

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

Form C-144  
July 21, 2008

**For temporary pits, closed-loop systems, and below-grade tanks,** submit to the appropriate NMOCD District Office.  
**For permanent pits and exceptions** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Closed-Loop System, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

11271  
Revised

Type of action: ☐ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  
☒ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request**

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: WILLIAMS PRODUCTION COMPANY, LLC OGRID #: 120782  
Address: PO Box 640 Aztec, NM 87410  
Facility or well name: ROSA UNIT #088  
API Number: 3004525140 OCD Permit Number: \_\_\_\_\_  
Section 8E Township 31N Range 06W County SAN JUAN  
Latitude: 36.91669999999999 Longitude 107.4915 NAD: 1983 Surface Owner: FEDERAL

2.  
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

RCVD JUN 10 '13  
OIL CONS. DIV.  
DIST. 3

3.  
☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC  
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)  
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other \_\_\_\_\_  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_

4.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 120 bbl Type of fluid: PRODUCED WATER  
Tank Construction material: DBL WALL STEEL  
☒ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

5.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.
**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)

☐ Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
☐ Alternate. Please specify \_\_\_\_\_

7.
**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

☐ Screen ☐ Netting ☐ Other \_\_\_\_\_
☐ Monthly inspections (If netting or screening is not physically feasible)

8.
**Signs:** Subsection C of 19.15.17.11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
☐ Signed in compliance with 19.15.3.103 NMAC

9.
**Administrative Approvals and Exceptions:**
Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

*Please check a box if one or more of the following is requested, if not leave blank:*

☐ Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.
☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.
**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

*Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.*

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.	<input type="checkbox"/> Yes <input type="checkbox"/> No
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Topographic map; Visual inspection (certification) of the proposed site	
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	<input type="checkbox"/> Yes <input type="checkbox"/> No
(Applies to temporary, emergency, or cavitation pits and below-grade tanks)	<input type="checkbox"/> NA
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	<input type="checkbox"/> Yes <input type="checkbox"/> No
(Applies to permanent pits)	<input type="checkbox"/> NA
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.	<input type="checkbox"/> Yes <input type="checkbox"/> No
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	
Within 500 feet of a wetland.	<input type="checkbox"/> Yes <input type="checkbox"/> No
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	
Within the area overlying a subsurface mine.	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	
Within an unstable area.	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	
Within a 100-year floodplain.	<input type="checkbox"/> Yes <input type="checkbox"/> No
- FEMA map	

11.

**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  
☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC  
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☒ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC  
☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**Closed-loop Systems Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9  
☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC  
☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_  
☐ Previously Approved Operating and Maintenance Plan API Number: \_\_\_\_\_ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Climatological Factors Assessment  
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Quality Control/Quality Assurance Construction and Installation Plan  
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan  
☐ Emergency Response Plan  
☐ Oil Field Waste Stream Characterization  
☐ Monitoring and Inspection Plan  
☐ Erosion Control Plan  
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14.

**Proposed Closure:** 19.15.17.13 NMAC**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Closed-loop System  
☐ Alternative  
 Proposed Closure Method: ☒ Waste Excavation and Removal  
☐ Waste Removal (Closed-loop systems only)  
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)  
☐ In-place Burial ☐ On-site Trench Burial  
☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  
☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC  
☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  
☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC  
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)**Instructions:** Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_ Disposal Facility Permit Number: \_\_\_\_\_

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?☐ Yes (If yes, please provide the information below) ☐ No

Required for impacted areas which will not be used for future service and operations:

☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 50 feet below the bottom of the buried waste.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Ground water is between 50 and 100 feet below the bottom of the buried waste

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Ground water is more than 100 feet below the bottom of the buried waste.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

18.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_

Telephone: \_\_\_\_\_

20.

**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: \_\_\_\_\_

Approval Date: 6/27/2013Title: Compliance Officer

OCD Permit Number: \_\_\_\_\_

21.

**Closure Report (required within 60 days of closure completion):** Subsection K of 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

☒ Closure Completion Date: 4/1/2013

22.

**Closure Method:**

☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)  
☐ If different from approved plan, please explain.

23.

**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**

*Instructions: Please identify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.*

Disposal Facility Name: \_\_\_\_\_

Disposal Facility Permit Number: \_\_\_\_\_

Disposal Facility Name: \_\_\_\_\_

Disposal Facility Permit Number: \_\_\_\_\_

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

*Required for impacted areas which will not be used for future service and operations:*

- ☐ Site Reclamation (Photo Documentation)  
☐ Soil Backfilling and Cover Installation  
☐ Re-vegetation Application Rates and Seeding Technique

24.

**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Proof of Closure Notice (surface owner and division)  
☐ Proof of Deed Notice (required for on-site closure)  
☐ Plot Plan (for on-site closures and temporary pits)  
☐ Confirmation Sampling Analytical Results (if applicable)  
☐ Waste Material Sampling Analytical Results (required for on-site closure)  
☐ Disposal Facility Name and Permit Number  
☐ Soil Backfilling and Cover Installation  
☐ Re-vegetation Application Rates and Seeding Technique  
☐ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983

25.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Vanessa FieldsTitle: EH&S Coordinator

Signature: \_\_\_\_\_

Date: 6/7/2013e-mail address: vanessa.fields@wpenergy.comTelephone: 505-333-1880

**WPX ENERGY Production Co., LLC**  
**San Juan Basin: New Mexico Assets**  
Below-Grade Tank Removal  
Closure Report

**Well:** (Rosa Unit #088)  
**API No:** 3004525140  
**Location:** E S08 T31N R06W

In accordance with Rule 19.15.17.13 NMAC, the following report describes the general closure of the referenced below-grade tanks (BGT) on WPX ENERGY Production Co, LLC (WPX) location in the San Juan Basin of New Mexico. The closure follows this WPX's standard closure procedure for all BGTs regulated under Rule 19.15.17 NMAC and operated by WPX. For those closures which do not conform to the standard closure plan, a separate well/pit specific closure plan will be developed and utilized.

**Closure Conditions and Timing:**

Pursuant to 19.15.17.13 (A) NMAC, WPX will initiate closure of any BGT should any one of these conditions occur:

- The Division requires closure because of imminent danger to fresh water, public health or the environment.
- The integrity of the BGT fails. Notification will be within 48 hours to the Division and closure will be schedule as specified in 19.15.17.12 (A)(5) NMAC.
- WPX chooses to take the BGT out-of-service due to operational needs. Closure under these conditions will be initiated within 60 days of cessation of the BGT's operation.
- BGTs installed prior to June 16, 2008 that do not meet the requirements under 19.15.17.11.1(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

**General Plan Requirements:**

1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current landowner of record. The landowner of record will be notified of the intent to closure the BGT by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the landowner of record will be notified as soon as practical.

