District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

# State of New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-144 Revised April 3, 2017

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.

# Pit, Below-Grade Tank, or 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.
1.
Operator: WPX Energy Production, LLC OGRID #: 120782
Address: PO Box 640/721 S Main Aztec, NM 87410
Facility or well name: Rosa Unit #015
API Number: <u>30-039-07946</u> OCD Permit Number:
U/L or Qtr/Qtr H Section 29 Township 31N Range 5W County: Rio Arriba
Center of Proposed Design: Latitude N36.87332 Longitude W107.38064 OIL CONS. DIVEDIST. 3  Surface Owner: Federal State Private Tribal Trust or Indian Allotment
Pit: Subsection F, G or J of 19.15.17.11 NMAC  Temporary: □ Drilling □ Workover □ Permanent □ Emergency □ Cavitation □ P&A □ Multi-Well Fluid Management □ Low Chloride Drilling Fluid □ yes □ no □ Lined □ Unlined □ Liner type: Thickness □ mil □ LLDPE □ PVC □ Other □ String-Reinforced □ Liner Seams: □ Welded □ Factory □ Other □ Volume: □ bbl □ Dimensions: L □ x W □ x □  3. □ Below-grade tank: Subsection I of 19.15.17.11 NMAC  Volume: □ bbl Type of fluid: □ Produced Water  Tank Construction material: Fiberglass Tank w/Banded 30-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 □ Visible sidewalls and liner □ Visible sidewalls only □ Other □ Visible sidewalls Other □ Visible Sidew
Liner type: Thicknessmil
4.  Alternative Method:  Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
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)		
— Mondary inspections (if feeting of selecting is not physically leasible)		
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:  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	
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	
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. ( <b>Does not apply to below grade tanks</b> )  - 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	
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ 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.	☐ Yes ☐ No	
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image		
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	

<ul> <li>Within 100 feet of a wetland.</li> <li>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site</li> </ul>	☐ 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	
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		
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 documents are 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 19.15.17.9 NMAC 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: or Permit Number:		

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 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 Lake 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	documents are	
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	luid Management Pit	
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 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		
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 require justifications and/or demonstrations of equivalency. Please refer to 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		

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 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	
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 E of 19.15.17.13 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K 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  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  Waste Material Sampling Plan - based upon the appropriate requirements 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 H of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC		
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 believes	ef.	
Name (Print): Title:		
Signature: Date:		
e-mail address: Telephone:		
18.  OCD Approval: Permit Application (including closure plan) Closure Plan (only). OCD Conditions (see attachment)  OCD Representative Signature:  Approval Date: 106  OCD Permit Number:	19918	
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.  Closure Completion Date: November 20, 20	complete this	
20.  Closure Method:  Waste Excavation and Removal □ On-Site Closure Method □ Alternative Closure Method □ Waste Removal (Closed-lo	op systems only)	
☐ If different from approved plan, please explain.		

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this clobelief. I also certify that the closure complies with all applicable closure rec	
Name (Print):Deborah Watson	Title: Environmental Specialist
Signature:	Date:January 3, 2018
e-mail address:_ <u>deborah.watson@wpxenergy.com</u>	Telephone: <u>505-333-1880</u>

# WPX Energy Production Co., LLC San Juan Basin: New Mexico Assets

Below-Grade Tank Removal Closure Report Rosa Unit #015 (API #30-039-07946) Unit Letter H, Section 29, T31N, R05W 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.

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.

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. Results will be reported to the Division.

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.

Table 1: Closure Criteria for BGTs

Components	Testing Methods(1)	Closure Limits (2) (mg/kg)	Results (mg/kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2	<0.023
BTEX	EPA SW-846 Method 8021B or 8260B	50	<0.21
Total TPH	EPA SW-846 Method 418.1	100	<20
Chlorides	EPA 300.0	250	<30

<sup>(1)</sup> Or other test methods approved by the division

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.

<sup>(2)</sup> Numerical limits or natural background level, whichever is greater (19.15.17.13 NMAC)

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 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:

C-144 Closure Approval Surface Owner Notification (email) NMOCD Notification (email) Laboratory Analytical Report (#1711B42) Photograph log 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

Pit, Closed-Loop System, Below-Grade Tank, or

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.

