District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505 State of New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office. For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

<u>Pit, Below-Grade Tank, or</u> Proposed Alternative Method Permit or Closure Plan Application
Type of action: Below grade tank registration Permit of a pit or proposed alternative method Closure of a pit, below-grade tank, or proposed alternative method Modification to an existing permit/or registration Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, 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.
I. Operator: WPX Energy Production, LLC OGRID #: 120782 Address: PO Box 640/721 S Main Aztec, NM 87410 Facility or well name: Rosa Unit #019 API Number: 30-039-07955 OCD Permit Number: U/L or Qtr/Qtr K Section 24 Township 31N Range 6W County: Rio Arriba Center of Proposed Design: Latitude N36.88223 Longitude W107.417590 NAD83 DIST. 3 Surface Owner: Federal State Private Private Tribal Trust or Indian Allotment DIL CONS. DIV DIST. 3
2. Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: Drilling Workover JAN 0 4 2018 Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid Lined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other
3.
 Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
 5. 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

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)

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 19.15.16.8 NMAC

Variances and Exceptions:

7

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:

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

9. 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. Siting criteria does not apply to drying pads or above-grade tanks.		
General siting		
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	□ Yes □ No □ NA	
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA	
 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. (Does not apply to below grade tanks) Written confirmation or verification from the municipality; Written approval obtained from the municipality 	Yes No	
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	Yes 🗌 No	
 Within an unstable area. (Does not apply to below grade tanks) Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	🗋 Yes 🗌 No	
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	Yes No	
Below Grade Tanks		
 Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). Topographic map; Visual inspection (certification) of the proposed site 	🗋 Yes 🗌 No	
 Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No	
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)		
 Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) Topographic map; Visual inspection (certification) of the proposed site 	Yes 🗋 No	
Within 300 feet from a occupied 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 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	🗋 Yes 🗌 No	

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	Yes No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any 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 spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
 Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	🗌 Yes 🗌 No
Permanent Pit or Multi-Well Fluid Management Pit	
 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 1000 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 spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	🗌 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
10. Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the dot 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 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	NMAC 15.17.9 NMAC
II. Multi Wall Fluid Management Bit Charlington Subsection D of 10.15.17.0 NMAC	
Multi-Well Fluid Management Pit 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 dot attached. 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 A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC	
Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC	
Previously Approved Design (attach copy of design) API Number: or Permit Number:	

- Written confirmation or verification from the municipality; Written approval obtained from the municipality	Yes No	
 Within the area overlying a subsurface mine. Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division 		
 Within an unstable area. Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	🗌 Yes 🗌 No	
Within a 100-year floodplain.	Yes No	
- FEMA map		
16. 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.		
17. 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 beli	ief.	
Name (Print):		
Signature: Date:		
e-mail address: Telephone:		
e-mail address: Telephone: <u>OCD Approva</u> l: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: Title: OCD Permit Number:		
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature:		
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature:	12018 the closure report.	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature:	the closure report.	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment) OCD Representative Signature: Approval Date: Approval Date: Approval Date: Title: OCD Permit Number: OCD Permit Number: 19. Closure Report (required within 60 days of closure completion): 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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.	the closure report.	

Oil Conservation Division

 ^{12.} <u>Permanent Pits Permit Application Checklist</u>: 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 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 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 19.15.17.11 NMAC Huisance or Hazardous Odors, including H₂S, 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 19.15.17.9 NMAC and 19.15.17.13 NMAC 	documents are
13. Proposed Closure: 10 15 17 13 NMAC	
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 Multi-well F 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 Onesite Trench Burial Onesite Trench Burial	luid Management Pit
14.	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be a 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 C 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 H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15.	
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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. F 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 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 25-50 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 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 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, 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 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, 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
Written confirmation or verification from the municipality; Written approval obtained from the municipality	Yes No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; 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	
Form C-144 Oil Conservation Division Page 4 o	f 6

22. **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): <u>Deborah Watson</u>

Signature:

Title: Environmental Specialist

Debrah Water

Date: January 3, 2018

WPX Energy Production Co., LLC San Juan Basin: New Mexico Assets Below-Grade Tank Removal Closure Report Rosa Unit #019 (API #30-039-07955) Unit Letter K, Section 24, T31N, R06W Rio Arriba County, NM

In accordance with Rule 19.15.17.13 NMAC, the following plan describes the general closure requirements of below-grade tanks (BGT) on WPX Energy 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.

