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 1220 S. St. Francis Dr., Santa Fe, NM 87505

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

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.
For permanent pits and exceptions submit to

the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

687	
6	

Alternative Method:

ω1	Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application													
981	Type of action: below-grade tank	Closure of Modification Closure p	of a pit, closed tion to an exist tolan only subr	I-loop system, sting permit nitted for an e	below-g	grade tan	ık, or pro	posed al	ternative m	nethod	m,			
Instruct	ions: Please submit	one applicatio	n (Form C-144	) per individua	pit, clos	ed-loop s	ystem, be	low-grade	e tank or alt	ternative requ	est			
nvironment. Nor	hat approval of this rec does approval relieve t													
Operator:	Wil	liams Operatin	g Co, LLC			OGRID #	<b>#:</b>		1207	<u> 182</u>				
	PO Box 640													
	name:													
	3004529267													
	<u>C</u> Section													
Center of Propos	ed Design: Latitude	36.	94066	Longit	ude		-107.464	78	NA	AD: 🔲 1927 🏾	☑ 1983			
Surface Owner:	∑ Federal      ☐ State      [	Private 🔲 🛚	Γribal Trust or Ι	Indian Allotmer	t									
2.														
Pit: Subsec	tion F or G of 19.15.	17.11 NMAC												
Temporary:	Drilling 🗌 Workove	er												
	Emergency Cav													
Lined U	nlined Liner type:	Thickness	mil 🔲	LLDPE 🗌 HD	PE 🗌 F	PVC 🗆 (	Other							
String-Reinfo														
Liner Seams:	Welded  Factory	Other		Vol	ume:	bb	1 L	_ x W	x D					
3.								<u> </u>		· · · · · · · · · · · · · · · · · · ·				
	System: Subsection			<b>5</b>										
Type of Operation intent)	on: 🗌 P&A 🔲 Drill	ling a new wel	I 🔲 Workover	or Drilling (Ap	plies to a	activities	which rec	juire prior	approval of	a permit or no	otice of			
Drying Pad	☐ Above Ground S	teel Tanks	Haul-off Bins	Other			_							
	lined Liner type: Th				HDPE	☐ PVC	Othe	r						
Liner Seams:	Welded Factory	Other _												
4.														
⊠ <u>Below-grade</u>	tank: Subsection I													
Volume:120														
	on material: <u>Dou</u>													
	ontainment with leak													
	walls and liner 🔲 V													
Liner type: Thic	kness	mil [	☐ HDPE ☐ I	PVC  Other										
			<del></del>											

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

•	
6. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)	
Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, institution or church)	hospital,
Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify BLM Specifications	
7.	
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent puts 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 consideration of approval.	office for
Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	
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 approoffice or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drylabove-grade tanks associated with a closed-loop system.	priate district pproval.
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ 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).  - 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.  (Applies to temporary, emergency, or cavitation pits and below-grade tanks)  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☑ No ☐ NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits)	☐ Yes ☐ No 図 NA
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
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	☐ 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

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
<ul> <li>☑ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC</li> <li>☑ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC</li> <li>and 19.15.17.13 NMAC</li> </ul>
Previously Approved Design (attach copy of design) API Number: or Permit Number:
12.
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.
☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9 ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
Previously Approved Design (attach copy of design) API Number:
Previously Approved Operating and Maintenance Plan API Number:(Applies only to closed-loop system that use
above ground steel tanks or haul-off bins and propose to implement waste removal for closure)
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
<ul> <li>☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC</li> <li>☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC</li> </ul>
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
<ul> <li>Nuisance or Hazardous Odors, including H₂S, Prevention Plan</li> <li>Emergency Response Plan</li> </ul>
Oil Field Waste Stream Characterization
<ul> <li>         Monitoring and Inspection Plan         <ul> <li>□ Erosion Control Plan</li> </ul> </li> </ul>
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
<ul> <li>☐ Waste Removal (Closed-loop systems only)</li> <li>☐ On-site Closure Method (Only for temporary pits and closed-loop systems)</li> </ul>
☐ In-place Burial ☐ On-site Trench Burial
Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)
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.
<ul> <li>✓ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC</li> <li>✓ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC</li> </ul>
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
<ul> <li>Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC</li> <li>Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC</li> </ul>
Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.I Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if facilities are required.	
Disposal Facility Name: Disposal Facility Permit Number:	
Disposal Facility Name: Disposal Facility Permit Number:	
Will any of the proposed closed-loop system operations and associated activities occur on or in areas that will not be used for future service. Yes (If yes, please provide the information below) No	vice and operations?
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 G of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC	C
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 soun provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate distriction of acceptable sound and exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications 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 ☐ NA
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ 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
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
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ⊠ No
Within a 100-year floodplain FEMA map	☐ Yes ⊠ No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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 Subsection F 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 cann 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 G of 19.15.17.13 NMAC	15.17.11 NMAC