Williams notified the SMA of its intent to clean close the BGT via Certified Mail on March 10, 2009 see attached. No return receipt required per BLM:FFO/NMOCD MOU dated 5/4/09.

2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)

Aztec District office was notified of WPX's E&P intent to close on (March, 15, 2013).

3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank ...). The well will be temporarily shutin until the rerouting is completed.
4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle

Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).

Produced water in the BGT prior to closures was removed by vacuum truck and hauled to the Rosa Unit disposal wells listed.

5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).

No solids or sludge required removal prior to excavation and removal of the tank.

6. WPX ENERGY will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of paragraph 1 subsection D or 19.15.9.712 NMAC. Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426.

The fiberglass tank and plastic liner was disposed of at the San Juan Regional Landfill copy of the disposal ticket is attached.

7. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from the location.

The fiberglass tank and plastic liner were removed offsite. All other piping and equipment also removed for collocated well. See attached photo.

8. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(E)(4) NMAC as identified in Table 1. Grab samples will be collected from any area that is wet, discolored or showing other evidence of a release. Results will be report to the Division following receipt from the lab on Form C-141.

Table 1: Closure Criteria for BGTs

Components	Testing Methods	Closure Limits (mg/Kg)	Sample Results (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2	ND
BTEX	EPA SW-846 Method 8021B or 8260B	50	ND
TPH	EPA SW-846 Method 418.1 <sup>(1)</sup>	100	ND
Chlorides	EPA SW-846 Method 300.1 <sup>(1)</sup>	250 <sup>(2)</sup>	25.4

<sup>(1)</sup> Method modified for solid waste.

<sup>(2)</sup> If background concentration of Chlorides greater than 250 mg/Kg, then higher concentration will be used for closure.

9. If the Division and/or WPX ENERGY determine there is a release, WPX ENERGY will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.

Release Detected see C-141 in compliance with 15.3.116 NMAC and 19.15.1.19 NMAC

10. Upon completion of the tank removal, and any necessary soil remediation, the excavation will be backfilled with non-waste earthen material compacted to native and covered with a minimum of one foot of top soil or background thickness. The surface will be recontoured to match the native grade.

Pit area backfilled with clean earthen material following sample results. No contaminated soil taken off site. Backfill compacted to avoid settling and pit area remains in use for production operations.

11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three

native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. Note: WPX assumes the seeding stipulations including mix and seeding methods specified by the Surface Management Agency (BLM, BOR, USFS, Tribal, etc.) APD are Division-approved methods unless notified by the Division of their unacceptability. If a landowner agreement requires reseeding or other surface restoration that does not meet the revegetation requirements of 19.15.17.13. , I then WPX will submit the proposed alternative with written documentation that the landowner agrees to the alternative, for Division approval.

Pit area along with unused portions of well pad interim reclaimed and following P&A entire location to be reclaimed and recontoured in accordance with Surface Management Agency requirements in APD-COAs and per BLM:FFO/NMOCD MOU dated 5/4/09.

12. For those portions of the former pit area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

See above notes.

#### **Closure Report:**

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using Division Form C-144. The Report will include the following:

- |   |   |
|---|---|
| • Proof of Closure Notice (surface owner & NMOCD) | • Confirmation Sampling Analytical Results            |
| • Backfilling & Cover Installation                | • Disposal Facility Name(s) and Permit Number(s)      |
| • Site Diagram with coordinates                   | • Re-vegetation Application Rate & Seeding techniques |
| • Available Inspection reports                    | • Photo Documentation of Reclamation                  |



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

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

### Release Notification and Corrective Action

#### OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	WPX Energy LLC.	Contact	Vanessa Fields
Address	P.O. BOX 640, AZTEC, NM 87410	Telephone No.	(505) 333-1880
Facility Name	Rosa Unit #088	Facility Type	Well Site
Surface Owner	Federal	Mineral Owner	
		Lease No.	

#### LOCATION OF RELEASE


Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
E	08	31N	06W					

Latitude 36.91670 Longitude 107.49150

#### NATURE OF RELEASE

Type of Release	No Release Detected	Volume of Release	NA	Volume Recovered	NA
Source of Release		Date and Hour of Occurrence		Date and Hour of Discovery	NA
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	NA		
By Whom?		Date and Hour			
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	NA		
If a Watercourse was Impacted, Describe Fully.* NA					
Describe Cause of Problem and Remedial Action Taken.*  NA					
Describe Area Affected and Cleanup Action Taken.*  NA					

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: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Vanessa Fields		Approved by District Supervisor:	
Title: EH&S Coordinator		Approval Date:	Expiration Date:
E-mail Address: Vanessa.fields@wpxenergy.com		Conditions of Approval:	
Date: 6-7-2013 Phone: (505) 333-1880		Attached <input type="checkbox"/>	

\* Attach Additional Sheets If Necessary

**Jones, Brad A., EMNRD**

---

**From:** Meador, Tasha [Tasha.Meador@Williams.com]  
**Sent:** Friday, April 30, 2010 8:44 AM  
**To:** Jones, Brad A., EMNRD  
**Cc:** Lane, Myke; Lucero, Christopher; Powell, Brandon, EMNRD  
**Subject:** Request for Review Pit Closure - Rosa 88, Rosa 117, Rosa 138

Brad:

We need to take the following below grade tanks out of service, and we would like to close these existing BGTs. We request your review and approval to allow closure.

<b>WELLSITE</b>	<b>API</b>	<b>FMT</b>	<b>SEC</b>	<b>TWN</b>	<b>RNG</b>
Rosa #88	3004525140	Blanco MV	8E	31N	06W
Rosa #117	3004526046	Gallup	33D	32N	06W
Rosa #138	3004529147	Blanco MV	17I	31N	06W

Please contact me or Myke Lane if there are any problems or you request additional information. Thanks for your consideration

***Tasha Meador***

**EH&S Coordinator**  
**Williams Exploration & Production**  
**721 S Main Aztec, NM**  
**Office: 505-634-4200**  
**Direct: 505-634-4241**  
**Fax: 505-634-4205**  
**tasha.meador@williams.com**



Exploration & Production  
PO Box 640  
Aztec, NM 81137  
505/634-4219  
505/634-4214 Fax

March 10, 2009

Mr. Bob Jones  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Sent via Certified Mail

RE: Notification of Production Pit Closure  
Rule 19.15.17.13 NMAC  
Production Pits associated Natural Gas Development  
Operated by Williams Production Co, LLC

Pursuant to Rule 19.15.17.13 NMAC, this correspondence is to notify the New Mexico Oil Conservation Division of Williams Production LLC's (Williams') intent to clean close all production pits on State lands in San Juan County, New Mexico. Closure will follow the plan included with this correspondence.