Mr. Randolph Bayliss, NMOCD, approved the WPX BGT closure plan on November 15, 2017. (See Enclosed Form C-144)

Closure Notice:

1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hours or 1 week before closure 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.

Approved Variance: If the surface owner is of public entity (i.e.: BLM) WPX Energy Production, LLC will notify by email the intent to close the BGT in place of a certified mail letter. WPX Energy Production, LLC will request a read receipt of the email which will be equal and/ or equivalent notification as certified mail.

WPX notified NM Department of Game and Fish, prior to BGT closure. The notification email is attached.

- 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)

WPX sent notification to the District III Office via email on November 15, 2017. The notification is attached. The District III Office was advised of time and date of closure. Mr. Cory Smith, NMOCD, was in attendance during BGT closure sampling on November 20, 2017.

Closure Method:

3. All liquids will be removed from the BGT following cessation of operation. Produced water will be disposed at an NMOCD approved facility depending on the proximity of the BGT site. Facilities may include: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit SWD #2 (Order: SWD-1236-0, API: 30-039-30812), 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). Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011) or Industrial Ecosystems Inc (Permit Number NM-01-0010B).

Liquids were removed prior to closure of the BGT.

4. 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 19.15.35 NMAC.

Below-Grade Tank Removal Plan/Closure Report WPX Energy Production, LLC

Disposal will be at a licensed disposal facility, such as San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426.

The BGT and liner were disposed of in a division-approved manner.

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

All associated equipment was removed from the location.

- 6. Following removal of the tank and any liner material, WPX will test the soils beneath the BGT as follows:
 - a. At a minimum, a five-point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination.
 - b.

A five-point composite sample (BGT-1) was collected from beneath the BGT following BGT removal on November 20, 2017. No obvious stained soils were observed beneath the BGT.

- c. The laboratory sample shall be analyzed for the constituents listed in Table 1.
- d.

The sample was submitted to Hall Environmental Analysis Laboratory, Albuquerque, NM, for analysis of benzene, BTEX, TPH, and chlorides. The analytical laboratory report is attached.

Components	Testing Methods ⁽¹⁾	Closure Limits ⁽²⁾	Results
	e	(mg/kg)	(mg/kg)
Benzene	EPA SW-846 Method 8021B or	0.2	<0.023
	8260B		
BTEX	EPA SW-846 Method 8021B or	50	<0.208
	8260B		
Total TPH	EPA SW-846 Method 418.1	100	<19
Chlorides	EPA 300.0	250	<30

 Table 1: Closure Criteria for BGTs

⁽¹⁾ Or other test methods approved by the division

⁽²⁾ Numerical limits or natural background level, whichever is greater (19.15.17.13 NMAC)

7. If the Division and/or WPX determine there is a release, WPX will comply with WPX will comply with 19.15.17.13.C.3b.

Sampling results indicate no release occurred from the BGT.

8. 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.

The BGT location was backfilled with clean soil and compacted during following BGT removal. The BGT location will be reclaimed when it is no longer needed for production operations.

9. For those portions of the former BGT area no longer required for production activities, WPX will seed the disturbed areas the first favorable growing season after the BGT is covered. Seeding will be accomplished

Below-Grade Tank Removal Plan/Closure Report WPX Energy Production, LLC

via drilling on the contour whenever practical, or by other Division-approved methods. WPX will notify the Division when reclamation and re-vegetation is complete.

Reclamation of the BGT shall be considered complete when:

- a. Vegetative cover reflects a life form ratio of +/- 50% of pre-disturbance levels
- b. Total percent plant cover of at least 70% of pre-disturbance levels
- (Excluding noxious weeds)

OR

c. Pursuant to 19.15.17.13.H.5d WPX will comply with obligations imposed by other applicable federal or tribal agencies in which their re-vegetation and reclamation requirements provide equal or better protection of fresh water, human health and the environment.

