

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

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

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.

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

11066

- 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 Four Corners, LLC OGRID #: \_\_\_\_\_  
Address: 188 County Road 4900, Bloomfield, NM 87413  
Facility or well name: NEBU 3A  
API Number: 30-045-23088 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr E Section 5 Township 30 N Range 7 W County Rio Arriba  
Center of Proposed Design: Latitude 36.844236 Longitude -107.599942 NAD:  1927  1983  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

2.  
 **Pit:** Subsection F or G of 19.15.17.11 NMAC  
Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
 String-Reinforced  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

RCVD MAR 11 '13  
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: 30 bbl Type of fluid: Produced Water – dehydrator or other produced fluids (RCRA exempt)  
Tank Construction Material 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 Double Bottom and Visible Sidewalls  
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.

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 19.15.16.8 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	<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. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - 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. (Applies to permanent pits) - 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 H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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	<input type="checkbox"/> Yes <input 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 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 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 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 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 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

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: 4/25/2013  
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: 1/24/2013

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: \_\_\_\_\_ 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 Not applicable (no impacted soil removed from location)
- 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): Matthew Webre Title: Environmental Specialist  
Signature: [Signature] Date: 3/6/2013  
e-mail address: matt.webre@williams.com Telephone: (505) 632-4442

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

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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company Williams Four Corners, LLC	Contact Matt Webre
Address 188 CR 4900, Bloomfield, NM 87413	Telephone No. 505-632-4442
Facility Name NEBU 3A	Facility Type Below Grade Tank Removal
Surface Owner Bureau of Reclamation	Mineral Owner
API No. 30-045-23088	

**LOCATION OF RELEASE**

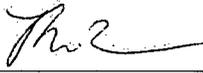
Unit Letter E	Section 5	Township 30N	Range 7W	Feet from the	North/South Line	Feet from the	East/West Line	County Rio Arriba
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Latitude 36.844236 N Longitude 107.599942 W

**NATURE OF RELEASE**

Type of Release N/A – Below Grade Tank Removal	Volume of Release 0	Volume Recovered 0
Source of Release Above Grade Tank	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.* N/A – Below grade tank removal.		
Describe Area Affected and Cleanup Action Taken.*		

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: 	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Matt Webre	Approved by Environmental Specialist:	
Title: Environmental Specialist	Approval Date:	Expiration Date:
E-mail Address: matt.webre@williams.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 3/5/2013	Phone: 505-632-4442	

\* Attach Additional Sheets If Necessary



Williams Four Corners, LLC  
Below Grade Tank Closure Report  
Well Name: NEBU 3A  
API Number: 30-045-23088

The following provides information related to the retirement and closure of the below grade tank (BGT) at the named location. All work was performed in accordance with Rule 19.15.17.13 NMAC and was consistent with the Williams BGT Closure Plan approved by NMOCD.

**Requirement:** Provide notices to NMOCD and landowner prior to closure actions.

Action: Notification made to landowner by mail and to NMOCD Aztec District Office by either mail (included with C-144) or by email.

**Requirement:** Eliminate discharge to BGT and remove free-standing liquids from BGT and or containment.

Action: Discharge to the BGT was eliminated and liquids, when present, were removed by a licensed hauler and taken to a NMOCD-permitted facility listed in the aforementioned closure plan.

**Requirement:** Remove ancillary equipment including piping, liner material, and fencing.

Action: Piping, liner material, and fencing were removed in advance or at the time of BGT retirement work. Scrap steel was recycled or placed in a Williams-owned storage area to allow evaluation for final disposition.

**Requirement:** Sample and test soils beneath the BGT to determine if there was hydrocarbon impact.

Action: Soils were sampled and analyzed for TPH, BTEX and chlorides. Results are attached to the C-144 Closure Form and are part of the closure documentation.

**Requirement:** Address contamination consistent with the Closure Plan or Remedial Action Plan/Protocol.

Action: Limited contaminated soil was encountered during the BGT, therefore removal was not required.

**Requirement:** Backfill containment/excavation with acceptably clean materials and return area to grade such that ponding and erosion are mitigated.

Action: Clean soil (as defined) was used to return the BGT area to grade and was contoured/leveled consistent with the Pit Rule criteria.

