

District I
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

Form C-144
July 21, 2008

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

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

4088
Type of action: ☐ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
☒ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
☐ Modification to an existing permit
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances

1
Operator WILLIAMS FORD CORNERS, LLC OGRID # _____
Address: 188 CR 4900 BLOOMFIELD, NM 87413
Facility or well name RICHARDSON #12A
API Number 3004524880 OCD Permit Number _____
U/L or Qtr/Qtr J Section 15 Township 31N Range 12W County _____
Center of Proposed Design Latitude _____ Longitude _____ NAD: ☐ 1927 ☐ 1983
Surface Owner ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2
☐ **Pit:** Subsection F or G of 19 15 17 11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ Lined ☐ Unlined Liner type Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____ bbl Dimensions L _____ x W _____ x D _____

3
☐ **Closed-loop System:** Subsection H of 19 15 17 11 NMAC
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other _____
☐ Lined ☐ Unlined Liner type Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
Liner Seams ☐ Welded ☐ Factory ☐ Other _____

4
☒ **Below-grade tank:** Subsection I of 19 15 17 11 NMAC
Volume 25 bbl Type of fluid DEHY FLUIDS (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 NA
Liner type Thickness NA mil ☐ HDPE ☐ PVC ☐ Other _____

5
☐ **Alternative Method:**
Submittal of an exception request is required Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval



Fencing: Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)

- ☐ Cham 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 _____

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)

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

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

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

| | |
|--|--|
| Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - NM Office of the State Engineer - iWATERS database search, USGS, Data obtained from nearby wells | |
| 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). | <input type="checkbox"/> Yes <input type="checkbox"/> 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 (<i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i>) | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - Visual inspection (certification) of the proposed site, Aerial photo, Satellite image | <input type="checkbox"/> NA |
| Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application (<i>Applies to permanent pits</i>) | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - Visual inspection (certification) of the proposed site, Aerial photo, Satellite image | <input type="checkbox"/> NA |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - Written confirmation or verification from the municipality, Written approval obtained from the municipality | |
| Within 500 feet of a wetland. | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed site | |
| Within the area overlying a subsurface mine | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | |
| Within an unstable area | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - Engineering measures incorporated into the design, NM Bureau of Geology & Mineral Resources, USGS, NM Geological Society, Topographic map | |
| Within a 100-year floodplain | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - FEMA map | |

11

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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

12.

Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number _____

☐ Previously Approved Operating and Maintenance Plan API Number _____ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including 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

14

Proposed Closure: 19.15.17.13 NMAC**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Closed-loop System

☐ Alternative

Proposed Closure Method: ☒ Waste Excavation and Removal

☐ Waste Removal (Closed-loop systems only)

☐ On-site Closure Method (Only for temporary pits and closed-loop systems)

☐ In-place Burial ☐ On-site Trench Burial

☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

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

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- ☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- ☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- ☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19 15 17 13 D NMAC)**Instructions:** Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name _____ Disposal Facility Permit Number _____

Disposal Facility Name _____ Disposal Facility Permit Number _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?
☐ Yes (If yes, please provide the information below) ☐ No
Required for impacted areas which will not be used for future service and operations:

- ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19 15 17 13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19 15 17 13 NMAC

17.

Siting Criteria (regarding on-site closure methods only): 19 15 17.10 NMAC**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

| | |
|---|--|
| Ground water is less than 50 feet below the bottom of the buried waste. | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - NM Office of the State Engineer - iWATERS database search, USGS; Data obtained from nearby wells | <input type="checkbox"/> NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - NM Office of the State Engineer - iWATERS database search, USGS; Data obtained from nearby wells | <input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - NM Office of the State Engineer - iWATERS database search, USGS; Data obtained from nearby wells | <input type="checkbox"/> NA |
| Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark) | <input type="checkbox"/> Yes <input type="checkbox"/> 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - 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. | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - NM Office of the State Engineer - iWATERS database, 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 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - Written confirmation or verification from the municipality; Written approval obtained from the municipality | |
| Within 500 feet of a wetland | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | |
| Within the area overlying a subsurface mine. | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | |
| Within an unstable area | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - Engineering measures incorporated into the design, NM Bureau of Geology & Mineral Resources, USGS, NM Geological Society; Topographic map | |
| Within a 100-year floodplain. | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| - FEMA map | |

18

On-Site Closure Plan Checklist: (19 15.17 13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19 15 17 10 NMAC
- ☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19 15 17 13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19 15 17 11 NMAC
- ☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17 11 NMAC
- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15 17 13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19 15 17 13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19 15 17 13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19 15.17 13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19 15 17 13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15 17 13 NMAC

Operator Application Certification:

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

Name (Print). _____ Title _____

Signature _____ Date _____

e-mail address _____ Telephone _____

OCD Approval: ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: Jonathan D. Kelly Approval Date: 10/27/2011