Thanks for your consideration. If there are any questions or additional information is requested, please contact me at (505) 634-4209.

Respectfully submitted,

Holly C. Perkins  
EH&S Specialist

Encl: Williams Production Pit Inventory (Tribal wells)  
San Juan Basin - New Mexico Assets: Below-Grade Tank Closure Plan

cc: Environmental File

WELLS w/FEDERAL SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	CONSTRUCTION MATERIAL
ROSA UNIT #079	3003922539	BASIN DK / BLANCO MV	22K	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #079	3003922539	BASIN DK / BLANCO MV	22K	31N	06W	SGT	DBL WALL STEEL
ROSA UNIT #079A	3003925412	BLANCO MV / ROSA PC	22E	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #079B	3003926920	BASIN DK / BLANCO MV	22C	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #079C	3003929902	BLANCO MV	31P	31N	05W	BGT	DBL WALL STEEL
ROSA UNIT #080	3003922537	BASIN DK / BLANCO MV	8K	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #080A	3003926413	BLANCO MV	8F	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #085	3003922778	BASIN DK	20A	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #085	3003922778	BLANCO MV	20A	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #085A	3003926314	BLANCO MV	20C	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #085B	3003930130	BLANCO MV	20D	31N	05W	BGT	DBL WALL STEEL
ROSA UNIT #086	3003922766	UNDES GL BLANCO MV /	12W	31N	04W	SGT	SINGLE WALL STEEL
ROSA UNIT #088	3004525140	ROSA PC	8E	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #089	3003922782	BLANCO MV	34A	32N	06W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #089A	3003925512	BLANCO MV	34O	32N	06W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #089B	3003926851	BLANCO MV	34I	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #089C	3003926674	BLANCO MV	34G	32N	06W	SGT	SINGLE WALL STEEL
ROSA UNIT #090 COM	3004525370	BLANCO MV	33G	32N	06W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #090A COM	3004529259	BLANCO MV	33G	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #091	3003922780	BLANCO MV	35H	32N	06W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #091A	3003925790	BLANCO MV	35O	32N	06W	SGT	DBL WALL STEEL
ROSA UNIT #091B	3003926684	BLANCO MV	35P	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #091C	3003926991	BLANCO MV	35G	32N	06W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #098	3003923265	BASIN DK / GL BASIN DK /	23L	31N	06W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #100B	3003929547	BLANCO MV	21O	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #100C	3003929851	BLANCO MV	21K	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #100E	3003925135	BLANCO MV / ROSA PC	21I	31N	06W	SGT	SINGLE WALL STEEL
ROSA UNIT #101M	3003925577	BLANCO MV	24F	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #10E	3003923506	BASIN DK / GL	7G	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER

**Williams Production Co., LLC**  
**San Juan Basin: New Mexico Assets**  
Below-Grade Tank Removal  
Closure Plan

In accordance with Rule 19.15.17.13 NMAC, the following plan describes the general closure requirements of below-grade tanks (BGT) on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico. This is WPX's standard closure procedure for all BGTs regulated under Rule 19.15.17 NMAC and operated by WPX. For those closures which do not conform to this standard closure plan, a separate well/pit specific closure plan will be developed and utilized.

**Closure Conditions and Timing:**

Pursuant to 19.15.17.13 (A) NMAC, WPX will initiate closure of any BGT should any one of these conditions occur:

- The Division requires closure because of imminent danger to fresh water, public health or the environment.
- The integrity of the BGT fails. Notification will be within 48 hours to the Division and closure will be schedule as specified in 19.15.17.12 (A)(5) NMAC.
- WPX chooses to take the BGT out-of-service due to operational needs. Closure under these conditions will be closed within 60 days of cessation of the BGT's operation.
- BGTs installed prior to June 16, 2008 that do not meet the requirements under 19.15.17.11.1(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

**General Plan Requirements:**

1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current surface owner of record. The surface owner of record will be notified of the intent to close the BGT by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner of record will be notified as soon as practical.
2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)
3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shut in until the rerouting is completed.
4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).
5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).
6. WPX will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liner materials will

be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of paragraph 1 subsection D of 19.15.9.712 NMAC. Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426.

7. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from the location.
8. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(E)(4) NMAC as identified in Table 1. Grab samples will be collected from any area that is wet, discolored or showing other evidence of a release. Results will be report to the Division following receipt from the lab on Form C-141.

Table 1: Closure Criteria for BGTs

Components	Testing Methods	Closure Limits (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2
BTEX	EPA SW-846 Method 8021B or 8260B	50
TPH	EPA SW-846 Method 418.1 <sup>(1)</sup>	100
Chlorides	EPA SW-846 Method 300.1 <sup>(1)</sup>	250 <sup>(2)</sup>

<sup>(1)</sup> Method modified for solid waste.

<sup>(2)</sup> If background concentration of Chlorides greater than 250 mg/Kg, then higher concentration will be used for closure.

9. If the Division and/or WPX determine there is a release, WPX will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.
10. Upon completion of the tank removal, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot of top soil or background thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and prevent ponding.
11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. *Note: If a surface owner agreement requires reseeding or other surface restoration that do not meet re-vegetation requirements of 19.15.17.13.1 NMAC then WPX will submit the proposed alternative with written documentation that the surface owner agrees to the alternative, for Division approval.*
12. For those portions of the former pit area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

#### Closure Report:

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using Division Form C-144. The Report will include the following:

- Proof of Closure Notice (surface owner & NMOCD)
- Backfilling & Cover Installation
- Site Diagram with coordinates
- Available Inspection reports
- Confirmation Sampling Analytical Results
- Disposal Facility Name(s) and Permit Number(s)
- Application Rate & Seeding techniques
- Photo Documentation of Reclamation

**Williams Production Co., LLC**  
**San Juan Basin: New Mexico Assets**  
**Production Pit: Below-Grade Tank**  
**Closure Plan**

In accordance with Rule 19.15.17.13 NMAC, the following plan describes the general closure requirements of below-grade tanks (BGT) on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico. This is WPX's standard procedure for all out-of-service BGTs used to store produced liquids during production operations at gas wells operated by WPX.

