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

7748

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 FIELD SERVICES (GATHERING COMPANY) OGRID # _____
Address 188 CR 4900 BLOOMFIELD, NM 87413
Facility or well name TALIAFERO 4E
API Number 3004524452 OCD Permit Number _____
U/L or Qtr/Qtr C Section 29 Township 31N Range 12W County SAN JUAN
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 _____bbl Type of fluid _____
Tank Construction material CLOSURE
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type Thickness _____mil ☐ HDPE ☐ PVC ☐ Other _____

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FEB 2011
OIL CONS. DIV. DIST. 3

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

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, hospital, institution or church)*

☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet

☐ Alternate Please specify_____

7.

Netting: Subsection E of 19 15 17 11 NMAC *(Applies to permanent pits and permanent open top tanks)*

☐ Screen ☐ Netting ☐ Other_____

☐ Monthly inspections (If netting or screening is not physically feasible)

8

Signs: Subsection C of 19 15 17 11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☐ Signed in compliance with 19 15 3 103 NMAC

9.

Administrative Approvals and Exceptions:

Justifications and/or demonstrations of equivalency are required Please refer to 19 15 17 NMAC for guidance

Please check a box if one or more of the following is requested, if not leave blank:

☐ Administrative approval(s) Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval

☐ Exception(s) Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval

10.

Siting Criteria (regarding permitting): 19.15 17 10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of 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 - 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)* - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☐ 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 - 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

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 H_2S, 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

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

Disposal Facility Name _____ Disposal Facility Permit Number _____

Disposal Facility Name _____ Disposal Facility Permit Number _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *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 - 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 ☐ NA
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark) - Topographic map, Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application - Visual inspection (certification) of the proposed site, Aerial photo, Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application - NM Office of the State Engineer - iWATERS database, Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 500 feet of a wetland - US Fish and Wildlife Wetland Identification map, Topographic map, Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within the area overlying a subsurface mine - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area - Engineering measures incorporated into the design, NM Bureau of Geology & Mineral Resources, USGS, NM Geological Society, Topographic map	☐ Yes ☐ No
Within a 100-year floodplain - FEMA map	☐ Yes ☐ No

18

On-Site Closure Plan Checklist: (19 15 17 13 NMAC) ***Instructions: Each of the following items must be attached to the closure 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

19

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 _____

20

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

OCD Representative Signature: Jonathan D. Kelly **Approval Date:** 10/20/2011

Title: Compliance Officer **OCD Permit Number:** _____

21.

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:** 12-15-10

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

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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.