The BGT location was backfilled with clean soil and compacted during following BGT removal. The BGT location will be reclaimed when it is no longer needed for production operations.

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

The BGT location was backfilled with clean soil and compacted during following BGT removal. The BGT location will be reclaimed when it is no longer needed for production operations.

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. (**Operator Closure Certification has been completed**.) The Report will include the following:

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

Attachments:

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C-144 Closure Approval Surface Owner Notification (email) NMOCD Notification (email) Laboratory Analytical Report (#1711B11) Photograph log District] # 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

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		
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.		
Operator: WILLIAMS PRODUCTION COMPANY, LLC OGRID #: 120782		
Address: PO Box 640 Aztec, NM 87410		
Facility or well name: ROSA UNIT #019		
API Number: 3003907955 OCD Permit Number:		
Section 24K Township 31N Range 06W County RIO ARRIBA		
Latitude: <u>36.882129999999997</u> Longitude <u>107,41691</u> NAD: <u>1983</u> Surface Owner: <u>FEDERAL</u>		
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 ULDPE HDPE PVC Other		
String-Reinforced		
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D		
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: Thicknessmil 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: FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER		
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.		
Form C-144 WPX Closure Fix Oil Conservation Divisit Page 1 of 7		

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 institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet Alternate. Please specify	, hospital,
 7. <u>Netting</u>: 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) 	
 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. <u>Administrative Approvals and Exceptions:</u> Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. <i>Please check a box if one or more of the following is requested, if not leave blank:</i> X Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau consideration of approval. X Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. 	office for
10. <u>Siting Criteria (regarding permitting)</u> : 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accumaterial are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appr office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dry above-grade tanks associated with a closed-loop system.	opriate district approval.
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	🗌 Yes 🗌 No
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. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	I Yes I No NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☐ NA
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 search; 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	
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 & Mineral Resources; USGS; NM Geological Society; Topographic map 	🗋 Yes 🗋 No
Within a 100-year floodplain. - FEMA map	Yes No

11. <u>Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist</u> : Subsection B of 19.15.17.9 NMAC <i>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.</i> [] 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.
<u>Closed-loop Systems Permit Application Attachment Checklist</u> : 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. <u>Permanent Pits Permit Application Checklist</u> : 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 H₂S, 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. <u>Proposed Closure</u> : 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
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

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Waste Refnoval 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	.c	
17. <u>Siting Criteria (regarding on-site closure methods only)</u> : 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 Ø 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 & Mineral Resources; USGS; NM Geological Society; Topographic map 	🗌 Yes 🔀 No	
Within a 100-year floodplain. - FEMA map	🗌 Yes 🛛 No	
 18. <u>On-Site Closure Plan Checklist</u>: (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 19.15.17.13 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 I 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 		

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19. Operator Application Certification:		
I hereby certify that the information submitted with this application is true, accu	rate and complete to the best of my knowledge and belief.	
Name (Print):	Title: EH&S SPECIALIST	
Signature: Holly C. Lertins		
Signature:	Date: 2-12-2009	
e-mail address:holly.perkins@williams.com	Telephone: 505-634-4209	
20. <u>OCD Approval</u> : Permit Application (including closure plan) I Closure 1	Plan (only) OCD Conditions (see attachment)	
OCD Representative Signature:	Approval Date: 15Nov17	
Title: Hydrologist	OCD Permit Number: 18	
21. <u>Closure Report (required within 60 days of closure completion)</u> : Subsection Instructions: Operators are required to obtain an approved closure plan prior The closure report is required to be submitted to the division within 60 days of section of the form until an approved closure plan has been obtained and the c	to implementing any closure activities and submitting the closure report. the completion of the closure activities. Please do not complete this	
	Closure Completion Date:	
22. Closure Method: Waste Excavation and Removal On-Site Closure Method If different from approved plan, please explain.	ative Closure Method 🔲 Waste Removal (Closed-loop systems only)	
23. Closure Report Regarding Waste Removal Closure For Closed-loop System Instructions: Please indentify the facility or facilities for where the liquids, dri 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 o Yes (If yes, please demonstrate compliance to the items below) No	r in areas that will not be used for future service and operations?	
Required for impacted areas which will not be used for future service and operate Site Reclamation (Photo Documentation) Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique	tions:	
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 bax, 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		
23. Operator Closure Certification:		
I hereby certify that the information and attachments submitted with this closure belief. I also certify that the closure complies with all applicable closure requires		
Name (Print):	• •• •	
Signature:		
e-mail address:		
	· · · · · · · · · · · · · · · · · · ·	
Form C-144 WPX Closure in Oil Conservatio	n Divisit Page 5 of 7	

