

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

Form C-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or

13968 Proposed Alternative Method Permit or Closure Plan Application

Type of action: Below grade tank registration
 Permit of a pit or proposed alternative method
45-23294 Closure of a pit, below-grade tank, or proposed alternative method
 Modification to an existing permit/or registration
 Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

OIL CONS. DIV DIST. 3

JAN 20 2016

Instructions: Please submit one application (Form C-144) per individual pit, 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: Helen Jackson 2A
API Number: 30-045-23294 OCD Permit Number: _____
U/L or Qtr/Qtr SW/4 SE/4 Section 33 Township 29N Range 9W County: San Juan
Center of Proposed Design: Latitude 36.677695 Longitude -107.785079 NAD: 1927 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2. Pit: Subsection F, G or J of 19.15.17.11 NMAC
Temporary: Drilling Workover
 Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid yes no
 Lined Unlined Liner type: Thickness _____ mil LLDPE HDPE PVC Other _____
 String-Reinforced
Liner Seams: Welded Factory Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

3. Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume: 30 bbl Type of fluid: Produced water
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 _____
Liner type: Thickness 6 mil HDPE PVC Other _____

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

5. **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 4 foot Hog Wire

21

6.

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)

7.

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

8.

Variations 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:

- Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
- Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

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. Siting criteria does not apply to drying pads or above-grade tanks.*

General siting

Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

- Yes No
- NA

Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.

- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

- Yes No
- NA

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. **(Does not apply to below grade tanks)**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

- Yes No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

- Yes No

Within an unstable area. **(Does not apply to below grade tanks)**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

- Yes No

Within a 100-year floodplain. **(Does not apply to below grade tanks)**

- FEMA map

- Yes No

Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

- Yes No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

- Yes No

Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

- Yes No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

- Yes No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

- Yes No

<p>Within 100 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><u>Temporary Pit Non-low chloride drilling fluid</u></p>	
<p>Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).</p> <ul style="list-style-type: none"> - Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;</p> <ul style="list-style-type: none"> - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><u>Permanent Pit or Multi-Well Fluid Management Pit</u></p>	
<p>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).</p> <ul style="list-style-type: none"> - Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.</p> <ul style="list-style-type: none"> - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No

10.

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: _____

11.

Multi-Well Fluid Management Pit 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.

- 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
- A List of wells with approved application for permit to drill associated with the pit.
- 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
- Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

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

12. **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

13. **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 Multi-well Fluid Management Pit
 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

14. **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 C 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 H of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15. **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 require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 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 25-50 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 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 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, 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 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, 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
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 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 incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	<input type="checkbox"/> Yes <input type="checkbox"/> No

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 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

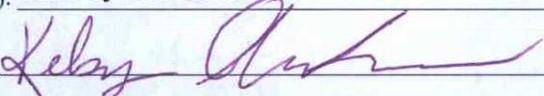
16. **On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- 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 E of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K 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 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements 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 H of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17. **Operator Application Certification:**

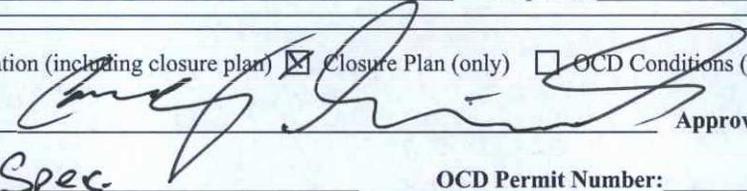
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Kelsey Christiansen Title: Environmental Specialist

Signature:  Date: 1/19/2016

e-mail address: kelsey.christiansen@williams.com Telephone: 505-632-4606

18. **OCD Approval:** Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 2/11/16

Title: Environmental Spec OCD Permit Number: _____

19. **Closure Report (required within 60 days of closure completion):** 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: _____

20. **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.

21. **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 for private land only)
- 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

22.

Operator Closure Certification:

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

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

OIL CONS. DIV DIST. 3

JAN 20 2016



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

[US Mail]

January 19, 2016

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

Re: Below-Grade Tank Closure Plan – Helen Jackson 2A, San Juan County, New Mexico

Dear Mr. Smith

Attached is a C-144 Below-Grade Tank (BGT) Closure Plan for a below-grade tank (BGT) operated by Williams Four Corners LLC (Williams). The tank is a 30 BBL field tank located at the Helen Jackson 2A wellsite.

Williams request that you email a copy of the approved BGT closure plan to kelsey.christiansen@williams.com for our records.

Please contact me at (505) 632-4606 with any questions regarding this closure plan.

Sincerely,

A handwritten signature in cursive script that reads "Kelsey Christiansen".

