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

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

Form C-144
July 21, 2008

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

7214

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

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

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

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

1.
Operator: WILLIAMS PRODUCTION COMPANY, LLC OGRID #: 120782
Address: PO Box 640 Aztec, NM 87410
Facility or well name: NM 32-11 #001A COM
API Number: 3004522087 OCD Permit Number: _____
Section 20N Township 32N Range 11W County SAN JUAN
Latitude. 36.966 Longitude 108.015 NAD: 1983 Surface Owner: PRIVATE

2.
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ Lined ☐ Unlined Liner type: Thickness _____mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____bbl Dimensions: L_____ x W_____ x D_____

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

RECEIVED
SEP 2010
OIL CONS. DIV.

4.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 120 bbl Type of fluid: PRODUCED WATER
Tank Construction material: FIBERGLASS TANK w/BANDED 20-mil HDPE SECONDARY LINER
☒ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

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

28

6.

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

☐ Chain link, six feet in height, two strands of barbed wire at top *(Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)*

☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet

☐ Alternate. Please specify_____

7.

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

☐ Screen ☐ Netting ☐ Other_____

☐ Monthly inspections (If netting or screening is not physically feasible)

8.

Signs: Subsection C of 19.15.17.11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☐ Signed in compliance with 19.15.3.103 NMAC

9.

Administrative Approvals and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

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

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

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

10.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

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

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - 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 inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☐ NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☐ No
Within a 100-year floodplain. - FEMA map	☐ Yes ☐ No

11.
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

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

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____

☐ Previously Approved Operating and Maintenance Plan API Number: _____ *(Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)*

13.
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H_2S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Closed-loop System ☐ Alternative

Proposed Closure Method: ☒ Waste Excavation and Removal
- ☐ Waste Removal (Closed-loop systems only)
- ☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
  - ☐ In-place Burial ☐ On-site Trench Burial
- ☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

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

16.
Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)
Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

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

Required for impacted areas which will not be used for future service and operations:
☐ Soil Backfill and Cover Design Specifications - - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC
Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

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

18.
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.
Operator Application Certification:

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

Name (Print): _____ Title:

Signature: _____ Date:

e-mail address: _____ Telephone:

20.
OCD Approval: ☐ Permit Application (including closure plan) ☒ Closure ~~Plan (only)~~ ☐ OCD Conditions (see attachment)

OCD Representative Signature: Jonathan D. Kelly **Approval Date:** 12/02/2011

Title: Compliance Officer **OCD Permit Number:** _____

21.
Closure Report (required within 60 days of closure completion): Subsection K of 19.15.17.13 NMAC

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

☒ **Closure Completion Date: 05/26/2010**

22.
Closure Method:

☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)

☐ If different from approved plan, please explain.

23.
Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:

Instructions: Please 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: San Juan Regional Landfill Disposal Facility Permit Number: NMED: SWM-052426

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

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

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

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

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

24.
Closure Report Attachment Checklist: ***Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.***

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

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

25.
Operator Closure Certification:

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

Name (Print): Tasha Meador Title: EH&S Specialist

Signature: Tasha Meador Date: 8/12/10

e-mail address: tasha.meador@williams.com Telephone: 505-634-4241

Meador, Tasha

From: Meador, Tasha
Sent: Wednesday, May 26, 2010 10:27 AM
To: 'Jones, Brad A., EMNRD'
Cc: Lane, Myke; 'Powell, Brandon, EMNRD'; Snyder, Walden
Subject: Request for Review Pit Closure - Holt 002, NM 001A, NM 002

Brad:

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

WELLSITE	API	FMT	SEC	TWN	RN
Holt 002	3004521486	BLANCO PC	19O	32N	11\
New Mexico 32-11 #001A	3004522087	BLANCO MV	20N	32N	11\
New Mexico 32-11 #002	3004511380	BLANCO MV	19A	32N	11\

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

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

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company **Williams Production**	Contact **Michael K. Lane**
Address **PO Box 640**	Telephone No. **505-634-4219**
Facility Name **NM 32-11 #001A (API: 30-045-22087)**	Facility Type **Well Site**

