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

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.

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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 #149B										
API Number: 3003926599 OCD Permit Number:										
Section 12E Township 31N Range 06W County RIO ARRIBA										
Latitude: 36.97133999999998 Longitude 107.42192 NAD: 1983 Surface Owner: <u>FEDERAL</u>										
Pit:       Subsection F or G of 19.15.17.11 NMAC         Temporary:       □ Drilling       □ Workover         □ Permanent       □ Emergency       □ Cavitation       □ P&A         □ Lined       □ Unlined Liner type: Thickness      mil       □ LLDPE       □ HDPE       □ PVC       □ Other         □ String-Reinforced       □ String-Reinforced       Unlined       □ Volume:      bbl       □ Dimensions:       □ 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										
A. Below-grade tank: Subsection I of 19.15.17.11 NMAC										
im vv. vii										
Volume: 120 bbl Type of fluid. PRODUCED WATER  Tank Construction material: FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINES. OIL CONS. DIV. DIST. 3										
Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off										
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										

Form C-144 WPX Closure Rosa Unit # 149B

Alternative Method:

Oil Conservation Division

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

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)	iospital,
Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify	
7.	
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)	
Screen Netting Other	
Monthly inspections (If netting or screening is not physically feasible)	
8.	
Signs: Subsection C of 19.15.17.11 NMAC	
12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers	
☑ Signed in compliance with 19.15.3.103 NMAC	
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 of consideration of approval.  Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	office for
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 accept material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate 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 drying above-grade tanks associated with a closed-loop system.	priate district pproval.
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 ☐ 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 improvious (continuous) of the proposed situal Aprial photos Setallita image.	☐ Yes ☐ No ☐ NA
<ul> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> <li>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.</li> <li>NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site</li> </ul>	☐ 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 19.15.17.11 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:
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  Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  Quality Control/Quality Assurance Construction and Installation Plan  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Nuisance or Hazardous Odors, including H <sub>2</sub> S, Prevention Plan  Emergency Response Plan  Oil Field Waste Stream Characterization  Monitoring and Inspection Plan  Erosion Control Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 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 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 I of 19.15.17.13 NMAC ☐ Site Reclamation 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 Ste Instructions: Please indentify the facility or facilities for the disposal of liquids, dri						
facilities are required.						
	isposal Facility Permit Number:					
Disposal Facility Name: Disposal Facility Permit Number:						
Will any of the proposed closed-loop system operations and associated activities occu ☐ Yes (If yes, please provide the information below) ☐ No	r on or in areas that will not be used for future serv	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 re Re-vegetation Plan - based upon the appropriate requirements of Subsection I of Site Reclamation Plan - based upon the appropriate requirements of Subsection	quirements of Subsection H of 19.15.17.13 NMAC of 19.15.17.13 NMAC	2				
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the cloprovided below. Requests regarding changes to certain siting criteria may require a considered an exception which must be submitted to the Santa Fe Environmental B demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for	dministrative approval from the appropriate distrureau office for consideration of approval. Justi	rict office or may be				
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 of	btained 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 of	btained 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 of	btained from nearby wells	☐ Yes ☐ No ☐ NA				
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other signif lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	icant watercourse or lakebed, sinkhole, or playa	☐ Yes ⊠ No				
Within 300 feet from a permanent residence, school, hospital, institution, or church in  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite in		☐ Yes ☑ No				
Within 500 horizontal feet of a private, domestic fresh water well or spring that less th watering purposes, or within 1000 horizontal feet of any other fresh water well or spring - NM Office of the State Engineer - iWATERS database; Visual inspection (ce.	ng, in existence at the time of initial application.	☐ Yes ⊠ No				
Within incorporated municipal boundaries or within a defined municipal fresh water vadopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval	-	☐ Yes ☒ No				
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual i	nspection (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 at	nd Mineral Division	☐ Yes ⊠ No				
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Society; Topographic map</li> </ul>	& Mineral Resources; USGS; NM Geological	☐ Yes ⊠ No				
Within a 100-year floodplain FEMA map		☐ Yes ⊠ No				
Non-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the fiby a check mark in the box, that the documents are attached.  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of Signature Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Signature Protocols and Procedures - based upon the appropriate requirements of 19.15.1 Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Signature Maste Material Sampling Plan - based upon the appropriate requirements of Signature Soil Cover Design - based upon the appropriate requirements of Subsection Plan - based upon t	rements of 19.15.17.10 NMAC absection F of 19.15.17.13 NMAC repriate requirements of 19.15.17.11 NMAC absed upon the appropriate requirements of 19.7.13 NMAC rements of Subsection F of 19.15.17.13 NMAC absection F of 19.15.17.13 NMAC action F of 19.15.17.13 NMAC	15.17.11 NMAC				

19.
Operator Application Certification:  The order contribute the information and write deviate the contribution in transport and complete the first of the least of many larger than the line.
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.
Name (Print): Title:
Signature: Date:
e-mail address Telephone:
20.
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)
OCD Representative Signature: Sig
Title: OCD Permit Number:
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: 8/20/10 Disposel Facilty name and permit #_S.J. Regional Landfill, NMED permit SWM-052426
Closure Method:  Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-loop systems only)  If different from approved plan, please explain.
23. Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: Instructions: Please 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:
Were the closed-loop system operations and associated activities performed on or in areas that <i>will not</i> be used for future service and operations?  Yes (If yes, please demonstrate compliance to the items below)
Required for impacted areas which will not be used for future service and operations:  Site Reclamation (Photo Documentation) Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique
24.
Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check
mark in the box, that the documents are attached.  Proof of Closure Notice (surface owner and division)
Proof of Deed Notice (required for on-site closure)
☐ Plot Plan (for on-site closures and temporary pits) ☐ Confirmation Sampling Analytical Results (if applicable)
Waste Material Sampling Analytical Results (required for on-site closure)
☐ Disposal Facility Name and Permit Number
☐ Soil Backfilling and Cover Installation ☐ Re-vegetation Application Rates and Seeding Technique
Site Reclamation (Photo Documentation)
On-site Closure Location: Latitude Longitude NAD: \[ \square 1927 \square 1983
25.
Operator Closure Certification:
I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.
Name (Print): Title: EH&S Coordinator
Signature: Date: 10-12-10
e-mail address: vanessa fields@williams.com Telephone: 505-634-4209

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 Timina:

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.I(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

#### **General Plan Requirements:**

- 1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current surface owner of record. The surface owner of record will be notified of the intent to closure the BGT by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner of record will be notified as soon as practical.
- 2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)
- 3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shutin until the rerouting is completed.
- 4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).
- 5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).
- 6. WPX will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as

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

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

Table 1: Closure Criteria for BGTs

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)

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

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

#### **Closure Report:**

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

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



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

March 10, 2009

Mr. Mark Kelly Bureau of Land Management Farmington Field Office 1235 La Plata Hwy. Farmington, NM 87401

Sent via Certified Mail

RE:

Notification of Production Pit Closure

Rule 19.15.17.13 NMAC

Production Pits associated Natural Gas Development

Operated by Williams Production Co, LLC

Pursuant to Rule 19.15.17 13 NMAC, this correspondence is to notify the Bureau of Land Management, Farmington Field Office, of Williams Production LLC's (Williams') intent to clean close all production pits on the attached list of wells operated with the District in San Juan County and Rio Arriba County, New Mexico Closure will follow the plan included with this correspondence.

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

Reshectfully submitted

Holly C. Perkins EH&S Specialist

Encl: Williams Production Pit Inventory List (Federal wells)

San Juan Basin - New Mexico Assets: Below-Grade Tank Closure Plan

cc: Environmental Fife

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 (BG1) on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico. This is WPX's standard closure procedure for all BG1s regulated under Rule 19.15.17 NMAC and operated by WPX. For those closures which do not conform to this standard closure plan, a separate well/pit specific closure plan will be developed and utilized.