Title: Compliance Officer OCD Permit Number: _____

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: 4/19/2011

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

Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:

Instructions: Please identify 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

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). MARK HARVEY, ON BEHALF OF WILLIAMS Title: PROJECT COORDINATOR

Signature M. Harvey Date 4-29-11

e-mail address. markh@ditell.com Telephone 505-402-1958

COPY



Environmental Services
188 CR 4900
Bloomfield, NM 87413

April 2, 2011

Mr. Mark Kelly
USBLM – Farmington District
1235 La Plata Highway, Suite A
Farmington, NM 8701

RE: NOTICE OF BELOW GRADE TANK CLOSURES

Dear Mr. Kelly:

Pursuant to the requirements of the New Mexico Oil Conservation Division (OCD), Williams hereby provides notice of the intent to retire and close the below grade tank (BGT) at the following locations:

| | | |
|----------------------|--------------------|------------------|
| Sadie West #1A | Unit C, 21-31N-12W | API # 3004522915 |
| Culpepper Martin #8A | Unit I, 19-32N-12W | API # 3004523334 |
| Richardson #12A | Unit J, 15-31N-12W | API # 3004521880 |

The below grade tank at each location had been used to capture liquids from dehydrator discharge(s).

The tanks are now out of service and will be closed consistent with the Williams Closure Plan for Below Grade Tanks approved by the OCD. A copy of the plan was previously provided to your office. Field work is scheduled to commence April 12, 2011.

If you have any questions regarding the nature and extent of work, or the exact field schedule, please call Aaron Dailey at (505) 634-4708 or I may be reached at 801-232-8985.

Respectfully,

Mark Harvey
Project Coordinator

I DO HEREBY CERTIFY that this document was sent by CERTIFIED MAIL to the named recipient at the address above on _____. By _____



Williams Four Corners, LLC

Closure Plan for Below Grade Tanks

San Juan Basin – New Mexico

Background

Following promulgation of 19.15.17 NMAC also known as the Pit Rule, Williams has developed this Closure Plan to comply with requirements related to the retirement of certain below grade tanks (BGTs). The plan will be used when closing BGT locations near term, and for all BGTs which are required to be closed by June 15, 2013. This plan shall also be used when closing any other BGT operated by Williams.

Certain below grade tanks targeted under this closure plan were, in some cases, installed subsequent to earthen pit closures and were constructed in conformance with NMOCD approved criteria. All BGTs have been operating in general compliance with NMOCD regulations developed prior to the new Pit Rule of June 2008.

Applicability

This plan shall be implemented when any BGT is retired or removed from service due to operational considerations or when tank integrity is compromised beyond repair. Closure shall commence within 60 days of cessation of use or sooner if directed by NMOCD.

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 be retrofitted to meet current design standards. In any event, all single walled tanks without completely visible sidewalls shall be closed by June 15, 2013 in accordance with the provisions herein.

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 NMOCD Aztec Office 3-7 days before work is scheduled. In addition, the landowner of record (obtained through county tax records) will be notified in advance by certified mail with return receipt. 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. Notification to NMOCD will be made via email or by phone. If prudent, and contingent upon work schedules and manpower assignments, more than one location may be included in a single communication.

Discharge to the BGT will be eliminated and all piping removed or re-routed as appropriate. The liquid contents in the tank will be removed and shipped for disposal at an NMOCD approved and permitted facility. 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.

The table below provides a list of waste materials and the facility proposed for disposal or recycling:

Table 1

| | |
|--|--|
| 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

Permit Numbers and additional approved facilities are listed on the attached spreadsheet.

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 CO Facility).

Steel or fiberglass tanks will be removed and shipped to a Williams storage yard where the condition of each tank will be evaluated for recycling, reuse, or disposal, subject to NMOCD approval. 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). Additional grab samples will be collected if there is obvious staining, or when wet or discolored soil exists, or if there is other evidence of soil impact(s). 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. Depending on site conditions and operating needs, the backfilled area will be reclaimed with prescribed topsoil and reseeded.

If NMOCD or Williams determines a release event has occurred, Williams will comply with 19.15.29 and / or 19.15.30 as appropriate. If analyses of soils excavated in conjunction with the BGT removal should reveal contaminant concentrations at or below specified closure limits (see Table 2 below), then the soil may be returned to the excavation and covered with prescribed soil cover. Sampling of the excavated material is detailed in the Sampling and Laboratory Analyses section later in this plan.

Due to the fact that most 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.

Restoration efforts shall incorporate proper contouring as described in the Pit Rule and shall be constructed in a manner to prevent ponding and erosion, using drainage controls such as water bars and/or silt traps as appropriate. Soil cover (suitable for vegetative growth) will be equivalent to the background thickness of topsoil or 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 and shall effect cover equaling 70% of native perennial vegetation. Re-vegetation shall establish at least three native plant species, including at least one grass, but not including any noxious weeds, through two successive growing seasons. Seeding will be accomplished by drilling on the contour whenever practicable or by other NMOCD approved methods.

