLE DATE	WELL NAME or No.	D.T.W. (ft)	T.D. (ft)	TDS (mg/L)	COND. umhos	pH	PRODUCT (ft)	BTEX EPA METHOD 8021B (ppb)			
								Benzene	Toluene	Ethyl Benzene	Total Xylene
30-Jan-07	MW #1	34.11	42.00	730	1,200	7.13		ND	ND	ND	ND
14-Nov-06	MW #2	31.60	42.00	866	1,300	7.05		ND	25	110	1,800
30-Jan-07		31.63			1,200	6.96		ND	ND	7.9	200
30-Jan-07	MW #3	33.20	42.00	762	1,200	7.18		ND	ND	ND	ND
NMWQCC GROUNDWATER STANDARDS								10	750	750	620

- NOTES :** 1) RESULTS IN BOLD RED TYPE INDICATE EXCEEDING NMWQCC STANDARDS .
 2) RESULTS IN BOLD BLUE TYPE INDICATE BELOW NMWQCC STANDARDS AFTER PROCEEDING RESULTS EXCEEDED .

GENERAL WATER QUALITY
BP AMERICA PRODUCTION COMPANY

GCU # 229E

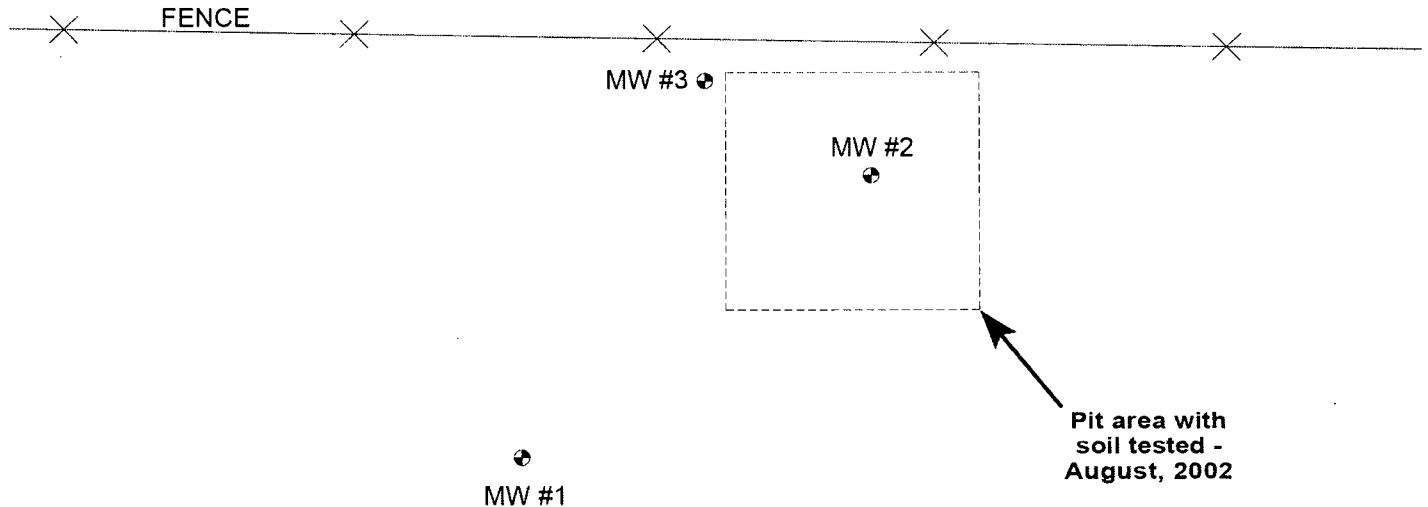
Sample Dates : Nov. 14 , 2006 & Jan. 30 , 2007

PARAMETERS	MW # 1 01/30/07	MW # 2 11/14/06	MW # 3 01/30/07	Units
LAB pH	7.34	7.36	7.51	s. u.
LAB CONDUCTIVITY @ 25 C	1,320	1,230	1,250	umhos / cm
TOTAL DISSOLVED SOLIDS @ 180 C	730	866	762	mg / L
TOTAL DISSOLVED SOLIDS (Calc)	717	840	747	mg / L
SODIUM ABSORPTION RATIO	2.3	2.9	3.3	ratio
TOTAL ALKALINITY AS CaCO ₃	256	288	300	mg / L
TOTAL HARDNESS AS CaCO ₃	356	637	304	mg / L
BICARBONATE as HCO ₃	256	288	300	mg / L
CARBONATE AS CO ₃	< 0.1	< 0.1	< 0.1	mg / L
HYDROXIDE AS OH	< 0.1	< 0.1	< 0.1	mg / L
NITRATE NITROGEN	7.6	15.5	9.5	mg / L
NITRITE NITROGEN	< 0.001	0.65	< 0.001	mg / L
CHLORIDE	39.9	64.0	43.7	mg / L
FLUORIDE	0.37	0.70	0.68	mg / L
PHOSPHATE	0.7	0.2	0.4	mg / L
SULFATE	283	312	264	mg / L
IRON	< 0.001	< 0.01	< 0.001	mg / L
CALCIUM	114	118	102	mg / L
MAGNESIUM	17.1	21.1	12.2	mg / L
POTASSIUM	0.10	0.60	< 0.01	mg / L
SODIUM	98.3	132	132	mg / L
CATION / ANION DIFFERENCE	0.03	0.40	0.07	

FIGURE 1



Direction to
Gallegos wash.



1 INCH = 30 FT.

0 30 60 FT.

⊕
P & A
MARKER

MONITOR WELL LOCATIONS ARE ONLY AS ACCURATE AS THE INSTRUMENTS USED IN OBTAINING THE FOOTAGE & BEARING FROM THE WELL HEAD (TAPE MEASURE, LASER RANGE FINDER, & BRUNTON COMPASS). ALL OTHER STRUCTURES DISPLAYED ON THIS MAP ARE SOLELY FOR REFERENCE AND MAY NOT BE TO SCALE.