#### Closure Conditions and Timing:

Pursuant to 19 15.17.13 (A) NMAC, WPX will initiate closure of any BG1 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 BG1 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 BGI out-of-service due to operational needs. Closure under these conditions will be closed within 60 days of cessation of the BGI's operation.
- BGIs 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 BG1 Closure except in the case of an emergency, WPX will review County Tax Records for the current surface owner of record. The surface owner of record will be notified of the intent to close the BG1 by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner of record will be notified as soon as practical.
- 2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)
- 3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...) The well will be temporarily shut in until the rerouting is completed.
- All produced water will be removed from the BG1 following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BG1 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).
- Solids and sludges will be shoveled and for vacuumed out for disposal at Envirotech (Permit Number NM-01-0011)
- wPX will obtain prior approval from NMOCl) to dispose recycle, reuse or reciain the BG1 and provide documentation of the disposition of the BG1 in the closure report. Stee materials will be recycled or reused as approved by the Division. Fiberglass tanks will be enably cut up or shredded, and EPA cleaned for disposal as solid waste. Liner materials will

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

- 7. Any equipment associated with the BG1 that is no longer required for some other purpose, tollowing the closure will be removed from the location.
- 8. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(E)(4) NMAC as identified in Table 1. Grab samples will be collected from any area that is wet, discolored or showing other evidence of a release. Results will be report to the Division following receipt from the lab on Form C-141.

Table 1: Closure Criteria for BGTs

Components	Jesting Methods	Closure Limits (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2
BIEX	EPA SW-846 Method 8021B or 8260B	50
IPH	EPA SW-846 Method 418.1(1)	100
Chlorides	EPA SW-846 Method 300.1111	250(2)

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

- 9 If the Division and/or WPX determine there is a release, WPX will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.
- 10. Upon completion of the tank removal, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot of top soil or background thickness whichever is greater and to existing grade. The surface will be recontoured to match the native grade and prevent ponding.
- 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 diilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (unimpacted) consisting at alleast three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. Note: If a surface owner agreement requires reseeding or other surface restoration that do not meet re-vegetation requirements of 19.15.17.13.1 NMAC then WPX will submit the proposed alternative with written documentation that the surface owner agrees to the alternative, for Division approval.
- 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 BG1 closure on a Closure Report using Division Form C-144. The Report will include the tollowing.

- Proof of Closure Notice (surface owner): NMOCE
- Backfilling & Cover installation
- Site Diagram with coordinate
- Available Inspection report

- Confirmation Sampling Analytical Results
- Disposal facility Name(s) and Fermit Number(s)
- Application Rate & Seeding technique:
- Photo Documentation of Reclamation

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

WELLS W/FEDERAL SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPI	E CONSTRUCTION MATERIAL
	<u> </u>	1 174 1	<u> </u>				
COX CANYON UNIT #001	3004511397	BLANCO MV	16N	32N	1 1W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
COX CANYON UNIT #001A	3004522086	BLANCO MV	16C	32N	11W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
COX CANYON UNIT #001B	3004530791	BLANCO MV	16L	32N	11W	BGT	HDPE SECONDARY LINER
COX CANYON UNIT #001C	3004532023	BLANCO MV	16E	32N	11W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
COX CANYON UNIT #003	3004511495	BLANCO MV	9L	32N	11W	BG1	HDPE SECONDARY LINER
COX CANYON UNIT #003A	3004522088	BLANCO MV	9P	32N	11W	BG1	DBL WALL STEEL
COX CANYON UNIT #003B	3004530871	BLANCO MV	9J	32N	11W	BGT	DBL WALL STEEL
COX CANYON UNIT #004	3004511368	BLANCO MV	21A	32N	11W	BGT	DBL WALL STEEL
COX CANYON UNIT #004A	3004522093	BLANCO MV	21P	32N	11W	BGT	DBL WALL STEEL
COX CANYON UNIT #004B	3004532186	BLANCO MV	21F	32N	11W	BG1	DBL WALL STEEL
COX CANYON UNIT #005	3004511326	BLANCO MV	21K	32N	1 1 VV	BGT	DBL WALL STEEL
COX CANYON UNIT #005A	3004522094	BLANCO MV	21D	32N	11W	BG1	DBL WALL STEEL
COX CANYON UNIT #005B	3004532142	BASIN DK / BLANCO MV	21N	32N	11W	BG1	DBL WALL STEEL
COX CANYON UNIT #005C	3004533493	BLANCO MV	21F	32N	11W	BG1	DBL WALL STEEL
COX CANYON UNIT #006	3004511463	BLANCO MV	16A	32N	11W	BGT	DBL WALL STEEL
COX CANYON UNIT #006A	3004522095	BLANCO MV	161	32N	11W	BG1	DBL WALL STEEL
COX CANYON UNIT #006B	3004532693	BLANCO MV	16B	32N	11W	BGT	DBL WALL STEEL
COX CANYON UNIT #006C	3004532733	BLANCO MV	160	32N	11W	BG1	DBI. WALL STEEL
COX CANYON UNIT #007	3004511455	BLANCO MV	17G	32N	11W	FGP	DBI. WALL STEEL
COX CANYON UNIT #007A	3004522091	BLANCO MV	170	32N	11W	BG1	DBL WALL STEEL
COX CANYON UNIT #007C	3004533018	BASIN DK	17K	32N	11W	BG1	DBL WALL STEEL
COX CANYON UNIT #008	3004511492	BLANCO MV	81	32N	11W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
COX CANYON UNIT #008A	3004522096	BLANCO MV	17H	32N	11W	BGT	DBL WALL STEEL
COX CANYON UNIT #008B	3004532080	BLANCO MV	8P	32N	11W	BG1	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
COX CANYON UNIT #008C	3004531187	BLANCO MV	17P	32N	11W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
COM COX CANYON UNIT #009B	3004522092	BLANCO MV BASIN DK /	20D	32N	11W	BGT	HDPE SECONDARY LINER
COM	3004533926	BLANCO MV	20B	32N	11W	BGT	DBL WALL STEEL
COX CANYON UNIT #009C	3003933851	BASIN DK / BLANCO MV	20F	32N	11W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
COX CANYON UNIT #013	3004521489	BLANCO PC	20A	32N	11W	BGT	HDPE SECONDARY LINER

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WELLS W/FEDERAL	4.51	FAAT	050	704/4/	D.10	D.T. EV.0.	OCHOTOLOTICAL MATERIAL
SURF MGT COX CANYON UNIT #023	API	FMT	SEC	TWN	RNG	PIT TYPE	
COM .	3004522537	BLANCO PC	17C	32N	11W	BGT	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
COX CANYON UNIT #025	3004522572	BLANCO PC	90	32N	11W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
COX CANYON UNIT #200	3004527878	BASIN FTC	9L	32N	11W	BG1	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
COX CANYON UNIT #200A	3004532126	BASIN FTC	90	32N	1 1 W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
COX CANYON UNIT #203	3004527872	BASIN FTC	17A	32N	1 I W	BGT	FIBERGI ASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
MADDOX #001	3004511487	BLANCO MV	10N	32N	11W	BG1	DBL WALL STEEL
MADDOX #001A	3004523539	BLANCO MV	10P	32N	11W	. BGT	DBL WALL STEEL
NM 32-11 #001	3004511309	BLANCO MV BASIN DK /	200	32N	11W	BG1	DBL WALL STEEL
NM 32-11 #001B COM	3004532024	BLANCO MV BASIN DK /	20J	32N	1 1 W	BGT	DBL WALL STEEL
NM 32-11 #001C COM	3004532804	BLANCO MV	20L	32N	11W	BGT	DBL WALL STEE! FIBERGLASS TANK w/BANDED 20-mil
NM 32-11 #002 COM	3004511380	BLANCO MV	19A	3211	11W	BGT	HDPE SECONDARY LINER
NM 32-11 #002A COM	3004529017	BLANCO MV	190	32N	11W	BGT	DBL WALL STEEL
NM 32-11 #002B COM	3004532670	BLANCO MV	191	32N	11W	BGT	DBL WALL STEEL
NM 32-11 #002C COM	3004533077	BLANCO MV	19G	32N	11W	BGT	DBL WALL STEEL
ROSA UNIT #001 SWD	3003927055	SWD BASIN DK /	231	31N	06W		DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #001E	3003925411	BLANCO MV BLANCO MV /	11P	31N	W80		HDPE SECONDARY LINER
ROSA UNIT #005A	3003925407	ROSA PC BASIN DK /	26P	31N	W80	BGT	DBL WALL STEEL
ROSA UNIT #005B	3003926927	BLANCO MV	26B	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #005Y	3003926078	BLANCO MV BLANCO MV /	26H	31N	06W		HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #008	3003907944	ROSA PC BLANCO MV /	26M	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #008	3003907944	ROSA PC BLANCO MV /	26M	31N	06W		HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #008A	3003925430	ROSA PC	26D	31N	06W		HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #008C	3003926944	BLANCO MV	26N	31N	06W		HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
POSA UNIT #009	3003907975	BLANCO MV BASIN DK /	11K	31N	06W	BGT	HDPE SECONDARY LINER
NOSA UNIT #009A	3003925584	BLANCO MV	11C	31N	W90		DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
OSA UNIT #009B	3003927042	BLANCO MV	11E	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
:OSA UNIT #010B	3003926556	BLANCO MV	13N	31N	06W		HDPE SECONDARY LINER
OSA UNIT #010C	3003926918	BLANCO MV	13N	31N	06W	BGT	DBL WALL STEEL
OSA UNIT #010C	3003926556	BLANCO MV	13N	31N	06W	BGT	DBL WALL STEEL