**Requirement:** Reclaim and re-seed the area consistent with the Pit Rule and Closure Plan criteria.

Action: This requirement was not completed as the BGT was located on an active well pad. As stated in the approved plan, this requirement is deferred pending further well production and/or subsequent actions of the leaseholder and will be addressed when the well site is reclaimed.

*Any additional work performed and not described herein was completed consistent with the BGT Closure Plan and/or applicable NMOCD requirements. Further information is provided in the C-144 Closure Form as specified in the Pit Rule.*

**Webre, Matt**

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**From:** Webre, Matt  
**Sent:** Friday, February 01, 2013 7:48 AM  
**To:** 'Powell, Brandon, EMNRD'  
**Cc:** Ruybalid, Tristen  
**Subject:** Notice of BGT Removal - NEBU 3A

Pursuant to the requirements of the New Mexico Oil Conservation District (OCD), Williams hereby provides notice of the intent to remove the BGT at the following location:

NEBU 3A    API No. 30-045-23088    Unit E, Section 5, Township 30N, Range 7W

The closure plan was approved by OCD on September 26, 2012. BGT closure is schedule to begin the week of February 4, 2013.

Please contact me if you have any questions regarding the proposed BGT removal and/or schedule.

Matt Webre, P.G.  
Environmental Specialist III  
Williams Four Corners, LLC  
(505) 632-4442 work  
(505) 215-8059 cell  
(505) 632-4781 fax  
[matt.webre@williams.com](mailto:matt.webre@williams.com)



Environmental Affairs  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4600  
505/632-4781 Fax

February 1, 2013

Mike Dombrowski  
Bureau of Reclamation  
Western Colorado Area Office – Four Corners Division  
185 Suttle Street, Suite 2  
Durango, Colorado 81303

RE: Notification of Below Ground Tank Closure – NEBU 3A

Dear Mr. Dombroski:

Pursuant to the requirements of the New Mexico Oil Conservation District (OCD), Williams hereby provides notice for the removal of a BGT at the following location:

NEBU 3A API No. 3004523088 Unit E, Section 5, Township 30N, Range 7W

The closure plan was approved by OCD on September 26, 2012. BGT closure is scheduled to begin the week of February 4, 2013.

You may contact me at (505) 632-4442 with any questions regarding this notification.

Sincerely,

Matt Webre, P.G.  
Environmental Specialist

I DO HEREBY CERTIFY that this document was sent by CERTIFIED MAIL to the named recipient at the address above on February 1st, 2013. By Kayleigh Puybalid

Certified mail # 7011 3500 0000 7065 0935

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Signature <span style="float: right;"><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</span> <b>X</b>	
1. Article Addressed to:  Mike Dombrowski Bureau of Reclamation western Colorado Area office Four Corners Division 185 Suttle Street, Suite 2 Durango, CO 81303	B. Received by (Printed Name)	C. Date of Delivery
2. Article Number (Transfer from service label)	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
	7011 3500 0000 7665 6935	
PS Form 3811, February 2004	Domestic Return Receipt	102595-02-M-1540

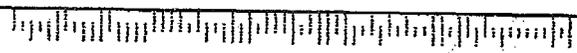
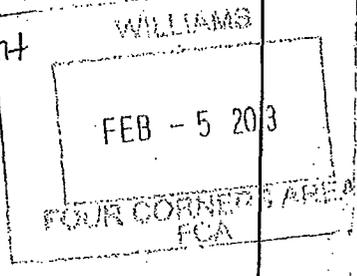
UNITED STATES POSTAL SERVICE



First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Williams Four Corners, LLC  
 Attn: Environmental Department  
 188 County Road 4900  
 Bloomfield, NM 87413





# envirotech

Analytical Laboratory

## Report Summary

Client: WFS

Chain of Custody Number: 15038

Samples Received: 01-02-13

Job Number: 00068-0146

Sample Number(s): 64032

Project Name/Location: NEBU #3A 5 Point Comp.

Entire Report Reviewed By: \_\_\_\_\_

Date: \_\_\_\_\_

1/8/13

The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.



EPA METHOD 8021  
AROMATIC VOLATILE ORGANICS

Client:	WFS	Project #:	00068-0146
Sample ID:	NEBU #3A 001	Date Reported:	01-07-13
Laboratory Number:	64032	Date Sampled:	01-02-13
Chain of Custody:	15038	Date Received:	01-02-13
Sample Matrix:	Soil	Date Analyzed:	01-04-13
Preservative:	Cool	Date Extracted:	01-03-13
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	50

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	10.0
Toluene	ND	10.0
Ethylbenzene	ND	10.0
p,m-Xylene	ND	10.0
o-Xylene	ND	10.0
Total BTEX	ND	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	89.5 %
	1,4-difluorobenzene	91.2 %
	Bromochlorobenzene	82.4 %

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: NEBU #3A 5 Point Comp.