For those closures which do not conform to this standard closure plan, a separate well/pit specific closure plan will be developed and utilized. All closure activities will include proper documentation and will be submitted to OCD within 60 days of the pit closure on a Closure Report using Division Form C-144. The Report will include the following:

- Plot Plan (Pit Diagram)
- Available Inspection reports
- Sampling Results
- Waste disposal documentation

**General Plan Requirements:**

1. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank ...). The well will be temporarily shut in until the rerouting is completed.
2. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed of by injection at one of the Williams Production Rosa Unit Salt Water Disposal wells: Rosa SWD #1 (API: 30-039-27055) I-23-31N-06W Permit - SWD-916 or Rosa Unit #94 (API: 30-039-23035) K-16-31N-05W, Permit - SWD-758.
3. Notice of Closure will be given to the landowner or SMA, and the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)
4. The BGT and all associated materials will be removed, and recycled, reused, or disposed of in a Division-approved facility. All materials that can not be recycled or reused will be treated a solid waste and will be disposed of at a licensed disposal facility (probably San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426).
5. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(B)(1)(b) NMAC. In the event that the criteria are not met (See Table 1), a release will be reported following Rule 116 and impacted soils will be excavated and hauled to Envirotech Landfarm near Bloomfield, NM (NMOCD Permit NM-01-0011). Approval to haul will be requested of the Aztec District office prior to initiation.

Table 1: Closure Criteria for BGTs

Components	Testing Methods	Closure Limits (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2
BTEX	EPA SW-846 Method 8021B or 8260B	50
TPH	EPA SW-846 Method 8015 M(Full Range)* or Method 418.1	100
Chlorides	EPA SW-846 Method 300.1	250

\* Preferred method

6. Upon completion of the tank removal and any necessary soil remediation, the excavation will be backfilled with non-waste earthen material compacted to native and covered with a minimum of one foot of top soil. The surface will be re-contoured to match the native grade.
7. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. *Note: WPX assumes the seeding stipulations including mix and seeding methods specified by the Surface Management Agency (BLM, BOR, USFS, Tribal, etc.) or Land owner as part of a surface use agreement or APD are Division-approved methods unless notified by the Division of their unacceptability.*
8. For those portions of the former pit area required for production activities, re-seeding will be done at well abandonment, and following the procedure noted above.



**Williams Production Co., LLC**  
**San Juan Basin: New Mexico Assets**  
Below-Grade Tank Removal  
Closure Plan

In accordance with Rule 19.15.17.13 NMAC, the following plan describes the general closure requirements of below-grade tanks (BGT) on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico. This is WPX's standard closure procedure for all BGTs regulated under Rule 19.15.17 NMAC and operated by WPX. For those closures which do not conform to this standard closure plan, a separate well/pit specific closure plan will be developed and utilized.

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- The integrity of the BGT fails. Notification will be within 48 hours to the Division and closure will be schedule as specified in 19.15.17.12 (A)(5) NMAC.
- WPX chooses to take the BGT out-of-service due to operational needs. Closure under these conditions will be closed within 60 days of cessation of the BGT's operation.
- BGTs installed prior to June 16, 2008 that do not meet the requirements under 19.15.17.11.1(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

**General Plan Requirements:**

1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current surface owner of record. The surface owner of record will be notified of the intent to closure the BGT by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner of record will be notified as soon as practical.
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  - a. Operators Name (WPX)
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3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shutin until the rerouting is completed.
4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).
5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).
6. WPX will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as

solid waste. Fiberglass tanks and liner materials will meet the conditions of paragraph 1 subsection D of 19.15.9.712 NMAC. Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426.

7. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from the location.
8. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(E) (4) NMAC as identified in Table 1. Grab samples will be collected from any area that is wet, discolored or showing other evidence of a release. Results will be report to the Division following receipt from the lab on Form C-141.

Table 1: Closure Criteria for BGTs

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BTEX	EPA SW-846 Method 8021B or 8260B	50
TPH	EPA SW-846 Method 418.1 <sup>(1)</sup>	100
Chlorides	EPA SW-846 Method 300.1 <sup>(1)</sup>	250 <sup>(2)</sup>

<sup>(1)</sup> Method modified for solid waste.

<sup>(2)</sup> If background concentration of Chlorides greater than 250 mg/Kg, then higher concentration will be used for closure.

9. If the Division and/or WPX determine there is a release, WPX will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.
10. Upon completion of the tank removal, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot of top soil or background thickness whichever is greater and to existing grade. The surface will be recontoured to match the native grade and prevent ponding.
11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. *Note: If a surface owner agreement requires reseeding or other surface restoration that do not meet the revegetation requirements of 19.15.17.13.1 NMAC then WPX will submit the proposed alternative with written documentation that the surface owner agrees to the alternative, for Division approval.*
12. For those portions of the former pit area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

#### Closure Report:

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- Proof of Closure Notice (surface owner & NMOCD)
- Backfilling & Cover Installation
- Site Diagram with coordinates
- Available Inspection reports
- Confirmation Sampling Analytical Results
- Disposal Facility Name(s) and Permit Number(s)
- Application Rate & Seeding techniques
- Photo Documentation of Reclamation

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:19 AM

Inspection ID: 1032

Page 1 of 1

## **A. General Information**

*Date Inspected:*

7/2/2012 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

0

*Comments/Repairs Needed:*

not in use

## **C. Validation**

*Ecocion Review*

Y

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:24 AM

Inspection ID: 10112

Page 1 of 1

## **A. General Information**

*Date Inspected:*

3/5/2013 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

50

*Comments/Repairs Needed:*

Top of ice top of pit

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:24 AM

Inspection ID: 9253

Page 1 of 1

## **A. General Information**

*Date Inspected:*

2/7/2013 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

50

*Comments/Repairs Needed:*

Top of ice to top of pit

# San Juan Preventative Maintenance - Produced Water Tank

Report Date: Friday, June 7, 2013 11:23 AM

Inspection ID: 8435

Page 1 of 1

## **A. General Information for the Produced Water Tank**

*Inspected Equipment:*

53752 (Serial Number: BET-1930)

*Date of Inspection:*

2/4/2013 12:00 AM

*Inspection Completed By:*

Gary Hayes

*Workorder Required?*

Yes

*Responsible Person (if workorder required):*

Tommy Darrell

## **C. Comments**

*Comments*

Open top pit remove from PM list

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:23 AM

Inspection ID: 8135

Page 1 of 1

## **A. General Information**

*Date Inspected:*

1/25/2013 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

53

*Comments/Repairs Needed:*

top of ice to top of pit

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:22 AM

Inspection ID: 6956

Page 1 of 1

## **A. General Information**

*Date Inspected:*

12/3/2012 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

3



# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:22 AM

Inspection ID: 6492

Page 1 of 1

## **A. General Information**

*Date Inspected:*

11/1/2012 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

18

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:22 AM

Inspection ID: 5463

Page 1 of 1

## **A. General Information**

*Date Inspected:*

10/6/2012 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

17.5

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:21 AM

Inspection ID: 5463

Page 1 of 1

## **A. General Information**

*Date Inspected:*

10/6/2012 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

17.5

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:21 AM

Inspection ID: 2831

Page 1 of 1

## **A. General Information**

*Date Inspected:*

9/6/2012 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

*Leak Detection Level (in):*

0

*Pit Level (in):*

17

# Below Grade Tanks Inspection

Report Date: Friday, June 7, 2013 11:20 AM

Inspection ID: 2155

Page 1 of 1

## **A. General Information**

*Date Inspected:*

8/6/2012 12:00 AM

*Tank:*

53752 (Serial Number: BET-1930)