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WELLS W/FEDERAL	•						
SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	CONSTRUCTION MATERIAL
ROSA UNIT #012A	3003925900	BLANCO MV / ROSA PC BASIN DK /	15J	31N	06W	BG1	DBI. WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #012B	3003926555	BLANCO MV	15P	31N	06W	BG1	HDPE SECONDARY LINER
ROSA UNIT #012C	3003929486	BLANCO MV	15A	31N	06W	SGT	SINGLE WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #013	3003907936	BLANCO MV	31 <b>G</b>	31N	05W .	BG1	HDPE SECONDARY LINER FIBERGLASS TANK WBANDED 20-mil
ROSA UNIT #013A	3003926298	BLANCO MV BASIN DK /	31F	31N	05W	BG1	HDPE SECONDARY LINER
ROSA UNIT #013B COM	3003929834	BLANCO MV	31A	31N	05W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #014	3003907958	BLANCO MV	23B	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #014A	3003926280	BLANCO MV BASIN DK /	23P	31N	06W	BG1	HDPE SECONDARY LINER
ROSA UNIT #014C	3003930132	BLANCO MV	23H	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #015	3003907946	BLANCO MV	29H	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #016	3003907963	BLANCO MV	14N	31N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #016A	3003925496	BLANCO MV	14C	31N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #016B	3003926218	BLANCO MV	14M	31N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK WBANDED 20-mil
ROSA UNIT #017A	3003926272	BLANCO MV BASIN DK /	200	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #017B	3003926971	BLANCO MV BLANCO MV /	20J	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #018	3003907960	ROSA PC BLANCO MV /	22H	31N	06W	BG1	HDPE SECONDARY LINER
ROSA UNIT #018A	3003925436	ROSA PC	22P	31N	06W	SGT	DBL WALL STEEL
ROSA UNIT #018B	3003927052	BLANCO MV	220	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #019	3003907955	BLANCO MV	24K	31N		BG1	HDPE SECONDARY LINER FIBERGLASS TANK WBANDED 20-mil
ROSA UNIT #019B ROSA UNIT #019C	3003926560	BLANCO MV	241.	31N	06W	BG1	HDPE SECONDARY LINER
ROSA UNIT #019C	3003929625	BLANCO MV BLANCO MV	24D	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #019C	3003929625	•	24D	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSÁ UNIT #020A	3003907969	BLANCO MV	14G	31N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK WBANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #020B	3003925495	BLANCO MV	140	31N	06W	BGT	
ROSA UNIT #020C	3003926220	BLANCO MV BLANCO MV	14A 14J	31N 31N	06W		DBL WALL STEEL FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #021A	3003926221	BLANCO MV	23C	31N 31N	06W 06W		FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #021B	3003926121	BLANCO MV	23K	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #0215	3003926554	BLANCO MV	18A	31N	05W		FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
TOOK OILL NOZZ	3003301311	DETRITOO IVIV	- 10/1		00**	201	THE E OF COURT AND THE FINE IN

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WELLS W/FEDERAL							
SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	
ROSA UNIT #022A	3003926390	BLANCO MV	18C	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #023	3003907942	BLANCO MV	29M	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #023B	3003926553	BLANCO MV	29E	31N	05W	BGT	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #023C	3003927609	BASIN DK / BLANCO MV	29L	31N	05W	BG7	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #024	3003907933	BLANCO MV BASIN DK /	32M	31N	05W	BGT	HDPE SECONDARY LINER
ROSA UNIT #024A	3003925568	BLANCO MV BASIN DK /	32E	31N	05W	SGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #024B	3003926630	BLANCO MV BASIN DK /	32N	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #024C	3003926968	BLANCO MV BASIN DK /	32C	31N	05W	BGT	HDPE SECONDARY LINER
ROSA UNIT #026A	3003925580	BLANCO MV	320	31N	05W	SGT	DBL WALL STEEL
ROSA UNIT #026B	3003926788	BASIN DK	32G	31N	05W	SG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #029	3004511136	BLANCO MV BASIN DK /	32H	32N	06W		HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #029B	3004530709	BLANCO MV BASIN DK /	32B	32N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #029M	3004529584	BLANCO MV BASIN DK /	321	32N	06W		DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #030 COM	3003925570	BLANCO MV	120	31N	06W		HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #030A	3003926068	BLANCO MV	12M	31N	06W	BG7	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #030B	3003926601	BLANCO MV	12N	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #030C	3003929842	BLANCO MV	12P	31N	06W		DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #031	3003926279	BLANCO MV	17C	31N	05W		HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #031A	3003926346	BLANCO MV BASIN DK /	17l.	31N	05W		HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #031B	3003926579	BLANCO MV	17D	31N	05W		HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #031C	3003926578	BLANCO MV BLANCO MV /	17N	31N	05W	BGT	HDPE SECONDARY LINER
ROSA UNIT #032	3003925389	ROSA PC BLANCO MV /	21H	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #032A	3003925417	ROSA PC BASIN DK /	21F	31N	06W		DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #032B	3003926771	BLANCO MV BASIN DK /	21G	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #032C	3003927240	BLANCO MV	21F	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #034	3003907984	BLANCO MV	36B	32N	06W		HDPE SECONDARY LINER
ROSA UNIT #034A	3003926119	BLANCO MV	361	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #034A	3003926119	BLANCO MV	361	32N	06W		DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #034B	3003926629	BLANCO MV	36J	32N	06W		HDPE SECONDARY LINER