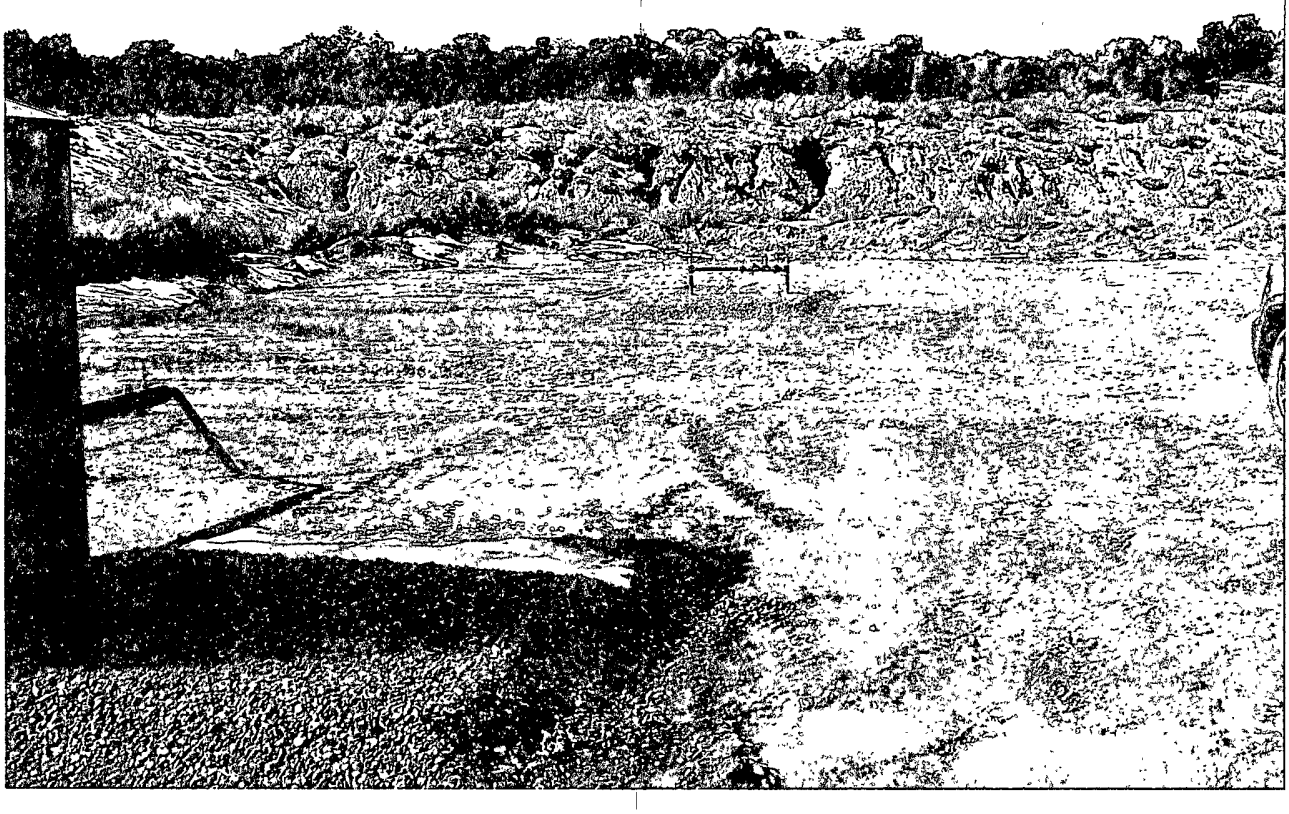
Operator Closure Certification:

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) MARK HARVEY, FOR WFS Title PROJECT COORDINATOR

Signature [signature], ON BEHALF OF WILLIAMS Date 2-10-11

e-mail address _____ Telephone 801-232-8985



TALIAFERO 4E

Williams

Environmental Services
188 CR 4900
Bloomfield, NM 87413

October 5, 2010

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

RE: NOTICE OF BELOW GRADE TANK CLOSURE – Taliafero 4 E

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 Taliafero 4E well site. The site is located in Unit C, Section 29, Township 31N, Range 12W and further identified with API #3004524452. The below grade tank had been used to capture liquids from dehydrator discharge(s).

The tank is 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 is enclosed for your records. Work is scheduled to commence within the next week, weather permitting.

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 Lloyd Bell at (505) 632-4604.

Respectfully,

Mark Harvey
Project Coordinator

Enclosure

I DO HEREBY CERTIFY that this document was sent by CERTIFIED MAIL to the named recipient at the address above on 10-5-10. By MARK HARVEY

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.

Permit No	Company Name	Effective	County	Facility Name	Legals
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
36	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	02/15/1993	Lea	ENVIRONMENTAL PLUS LANDFARM	-14-22 S-37 E
15	GOO YEA LANDFARM INC	11/16/1992	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-25-36 S-20 E
33	DOOM LANDFARM	04/03/2000	Lea	DOOM LANDFARM	g-5-25 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
6	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	-6-26 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
5	BASIN DISPOSAL INC	10/16/1987	San Juan	BASIN DISPOSAL EVAP. POND	F-3-29 N-11 W

Pace Analytical
www.pacelabs.com

Pace Analytical Services, Inc.
9608 Loiret Blvd
Lenexa, KS 66219
(913)599-5665

February 09, 2011

Mr. Mark Harvey
Mile High Environmental
811 B West Apache
Farmington, NM 87401

RE: Project: BM BGTS / TALIAFERO 4E
Pace Project No.: 6093128

Dear Mr. Harvey:
Enclosed are the analytical results for sample(s) received by the laboratory on February 03, 2011. The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Colleen Koporc

colleen.koporc@pacelabs.com
Project Manager

Enclosures

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Lenexa, KS 66219
(913)599-5665