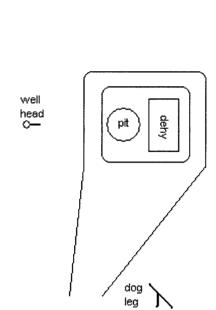
19.
Operator Application Certification:  Thereby possible that the information submitted with this application is true accurate and complete to the best of my knowledge and belief
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.
Name (Print): Michael K. Lane Title: Sr. EH & S Specialist
Signature: Date: 9/1/10
e-mail address: <u>myke.lane@williams.com</u> Telephone: <u>505-634-4219</u>
20.  OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)
OCD Representative Signature: Approval Date: Z/3/1/
OCD Representative Signature:
Closure Report (required within 60 days of closure completion): Subsection K of 19.15.17.13 NMAC  Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.
Closure Completion Date:
22.  Closure Method:  Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-loop systems only)  If different from approved plan, please explain.
23.  Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:  Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.
Disposal Facility Name: Disposal Facility Permit Number:
Disposal Facility Name: Disposal Facility Permit Number:
Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations?  Yes (If yes, please demonstrate compliance to the items below)  No
Required for impacted areas which will not be used for future service and operations:  Site Reclamation (Photo Documentation) Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique
Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.  Proof of Closure Notice (surface owner and division) Proof of Deed Notice (required for on-site closure) Plot Plan (for on-site closures and temporary pits) Confirmation Sampling Analytical Results (if applicable) Waste Material Sampling Analytical Results (required for on-site closure) Disposal Facility Name and Permit Number Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique Site Reclamation (Photo Documentation) On-site Closure Location: Latitude Longitude NAD: 1927 1983
25.
Operator Closure Certification:  I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.
Name (Print): Title:
Signature: Date:

Telephone:

e-mail address:

cps





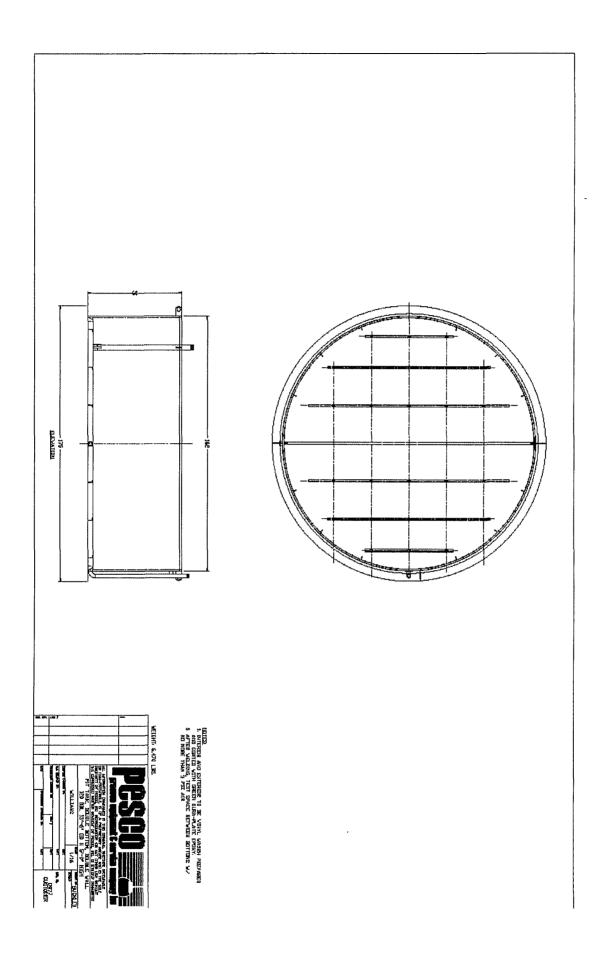
### Williams Production Co., LLC San Juan Basin: New Mexico Assets

Production Pit: Buried Double-Wall Steel Tank
Design and Construction Plan

In accordance with Rule 19.15.17 NMAC, the following plan describes the general design and construction (D&C) of production pits using buried double-wall steel tanks on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexićo. For those production pits which do not conform to this standard plan, a separate well-specific D&C plan will be developed and utilized.