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:

> 16

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:

- 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.
- 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 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.

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(1)	100
Chlorides	EPA SW-846 Method 300.1(1)	250(2)

Table	1:	Closure	Criteria	for	BGTs
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⁽¹⁾ Method modified for solid waste.

⁽²⁾ 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 nonwaste 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.I 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

From:	Watson, Debbie
To:	"ryan.darr@state.nm.us"; "Smith, Cory, EMNRD"; Fields, Vanessa, EMNRD
Cc:	Bradshaw, Rob; Watson, Debbie
Subject:	BGT Closure Notification Rosa Unit #019
Date:	Wednesday, November 15, 2017 12:58:00 PM

WPX will be closing the BGT at the Rosa Unit #019 on Monday, November 20, 2017, see note below.

Operator: WPX Energy Production, LLC Well Name and API Number: Rosa Unit #019 (30-039-07955) Well Head Location: N36.8823853, W107.417511 BGT Location: N36.882129, W107.41691 Surface Owner: New Mexico Department of Game and Fish Location: Unit Letter K, Section 24, Township 31N, Range 6W, Rio Arriba County, NM BGT Removal and sampling: Monday, November 20, 2017

Note: WPX will be closing multiple BGTs on Monday, November 20, 2017. Sampling will begin at the Rosa Unit #166A at 9:00 AM. After sampling has been completed at the Rosa Unit #166A, sampling will continue in the following order: Rosa Unit #019B Rosa Unit #019 Rosa Unit #159A Rosa Unit #15

Please contact me with any questions.

Thank you,

Debbie

Deborah Watson Environmental Specialist PO Box 640 | Aztec, NM 87410 office 505.333.1880 | cell 505.386.9693 | fax 505.333.1805 deborah.watson@wpxenergy.com



If you have received this message in error, please reply to advise the sender of the error and then immediately delete this message. Thank you.

From:	Microsoft Outlook
To:	ryan.darr@state.nm.us; Smith, Cory, EMNRD; Fields, Vanessa, EMNRD
Subject:	Relayed: BGT Closure Notification Rosa Unit #019
Date:	Wednesday, November 15, 2017 12:59:11 PM
Attachments:	BGT Closure Notification Rosa Unit #019.msg

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server: ryan.darr@state.nm.us (ryan.darr@state.nm.us) <mailto:ryan.darr@state.nm.us> Smith, Cory, EMNRD (Cory.Smith@state.nm.us) <mailto:Cory.Smith@state.nm.us> Fields, Vanessa, EMNRD (Vanessa.Fields@state.nm.us) <mailto:Vanessa.Fields@state.nm.us> Subject: BGT Closure Notification Rosa Unit #019

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

December 01, 2017

Debbie Watson WPX Energy 721 S Main Ave Aztec, NM 87410 TEL: (505) 333-1880 FAX

OrderNo.: 1711B11

Dear Debbie Watson:

RE: Rosa Unit #019

Hall Environmental Analysis Laboratory received 1 sample(s) on 11/21/2017 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to <u>www.hallenvironmental.com</u> or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andia

Andy Freeman Laboratory Manager 4901 Hawkins NE Albuquerque, NM 87109

Analytical Report	
Lab Order 1711B11	

Date Reported: 12/1/2017

Hall Environmental Analysis Laboratory, Inc.

