

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

9393
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: ROSA UNIT #018B
API Number 3003927052 OCD Permit Number. _____
Section 22O Township 31N Range 06W County RIO ARriba
Latitude: 36 880279999999999 Longitude 107 447779999999999 NAD. 1983 Surface Owner FEDERAL

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 _____
RCVD JAN 5 '12
OIL CONS. DIV.
DIST. 3

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 _____

4.
☒ **Below-grade tank:** Subsection I of 19 15.17 11 NMAC
Volume: 120 bbl Type of fluid. PRODUCED WATER
Tank Construction material DBL WALL STEEL
☒ 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

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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)

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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

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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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application (<i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i>) - Visual inspection (certification) of the proposed site, Aerial photo, Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (<i>Applies to permanent pits</i>) - Visual inspection (certification) of the proposed site, Aerial photo, Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area - Engineering measures incorporated into the design, NM Bureau of Geology & Mineral Resources, USGS, NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> 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 H₂S, Prevention Plan
☐ Emergency Response Plan
☐ Oil Field Waste Stream Characterization
☐ Monitoring and Inspection Plan
☐ Erosion Control Plan
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15 17.9 NMAC and 19.15 17.13 NMAC

14.

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

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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 identify 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

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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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 feet of a wetland - US Fish and Wildlife Wetland Identification map, Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within the area overlying a subsurface mine - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS, NM Geological Society, Topographic map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain - FEMA map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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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

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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 _____

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

OCD Representative Signature: _____

Approval Date: 1/09/2012Title: Compliance Officer

OCD Permit Number: _____

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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: 10/20/2011

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

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

Instructions: Please identify 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 *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

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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) Vanessa FieldsTitle EH&S CoordinatorSignature Vanessa FieldsDate 12/16/2011e-mail address vanessa.fields@williams.comTelephone 505-333-1880

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

Well: (Rosa Unit# 018B)
API No: 30-03927052
Location: N-S22-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.(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 (10/17/2011). 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 Rosa Unit#018B 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 NMOCDD 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	0.01
TPH	EPA SW-846 Method 418.1 ⁽¹⁾	100	57.8
Chlorides	EPA SW-846 Method 300.1 ⁽¹⁾	250 ⁽²⁾	20

⁽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

Fields, Vanessa

From: Fields, Vanessa
Sent: Monday, October 17, 2011 3:23 PM
To: 'brad.a.jones@state.nm.us'
Cc: 'Brandon Powell (Brandon.Powell@state.nm.us)'; Lane, Myke, Lucero, Christopher, Dean, Stanley, Lepich, Mark
Subject: Request for review of pit closure plan for the Rosa Unit#018B

Brad,

We need to take the following below grade tank out of service, and would like to close this existing BGT. We request your review to allow closure.

Well Site	API	FMT	SEC	TWN	RNG
Rosa Unit # 018B 06W	30-03927052	Mesa Verde	022N	31N	

Please contact myself or Myke Lane should you have any questions or concerns.

Vanessa Fields



EH&S Coordinator
Williams Production
Office: 505-333-1880
Fax: 505-333-1850
Cell: 505-419-6219
vanessa.fields@williams.com

Fields, Vanessa

From: Fields, Vanessa
Sent: Monday, October 17, 2011 3 23 PM
To: 'brad.a.jones@state.nm.us'
Cc: 'Brandon Powell (Brandon.Powell@state.nm.us)', Lane, Myke; Lucero, Christopher; Dean, Stanley, Lepich, Mark
Subject: Request for review of pit closure plan for the Rosa Unit#018B

Brad,

We need to take the following below grade tank out of service, and would like to close this existing BGT. We request your review to allow closure.

Well Site	API	FMT	SEC	TWN	RNG
Rosa Unit # 018B 06W	30-03927052	Mesa Verde	022N	31N	

Please contact myself or Myke Lane should you have any questions or concerns.

Vanessa Fields



EH&S Coordinator
Williams Production
Office: 505-333-1880
Fax: 505-333-1850
Cell: 505-419-6219
vanessa.fields@williams.com



Exploration & Production
FCB 640
Attn: NM 81121
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.

