District 1 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

Pit Closed-Loop System Below-Grade Tank or

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.

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 Source 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 Operating Co, LLC OGRID #: 120782					
Address: PO Box 640 / 721 S Main Aztec, NM 87410					
Facility or well name: Rosa Unit #017C (Twin with Rosa #321A)					
API Number:30-039-30381OCD Permit Number:					
U/L or Qtr/Qtr L Section 20 Township 31N Range 5W County: Rio Arriba					
Center of Proposed Design: Latitude 36.88288 Longitude -107.3928724 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 <u>20</u> mil ☑ LLDPE ☐ HDPE ☐ PVC ☐ Other					
⊠ String-Reinforced					
⊠ String-Reinforced					

Liner Seams: Welded Factory Other
4. Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume:bbl Type of fluid:
Tank Construction material:
☐ 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: Thicknessmil

Alternative Method:

☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other

☐ Lined ☐ Unlined Liner type: Thickness

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

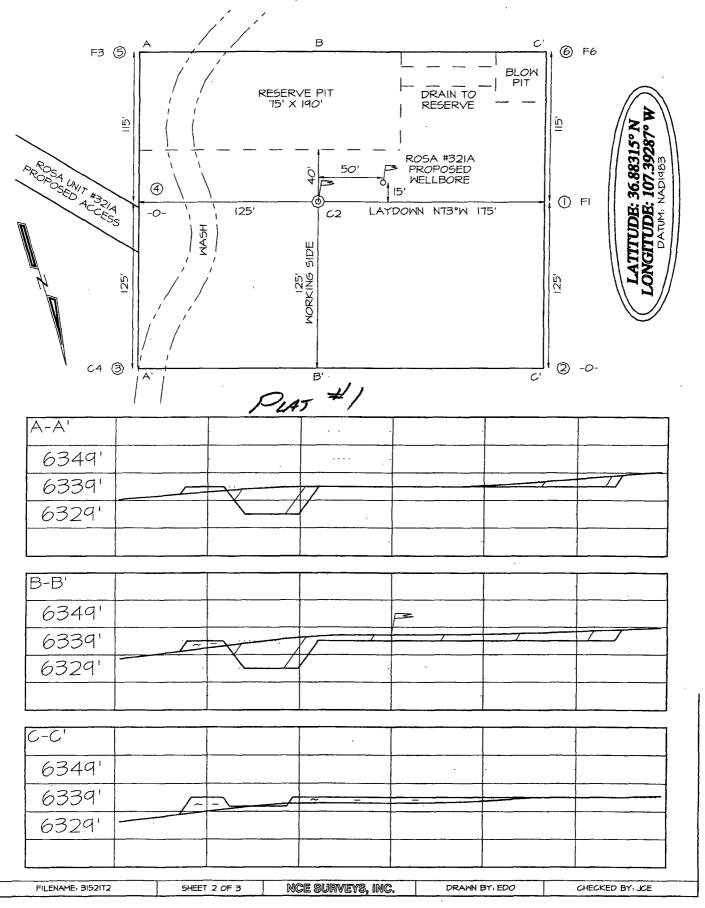
Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)					
Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)					
Four foot height, four strands of barbed wire evenly spaced between one and four feet					
Alternate. Please specify					
7.					
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)					
Screen Netting Other					
Monthly inspections (If netting or screening is not physically feasible)					
8. Signs: Subsection C of 19.15.17.11 NMAC					
12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers					
Signed in compliance with 19.15.3.103 NMAC					
9. Administrative Approvals and Exceptions:					
Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank:					
Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau	office for				
consideration of approval. Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.					
10. Siting Criteria (regarding permitting): 19.15.17.10 NMAC					
Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accept material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appro-					
office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a	pproval.				
Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dryi above-grade tanks associated with a closed-loop system.	ng pads or				
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.	☐ Yes ☑ No				
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ⊠ No				
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).	☐ Tes ☑ No				
- Topographic map; Visual inspection (certification) of the proposed site					
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	☐ Yes ☒ No ☐ NA				
(Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	L NA				
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	Yes No				
(Applies to permanent pits)	⊠ NA				
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ⊠ No				
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.					
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site					
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.	☐ Yes ☑ No				
- Written confirmation or verification from the municipality; Written approval obtained from the municipality					
Within 500 feet of a wetland.	☐ Yes ⊠ No				
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site					
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division					
Within an unstable area.	☐ Yes ⊠ No				
 Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 					
Within a 100-year floodplain FEMA map					