Seeding efforts will be initiated during the first growing season after closure work is approved and be repeated until re-vegetation is successful. Notification will be made to NMOCD anytime seeding efforts begin and when successful re-vegetation is sustained. Adverse growing conditions (e.g. drought, etc.) may cause delay until conditions are more favorable or necessitate enhanced cultivation techniques (e.g. mulching, irrigating, etc.) as approved by NMOCD.

Sampling and Laboratory Analyses

A minimum five point composite sample shall be collected from the soils beneath the below grade tank and one or more grab samples from each area that is wet, discolored or showing other evidence of a release. Sampled soil will be placed in clean glass jars and cooled and maintained at 39°F. Samples will be packaged and shipped under 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. The following table lists the contaminants of concern, testing methods, and the closure limits defining action levels:

Table 2

| Contaminant | Test 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 | Method 418.1++ | 100 |
| Chlorides | EPA SW-846 Method 300.1 | 250* |

** Or background concentration – whichever is greater*

In the event soil is found to have contaminants in excess of the action levels above, requirements of 19 15 29 NMAC and 19 15 30 NMAC shall dictate further actions. Such action would likely include development of a Remedial Action Plan or Abatement Plan as specified under those Rules.
++ Not currently used USEPA Method (Replaced by Method 1664). Method 418.1 is required by NMOCD

Sampling of any excavated or stockpiled material 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 25 cubic yards of soil (i.e. one fraction from each cubic yard). 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 division and surface owner(s)
- 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.



Williams Four Corners, LLC

Closure Plan for Below Grade Tanks

San Juan Basin – New Mexico

Background

Following promulgation of 19.15.17 NMAC also known as the Pit Rule, Williams has developed this Closure Plan to comply with requirements related to the retirement of certain below grade tanks (BGTs). The plan will be used when closing BGT locations near term, and for all BGTs which are required to be closed by June 15, 2013. This plan shall also be used when closing any other BGT operated by Williams.

Certain below grade tanks targeted under this closure plan were, in some cases, installed subsequent to earthen pit closures and were constructed in conformance with NMOCD approved criteria. All BGTs have been operating in general compliance with NMOCD regulations developed prior to the new Pit Rule of June 2008.

Applicability

This plan shall be implemented when any BGT is retired or removed from service due to operational considerations or when tank integrity is compromised beyond repair. Closure shall commence within 60 days of cessation of use or sooner if directed by NMOCD.

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 be retrofitted to meet current design standards. In any event, all single walled tanks without completely visible sidewalls shall be closed by June 15, 2013 in accordance with the provisions herein.

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 NMOCD Aztec Office 3-7 days before work is scheduled. In addition, the landowner of record (obtained through county tax records) will be notified in advance by certified mail with return receipt. 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. Notification to NMOCD will be made via email or by phone. If prudent, and contingent upon work schedules and manpower assignments, more than one location may be included in a single communication.

Discharge to the BGT will be eliminated and all piping removed or re-routed as appropriate. The liquid contents in the tank will be removed and shipped for disposal at an NMOCD approved and permitted facility. 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.

The table below provides a list of waste materials and the facility proposed for disposal or recycling:

Table 1

| | |
|--|--|
| 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

Permit Numbers and additional approved facilities are listed on the attached spreadsheet.

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 CO Facility).

Steel or fiberglass tanks will be removed and shipped to a Williams storage yard where the condition of each tank will be evaluated for recycling, reuse, or disposal, subject to NMOCD approval. 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). Additional grab samples will be collected if there is obvious staining, or when wet or discolored soil exists, or if there is other evidence of soil impact(s). 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. Depending on site conditions and operating needs, the backfilled area will be reclaimed with prescribed topsoil and reseeded.

If NMOCD or Williams determines a release event has occurred, Williams will comply with 19.15.29 and / or 19.15.30 as appropriate. If analyses of soils excavated in conjunction with the BGT removal should reveal contaminant concentrations at or below specified closure limits (see Table 2 below), then the soil may be returned to the excavation and covered with prescribed soil cover. Sampling of the excavated material is detailed in the Sampling and Laboratory Analyses section later in this plan.

Due to the fact that most 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.

Restoration efforts shall incorporate proper contouring as described in the Pit Rule and shall be constructed in a manner to prevent ponding and erosion, using drainage controls such as water bars and/or silt traps as appropriate. Soil cover (suitable for vegetative growth) will be equivalent to the background thickness of topsoil or 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 and shall effect cover equaling 70% of native perennial vegetation. Re-vegetation shall establish at least three native plant species, including at least one grass, but not including any noxious weeds, through two successive growing seasons. Seeding will be accomplished by drilling on the contour whenever practicable or by other NMOCD approved methods.