Respectfully 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 File

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 (WFX) locations in the San Juan Basin of New Mexico. This is WFX's standard closure procedure for all BGTs regulated under Rule 19-15-17 NMAC and operated by WFX. 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, WFX 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 scheduled as specified in 19-15-17-12 (A)(5) NMAC.
- WFX 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 (6) NMAC and WFX 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, WFX 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 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. Operator's Name (WFX)
 - 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, etc.). The well will be temporarily shut in 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 NMOC/D 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 10030 API 30-039-23035), Jillson Fed SWD #001 (Order R10168/R10168A API 30-039-25465), Middle Mesa SWD #001 (Order SWD 3500 API 30-045-27004) and/or Basin Disposal (Permit NM 01-0005).

Solids and sludges will be shoveled and/or vacuumed for disposal at Envirotech (Permit NM 01-0005).

WFX will obtain prior approval from NMOC/D to reuse or recycle materials from 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. Fuel release tanks will be emptied, cleaned or shredded and HAZ cleaned for disposal or solid waste. Other 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 19-15-17(2) 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 RCST that is no longer required for some other purpose, following the closure, will be removed from this 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(f)(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-144.

Table 1. Closure Criteria for RCSTs

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	100
Chlorides	EPA SW 846 Method 300.1	2500

(Method modified for solid waste)

If the greater of the evaluation of chlorides greater than 240 mg/kg or the highest extractable will be used for closure.

9. If the Division and/or WFX determine there is a release, WFX will comply with 19-15-17(2) NMAC and 19-15-17(9) 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 backfill of thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and prevent ponding.
11. For those portions of the former pit area no longer required for production activities, WFX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling or the contour whichever is 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 re-seeding or other surface restoration that does not meet the vegetation requirements of 19-15-17-13(f) NMAC, then WFX 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, re-seeding 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 OCE within 60 days of the RCST closure or a Closure Report using Division Form C-144. The report will include the following:

- Final RCST site location map as per NMED
- Final RCST site location map as per NMED
- Site location map as per NMED
- Approval letter from NMED
- Communication Summary from NMED
- Disposal facility name(s) and permit number(s)
- Application Form & Fee(s) to NMED
- Final documentation of RCST closure

WELLS w/FEDERAL SURF MGT	API	FMT	SEC	TWN	RNG	PIT TYPE	CONSTRUCTION MATERIAL
ROSA UNIT #012A	3003925900	BLANCO MV / ROSA PC	15J	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #012B	3003926555	BASIN DK / BLANCO MV	15F	31N	06W	BGT	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	31G	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #013A	3003926298	BLANCO MV BASIN DK /	31F	31N	05W	BGT	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 /	23F	31N	06W	BGT	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	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #016A	3003925496	BLANCO MV	14C	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #016B	3003926218	BLANCO MV	14M	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #017A	3003926272	BLANCO MV BASIN DK /	20O	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #017B	3003926971	BLANCO MV	20J	31N	05W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #018	3003907960	BLANCO MV / ROSA PC	22H	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #018A	3003925436	BLANCO MV / ROSA PC	22P	31N	06W	SGT	DBL WALL STEEL
ROSA UNIT #018B	3003927052	BLANCO MV	22O	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #019	3003907955	BLANCO MV	24K	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #019B	3003926560	BLANCO MV	24I	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #019C	3003929625	BLANCO MV	24D	31N	06W	BGT	DBL WALL STEEL
ROSA UNIT #019C	3003929625	BLANCO MV	24D	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #020	3003907969	BLANCO MV	14G	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #020A	3003925495	BLANCO MV	14O	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #020B	3003926220	BLANCO MV	14A	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #020C	3003926221	BLANCO MV	14J	31N	06W	BGT	HDPE SECONDARY LINER FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #021A	3003926121	BLANCO MV	23C	31N	06W	BGT	HDPE SECONDARY LINER
ROSA UNIT #021B	3003926554	BLANCO MV	23K	31N	06W	BGT	DBL WALL STEEL FIBERGLASS TANK w/BANDED 20 mil
ROSA UNIT #021C	3003907971	BLANCO MV	18A	31N	05W	BGT	HDPE SECONDARY LINER

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

Client:	WPX	Project #:	04108-0136
Sample ID:	Rosa #18B	Date Reported:	10-28-11
Laboratory Number:	60121	Date Sampled:	10-26-11
Chain of Custody No:	12830	Date Received:	10-26-11
Sample Matrix:	Soil	Date Extracted:	10-27-11
Preservative:	Cool	Date Analyzed:	10-27-11
Condition:	Intact	Analysis Requested:	8015 TPH