Kelsey Christiansen
Environmental Specialist

Attachments: Form C-144
Siting Criteria
Closure Plan – Below Grade Tanks

**SITING CRITERIA
SUMMARY INFORMATION SHEET
19.15.17.10 NMAC**



LT Environmental Inc.
2243 Main Avenue, Suite 3
Durango, Colorado 81301
T 970-385-1096

GENERAL INFORMATION

Site Name: Helen Jackson 2A
Pit Type: Below Grade Tank

Operator: Williams Four Corners LLC
Date: 12/23/2015
Prepared by: LT Environmental

GENERAL SITE LOCATION INFORMATION

Geologic Formation: Nacimiento Formation
Soil Type: Persayo-Farb-Blancot-Badland
Annual Precipitation: 9.79 inches

SEC: 33 **TWN:** 29N **RNG:** 9W
Latitude: 36.677695 **Longitude:** -107.7850

GENERAL SITING CRITERIA

Is groundwater less than 25 feet below the bottom of below grade tank? Greater than 100 feet
See Figure 3 and attached iWaters Data

BELOW GRADE TANK SITING CRITERIA

Within 100 feet of a continuously flowing watercourse? NO See Figure 1

The San Juan River is located approximately 3.35 miles north of the site.

Within 100 feet of a significant watercourse? NO See Figure 1 and Figure 3

Largo Canyon is located approximately 1.42 miles west of the site.

Within 100 feet of a lakebed, playa lake, or sinkhole? NO See Figure 2

There are no lakebeds, playa lake, or sinkholes in the area.

Within 200 horizontal feet of a spring or a freshwater well used for public or livestock consumption? NO See Figure 3 and attached iWaters data

Water well SJ 03746 with iWaters data is located approximately 13,000 feet southeast of the site.

ATTACHED DOCUMENTS:

- Hydrogeologic Report
- Figure 1: Topographic Map
- Figure 2: Aerial Photograph
- Figure 3: Water Well and Surface Water Features
- iWaters Data

ADDITIONAL COMMENTS:



Helen Jackson #2A Hydrogeologic Report for Siting Criteria

General Geology and Hydrology

The proposed below ground tank is located on the Nacimiento Formation near a second-order tributary of Largo Wash within the Largo Canyon drainage system of the San Juan Basin. Thickness of the Nacimiento Formation in the San Juan Basin ranges from 418 feet to 2,232 feet. Local aquifers include sandstones occurring from 0 feet to 1,000 feet below ground surface (bgs), as well as shallow aquifers within Quaternary alluvial deposits (Stone et al., 1983). Groundwater within these aquifers flows toward the nearby San Juan River and its tributaries.

The prominent soil type at the below-grade grade tank is aridisols, which are defined as soils that do not show any profile development. Miles of arroyos, washes, and intermittent streams exist as part of the drainage network toward the San Juan River and sudden influx of water from storm events easily erodes soils that cover the area. Dry and arid weather further prohibit active recharge. The climate of the region is arid, averaging approximately 9.79 inches of rainfall annually. As is typical of the southwestern United States monsoonal weather patterns, most precipitation falls from August through October. However, significant recharge occurs during the winter months during snowmelt periods from the upper elevations (Western Regional Climate Center www.wrcc.dri.edu). Vegetation consists of predominantly sagebrush and grasses with a more restricted pinon-juniper association (Dick-Peddie, 1993).

Site-Specific Hydrogeology

The proposed below-grade tank is located in a region incised by washes, gullies, and arroyos, with Largo Canyon being the predominant topographic feature. Groundwater data are sparse in this region; the nearest permitted water well, SJ 03746, is approximately 13,000 feet to the southeast in Kutz Wash. Depth to groundwater in the permitted water well is listed as 40 feet bgs as shown on the attached results from a search of the New Mexico State Engineer's iWaters database. Because the water well is located in a separate drainage basin, the depth to water in the well is not considered indicative of the depth to groundwater beneath the site. Rather, the elevation difference between the proposed site and Largo Canyon is used to estimate depth to groundwater. Elevation at the site is approximately 5,913 feet above mean sea level (amsl) and the elevation of Largo Wash just downstream of the proposed site is 5,632 feet amsl. As such, groundwater beneath the proposed below-grade tank is estimated to be greater than 100 feet bgs.

References

- Dick-Peddie, W.A., 1993, *New Mexico Vegetation – Past, Present and Future*: Albuquerque, New Mexico, University of New Mexico Press, 244 p.
- Stone, W.J., F.P. Lyford, P.F. Frenzel, N.H. Mizell, and E.T. Padgett, 1983, *Hydrogeology and Water Resources of the San Juan Basin, New Mexico*: HR-6 New Mexico Bureau of Geology and Mineral Resources Hydrology Report 6.
- Western Region Climate Center, 2008, New Mexico climate summaries: Desert Research Institute at <http://www.wrcc.dri.edu/summary/climsnm.html>.