CERTIFICATIONS

Project	BM BGTS / TALIAFERO 4E
Pace Project No	6093128

Kansas Certification IDs
9608 Loiret Boulevard, Lenexa, KS 66219
A2LA Certification # 2456.01
Arkansas Certification #: 05-008-0
Illinois Certification # 001191
Iowa Certification # 118
Kansas/NELAP Certification #: E-10116
Louisiana Certification # 03055
Nevada Certification # KS000212008A
Oklahoma Certification # 9205/9935
Texas Certification # T104704407-08-TX
Utah Certification # 9135995665

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SAMPLE SUMMARY

Project BM BGTS / TALIAFERO 4E
Pace Project No 6093128

Lab ID	Sample ID	Matrix	Date Collected	Date Received
6093128001	**132101FEB11**	Solid	02/01/11 13 21	02/03/11 10 30

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SAMPLE ANALYTE COUNT

Project BM BGTS / TALIAFERO 4E
Pace Project No 6093128

Lab ID	Sample ID	Method	Analysts	Analytes Reported
6093128001	**132101FEB11**	ASTM D2974-87	DWC	1
		EPA 9071B	CMG	1

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ANALYTICAL RESULTS

Project BM BGTS / TALIAFERO 4E
Pace Project No 6093128

Sample: 132101FEB11 **Lab ID: 6093128001** Collected 02/01/11 13 21 Received 02/03/11 10 30 Matrix Solid

Results reported on a "dry-weight" basis

Comments • The samples were received outside of required temperature range Analysis was completed upon client approval
• The sample container was broken during shipment

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No	Qual
Percent Moisture	Analytical Method ASTM D2974-87							
Percent Moisture	**15.1**	%	0 50	1		02/08/11 00 00		
9071 HEM TPH in Soil	Analytical Method EPA 9071B Preparation Method EPA 9071B							
Total Petroleum Hydrocarbons	ND	mg/kg	297	1	02/08/11 00 00	02/08/11 00 00		

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QUALITY CONTROL DATA

Project BM BGTS / TALIAFERO 4E
Pace Project No 6093128

QC Batch PMST/5889 — Analysis Method ASTM D2974-87
QC Batch Method ASTM D2974-87 — Analysis Description Dry Weight/Percent Moisture
Associated Lab Samples 6093128001

METHOD BLANK 767979 — Matrix Solid
Associated Lab Samples 6093128001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Percent Moisture	%	ND	0 50	02/08/11 00 00	

SAMPLE DUPLICATE 767980

Parameter	Units	6092947009 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	20 4	20 7	1	20	

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QUALITY CONTROL DATA

Project BM BGTS / TALIAFERO 4E
Pace Project No 6093128

QC Batch WET/27581 | Analysis Method EPA 9071B
QC Batch Method EPA 9071B | Analysis Description 9071B HEM-TPH Gravimetric
Associated Lab Samples 6093128001

METHOD BLANK 768066 | Matrix Solid
Associated Lab Samples 6093128001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Petroleum Hydrocarbons	mg/kg	ND	250	02/08/11 00 00	

LABORATORY CONTROL SAMPLE 768067

Parameter	Units	Spike Conc	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Total Petroleum Hydrocarbons	mg/kg	2000	2040	102	67-135	

MATRIX SPIKE SAMPLE 768068

Parameter	Units	6093128001 Result	Spike Conc	MS Result	MS % Rec	% Rec Limits	Qualifiers
Total Petroleum Hydrocarbons	mg/kg	ND	2390	3430	134	53-150	

SAMPLE DUPLICATE 768069

Parameter	Units	6092825010 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Petroleum Hydrocarbons	mg/kg	1110	1370	21	42	

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QUALIFIERS

Project BM BGTS / TALIAFERO 4E
Pace Project No 6093128

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content

ND - Not Detected at or above adjusted reporting limit

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit

MDL - Adjusted Method Detection Limit

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270 The result reported for each analyte is a combined concentration