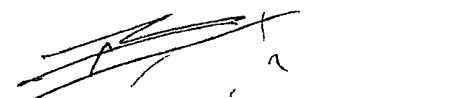
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	ND	0.1
Total Petroleum Hydrocarbons	ND	

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 #18B**


Analyst


Review



EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	10-27-11 QA/QC	Date Reported:	10-28-11
Laboratory Number:	60120	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	10-27-11
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF	C-Cal RF	% Difference	Accept Range
Gasoline Range C5 - C10	40843	9.960E+02	9.964E+02	0.04%	0 - 15%
Diesel Range C10 - C28	40843	1.002E+03	1.003E+03	0.04%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	2.3	0.2
Diesel Range C10 - C28	3.0	0.1

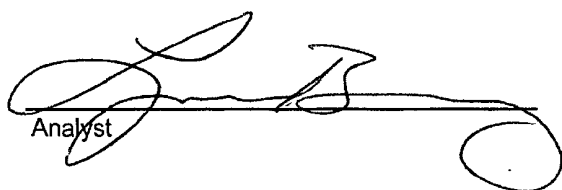
Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Range
Gasoline Range C5 - C10	ND	ND	0.00%	0 - 30%
Diesel Range C10 - C28	32.2	36.3	12.8%	0 - 30%

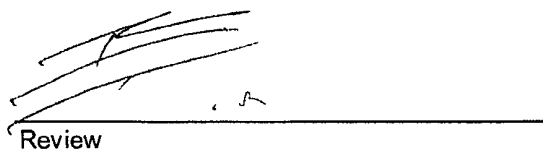
Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
Gasoline Range C5 - C10	ND	250	252	101%	75 - 125%
Diesel Range C10 - C28	32.2	250	279	98.8%	75 - 125%

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 60092-60093, 60120 and 60121


Analyst


Review

Client:	WPX	Project #:	04108-0136
Sample ID:	Rosa # 18B	Date Reported:	11-01-11
Laboratory Number:	60121	Date Sampled:	10-26-11
Chain of Custody:	12830	Date Received:	10-26-11
Sample Matrix:	Soil	Date Analyzed:	10-31-11
Preservative:	Cool	Date Extracted:	10-27-11
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	0.9
Toluene	ND	1.0
Ethylbenzene	ND	1.0
p,m-Xylene	8.8	1.2
o-Xylene	5.0	0.9
Total BTEX	13.8	

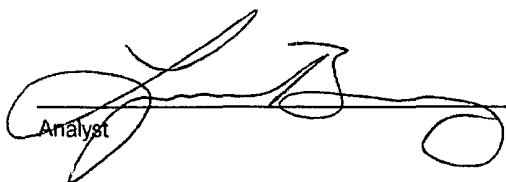
ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	83.2 %
	1,4-difluorobenzene	94.1 %
	Bromochlorobenzene	92.1 %

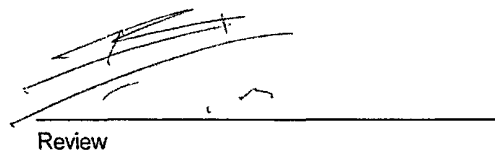
References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Rosa #18B



 Analyst



 Review

Client:	N/A	Project #:	N/A
Sample ID:	1031BBLK QA/QC	Date Reported:	10-31-11
Laboratory Number:	60128	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	10-31-11
Condition:	N/A	Analysis:	BTEX
		Dilution:	10

Calibration and Detection Limits (ug/L)	I-Cal RF	C-Cal RF	%Diff	Blank Conc	Detect Limit
		Accept Range 0 - 15%			
Benzene	2.5564E+006	2.5615E+006	0.2%	ND	0.1
Toluene	2.8320E+006	2.8377E+006	0.2%	ND	0.1
Ethylbenzene	2.6270E+006	2.6323E+006	0.2%	ND	0.1
p,m-Xylene	7.3736E+006	7.3884E+006	0.2%	ND	0.1
o-Xylene	2.4775E+006	2.4825E+006	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff	Accept Range	Detect Limit
Benzene	71.0	69.5	2.1%	0 - 30%	0.9
Toluene	322	300	6.8%	0 - 30%	1.0
Ethylbenzene	1,460	1,380	5.5%	0 - 30%	1.0
p,m-Xylene	15,000	14,900	0.7%	0 - 30%	1.2
o-Xylene	4,480	4,520	0.9%	0 - 30%	0.9