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.
1.           Operator:Williams Production Co, LLCOGRID #:120782
Address:PO Box 640/721 So. Main, Aztec, NM 87410
Facility or well name:Rosa Unit #015
API Number:30-039-07946 OCD Permit Number:
U/L or Qtr/QtrH Section29 Township31 N Range05W County:Rio Arriba
Center of Proposed Design: Latitude36.85831 Longitude107.36289 NAD: ☐1927 ☒ 1983
Surface Owner: 🛮 Federal 🗌 State 🗀 Private 🗀 Tribal Trust or Indian Allotment
2.
Pit: Subsection F or G of 19.15.17.11 NMAC
Temporary:  Drilling  Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ Lined ☐ Unlined Liner type: Thicknessmil ☐ LLDPE ☐ 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)
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   Company   Other   Company   Drying Pad   Above Ground Steel Tanks   Haul-off Bins   Other   Drying Pad   Drying Pad   Above Ground Steel Tanks   Haul-off Bins   Other   Drying Pad   Dryi
☐ Lined ☐ Unlined Liner type: Thicknessmil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other
Liner Seams: Welded Factory Other RECEIVED

Alternative Method:

Liner type: Thickness

Tank Construction material:

Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

Below-grade tank: Subsection I of 19.15.17.11 NMAC

☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other

bbl Type of fluid: \_\_\_\_\_Produced Water

12\_\_\_\_mil HDPE PVC Other

🛮 Secondary containment with leak detection 🔲 Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off

Fiberglass w/Plastic Liner

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,	
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 19.15.3.103 NMAC		
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.  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	Yes No	
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	☐ 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	

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 19.15.17.12 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  Previously Approved Design (attach copy of design) API Number:  or Permit Number:
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)
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  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
Proposed Clearing 10 15 17 12 NIMAC
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)
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 G of 19.15.17.13 NMAC

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.1 Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if facilities are required.	O NMAC) more than two	
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 ser Yes (If yes, please provide the information below) No	vice and operations?	
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		
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	
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ☐ No	
Within a 100-year floodplain FEMA map	☐ Yes ☐ No	
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 19.15.17.13 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 H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC		

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):Michael K. Lane Title:Sr. Environmental Specialist
Signature: Date: 3/18/08
e-mail address:myke.lane@williams.com Telephone:
OCD Approval: Permit Application (including closure plan) Closure Plan (or provided plan) Permit Application (including closure plan) Closure Plan (or provided plan) Permit Approval Date: 8-27-08  Title: Fully Spec Hydrologist OCD Permit Number: na
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:
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.
Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:  Instructions: Please indentify 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:  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) \( \subseteq \text{No} \)
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
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
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): Title:
Signature: Date:
e-mail address: Telephone:

# 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 procedure for all out-of-service BGTs used to store produced liquids during production operations at oil and 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 shutin 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)*	100
	or Method 418.1	
Chlorides	EPA SW-846 Method 300.1	250

<sup>\*</sup> 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 recontoured 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, reseeding will be done at well abandonment, and following the procedure noted above.

From:

Watson, Debbie

To:

Fields, Vanessa, EMNRD; "ryan.darr@state.nm.us"; "Smith, Cory, EMNRD"

Cc:

Bradshaw, Rob; Watson, Debbie

Subject: Date: BGT Closure Notification Rosa Unit #015 Wednesday, November 15, 2017 1:04:00 PM

WPX will be closing the BGT at the Rosa Unit #015 on Monday, November 20, 2017, see note below.

Operator: WPX Energy Production, LLC

Well Name and API Number: Rosa Unit #015(30-039-07946)

Well Head Location: N36.8731537, W107.3804474

BGT Location: N36.873323, W107.380642

Surface Owner: New Mexico Department of Game and Fish

Location: Unit Letter H, Section 29, Township 31N, Range 5W, 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:

Fields, Vanessa, EMNRD; ryan.darr@state.nm.us; Smith, Cory, EMNRD

Subject: Date: Relayed: BGT Closure Notification Rosa Unit #015 Wednesday, November 15, 2017 1:04:48 PM

Attachments:

BGT Closure Notification Rosa Unit #015.msg

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server: Fields, Vanessa, EMNRD (Vanessa Fields@state.nm.us) < mailto: Vanessa. Fields@state.nm.us> 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> Subject: BGT Closure Notification Rosa Unit #015