CLIENT: WPX Energy	Client Sample ID: BGT-1								
Project: Rosa Unit #019	Collection Date: 11/20/2017 10:36:00 AM								
Lab ID: 1711B11-001	Matrix:	SOIL	Received	1					
Analyses	Result	PQL Qual	Units	DF	Date Analyzed	Batch			
EPA METHOD 418.1: TPH	Υ				Analy	st: MAB			
Petroleum Hydrocarbons, TR	ND	19	mg/Kg	1	11/29/2017 11:00:00	AM 35148			
EPA METHOD 300.0: ANIONS					Analy	st: MRA			
Chloride	ND	30	mg/Kg	20	11/30/2017 1:01:06 A	M 35227			
EPA METHOD 8015M/D: DIESEL RA	NGE ORGANICS	;			Analy	st: TOM			
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	11/28/2017 7:32:24 P	M 35149			
Motor Oil Range Organics (MRO)	ND	51	mg/Kg	1	11/28/2017 7:32:24 P	M 35149			
Surr: DNOP	95.0	70-130	%Rec	1	11/28/2017 7:32:24 P	M 35149			
EPA METHOD 8015D: GASOLINE RA	ANGE				Analy	st: NSB			
Gasoline Range Organics (GRO)	ND	4.6	mg/Kg	1	11/27/2017 1:48:30 P	M 35130			
Surr: BFB	89.1	15-316	%Rec	1	11/27/2017 1:48:30 P	M 35130			
EPA METHOD 8021B: VOLATILES					Analy	st: NSB			
Benzene	ND	0.023	mg/Kg	1	11/27/2017 1:48:30 P	M 35130			
Toluene	ND	0.046	mg/Kg	1	11/27/2017 1:48:30 P	M 35130			
Ethylbenzene	ND	0.046	mg/Kg	1	11/27/2017 1:48:30 P	M 35130			
Xylenes, Total	ND	0.093	mg/Kg	1	11/27/2017 1:48:30 P	M 35130			
Surr: 4-Bromofluorobenzene	88.4	80-120	%Rec	1	11/27/2017 1:48:30 P	M 35130			

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

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	В	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	Н	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits Page 1 of 6
	ND	Not Detected at the Reporting Limit	Р	Sample pH Not In Range
	PQL	Practical Quanitative Limit	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

Client: WPX Energy Rosa Unit #019 **Project:**

Sample ID MB-35227	SampType: mblk	TestCode: EPA Method		
Client ID: PBS	Batch ID: 35227	RunNo: 47395		
Prep Date: 11/29/2017	Analysis Date: 11/29/2017	SeqNo: 1513735	Units: mg/Kg	
Analyte	Result PQL SPK value S	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Chloride	ND 1.5			
Sample ID LCS-35227	SampType: Ics	TestCode: EPA Method	300.0: Anions	
Sample ID LCS-35227 Client ID: LCSS	SampType: Ics Batch ID: 35227	TestCode: EPA Method RunNo: 47395	300.0: Anions	
			300.0: Anions Units: mg/Kg	
Client ID: LCSS	Batch ID: 35227	RunNo: 47395 SeqNo: 1513736	Units: mg/Kg	RPDLimit Qual

Qualifiers:

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

Page 2 of 6

WO#: 1711B11

01-Dec-17

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

Client: WPX Energy **Project:** Rosa Unit #019

Sample ID MB-35148	SampType: MBLK	TestCode: EPA Method	418.1: TPH	
Client ID: PBS	Batch ID: 35148	RunNo: 47392		
Prep Date: 11/27/2017	Analysis Date: 11/29/2017	SeqNo: 1512347	Units: mg/Kg	
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Petroleum Hydrocarbons, TR	ND 20			
Sample ID LCS-35148	SampType: LCS	TestCode: EPA Method	418.1: TPH	
Client ID: LCSS	Batch ID: 35148	RunNo: 47392		
Prep Date: 11/27/2017	Analysis Date: 11/29/2017	SeqNo: 1512348	Units: mg/Kg	
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Petroleum Hydrocarbons, TR	94 20 100.0	0 94.5 80.5	126	
Sample ID LCSD-35148	SampType: LCSD	TestCode: EPA Method	418.1: TPH	
Client ID: LCSS02	Batch ID: 35148	RunNo: 47392		
Prep Date: 11/27/2017	Analysis Date: 11/29/2017	SeqNo: 1512349	Units: mg/Kg	
Analyte	Result PQL SPK value	SPK Ref Val %REC LowLimit	HighLimit %RPD	RPDLimit Qual
Petroleum Hydrocarbons, TR	91 20 100.0	0 91.5 80.5	126 3.24	20

Qualifiers:

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

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QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

Client: WPX Energy **Project:**

Rosa Unit #019

Sample ID LCS-35149	SampType: L	CS	TestCode: EPA Method 8015M/D: Diesel Range Organics						
Client ID: LCSS	Batch ID: 3	5149	R	RunNo: 47353					
Prep Date: 11/27/2017	Analysis Date: 1	1/28/2017	S	eqNo: 1	511452	Units: mg/K	g		
Analyte	Result PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45 10	50.00	0	91.0	73.2	114			
Surr: DNOP	4.4	5.000		88.5	70	130			
Sample ID MB-35149	SampType: M	BLK	Test	tCode: EF	A Method	8015M/D: Die	esel Range	e Organics	
Client ID: PBS	Batch ID: 35149 RunNo: 47353								
Client ID. FD3	Batch ID: 3	5145	1		555				
Prep Date: 11/27/2017		1/28/2017		eqNo: 1		Units: mg/K	g		
		1/28/2017				Units: mg/K HighLimit	g %RPD	RPDLimit	Qual
Prep Date: 11/27/2017 Analyte	Analysis Date: 1	1/28/2017 SPK value	S	eqNo: 1	511453	0		RPDLimit	Qual
Prep Date: 11/27/2017	Analysis Date: 1 Result PQL	1/28/2017 SPK value	S	eqNo: 1	511453	0		RPDLimit	Qual

Qualifiers:

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

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QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client: Project:

WPX Energy Rosa Unit #019

Sample ID MB-35130	SampT	Гуре: Мі	BLK	Tes	TestCode: EPA Method 8015D: Gasoline Range					
Client ID: PBS	Batcl	h ID: 35	130	. F	RunNo: 47349					
Prep Date: 11/22/2017	Analysis Date: 11/27/2017			SeqNo: 1510598			Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	1000		1000		101	15	316			
							-			
Sample ID LCS-35130	SampT	Гуре: LC	s	Tes	tCode: El	PA Method	- 8015D: Gasc	oline Rang	e	
Sample ID LCS-35130 Client ID: LCSS	•	Гуре: LC h ID: 35			tCode: El RunNo: 4			oline Rang	e	
•	•	h ID: 35	130	F		7349	8015D: Gasc Units: mg/K		e	
Client ID: LCSS	Batcl	h ID: 35	130 1/27/2017	F	RunNo: 4	7349			e RPDLimit	Qual
Client ID: LCSS Prep Date: 11/22/2017	Batcl Analysis D	h ID: 35 Date: 11	130 1/27/2017	F	RunNo: 4 SeqNo: 1	7349 510600	Units: mg/K	(g		Qual

Qualifiers:

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

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QC SUMMARY REPORT Hall Environmental Analysis Laboratory, Inc.