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	71.0	500	607	106%	39 - 150
Toluene	322	500	859	105%	46 - 148
Ethylbenzene	1,460	500	1,940	99.0%	32 - 160
p,m-Xylene	15,000	1000	15,600	97.5%	46 - 148
o-Xylene	4,480	500	4,980	100%	46 - 148

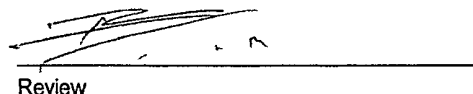
ND - Parameter not detected at the stated detection limit.

Dilution: Spike and spiked sample concentration represent a dilution proportional to sample dilution.

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 60121, 60128, 60134-60136, 60147, 60149 and 60150.

Analyst 

Review 

Client:	WPX	Project #:	04108-0136
Sample ID:	Rosa # 18B	Date Reported:	10/28/11
Laboratory Number:	60121	Date Sampled:	10/26/11
Chain of Custody No:	12830	Date Received:	10/26/11
Sample Matrix:	Soil	Date Extracted:	10/27/11
Preservative:	Cool	Date Analyzed:	10/27/11
Condition:	Intact	Analysis Needed:	TPH-418.1

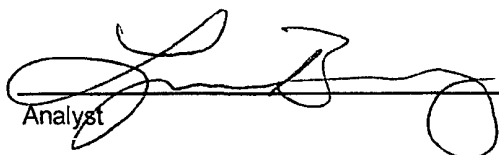
Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
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Total Petroleum Hydrocarbons	57.8	7.2
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ND = Parameter not detected at the stated detection limit.

References: Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water and Waste, USEPA Storet No. 4551, 1978.

Comments: **Rosa #18B**


Analyst
Review



**EPA METHOD 418.1
TOTAL PETROLEUM HYDROCARBONS
QUALITY ASSURANCE REPORT**

Client:	QA/QC	Project #:	N/A
Sample ID:	QA/QC	Date Reported:	10/27/11
Laboratory Number:	10-27-TPH.QA/QC 60121	Date Sampled:	N/A
Sample Matrix:	Freon-113	Date Analyzed:	10/27/11
Preservative:	N/A	Date Extracted:	10/27/11
Condition:	N/A	Analysis Needed:	TPH

Calibration	I-Cal Date	C-Cal Date	I-Cal RF	C-Cal RF	% Difference	Accept Range
	10/18/2011	10/27/11	1,810	1,720	5.0%	+/- 10%

Blank Conc. (mg/Kg)	Concentration	Detection Limit
TPH	ND	7.2

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept Range
TPH	57.8	57.8	0.00%	+/- 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
TPH	57.8	2,000	1,850	89.9%	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 60121**


Analyst


Review

Client:	WPX	Project #:	04108-0136
Sample ID:	Rosa #18B	Date Reported:	10/28/11
Lab ID#:	60121	Date Sampled:	10/26/11
Sample Matrix:	Soil	Date Received:	10/26/11
Preservative:	Cool	Date Analyzed:	10/27/11
Condition:	Intact	Chain of Custody:	12830


Parameter	Concentration (mg/Kg)
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Total Chloride**20**

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.

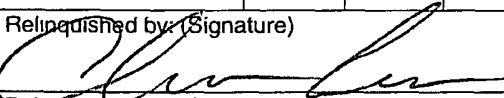
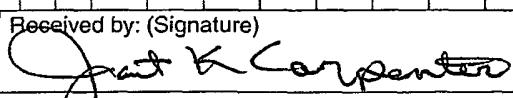
Comments: **Rosa #18B**


Analyst


Review

CHAIN OF CUSTODY RECORD

12830

Client: WPX			Project Name / Location: Risa #18B			ANALYSIS / PARAMETERS															
Client Address: Myer Lane			Sampler Name: Chris Lucero			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	
Client Phone No.: 330-3158			Client No.: 04108-0136																		
Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No / Volume of Containers	Preservative HgCl ₂ HCl															
Risa #18B	10/26	11:00	60121	Soil Solid	(40%)				X	X								X	X	Y	Y
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
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envirotech
Analytical Laboratory