Hall Environmental Analysis Laboratory 4901 Hawkins NE

Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107

Website: <u>www.hallenvironmental.com</u>

December 04, 2017

**Debbie Watson** 

WPX Energy 721 S Main Ave

Aztec, NM 87410

TEL: (505) 333-1880

FAX

RE: Rosa Unit 015

OrderNo.: 1711B42

### Dear Debbie Watson:

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 <a href="www.hallenvironmental.com">www.hallenvironmental.com</a> 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,

Andy Freeman

Laboratory Manager

andist

4901 Hawkins NE

Albuquerque, NM 87109

### **Analytical Report**

# Lab Order 1711B42

Date Reported: 12/4/2017

# Hall Environmental Analysis Laboratory, Inc.

**CLIENT:** WPX Energy

Client Sample ID: BGT-1

Project: Rosa Unit 015

**Collection Date:** 11/20/2017 11:43:00 AM

**Lab ID:** 1711B42-001

Matrix: SOIL

Received Date: 11/21/2017 7:10:00 AM

Analyses	Result	PQL Qu	al Units	DF	Date Analyzed	Batch
EPA METHOD 418.1: TPH			я		Analyst	MAB
Petroleum Hydrocarbons, TR	ND	20	mg/Kg	1	11/29/2017 11:00:00 A	M 35148
EPA METHOD 300.0: ANIONS					Analyst	MRA
Chloride	ND	30	mg/Kg	20	12/1/2017 12:07:26 AM	35246
EPA METHOD 8015M/D: DIESEL RANGE	ORGANICS	6			Analyst	: TOM
Diesel Range Organics (DRO)	ND	10	mg/Kg	1	11/28/2017 8:38:13 PM	35149
Motor Oil Range Organics (MRO)	ND	50	mg/Kg	1	11/28/2017 8:38:13 PM	35149
Surr: DNOP	97.1	70-130	%Rec	1	11/28/2017 8:38:13 PM	35149
EPA METHOD 8015D: GASOLINE RANG	E				Analyst	NSB
Gasoline Range Organics (GRO)	ND	4.7	mg/Kg	1	11/27/2017 2:58:44 PM	35130
Surr: BFB	89.9	15-316	%Rec	1	11/27/2017 2:58:44 PM	35130
<b>EPA METHOD 8021B: VOLATILES</b>					Analyst	NSB
Benzene	ND	0.023	mg/Kg	1	11/27/2017 2:58:44 PM	35130
Toluene	ND	0.047	mg/Kg	1	11/27/2017 2:58:44 PM	35130
Ethylbenzene	ND	0.047	mg/Kg	1	11/27/2017 2:58:44 PM	35130
Xylenes, Total	ND	0.093	mg/Kg	1	11/27/2017 2:58:44 PM	35130
Surr: 4-Bromofluorobenzene	88.5	80-120	%Rec	1	11/27/2017 2:58:44 PM	35130

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

### 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 Page 1 of 6
- P Sample pH Not In Range
- RL Reporting Detection Limit
- W Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

WO#:

1711B42

04-Dec-17

Client:

WPX Energy

Project:

Rosa Unit 015

Sample ID MB-35246

SampType: mblk

TestCode: EPA Method 300.0: Anions

Client ID:

**PBS** 

Batch ID: 35246

RunNo: 47438

Prep Date: 11/30/2017

HighLimit

Analysis Date: 11/30/2017 PQL

SeqNo: 1515504

Units: mg/Kg

Analyte Chloride

Result ND

SampType: Ics

1.5

TestCode: EPA Method 300.0: Anions

Client ID: LCSS

Batch ID: 35246

RunNo: 47438

Prep Date: 11/30/2017

Sample ID LCS-35246

Analyte

Analysis Date: 11/30/2017

SeqNo: 1515505

Units: mg/Kg

%RPD **RPDLimit** 

**RPDLimit** 

Result PQL

92.3

%RPD

Qual

Qual

Chloride

SPK value SPK Ref Val %REC LowLimit

SPK value SPK Ref Val %REC

LowLimit

90

HighLimit 110

14 1.5 15.00 0

Qualifiers:

Value exceeds Maximum Contaminant Level.