Pace Analytical is NELAP accredited Contact your Pace PM for the current list of accredited analytes

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project BM BGTS / TALIAFERO 4E
Pace Project No 6093128

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
6093128001	**132101FEB11**	ASTM D2974-87	PMST/5889		
6093128001	**132101FEB11**	EPA 9071B	WET/27581	EPA 9071B	WET/27588

MILE HIGH ENVIRONMENTAL
1717 S. 8th ST.
COLORADO SPRINGS, CO
80906
PHONE: 719-632-5613
FAX: 719-471-8486

CHAIN OF CUSTODY

CLIENT: MILE HIGH SERVICES - FARMINGTON, NM	PACKED BY	SEAL NUMBER
PROJECT: NM BGTS	SEAL INTACT UPON RECEIPT BY SAMPLING COMPANY	CONDITION OF CONTENTS
SAMPLING COMPANY: MILE HIGH SERVICES	SEALED FOR SHIPPING BY	INITIAL CONTENTS TEMP. °C
SAMPLING SITE: TALIAFERO 4E	SEAL NUMBER	SAMPLING STATUS ☐ Done ☐ Continuing Until
TEAM LEADER: M. HARVEY	SEAL INTACT UPON RECEIPT BY LAB. ☐ Yes ☐ No	CONTENTS TEMPERATURE UPON RECEIPT BY LAB. °C

DATE	TIME	SAMPLE ID/DESCRIPTION	SAMPLE TYPE	# CONTAINERS	ANALYSIS PARAMETERS	REMARKS 6093128
2-1-11	13:21	132101FEB11	SOIL	1	TPH (OIL + GREASE)	TALIAFERO 4E

CUSTODY TRANSFERS PRIOR TO SHIPPING

RELINQUISHED BY (SIGNED)	RECEIVED BY (SIGNED)	DATE	TIME
M. Harvey	FED-EX	2-2	14:10

SHIPPING DETAILS

DELIVERED TO SHIPPER BY		
METHOD OF SHIPMENT		AIRBILL NUMBER
RECEIVED FOR LAB	SIGNED	DATE/TIME 2/3/11 1030
PROJECT NUMBER		

White – CLIENT Pink – LAB

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 Repor

Name of Company WILLIAMS FOUR CORNERS, LLC	Contact DANELL ZAWASKI
Address 188 CR 4900 BLOOMFIELD, NM	Telephone No. 505-634-4951
Facility Name TALIAFERO 4E	Facility Type WELL

Surface Owner	Mineral Owner	API No. 3004524452

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
C	29	31N	12W					SAN JUAN

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release DEHY DISCHARGE	Volume of Release UNK < 1 BBL	Volume Recovered NONE
Source of Release DEHY LIQUID CONTAINMENT	Date and Hour of Occurrence UNK	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☑ No ☑ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☑ No	If YES, Volume Impacting the Watercourse	

RECEIVED
OCT 2011
OIL CONS. DIV. DIST. 3

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: M. Harvey, FOR WILLIAMS	OIL CONSERVATION DIVISION
Printed Name MARK HARVEY	Approved by Environmental Specialist
Title: PROJECT COORDINATOR	Approval Date: / Expiration Date
E-mail Address markh@ditell.com	Conditions of Approval. / Attached ☐
Date 9-5-10 Phone 505-402-1958	

* Attach Additional Sheets If Necessary

Williams Four Corners, LLC
Below Grade Tank Closure Report

Well Name: TALIAFERO 4E
API Number: 3004524452

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

Notice to the NMOCD Aztec District office was made by email on or about October 5, 2010.

Affirmed: 

Mark Harvey, Project Coordinator

Taliafero #4E

Chloride Results

The soil sample collected was analyzed by a subcontract lab (Midwest Laboratories) and results were reported verbally as less than 100 mg/kg for total chloride At the time, a lab report was not generated

No follow up request was made as action was taken based on the verbal report. Midwest Laboratories is unable to locate any report from February 2011 related to the project