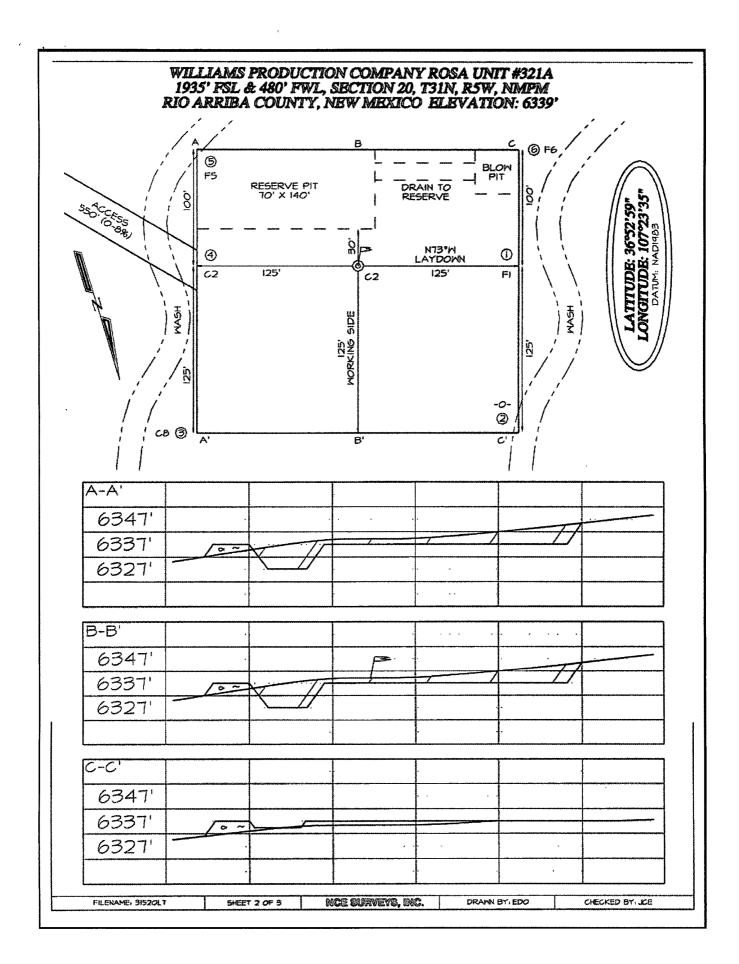
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached. Hydrogeologic Report (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 19.15.17.12 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					
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:					
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 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 ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control 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					
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 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 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 <i>will not</i> be used for future ser 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	С				
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 sou provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate dist considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Just demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.	rict office or may be				
Ground water is less than 50 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No				
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☑ No ☐ NA				
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA				
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ⊠ No				
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☑ No				
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☒ No				
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☒ No				
Within 500 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☑ No				
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☒ No				
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ⊠ No				
Within a 100-year floodplain FEMA map	☐ Yes ⊠ No				
18. On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure parts.	lan. 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 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 canr 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	.15.17.11 NMAC				

Operator Application Certification: I hereby certify that the information submitted with this application is true, ac	ccurate and complete to the best of my knowledge and belief.
Name (Print): Michael K. Lane	Title: Sr. EH & S Specialist
Signature:	Date:
e-mail address: <u>myke.lane@williams.com</u>	Telephone: <u>505-634-4219</u>
20. OCD Approval: □ Permit Application (including closure plan) □ Closur	re Plan (only) OCD Conditions (see attachment)
OCD Representative Signature: Brangle Vell	Approval Date: 8-27-08
OCD Representative Signature: Brand Pell Title: Envirolspec	OCD Permit Number:
Closure Report (required within 60 days of closure completion): Subsect Instructions: Operators are required to obtain an approved closure plan pri The closure report is required to be submitted to the division within 60 days section of the form until an approved closure plan has been obtained and the	ior to implementing any closure activities and submitting the closure report. of the completion of the closure activities. Please do not complete this
22. Closure Method: Waste Excavation and Removal On-Site Closure Method Alternative If different from approved plan, please explain.	ernative Closure Method Waste Removal (Closed-loop systems only)
two facilities were utilized.	drilling fluids and drill cuttings were disposed. Use attachment if more than
Disposal Facility Name:	
Disposal Facility Name:	
Were the closed-loop system operations and associated activities performed of ☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No	
Required for impacted areas which will not be used for future service and ope Site Reclamation (Photo Documentation) Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique	erations:
24. Closure Report Attachment Checklist: Instructions: Each of the followin 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 closu 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	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure belief. I also certify that the closure complies with all applicable closure requ	
Name (Print):	Title:
Signature:	Date:
e-mail address:	Telephone:

WILLIAMS PRODUCTION COMPANY ROSA UNIT #17C 1940' FSL & 535' FWL, SECTION 20, T31N, R5W, NMPM RIO ARRIBA COUNTY, NEW MEXICO ELEVATION: 6341'





Hydrogeological Report Williams Production Company, LLC Rosa Unit #017C (Twin #321A)

Regional Hydrological Context

Referenced Well Location:

The proposed well is located on New Mexico Department of Game and Fish land just west of the Carson National Forest, Jicarilla Ranger District in Rio Arriba County, New Mexico. This location is in the northeastern portion of the San Juan Basin, an asymetrical syncline that extends from northwestern New Mexico into southwestern Colorado (Carson National Forest DEIS, 2007). Elevation of the proposed well is approximately 6339 feet MSL.

General Regional Groundwater Description:

This region is underlain by sandstone aquifers of the Colorado Plateau. The primary aquifer of potential concern at this location is the Unita-Animas Aquifer, composed primarily of Lower Tertiary rocks in the San Juan Basin. The aquifer consists of the San Jose Formation; the underlying Animas formation and its lateral equivalent, the Nacimiento formation; and the Ojo Alamo Sandstone. The thickness of the Unita-Animas aquifer generally increases toward the central part of the basin. In this region, the maximum thickness of the aquifer is approximately 3500 feet (USGS, 2001). This aquifer contains fresh to moderately saline water.

Groundwater generally flows toward the San Juan River and it tributaries, where it becomes alluvial groundwater or is discharged to stream flow. Additional information regarding the hydrogeologic setting can be found in the provided references.

References:

Allen, Erin. Undated. Colorado Plateau Aquifers. http://academic.emporia.edu/schulmem/hydro/TERM%20PROJECTS/2007/Allen/Aquifer.html.

United States Department of Agriculture, Forest Service. 2007. Draft Environmental Impact Statement for Surface Management of Gas Leasing and Development. Jicarilla Ranger District, Carson National Forest, Rio Arriba County, New Mexico.

United States Department of the Interior. Bureau of Land Management. 2003. Final Farmington Resource Management Plan and Final Environmental Impact Statement. Farmington Field Office, Farmington, New Mexico.

United States Geological Survey. 2001. Ground Water Atlas of the United States: Arizona, Colorado, New Mexico and Utah. USGS Publication HA 730-C; http://capp.water.usgs.gov.

Site Specific Information:

The site is located within the lower elevations of a southwestern Surface Hydrology:

> facing slope, on the northern side of Laguna Seca Draw. Laguna Seca Draw is located over 500 feet from the proposed reserve

pit.

1st Water Bearing Formation:

Formation Thickness:

Underlying Formation: Depth to Groundwater: San Jose, Tertiary

Approximately 1,900 ft. Nacimiento, Tertiary

Depth to groundwater is estimated at over 100 feet bgs. The

nearest iWATERS well with recorded depth data is SJ-03556, which is over 16,000 feet to the south and has a depth to groundwater recorded as 250 feet bgs. A cathodic well (Rosa #232), which is located in the same section as the Rosa #321A pit and at a similar elevation, has depth to moisture recorded at

300 feet.