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Sampling and Laboratory Analyses

A minimum five point composite sample shall be collected from the soils beneath the below grade tank and one or more grab samples from each area that is wet, discolored or showing other evidence of a release. Sampled soil will be placed in clean glass jars and cooled and maintained at 39°F. Samples will be packaged and shipped under 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. The following table lists the contaminants of concern, testing methods, and the closure limits defining action levels:

Table 2

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** Or background concentration – whichever is greater.*

In the event soil is found to have contaminants in excess of the action levels above, requirements of 19 15 29 NMAC and 19 15 30 NMAC shall dictate further actions. Such action would likely include development of a Remedial Action Plan or Abatement Plan as specified under those Rules
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All closure activities will be properly documented and include preparation of Form C-144 which shall be submitted to the NMOCDC 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 division and surface owner(s)
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- 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.

| Permit No. | Company Name | Effective | County | Facility Name | Locals |
|------------|---|------------|------------|---|----------------|
| 19 | GANDY MARLEY INC | 10/06/1994 | Chaves | GANDY MARLEY LANDFARM | -4-11 S-31 E |
| 28 | OLD LOCO OIL CO | 07/02/1985 | Eddy | OLD LOCO TREATING PLANT | -19-17 S-31 E |
| 43 | Loco Hills Landfarm LLC | 11/08/2004 | Eddy | Loco Hills Landfarm | m-32-16 S-30 E |
| 4 | LOCO HILLS WATER DISPOSAL | 10/30/1981 | Eddy | LOCO HILLS WATER DISPOSAL | M-16-17 S-30 E |
| 38 | OK HOT OIL SERVICE INC | 08/16/2000 | Eddy | OK HOT OIL SERVICES INC | O-14-17 S-28 E |
| 24 | CHAPARRAL SWD | 01/31/1995 | Lea | CHAPARRAL TREATING PLANT | B-17-23 S-37 E |
| 35 | LEA LAND INC | 01/05/2000 | Lea | LEA LAND LANDFILL | -32-20 S-32 E |
| 12 | C&C LANDFARM INC | 11/16/1992 | Lea | C&C LANDFARM | B-3-20 S-37 E |
| 13 | ENVIRONMENTAL PLUS INC | 02/16/1993 | Lea | ENVIRONMENTAL PLUS LANDFARM | -14-22 S-37 E |
| 15 | GOO YEA LANDFARM INC | 11/16/1982 | Lea | GOO YEA LANDFARM | -14-11 S-38 E |
| 23 | J&L LANDFARM INC | 05/10/1998 | Lea | J&L LANDFARM | -9-20 S-38 E |
| 25 | GANDY CORP | 06/27/1973 | Lea | Gandy Corp. Treating Plant | -11-10 S-35 E |
| 26 | JENEX OPERATING CO | 09/21/1983 | Lea | JENEX TREATING PLANT | D-14-20 S-38 E |
| 30 | ARTESIA AERATION LLC | 06/29/1999 | Lea | ARTESIA AERATION LANDFARM | -7-17 S-32 E |
| 32 | SOUTH MONUMENT SURFACE WASTE FACILITY LLC | 10/04/1999 | Lea | SOUTH MONUMENT LANDFARM | A-25-38 S-20 E |
| 33 | DOOM LANDFARM | 04/03/2000 | Lea | DOOM LANDFARM | g-5-26 S-37 E |
| 34 | DD LANDFARM INC | 04/12/2000 | Lea | DD LANDFARM | -31-21 S-38 E |
| 21 | RHINO OILFIELD DISPOSAL INC | 11/17/1997 | Lea | RHINO OILFIELD LANDFARM | -34-20 S-38 E |
| 44 | COMMERCIAL EXCHANGE, INC. | 11/01/2004 | Lea | Blackwater Oil Reclamation Facility | d-1-25 S-37 E |
| 39 | PITCHFORK LANDFARM LLC | 10/30/2002 | Lea | PITCHFORK LANDFARM | A-5-24 S-34 E |
| 8 | CONTROLLED RECOVERY INC | 04/27/1990 | Lea | CONTROLLED RECOVERY | -27-20 S-32 E |
| 42 | COMMERCIAL EXCHANGE, INC. | 07/22/2004 | Lea | Blackwater Landfarm | f-1-25 S-37 E |
| 38 | SAUNDERS LANDFARM LLC | 10/28/2002 | Lea | SAUNDERS LANDFARM | M-7-14 S-34 E |
| 41 | LAZY ACE LANDFARM LLC | 03/09/2004 | Lea | LAZY ACE LANDFARM | M-22-20 S-34 E |
| 3 | SUNDANCE SERVICES, INC. | 08/30/1977 | Lea | SUNDANCE PARABO | m-29-21 S-38 E |
| 37 | COMMERCIAL EXCHANGE, INC. | 03/31/2003 | Lea | COMMERCIAL SURFACE WM FACILITY | A-1-20 S-36 E |
| 8 | T-N-T ENVIRONMENTAL INC | 01/19/1987 | Rio Arriba | TNT EVAP POND/LANDFARM | -8-25 N-3 W |
| 11 | ENVIROTECH INC | 07/07/1992 | San Juan | ENVIROTECH LANDFARM #2 | -8-26 N-10 W |
| 9 | KEY FOUR CORNERS INC | 04/02/1991 | San Juan | KEY EVAP POND and Landfarm | E-2-29 N-12 W |
| 10 | JFJ LANDFARM LLC | 07/22/2002 | San Juan | JFJ Land Farm Crouch Mesa (Formerly Tierra) | J-2-29 N-12 W |
| 6 | BASIN DISPOSAL INC | 10/16/1987 | San Juan | BASIN DISPOSAL EVAP. POND | F-3-29 N-11 W |