EPA METHOD 8021  
AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	0104BCA2 QA/QC	Date Reported:	01-07-13
Laboratory Number:	64040	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	01-04-13
Condition:	N/A	Analysis:	BTEX
		Dilution:	50

Calibration and Detection Limits (ug/L)	I-Cal RF	C-Cal RF	%Diff	Blank Conc	Detect Limit
	Accept. Range 0-15%				
Benzene	3.5742E-06	3.5742E-06	0.000	ND	0.2
Toluene	1.7882E-06	1.7882E-06	0.000	ND	0.2
Ethylbenzene	2.4248E-06	2.4248E-06	0.000	ND	0.2
p,m-Xylene	2.1955E-06	2.1955E-06	0.000	ND	0.2
o-Xylene	2.4522E-06	2.4522E-06	0.000	ND	0.2

Duplicate Conc: (ug/Kg)	Sample	Duplicate	%Diff	Accept Range	Detect Limit
Benzene	ND	ND	0.00	0 - 30%	10
Toluene	ND	ND	0.00	0 - 30%	10
Ethylbenzene	ND	ND	0.00	0 - 30%	10
p,m-Xylene	ND	ND	0.00	0 - 30%	10
o-Xylene	ND	ND	0.00	0 - 30%	10

Spike Conc: (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	2500	2130	85.2	39 - 150
Toluene	ND	2500	2460	98.4	46 - 148
Ethylbenzene	ND	2500	2200	88.0	32 - 160
p,m-Xylene	ND	5000	4450	89.0	46 - 148
o-Xylene	ND	2500	2100	84.0	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 64032-64033 and 64040



**envirotech**  
Analytical Laboratory

**EPA METHOD 418.1  
TOTAL PETROLEUM HYDROCARBONS**

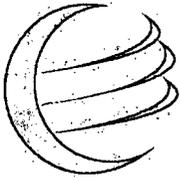
Client:	WFS	Project #:	00068-0146
Sample ID:	NEBU #3A 001	Date Reported:	01-07-13
Laboratory Number:	64032	Date Sampled:	01-02-13
Chain of Custody No:	15038	Date Received:	01-02-13
Sample Matrix:	Soil	Date Extracted:	01-03-13
Preservative:	Cool	Date Analyzed:	01-03-13
Condition:	Intact	Analysis Needed:	TPH-418.1

Parameter	Concentration (mg/kg)	Det. Limit (mg/kg)
<b>Total Petroleum Hydrocarbons</b>	<b>22.9</b>	<b>13.4</b>

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: **NEBU #3A 001 5 Point Comp.**



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Analytical Laboratory

EPA METHOD 418.1  
TOTAL PETROLEUM HYDROCARBONS  
QUALITY ASSURANCE REPORT

Client:	QA/QC	Project #:	N/A
Sample ID:	QA/QC	Date Reported:	01-03-13
Laboratory Number:	01-03-TPH:QA/QC 64029	Date Sampled:	N/A
Sample Matrix:	Freon-113	Date Analyzed:	01-03-13
Preservative:	N/A	Date Extracted:	01-03-13
Condition:	N/A	Analysis Needed:	TPH

Calibration	I-Cal Date	C-Cal Date	I-Cal RF	C-Cal RF	% Difference	Accept Range
	11-15-12	01-03-13	1,680	1,720	2.4%	+/- 10%

Blank Conc. (mg/Kg)	Concentration	Detection Limit
TPH	ND	13.4

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept Range
TPH	20.2	25.8	28%	+/- 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
TPH	20.2	2,000	1,770	87.6%	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 64029, 64032.