### General Plan Requirements:

- 1. WPX will design and construct a production pit to contain liquids associated with the dehydration and compression of produced natural gas, which will prevent contamination of fresh water resources and protect public health and the environment.
- 2. The pit will be located as close as possible to the well and associated production/process equipment to minimize surface disturbance. Prior to excavation for the pit, topsoil will be stripped and stockpiled on the well location.
- 3. The excavation will have a firm compacted bottom and sidewalls that are stable for the soil conditions.
- 4. The BGT will be placed in the excavation such that there is a minimum 12 inch free board between the surrounding soils and the tank top. Backfilled soils will be carefully compacted to avoid damaging the tank.
- 5. The buried BGT will be constructed of steel with double-walls and double-bottom, welded following appropriate API and industry codes, coated with an epoxy based paint, covered with a steel #9 mesh screen, and equipped with an EFM to monitor high liquid levels and automatically shut off liquid discharges.
- 6. A solid riser pipe will be installed to allow withdrawal of liquids by suction. The riser will draw from the bottom of the BGT, capped when not in use and sloped to the pit to allow drainage of liquids not collected during withdrawal operations.
- 7. A solid riser pipe will be installed between the interstitial space of the double-walls to allow monthly inspection to determine tank integrity.
- 8. The BGT will be protected from run-on by the construction of a compacted earthen berm.
- 9. Fencing will be constructed to protect livestock/wildlife as specified by the federal Surface Management Agency or, if not federal land/minerals, NMOCD rule 17 requirements.
- 10. WPX will post a well sign in accordance with the federal Surface Management Agency and rule 19.15.3.103.



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

Production Pit: Buried Double-Wall Steel Tank Operations and Maintenance Plan

In accordance with Rule 19.15.17 NMAC, the following plan describes the general operations and maintenance (O&M) of production pits using subgrade tanks on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico. For those production pits which do not conform to this standard O&M plan, a separate well specific O&M plan will be developed and utilized.

- 1. WPX will only allow produced liquids meeting the RCRA exemption for O&G wastes to be stored in the SGT. WPX will not discharge or store any hazardous waste as defined under RCRA 40CFR 261 and 19.15.1.7.W(3) NMAC in any temporary pit.
- 2. Produced water will be disposed by evaporation or transport any of the following NMOCD approved facilities depending on the well location: Basin Disposal, Inc in Bloomfield, New Mexico (Permit # NM-01-005), Williams Rosa SWD#1 (Permit # SWD-916), Williams Rosa #94 (Permit # SWD-758), Burlington Resources Jillson SWD#1 (Permit #R10168A), or other NMOCD approved water disposal facilities.
- 3. WPX shall maintain sufficient freeboard for to prevent overtopping. Discharges to the pit will be shutoff automatically if the high-level alarm is triggered from the EFM or manually if the EFM is not functional.
- 4. Any oil or hydrocarbon collecting on the pit will be removed. Saleable condensate will be returned to the sales tank. Slop oil from compression will be recycled with Safety Kleen, Farmington, NM or Hydropure, Aztec, NM (No Permit Required).
- 5. If the tank integrity is compromised:
  - a. All discharges will be shut off to the pit.
  - b. All liquids will be removed as soon as possible but no more that within 24 hours of discovery
  - c. WPX will notify and report to NMOCD as follows:
  - i. If the release is less than 25 bbls, the Aztec District Office by phone or email within 48-hours of discovery and repair.
  - ii. If the release is suspected to be greater than 25 bbls, the Aztec District Office and the Environmental Bureau Chief by phone for immediate verbal notification pursuant to 19.15.3.116.B (1)(d).
  - d. Written Spill/Release reports will be submitted on Form C-141 per 19.15.3.116.C NMAC within 15 days to the Aztec District Office.
- 6. Berms around the perimeter of the pit shall be maintained as protection from run-on.
- 7. WPX will inspect the SGT pit monthly. Electronic copies of the inspections will be kept at the WPX San Juan Basin office for a minimum of five years following completion. Copies of the inspections will be available to NMOCD upon request.