Assess.

ANALYTICAL RESULTS

Project: NM SJA BGTS
Pace Project No.: 6096081

RICHARDSON #12A

Sample: 161028MAR11 Lab ID: 6096081004 Collected: 03/28/11 16:10 Received: 03/29/11 09:45 Matrix: Solid

Results reported on a "dry-weight" basis

| Parameters | Results | Units | Report Limit | DF | Prepared | Analyzed | CAS No. | Qual |
|--------------------------------|---------|--|--------------|----|----------------|----------------|------------|------|
| 8260 MSV 5035A VOA | | Analytical Method: EPA 8260 | | | | | | |
| Benzene | ND | ug/kg | 5.5 | 1 | | 03/30/11 15:07 | 71-43-2 | |
| Ethylbenzene | ND | ug/kg | 5.5 | 1 | | 03/30/11 15:07 | 100-41-4 | |
| Toluene | ND | ug/kg | 5.5 | 1 | | 03/30/11 15:07 | 108-88-3 | |
| Xylene (Total) | ND | ug/kg | 5.5 | 1 | | 03/30/11 15:07 | 1330-20-7 | |
| Dibromofluoromethane (S) | 105 | % | 68-129 | 1 | | 03/30/11 15:07 | 1868-53-7 | |
| Toluene-d8 (S) | 97 | % | 81-121 | 1 | | 03/30/11 15:07 | 2037-26-5 | |
| 4-Bromofluorobenzene (S) | 102 | % | 75-131 | 1 | | 03/30/11 15:07 | 460-00-4 | |
| 1,2-Dichloroethane-d4 (S) | 111 | % | 77-131 | 1 | | 03/30/11 15:07 | 17060-07-0 | |
| Percent Moisture | | Analytical Method: ASTM D2974-87 | | | | | | |
| Percent Moisture | 10.1 | % | 0.50 | 1 | | 03/30/11 00:00 | | |
| 9071 HEM TPH in Soil | | Analytical Method: EPA 9071B Preparation Method: EPA 9071B | | | | | | |
| Total Petroleum Hydrocarbons | ND | mg/kg | 278 | 1 | 03/31/11 00:00 | 03/31/11 00:00 | | |
| 300.0 IC Anions 28 Days | | Analytical Method: EPA 300.0 | | | | | | |
| Chloride | ND | mg/kg | 220 | 20 | | 04/04/11 16:04 | 16887-00-6 | 1e |

QUALITY CONTROL DATA

Project: NM SJA BGTS
Pace Project No : 6096081

| | | | |
|------------------------|--|----------------------|----------------------------------|
| QC Batch | MSV/36048 | Analysis Method | EPA 8260 |
| QC Batch Method | EPA 8260 | Analysis Description | 8260 MSV 5035A Volatile Organics |
| Associated Lab Samples | 6096081001, 6096081002, 6096081003, 6096081004 | | |

METHOD BLANK 791711 Matrix: Solid

Associated Lab Samples: 6096081001, 6096081002, 6096081003, 6096081004

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|---------------------------|-------|--------------|-----------------|----------------|------------|
| Benzene | ug/kg | ND | 5.0 | 03/30/11 11:19 | |
| Ethylbenzene | ug/kg | ND | 5.0 | 03/30/11 11:19 | |
| Toluene | ug/kg | ND | 5.0 | 03/30/11 11:19 | |
| Xylene (Total) | ug/kg | ND | 5.0 | 03/30/11 11:19 | |
| 1,2-Dichloroethane-d4 (S) | % | 108 | 77-131 | 03/30/11 11:19 | |
| 4-Bromofluorobenzene (S) | % | 102 | 75-131 | 03/30/11 11:19 | |
| Dibromofluoromethane (S) | % | 103 | 68-129 | 03/30/11 11:19 | |
| Toluene-d8 (S) | % | 97 | 81-121 | 03/30/11 11:19 | |