New Mexico Office of the State Engineer POD Reports and Downloads

Township: 31N Range: 05W Sections:						
NAD27 X: Y: Zone: Search Radius:						
County: Basin: Number: Suffix:						
Owner Name: (First) (Last) C Non-Domestic Domestic All						
POD / Surface Data ReportAvg Depth to Water ReportWater Column Report						
WATER COLUMN REPORT 08/06/2008						
(quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are biggest to smallest) POD Number Tws Rng Sec q q q Zone X Y Well Water Column						
No Records found, try again						

New Mexico Office of the State Engineer POD Reports and Downloads

Township: 31N Range: 06W Sections:							
NAD27 X: Y: Zone: Search Radius:							
County: Number: Suffix:							
Owner Name: (First) (Last)	o ,	Non-Domesti	C Do	mestic 🕟	All		
POD / Surface Data ReportAvg Depth	to Water Report	Water Colum	1 Report				
WATER COLUMN RE (quarters are 1=NW 2=NE 3=SW 4=SE)	PORT 08/06/:	2008		and the control of th			
(quarters are biggest to smallest) POD Number Tws Rng Sec q q Q Zone	x y	Depth Well	Depth Water	Water Column	(in	feet)	
SJ 03685 POD1 31N 06W 07 1 2 4 SJ 00011 31N 06W 32	-	460 610	310	150			

Record Count: 2

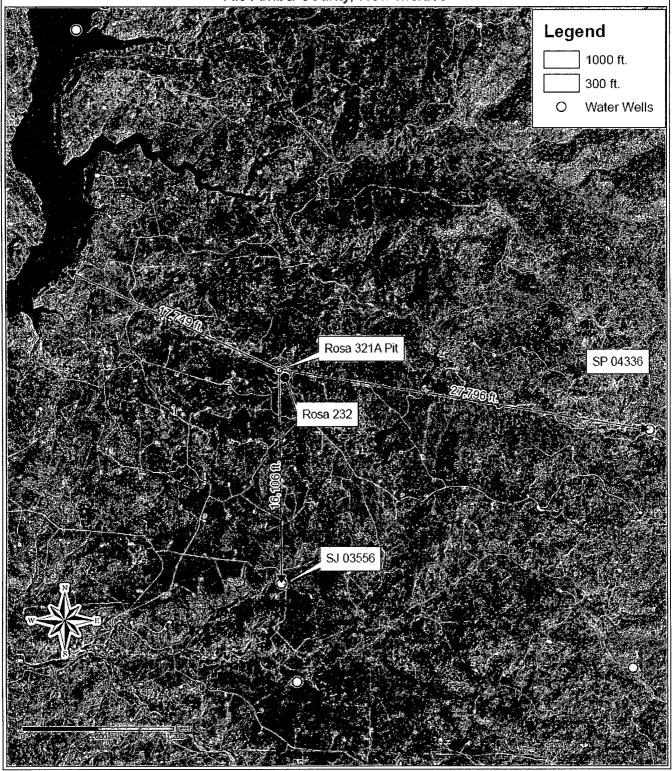
New Mexico Office of the State Engineer POD Reports and Downloads

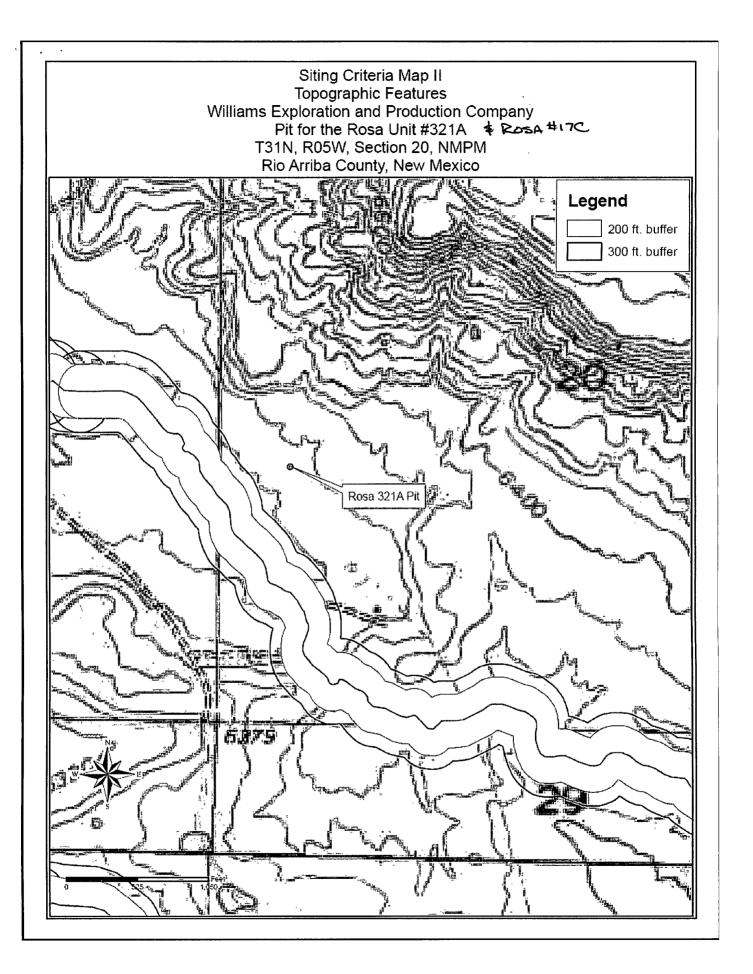
Township: 30N Range: 05W Sections:						
NAD27 X: Y: Zone:	Search Radius:					
County: Basin: Number: Suffix:						
Owner Name: (First) (Last) C	on-Domestic Domestic All					
POD / Surface Data ReportAvg Depth to Water ReportW	'ater Column Report					
WATER COLUMN REPORT 08/06/20 (quarters are 1=NW 2=NE 3=SW 4=SE)	008					
(quarters are biggest to smallest)	Depth Depth Water (in feet)					
POD Number Tws Rng Sec q q q Zone X Y	Well Water Column					
<u>SJ 03556</u> 30N 05W 06 4 2 4	450 250 200					
SJ 02771 30N 05W 17 1 1 2	325 137 188					