Client: WPX Energy Project: Rosa Unit #019

Sample ID MB-35130	Samp	ype: MI	BLK	Tes	TestCode: EPA Method 8021B: Volatiles					
Client ID: PBS	Batch ID: 35130			F	RunNo: 47349					
Prep Date: 11/22/2017	Analysis E	Date: 1	1/27/2017	S	SeqNo: 1	510626	Units: mg/k	٢g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		100	80	120			
Sample ID LCS-35130	SampT	ype: LC	s	TestCode: EPA Method 8021B: Volatiles						
Client ID: LCSS	Batch	n ID: 35	130	F	RunNo: 47349					
Prep Date: 11/22/2017	Analysis D	ate: 11	1/27/2017	S	SeqNo: 1	510627	Units: mg/k	g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.96	0.025	1.000	0	95.7	77.3	128			
Toluene	0.95	0.050	1.000	0	95.4	79.2	125			
Ethylbenzene	0.94	0.050	1.000	0	94.4	80.7	127			
Xylenes, Total	2.9	0.10	3.000	0	95.2	81.6	129			
Surr: 4-Bromofluorobenzene	1.0		1.000		101	80	120			

Qualifiers:

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

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	L IRONMENTAL Lysis Oratory	Hall Environmenta All TEL: 505-345-397 Website: www.h	4901 Hav buquerque, N 5 FAX: 505-3	wkins NE M 87109 45-4107	Sam	ple Log-In Che	ck List
Client Name:	WPX ENERGY	Work Order Numbe	r: 1711B11			RcptNo: 1	
Received By:	Anne Thorne	11/21/2017 7:10:00 A	м	a	Pone Arm	~	
Completed By Reviewed By:		11/22/2017 7:25:21 A	М	a	Ime Arm	_	
Chain of Cu	()						
		0	Yes		No 🗌	Not Present	
	1. Custody seals intact on sample bottles?					Not Present	
	f Custody complete?		Yes 🗹				
3. How was t	the sample delivered?		<u>Courier</u>				
Log In					No 🗌		
4. Was an a	ttempt made to cool the sam	ples?	Yes 🗹		No 🗀	NAL	
5. Were all samples received at a temperature of $>0^{\circ}$ C to 6.0° C			Yes 🗹		No 🗌	NA	
6. Sample(s)	Yes 🖌		No 🗌				
7. Sufficient	sample volume for indicated	est(s)?	Yes 🗹		No 🗌		
8. Are samples (except VOA and ONG) properly preserved?			Yes 🖌		No 🗌		
9. Was prese	ervative added to bottles?	· · · · · · · · · · · · · · · · · · ·	Yes 🗌		No 🗹	NA 🗌	
10.VOA vials	have zero headspace?		Yes	÷	No 🗌	No VOA Vials	
11. Were any	sample containers received	proken?	Yes		No 🗹	# of preserved	
12. Does paperwork match bottle labels? (Note discrepancies on chain of custody)			Yes 🗹		No 🗆	bottles checked for pH: (<2 or >12	unless noted)
13. Are matrices correctly identified on Chain of Custody?			Yes 🗹		No 🗌	Adjusted?	
	4. Is it clear what analyses were requested?				No 🗌		
15. Were all holding times able to be met? (If no, notify customer for authorization.)			Yes 🖌		No 🗆	Checked by:	
(ii no, notii	y customer for authorization.						
Special Han	dling (if applicable)						
	notified of all discrepancies	with this order?	Yes		No 🗆	NA 🗹	
Pers	on Notified:	Date		A.A.J. Commission			
By W	/hom:	Via:	eMail [Phone	Fax	In Person	
Rega	arding:			AND DESCRIPTION OF THE OWNER, SAN TH			e
Clien	t Instructions:	NANESINANIN'I AMIN'NA MIN'NA MIN'NY TANÀNA MIN'NA MIN'NA MIN'NA MIN'NA MIN'NA MIN'NA MIN'NA MIN'NA MIN'NA MIN'N		Cheilbaidheile ann an		annaar an	
17. Additional	remarks:			. *			
18. <u>Cooler In</u> Cooler		Seal Intact Seal No Yes	Seal Date	Sign	ed By		
Page 1	of 1						