LABORATORY CONTROL SAMPLE 791712

| Parameter | Units | Spike Conc. | LCS Result | LCS % Rec | % Rec Limits | Qualifiers |
|---------------------------|-------|-------------|------------|-----------|--------------|------------|
| Benzene | ug/kg | 100 | 98.6 | 99 | 84-119 | |
| Ethylbenzene | ug/kg | 100 | 103 | 103 | 80-120 | |
| Toluene | ug/kg | 100 | 93.6 | 94 | 83-117 | |
| Xylene (Total) | ug/kg | 300 | 292 | 97 | 80-120 | |
| 1,2-Dichloroethane-d4 (S) | % | | | 107 | 77-131 | |
| 4-Bromofluorobenzene (S) | % | | | 103 | 75-131 | |
| Dibromofluoromethane (S) | % | | | 108 | 68-129 | |
| Toluene-d8 (S) | % | | | 99 | 81-121 | |

QUALITY CONTROL DATA

Project NM SJA BGTS

Pace Project No. 6096081

| | | | |
|------------------------|--|----------------------|-----------------------------|
| QC Batch: | PMST/6002 | Analysis Method | ASTM D2974-87 |
| QC Batch Method | ASTM D2974-87 | Analysis Description | Dry Weight/Percent Moisture |
| Associated Lab Samples | 6096081001, 6096081002, 6096081003, 6096081004 | | |

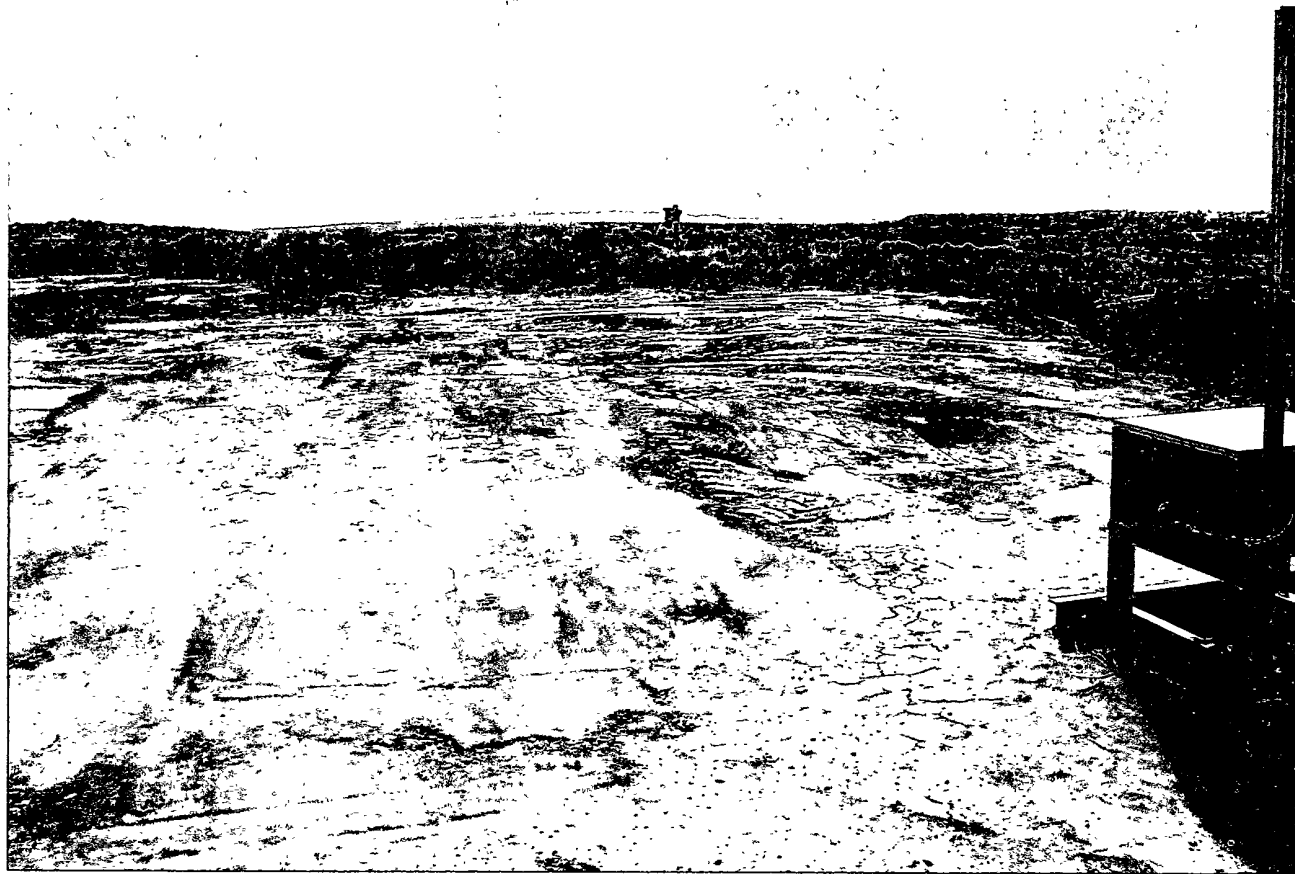
| | | | |
|------------------------|--|--------|-------|
| METHOD BLANK | 791680 | Matrix | Solid |
| Associated Lab Samples | 6096081001, 6096081002, 6096081003, 6096081004 | | |