WELLS W/FEDERAL		F117					
SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	
ROSA UNIT #034C	3003926969	BLANCO MV	3611	32N	06W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #035X	3004510996	BLANCO MV	5K	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #036	3003907977	BLANCO MV	11H	31N	06W	BGT .	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #036C	3003930182	BLANCO MV	11G	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #041	3003907981	BLANCO MV BASIN DK /	5K	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #041B	3003927014	BLANCO MV	6P	31N	05W	BGT	HDPE SECONDARY LINER
ROSA UNIT #044	3003925873	BLANCO MV	35K	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #044A	3003926161	BLANCO MV	35E	32N	06W	SGT	SINGLE WALL STEEL
ROSA UNIT #044A	3003926161	BLANCO MV	35E	32N	06W	SGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #044B	3003926685	BLANCO MV	35C	32N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #045	3003923013	BLANCO MV BASIN DK /	9M	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #046A	3003926986	BLANCO MV	80	31N	05W	BG1	HDPE SECONDARY LINER
ROSA UNIT #051	3003920289	BASIN DK	23C	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #053	3003920293	BASIN DK	8B	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #055	3003920923	BASIN DK	341	31N	05W	BG1	HDPE SECONDARY LINER
ROSA UNIT #059 DK	3003923270	BASIN DK	25N	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #059 GL	3003923270	UNDES GL	25N	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #060	3004529798	BLANCO MV	4L	31N	06W		HDPE SECONDARY LINER
ROSA UNIT #064	3003921703	BASIN DK	29A	31N	05W	BGT	DBL WALL STEEL
ROSA UNIT #064	3003921703	BASIN DK BASIN DK /	29A	31N	05W	SGI	DBL WALL STEEL
ROSA UNIT #064M	3003925563	BLANCO MV	29F	31N	05W		DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #065	3003921702	BAŞIN DK	17A	31N	05W		HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #066	3003921758	BASIN DK BASIN DK /	13L	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #066M	3003925747	BLANCO MV	13F	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK WBANDED 20-mil
ROSA UNIT #072	3003925509	BLANCO MV	61	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #072A	3003925795	BLANCO MV	6K	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #075	3004529895	BLANCO MV	10L.	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #075A	3004529854	BLANCO MV	40	31N	06W	BGT	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #077	3003922538	DK/UNDES .GL/BLANCO	33L	31N	05W		FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER

WELLS W/FEDERAL SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	CONSTRUCTION MATERIAL
		BASIN DK /					
ROSA UNIT #079	3003922539	BLANCO MV BASIN DK /	22K	31N	06W	BGT	DBL WALI. STEEL
ROSA UNIT #079	3003922539	BLANCO MV BLANCO MV /	22K	31N	06W	SGT	DBL WALL STEEL
ROSA UNIT #079A	3003925412	ROSA PC BASIN DK /	22E	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #079B	3003926920	BLANCO MV	22C	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #079C	3003929902	BLANCO MV BASIN DK /	31P	31N	05W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #080	3003922537	BLANCO MV	8K	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK WBANDED 20-mil
ROSA UNIT #080A	3003926413	BLANCO MV	8F	31N	05W	· BG1	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #085	3003922778	BASIN DK	20A	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK WBANDED 20-mil
ROSA UNIT #085	3003922778	BLANCO MV	20A	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #085A	3003926314	BLANCO MV	20C	31N	05W	BG1	HDPE SECONDARY LINER
ROSA UNIT #085B	3003930130	BLANCO MV	20D	31N	05W	BGT	DBL WALL STEEL
ROSA UNIT #086	3003922766	UNDES GL BLANCO MV /	12W	31N	04W	SGT	SINGLE WALL STEEL
ROSA UNIT #088	3004525140	ROSA PC	8E	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #089	3003922782	BLANCO MV	34A	3211	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #089A	3003925512	BLANCO MV	340	32N	06W	BG1	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #089B	3003926851	BLANCO MV	341	32N	06W	BG1	DBL WALL STEEL
ROSA UNIT #089C	3003926674	BLANCO MV	34G	3214	06W	SG1	SINGLE WALL STEEL
ROSA UNIT #090 COM	3004525370	BLANCO MV	33G	32N	06W	BGT	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #090A COM	3004529259	BLANCO MV	33G	35N	06W	BGT	DBL WALL STEEL
ROSA UNIT #091	3003922780	BLANCO MV	35H	32N	06W	BG1	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #091A	3003925790	BLANCO MV .	350	32N	06W	SGT	DBL WALL STEEL
ROSA UNIT #091B	3003926684	BLANCO MV	35P	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #091C	3003926991	BLANCO MV	35G	32N	06W	BGT	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #098	3003923265	BASIN DK / GL	23L	31N	06W	BGT	FIBERGLASS TANK W/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #100B	3003929547	BASIN DK / BLANCO MV	210	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #100C	3003929851	BLANCO MV	21K	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #100E	3003925135	BLANCO MV / ROSA PC	211	31N	06W	SG1	SINGLE WALL STEEL
OSA UNIT #101M	3003925577	BLANCO MV	24F	31N	06W	BGT	DBL WALL STEEL
OSA UNIT #108	3003923506	BASIN DK / GL	7G	31N	05W	BG1	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER

WELLS W/FEDERAL SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	CONSTRUCTION MATERIAL
ROSA UNIT #119	3003925143	BASIN DK	18N	31N	05W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #125	3003925144	BLANCO MV	13B	31N	06W	BG1	HDPE SECONDARY LINER
ROSA UNIT #125C	3003929843	BLANCO MV BASIN DK /	13G	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #125E	3003925526	BLANCO MV	13J	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #129	3003926304	BLANCO MV	34E	32N	06W	BG1	DBL WALL STEEL
ROSA UNIT #129A	3003926297	BLANCO MV	34K	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #137	3003925410	BLANCO MV BLANCO MV /	31K	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #137A	3003926129	ROSA PC	311	31N	05W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #137B	3003927002	BLANCO MV BLANCO MV /	31P	31N	05W	BG1	HDPE SECONDARY LINER
ROSA UNIT #138	3004529147	ROSA PC	171	31N	06W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #138A	3004529134	BLANCO MV / ROSA PC	17H	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #138B	3004532168	BLANCO MV	17H	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #139A	3004529600	BLANCO MV	17M	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #140	3003925435	ROSA PC	22K	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #144	3003925421	ROSA PC	26A	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #145C	3004533086	BLANCO MV	16F	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #146A	3003925513	BLANCO MV	28N	31N	05W	BGT	FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
ROSA UNIT #146C	3003930187	BLANCO MV	28B	31N	05W	BGT	DBL WALL STEEL
ROSA UNIT #148	3003925493	BASIN DK	20	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #148A	3003925776	BLANCO MV	2N	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #148B	3003926985	BLANCO MV	2P	31N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #149	3003925501	BLANCO MV	12G	31N	06W	BG1	HDPE SECONDARY LINER
ROSA UNIT #149A	3003925807	BLANCO MV BASIN DK /	12F	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #149B	3003926599	BLANCO MV	12E	31N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #150	3004529229	BLANCO MV	32F	32N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #150A	3004529592	BLANCO MV	32M	32N	06W	BG1	DBL WALL STEEL
ROSA UNIT #150B	3004530874	BASIN DK / BLANCO MV	32D	32N	06W	BG1	DBL WALL STEEL
ROSA UNIT #150C	3004532157	BLANCO MV	32K	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #15	3004529267	BLANCO MV	33C	32N	06W	BGT	DBL WALL STEEL

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WELLS W/FEDERAL SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	CONSTRUCTION MATERIAL
ROSA UNIT #151A	3004529631	BLANCO MV	33L	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #151C	3004532196	BL ANCO MV	33N	32N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #152	3003925494	BLANCO MV	36E	32N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #152A	3003925695	BLANCO MV	36N	32N	06W	BGT	DBL WALL STEEL
ROSA UNIT #152B	3003926631	BLANCO MV	36C	32N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #152C	3003927635	BLANCO MV	36L	32N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #153	3003925524	BLANCO MV	170	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #153A	3003926329	BLANCO MV BASIN DK /	17A	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #153B	3003927603	BLANCO MV	171	31N	05W	BG1	HDPE SECONDARY LINER
ROSA UNIT #154	3003925893	BLANCO MV	7N	31N	05W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #154A	3003926274	BLANCO MV	7P	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #156	3004529661	BLANCO MV	9A	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #156A	3004529640	BLANCO MV BASIN DK /	91	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #159 COM	3003925583	BLANCO MV	190	31N	05W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #159A	3003926273	BLANCO MV	19N	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #15C	3003930111	BLANCO MV BLANCO MV /	29G	31N	05W	BGT	HDPE SECONDARY LINER
ROSA UNIT #160	3003925890	ROSA PC	250	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #160A	3003925818	BLANCO MV BASIN DK /	25N	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #160B	3003926962	BLANCO MV	25L	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #160C	3003929778	BLANCO MV	25J	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #162	3003926069	BLANCO MV	30K	31N	05W	BG1	HDPE SECONDARY LINER
ROSA UNIT #162B	3003929845	BLANCO MV	30P	31N	05W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #163	3003926345	BLANCO MV	24G	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #163A	3003926336	BLANCO MV	240	31N	06W	BG1	HDPE SECONDARY LINER
ROSA UNIT #163B	3003929921	BLANCO MV	24B	31N	06W	SGT	DBL WALL STEEL
ROSA UNIT #163C	3003929611	BLANCO MV BASIN DK /	24J	31N	06W	SGT	SINGLE WALL STEEL FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #164	3003926151	BLANCO MV	1J	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #164A	3003926080	BLANCO MV BASIN DK /	1 J	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
ROSA UNIT #1645	3003927242	BLANCO MV	1J	31N	06W	BGT	HDPE SECONDARY LINER