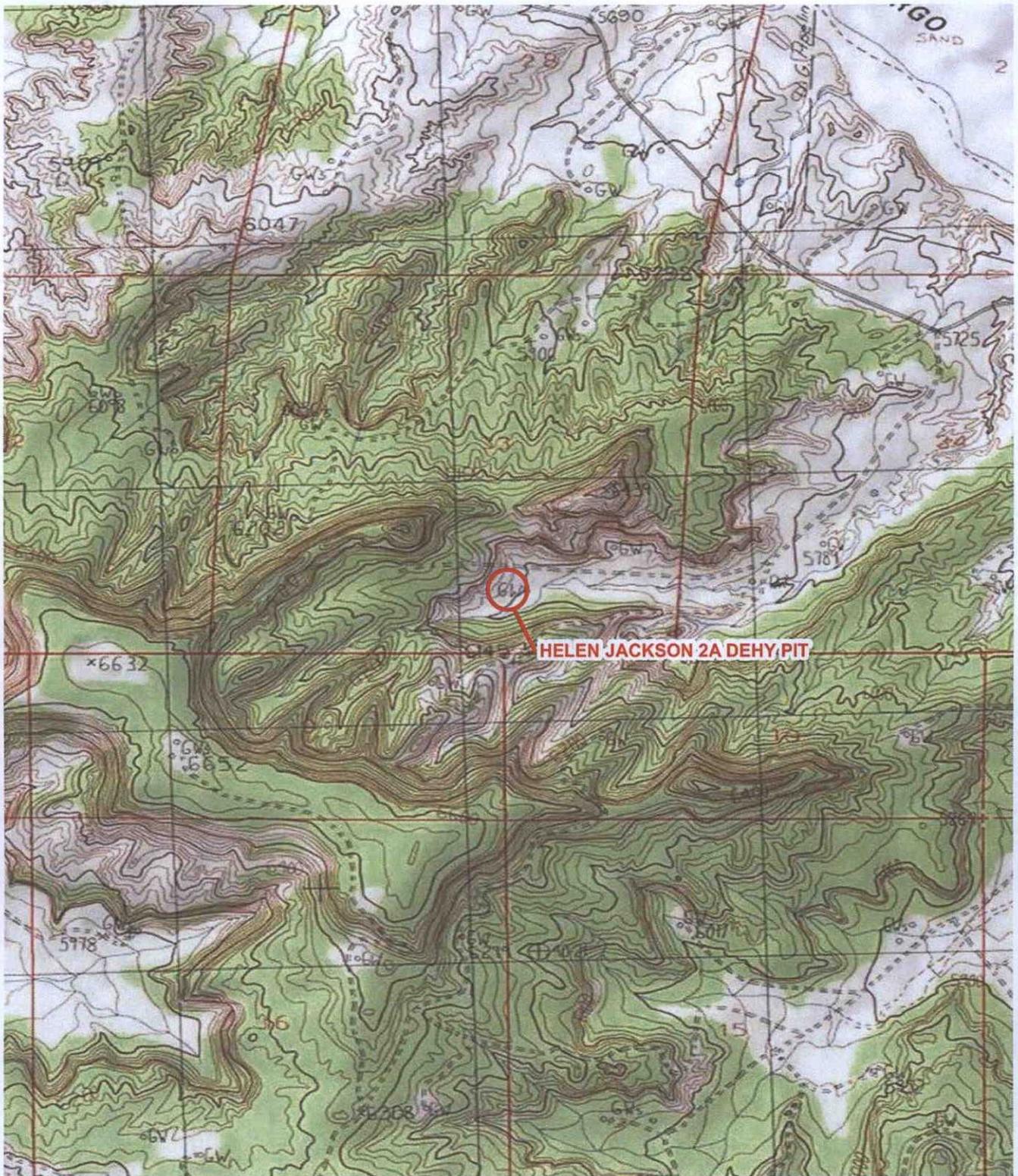


IMAGE COURTESY OF ESRI/USGS

LEGEND

 SITE LOCATION

BGT: BELOW GRADE TANK

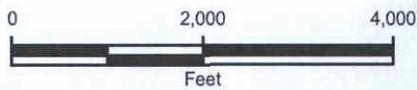


FIGURE 1
TOPOGRAPHIC MAP
HELEN JACKSON 2A DEHY PIT
SWSE SEC 33 T29N R9W
SAN JUAN COUNTY, NEW MEXICO
WILLIAMS FOUR CORNERS