| Parameter | Units | Blank Result | Reporting Limit | Analyzed | Qualifiers |
|------------------|-------|--------------|-----------------|----------------|------------|
| Percent Moisture | % | ND | 0.50 | 03/30/11 00 00 | |

SAMPLE DUPLICATE 791681

| Parameter | Units | 6095708024 Result | Dup Result | RPD | Max RPD | Qualifiers |
|------------------|-------|-------------------|------------|-----|---------|------------|
| Percent Moisture | % | 10.6 | 8.6 | 21 | 20 | R2 |

RICHARDSON #12A



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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in
accordance with 19 15 29 NMAC

Release Notification and Corrective Action

OPERATOR



Initial Report



Final Report

| | | | |
|-----------------|----------------------------|---------------|----------------|
| Name of Company | WILLIAMS FOUR CORNERS, LLC | Contact | DANELL ZAWASKI |
| Address | 188 CR 4900 BLOOMFIELD, NM | Telephone No. | 505-634-4951 |
| Facility Name | RICHARDSON 12A | Facility Type | WELL |

| | | | | | |
|---------------|-----|---------------|--|---------|------------|
| Surface Owner | BLM | Mineral Owner | | API No. | 3004521880 |
|---------------|-----|---------------|--|---------|------------|

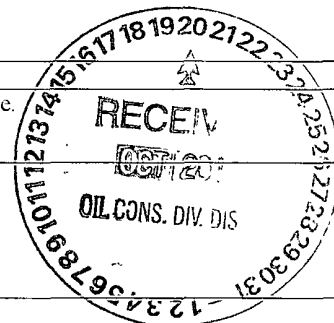
LOCATION OF RELEASE

| | | | | | | | | |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|----------|
| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County |
| J | 15 | 31N | 12W | | | | | SAN JUAN |

Latitude _____ Longitude _____

NATURE OF RELEASE

| | | | | | |
|-----------------------------|--|---|------------|----------------------------|------|
| Type of Release | DEHY DISCHARGE | Volume of Release | UNK < 138L | Volume Recovered | NONE |
| Source of Release | DEHY LIQUID CONTAINMENT | Date and Hour of Occurrence | | Date and Hour of Discovery | |
| Was Immediate Notice Given? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not Required | If YES, To Whom? | | | |
| By Whom? | | Date and Hour | | | |
| Was a Watercourse Reached? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If YES, Volume Impacting the Watercourse. | | | |



| | |
|---|--|
| If a Watercourse was Impacted. Describe Fully * | |
|---|--|

| |
|--|
| Describe Cause of Problem and Remedial Action Taken * |
| DEHY LIQUIDS (WATER + CONDENSATE) OUTSIDE BGT - RELEASE ATTRIBUTABLE TO OVERFLOW INTO SECONDARY CONTAINMENT OR WIND/WAVE ACTION, OVERSPRAY OR BOTH |

| |
|---|
| Describe Area Affected and Cleanup Action Taken * |
| AREA AROUND - BENEATH BGT - EXCAVATE CONTAMINATED SOIL - LANDFARM |

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 | Approved by Environmental Specialist: | | |
| Title | Approval Date | Expiration Date. | |
| E-mail Address | Conditions of Approval | | Attached <input type="checkbox"/> |
| Date | Phone | | |

* Attach Additional Sheets If Necessary



Williams Four Corners, LLC
Below Grade Tank Closure Report

Well Name: RICHARDSON 12A
API Number: 3004521880

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

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

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

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

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

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

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

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

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

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

Action: Contaminated soil was either hauled to a NMOCD approved land farm (identified in the approved BGT Closure Plan) or it was land farmed and or mixed with clean soil to meet acceptable action levels for contaminants of concern (COC)