BP AMERICA PRODUCTION CO.
GCU #229E
NE/4 SE/4 SEC. 21, T28N, R12W
SAN JUAN COUNTY, NEW MEXICO

BLAGG ENGINEERING, INC.
CONSULTING PETROLEUM / RECLAMATION SERVICES
P.O. BOX 87
BLOOMFIELD, NEW MEXICO 87413
PHONE: (505) 632-1199

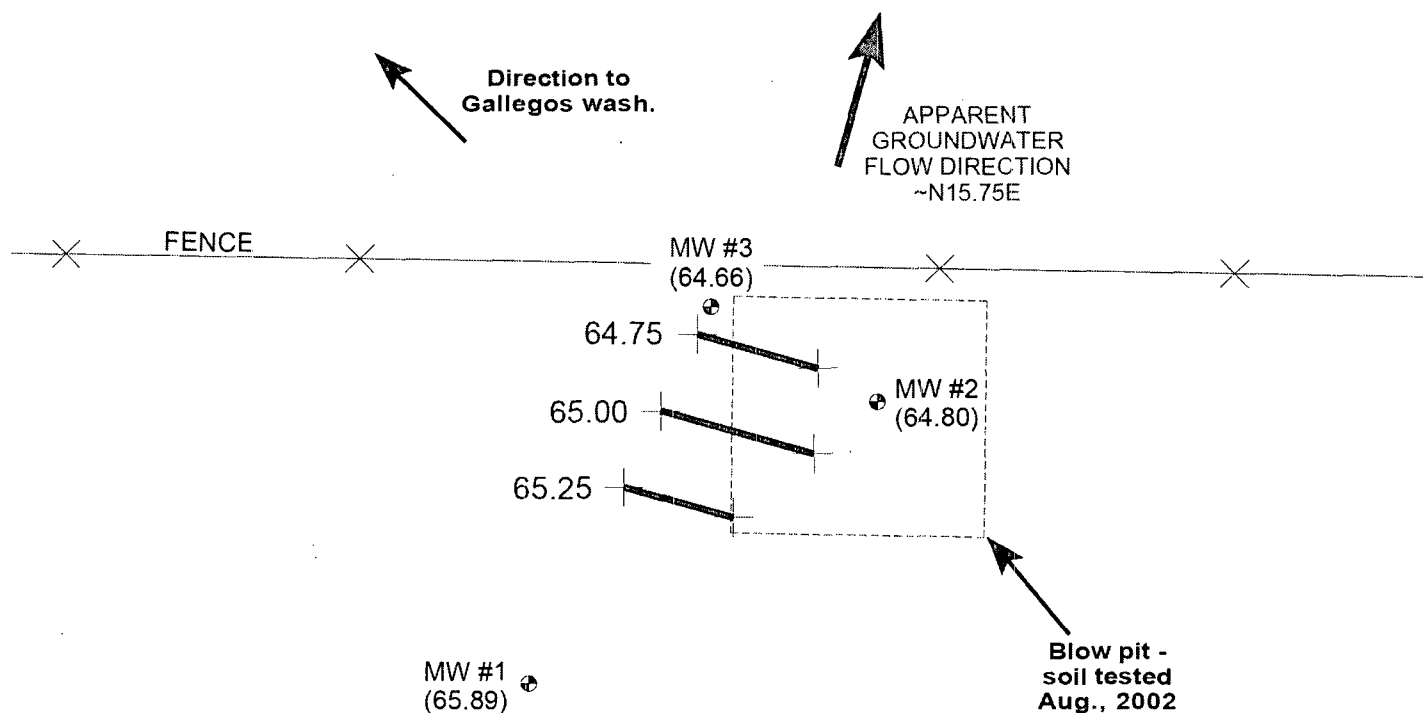
PROJECT: MW INSTALL.
DRAWN BY: NJV
FILENAME: GCU 229E-SM.SKF
DRAFTED: 01-30-07 NJV

SITE
MAP
01/07

FIGURE 2 (1st 1/4, 2007)



OPEN RANGE



1 INCH = 30 FT.

0 30 60 FT.

⊕
P & A
MARKER

	Top of Well Elevation
MW #1	(97.86)
MW #2	(96.43)
MW #3	(102.47)
⊕ MW #1	Groundwater Elevation as of 1/30/07.
(65.89)	

MONITOR WELL LOCATIONS ARE ONLY AS ACCURATE AS THE INSTRUMENTS USED IN OBTAINING THE FOOTAGE & BEARING FROM THE WELL HEAD (TAPE MEASURE, LASER RANGE FINDER, & BRUNTON COMPASS). ALL OTHER STRUCTURES DISPLAYED ON THIS MAP ARE SOLELY FOR REFERENCE AND MAY NOT BE TO SCALE.

BP AMERICA PRODUCTION CO.

GCU #229E

NE/4 SE/4 SEC. 21, T28N, R12W

SAN JUAN COUNTY, NEW MEXICO

BLAGG ENGINEERING, INC.

CONSULTING PETROLEUM / RECLAMATION SERVICES

P.O. BOX 87

BLOOMFIELD, NEW MEXICO 87413

PHONE: (505) 632-1199

PROJECT: MW SAMPLING

DRAWN BY: NJV

FILENAME: 01-30-07-GW.SKF

DRAFTED: 01-31-07 NJV

GROUNDWATER
CONTOUR

MAP

01/07

BLAGG ENGINEERING, Inc.

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

MW #1

BORE / TEST HOLE REPORT

CLIENT: BP AMERICA PRODUCTION CO.
LOCATION NAME: GCU #229E UNIT I, SEC. 21, T28N, R12W
CONTRACTOR: BLAGG ENGINEERING, INC. / ENVIROTECH, INC.
EQUIPMENT USED: MOBILE DRILL RIG (CME 75)
BORING LOCATION: 88 FEET, N16W FROM PLUGGED & ABANDONED MARKER.

BORING #..... BH - 1
MW #..... 1
PAGE #..... 1
DATE STARTED 01/18/07
DATE FINISHED 01/18/07
OPERATOR..... DP
PREPARED BY NJV

DEPTH (FT.)	INTERVAL	LITHOLOGY INTERVAL	MW SCHEMATIC	FIELD CLASSIFICATION AND REMARKS
				GROUND SURFACE
2				TOP OF CASING APPROX. 2.40 FEET ABOVE GRADE.
4				
6				DARK YELLOWISH ORANGE SAND, NON COHESIVE, SLIGHTLY MOIST, FIRM, NO APPARENT HYDROCARBON ODOR DETECTED PHYSICALLY WITHIN CUTTINGS (0.0 - 12.0 FT. BELOW GRADE).
8				
10				
12				PALE BROWN CALICHE, NON TO SLIGHTLY COHESIVE, SLIGHTLY MOIST, FIRM, NO APPARENT HYDROCARBON ODOR DETECTED PHYSICALLY WITHIN CUTTINGS (12.0 - 14.0 FT. BELOW GRADE).
14				
16				
18				
20				MODERATE YELLOWISH BROWN SAND, NON COHESIVE, SLIGHTLY MOIST, FIRM, NO APPARENT HYDROCARBON ODOR DETECTED PHYSICALLY WITHIN CUTTINGS (14.0 - 28.0 FT. BELOW GRADE).
22				
24				
26				
28				SAME AS ABOVE EXCEPT WITH MINOR AMOUNT OF GRAVEL (28.0 - 29.0 FT. BELOW GRADE).
30				SAME AS 14.0 - 28.0 FT. INTERVAL (29.0 - 31.0 FT. BELOW GRADE).
32				DEPTH TO WATER APPROX. 31.81 FT. FROM GROUND SURFACE MEASURED ON 1/19/07.
34				PALE BROWN SAND, NON COHESIVE, WET TO SATURATED, FIRM. NO APPARENT HYDROCARBON ODOR DETECTED PHYSICALLY WITHIN CUTTINGS (31.0 - 40.0 FT. BELOW GRADE).
36				
38				
40				
42				
44				
46				
48				
50				
52				
54				
56				
58				
60				