Surface Owner **BLM**	Mineral Owner **BLM**	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	**22**	**32 N**	**11W**					**San Juan**

Latitude 36.96600 **Longitude** -108.01509

NATURE OF RELEASE

Type of Release **Dissolved Phase Hydrocarbons in Produced Water**	Volume of Release **UNK**	Volume Recovered
Source of Release **Below-grade Tank**	Date and Hour of Occurrence **UNK**	Date and Hour of Discovery **During BGT Closure**
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom? **Brandon Powell-NMOCD (email)**	
By Whom? **Myke Lane**	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.

Describe Cause of Problem and Remedial Action Taken.

Lab results from BGT closure indicated historic release occurred. No visual evidence of spill observed at time of tank removal. Impacted soils excavated and taken to offsite commercial landfarm. Confirmation samples taken following excavation and removal following Spill Rule. Pit area to be reclaimed following approved Pit Closure Plan. Composite sample results and site map attached.

Describe Area Affected and Cleanup Action Taken.

Criteria	Site Condition	Ranking Score
Depth to Groundwater	50-100 (Cathodic - 160 ft BGS)	0
Wellhead Protection Area	None	0
Surface Water Body	>1000 ft	0
Total Ranking		0
Lab	**Results**	**Remediation Action Level**
Benzene (ppb)	<0.9	10,000
BTEX (ppb)	11.2	50,000
TPH by EPA - 418.1 (ppm)	338	5000
Cl (ppm)	5	--

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:

Printed Name: Michael K. Lane

Title: SJB EH&S Specialist

E-mail Address: myke.lane@williams.com

Date: 8/12/10 Phone: (505) 330-3198

OIL CONSERVATION DIVISION

Approved by District Supervisor:

Approval Date: Expiration Date:

Conditions of Approval: Attached ☐

* Attach Additional Sheets If Necessary

Lane, Myke

From: Lane, Myke
Sent: Tuesday, June 29, 2010 3:19 PM
To: Powell, Brandon, EMNRD
Cc: Meador, Tasha
Subject: NM 32-11 #001A - BGT Release Notice

Brandon:

Soil contamination above the current Pit Rule 19.15.17.13E closure levels has been detected during the removal of the below grade tank at the following well location.

NM 32-11 #001A 30-045-222087 120N-T32N-R11W NMPM San Juan Co

Reclamation will be done in accordance with the closure plan and NMOCD Guidelines for Remediation of Leaks, Spills & Releases. Please let us know if there are any questions.

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

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

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

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

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

[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.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

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

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

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

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

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

General Plan Requirements:

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

2. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed of by injection at one of the Williams Production Rosa Unit Salt Water Disposal wells: Rosa SWD #1 (API: 30-039-27055) I-23-31N-06W Permit - SWD-916 or Rosa Unit #94 (API: 30-039-23035) K-16-31N-05W, Permit - SWD-758.

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

4. The BGT and all associated materials will be removed, and recycled, reused, or disposed. of in a Division-approved facility. All materials that can not be recycled or reused will be treated a solid waste and will be disposed of at a licensed disposal facility (probably San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426).

5. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(B)(1)(b) NMAC. In the event that the criteria are not met (See Table 1), a release will be reported following Rule 116 and impacted soils will be excavated and hauled to Envirotech Landfarm near Bloomfield, NM (NMOCD Permit NM-01-0011). Approval to haul will be requested of the Aztec District office prior to initiation.