# envirotech

Analytical Laboratory

## Chloride

Client:	WFS	Project #:	00068-0146
Sample ID:	NEBU #3A 001	Date Reported:	01-07-13
Lab ID#:	64032	Date Sampled:	01-02-13
Sample Matrix:	Soil	Date Received:	01-02-13
Preservative:	Cool	Date Analyzed:	01-04-13
Condition:	Intact	Chain of Custody:	15038

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

**18.2**

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: **NEBU #3A 5 Point Comp.**

# CHAIN OF CUSTODY RECORD

15038

Client: <i>WFS</i>	Project Name / Location: <i>5 Point NE BU #3A comp.</i>	ANALYSIS / PARAMETERS															
Email results to: <i>math.weber@williams.com</i>	Sampler Name: <i>Morgan Killion</i>	TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE					Sample Cool	Sample Intact
Client Phone No.:	Client No.:																

Sample No./ Identification	Sample Date	Sample Time	Lab No.	No./Volume of Containers	Preservative			TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE					Sample Cool	Sample Intact	
					HgCl <sub>2</sub>	HCl																		
<i>NEBU#3A 001</i>	<i>1-2-13</i>	<i>09:40</i>	<i>1301002-01 04032</i>	<i>1-402</i>				<i>X</i>								<i>X</i>	<i>X</i>						<i>XX</i>	<i>XX</i>

Relinquished by: (Signature) <i>Morgan Killion</i>	Date <i>1-2-13</i>	Time <i>11:26</i>	Received by: (Signature) <i>William Joe</i>	Date <i>1/02/13</i>	Time <i>11:26</i>
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Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
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Sample Matrix:  
 Soil  Solid  Sludge  Aqueous  Other

Sample(s) dropped off after hours to secure drop off area.



5795 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • Three Springs • 65 Mercado Street, Suite 115, Durango, CO 81301 • laboratory@envirotech-inc.com





Environmental Affairs  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4600  
505/632-4781 Fax

April 24, 2013

Mr. Jonathan Kelly  
New Mexico Oil Conservation Division  
1000 Rio Brazos  
Aztec, NM 87410

**OIL CONS. DIV DIST. 3**

**APR 24 2013**

RE: Corrective Action Plan for Below-Grade Tank Removal

Dear Mr. Kelly:

In response to your verbal request regarding the improper agency notification by Williams Four Corners LLC (WFC) for the removal of a below-grade tank (BGT) at the NEBU 3A, the attached corrective action plan was prepared to ensure that proper notifications are provided to the New Mexico Oil and Gas Conservation Division (NMOCD) prior to BGT removal.

The removal of the BGT at NEBU 3A (API No. 30-045-23088) was initiated in early January 2013 and completed on January 24, 2013. The notification of BGT removal was submitted to the NMOCD on February 1, 2013 after the BGT was removed. It was determined that miscommunication between the WFC Environmental Specialist and the Coordinator of Maintenance was the cause of the delayed notification to the NMOCD. To ensure this issue does not happen again, WFC has implemented an internal notification and action process for personnel to follow during BGT removals. The process is documented on the attached BGT Removal Flowchart form.

If you have any comments or questions regarding this corrective action plan, please contact me at 505-632-4442.

Sincerely,

Matt Webre, P.G.  
Environmental Specialist

Attachment

CC: Mark Potochnik (WFC)  
Lloyd Bell (WFC)  
Barbara Jackson (WFC)  
Dwayne Valdez (WFC)

## BELOW-GRADE TANK REMOVAL FLOWCHART (NEW MEXICO ONLY)

<b>Location ID</b>	
<b>Section, Township, Range</b>	
<b>Land Owner</b>	

Operations (GREY) and the Environmental Specialist (GREEN) shall complete the following tasks in the sequential order as listed below. This process is only required for below-grade tanks (BGTs) located in New Mexico

<b>Description of Required Tasks in Sequential Order</b>	<b>Completion Date</b>
1. Operations shall notify Environmental Specialist and ROW of BGT proposed for removal (via MOC)	
↓	
2. Environmental Specialist prepare/submit BGT Closure Plan	
↓	
3. NMOCD approves closure plan (approve time is typically 1 to 2 weeks)	
↓	
4. Environmental Specialist provides notification to Operations that NMOCD has approved BGT Closure Plan	
↓	
5. Operations provides Environmental Specialist with the planned BGT removal schedule (must be a minimum of 72 hours (prior)	
↓	
6. Environmental Specialist provides notification (>72 hours and <7 days) to NMOCD and Landowner	
↓	
7. Operations removes BGT from location, collects samples, and backfills upon approval from Environmental Specialist	
↓	
8. Environmental Specialist submits BGT Closure Report within 60 days of completion of backfill operations	