NOTES:

- SAND.
- CALICHE.
- SAND AND GRAVEL.
- TOS - Top of screen of monitor well.
- TD - Total depth/bottom extent of monitor well.

Monitor well consist of 2 inch PVC piping - casing from 2.40 ft. above grade to 24.60 ft. below grade, 0.010 slotted screen between 24.60 to 39.60 ft. below grade, sand packed annular to 22.0 ft. below grade, bentonite grout between 19.0 to 22.00 ft. below grade, fill dirt between 0.0 to 19.0 ft. below grade. Well protector encompassing above grade casing and secured with padlock.

BLAGG ENGINEERING, Inc.

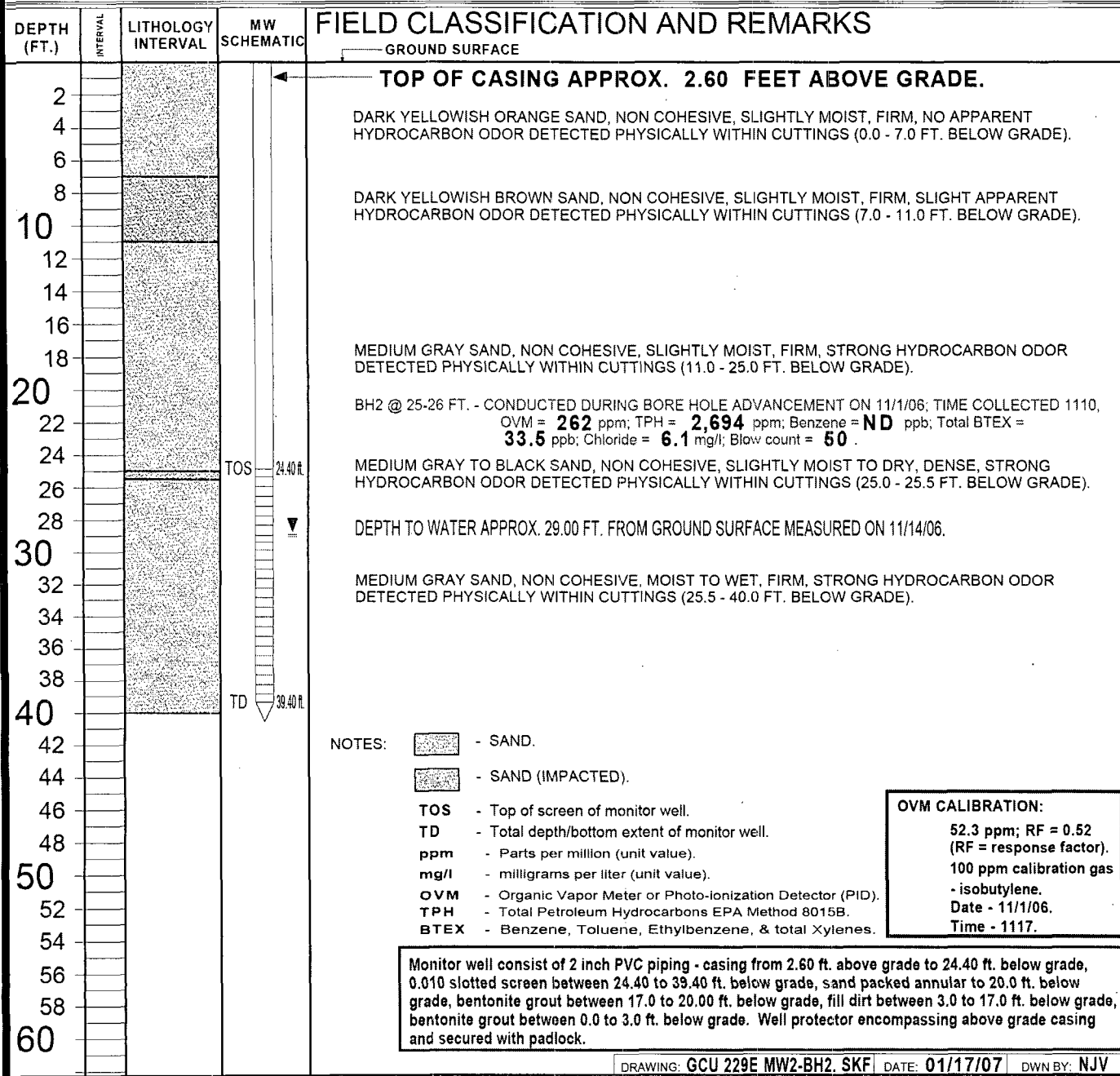
P.O. BOX 87
BLOOMFIELD, NM 87413
(505) 632-1199

MW #2

BORE / TEST HOLE REPORT

CLIENT: BP AMERICA PRODUCTION CO.
LOCATION NAME: GCU #229E UNIT I, SEC. 21, T28N, R12W
CONTRACTOR: BLAGG ENGINEERING, INC. / ENVIROTECH, INC.
EQUIPMENT USED: MOBILE DRILL RIG (CME 75)
BORING LOCATION: 132 FEET, N13E FROM PLUGGED & ABANDONED MARKER.

BORING #..... BH-2
MW #..... 2
PAGE #..... 2
DATE STARTED 11/1/06
DATE FINISHED 11/1/06
OPERATOR..... DP
PREPARED BY NJV



DRAWING: GCU 229E MW2-BH2. SKF DATE: 01/17/07 DWN BY: NJV

Hall Environmental Analysis Laboratory, Inc.