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

Production Pit: Buried Double-Wall Steel Tank
Closure Plan

In accordance with Rule 19.15.17.13 NMAC, the following plan describes the general closure requirements of below-grade tanks (BGT) on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico. This is WPX's standard closure procedure for all BGTs regulated under Rule 19.15.17 NMAC and operated by WPX. For those closures which do not conform to this standard closure plan, a separate well/pit specific closure plan will be developed and utilized.

#### Closure Conditions and Timing:

Pursuant to 19.15.17.13 (A) NMAC, WPX will initiate closure of any BGT should any one of these conditions occur:

- The Division requires closure because of imminent danger to fresh water, public health or the environment.
- The integrity of the BGT fails. Notification will be within 48 hours to the Division and closure will be schedule as specified in 19.15.17.12 (A)(5) NMAC.
- WPX chooses to take the BGT out-of-service due to operational needs. Closure under these conditions will be closed within 60 days of cessation of the BGT's operation.
- BGTs installed prior to June 16, 2008 that do not meet the requirements under 19.15.17.11.1(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

#### **General Plan Requirements:**

- 1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current surface owner of record. The surface owner of record will be notified of the intent to close the BGT by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner of record will be notified as soon as practical.
- 2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
  - a. Operators Name (WPX)
  - b. Well Name and API Number
  - c. Location (USTR)
- 3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shut in until the rerouting is completed.
- 4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).
- 5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).
- 6. WPX will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of paragraph 1 subsection D of 19.15.9.712 NMAC. Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426.
- 7. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from the location.

8. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(E)(4) NMAC as identified in Table 1. Grab samples will be collected from any area that is wet, discolored or showing other evidence of a release. Results will be reported to the Division following receipt from the lab on Form C-141.

Table 1: Closure Criteria for BGTs

Components	Testing Methods	Closure Limits (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2
BTEX	EPA SW-846 Method 8021B or 8260B	50
TPH	EPA SW-846 Method 418.1 <sup>(1)</sup>	100
Chlorides	EPA SW-846 Method 300.1(1)	250(2)

<sup>(1)</sup> Method modified for solid waste.

- If the Division and/or WPX determine there is a release, WPX will comply with 19.15.3.116
   NMAC and 19.15.1.19 NMAC.
- 10. Upon completion of the tank removal, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot of top soil or background thickness whichever is greater and to existing grade. The surface will be recontoured to match the native grade and prevent ponding.
- 11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (unimpacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. Note: If a surface owner agreement requires reseeding or other surface restoration that do not meet the re-vegetation requirements of 19.15.17.13.1 NMAC then WPX will submit the proposed alternative with written documentation that the surface owner agrees to the alternative, for Division approval.
- 12. For those portions of the former pit area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

### **Closure Report:**

All closure activities will include proper documentation and will be submitted to OCD within 60 days of the BGT closure on a Closure Report using Division Form C-144. The Report will include the following:

- Proof of Closure Notice (surface owner & NMOCD)
- Backfilling & Cover Installation
- Site Diagram with coordinates
- Available Inspection reports

- Confirmation Sampling Analytical
- Disposal Facility Name(s) and Permit Number(s)
- Application Rate & Seeding techniques
- Photo Documentation of Reclamation

<sup>(2)</sup> If background concentration of Chlorides greater than 250 mg/Kg, then higher concentration will be used for closure.

## Hydrogeological Report Williams Production Company, LLC Rosa Unit #151 Regional Hydrological Context

### **Referenced Well Location:**

The referenced well and pit is located on Bureau of Land Management land within Farmington Field Office (BLM-FFO) jurisdiction in San Juan County, New Mexico. This site is positioned in the northeastern portion of the San Juan Basin, an asymmetrical syncline that extends from northwestern New Mexico into southwestern Colorado (Carson National Forest DEIS, 2007). Elevation of the referenced well is approximately 6458 feet MSL.

### **General Regional Groundwater Description:**

As a portion of the San Juan Basin, the FFO 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 the northeastern part of the San Juan Basin, 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.