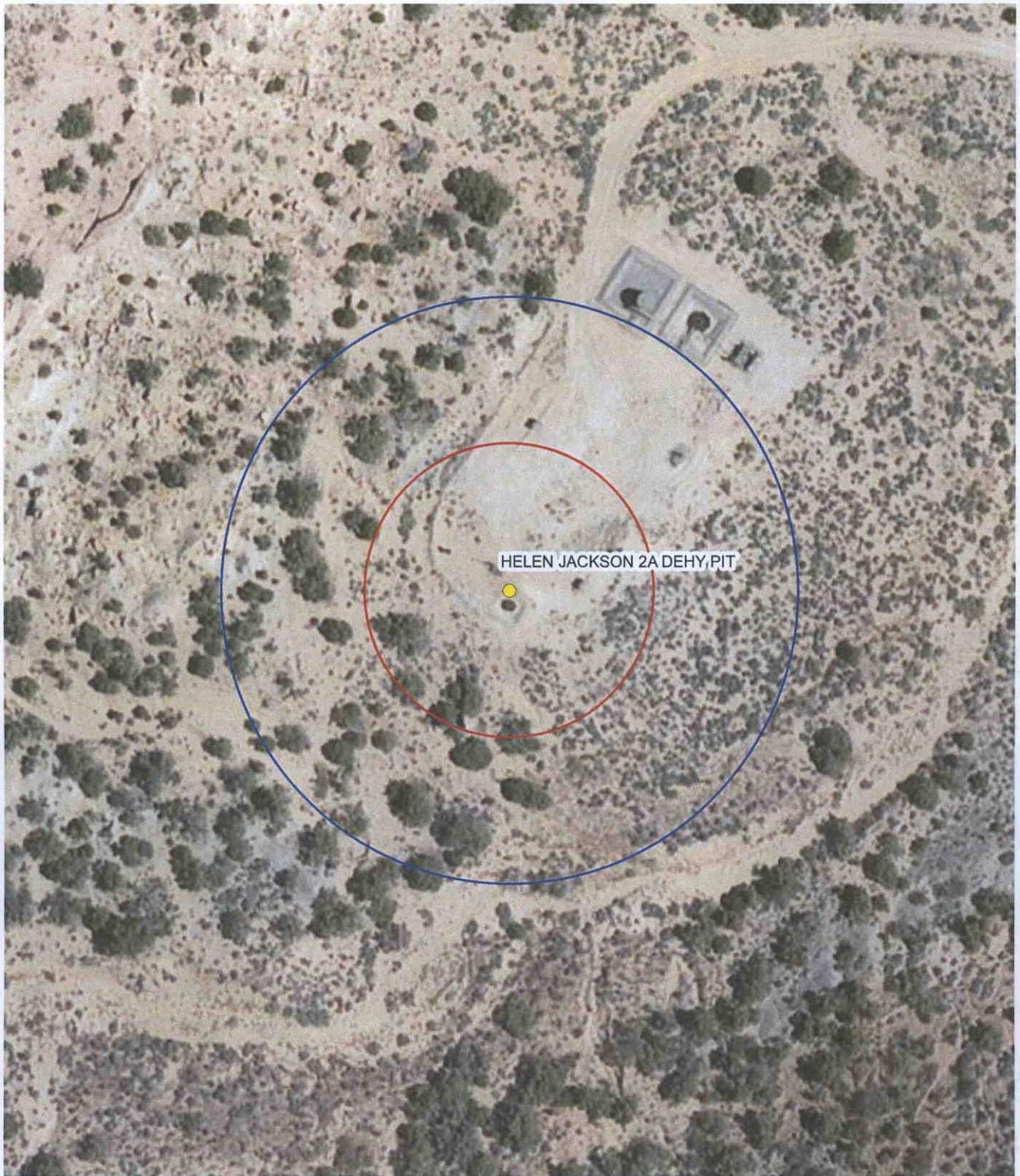


IMAGE COURTESY OF ESRI

LEGEND

-  BGT: BELOW GRADE TANK
-  100-FOOT RADIUS
-  200-FOOT RADIUS

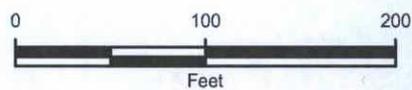


FIGURE 2
AERIAL PHOTOGRAPHIC MAP
HELEN JACKSON 2A DEHY PIT
SWSE SEC 33 T29N R9W
SAN JUAN COUNTY, NEW MEXICO
WILLIAMS FOUR CORNERS



COLORADO

NEW MEXICO

LA PLATA MINE

SAN JUAN COUNTY

SAN JUAN COUNTY

HELEN JACKSON 2A DEHY PIT

RIO ARRIBA COUNTY

LEGEND



BGT: BELOW GRADE TANK



NEW MEXICO MINERALS INDUSTRY LOCATOR SYSTEM



COAL MINE PERMIT BOUNDARY



COUNTY BOUNDARY

NEAREST MINE (LA PLATA) IS 20.9 MILES AWAY

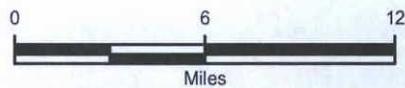


FIGURE 3
MINES, MILLS, AND QUARRIES MAP
HELEN JACKSON 2A DEHY PIT
SWSE SEC 33 T29N R9W
SAN JUAN COUNTY, NEW MEXICO
WILLIAMS FOUR CORNERS



