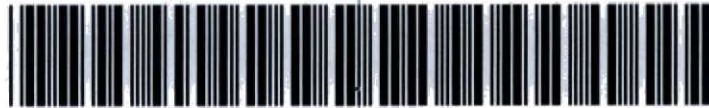




# AE Order Number Banner

## Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number:** pENV00003RP364

**3RP - 364**

**WILLIAMS FOUR CORNERS, LLC**

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.

OIL CONS. DIV DIST. 3

Release Notification and Corrective Action

NOV 07 2016

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: Williams Four Corners LLC	Contact: Matt Webre	
Address: Arroyo 1755 Arroyo Drive, Bloomfield, NM 87413	Telephone No.: (505) 632-4442	
Facility Name: Florance Gas Com J No. 16A	Facility Type: Pipeline	
Surface Owner: BLM	Mineral Owner	API No. 30-045-21790

LOCATION OF RELEASE

Unit Letter P	Section 6	Township 30N	Range 9W	Feet from the	North/South Line	Feet from the	East/West Line	County San Juan
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Latitude 36.835162° N Longitude -107.816092° W

NATURE OF RELEASE

Type of Release: Natural Gas Condensate/Produced Water	Volume of Release:	Volume Recovered:
Source of Release: Historical natural gas gathering operations	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? N/A	
By Whom? N/A	Date and Hour: N/A	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. Not Applicable	

If a Watercourse was Impacted, Describe Fully.\*

Not Applicable


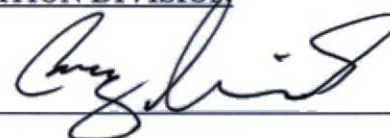
Describe Cause of Problem and Remedial Action Taken.\*

Historical release(s) in area impacted soil and groundwater at the well location.

Describe Area Affected and Cleanup Action Taken.\*

OCD required both BP and Williams to perform remediation within a required timeframe as described in the OCD letter dated October 6, 2016. The attached response letter describes the remediation actions completed to date by Williams and includes an extension request to allow Williams additional time to complete required remediation actions.

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: 	OIL CONSERVATION DIVISION	
Printed Name: Matt Webre	Approved by Environmental Specialist: 	
Title: EHS Supervisor	Approval Date: 11-10-16	Expiration Date:
E-mail Address: matt.webre@williams.com	Conditions of Approval: 3RP-364	Attached <input checked="" type="checkbox"/>
Date: 11/03/2016	Phone: (505) 632-4442	

\* Attach Additional Sheets If Necessary

5



1755 Arroyo Drive  
Bloomfield, NM 87413  
(505) 632-4700  
Fax (505) 632-4782

**Email and US Mail**

November 3, 2016

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

Re: Florance Gas Com J16A – Response for 2016 Release Investigation, Florance Gas Com J # 16A, 30-045-21790, Section 6, Township 30N, Range 9W

Dear Mr. Smith,

In response to the letter Williams Four Corners LLC (Williams) received from the New Mexico Oil Conservation Division (OCD) dated October 6, 2016, Williams is submitting this letter requesting an extension to the defined OCD requirements.

**Required Investigation and Remediation Actions**

Based on the OCD letter dated October 6, 2016, Williams was required to complete the following actions:

- Within 30 days Williams will remediate both horizontally and vertically the area near SV-33, SV-34, the former BGT location, and the former PNM earthen pit area.
- Within 30 days Williams will start the recovery of Non-Aqueous Phase Liquids (NAPL) from MW-3 or within 30 days following the excavation Williams will drill and install a replacement well in the vicinity of MW-3 and commence the recovery of NAPL if needed.
- Within 45 days Williams will provide the OCD with a Draft Ground Water Remediation plan as requested in March 2016.

**Summary of Remediation Actions Completed to Date**

Below is a summary of the actions completed to address the OCD's requirements listed above:

- BP and Williams began general discussions on remedial actions as well as allowing Williams access to MW-3 on October 13, 2016.