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WELLS W/FEDERAL SURF MGT	API	FM1	SEC	TWN	PNC	PIT TYPE	CONSTRUCTION MATERIAL
SONT MOT	AFI	BLANCO MV /	JL.C	IVVIV	KNG	rii iire	CONSTRUCTION MATERIAL
ROSA UNIT #165	3003926070	ROSA PC	25F	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #165A	3003926150	BLANCO MV BASIN DK /	25B	31N	06W	BG1	HDPE SECONDARY LINER
ROSA UNIT #165B	3003926557	BLANCO MV BASIN DK /	25E	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #165C	3003926961	BLANCO MV	25G	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #166	3003926275	BLANCO MV	30A	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #166A	3003926282	BLANCO MV	30F	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #167A	3004529886	BLANCO MV	8A	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #169	3003926130	BLANCO MV	3J	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #169A	3003926149	BLANCO MV	3J	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #169C	3003927717	BLANCO MV	2M	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #170	3003925851	BLANCO MV	21N	31N	06W	BG1	DBL WALL STEEL
ROSA UNIT #171	3003926286	BLANCO MV	7G	31N	05W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #171A	3003926389	BLANCO MV	7G	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #171B	3003927013	BLANCO MV	6P	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #180	3004529898	BLANCO MV	9N	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #180B	3004533134	BLANCO MV	91.	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #180C	3004533191	BLANCO MV	9E	31N	06W	BG7	DBL WALL STEEL
ROSA UNIT #181	3003926463	BLANCO MV	11K	31N	06W	BG1	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #181A ROSA UNIT #181C (shared	3003926312	BLANCO MV	15A	31N	06W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK W/BANDED 20-mil
w/169C)	3003927714	BLANCO MV	2M	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #182	3003926283	BLANCO MV	18N	31N	05W	BG1	HDPE SECONDARY LINER
ROSA UNIT #182A	3003926285	BLANCO MV	18P	31N	05W	BGT	DBL WALL STEEL
ROSA UNIT #182C	3003930180	BLANCO MV	18P	31N	05W	SG1	SINGLE WALL STEEL FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #183	3003926387	BLANCO MV	19G	31N	05W	BG1	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20-mil
ROSA UNIT #183A	3003926386	BLANCO MV	19F	31N	05W	BGT	HDPE SECONDARY LINER
ROSA UNIT #183B	3003930087	BLANCO MV BASIN DK /	19B	31N	05W	BG1	DBL WALL STEEL
ROSA UNIT #185B	3004532734	BLANCO MV	16F	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #185C	3004534484	BLANCO MV	16F	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #185	3003930186	BLANCO MV	21G	31N	05W	BG1	DBL WALL STEEL

WELLS W/FEDERAL SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	E CONSTRUCTION MATERIAL
ROSA UNIT #231	3003924444	BASIN FTC	31N	31N	05W	SG1	SINGLE WALL STEEL
ROSA UNIT #335A	3003930222	BASIN FTC	05J	31N	05W	SG1	SINGLE WALL STEEL

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#### Meador, Tasha

From: Lane, Myke

Sent: Tuesday, April 20, 2010 10:19 AM

To: Powell, Brandon, EMNRD

Cc: Meador, Tasha; Basye, Matt

Subject: RE: Notice of Closure - Rosa 148B

This is for the Rosa 148B on the 149 listed in the description below. Sorry.

Myke Lane

WPX - San Juan Basin EH&S Team Leader 505/634-4219 (off) 505/330-3198 (mob)

"Every new beginning starts with some other beginning's end!" --- Closing Time by Semisonic

From: Lane, Myke

Sent: Tuesday, April 20, 2010 10:16 AM

**To:** Powell, Brandon, EMNRD **Cc:** Meador, Tasha; Basye, Matt

Subject: Notice of Closure - Rosa 148B

Brandon: Williams tentatively plans to initiate closure of the following BGT later this week or next, depending on weather and available resources.

WELLSITE	API	FMT	SEC	TWN	RNG

Rosa #149 3003926985 BLANCO MV 2P 31N 06W

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

Michael K. (Myke) Lane, PE EH&S Team Leader - San Juan Basin Operations 721 S. Main/PO Box 640, Aztec, NM 87410 (505) 634-4219(off); -4205(fax); 330-3198(cell)

"The problems we face cannot be resolved at the same level of thinking as that which gave rise to them!"--- shared with me by Brent Hale

#### Fields, Vanessa

From:

Meador, Tasha

Sent:

Monday, August 16, 2010 2:06 PM

To:

Fields, Vanessa

Subject:

FW: Notice of Pit Closure - Rosa 149B

## Tasha Meador

EH&S Coordinator
Williams Exploration & Production
721 S Main Aztec, NM

Office: 505-634-4200 Direct:505-634-4241 Fax: 505-634-4205

tasha.meador@williams.com

From: Lane, Myke

**Sent:** Thursday, May 06, 2010 3:14 PM

**To:** Powell, Brandon, EMNRD **Cc:** Meador, Tasha; Basye, Matt

Subject: Notice of Pit Closure - Rosa 149B

Brandon: Williams tentatively plans to initiate closure of the following BGT later this week or next, depending on weather and available resources.

WELLSITE	API	FMT	SEC T	WN RNG	

Rosa #149B

3003926599

BLANCO MV

12E 31N 06W

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

Michael K. (Myke) Lane, PE EH&S Team Leader - San Juan Basin Operations 721 S. Main/PO Box 640, Aztec, NM 87410 (505) 634-4219(off); -4205(fax); 330-3198(cell)

"The problems we face cannot be resolved at the same level of thinking as that which gave rise to them!"---shared with me by Brent Hale

District I
1625 N. French Dr , Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Bis Parage Reed, Artes NM 87410 1000 Rio Brazos Road, Aztec, NM 87410 District IV 1220 S St. Francis Dr , Santa Fe, NM 87505

## State of New Mexico Energy Minerals and Natural Resources

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

Revised October 10, 2003

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

Form C-141

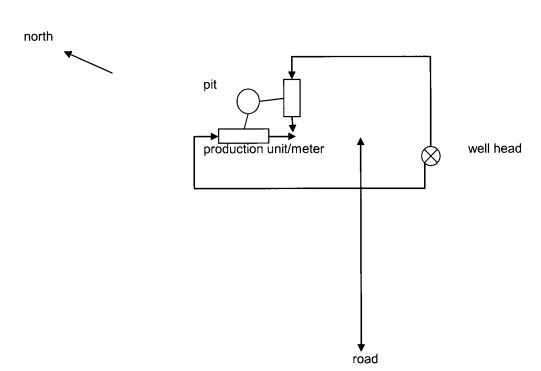
## **Release Notification and Corrective Action**