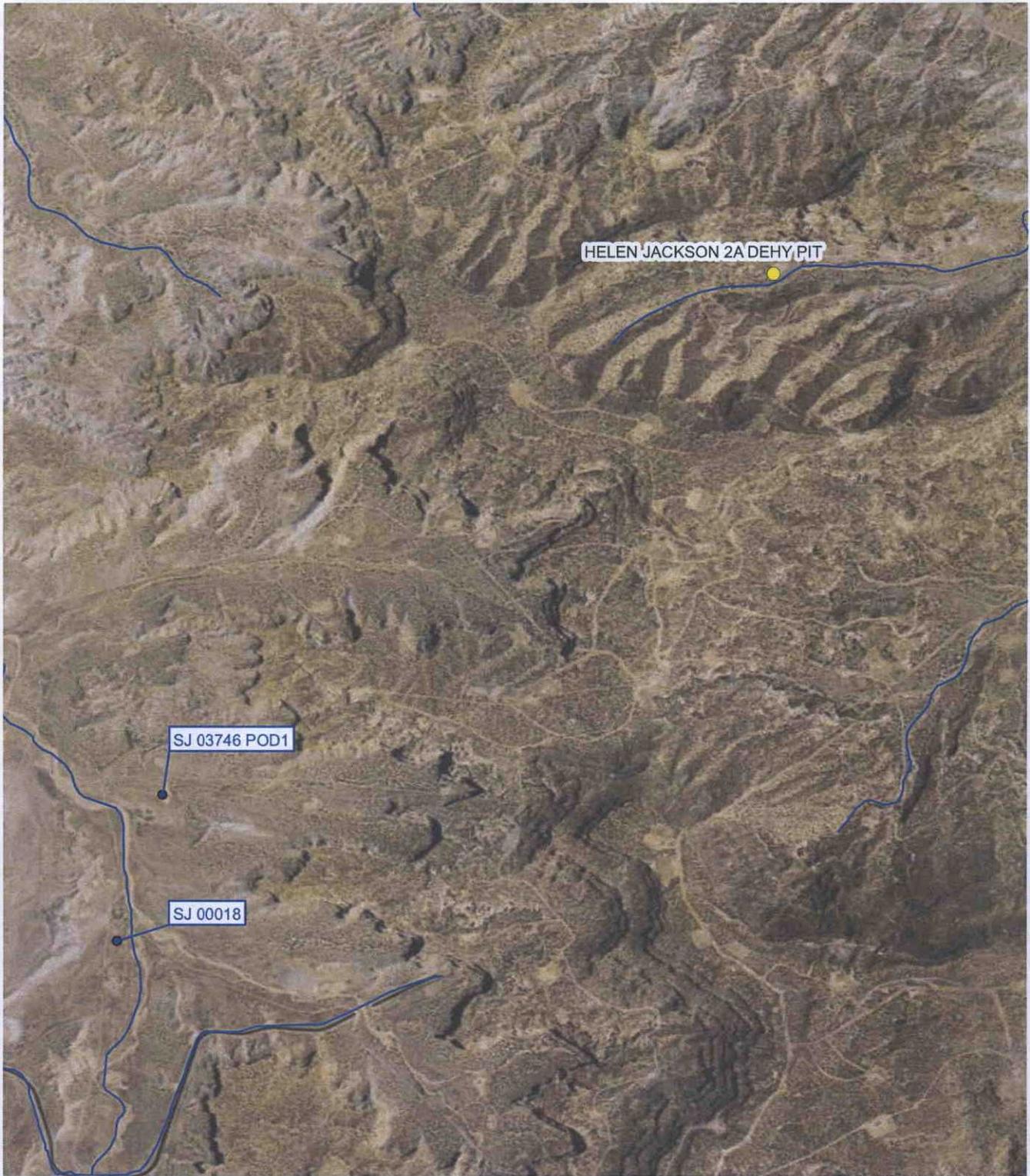


IMAGE COURTESY OF ESRI

LEGEND

- WATER WELL
- BGT: BELOW GRADE TANK
- SURFACE WATER

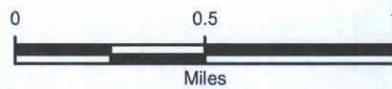
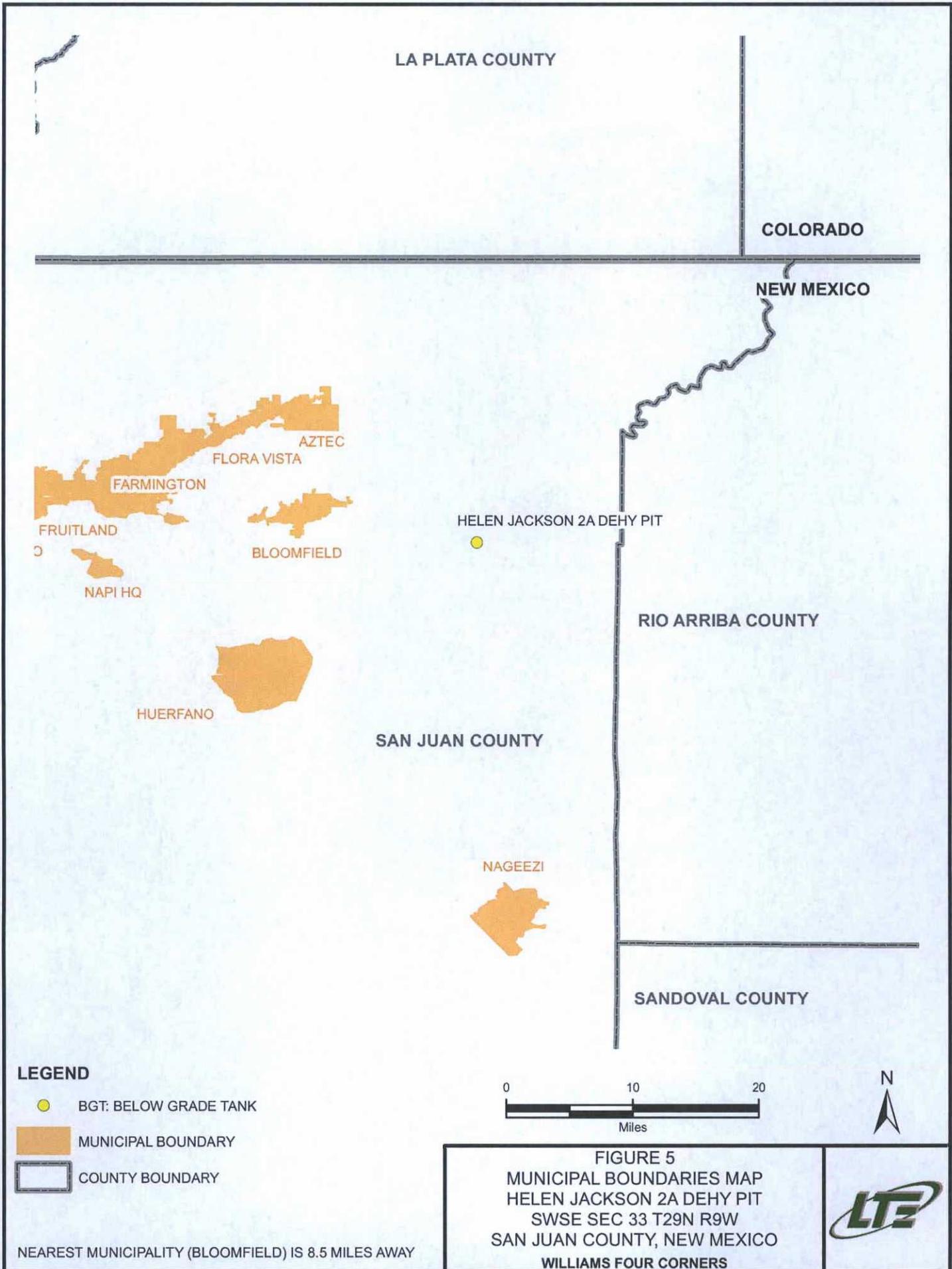


FIGURE 4
WATER WELL MAP
HELEN JACKSON 2A DEHY PIT
SWSE SEC 33 T29N R9W
SAN JUAN COUNTY, NEW MEXICO
WILLIAMS FOUR CORNERS







New Mexico Office of the State Engineer

Active & Inactive Points of Diversion

(with Ownership Information)

(R=POD has been replaced and no longer serves this file, (quarters are 1=NW 2=NE 3=SW 4=SE)
 C=the file is closed (quarters are smallest to largest) (NAD83 UTM in meters)

WR File Nbr	Sub basin	Use	Diversion	Owner	County	POD Number	Code	Grant	Source	6416	4	Sec	Tws	Rng	X	Y	Distance
SJ 03746		STK		3 MARY HELENE SULLIVAN	SJ	<u>SJ 03746 POD1</u>			Shallow	3	2	1	20	28N 09W	248330	4059955*	3941

Record Count: 1

UTMNAD83 Radius Search (in meters):

Easting (X): 251124.68

Northing (Y): 4062734.2

Radius: 4000

Sorted by: Distance

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



New Mexico Office of the State Engineer

Water Right Summary



[get image list](#)

WR File Number: SJ 03746

Subbasin: -

Subfile: -

Primary Purpose: STK 72-12-1 LIVESTOCK WATERING

Primary Status: PMT PERMIT

Total Acres:

Total Diversion: 3

Owner: MARY HELENE SULLIVAN