Date: 14-Nov-06

CLIENT:	Blagg Engineering	Client Sample ID:	BH2 @ 25'-26'-Blow Pit
Lab Order:	0611044	Collection Date:	11/1/2006 11:10:00 AM
Project:	GCU #316 (#229E)	Date Received:	11/3/2006
Lab ID:	0611044-01	Matrix:	SOIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE ORGANICS						
Diesel Range Organics (DRO)	2600	100		mg/Kg	10	Analyst: SCC 11/11/2006 11:22:42 AM
Surr: DNOP	171	61.7-135	S	%REC	10	11/11/2006 11:22:42 AM
EPA METHOD 8015B: GASOLINE RANGE						
Gasoline Range Organics (GRO)	94	5.0		mg/Kg	1	Analyst: NSB 11/6/2006 6:01:48 PM
Surr: BFB	413	84.5-129	S	%REC	1	11/6/2006 6:01:48 PM
EPA METHOD 8021B: VOLATILES						
Benzene	ND	0.50		mg/Kg	10	Analyst: NSB 11/6/2006 6:01:48 PM
Toluene	ND	0.50		mg/Kg	10	11/6/2006 6:01:48 PM
Ethylbenzene	2.5	0.50		mg/Kg	10	11/6/2006 6:01:48 PM
Xylenes, Total	31	1.5		mg/Kg	10	11/6/2006 6:01:48 PM
Surr: 4-Bromofluorobenzene	101	76.8-115		%REC	10	11/6/2006 6:01:48 PM
EPA METHOD 9056A: ANIONS						
Chloride	6.1	1.5		mg/Kg	5	Analyst: TES 11/9/2006 3:57:55 PM

Qualifiers:	* Value exceeds Maximum Contaminant Level	B Analyte detected in the associated Method Blank
	E Value above quantitation range	H Holding times for preparation or analysis exceeded
	J Analyte detected below quantitation limits	MCL Maximum Contaminant Level
	ND Not Detected at the Reporting Limit	RL Reporting Limit
	S Spike recovery outside accepted recovery limits	

BLAGG ENGINEERING, Inc.

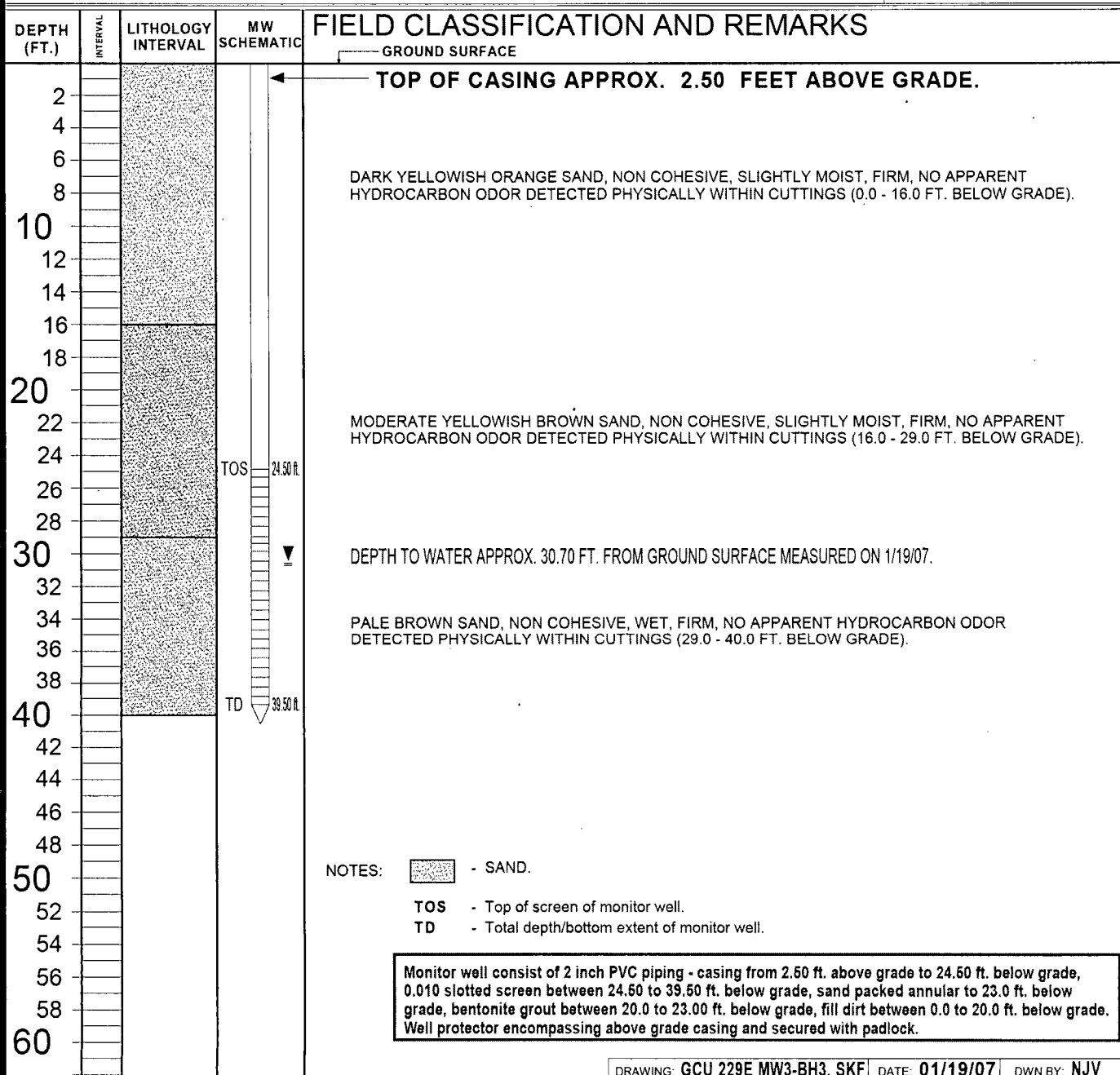
P.O. BOX 87
BLOOMFIELD, NM 87413
(505) 632-1199

MW #3

BORE / TEST HOLE REPORT

CLIENT: BP AMERICA PRODUCTION CO.
LOCATION NAME: GCU #229E UNIT I, SEC. 21, T28N, R12W
CONTRACTOR: BLAGG ENGINEERING, INC. / ENVIROTECH, INC.
EQUIPMENT USED: MOBILE DRILL RIG (CME 75)
BORING LOCATION: 143.5 FEET, N1.5E FROM PLUGGED & ABANDONED MARKER.