						<b>OPERAT</b>	OR	\	Initia	l Report		Final Report
Name of Cor	mpany V	WILLIAMS	PRODUC	CTION, LLC		Contact	Vanessa Fields					
Address	]	P.O. BOX 64	10, AZTE	C, NM 87410	[7	Telephone No. (505) 634-4209						
Facility Nam	ne Rosa U	nit #149B			]	Facility Type Well Site						
Surface Owr	ner Federa	1		Mineral Ov	vner				Lease N	lo.		
				1		I OE DEI	EACE		<u>.</u>			
I luit I attan	Castian	T	Damas			N OF REI	Feet from the	East/We	at Lina	County		
Unit Letter	Section	Township	Range	reet from the	North/	South Line	reet from the	East/we	st Line	County		
Е	12	31N	06W									
			Latitu	de_36.9713398_		Longitude	107.42192					
	NATURE OF RELEASE											
Type of Relea	se No Rele	ease Detected				Volume of	Release NA	\	/olume R	Recovered N	A	
Source of Rel						<del> </del>	our of Occurrenc	е Г	Date and	Hour of Disc	covery	NA
Was Immedia	te Notice (	_	Yes	No ⊠ Not Rec	quired	If YES, To NA	Whom?					
By Whom?	··-					Date and H	our					
Was a Waterc	ourse Read		V 57	L.XI.			lume Impacting t	he Waterc	ourse.			
16 11/4			Yes 🗵			NA						
If a Watercourse was Impacted, Describe Fully.* NA												
Describe Cau	as of Drobl	om and Dama	dial Astic	Tokon *								
Describe Cau	se of Floor	em and Keme	uiai Actioi	i Taken.								
214												
NA Describe Area	Δ ffected	and Cleanup	Action Tak	ren *				• • •				
Describe Area	Affected	and Cicanup 7	tetion ras	CII.								·
NA												
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Lhereby certit	fy that the i	information gi	ven above	is true and comple	ete to th	ne hest of my	knowledge and u	nderstand	that purs	uant to NM	OCD ri	ules and
				id/or file certain re								
				ce of a C-141 repor								
should their	perations h	ave failed to a	adequately	investigate and re	mediate	e contaminati	on that pose a thr	eat to grou	ind water	, surface wa	ter, hu	man health
or the environ federal, state,				tance of a C-141 r	eport de	oes not reliev	e the operator of	responsibi	lity for c	ompliance w	ith any	other
rederal, state,	oi rocai ia	ws allered legi	nations.				OIL CON	SFRVA	TION	DIVISIO	<u></u>	
( ,	. )		>,				OIL COIL	<u>DLIC V 1</u>	TION	DIVIDIC	711	
Signature: \		4007P	<u>_                                    </u>	ح ف								
Printed Name	: Vanessa	Fields				Approved by	District Supervis	or:				
Title: EH&S	Coordinate	or				Approval Dat	e:	Ex	piration	Date:		
E-mail Addre	ss: Vaness	sa.fields@will	iams.com			Conditions of	Approval:					
							**			Attached		
Date: 10-11-1	U		Phone: (	505) 634-4209								

<sup>\*</sup> Attach Additional Sheets If Necessary

## Williams Production Rosa 149 B Mesaverde/ Dakota Sec 12 31 N R 6 W

rectifer



Below-Grade Tank Removal Closure Plan

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

#### Closure Conditions and Timing:

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

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

#### **General Plan Requirements:**

- 1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current surface owner of record. The surface owner of record will be notified of the intent to 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.
- 2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)
- 3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shutin until the rerouting is completed.
- 4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).
- 5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).
- 6. WPX will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as

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

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

Table 1: Closure Criteria for BGTs

Components	<b>Jesting Methods</b>	Closule 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)

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

- 9. If the Division and/or WPX determine there is a release, WPX will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.
- 10. Upon completion of the tank removal, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot of top soil or background thickness whichever is greater and to existing grade. The surface will be recontoured to match the native grade and prevent ponding.
- 11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. Note: If a surface owner agreement requires reseeding or other surface restoration that do not meet the revegetation requirements of 19.15.17.13.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

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

Below-Grade Tank Removal Closure Plan

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

#### **Closure Conditions and Timing:**

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

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

#### General Plan Requirements:

- 1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current surface owner of record. The surface owner of record will be notified of the intent to 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.
- 2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)
- 3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shutin until the rerouting is completed.
- 4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).
- 5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).
- 6. WPX will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as

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

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

Table 1: Closure Criteria for BGTs

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)

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

#### Closure Report:

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

Production Pit: Fiberglass Below-Grade Tank

Although these tanks have performed well to protect the public health, welfare and environment, in accordance with Rule 19.15.17.13.A (4) NMAC, Williams will removed all BGTs constructed of fiberglass by June 16, 2013. These tanks do not meet the construction/design standards specified in 19.15.17.11 (1-4). The following plans describes the general design and construction (D&C) and Operations and Maintenance (O&M)of these production pits used on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico.

#### Design and Construction Plan

The pit is located as close as possible to the well and associated production/process equipment to minimize surface disturbance. The excavation bottom and sidewalls were compacted prior to installation of the pit. The BGT consisted of single-wall fiberglass tank following appropriate API and industry codes, placed in a 20-mil High-Strength Polyethylene resin (Permeability Rating – 0.041 USPerms), and the liner banded to the tanks. A 2" Sch-40 PVC riser was placed between the tank and liner as a leak-detection inspection port. See the attached Schematic and liner spec sheet. The pit is protected from runon by the construction of a compacted earthen berm. Fencing is constructed to protect livestock/wildlife as specified by the federal Surface Management Agency or, if not federal land/minerals requirements. WPX posts a well sign in accordance with the federal Surface Management Agency and rule 19.15.3.103.

#### Operations and Maintenance Plan

- 1. WPX only allows produced liquids meeting the RCRA exemption for O&G wastes to be stored in the SGT. WPX will not discharge or store any hazardous waste as defined under RCRA 40CFR 261 and 19.15.1.7.W(3) NMAC in any temporary pit. Produced water is disposed by evaporation or transport any of the following NMOCD approved facilities depending on the well location: Basin-Disposal, Inc in Bloomfield, New Mexico (Permit # NM-01-005), Williams Rosa SWD#1 (Permit # SWD-916), Williams Rosa #94 (Permit # SWD-758), Burlington Resources Jillson SWD#1 (Permit #R10168A), or other NMOCD approved water disposal facilities. WPX maintains sufficient freeboard for to prevent overtopping. Discharges to the pit will be shutoff if the liquid level does not provided sufficient free-board and liquid removal can not be scheduled in a timely manner. Any oil or hydrocarbon collecting on the pit is removed. Saleable condensate is returned to the sales tank. Slop oil from compression is recycled with Safety Kleen, Farmington, NM or Hydropure, Aztec, NM (No Permit Required).
- 2. If the tank integrity is compromised:
  - a. All discharges will be shut off to the pit.
  - b. All liquids will be removed as soon as possible but no more that within 24 hours of discovery
  - c. WPX will notify and report to NMOCD as follows:
  - i. If the release is less than 25 bbls, the Aztec District Office by phone or email within 48-hours of discovery and repair.
  - ii. If the release is suspected to be greater than 25 bbls, the Aztec District Office and the Environmental Bureau Chief by phone for immediate verbal notification pursuant to 19.15.3.116.B (1)(d).
  - d. Written Spill/Release reports will be submitted on Form C-141 per 19.15.3.116.C NMAC within 15 days to the Aztec District Office.
- 3. Berms around the perimeter of the pit, shall be maintained as protection from run-on.
- 4. WPX will inspect the BGT pit monthly. Electronic copies of the inspections will be kept at the WPX San Juan Basin office for a minimum of five years following completion. Copies of the inspections will be available to NMOCD upon request.

Production Pit: Below-Grade Tank Closure Plan

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

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

- Plot Plan (Pit Diagram)
- Available Inspection reports

- Sampling Results
- Waste disposal documentation

#### General Plan Requirements:

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

Table 1: Closure Criteria for BGTs

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

Production Pit: Fiberalass Below-Grade Tank

Although these tanks have performed well to protect the public health, welfare and environment, in accordance with Rule 19.15.17.13.A (4) NMAC, Williams will removed all BGTs constructed of fiberglass by June 16, 2013. These tanks do not meet the construction/design standards specified in 19.15.17.11 (1-4). The following plans describes the general design and construction (D&C) and Operations and Maintenance (O&M)of these production pits used on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico.