*Technician:*

Gary Hayes

*Workorder Required?:*

No

## **B. Inspection Information**

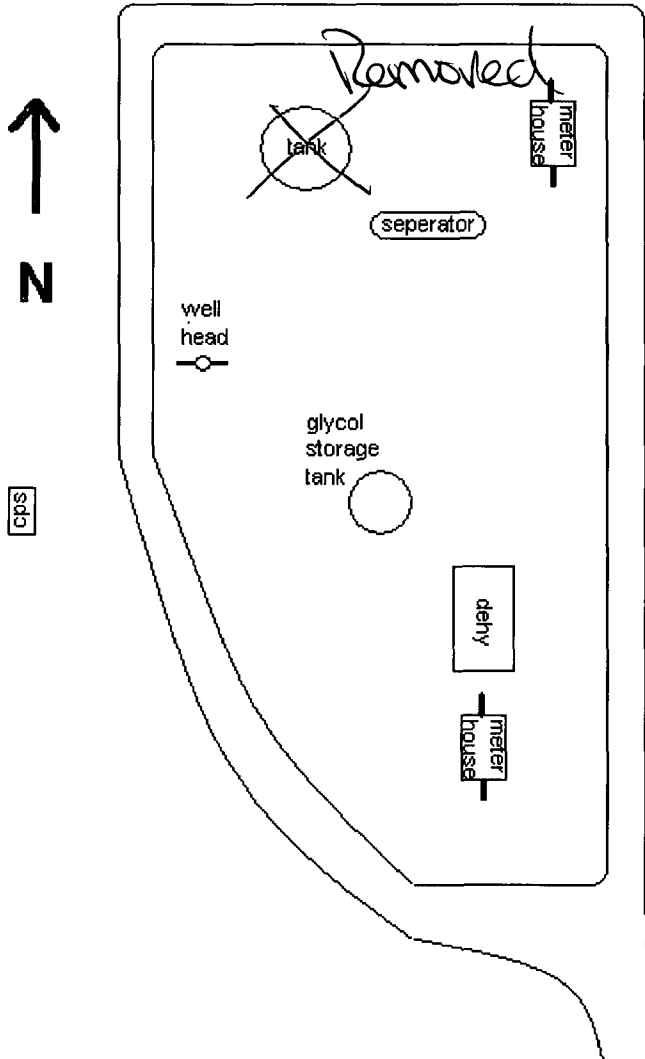
*Leak Detection Level (in):*

0

*Pit Level (in):*

30

ROSA UNIT #88 MV8561501  
ROSA UNIT #88 PC 8564901





## Analytical Report

### Report Summary

Client: WPX Energy, Inc.  
Chain Of Custody Number: 12226  
Samples Received: 3/19/2013 2:57:00PM  
Job Number: 04108-0137  
Work Order: P303065  
Project Name/Location: Rosa Unit #088

Entire Report Reviewed By:

A handwritten signature in black ink, appearing to read 'Tim Cain', written over a horizontal line.

Date: 3/26/13

Tim Cain, Laboratory Manager

The results in this report apply to the samples submitted to Envirotech's Analytical Laboratory and were analyzed in accordance with the chain of custody document supplied by you, the client, and as such are for your exclusive use only. The results in this report are based on the sample as received unless otherwise noted. Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech, Inc. If you have any questions regarding this analytical report, please don't hesitate to contact Envirotech's Laboratory Staff.



WPX Energy, Inc.  
PO Box 21218  
Tulsa OK, 74121-1358

Project Name: Rosa Unit #088  
Project Number: 04108-0137  
Project Manager: WPX Energy

**Reported:**  
26-Mar-13 14:46

### Analytical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Rosa UT # 88 Sample 1	P303065-01A	Soil	03/14/13	03/19/13	Glass Jar, 4 oz.
Rosa UT # 88 Sample 2	P303065-02A	Soil	03/14/13	03/19/13	Glass Jar, 4 oz.

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WPX Energy, Inc.  
PO Box 21218  
Tulsa OK, 74121-1358

Project Name: Rosa Unit #088  
Project Number: 04108-0137  
Project Manager: WPX Energy

Reported:  
26-Mar-13 14:46

**Rosa UT # 88 Sample 1**  
**P303065-01 (Solid)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
<b>Volatile Organics by EPA 8021</b>									
Benzene	ND	50.2	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Toluene	ND	50.2	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Ethylbenzene	ND	50.2	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
p,m-Xylene	ND	50.2	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
o-Xylene	ND	50.2	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Total BTEX	ND	50.2	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Surrogate: Bromochlorobenzene		91.2 %	80-120		1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Surrogate: 1,4-Difluorobenzene		94.5 %	80-120		1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Surrogate: Fluorobenzene		93.3 %	80-120		1312021	20-Mar-13	21-Mar-13	EPA 8021B	
<b>Nonhalogenated Organics by 8015</b>									
Gasoline Range Organics (C6-C10)	ND	5.0	mg/kg	1	1312022	20-Mar-13	21-Mar-13	EPA 8015D	
Diesel Range Organics (C10-C28)	ND	5.0	mg/kg	1	1312022	20-Mar-13	21-Mar-13	EPA 8015D	
GRO and DRO Combined Fractions	ND	5.0	mg/kg	1	1312022	20-Mar-13	21-Mar-13	EPA 8015D	
<b>Polycyclic Aromatic Hydrocarbons by 8270</b>									
Naphthalene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Acenaphthylene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Acenaphthene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Fluorene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Phenanthrene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Anthracene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Fluoranthene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Pyrene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[a]anthracene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Chrysene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[b]fluoranthene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[k]fluoranthene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[a]pyrene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Indeno(1,2,3-cd)pyrene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Dibenzo(a,h)anthracene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[ghi]perylene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Surrogate: 2-Fluorobiphenyl		29.2 %	20-120		1313006	25-Mar-13	26-Mar-13	EPA 8270D	

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WPX Energy, Inc. PO Box 21218 Tulsa OK, 74121-1358	Project Name: Rosa Unit #088 Project Number: 04108-0137 Project Manager: WPX Energy	Reported: 26-Mar-13 14:46
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**Rosa UT # 88 Sample 1**  
**P303065-01 (Solid)**

Analyte	Result	Reporting		Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit								
Cation/Anion Analysis										
Chloride	ND	1.00	mg/kg	1	1312025	21-Mar-13	21-Mar-13	EPA 300.0		