D Sample Diluted Due to Matrix

Holding times for preparation or analysis exceeded H

Not Detected at the Reporting Limit ND

**PQL** Practical Quanitative Limit

% Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank

Value above quantitation range

J Analyte detected below quantitation limits

Sample pH Not In Range

Reporting Detection Limit

P

Sample container temperature is out of limit as specified

Page 2 of 6

# Hall Environmental Analysis Laboratory, Inc.

WO#:

1711B42

04-Dec-17

Client:

WPX Energy

Project:

Rosa Unit 015

Sample ID MB-35148

SampType: MBLK

TestCode: EPA Method 418.1: TPH

Client ID:

Prep Date:

Analyte

PBS

11/27/2017

Batch ID: 35148

RunNo: 47392

Analysis Date: 11/29/2017 PQL

SeqNo: 1512347

Units: mg/Kg

Petroleum Hydrocarbons, TR

Result ND SPK value SPK Ref Val

%REC LowLimit

HighLimit

%RPD

%RPD

**RPDLimit** 

Qual

Client ID: LCSS

Sample ID LCS-35148

SampType: LCS Batch ID: 35148

PQL

20

20

RunNo: 47392

TestCode: EPA Method 418.1: TPH

Units: mg/Kg

**HighLimit** 

Analyte Petroleum Hydrocarbons, TR

Prep Date: 11/27/2017

Analysis Date: 11/29/2017

100.0

SeqNo: 1512348 SPK value SPK Ref Val %REC

LowLimit

126

**RPDLimit** 

Qual

Sample ID LCSD-35148

Client ID: LCSS02

SampType: LCSD

94

Result

TestCode: EPA Method 418.1: TPH

RunNo: 47392

94.5

80.5

Qual

Prep Date: 11/27/2017

Batch ID: 35148

Analysis Date: 11/29/2017

SeqNo: 1512349

Units: mg/Kg HighLimit

**RPDLimit** 

Analyte Petroleum Hydrocarbons, TR

SPK value SPK Ref Val %REC LowLimit

100.0

91.5

%RPD 3.24

20

**Oualifiers:** 

Value exceeds Maximum Contaminant Level.

Sample Diluted Due to Matrix D

Holding times for preparation or analysis exceeded H Not Detected at the Reporting Limit ND

Practical Quanitative Limit PQL

% Recovery outside of range due to dilution or matrix

Analyte detected in the associated Method Blank B

Value above quantitation range

Analyte detected below quantitation limits

Page 3 of 6

P Sample pH Not In Range

Reporting Detection Limit

Sample container temperature is out of limit as specified

# Hall Environmental Analysis Laboratory, Inc.

WO#:

1711B42

04-Dec-17

Client:

WPX Energy

**Project:** 

Rosa Unit 015

Sample ID LCS-35149	SampTyp	e: LC	S	Test	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: LCSS	Batch I	149	R										
Prep Date: 11/27/2017	Analysis Dat	te: 11	/28/2017 SeqNo: 1511452 U			Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	<b>RPDLimit</b>	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: MBLK TestCode: EPA Method 8015M/D: Diesel Range Organics										
Client ID: PBS	Batch ID: <b>35149</b> RunNo: <b>47353</b>										
Prep Date: 11/27/2017 Analysis Date: 11/28/2017 SeqNo: 151148					511453	Units: mg/K	(g				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual	
Diesel Range Organics (DRO)	ND	10									
Motor Oil Range Organics (MRO)	ND	50									
Surr: DNOP	8.9		10.00		89.4	70	130				

### Qualifiers:

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

Value above quantitation range

Page 4 of 6

# Hall Environmental Analysis Laboratory, Inc.

WO#:

1711B42

04-Dec-17

Client:

WPX Energy

Project:

Rosa Unit 015

Sample ID MB-35130

SampType: MBLK

TestCode: EPA Method 8015D: Gasoline Range

LowLimit

LowLimit

15

Client ID:

Batch ID: 35130

PQL

5.0

RunNo: 47349

Prep Date: 11/22/2017

Analysis Date: 11/27/2017

SeqNo: 1510598

Units: mg/Kg

Analyte

Result

ND

%REC

HighLimit

%RPD **RPDLimit**  Qual

Gasoline Range Organics (GRO) Surr: BFB

1000

1000

SPK value SPK Ref Val

SPK value SPK Ref Val %REC

101

316

Sample ID LCS-35130

SampType: LCS

TestCode: EPA Method 8015D: Gasoline Range

%RPD

Client ID: LCSS

Batch ID: 35130

PQL

5.0

RunNo: 47349

Analyte

Prep Date: 11/22/2017

Analysis Date: 11/27/2017

SeqNo: 1510600

Units: mg/Kg

**RPDLimit** Qual

Gasoline Range Organics (GRO) Surr: BFB

Result 25 1100

25.00 1000 99.6 113 75.9 15

131 316

HighLimit

### Qualifiers:

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

Page 5 of 6

# Hall Environmental Analysis Laboratory, Inc.

WO#:

1711B42

04-Dec-17

Client:

WPX Energy

**Project:** 

Rosa Unit 015

Sample ID MB-35130	SampT	ype: ME	BLK	Tes	tCode: El							
Client ID: PBS	Batch	ID: 35	130	RunNo: 47349								
Prep Date: 11/22/2017	Analysis D	ate: 11	/27/2017	SeqNo: 1510626			Units: mg/Kg					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual		
Benzene	ND	0.025										
Toluene	ND	0.050										
Ethylbenzene	ND	0.050										
Xylenes, Total	ND	0.10										
Surr: 4-Bromofluorobenzene	1.0		1.000		100	80	120					
Sample ID LCS-35130	SampT	ype: LC	CS TestCode: EPA Method				8021B: Volat	iles				
Client ID: LCSS	Batch	ID: 351	30	R	RunNo: 47	7349						

Prep Date: 11/22/2017	Analysis D	Date: 11	1/27/2017	8	SeqNo: <b>1510627</b> U		Units: mg/k	(g		
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	<b>RPDLimit</b>	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

Value shave quantitation range

lute detected below quantitation limits

Page 6 of 6



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

# Sample Log-In Check List

Client Name: WPX ENERGY	Work Order Number: 1	711B42		RcptNo:	1
	1/21/2017 7:10:00 AM 1/21/2017 5:30:54 PM		Am Am		
Chain of Custody					
1. Custody seals intact on sample bottles?	,	res 🗌	No 🗌	Not Present ✓	
2. Is Chain of Custody complete?		res 🗹	No 🗆	Not Present	
3. How was the sample delivered?	2	Courier			
<u>Log In</u>					
4. Was an attempt made to cool the samples?		Yes 🗸	No 🗆	NA □	
5. Were all samples received at a temperature of	>0° C to 6.0°C	′es ✓	No 🗆	NA 🗆	
6. Sample(s) in proper container(s)?		Yes 🗸	No 🗆		<b>8</b> 1
7. Sufficient sample volume for indicated test(s)?		res 🗹	No 🗆		
8. Are samples (except VOA and ONG) properly		′es ✓	No 🗔	,	
9. Was preservative added to bottles?	1	es 🗌	No 🗹	NA 🗆	
10.VOA vials have zero headspace?		es 🗌	No 🗆	No VOA Vials	
11. Were any sample containers received broken?		Yes	No 🗹		
				# of preserved bottles checked	
12. Does paperwork match bottle labels?	١	es 🗹	No 🗆	for pH:	·
(Note discrepancies on chain of custody)		es 🗸	No 🗔	(<2 o	r >12 unless noted)
13. Are matrices correctly identified on Chain of Cu 14. Is it clear what analyses were requested?		es 🗹	No 🗆		_
15. Were all holding times able to be met?		es 🗸	No 🗆	Checked by:	
(If no, notify customer for authorization.)		_	l	_	
Special Handling (if applicable)					
16. Was client notified of all discrepancies with this	s order?	es 🗆	No □	NA 🗹	1
Person Notified:	Date		,		
By Whom:	Via:	eMall 🔲 I	Phone  Fax	☐ In Person	
Regarding:  Client Instructions:			Marian Company of the Assessment of the Assessme		
17. Additional remarks:				, ,	
18. Cooler Information  Cooler No Temp °C Condition Seal	Intact   Seal No   Sea	II Date	Signed By		
1 1.2 Good Yes			Jigned Dy		

