

3R-364

2015

Investigation Work Plan

**Date:
11/9/15**

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

David R. Catanach, Division Director
Oil Conservation Division



New Mexico Oil Conservation Division approval and conditions
listed below are made in accordance with OCD Rule 19.15.5.11

Application Type:

P&A Drilling/Casing Change Location Change

Recomplete/DHC (For hydraulic fracturing operations review EPA
Underground injection control Guidance #84)

Other: Remediation/Investigation Work Plan

API WELL #	Well Name	Well #	Operator Name	Type	Stat	County	Surf_Owner	UL	Sec	Twp	N/S	Rng	W/E
30-045-21790	FLORANCE GAS COM J	016A	BP AMERICA PRODUCTION COMPANY	G	A	San Juan	F	P	6	30	N	9	W

Conditions of Approval:

Williams has submitted a Remediation/Investigation work plan for the Florance Gas Com J #16A 3RP-364. Williams's operators pipeline/gas gathering equipment on the referenced BP America well site.

- Williams will provide notification to the OCD 72 hours but no more than 1 week prior to the start of the physical implementation of the work plan.
- Williams will provide notification to the OCD 72 hours but no more than 1 week prior to the collection of any conformation soil/water samples.
- Williams may be required to do additional delineation/investigation contingent upon the results of the investigation.

If you have any questions please feel free to contact me at your leisure.



NMOCD Approved by Signature

11/19/15

Date

OIL CONS. DIV DIST. 3
NOV 16 2015



188 County Road 4900
Bloomfield, NM 87413
(505) 632-4700
Fax (505) 632-4782

Email and US Mail

November 9, 2015

Mr. Cory Smith
Environmental Specialist
New Mexico Oil Conservation Division
1000 Rio Brazos
Aztec, NM 87410

Re: Florance Gas Com J16A – Revised Proposed Investigation Work Plan,
3RP-364, San Juan County, New Mexico

Dear Mr. Smith,

In response to a meeting on September 22, 2015 between the New Mexico Oil Conservation Division (OCD) and the Bureau of Land Management (BLM), Williams Four Corners LLC (Williams) hereby submits the attached Proposed Investigation Work Plan for the Florance Gas Com J16A location.

Williams agrees to voluntarily conduct the scope of work set forth in the proposed investigation work plan based on the limited data that was provided by the OCD in September 2015. However by conducting this work, Williams does not admit liability or acknowledge that the release was caused by Williams' operations. In addition, if the results from this investigation indicate that the source(s) of contamination are not related to equipment owned by Williams, we expect that the OCD will require involvement from the responsible party.

Investigation Work Plan

The objective of the proposed scope of work is to identify the source(s) of hydrocarbon impact at the identified seeps. Based upon the prior assessment work, the actual source of contamination is not known, but there is evidence of soil and groundwater impacts beneath a former pit location adjacent to the Williams dehydrator unit. The scope of work is designed to identify the source(s) of contamination and provide characterization of the source type (e.g., hydrocarbon constituents).

The assessment will include a passive soil vapor survey using Gore-Sorbers[®], the collection of groundwater samples from the five existing monitoring wells and three seeps, and the collection of light non-aqueous phase liquid (LNAPL) samples from monitoring well MW-3 and the two seeps (if present) with observed LNAPL. The Gore-Sorber survey will involve establishing a grid pattern across the site similar to what is presented on the attached work plan figure. The actual locations will be determined following utility locations.

Specifically, Williams will conduct a source area assessment to include:

- Establish a 50-foot grid at the Site;
- Install Gore-Sorbers at 40 locations within the established grid;
- Install Gore-Sorbers at approximately 36-inches below ground surface (bgs). If bedrock is encountered, an attempt will be made to continue to install the Gore-Sorbers at the proposed depth of 36-inches bgs. The Gore-Sorbers shall be installed at a minimum depth of 24-inches bgs to ensure the soil gas is representative of subsurface conditions.
- Install Gore-Sorbers at up to 3 seep locations;
- Install Gore-Sorbers at up to 3 intermediate locations at areas of concern (to be determined in the field);
- Collect one round of groundwater samples and analyze the samples for petroleum VOCs using method 8260B and TPH-GRO (C₆-C₁₀), TPH-DRO (C₁₀-C₂₀), and TPH-ORO (C₂₈-C₄₀) using method 8015M. This includes collection of groundwater samples from all monitoring wells and the two seeps with observed LNAPL;
- Collect LNAPL samples from monitoring well MW-3 and the two seeps for PIANO analysis;

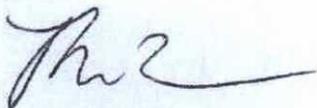
The work will be conducted during two mobilizations, the first to install the Gore-Sorbers (and collect the groundwater and LNAPL samples, if possible) and the second to retrieve the Gore-Sorbers for analysis. Gore-Sorbers will be installed using a portable hammer drill and allowed to set for a minimum of 7 days before retrieval for analysis. Following installation, each point will be located with GPS and identifier logged. After a minimum of 7 days, the modules will be retrieved and submitted to the laboratory for analysis. Gore-Sorber analysis will include USEPA Method 8260 with constituent list refined to petroleum hydrocarbons. Results are reported in an µg/unit manner. Following completion of the investigation, Williams will submit a report of the findings, including conclusions and recommendations for further assessment activities, if necessary.

Schedule

Upon OCD's approval of the work plan, Williams will initiate the investigation activities no later than the week of November 30, 2015 and submit a report to the OCD and BLM by January 15, 2016.

Please contact me at (505) 632-4442 with any questions regarding this work plan.

Sincerely,

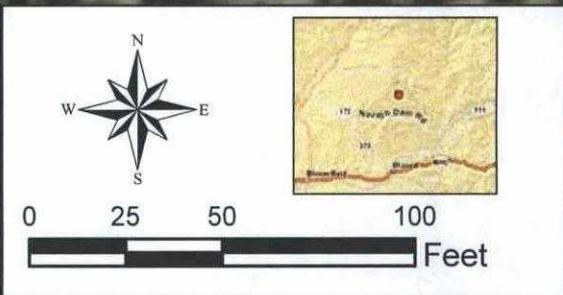


Matt Webre, PG
Supervisor, Environmental Services
Attachment: Proposed Investigation Work Plan – Florance Gas Com J16A

cc: Katerina Diemer, BLM



Monitoring_Well	Dehydrator	Former Pit Locations	BP Non-Potable Water Line
95_BGT_Tank_A	45_BGT_Tank	Gore_50_ft_sp_New	WFS Line
95_BGT_Tank_B	Meter	Main Seep	
Separator	Well Head	Secondary Seep	
Compressor	95_BGT_Remediation	BP Automation Line	
Product Tanks	Rem Collection Line	BP Gas Liquids Lines	
Steel Containment Ring	Concrete Trap		



Williams Four Corners LLC

**FLORANCE GC J 16A
SITE MAP**

CB&I Environmental & Infrastructure, Inc.
6380 South Fiddlers Green, Suite 310
Greenwood Village, CO 80111