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**Rosa UT # 88 Sample 2**  
**P303065-02 (Solid)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
<b>Volatile Organics by EPA 8021</b>									
Benzene	ND	49.9	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Toluene	ND	49.9	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Ethylbenzene	ND	49.9	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
p,m-Xylene	ND	49.9	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
o-Xylene	ND	49.9	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Total BTEX	ND	49.9	ug/L	1	1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Surrogate: Bromochlorobenzene		90.6 %	80-120		1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Surrogate: 1,4-Difluorobenzene		93.7 %	80-120		1312021	20-Mar-13	21-Mar-13	EPA 8021B	
Surrogate: Fluorobenzene		93.4 %	80-120		1312021	20-Mar-13	21-Mar-13	EPA 8021B	
<b>Nonhalogenated Organics by 8015</b>									
Gasoline Range Organics (C6-C10)	ND	5.0	mg/kg	1	1312022	20-Mar-13	21-Mar-13	EPA 8015D	
Diesel Range Organics (C10-C28)	ND	5.0	mg/kg	1	1312022	20-Mar-13	21-Mar-13	EPA 8015D	
GRO and DRO Combined Fractions	ND	5.0	mg/kg	1	1312022	20-Mar-13	21-Mar-13	EPA 8015D	
<b>Polyaromatic Aromatic Hydrocarbons by 8270</b>									
Naphthalene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Acenaphthylene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Acenaphthene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Fluorene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Phenanthrene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Anthracene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Fluoranthene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Pyrene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[a]anthracene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Chrysene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[b]fluoranthene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[k]fluoranthene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[a]pyrene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Indeno(1,2,3-cd)pyrene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Dibenzo(a,h)anthracene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Benzo[ghi]perylene	ND	0.01	mg/kg	1	1313006	25-Mar-13	26-Mar-13	EPA 8270D	
Surrogate: 2-Fluorobiphenyl		26.6 %	20-120		1313006	25-Mar-13	26-Mar-13	EPA 8270D	

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WPX Energy, Inc.	Project Name:	Rosa Unit #088	
PO Box 21218	Project Number:	04108-0137	<b>Reported:</b>
Tulsa OK, 74121-1358	Project Manager:	WPX Energy	26-Mar-13 14:46

**Rosa UT # 88 Sample 2**  
**P303065-02 (Solid)**

Analyte	Result	Reporting		Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit								
Cation/Anion Analysis										
Chloride	25.4	1.00	mg/kg	1	1312025	21-Mar-13	21-Mar-13	EPA 300.0		

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WPX Energy, Inc.	Project Name:	Rosa Unit #088	Reported: 26-Mar-13 14:46
PO Box 21218	Project Number:	04108-0137	
Tulsa OK, 74121-1358	Project Manager:	WPX Energy	

### Volatile Organics by EPA 8021 - Quality Control

#### Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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#### Batch 1312021 - Purge and Trap EPA 5030A

##### Blank (1312021-BLK1)

Prepared: 20-Mar-13 Analyzed: 21-Mar-13

Benzene	ND	0.99	ug/L							
Toluene	ND	0.99	"							
Ethylbenzene	ND	0.99	"							
p,m-Xylene	ND	0.99	"							
o-Xylene	ND	0.99	"							
Total BTEX	ND	0.99	"							
Surrogate: Bromochlorobenzene	45.0		"	50.0		89.9	80-120			
Surrogate: 1,4-Difluorobenzene	45.2		"	50.0		90.4	80-120			
Surrogate: Fluorobenzene	45.6		"	50.0		91.3	80-120			

##### Duplicate (1312021-DUP1)

Source: P303066-01

Prepared: 20-Mar-13 Analyzed: 21-Mar-13

Benzene	ND	497	ug/L		ND				30	
Toluene	1410	497	"		1460			3.58	30	
Ethylbenzene	662	497	"		682			2.95	30	
p,m-Xylene	6570	497	"		6670			1.61	30	
o-Xylene	2540	497	"		2580			1.64	30	
Surrogate: Bromochlorobenzene	49.2		"	50.0		98.5	80-120			
Surrogate: 1,4-Difluorobenzene	45.8		"	50.0		91.6	80-120			
Surrogate: Fluorobenzene	45.6		"	50.0		91.2	80-120			

##### Matrix Spike (1312021-MS1)

Source: P303066-01

Prepared: 20-Mar-13 Analyzed: 21-Mar-13

Benzene	51.8		ug/L	50.0	0.33	103	39-150			
Toluene	54.2		"	50.0	2.92	103	46-148			
Ethylbenzene	52.7		"	50.0	1.36	103	32-160			
p,m-Xylene	114		"	100	13.3	101	46-148			
o-Xylene	54.8		"	50.0	5.16	99.3	46-148			
Surrogate: Bromochlorobenzene	50.5		"	50.0		101	80-120			
Surrogate: 1,4-Difluorobenzene	50.6		"	50.0		101	80-120			
Surrogate: Fluorobenzene	50.7		"	50.0		101	80-120			

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WPX Energy, Inc.	Project Name:	Rosa Unit #088	Reported: • 26-Mar-13 14:46
PO Box 21218	Project Number:	04108-0137	
Tulsa OK, 74121-1358	Project Manager:	WPX Energy	

### Nonhalogenated Organics by 8015 - Quality Control

#### Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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#### Batch 1312022 - GRO/DRO Extraction EPA 3550C

##### Blank (1312022-BLK1)

Prepared: 20-Mar-13 Analyzed: 21-Mar-13

Gasoline Range Organics (C6-C10)	ND	5.0	mg/kg
Diesel Range Organics (C10-C28)	ND	5.0	"
GRO and DRO Combined Fractions	ND	5.0	"

##### Duplicate (1312022-DUP1)

Source: P303066-01

Prepared: 20-Mar-13 Analyzed: 21-Mar-13

Gasoline Range Organics (C6-C10)	67.3	5.0	mg/kg	67.6	0.464	30
Diesel Range Organics (C10-C28)	90.2	5.0	"	94.9	5.04	30

##### Matrix Spike (1312022-MS1)

Source: P303066-01

Prepared: 20-Mar-13 Analyzed: 21-Mar-13

Gasoline Range Organics (C6-C10)	291	5.0	mg/kg	250	67.6	89.2	75-125
Diesel Range Organics (C10-C28)	291	5.0	"	250	94.9	78.4	75-125

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WPX Energy, Inc. PO Box 21218 Tulsa OK, 74121-1358	Project Name: Rosa Unit #088 Project Number: 04108-0137 Project Manager: WPX Energy	Reported: 26-Mar-13 14:46
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**Polyaromatic Aromatic Hydrocarbons by 8270 - Quality Control**