- Williams submitted a soil remediation plan to the OCD and BLM for approval on October 26, 2016.
- Williams received approval of the soil remediation plan from OCD on October 28, 2016 and BLM on November 1, 2016.
- Williams initiated soil remediation on November 1, 2016 for locations SV-33, SV-34, the former BGT location, and the former PNM earthen pit area. Soil remediation actions are ongoing at this time.
- Williams received a draft access agreement from BP for the use of monitoring well MW-3. Williams cannot use MW-3 until the agreement between both parties is approved which is currently ongoing.

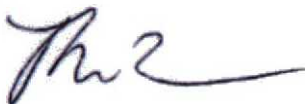
### **Extension Request**

Williams is requesting an extension to all the requirements defined in the OCD letter as presented above. This request is being submitted prior to the lapse of the required timeframe. The justifications for the extensions are provided below:

- Williams initiated soil remediation activities prior to the required deadline. Remediation is ongoing and is expected to continue until horizontal and vertical extents are achieved or the excavation extents are approved by OCD and BLM pending additional soil remediation actions to be completed in the future.
- In regards to the requirement to initiate NAPL recovery within 30 days, Williams is required to remediate soil in the vicinity of former PNM earthen pit area and MW-3. Installation of NAPL recovery equipment is not feasible at this time as the soil immediately surrounding will be excavated. This was verbally communicated to OCD during the October 27, 2016 meeting conducted at the well pad. It is expected that MW-3 will likely be destroyed during soil remediation and will require a replacement well within 30 days following excavation completion.
- Williams is required to submit a draft groundwater remediation plan within 45 days. Williams understands the urgency to address groundwater impacts at the location and proposes that submittal of the draft groundwater remediation plan will be submitted within 45 days of completion of BP and Williams soil remediation activities. This extension will allow the use of data obtained from the soil remediation, including new sources that are found during remediation, to be used to create an effective groundwater remediation plan.

Please contact me at (505) 632-4442 with any questions regarding this response.

Sincerely,



Matt Webre, PG  
EH&S Supervisor

Mr. Smith  
November 3, 2016  
Page 3

cc: Brandon Powell, OCD  
Katherina Diemer, BLM

State of New Mexico  
Energy, Minerals and Natural Resources Department

Susana Martinez  
Governor

Tony Delfin  
Acting Cabinet Secretary

David R. Catanach, Division Director  
Oil Conservation Division



November 10, 2016

**Re: Extension Request**

**Well: Florance Gas Com J #16A, 30-045-21790, Section 6, Township 30N, Range 9W**

Mr. Webre,

The Oil Conservation Division (OCD) has reviewed the Williams Four Corners (Williams) extension request received on November 7, 2016. Below are the OCD conditions of approval.

- Williams will be granted a 30-day extension to complete remediation as outlined in the October 6, 2016 letter, so long as the remediation is continuous.
- Within 15 days of completion of ongoing Williams excavations, Williams will commence NAPL recovery from MW-3 (If applicable) OR within 30 days following excavation completion Williams will drill a replacement recovery well near MW-3 as described in the October 6, 2016 Letter and commence NAPL recovery.
- Williams will adhere to the Draft Ground Water Remediation plan as required in the October 6, 2016 letter.

Additional extensions may be granted to Williams concerning the onsite remediation so long as the following conditions are met;

- Remediation is continuous or Williams has been approved to suspend remediation efforts temporarily.
- The extensions only allow for continuous on-site remediation.
- The extension request is made to the District prior to the lapse of the required timeframe.

If you have additional questions, please feel free to call me at 505-334-6178 Ext. 115.

Sincerely,

Cory Smith  
Environmental Specialist  
Energy, Minerals, & Natural Resources Department  
Oil Conservation Division  
1000 Rio Brazos Rd, Aztec, NM 87410  
[cory.smith@state.nm.us](mailto:cory.smith@state.nm.us)