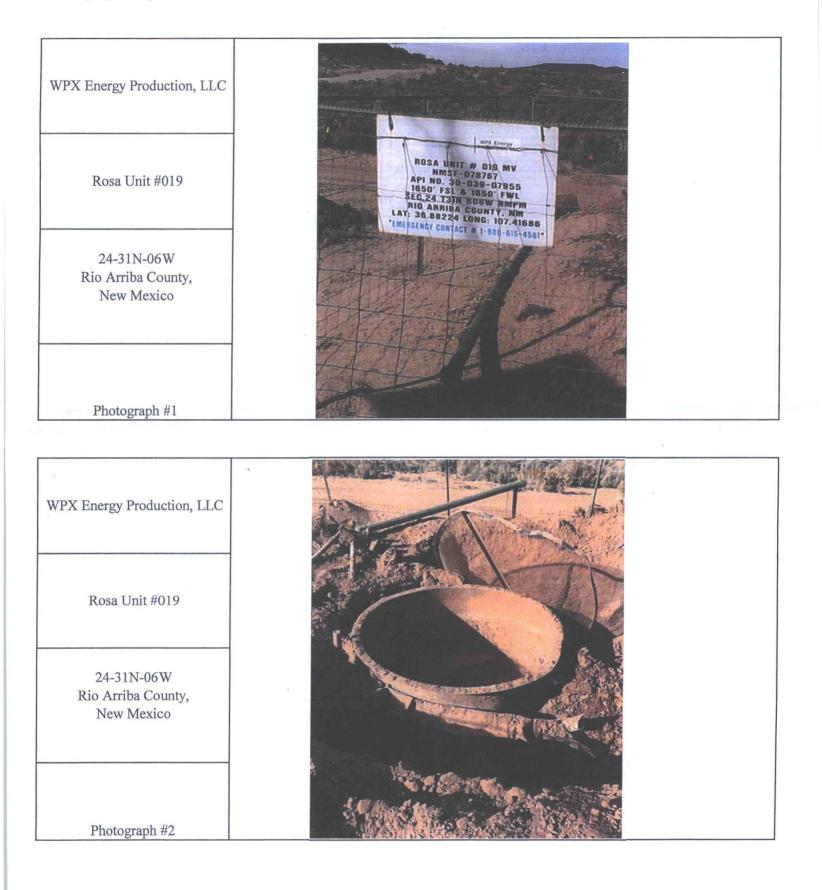
Client: WPX Energy Production, LLC			Turn-Around Time: X Standard □ Rush Project Name:			HALL ENVIRONMENTAL ANALYSIS LABORATORY															
Mailing Address: 721 S Main Aztec, NM 87410 Phone #: 505-333-1880			Rosa Unit #019 Project #:			www.hallenvironmental.com 4901 Hawkins NE - Albuquerque, NM 87109 Tel. 505-345-3975 Fax 505-345-4107 Analysis Request															
Phone #: 505-333-1880 email or Fax#: deborah.watson@wpxenergy.com QA/QC Package: X Standard X Standard □ Level 4 (Full Validation) Accreditation: □				Project Manager: Deborah Watson Sampler: DW / RB				PH (Gas only)	GRO/DRO)	1)	1)		narys	515 1	PCB's	uest					()
Date		□ Other_	Sample Request ID	On los: Sample item Container Type and #	(ମ୍ବିଶ୍ୱର	ELINO 1 HEAT-No.	BTEX (8021)	BTEX + MTBE + TPH (Gas only)	TPH 8015B (MRO/GRO/DRO)	TPH (Method 418.1)	EDB (Method 504.1)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (Chloride)	8081 Pesticides / 8082	8260B (VOA)	8270 (Semi-VOA)	-			Air Bubbles (Y or N)
11-20.17	1036	soil	B6T-1	1-4 oz glass	cold	1711 B11001	X		X	X	_			X							
																				_	
Date:	Time: 1524	Relinquish	ed by: M. Watu	Received by:		Date Time	Rer	nark	s:												
Date: Time: Relinquished by: 11/20/17/2010 Shret Walte			Received by	0	Date Time /////7 07/0																

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

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WPX Energy Production, LLC Rosa Unit #019 BGT Closure Report Photograph Log



WPX Energy Production, LLC Rosa Unit #019 BGT Closure Report Photograph Log