### Design and Construction Plan

The pit is located as close as possible to the well and associated production/process equipment to minimize surface disturbance. The excavation bottom and sidewalls were compacted prior to installation of the pit. The BGT consisted of single-wall fiberglass tank following appropriate API and industry codes, placed in a 20-mil High-Strength Polyethylene resin (Permeability Rating – 0.041 USPerms), and the liner banded to the tanks. A 2" Sch-40 PVC riser was placed between the tank and liner as a leak-detection inspection port. See the attached Schematic and liner spec sheet. The pit is protected from runon by the construction of a compacted earthen berm. Fencing is constructed to protect livestock/wildlife as specified by the federal Surface Management Agency or, if not federal land/minerals requirements. WPX posts a well sign in accordance with the federal Surface Management Agency and rule 19.15.3.103.

### Operations and Maintenance Plan

- 1. WPX only allows produced liquids meeting the RCRA exemption for O&G wastes to be stored in the SGT. WPX will not discharge or store any hazardous waste as defined under RCRA 40CFR 261 and 19.15.1.7.W(3) NMAC in any temporary pit. Produced water is disposed by evaporation or transport any of the following NMOCD approved facilities depending on the well location: Basin-Disposal, Inc in Bloomfield, New Mexico (Permit # NM-01-005), Williams Rosa SWD#1 (Permit # SWD-916), Williams Rosa #94 (Permit # SWD-758), Burlington Resources Jillson SWD#1 (Permit #R10168A), or other NMOCD approved water disposal facilities. WPX maintains sufficient freeboard for to prevent overtopping. Discharges to the pit will be shutoff if the liquid level does not provided sufficient free-board and liquid removal can not be scheduled in a timely manner. Any oil or hydrocarbon collecting on the pit is removed. Saleable condensate is returned to the sales tank. Slop oil from compression is recycled with Safety Kleen, Farmington, NM or Hydropure, Aztec, NM (No Permit Required).
- 2. If the tank integrity is compromised:
  - a. All discharges will be shut off to the pit.
  - b. All liquids will be removed as soon as possible but no more that within 24 hours of discovery
  - c. WPX will notify and report to NMOCD as follows:
  - i. If the release is less than 25 bbls, the Aztec District Office by phone or email within 48-hours of discovery and repair.
  - ii. If the release is suspected to be greater than 25 bbls, the Aztec District Office and the Environmental Bureau Chief by phone for immediate verbal notification pursuant to 19.15.3.116.B (1)(d).
  - d. Written Spill/Release reports will be submitted on Form C-141 per 19.15.3.116.C NMAC within 15 days to the Aztec District Office.
- 3. Berms around the perimeter of the pit, shall be maintained as protection from run-on.
- 4. WPX will inspect the BGT pit monthly. Electronic copies of the inspections will be kept at the WPX San Juan Basin office for a minimum of five years following completion. Copies of the inspections will be available to NMOCD upon request.

Production Pit: Below-Grade Tank Closure Plan

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

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

- Plot Plan (Pit Diagram)
- Available Inspection reports

- Sampling Results
- Waste disposal documentation

#### General Plan Requirements:

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

Table 1: Closure Criteria for BGTs

Components	TestingWethods!	Glosure Jimils (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	
<u>Chlorides</u>	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 re-contoured to match the native grade.
- 7. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. Note: WPX assumes the seeding stipulations including mix and seeding methods specified by the Surface Management Agency (BLM, BOR, USFS, Tribal, etc.) or Land owner as part of a surface use agreement or APD are Division-approved methods unless notified by the Division of their unacceptability.
- 8. For those portions of the former pit area required for production activities, re-seeding will be done at well abandonment, and following the procedure noted above.



## EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client:	WPX	Project #:	04108-0137
Sample ID:	BGT	Date Reported:	06-09-10
Laboratory Number:	54507	Date Sampled:	05-20-10
Chain of Custody No:	9504	Date Received:	06-01-10
Sample Matrix:	Soil	Date Extracted:	06-02-10
Preservative:		Date Analyzed:	06-03-10
Condition:	Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)	
Gasoline Range (C5 - C10)	0.6	0.2	
Diesel Range (C10 - C28)	1.2	0.1	
Total Petroleum Hydrocarbons	1.8	0.2	

ND - Parameter not detected at the stated detection limit.

References:

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

SW-846, USEPA, December 1996.

Comments:

Rosa 149B

Analyst

Review

Ph (505) 632-0615 Fr (800) 362-1879 Fy (505) 632-1865 Lah@envirotech-inc.com envirotech-inc.com



## **EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons**

## **Quality Assurance Report**

Client:	QA/QC	Project #:	N/A
Sample ID:	06-03-10 QA/QC	Date Reported:	06-09-10
Laboratory Number:	54495	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	06-03-10
Condition:	N/A	Analysis Requested:	TPH

	(INCA) Date	Hebbi Hibb	(0/0/) FF	o Difference	Accept Range
Gasoline Range C5 - C10	05-07-07	9.9960E+002	1.0000E+003	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	9.9960E+002	1.0000E+003	0.04%	0 - 15%

Blank(Gonez modez modke)	a Germentialion	Delegion Emile
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

Duplicate Conc. (mg/Kg)	Sample 3	Duplicate	9///Difference	Akid and Range
Gasoline Range C5 - C10	30.4	31.0	2.0%	0 - 30%
Diesel Range C10 - C28	76.7	67.4	12.1%	0 - 30%

Splice Sone (intelico)	PSemple **	SolkerAddateld	Spike Pestill	% Reignyery	Accept Range
Gasoline Range C5 - C10	30.4	250	277	98.7%	75 - 125%
Diesel Range C10 - C28	76.7	250	406	124%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References:

Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,

SW-846, USEPA, December 1996.

Comments:

QA/QC for Samples 54494-54497 and 54507.

Analyst



## **EPA METHOD 8021 AROMATIC VOLATILE ORGANICS**

Client:	WPX	Project #:	04108-0137
Sample ID:	BGT	Date Reported:	06-09-10
Laboratory Number:	54507	Date Sampled:	05-20-10
Chain of Custody:	9504	Date Received:	06-01-10
Sample Matrix:	Soil	Date Analyzed:	06-08-10
Preservative:		Date Extracted:	06-02-10
Condition:	Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)	
Benzene	40.6	0.0	
Toluene	4.5	0.9 1.0	
Ethylbenzene	7.0	1.0	
p,m-Xylene	37.5	1.2	
o-Xylene	10.2	0.9	
Total BTEX	99.8		

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	102 %
	1,4-difluorobenzene	100 %
	Bromochlorobenzene	102 %

References:

Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA,

December 1996.

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

USEPA, December 1996.

Comments:

Rosa 149B

Analyst

5796 US Highway 64 Farmington NM 87401 Ph (505)632-0615 Fr (800)/362-1879 Fy (505) 632-1865 Jah@anvirotach-inc.com anvirotach-inc.com



# **EPA METHOD 8021** AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample iD:	0608BBLK QA/QC	Date Reported:	06-08-10
Laboratory Number:	54624	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	06-08-10
Condition:	N/A	Analysis:	BTEX

Calibration and	TENTINE STATE	C-CaliRh Aecent Ran	94DIF# (21035169/65	Jank Jagona	A Detect
Benzene	1.2884E+006	1.2909E+006	0.2%	ND	0.1
Toluene	1.1722E+006	1.1745E+006	0.2%	ND	0.1
Ethylbenzene	1.0497E+006	1.0518E+006	0.2%	ND	0.1
p,m-Xylene	2.6107E+006	2.6159E+006	0.2%	ND	0.1
o-Xylene	9.7715E+005	9.7911E+005	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	. Pampile : Sampile	pleans	- Ŷadiie	ANGLE EIGHT BEITEICH	Coleg. Limit
Benzene	2.8	2.0	28.6%	0 - 30%	0.9
Toluene	6.1	6.0	1.6%	0 - 30%	1.0
Ethylbenzene	3.9	2.8	28.2%	0 - 30%	1.0
p,m-Xylene	3.8	3.1	18.4%	0 - 30%	1.2
o-Xylene	5.3	3.8	28.3%	0 - 30%	0.9

Spike Conc. (ug/kg)	Sample And	ilini Spikeri e Spik	ดังให้กับเกิด	<sup>1</sup> / <sub>te</sub> lÇ(e∕évye)y/	Accept Renge
Benzene	2.8	50.0	51.6	97.7%	39 - 150
Toluene	6.1	50.0	50.0	89.1%	46 - 148
Ethylbenzene	3.9	50.0	50.7	94.0%	32 - 160
p,m-Xylene	3.8	100	100	95.9%	46 - 148
o-Xylene	5.3	50.0	49.7	89.9%	46 - 148

ND - Parameter not detected at the stated detection limit.