Table 1: Closure Criteria for BGTs

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

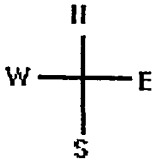
* Preferred method

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

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

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

MM 32.11 #4



N.M. 32-11 #1A

meter house

PROD. UNIT

Fiberglass Pit

well head

04-41

04-41

New Mexico 32-11 #1A

Date	WellName	Run	Formation	Construction	BGT, Above	Liner Plastic liner,	Leak detection Y/N	Leak detection level	Pit level	s / Repairs
8/26/2008	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	Plastic Liner	Yes	0	16	
9/30/2008	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	Plastic Liner	Yes	4	28	
11/21/2008	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	0	21	
12/14/2008	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	2"	30"	
1/10/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
2/14/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
3/22/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	6"	21"	
4/29/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
5/16/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	6"	31"	
6/12/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	6"	37"	
7/26/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
8/24/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
9/18/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	0	25	
10/19/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
11/21/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			

12/28/2009	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
1/29/2010	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	0	16	
2/24/2010	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
3/18/2010	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES			
4/15/2010	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	0	75	
5/24/2010	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	0	58	
6/14/2010	#001A COM	04-41	Mesa Verde	FIBERGLASS	BGT	NO	YES	0	67	

envirotech
Analytical Laboratory

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Client:	Williams	Project #:	00068-0146
Sample ID:	BGT	Date Reported:	06-25-10
Laboratory Number:	54816	Date Sampled:	06-18--10
Chain of Custody No:	9589	Date Received:	06-21-10
Sample Matrix:	Soil	Date Extracted:	06-22-10
Preservative:		Date Analyzed:	06-22-10
Condition:	Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	**13.4**	**0.2**
Diesel Range (C10 - C28)	**20.2**	**0.1**
Total Petroleum Hydrocarbons	**33.6**	**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: **NM 32-11 1A**

Analyst

Review

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Analytical Laboratory

EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	06-22-2010 QA/QC	Date Reported:	06-25-10
Laboratory Number:	54794	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	06-22-10
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range
Gasoline Range C5 - C10	06-22-10	9.9960E+002	1.0000E+003	0.04%	0 - 15%
Diesel Range C10 - C28	06-22-10	9.9960E+002	1.0000E+003	0.04%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
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	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	ND	0.1	0.0%	0 - 30%
Diesel Range C10 - C28	1.5	1.4	6.7%	0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	ND	250	258	103%	75 - 125%
Diesel Range C10 - C28	1.5	250	295	117%	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 54794-54799, 54815-54817, 54821**

Analyst

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EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	Williams	Project #:	00068-0146
Sample ID:	BGT	Date Reported:	06-25-10
Laboratory Number:	54816	Date Sampled:	06-18-10
Chain of Custody:	9589	Date Received:	06-21-10
Sample Matrix:	Soil	Date Analyzed:	06-22-10
Preservative:		Date Extracted:	06-22-10
Condition:	Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	**ND**	**0.9**
Toluene	**2.0**	**1.0**
Ethylbenzene	**1.4**	**1.0**
p,m-Xylene	**3.5**	**1.2**
o-Xylene	**4.3**	**0.9**
Total BTEX	**11.2**	

ND - Parameter not detected at the stated detection limit.

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

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: **NM 32-11 1A**

Analyst

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EPA METHOD 8021
AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	0622BBLK QA/QC	Date Reported:	06-25-10
Laboratory Number:	54794	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	06-22-10
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF:	%Diff. Accept. Range 0 - 15%	Blank Conc	Detect. Limit
Benzene	1.1881E+006	1.1904E+006	0.2%	ND	0.1
Toluene	1.0933E+006	1.0955E+006	0.2%	ND	0.1
Ethylbenzene	9.8418E+005	9.8615E+005	0.2%	ND	0.1
p,m-Xylene	2.4160E+006	2.4209E+006	0.2%	ND	0.1
o-Xylene	9.0836E+005	9.1018E+005	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect. Limit
Benzene	ND	ND	0.0%	0 - 30%	0.9
Toluene	2.5	3.2	28.0%	0 - 30%	1.0
Ethylbenzene	1.6	2.0	25.0%	0 - 30%	1.0
p,m-Xylene	3.7	4.8	29.7%	0 - 30%	1.2
o-Xylene	4.2	5.4	28.6%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	50.0	48.3	96.7%	39 - 150
Toluene	2.5	50.0	46.8	89.1%	46 - 148
Ethylbenzene	1.6	50.0	46.2	89.5%	32 - 160
p,m-Xylene	3.7	100	92.0	88.7%	46 - 148
o-Xylene	4.2	50.0	45.9	84.8%	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.