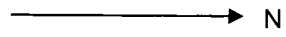
5796 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • lab@envirotech-inc.com



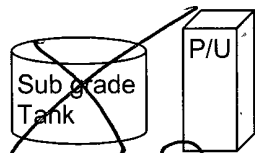
see Unit # ~~0004~~ 018B

ROSA 18B

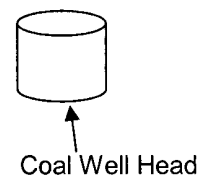
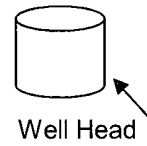
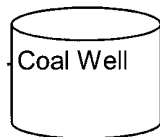
9/23/2005



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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.

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 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 19.15.17.11.1(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 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.
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. 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.

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 Williams determine there is a release, Williams will comply with 19.15.3.11.6 NMAC and 19.15.1.19 NMAC.
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.
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 do not meet the revegetation requirements of 19.15.17.13, then WPX will submit the proposed alternative with written documentation that the landowner 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)
- Re-vegetation Application Rate & Seeding techniques
- Photo Documentation of Reclamation

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, LLC	Contact	Vanessa Fields
Address	P.O. BOX 640, AZTEC, NM 87410	Telephone No.	(505) 333-1880
Facility Name	Rosa Unit #018B	Facility Type	Well Site

Surface Owner	Federal	Mineral Owner		Lease No.	
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	22	31N	06W					

Latitude 36.880279 Longitude -107.447779

NATURE OF RELEASE

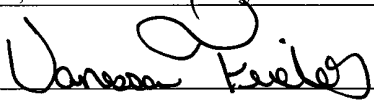
Type of Release	No Release Detected	Volume of Release	NA	Volume Recovered	NA
Source of Release		Date and Hour of Occurrence		Date and Hour of Discovery	NA
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	NA		
By Whom?		Date and Hour			
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse	NA		

If a Watercourse was Impacted, Describe Fully *
NA

Describe Cause of Problem and Remedial Action Taken *
NA

Describe Area Affected and Cleanup Action Taken.*
NA

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: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name Vanessa Fields		Approved by District Supervisor:	
Title EH&S Coordinator		Approval Date	Expiration Date
E-mail Address. Vanessa.fields@williams.com		Conditions of Approval	
Date 12-16-2011 Phone (505) 333-1880		Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary

04-67

Date	WellName	Run	Formation	Construction	SGT. BGT, Above	Liner	Leak detection		Pit	Comments / Repairs needed
						Banded Plastic liner, Double Wall Steel, Bottom Plastic Liner	Y/N	level	level	
9/3/2008	ROSA UNIT #018B	04-67	Mesa Verde	STEEL	Above	None	No		2'-8"	
30-Sep	ROSA UNIT #018B	04-67	Mesa Verde	STEEL	SGT	None	No		3'-0"	
5/29/2009	Rosa Unit #18B	04-67	Mesa Verde	STEEL	BGT	NO	NO		21	
7/30/2009	Rosa Unit #18B	04-67	Mesa Verde	STEEL	BGT	NO	NO		15	
8/26/2009	Rosa Unit #18B	04-67	Mesa Verde	STEEL	BGT	NO	NO		17	
9/1/2009	Rosa Unit #18B	04-67	Mesa Verde	STEEL	BGT	NO	NO	17	0	
10/1/2009	Rosa Unit #18B	04-67	Mesa Verde	STEEL	BGT	NO	NO		17	
11/30/2009	Rosa Unit #18B	04-67	Mesa Verde	STEEL	BGT	NO	NO		17	
12/16/2009	Rosa Unit #018B	04-67	Mesa Verde	STEEL	BGT	NO	NO		18	
1/1/2010	Rosa Unit #018b	04-67	Mesa Verde	STEEL	BGT	NO	NO		19	
2/12/2010	Rosa Unit #018b	04-67	Mesa Verde	STEEL	BGT	NO	NO		19	
3/10/2010	Rosa Unit #018B	04-67	Mesa Verde	STEEL	BGT	NO	NO		19	