**Site Specific Information:** 

Surface Hydrology: The pit is located on a broad, fairly level mid-slope with an

eastern aspect. Drainage is through unnamed drainages into the

Navajo Reservoir, and into the San Juan River.

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 more than 100 feet bgs.

Within a one-mile radius of this location, there are no iWATERS wells. However, cathodic data associated with the Rosa Unit 151 wellsite shows a depth to moisture at 190 feet and Rosa #117 (approximately 858 feet from pit) at 80 feet (see Siting

Criteria Map I for details).

### **References:**

Allen, Erin. Undated. Colorado Plateau Aquifers.

http://academic.emporia.edu/schulmem/hydro/TERM%20PROJECTS/2007/Allen/Aquifer.html.

New Mexico Energy, Minerals and Natural Resources Department, Division of Mining and Minerals. Database. 2009. Internet accessed February 2009.

New Mexico Office of the State Engineer. 2010. iWaters database. Internet accessed July, 2010.

New Mexico WQCC. 2005. State of New Mexico Water Quality Act and the Water Control Commission Regulations.

United States Department of Agriculture, Forest Service. 2008. Final 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.



# New Mexico Office of the State Engineer Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE)

		(quarters are smallest to largest) (					o larg	est)	(NADS3 UTN	) (In feet)			
	Sub		Q	Q	Q				•	1	Depth:D	epth	Water
POD Number	basin Use	County	64	16	· 4	Sec	Tws	Rng	<u>,X</u>	<u></u>	Wellin	later	Column
SJ 01949	SUB	SJ	3	2	2	10	32 <sub>N</sub>	06W	252909	4097594*	300	260	40
SJ 01957	SAN	SJ	3	2	2	1·D	32N	06W	282909	4097594*	280	26D	G
SJ 02711	DOM	l SJ	3.	1	3	11	32 <sub>N</sub>	06W	283293	4096778*	200	120	80
SJ 03065	DGM	l SJ	2	2	i	20	32N	06W	278939	4094857*	290	100	190
SJ 03135	DOM	l SJ	1	1	3	09	32N	06W	280044	4097112*	200		
SJ 03302	EXP	SJ	4	3	i	80	32 <sub>1</sub> N	06W	275635	4097294"	250		
SJ 03420	DOM	l SJ		2	4	19	32N	06W	277997	4093753*	415	6D	355
SJ 03775 PGD1	EXP	SJ	3	3	1	08	32N	06W	278389	4097289	260	200	60
									Avera	ege Depth to	Water.	170	feet
										Minimum	n Depth:	60	f <del>ee</del> t
										Maximum	. Depti:	280	feet

Record Count: 8

PLSS Search:

Township: 32N Range: 06W

\*UTM location was derived from PLSS - eae Help

The data is furnished by the NMOSEISC 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.

7/27/10 9:59 AM

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WATER COLUMN/ AVERAGE DEPTH TO WATER



## New Mexico Office of the State Engineer Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE)

			(quarte	rs a	re s	ma	allest	to larg	est)	(NAD83 UT	'M in meters)		(In feet)	ı
,	Sub			Q.	o	Q			,			Depth	Depth W	/ateř
POD Number	basin	Use	County	64	16	4	Sec	Tws	Rng	X	Y	Well	WaterCo	lumn
SJ 00011		IND	RA				32	31N	06W	278321	4081811'	610		
SJ 03685 POD1		DOM	SJ	4	2	i	07	31N	06W	276814	4988772'	460	310	150
										Ave	rage Depth to	) Water	: 310 fe	eŧ
											Minimum	n Depth	: 310 fe	eŧ
											Maximum	Depth	: 310 fe	et

Record Count: 2

PLSS Search:

Township: 31N Range: 06W

\*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.