BORING #..... BH-3
MW #..... 3
PAGE #..... 3
DATE STARTED 01/18/07
DATE FINISHED 01/18/07
OPERATOR..... DP
PREPARED BY NJV



BLAGG ENGINEERING, INC.

MONITOR WELL DEVELOPMENT & / OR SAMPLING DATA

CLIENT : BP AMERICA PROD. CO.

CHAIN-OF-CUSTODY # : N / A & 14715

GCU #229E - BLOW PIT

UNIT I, SEC. 21, T28N, R12W

LABORATORY (S) USED : HALL ENVIRONMENTAL

ENVIROTECH

Date : November 14, 2006

SAMPLER : N J V

Filename : 11-14-06.WK4

PROJECT MANAGER : N J V

WELL #	WELL ELEV. (ft)	WATER ELEV. (ft)	DEPTH TO WATER (ft)	TOTAL DEPTH (ft)	SAMPLING TIME	pH	CONDUCT (umhos)	TEMP. (celcius)	VOLUME PURGED (gal.)
MW - 2	-	-	31.60	42.00	1200	7.05	1,300	11.6	6.00
INSTRUMENT CALIBRATIONS =						7.00	2,800		
DATE & TIME =						11/14/06	0945		

NOTES : Volume of water purged from well prior to sampling: $V = \pi \times r^2 \times h \times 7.48 \text{ gal./ft}^3 \times 3 \text{ (wellbores)}$
(i.e. 2" MW $r = (1/12) \text{ ft.}$ $h = 1 \text{ ft.}$) (i.e. 4" MW $r = (2/12) \text{ ft.}$ $h = 1 \text{ ft.}$)

Ideally a minimum of three (3) wellbore volumes:

2.00 " well diameter = 0.49 gallons per foot of water.

Comments or note well diameter if not standard 2 "

Excellent recovery . Blackish in appearance , hydrocarbon odor detected physically . Collected samples for BTEX and major anions / cations analyses .

Top of casing MW # 2 ~ 2.60 ft. above grade .

Hall Environmental Analysis Laboratory, Inc.

Date: 21-Nov-06

CLIENT: Blagg Engineering
Lab Order: 0611183
Project: GCU #229E (#316)
Lab ID: 0611183-01

Client Sample ID: MW-2
Collection Date: 11/14/2006 12:00:00 PM
Date Received: 11/15/2006
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Benzene	ND	10		µg/L	10	11/20/2006 4:56:53 PM
Toluene	25	10		µg/L	10	11/20/2006 4:56:53 PM
Ethylbenzene	110	10		µg/L	10	11/20/2006 4:56:53 PM
Xylenes, Total	1800	30		µg/L	10	11/20/2006 4:56:53 PM
Surr. 4-Bromofluorobenzene	100	70.2-105		%REC	10	11/20/2006 4:56:53 PM

Qualifiers: * Value exceeds Maximum Contaminant Level
E Value above quantitation range
J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit
S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

CATION / ANION ANALYSIS

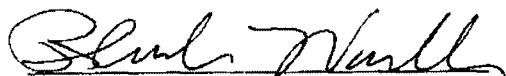
Client: Blagg / BP
Sample ID: MW #2
Laboratory Number: 39151
Chain of Custody: 14715
Sample Matrix: Water
Preservative: Cool
Condition: Cool & Intact

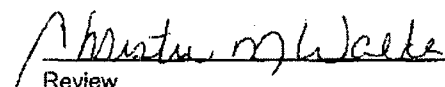
Project #: 94034-010
Date Reported: 11-17-06
Date Sampled: 11-14-06
Date Received: 11-14-06
Date Extracted: N/A
Date Analyzed: 11-15-06

Parameter	Analytical Result	Units		
pH	7.36	s.u.		
Conductivity @ 25° C	1,230	umhos/cm		
Total Dissolved Solids @ 180C	866	mg/L		
Total Dissolved Solids (Calc)	840	mg/L		
SAR	2.9	ratio		
Total Alkalinity as CaCO3	288	mg/L		
Total Hardness as CaCO3	637	mg/L		
Bicarbonate as HCO3	288	mg/L	4.72	meq/L
Carbonate as CO3	<0.1	mg/L	0.00	meq/L
Hydroxide as OH	<0.1	mg/L	0.00	meq/L
Nitrate Nitrogen	15.5	mg/L	0.25	meq/L
Nitrite Nitrogen	0.65	mg/L	0.01	meq/L
Chloride	64.0	mg/L	1.81	meq/L
Fluoride	0.70	mg/L	0.04	meq/L
Phosphate	0.2	mg/L	0.01	meq/L
Sulfate	312	mg/L	6.50	meq/L
Iron	<0.01	mg/L	0.00	meq/L
Calcium	118	mg/L	5.89	meq/L
Magnesium	21.1	mg/L	1.74	meq/L
Potassium	0.60	mg/L	0.02	meq/L
Sodium	132	mg/L	5.74	meq/L
Cations			13.38	meq/L
Anions			13.33	meq/L
Cation/Anion Difference			0.40%	

Reference: U.S.E.P.A., 600/4-79-020, "Methods for Chemical Analysis of Water and Wastes", 1983.
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: GCU #229E (#316) Grab Sample.


Analyst


Review

CHAIN-OF-CUSTODY RECORD

Client: BLAKE ENER./BP AMERICA

Address: P.O. BOX 87

BUFO, NM 87413

Phone #: 632-1199

Fax #:

QA/QC Package:

Std ☐ Level 4 ☐

Other:

Project Name:

6CU # 229E (#316)

Project #:

NV

Project Manager:

NV

Sampler:

NV

Sample Temperature:

10

Date	Time	Matrix	Sample I.D. No.	Number/Volume	Preservative		HEAL No.
					HgCl ₂	HNO ₃	
11/14/06	1200	WATER	MW # 2	2-40ml	✓		010111B3

11/14/06 1200 WATER MW # 2 2-40ml ✓

Date: 11/14/06

Time: 1700

Relinquished By: (Signature)

[Signature]

Date:

Relinquished By: (Signature)

Received By: (Signature)

11/15/06

931

Remarks:

HALL ENVIRONMENTAL
ANALYSIS LABORATORY

4901 Hawkins NE, Suite D
Albuquerque, New Mexico 87109
Tel. 505.345.3975 Fax 505.345.4107
www.hallenvironmental.com

ANALYSIS REQUEST

BTX + MTBE + TPH (Gasoline Only)

(BTX) + MTBE + TMBs (8021B)

TPH Method B015B (Gas/Diesel)

TPH (Method 418.1)

