<u>District I</u> 1625 N French Dr., Hott <u>District II</u> 1301 W Grand Avenue, g	RELEIVED
<u>District III</u> 1000 Rio Brazos Road, A District IV	пес, NNNSAR 00 4 2010 -
1220 S St Francis Dia Se	nta Fe, NM-87505 EST S SE

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

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

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

Type of action Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method	
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	
ons: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request	

Instructio

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

Form C-144 WPX Closure FF Ant Conservation Division

Fencing: Subsection D of 19.15 17 11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet	l, hospital.	
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 onc or more of the following is requested, if not leave blank: Administrative approval(s). Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau consideration of approval. Exception(s). Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	ı office for	
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	
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	
Within 500 horizontal feet of a private, domestic fiesh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fiesh 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	

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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				
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19 15 17 9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached. Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19 15 17 9 Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15 17 10 NMAC Design Plan - based upon the appropriate requirements of 19 15 17 11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19 15 17 12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 15 17 9 NMAC and 19 15 17 13 NMAC				
Previously Approved Design (attach copy of design) API Number				
Previously Approved Operating and Maintenance Plan API Number(Applies only to closed-loop system that use				
above ground steel tanks or haul-off bins and propose to implement waste removal for closure)				
Permanent Pits Permit Application Checklist: Subsection B of 19 15 17 9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19 15 17 9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19 15 17 10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15 17 11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19 15 17 11 NMAC Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19 15 17 11 NMAC Quality Control/Quality Assurance Construction and Installation Plan Operating and Maintenance Plan - based upon the appropriate requirements of 19 15 17 12 NMAC Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19 15 17 11 NMAC Nuisance of Hazardous Odors, including H ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19 15 17 9 NMAC and 19 15 17 13 NMAC				
Proposed Closure: 19 15 17 13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan. Type Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Closed-loop System Alternative Proposed Closure Method Waste Excavation and Removal 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 Burcau for consideration)				
Waste Excavation and Removal Closure Plan Checklist: (19 15 17 13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached. □ 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 Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if facilities are required.		
Disposal Facility Name Disposal Facility Permit Number		
'ill 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) \sum 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	AC	
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 sour provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate disconsidered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Just demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.	strict office or may be	
Ground water is less than 50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS, Data obtained from nearby wells	☐ Yes ☑ No ☐ NA	
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search, USGS; Data obtained from nearby wells	☐ Yes ☒ No ☐ NA	
Ground water is more than 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search, USGS, Data obtained from nearby wells	☐ Yes ☐ No ☑ 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 of 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	
On-Site Closure Plan Checklist: (19 15 17 13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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 13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19 15 17 13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19 15 17 13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cann Soil Cover Design - based upon the appropriate requirements of Subsection H of 19 15 17 13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection G of 19 15 17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19 15 17.13 NMAC	15 17 11 NMAC	

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Operator Application Certification: I hereby certify that the information submitted with this application is true, accurately.	rate and complete to the best of my knowledge and belief		
Name (Pint) HOLLY C PERKINS Signature C. Perkins	Title <u>EH&S SPECIALIST</u>		
Signature Alolly C. Perkus	Date2/13/2009		
e-mail address holly perkins@williams com	Telephone505-634-4209		
OCD Approval: Permit Application (including closure plan) Closure P	Plan (only) OCD Conditions (see attachment) Approval Date: 10/18/2011		
Title: Compliance Office	OCD Permit Number:		
THE COMPATIANCE OF THE	OCD Termit Number.		
Closure Report (required within 60 days of closure completion): Subsection Instructions: Operators are required to obtain an approved closure plan prior. The closure report is required to be submitted to the division within 60 days of section of the form until an approved closure plan has been obtained and the closure.	to implementing any closure activities and submitting the closure report. the completion of the closure activities. Please do not complete this		
22			
Closure Method: ☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alterna ☐ If different from approved plan, please explain	ative Closure Method Waste Removal (Closed-loop systems only)		
Closure Report Regarding Waste Removal Closure For Closed-loop Systems Instructions: Please indentify the facility or facilities for where the liquids, drift two facilities were utilized. Disposal Facility Name	lling fluids and drill cuttings were disposed. Use attachment if more than		
Disposal Facility Name			
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			
Reguired 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 ite mark in the box, that the documents are attached.	ems must be attached to the closure report. Please indicate, by a check		
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 (icquired 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 LatitudeLongitude	udc NAD □1927 □ 1983		
	10/10 11/27 17/03		
Operator Closure Certification:			
1 hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief—I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan			
Name (Print)	Title		
Signature	Date		
e-mail address	Telephone		

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

Below-Grade Tank Removal Closure Plan

In accordance with Rule 19.15.17.13 NMAC, the following plan describes the general closure requirements of below-grade tanks (BGT) on Williams Production Co, LLC (WPX) locations in the San Juan Basin of New Mexico. This is WPX's standard closure procedure for all BGTs regulated under Rule 19 15.17 NMAC and operated by WPX. For those closures which do not conform to this standard closure plan, a separate well/pit specific closure plan will be developed and utilized.

Closure Conditions and Timing:

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

- The Division requires closure because of imminent danger to fresh water, public health or the environment.
- The integrity of the BGT fails. Notification will be within 48 hours to the Division and closure will be schedule as specified in 19.15.17 12 (A)(5) NMAC.
- WPX chooses to take the BGT out-of-service due to operational needs. Closure
 under these conditions will be closed within 60 days of cessation of the BGT's
 operation.
- BGTs installed prior to June 16, 2008 that do not meet the requirements under 19.15.17.11.1(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

General Plan Requirements:

- 1. Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current surface owner of record. The surface owner of record will be notified of the intent to closure the BGT by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the surface owner of record will be notified as soon as practical.
- 2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
 - a. Operators Name (WPX)
 - b. Well Name and API Number
 - c. Location (USTR)
- 3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shutin until the rerouting is completed.
- 4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API. 30-039-25465), Middle Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).
- 5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).
- 6. WPX will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as

solid waste Fiberglass tanks and liner materials will meet the conditions of paragraph 1 subsection D of 19.15.9.712 NMAC Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426

- 7. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from the location
- 8. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17 13(E)(4) NMAC as identified in Table 1 Grab samples will be collected from any area that is wet, discolored or showing other evidence of a release. Results will be report to the Division following receipt from the lab on Form C-141

Table 1: Closure Criteria for BGTs

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

⁽¹⁾ Method modified for solid waste

- 9. If the Division and/or WPX determine there is a release, WPX will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.
- 10. Upon completion of the tank removal, the excavation will be backfilled with non-waste earthen material compacted and covered with a minimum of one foot of top soil or background thickness whichever is greater and to existing grade. The surface will be recontoured to match the native grade and prevent ponding.
- 11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. Note. If a surface owner agreement requires reseeding or other surface restoration that do not meet the revegetation requirements of 19 15 17.13.1 NMAC then WPX will submit the proposed alternative with written documentation that the surface owner agrees to the alternative, for Division approval.
- 12 For those portions of the former pit area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

Closure Report:

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

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

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

 $^{^{(2)}}$ If background concentration of Chlorides greater than 250 mg/Kg, then higher concentration will be used for closure