	Chain-of-Custody Record			Turn-Around	Turn-Around Time:					ь	IΔ	11	FI	NV	TR	20	NIN	4FI	MT	AI	
Client:	WPX	Energy	Production, LLC	X Standard						HALL ENVIRONMENTAL ANALYSIS LABORATORY											
				Project Name			www.hallenvironmental.com														
Mailing	Address	721 9	Main		t# 015		4901 Hawkins NE - Albuquerque, NM 87109														
		Azt	ec, NM 87410	Project #:						)5-34							4107				
Phone	#: 50	5-333-18	80					Ė.				A	naly	sis	Req	uest					
		leborah.v	watson@wpxenergy.com	Project Manager:				(Juny)							(0						П
	Package:			Deborah	Watson			as c	ORO						PCB's						
X Stan			Level 4 (Full Validation)	Camples Div	100		$\cdot$	H (G	RO/I						82 P						
Accredi  □ NEL		□ Other		Sampler: Div	D Yes		100	T T	0/0	8.1)	(1.4)	(F)		<u></u>	/ 80	-	2				2 Z
□ EDD				Sample Tem	penanne.		1)	BE	(MR	d 41	d 50	or P,	tals	oride	des	2	10/				30
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL 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)
1 00 17	1143	soil	36T-1	1-4 oz glass	cold	-001	X		X	-	Ш	00		X	8	80	89	+	+	+	A
1.20.17	1110	BOIL	POTT	1 102 81433	colu	001	1		7.	Λ							$\vdash$	-	+	+	+
							-											$\dashv$	+	+	+
							$\vdash$				_			-	$\vdash$	-	$\vdash$	$\dashv$	+	+	+
							+			$\vdash$	_					-		+	+	+	Н
							$\vdash$	_		-							-	+	+	+	H
										_	_	$\vdash$			_		-	$\rightarrow$	+	+	+
				_			$\vdash$								_			$\dashv$	+	+	+
							+	_						_			$\vdash$	$\rightarrow$	+	+	$\dashv$
							+	_		_	_	-	_	_		_		$\dashv$	+	+	H
				-			+				_		_	-	$\vdash$		Н	$\dashv$	+	+	+
				-			+		-		_		_					$\dashv$	+	+	+
Date:	Time:	Relinquish Relinquish	4 Water	Received by:	Rer	l nark	s:									1					
illzom	2010	M	the Walle	Un.	u In	11/4/11															
1	f necessary,	samples sub	mitted to Hall Environmental may be su	ocontracted to other a	octedited laboratoric	es. This serves as notice of th	is possi	Dility.	Any s	ub-con	uracte	d data	Will bi	e ciear	ny nota	ated o	n the a	nalytica	report.	ł.	

# WPX Energy Production, LLC Rosa Unit #015 BGT Closure Report Photograph Log

WPX Energy Production, LLC

Rosa Unit #015

29-31N-05W Rio Arriba County, New Mexico

Photograph #1

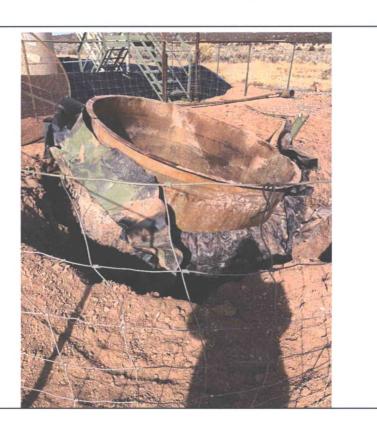


WPX Energy Production, LLC

Rosa Unit #015

29-31N-05W Rio Arriba County, New Mexico

Photograph #2



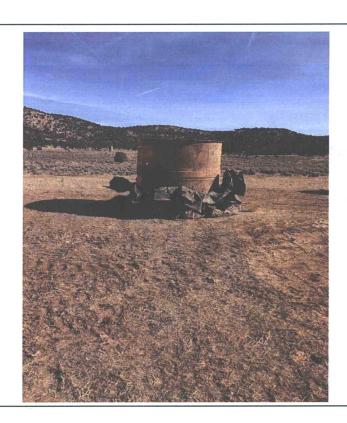
# WPX Energy Production, LLC Rosa Unit #015 BGT Closure Report Photograph Log

WPX Energy Production, LLC

Rosa Unit #015

29-31N-05W Rio Arriba County, New Mexico

Photograph #3



WPX Energy Production, LLC

Rosa Unit #015

29-31N-05W Rio Arriba County, New Mexico

Photograph #4