EDB (Method 504.1)

EDC (Method 8021)

B310 (PMA or PAH)

RCRA 8 Metals

Anions (F, Cl, NO₂, NO₃, PO₄, SO₄)

B081 Pesticides / PCB's (B082)

B260B (VDA)

B270 (Semi-VDA)

Air Bubbles or Headspace (Y or N)

1475

san juan reproduction 578-129

BLAGG ENGINEERING, INC.**MONITOR WELL DEVELOPMENT & /OR SAMPLING DATA**CLIENT : **BP AMERICA PROD. CO.**CHAIN-OF-CUSTODY # : **N / A & 14692****GCU # 229E - BLOW PIT
UNIT I, SEC. 21, T28N, R12W**LABORATORY (S) USED : **HALL ENVIRONMENTAL
ENVIROTECH**Date : **January 30, 2007**SAMPLER : **N J V**Filename : **01-30-07.WK4**PROJECT MANAGER : **N J V**

WELL #	WELL ELEV. (ft)	WATER ELEV. (ft)	DEPTH TO WATER (ft)	TOTAL DEPTH (ft)	SAMPLING TIME	pH	CONDUCT (umhos)	TEMP. (celcius)	VOLUME PURGED (gal.)
MW - 1	100.00	65.89	34.11	42.00	1225	7.13	1,200	14.3	4.00
MW - 2	96.43	64.80	31.63	42.00	1335	6.96	1,200	13.7	5.25
MW - 3	97.86	64.66	33.20	42.00	1300	7.18	1,200	14.8	4.25

INSTRUMENT CALIBRATIONS =

7.00 2,800

DATE & TIME =

01/30/07 0830

NOTES : Volume of water purged from well prior to sampling: $V = \pi \times r^2 \times h \times 7.48 \text{ gal./ft}^3 \times 3 \text{ (wellbores)}$
(i.e. 2" MW $r = (1/12) \text{ ft.}$ $h = 1 \text{ ft.}$) (i.e. 4" MW $r = (2/12) \text{ ft.}$ $h = 1 \text{ ft.}$)

Ideally a minimum of three (3) wellbore volumes:

2.00 " well diameter = 0.49 gallons per foot of water.

Comments or note well diameter if not standard 2 "

Excellent recovery all MW's . All contained olive gray appearance . Strong hydrocarbon odor detected physically within purged water from MW # 2 . Collected BTEX from all MW's & major anions / cations from MW # 1 & # 3 .

Top of casing MW # 1 ~ 2.40 ft. , MW # 2 ~ 2.60 ft. , MW # 3 ~ 2.50 ft. above grade .

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Feb-07

CLIENT: Blagg Engineering
Project: GCU #229E (#316)

Lab Order: 0702007

Lab ID: 0702007-01

Collection Date: 1/30/2007 12:25:00 PM

Client Sample ID: MW #1

Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES						Analyst: LMM
Benzene	ND	1.0		µg/L	1	2/2/2007 8:29:56 PM
Toluene	ND	1.0		µg/L	1	2/2/2007 8:29:56 PM
Ethylbenzene	ND	1.0		µg/L	1	2/2/2007 8:29:56 PM
Xylenes, Total	ND	3.0		µg/L	1	2/2/2007 8:29:56 PM
Surr: 4-Bromofluorobenzene	87.0	70.2-105		%REC	1	2/2/2007 8:29:56 PM

Lab ID: 0702007-02

Collection Date: 1/30/2007 1:35:00 PM

Client Sample ID: MW #2

Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES						Analyst: LMM
Benzene	ND	5.0		µg/L	5	2/2/2007 9:02:36 PM
Toluene	ND	5.0		µg/L	5	2/2/2007 9:02:36 PM
Ethylbenzene	7.9	5.0		µg/L	5	2/2/2007 9:02:36 PM
Xylenes, Total	200	15		µg/L	5	2/2/2007 9:02:36 PM
Surr: 4-Bromofluorobenzene	89.1	70.2-105		%REC	5	2/2/2007 9:02:36 PM

Lab ID: 0702007-03

Collection Date: 1/30/2007 1:00:00 PM

Client Sample ID: MW #3

Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES						Analyst: LMM
Benzene	ND	1.0		µg/L	1	2/2/2007 2:49:42 AM
Toluene	ND	1.0		µg/L	1	2/2/2007 2:49:42 AM
Ethylbenzene	ND	1.0		µg/L	1	2/2/2007 2:49:42 AM
Xylenes, Total	ND	3.0		µg/L	1	2/2/2007 2:49:42 AM
Surr: 4-Bromofluorobenzene	85.8	70.2-105		%REC	1	2/2/2007 2:49:42 AM

Qualifiers: * Value exceeds Maximum Contaminant Level
E Value above quantitation range
J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit
S Spike recovery outside accepted recovery limits

B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
MCL Maximum Contaminant Level
RL Reporting Limit

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

CATION / ANION ANALYSIS

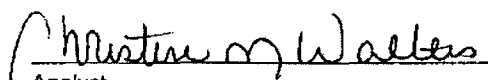
Client: Blagg / BP
Sample ID: MW #1
Laboratory Number: 39878
Chain of Custody: 14692
Sample Matrix: Water
Preservative: Cool
Condition: Cool & Intact

Project #: 94034-010
Date Reported: 01-31-07
Date Sampled: 01-30-07
Date Received: 01-30-07
Date Extracted: N/A
Date Analyzed: 01-31-07

Parameter	Analytical Result	Units		
pH	7.34	s.u.		
Conductivity @ 25° C	1,320	umhos/cm		
Total Dissolved Solids @ 180C	730	mg/L		
Total Dissolved Solids (Calc)	717	mg/L		
SAR	2.3	ratio		
Total Alkalinity as CaCO3	256	mg/L		
Total Hardness as CaCO3	356	mg/L		
Bicarbonate as HCO3	256	mg/L	4.20	meq/L
Carbonate as CO3	<0.1	mg/L	0.00	meq/L
Hydroxide as OH	<0.1	mg/L	0.00	meq/L
Nitrate Nitrogen	7.6	mg/L	0.12	meq/L
Nitrite Nitrogen	<0.001	mg/L	0.00	meq/L
Chloride	39.9	mg/L	1.13	meq/L
Fluoride	0.37	mg/L	0.02	meq/L
Phosphate	0.7	mg/L	0.02	meq/L
Sulfate	283	mg/L	5.89	meq/L
Iron	<0.001	mg/L	0.00	meq/L
Calcium	114	mg/L	5.69	meq/L
Magnesium	17.1	mg/L	1.41	meq/L
Potassium	0.10	mg/L	0.00	meq/L
Sodium	98.3	mg/L	4.28	meq/L
Cations			11.37	meq/L
Anions			11.38	meq/L
Cation/Anion Difference			0.03%	