References:

Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA,

December 1996,

Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

QA/QC for Samples 54507, 54623-54629, 54591, 54592 ar\d 54565.

Analyst



# **EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS**

Client:	WPX	Project #:	04108-0137
Sample ID:	BGT	Date Reported:	06-09-10
Laboratory Number:	54507	Date Sampled:	05-20-10
Chain of Custody No:	9504	Date Received:	06-01-10
Sample Matrix:	Soil	Date Extracted:	06-02-10
Preservative:		Date Analyzed:	06-02-10
Condition:	Intact	Analysis Needed:	TPH-418.1

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

**Total Petroleum Hydrocarbons** 

39.2

12.2

ND = Parameter not detected at the stated detection limit.

References:

Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water

and Waste, USEPA Storet No. 4551, 1978.

Comments:

Rosa 149B



# **EPA METHOD 418.1 TOTAL PETROLEUM HYROCARBONS** QUALITY ASSURANCE REPORT

N/A

N/A

06-09-10

06-02-10

Client: QA/QC Project #: Sample ID: QA/QC Date Reported: Laboratory Number: 06-02-TPH.QA/QC 54478 Date Sampled:

Sample Matrix: Freon-113 Date Analyzed: Preservative: N/A

Date Extracted: 06-02-10 Condition: N/A Analysis Needed: **TPH** 

Calibration ∷l-Cal Date C-Cal Date I-Cal RF: C-Cal RE: % Difference Accept. Range 04/22/2010 06-02-10 1,690 1,770 4.7% +/- 10%

Blank Conc. (mg/Kg) Detection Limit Concentration TPH ND 12.2

Duplicate Conc. (mg/Kg) Sample Duplicate -% Difference Accept, Range TPH 14.9 13.5 9.4% +/- 30%

Spike Conc. (mg/Kg) Sample Spike Added Spike Result % Recovery Accept Range **TPH** 14.9 2,000 1,930 80 - 120% 95.8%

ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water

and Waste, USEPA Storet No. 4551, 1978.

Comments: QA/QC for Samples 54478, 54486-54489, 54494-54497, 54507.



## Chloride

Client:	WPX	Project #:	04108-0137
Sample ID:	BGT	Date Reported:	06-09-10
Lab ID#:	54507	Date Sampled:	05-20-10
Sample Matrix:	Soil	Date Received:	06-01-10
Preservative:		Date Analyzed:	06-03-10
Condition:	Intact	Chain of Custody:	9504

Parameter

Concentration (mg/Kg)

**Total Chloride** 

25

Reference:

U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983. Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments:

Rosa 149B

# CHAIN OF CUSTODY RECORD

09504

Client:	•		Project Name / I			<u></u>								ANAL	YSIS .	/ PAR	AME	TERS		*************			
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Client Phone No.:		.   '	Client No.:	_ ou	108-6	1137	6	JW	TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion		TCLP with H/P		TPH (418.1)	CHLORIDE		•		Sample Cool	Sample Intact
Sample No./	Sample	Sample	Lab No.	1	ample	No./Volume of	$\overline{}$		I I	Ä	S	Ϋ́	tion	_	٦	エ	Ĭ,	1 S				dw	d d
Identification	Date	Time		<del>                                     </del>	/latrix	Containers	HgCi	HCI	트	B	3	본	පී	2	유	PAH	1	ㅎ				S	<u>S</u>
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State Waste Code

Route

Manifest .

Destination PO Profile Benerator VM of NM - San Juan County 78 County Road 3140 Aztec, NM, 87410 Ph: (505) 334-1121

Original Ticket# 127668

Customer Name WILLIAMSPRO WILLIAMS PRODUCTI Carrier
Ticket Date 05/21/2010 Vehicle#
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#

Check# Billing #. Gen EPA ID

JUN 0 1 2010

WPX

VAUOIL VAUGHN OILFIELD SERVICES! INC

· Voldide

Time In 05/21/2010 07:05:46 Out 05/21/2010 07:43:37

Scale Operator Inbound 301 MMORGAN Outbound 302 MMORGAN Inbound

0000114

Gross 45640 1b Tare 38920 1b Net 6720 1b Tons 3.36

Comments 9 PITS

Product	L.D%	Oty.	'UOM'	Rate	Так	Amount	Origin
1 MLY-MSW-Loose-	Yds 100	28.00	Yards	5.51	9, 55	\$154.28	RIOARRIBA

(NEDLY ME)

Marcus Cheney
Halo
T-12
Williams Production
Rosa 22,22A,36

Rosa 22,22A,36B,36, 9,9B,148B,149B,181C Total Tax Total Ticket

\$9.55 \$163.83

6





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

Below-Grade Tank Removal Closure Report

Well: (Rosa Unit# 149B)
API No: 30-03926599

Location: E-S12-T31N-R06W, NMPM



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

### **Closure Conditions and Timing:**

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

- The Division requires closure because of imminent danger to fresh water, public health or the environment.
- The integrity of the BGT fails. Notification will be within 48 hours to the Division and closure will be schedule as specified in 19.15.17.12 (A) (5) NMAC.
- WPX chooses to take the BGT out-of-service due to operational needs. Closure
  under these conditions will be initiated within 60 days of cessation of the BGT's
  operation.
- BGTs installed prior to June 16, 2008 that do not meet the requirements under 19.15.17.11.I(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

#### **General Plan Requirements:**

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

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

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

<u>Aztec District office was notified of Williams E&P intent to close on (05/06/2010). Email</u> attached.

3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shut-in until the rerouting is completed.

Williams closed the BGT used by the Rosa Unit# 149B separator and piped all liquids to the Produced Water Storage Tank.

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).

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

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

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

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

The fiberglass tank and plastic liner was disposed of at the San Juan Regional Landfill.

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

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

Components	Testing Methods	Closure Limits (mg/Kg)	Sample Results (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2	0.041
BTEX	EPA SW-846 Method 8021B or 8260B	50	0.1
TPH	EPA SW-846 Method 418.1(1)	100	39.2
Chlorides	EPA SW-846 Method 300 1(1)	250(2)	25

Table 1: Closure Criteria for BGTs

- (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 Williams determine there is a release, Williams will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.

No release detected.

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

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

11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. Note: WPX assumes the seeding stipulations including mix and seeding methods specified by the Surface Management Agency (BLM, BOR, USFS, Tribal, etc.) APD are Division-approved methods unless notified by the Division of their unacceptability. If a landowner agreement requires reseeding or other surface restoration that does not meet the revegetation requirements of 19.15.17.13., I then WPX will submit the proposed alternative with written documentation that the landowner agrees to the alternative, for Division approval.

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

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

### **Closure Report:**

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

- Proof of Closure Notice (surface owner & NMOCD)
- Backfilling & Cover Installation
- Site Diagram with coordinates
- Available Inspection reports

- Confirmation Sampling Analytical Results
- Disposal Facility Name(s) and Permit Number(s)
- Re-vegetation Application Rate & Seeding techniques
- Photo Documentation of Reclamation