Comments: **QA/QC for Samples 54794, 54795-54799, 54815-817, 54821**

Analyst

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EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS

Client:	Williams	Project #:	00068-0146
Sample ID:	BGT	Date Reported:	06-25-10
Laboratory Number:	54816	Date Sampled:	06-18-10
Chain of Custody No:	9589	Date Received:	06-21-10
Sample Matrix:	Soil	Date Extracted:	06-23-10
Preservative:		Date Analyzed:	06-23-10
Condition:	Intact	Analysis Needed:	TPH-418.1

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
Total Petroleum Hydrocarbons	**338**	**5.4**

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: **NM 32-11 1A**

Analyst

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EPA METHOD 418.1
TOTAL PETROLEUM HYROCARBONS
QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	QA/QC	Date Reported:	06-25-10
Laboratory Number:	54821	Date Sampled:	N/A
Sample Matrix:	Freon-113	Date Analyzed:	06-23-10
Preservative:	N/A	Date Extracted:	06-23-10
Condition:	N/A	Analysis Needed:	TPH

Calibration	I-Cal Date	C-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range
	06-03-10	06-23-10	1,686	1,770	5.0%	+/- 10%

Blank Conc. (mg/Kg)	Concentration	Detection Limit
TPH	ND	5.4

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
TPH	6.7	6.7	0.0%	+/- 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
TPH	6.7	2,000	1,650	82.2%	80 - 120%

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 54821, 54828, 54829, 54830, 54811-54817.**

Analyst

Review

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Chloride

Client:	Williams	Project #:	00068-0146
Sample ID:	BGT	Date Reported:	06-28-10
Lab ID#:	54816	Date Sampled:	06-18-10
Sample Matrix:	Soil	Date Received:	06-21-10
Preservative:		Date Analyzed:	06-23-10
Condition:	Intact	Chain of Custody:	9589

Parameter	Concentration (mg/Kg)
Total Chloride	**5**

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: **NM 32-11 1A**

Analyst

Review

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CHAIN OF CUSTODY RECORD

09589

Client:	Project Name / Location:
Williams	NM 32-11 1A
Client Address:	Sampler Name:
721 S. Main	Dave Sneddan
Client Phone No.:	Client No.:
634-4241	00068-0146

ANALYSIS / PARAMETERS

Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative $HgCl_2$	Preservative HCl		TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	PAH	TPH (418.1)	CHLORIDE				Sample Cool	Sample Intact
BGT	6/18/10	9:22	54815	(Soil) Solid Sludge Aqueous	1 4oz				X	X							X	X				N	Y
				Soil Solid Sludge Aqueous																			
				Soil Solid Sludge Aqueous																			
				Soil Solid Sludge Aqueous																			
				Soil Solid Sludge Aqueous																			
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				Soil Solid Sludge Aqueous																			
				Soil Solid Sludge Aqueous																			

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Natasha Meador	6/21/10	11:40	[signature]	6/21/10	11:40
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Williams Production Co., LLC
San Juan Basin: New Mexico Assets
Below-Grade Tank Removal
Closure Report

Well: (NM 32-11 A#001A)
API No: 30-04522087
Location: N-S20-T32N-R11W, 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)

Aztec District office was notified of Williams E&P intent to close on (05/26/2010). Email 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 NM 32-11 #001A 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).

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

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

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

6. 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.

Table 1: Closure Criteria for BGTs

Components	Testing Methods	Closure Limits (mg/Kg)	Sample Results (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2	ND
BTEX	EPA SW-846 Method 8021B or 8260B	50	11.2
TPH	EPA SW-846 Method 418.1[1]	100	338
Chlorides	EPA SW-846 Method 300.1[1]	250[2]	5

[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.

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

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

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

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

See above notes.

Closure Report:

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

- Proof of Closure Notice (surface owner & NMOCD)
- 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