Reference: U.S.E.P.A., 600/4-79-020, "Methods for Chemical Analysis of Water and Wastes", 1983.
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: GCU #229E (#316)


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

CATION / ANION ANALYSIS

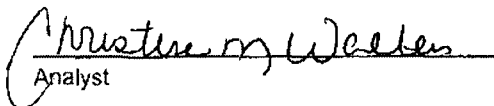
Client: Blagg / BP
Sample ID: MW #3
Laboratory Number: 39879
Chain of Custody: 14692
Sample Matrix: Water
Preservative: Cool
Condition: Cool & Intact

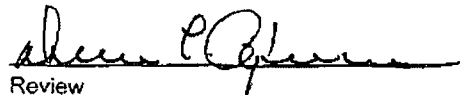
Project #: 94034-010
Date Reported: 01-31-07
Date Sampled: 01-30-07
Date Received: 01-30-07
Date Extracted: N/A
Date Analyzed: 01-31-07

Parameter	Analytical Result	Units		
pH	7.51	s.u.		
Conductivity @ 25° C	1,250	umhos/cm		
Total Dissolved Solids @ 180C	762	mg/L		
Total Dissolved Solids (Calc)	747	mg/L		
SAR	3.3	ratio		
Total Alkalinity as CaCO3	300	mg/L		
Total Hardness as CaCO3	304	mg/L		
Bicarbonate as HCO3	300	mg/L	4.92	meq/L
Carbonate as CO3	<0.1	mg/L	0.00	meq/L
Hydroxide as OH	<0.1	mg/L	0.00	meq/L
Nitrate Nitrogen	9.5	mg/L	0.15	meq/L
Nitrite Nitrogen	<0.001	mg/L	0.00	meq/L
Chloride	43.7	mg/L	1.23	meq/L
Fluoride	0.68	mg/L	0.04	meq/L
Phosphate	0.4	mg/L	0.01	meq/L
Sulfate	264	mg/L	5.50	meq/L
Iron	<0.001	mg/L	0.00	meq/L
Calcium	102	mg/L	5.09	meq/L
Magnesium	12.2	mg/L	1.00	meq/L
Potassium	<0.01	mg/L	0.00	meq/L
Sodium	132	mg/L	5.75	meq/L
Cations			11.84	meq/L
Anions			11.85	meq/L
Cation/Anion Difference			0.07%	

Reference: U.S.E.P.A., 600/4-79-020, "Methods for Chemical Analysis of Water and Wastes", 1983.
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: GCU #229E (#316)


Analyst


Review

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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-144
June 1, 2004

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

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☒ No ☐

Type of action: Registration of a pit or below-grade tank ☐ Closure of a pit or below-grade tank ☒

Operator: <u>BP AMERICA PROD. CO.</u> Telephone: <u>(505)-326-9200</u> e-mail address: _____		
Address: <u>200 ENERGY COURT, FARMINGTON, NM 87410</u>		
Facility or well name: <u>GCU #229E</u> API #: <u>30-045- 23900</u> U/L or Qtr/Qtr <u>I</u> Sec <u>21</u> T <u>28N</u> R <u>12W</u>		
County: <u>SAN JUAN</u> Latitude <u>36.64548</u> Longitude <u>108.11172</u> NAD: 1927 <input type="checkbox"/> 1983 <input checked="" type="checkbox"/> Surface Owner Federal <input type="checkbox"/> State <input type="checkbox"/> Private <input type="checkbox"/> Indian <input checked="" type="checkbox"/>		
Pit Type: Drilling <input type="checkbox"/> Production <input checked="" type="checkbox"/> Disposal <input type="checkbox"/> <u>BLOW</u> Workover <input type="checkbox"/> Emergency <input type="checkbox"/> Lined <input type="checkbox"/> Unlined <input checked="" type="checkbox"/> Liner type: Synthetic <input type="checkbox"/> Thickness _____ mil Clay <input type="checkbox"/> Pit Volume _____ bbl	Below-grade tank Volume: _____ bbl Type of fluid: _____ Construction material: <u>NA</u> Double-walled, with leak detection? Yes <input type="checkbox"/> If not, explain why not: _____	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet (20 points) 50 feet or more, but less than 100 feet (10 points) 100 feet or more (0 points)	20
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes (20 points) No (0 points)	0
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet (20 points) 200 feet or more, but less than 1000 feet (10 points) 1000 feet or more (0 points)	0
Ranking Score (Total Points)		20

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if you are burying in place) onsite ☒ offsite ☐ If offsite, name of facility _____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☒ If yes, show depth below ground surface 29 ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments: <u>PIT LOCATED APPROXIMATELY 129 FT. N12E FROM WELL HEAD.</u>
<u>PIT EXCAVATION: WIDTH NA ft., LENGTH NA ft., DEPTH NA ft.</u>
<u>PIT REMEDIATION: CLOSE AS IS: <input type="checkbox"/>, LANDFARM: <input type="checkbox"/>, COMPOST: <input type="checkbox"/>, STOCKPILE: <input type="checkbox"/>, OTHER <input checked="" type="checkbox"/> (explain) <u>MONITORING</u></u>
Cubic yards: <u>NA</u>
<u>ESTABLISH VERTICAL EXTENT. GROUNDWATER IMPACTED.</u>

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☒, a general permit ☐, or an alternative OCD-approved plan ☒.