Documents on File

Trn #	Doc	File/Act	Status		Transaction Desc.	From/	Acres	Diversion	Consumptive
			1	2		To			
get images 365771	72121	2006-08-07	PMT	LOG	SJ 03746	T		3	

Current Points of Diversion

POD Number	Source	Q Q Q			(NAD83 UTM in meters)		Other Location Desc		
		6416	4	Sec	Tws	Rng		X	Y
<u>SJ 03746 POD1</u>	Shallow	3	2	1	20	28N09W	248330	4059955*	

An () after northing value indicates UTM location was derived from PLSS - see Help



**Williams Four Corners LLC
Closure Plan - Below Grade Tanks
San Juan Basin – New Mexico**

Background

The following Closure Plan has been developed to satisfy requirements of the "Pit Rule" as defined in Title 19 Chapter 15 Part 17 of the New Mexico Administrative Code (NMAC) and describes the requirements and procedures to be used by Williams Four Corners LLC (Williams) when removing below grade tanks (BGTs). The plan will be used when closing BGT locations owned or operated by Williams.

Certain BGTs targeted under this closure plan were, in some cases, installed subsequent to earthen pit closures and were constructed in conformance with New Mexico Oil Conservation Division (NMOCD) approved criteria. All BGTs have been operating in general compliance with NMOCD regulations developed prior to the new Pit Rule enacted in June 2013.