**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 1313006 - Ultrasonic Bath Extraction EPA 3550C**

**Blank (1313006-BLK1)**

Prepared: 25-Mar-13 Analyzed: 26-Mar-13

Naphthalene	ND	0.01	mg/kg							
Acenaphthylene	ND	0.01	"							
Acenaphthene	ND	0.01	"							
Fluorene	ND	0.01	"							
Phenanthrene	ND	0.01	"							
Anthracene	ND	0.01	"							
Fluoranthene	ND	0.01	"							
Pyrene	ND	0.01	"							
Benzo[a]anthracene	ND	0.01	"							
Chrysene	ND	0.01	"							
Benzo[b]fluoranthene	ND	0.01	"							
Benzo[k]fluoranthene	ND	0.01	"							
Benzo[a]pyrene	ND	0.01	"							
Indeno(1,2,3-cd)pyrene	ND	0.01	"							
Dibenzo(a,h)anthracene	ND	0.01	"							
Benzo[ghi]perylene	ND	0.01	"							

Surrogate: 2-Fluorobiphenyl 1.40 " 5.00 27.9 20-120

**Duplicate (1313006-DUP1)**

Source: P303065-01

Prepared: 25-Mar-13 Analyzed: 26-Mar-13

Naphthalene	ND	0.01	mg/kg		ND				30	
Acenaphthylene	ND	0.01	"		ND				30	
Acenaphthene	ND	0.01	"		ND				30	
Fluorene	ND	0.01	"		ND				30	
Phenanthrene	ND	0.01	"		ND				30	
Anthracene	ND	0.01	"		ND				30	
Fluoranthene	ND	0.01	"		ND				30	
Pyrene	ND	0.01	"		ND				30	
Benzo[a]anthracene	ND	0.01	"		ND				30	
Chrysene	ND	0.01	"		ND				30	
Benzo[b]fluoranthene	ND	0.01	"		ND				30	
Benzo[k]fluoranthene	ND	0.01	"		ND				30	
Benzo[a]pyrene	ND	0.01	"		ND				30	
Indeno(1,2,3-cd)pyrene	ND	0.01	"		ND				30	
Dibenzo(a,h)anthracene	ND	0.01	"		ND				30	
Benzo[ghi]perylene	ND	0.01	"		ND				30	

Surrogate: 2-Fluorobiphenyl 1.61 " 5.00 32.2 20-120

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Three Springs - 65 Mercado Street, Suite 115, Durango, CO 81301

Ph (970) 259-0615 Fr (800) 362-1879

envirotech-inc.com

laboratory@envirotech-inc.com



WPX Energy, Inc.  
PO Box 21218  
Tulsa OK, 74121-1358

Project Name: Rosa Unit #088  
Project Number: 04108-0137  
Project Manager: WPX Energy

**Reported:**  
26-Mar-13 14:46

#### Notes and Definitions

SPK1 The spike recovery for this QC sample is outside of control limits.

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

RPD Relative Percent Difference

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WPX Energy, Inc.	Project Name:	Rosa Unit #088	Reported: 26-Mar-13 14:46
PO Box 21218	Project Number:	04108-0137	
Tulsa OK, 74121-1358	Project Manager:	WPX Energy	

**Polyaromatic Aromatic Hydrocarbons by 8270 - Quality Control**

**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 1313006 - Ultrasonic Bath Extraction EPA 3550C**

Matrix Spike (1313006-MS1)	Source: P303065-01			Prepared: 25-Mar-13		Analyzed: 26-Mar-13				
Naphthalene	1.96	0.01	mg/kg	5.00	ND	39.3	10-122			
Acenaphthylene	2.27	0.01	"	5.00	ND	45.4	10-139			
Acenaphthene	1.93	0.01	"	5.00	ND	38.6	10-124			
Fluorene	1.81	0.01	"	5.00	ND	36.3	10-142			
Phenanthrene	2.12	0.01	"	5.00	ND	42.4	10-155			
Anthracene	1.89	0.01	"	5.00	ND	37.9	10-126			
Fluoranthene	2.32	0.01	"	5.00	ND	46.5	14-123			
Pyrene	2.19	0.01	"	5.00	ND	43.8	10-140			
Benzo[a]anthracene	1.95	0.01	"	5.00	ND	39.0	10-116			
Chrysene	2.06	0.01	"	5.00	ND	41.2	12-135			
Benzo[b]fluoranthene	3.13	0.01	"	5.00	ND	62.7	10-199			
Benzo[k]fluoranthene	1.54	0.01	"	5.00	ND	30.9	10-150			
Benzo[a]pyrene	3.37	0.01	"	5.00	ND	67.4	10-159			
Indeno(1,2,3-cd)pyrene	8.91	0.01	"	5.00	ND	178	10-128			SPK1
Dibenzo(a,h)anthracene	6.60	0.01	"	5.00	ND	132	10-110			SPK1
Benzo[ghi]perylene	12.6	0.01	"	5.00	ND	251	10-116			SPK1
Surrogate: 2-Fluorobiphenyl	1.74		"	5.00		34.8	20-120			

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WPX Energy, Inc.	Project Name:	Rosa Unit #088	Reported: 26-Mar-13 14:46
PO Box 21218	Project Number:	04108-0137	
Tulsa OK, 74121-1358	Project Manager:	WPX Energy	

**Cation/Anion Analysis - Quality Control**

**Envirotech Analytical Laboratory**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 1312025 - Anion Extraction EPA 300.0**

**Blank (1312025-BLK1)**

Prepared & Analyzed: 21-Mar-13

Chloride	ND	1.00	mg/kg							
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**Duplicate (1312025-DUP1)**

Source: P303061-01

Prepared & Analyzed: 21-Mar-13

Chloride	118	1.00	mg/kg		120			1.92	30	
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# CHAIN OF CUSTODY RECORD

12226

Page 13 of 13

Client: <b>WPX Energy</b>		Project Name / Location: <b>Rosa Unit #088</b>				ANALYSIS / PARAMETERS															
Client Address: <b>721 S. Main St.</b>		Sampler Name: <b>Darrell Bays</b>																			
Client Phone No.: <b>505-333-1880</b>		Client No.: <b>04108-0137</b>																			
Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative H <sub>2</sub> O <sub>2</sub> HCl		TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE			Sample Cool	Sample Intact
<b>Rosa UT #88 Sample 1</b>	<b>3/14/13</b>	<b>1:40</b>	<b>P303045-01</b>	Soil Sludge Aqueous	<b>402</b>			<b>X</b>	<b>X</b>						<b>X</b>		<b>X</b>			<b>✓</b>	<b>✓</b>
<b>Rosa UT #88 Sample 2</b>	<b>3/14/13</b>	<b>1:40</b>	<b>P303045-02</b>	Soil Sludge Aqueous	<b>402</b>			<b>X</b>	<b>X</b>						<b>X</b>		<b>X</b>			<b>✓</b>	<b>✓</b>
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
Relinquished by: (Signature) <b>[Signature]</b>		Date <b>3/19</b>	Time <b>2:45</b>	Received by: (Signature) <b>[Signature]</b>		Date <b>3/19/13</b>		Time <b>245</b>													
Relinquished by: (Signature)				Received by: (Signature)																	
Relinquished by: (Signature)				Received by: (Signature)																	