Record Count: 2

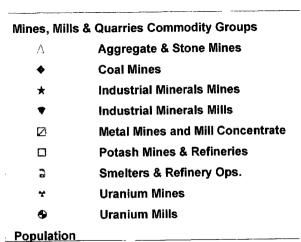
New	Cathodic						
Gas	Reference Gas					Depth to	
Well	Well	API	L	ocatio	n	Moisture	Elev
017C	232	3003924643	31N	05W	20M	300	6330

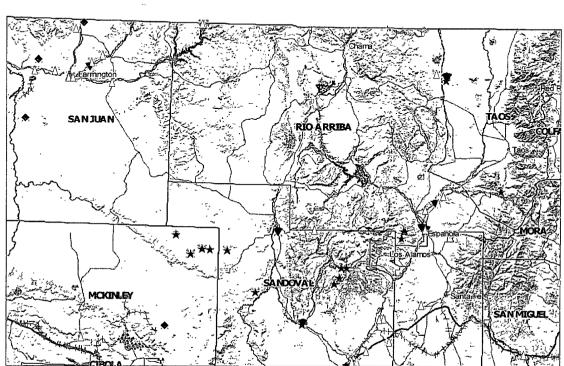
Siting Criteria Map I Existing known Water Wells and Springs Williams Exploration and Production Company Pit for the Rosa Unit #321A ♣ ♣ ♣ 17€ T31N, R05W, Section 20, NMPM Rio Arriba County, New Mexico

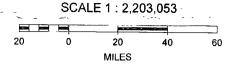




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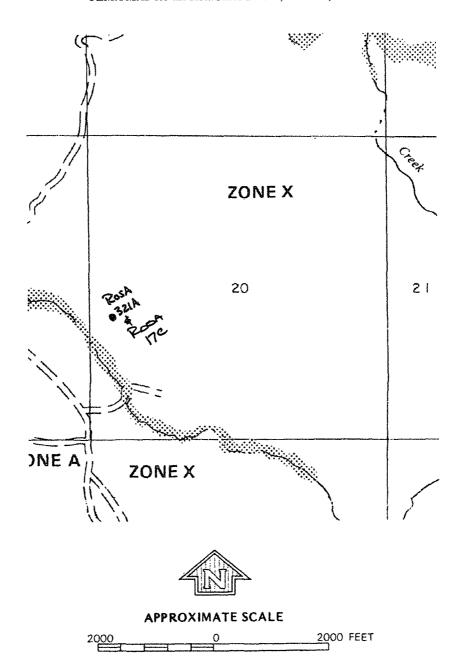
FEMA Map – 100-Year Floodplain:

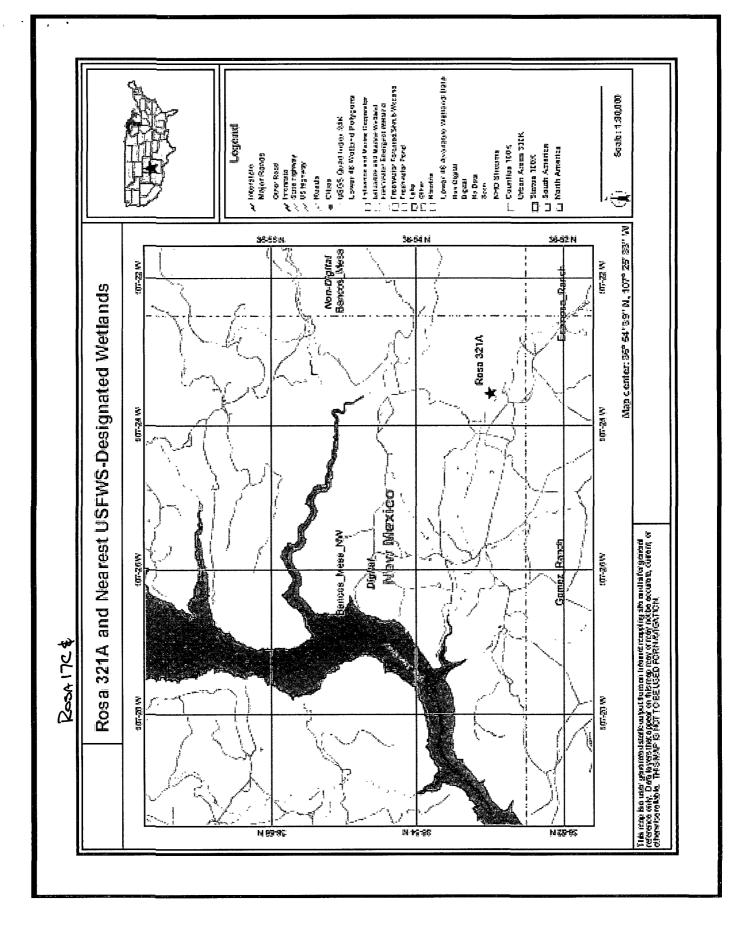
According to FEMA records, this site is not located in a 100-year floodplain (see attached FEMA map).

Siting Criteria Compliance Demonstrations:

The Rosa Unit #017C (twin #321A) well site is not located in an unstable area. The location is not situated over a mine or a steep slope. Excavated pit material will not be located within 300 feet of a continuously flowing water course or within 200 feet of any other significant water course, lakebed, sinkhole, or playa lake (see Siting Criteria Map II). The site is not within 500 feet of any reported riparian areas or wetlands (see attached USFWS wetland map); within 500 feet of any private, domestic fresh water well or spring; or within 1000 feet of any other fresh water well or spring (see Siting Criteria Map I). The pit will not be within any incorporated municipal boundaries or defined municipal freshwater well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. The location of the proposed pit is not within 300 feet of any permanent residence, school, hospital, institution, or church.

FEMA MAP for the Rosa 321A T. 31N., R. 05 W., NMPM





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

Temporary Pit In-place Closure Plan Drilling/Completion and Workover (Groundwater >100 feet bgs)

In accordance with Rule 19.15.17.13 NMAC, the following plan describes the general in-place closure requirements of temporary pits on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico. This is WPX's standard procedure for all temporary pits to be utilized for the drilling, completion and/or workovers of oil and gas wells operated by WPX. For those temporary pits 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:

- Details on Capping and Covering, where applicable
- Plot Plan (Pit Diagram)
- Inspection reports
- Sampling Results
- Division Form C-105: WELL COMPLETION OR RECOMPLETION REPORT AND LOG
- Copy of Deed Notice filed with the County Clerk (format to meet County requirements)

General Plan Requirements:

- 1. All free standing liquids will be removed from the pit at the start of the closure process. Liquids will be removed in a manner that the appropriate District Office approves including; recycled, reused, reclaimed, evaporated, and/or disposed of in a Division-approved facility.
- 2. The preferred method of closure for all temporary pits will be on-site closure by in-place burial, provided all the criteria in 19.15.17.13.B are met.
- 3. The surface owner shall be notified of WPX's proposed clclosure plan using a means that provides proof of notice (i.e. certified mail/retrun receipt requested)
- 4. Within six months of the "rig-off" status occurring WPX will ensure that the temporary pit is covered, recontoured and reseeding in progress.
- 5. 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)
- 6. The pit liner shall be removed above "mud level" after stabilization. Removal of the liner will consist of manually or mechanically cutting the liner at the mud level and removing all remaining liner. Care will be taken to remove "all" of the liner (I.e. anchored material). All excessive liner will be disposed of at a licensed disposal facility (probably San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426).
- 7. Solidification of the remaining pit contents shall be achieved by mixing non-waste containing, earthen material. The solidification process will be accomplished use a combination of natural drying and mechanical mixing. Pit contents will be mixed with non-waste, earthen material to a consistency that is deemed safe and stable. The mixing ratio shall not exceed 3 parts non-waste to 1 part pit contents.
- 8. A five-point composite sample will be taken of the pit using sampling tools and all samples tested per 19.15.17.13(B)(1)(b) NMAC. In the event that the criteria are not met (See Table 1), all contents will be handled per 19.15.17.13(B)(1)(a) (i.e. dig and haul to a Division-approved facility). Approval to haul will be requested of the Aztec District office prior to initiation.

Table 1: Closure Criteria for Temporary Pits in Non-sensitive Areas

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	2500
	Method 418.1	
GRO/DRO	EPA SW-846 Method 8015M (GRO/DRO)	500
Chlorides	EPA SW-846 Method 300.1	1000

^{*} Preferred method

- 9. Upon completion of solidification and testing, the pit area will be backfilled with non-waste earthen material compacted to native conditions to enable effective revegetation for successful evapotranspiration. A minimum of four feet of cover including replacement of one foot of suitable material to establish vegetation, or the background thickness of topsoil, whichever is greater.
- 10. Following cover, the site will be recontoured to meet the Surface Management Agency or surface owner requirements. Re-contouring will attempt to match fit, shape, line form, and texture of the surrounding geography. Re-shaping will include drainage control, prevent ponding, and minimize erosion. Natural drainages will be unimpeded and stormwater Best Management Practices (BMPs) will be used to aid in soil stabilization and protection surface water quality.
- 11. Notification will be sent to the Aztec District office when the reclaimed area is seeded.
- 12. WPX shall 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.
- 13. The temporary pit will be located with a steel marker, no less than four inches in diameter, cemented in a hole three feet deep in the center of the on site burial upon the abandonment of all wells on the pad. The marker will be flush with the ground to allow access of the active well pad and for safety concerns. The marker will include a threaded collar to be used for future abandonment. The top of the marker will contain a welded steel 12" square plate that indicates the on site burial of the temporary pit. The plate will be easily removable and a four-foot tall riser will be threaded into the top of the collar marker and welded around the base with the operations information at the time of all wells on the pad abandoned. The information will include Operator Name, Lease Name, Well Name, and number, USTR, and an indicator that the marker is an onsite pit burial location.

Lane, Myke (E&P)

From: Lane, Myke (E&P)

Sent: Monday, August 18, 2008 1:40 PM

To: kathy.mckim@state.nm.us

Cc: 'Brandon.powell@state.nm.us'; Higgins, Larry (E&P); Riley, Heather (E&P)

Subject: RE: Pit Closure - Rosa 017C

Ms. McKim;

Since the Rosa 017C well is located on the same pad as the Rosa 321A, this notice is a common notice that the pit used for both wells will be closed in place follow the curret NMOCD rules. Please contact me if there are any questions.

Myke Lane

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

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

From: Lane, Myke (E&P)

Sent: Monday, August 11, 2008 3:26 PM

To: kathy.mckim@state.nm.us

Cc: Brandon.powell@state.nm.us; Higgins, Larry (E&P); Riley, Heather (E&P)

Subject: Pit Closure - Rosa 321A

Ms. McKim;

This correspondence is to notify the NM Game and Fish Department that Williams Production is planning to close the temporary pit associated with the drilling and completion of the reference well on-site. The planned closure is consistent with the Surface Use Plan submitted with Williams APD, approved earlier.

This notice is to comply with the NMOCD Pit Rule 19.15.17 NMAC requirement to notify surface owners of the operator's intended closure method. If site conditions do not allow Williams to close in-place, we will provide your office with prior notice should the BLM have any concerns.

Please contact us if there are any questions or additional information is required

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

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