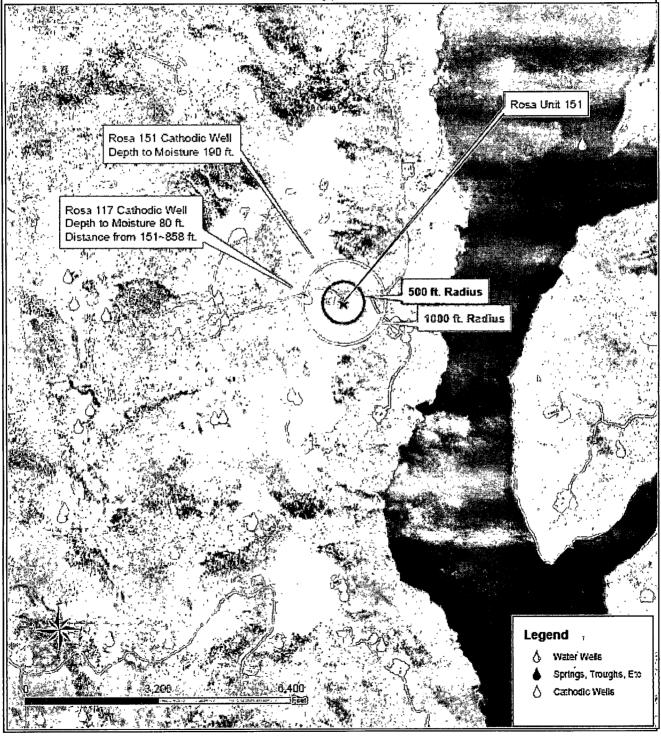
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Page 1 of 1

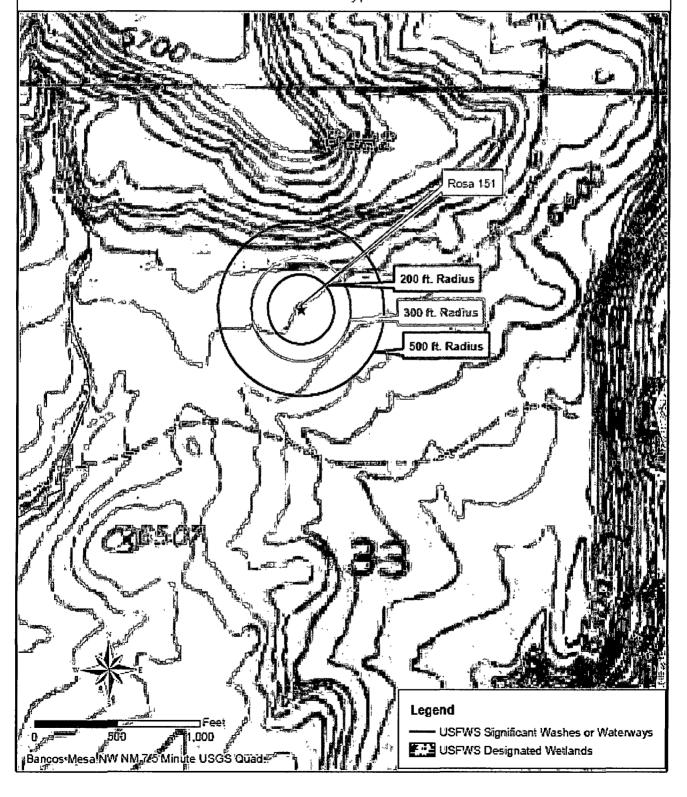
WATER COLUMN/ AVERAGE DEPTH TO WATER

Page 14 of 19 Rosa Unit #151

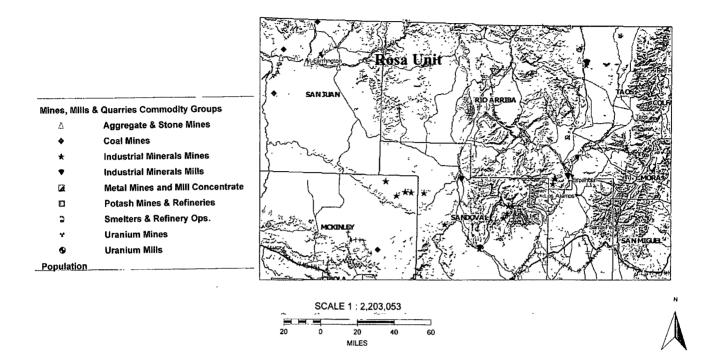
Siting Criteria Map I Water Wells, Cathodic Wells, & Springs Williams Production Company, LLc Rosa Unit No. 151 T32N, R6W, Section 33 NMPM San Juan County, New Mexico



Siting Criteria Map II Topographic Features Williams Production Company, LLC Rosa Unit No. 151 T32N, R06W, Section 33 NMPM San Juan County, New Mexico



### **MMQonline Public Version**



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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 #151 well 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.

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