**envirotech**  
Analytical Laboratory

5796 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • lab@envirotech-inc.com



WPX Energy  
Production, LLC

**ROSA UNIT #088 MV PC  
NMSF-078765**

**API NO. 30-045-25140**

**1610' FNL & 1100' FWL**

**SEC.8 T31N R06W NMPM**

**SAN JUAN COUNTY, NM**

**LAT: 36.91670 LONG: 107.49150**

**•EMERGENCY CONTACT # 1-888-615-4561•**





721. South Main Street  
Aztec, NM 87410

June 26, 2013

Jonathan Kelly  
New Mexico Oil Conservation Division  
1000 Rio Brazos Road  
Aztec, NM 87410

RCVD JUN 26 '13  
OIL CONS. DIV.  
DIST. 3

Dear Mr. Kelly

REF: OCD Permit # 11271

Please find attached the requested revised C-144 Below Grade Closure Report for the Rosa Unit # 088 API: 30-04525140 .

Please let me know if you need any further information regarding this closure.

Thank you,

A handwritten signature in black ink, appearing to read "Vanessa Fields", with a long horizontal flourish extending to the right.

Vanessa Fields  
EH&S Coordinator

**WPX ENERGY Production Co., LLC**  
**San Juan Basin: New Mexico Assets**  
Below-Grade Tank Removal  
Closure Report

**Well:** (Rosa Unit #088)  
**API No:** 3004525140  
**Location:** E S08 T31N R06W

In accordance with Rule 19.15.17.13 NMAC, the following report describes the general closure of the referenced below-grade tanks (BGT) on WPX ENERGY Production Co, LLC (WPX) location in the San Juan Basin of New Mexico. The closure follows this WPX's standard closure procedure for all BGTs regulated under Rule 19.15.17 NMAC and operated by WPX. For those closures which do not conform to the standard closure plan, a separate well/pit specific closure plan will be developed and utilized.

**Closure Conditions and Timing:**

Pursuant to 19.15.17.13 (A) NMAC, WPX will initiate closure of any BGT should any one of these conditions occur:

- The Division requires closure because of imminent danger to fresh water, public health or the environment.
- The integrity of the BGT fails. Notification will be within 48 hours to the Division and closure will be schedule as specified in 19.15.17.12 (A)(5) NMAC.
- WPX chooses to take the BGT out-of-service due to operational needs. Closure under these conditions will be initiated within 60 days of cessation of the BGT's operation.
- BGTs installed prior to June 16, 2008 that do not meet the requirements under 19.15.17.11.1(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

**General Plan Requirements:**

1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current landowner of record. The landowner of record will be notified of the intent to closure the BGT by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the landowner of record will be notified as soon as practical.

Williams notified the SMA of its intent to clean close the BGT via Certified Mail on March 10, 2009 see attached. No return receipt required per BLM:FFO/NMOCD MOU dated 5/4/09.

2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)

Aztec District office was notified of WPX's E&P intent to close on (March, 15, 2013).

3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank ...). The well will be temporarily shutin until the rerouting is completed.
4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle

Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).

Produced water in the BGT prior to closures was removed by vacuum truck and hauled to the Rosa Unit disposal wells listed.

5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).

No solids or sludge required removal prior to excavation and removal of the tank.

6. WPX ENERGY will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as solid waste. Tanks and liner materials will meet the conditions of paragraph 1 subsection D or 19.15.9.712 NMAC. Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426.

7. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from the location.

Tank and plastic liner were removed offsite. All other piping and equipment also removed for collocated well. See attached photo.

8. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(E)(4) NMAC as identified in Table 1. Grab samples will be collected from any area that is wet, discolored or showing other evidence of a release. Results will be report to the Division following receipt from the lab on Form C-141.

Table 1: Closure Criteria for BGTs

Components	Testing Methods	Closure Limits (mg/Kg)	Sample Results (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2	ND
BTEX	EPA SW-846 Method 8021B or 8260B	50	ND
TPH	EPA SW-846 Method 418.1 <sup>(1)</sup>	100	ND
Chlorides	EPA SW-846 Method 300.1 <sup>(1)</sup>	250 <sup>(2)</sup>	25.4

<sup>(1)</sup> Method modified for solid waste.

<sup>(2)</sup> If background concentration of Chlorides greater than 250 mg/Kg, then higher concentration will be used for closure.

9. If the Division and/or WPX ENERGY determine there is a release, WPX ENERGY will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.

Release Detected see C-141 in compliance with 15.3.116 NMAC and 19.15.1.19 NMAC

10. Upon completion of the tank removal, and any necessary soil remediation, the excavation will be backfilled with non-waste earthen material compacted to native and covered with a minimum of one foot of top soil or background thickness. The surface will be recontoured to match the native grade.

Pit area backfilled with clean earthen material following sample results. No contaminated soil taken off site. Backfill compacted to avoid settling and pit area remains in use for production operations.

11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat



seeding or planting will be continued until successful vegetative growth occurs.  
*Note: WPX assumes the seeding stipulations including mix and seeding methods specified by the Surface Management Agency (BLM, BOR, USFS, Tribal, etc.) APD are Division-approved methods unless notified by the Division of their unacceptability. If a landowner agreement requires reseeding or other surface restoration that does not meet the revegetation requirements of 19.15.17.13, then WPX will submit the proposed alternative with written documentation that the landowner agrees to the alternative, for Division approval.*

Pit area along with unused portions of well pad interim reclaimed and following P&A entire location to be reclaimed and recontoured in accordance with Surface Management Agency requirements in APD-COAs and per BLM:FFO/NMOCD MOU dated 5/4/09.

12. For those portions of the former pit area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

See above notes.

#### **Closure Report:**

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using Division Form C-144. The Report will include the following:

- |   |   |
|---|---|
| • Proof of Closure Notice (surface owner & NMOCD) | • Confirmation Sampling Analytical Results            |
| • Backfilling & Cover Installation                | • Disposal Facility Name(s) and Permit Number(s)      |
| • Site Diagram with coordinates                   | • Re-vegetation Application Rate & Seeding techniques |
| • Available Inspection reports                    | • Photo Documentation of Reclamation                  |