Applicability

This plan shall be implemented when any BGT is closed. The plan shall also be used if any leaking BGT is not retrofitted or modified to comply with applicable design criteria defined in the Pit Rule or when it is determined that continued operation of the BGT represents an imminent danger to fresh water, human health, or the environment. All BGTs with or without completely visible sidewalls, and that do not meet current design standards, shall be closed prior to sale, transfer, or change of Operator or will be retrofitted to meet current design standards.

If there are conditions at a BGT location which prevent or limit adherence to this plan, a separate site specific plan will be developed. Such a plan will be prepared and submitted to the NMOCD for approval and serve as a new, site specific closure plan.

Description of Work

Prior to initiating BGT closure work, notification will be made to the appropriate division district office at least 72 hours, but not more than one week, prior to any closure operation. As indicated on the variance page, notifications to NMOCD will be made in writing via email and will include the legal location of the BGT, and the well name / number and American Petroleum Institute (API) number if the BGT is associated with a well. Verbal notifications to the NMOCD will be provided at the request of the division district office.

In addition, the landowner of record (obtained through county tax records) will be notified in advance by certified mail with return receipt at least 72 hours, but not more than one week, prior to any closure operation. Notifications will provide operator identity, and legal location of the BGT, and the well name / number and API number if the BGT is associated with a well. Public entities including the Bureau of Land Management (BLM), State of New Mexico, local government/municipalities, and/or tribal agencies may be

notified via email based on their notification preferences (as indicated on the variance page).

Removal of liquids and sludge from the BGT will commence within 60 days of cessation of operations. The liquids and sludge removed from the BGT will be disposed at a division-approved facility. Removal of the BGT and any equipment associated with the BGT will commence within 6 months of cessation of operations. Williams will remove the BGT and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

Table 1 provides a summary of waste materials and the facility proposed for disposal or recycling. Williams may utilize other facilities which may be approved by the NMOCD in the future. As such, the selected disposal site will be identified on the closure form (C-144) prepared for each discrete closure action.

Table 1 - Summary of Waste Materials and Disposal Facilities

Waste Materials	Disposal Facility
Steel Tank	SJ County Landfill or Steel Recycling
Fiberglass Tank	SJ County or Bondad Landfill * or Re-use
Liner (cleaned – absent soil / sludge)	SJ County or Bondad Landfill
Sludge	Envirotech, IEI, TNT, or Bondad Landfill
Liquids (Water / Hydrocarbons)	Basin Disposal, Key Energy, TNT
Contaminated Soil	Envirotech, IEI, TNT, or Bondad Landfill
Fencing / Miscellaneous	Re-use or scrap

*The tank must be empty, cut up or shredded and EPA clean

The use of any disposal or recycling facility will be identified on the C-144 form submitted to the NMOCD as part of the closure report. Any and all ancillary equipment related to the tank will also be removed, including any synthetic liner material(s) and fencing. Williams will ensure that liners and liner material will be free of soil and sludge material and disposed of at a NMOCD approved solid waste facility (e.g. San Juan County Landfill or Permitted Colorado Facility).

Steel or fiberglass tanks will be removed and transported to a storage yard where the condition of each tank will be evaluated for recycling, reuse, or disposal. If the tank is not in a condition allowing reuse, it will either be shipped to a permitted recycling facility (for steel tanks) or it will be disposed of at the San Juan County Landfill (NMED Permit SWM-052426) or other NMOCD approved solid waste disposal site. Specific waste acceptance conditions of the landfill could necessitate further actions as appropriate. Such actions include, but may not be limited to, cutting, shredding, or sizing; emptying or cleaning of tanks or liner material, and otherwise those necessary to conform with permit conditions for Subtitle D disposal and conditions identified in 19.15.35.8 NMAC.

After the tank and equipment have been removed, soils beneath the tank will be tested and evaluated to determine if there is hydrocarbon impact or otherwise if a release event has occurred. Specific sampling protocol will follow the description provided in the Pit Rule which calls for a five point composite sample (see Sampling and Lab Analyses section) to include any obvious staining, or when wet or discolored soil exists, or if there is other evidence of contamination will be collected under the liner or BGT. Samples will

be shipped to an off-site environmental testing laboratory for proper analyses. Results will be submitted to the NMOCD on Form C-141. Further sampling may be required if NMOCD determines additional assessment work is necessary.

If there has been no release to underlying soils as demonstrated by soil analyses (i.e. lab results), or if impacts are below closure limits provided in the table below, then the depression (i.e., excavation) will be backfilled with "non-waste containing" fill material. Sampling of the excavated material is detailed in the Sampling and Laboratory Analyses section later in this plan. Depending on site conditions and operating needs, the backfilled area will be reclaimed with prescribed topsoil and reseeded.

Due to the fact that a majority of Williams BGTs are located on active well sites, reclamation efforts may be deferred in order to avoid impact to ongoing lease operations. In this event, the area of the retired BGT will be incorporated into the overall well site reclamation effort with Williams documenting surface owner and lease operator approval of the proposed alternative.

The BGT site will nevertheless be prepared to prevent erosion, and protect fresh water, human health, and the environment. Williams will submit this documentation to the NMOCD for approval.