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

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

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

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

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



Environmental Services
188 CR 4900
Bloomfield, NM 87413

April 4, 2011

Mr. Brandon Powell
1000 Rio Brazos Road
Aztec, NM 87410

RE: NOTICE OF BELOW GRADE TANK CLOSURES

Dear Mr. Powell

Williams hereby provides notice of the intent to retire and close the below grade tank (BGT) at the following well sites:

| | | |
|----------------------------|--------------------|------------------|
| Sadie West #1A | Unit C, 21-31N-12W | API # 3004522915 |
| Culpepper Martin #8A | Unit I, 19-32N-12W | API # 3004523334 |
| Richardson #12A | Unit J, 15-31N-12W | API # 3004521880 |

Each below grade tank had been used to capture liquids from dehydrator discharge(s)

The tanks are now out of service and will be closed consistent with the Williams Closure Plan for Below Grade Tanks (BGT) approved by the OCD. Work is scheduled to commence April 12th, weather permitting

At locations where contaminated soil is discovered, that soil will be excavated to the extent where additional soil sampling reveals TPH, BTEX, and total chloride levels are acceptable. Excavated soil will then be land-farmed or otherwise treated on site, or be hauled to an OCD approved commercial land-farm.

Where bedrock is reached or when excavation limits compromise production equipment integrity or worker safety, excavation will be terminated. After confirmation soil sampling of the excavation reveals satisfactory results, backfilling will occur using soil meeting clean criteria. The excavated area will then be returned to surrounding grade. Further soil contouring and overall site reclamation will be consistent with the Williams BGT Closure Plan mentioned above. Site specific details will be provided in the C-144 Closure Report to be submitted for each location.

If you have any questions regarding the nature and extent of work, please call Aaron Dailey at (505) 632-4708 or I can be reached at 801-232-8985.

Respectfully,

COPY

Mark Harvey
Project Coordinator

Cc: Aaron Dailey – WFS FCA



Environmental Services
188 CR 4900
Bloomfield, NM 87413

April 2, 2011

Mr. Mark Kelly
USBLM – Farmington District
1235 La Plata Highway, Suite A
Farmington, NM 8701

RE: NOTICE OF BELOW GRADE TANK CLOSURES

Dear Mr. Kelly:

Pursuant to the requirements of the New Mexico Oil Conservation Division (OCD), Williams hereby provides notice of the intent to retire and close the below grade tank (BGT) at the following locations:

| | | |
|------------------------|--------------------|------------------|
| Sadie West #1A | Unit C, 21-31N-12W | API # 3004522915 |
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| <u>Richardson #12A</u> | Unit J, 15-31N-12W | API # 3004521880 |

The below grade tank at each location had been used to capture liquids from dehydrator discharge(s).

The tanks are now out of service and will be closed consistent with the Williams Closure Plan for Below Grade Tanks approved by the OCD. A copy of the plan was previously provided to your office. Field work is scheduled to commence April 12, 2011

If you have any questions regarding the nature and extent of work, or the exact field schedule, please call Aaron Dailey at (505) 634-4708 or I may be reached at 801-232-8985.

Respectfully,

Mark Harvey
Project Coordinator

I DO HEREBY CERTIFY that this document was sent by CERTIFIED MAIL to the named recipient at the address above on _____ By _____



Environmental Services
188 CR 4900
Bloomfield, NM 87413

October 25, 2011

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

RE: BGT CLOSURE DOCUMENTATION

Dear Mr. Kelly:

Enclosed please find additional documentation to supplement previously submitted BGT Closure Reports. The additional documents are provided in response to your recent telephone call. In particular, copies of notification letters for three sites are part of this submittal.

Also, be advised that closure of the BGT at the Richardson #12A site occurred on April 19, 2011.

With the additional documentation, it is believed that Williams has satisfied the reporting requirement for BGT closures.

If you have any questions or need any additional information, please call me at (801) 232-8985 or Danell Zawaski at (505) 634-4951.

Respectfully,

Mark Harvey
Project Coordinator

RCVD OCT 27 '11

OIL CONS. DIV.

Enclosures

DIST. 3

Pc: Danell Zawaski – Williams FCA

COPY



Environmental Services
188 CR 4900
Bloomfield, NM 87413

April 2, 2011

Mr. Mark Kelly
USBLM – Farmington District
1235 La Plata Highway, Suite A
Farmington, NM 8701

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Respectfully,

A handwritten signature in black ink, appearing to read "Mark Harvey".

Mark Harvey
Project Coordinator

I DO HEREBY CERTIFY that this document was sent by CERTIFIED MAIL to the named recipient at the address above on 4/1/11. By A handwritten signature in black ink, appearing to read "Mark Harvey".

COPY



Environmental Services
188 CR 4900
Bloomfield, NM 87413

April 4, 2011

Mr. Brandon Powell
1000 Rio Brazos Road
Aztec, NM 87410

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Mark Harvey
Project Coordinator

Cc: Aaron Dailey – WFS FCA