Date: 12/01/06

Printed Name/Title Jeff Blagg - P.E. # 11607 Signature Jeff Blagg

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title _____ Signature _____ Date: _____

VUL

3004523900

CLIENT: <u>BP</u>	BLAGG ENGINEERING, INC. P.O. BOX 87, BLOOMFIELD, NM 87413 (505) 632-1199	LOCATION NO: <u>81029</u> C.O.C. NO: <u>10079</u>
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FIELD REPORT: PIT CLOSURE VERIFICATION

PAGE No: 1 of 1

LOCATION: NAME: <u>GCN</u>	WELL #: <u>229E</u> TYPE: <u>BLOW</u>	DATE STARTED: <u>8/2/02</u>
QUAD/UNIT: <u>I</u> SEC: <u>21</u> TWP: <u>28N</u>	RNG: <u>12W</u> PM: <u>NM</u> CNTY: <u>JS</u> ST: <u>NM</u>	DATE FINISHED: _____
QTR/PLUTAGE: <u>1820'S/1080'E</u>	NEISE CONTRACTOR: <u>LGL (SEOR)</u>	ENVIRONMENTAL SPECIALIST: <u>NV</u>

EXCAVATION APPROX. _____ FT. x _____ FT. x _____ FT. DEEP.	CUBIC YARDAGE: _____
DISPOSAL FACILITY: <u>ON-SITE</u>	REMEDIALATION METHOD: _____
LAND USE: <u>RANGE -</u>	NAPI LEASE: <u>NM 078391A</u> FORMATION: <u>OK</u>

FIELD NOTES & REMARKS: PIT LOCATED APPROXIMATELY <u>129</u> FT. <u>NW</u> FROM WELLHEAD.		
DEPTH TO GROUNDWATER: <u><50'</u>	NEAREST WATER SOURCE: <u>>1000'</u>	NEAREST SURFACE WATER: <u>>1000'</u>
NMDCD RANKING SCORE: <u>20</u>	NMDCD TPH CLOSURE STD: <u>100</u> PPM	

SOIL AND EXCAVATION

DESCRIPTION:

SOIL TYPE: <u>(SAND)</u> / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER _____	DVM CALIB. READ: <u>53.4</u> ppm
SOIL COLOR: <u>PALE YELL. BROWN TO OLIVE-MED GRAY</u>	DVM CALIB. GAS = <u>100</u> ppm RT: <u>0.52</u>
COHESION (ALL OTHERS): <u>(NON COHESIVE)</u> / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE	TIME: <u>11:00</u> Cmpm DATE: <u>7/30/02</u>
CONSISTENCY (NON COHESIVE SOILS): <u>(LOOSE)</u> / <u>(FIRM)</u> / DENSE / VERY DENSE	
PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC	
DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD	
MOISTURE: DRY / <u>(SLIGHTLY MOIST)</u> / MOIST / WET / SATURATED / SUPER SATURATED	
DISCOLORATION/STAINING OBSERVED: <u>YES</u> / NO EXPLANATION: <u>BETWEEN PT SURFACE TO 12-14' BELOW GRADE</u>	
HC ODOR DETECTED: <u>YES</u> / NO EXPLANATION: <u>TEST HOLE & DVM SAMPLE</u>	
SAMPLE TYPE: <u>(GRAB)</u> / COMPOSITE - # OF PTS. _____	
ADDITIONAL COMMENTS: <u>VERTICAL EXTENT NEEDS TO BE ESTABLISHED.</u>	

SCALE

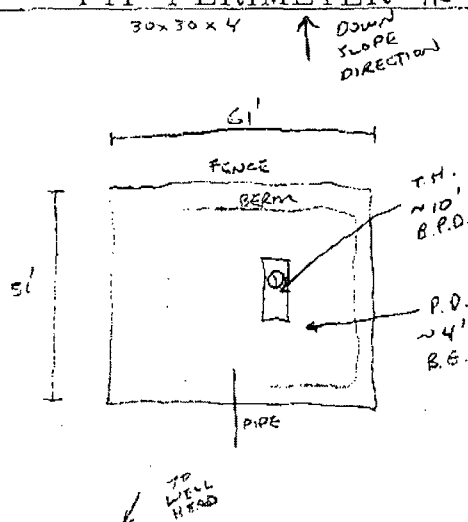


0 FT

FIELD 418.1 CALCULATIONS

SAMP. TIME	SAMPLE I.D.	LAB No:	WEIGHT (g)	mL. FREON	DILUTION	READING	CALC. ppm

PIT PERIMETER



OVM RESULTS

SAMPLE ID	FIELD HEADSPACE PHD (ppm)	TIME
1 @ 14'	375	
2 @		
3 @		
4 @		
5 @		
BH1 @ 18-19'	383	0833
BH1 @ 25-26'	305	0903

5/2/03

OVM CALIB.
53.1 0840

LAB SAMPLES

SAMPLE ID	ANALYSIS	TIME
DE 14'	TPH (80158)	0847
"	BTEX (80218)	"
TPH - FAILED		
BTEX - PASSED		

P.D. = PIT DEPRESSION; B.G. = BELOW GRADE
T.H. = TEST HOLE; ~ = APPROX.; B = BELOWTRAVEL NOTES: CALL OUT: 8/1/02 - AFTER ONSITE: 8/2/02 - MORN.

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

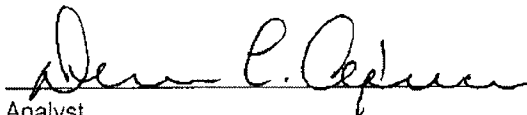
Client:	Blagg / BP	Project #:	94034-010
Sample ID:	1 @ 14'	Date Reported:	08-05-02
Laboratory Number:	23454	Date Sampled:	08-02-02
Chain of Custody No:	10079	Date Received:	08-02-02
Sample Matrix:	Soil	Date Extracted:	08-05-02
Preservative:	Cool	Date Analyzed:	08-05-02
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

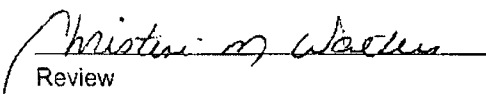
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	366	0.2
Diesel Range (C10 - C28)	779	0.1
Total Petroleum Hydrocarbons	1,150	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: GCU #229E Blow Pit Grab Sample.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	Blagg / BP	Project #:	94034-010
Sample ID:	1 @ 14'	Date Reported:	08-05-02
Laboratory Number:	23454	Date Sampled:	08-02-02
Chain of Custody:	10079	Date Received:	08-02-02
Sample Matrix:	Soil	Date Analyzed:	08-05-02
Preservative:	Cool	Date Extracted:	08-05-02
Condition:	Cool & Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	77.7	1.8
Toluene	867	1.7
Ethylbenzene	948	1.5
p,m-Xylene	1,490	2.2
o-Xylene	1,590	1.0
Total BTEX	4,970	

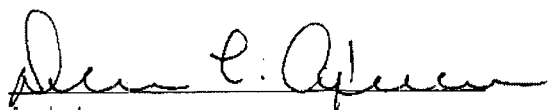
ND - Parameter not detected at the stated detection limit.

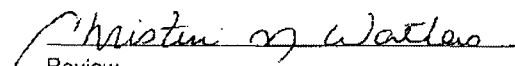
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	99 %
	1,4-difluorobenzene	99 %
	Bromochlorobenzene	99 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: GCU #229E Blow Pit Grab Sample.


Analyst


Review