Reclamation will be performed as early as possible with the goal of matching original conditions or the final land use. Restoration efforts shall incorporate proper contouring as described in the Pit Rule and shall be constructed in a manner to provide dust control, prevent ponding, and minimize erosion, utilizing drainage controls such as water bars and/or silt traps as appropriate. Topsoils and subsoils will be replaced to their original relative positions and contoured so as to achieve erosion control, long-term stability and preservation of surface water flow patterns. Soil cover suitable for vegetative growth will be equivalent to the background thickness of topsoil or a minimum one foot depth (or background thickness whichever is greater). The area will be contoured in a manner blending soil into/with the surrounding grade. Reclamation shall target the location of the BGT along with associated access roads (not used for production operations) and be implemented to ensure a safe and stable condition that blends with the surrounding undisturbed area.

Re-vegetation efforts will conform with NMOCD approved methods and recommendations including seed type and application rates. The reclaimed area will be reseeded in the first favorable growing season following closure of the BGT. Reclamation and revegetation will be considered complete when all ground surface disturbing activities at the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.

Any other obligations imposed by tribal or federal agencies will be adhered to if such obligations provide equal or better protection of fresh water, human health, and the environment. Williams will notify the NMOCD once reclamation and re-vegetation are complete.

Sampling and Laboratory Analyses

A minimum five point composite sample shall be collected from the soils beneath the BGT which will include any obvious stained, wet, or discolored soils, or soil showing other evidence of a release. Soil will be placed in clean glass jars and chilled and maintained at 4°C. Samples will be packaged and shipped under United States Environmental Protection Agency (USEPA) Chain-of-Custody protocol to an approved and certified environmental laboratory.

Soil samples collected from the earthen containment (i.e. BGT excavation) will be analyzed by an approved environmental laboratory by the listed test methods or as may be directed by the NMOCD. Table 2 summarizes the constituents of concern (COC), testing methods, and the closure limits defining action levels:

Table 2 - Summary of COCs, Test Methods, and Closure Limits

Depth below bottom of pit to groundwater less than 10,000 mg/L TDS	Constituents of Concern	Test Methods	Closure Limits (mg/Kg)**
≤50 feet	Chlorides	EPA 300.0	600
	TPH	EPA SW-846 Method 418.1	100
	GRO + DRO	EPA SW-846 Method 8015M	100
	BTEX	EPA SW-846 Method 8021B or 8260B	50
	Benzene	EPA SW-846 Method 8021B or 8015M	10
51 feet – 100 feet	Chlorides	EPA 300.0	10,000
	TPH	EPA SW-846 Method 418.1	2,500
	GRO + DRO	EPA SW-846 Method 8015M	1,000
	BTEX	EPA SW-846 Method 8021B or 8260B	50
	Benzene	EPA SW-846 Method 8021B or 8015M	10
>100 feet	Chlorides	EPA 300.0	20,000
	TPH	EPA SW-846 Method 418.1	2,500
	GRO + DRO	EPA SW-846 Method 8015M	1,000
	BTEX	EPA SW-846 Method 8021B or 8260B	50
	Benzene	EPA SW-846 Method 8021B or 8015M	10

** Or background concentration – whichever is greater.

If any contaminant concentration is higher than the parameters listed in Table I of 19.15.17.13 NMAC, the division may require additional delineation upon review of the results and Williams must receive approval before proceeding with closure. If all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, then Williams will proceed to backfill the excavation with non-waste containing, uncontaminated, earthen material.

Sampling of any excavated or stockpiled material, if required, shall conform with standard environmental sampling protocol. Samples from excavated materials (excavated to facilitate the BGT removal) will be composite samples comprised of at least five discrete samples from the inside and on the surface of the soil pile. A minimum of one composite will be collected from each 100 cubic yards of soil (i.e. one fraction from each cubic yard). Additional samples may be required at the direction of the

NMOCD. Every effort will be made to collect composite fractions from the inside and outside of the soil pile such that a "representative" sample is analyzed.

Stockpile sampling will be facilitated by utilizing a clean soil probe inserted into the soil pile at least three feet or by turning the soil pile with mechanized equipment to expose new soil. The goal is to collect a sample representative of the "whole". These samples will be handled and packaged as described above and be analyzed by the methods listed in Table 2. Soil with contaminant concentrations at or below the Closure Limits may be returned to the BGT excavation prior to initiating reclamation work.

Records and Documentation

All closure activities will be properly documented and include preparation of Form C-144 which shall be submitted to the NMOCD within 60 days of completing closure tasks. Information to be included in the closure report filing shall include, but not necessarily be limited to, the following:

- Proof of closure notice to NMOCD division and surface owner
- Confirmation sampling and analytical reports (results)
- Disposal facility name and permit information
- Description of capping and reclamation actions (i.e. revegetation rates)
- Photo documentation of site reclamation
- Other information required to complete applicable sections of C-144

As stated above, should conditions at any location necessitate a change to the approach described herein, separate site specific closure details will be provided as an addendum to this plan.