

District I  
1625 S. 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  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
Revised August 1, 2011

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.

9798  
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

**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 OGRID #: \_\_\_\_\_  
Address: 188 County Road 4900, Bloomfield, NM 87413  
Facility or well name: Primo #1 CDP  
API Number: 30-045-11019 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr NE/SW Section 6 Township 31N Range 10W 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 \_\_\_\_\_ ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_  
bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_  
RCVD MAR 19 '12  
OIL CONS. DIV.  
DIST. 3

3.  
☐ **Closed-loop System:** Subsection H of 19.15  
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 \_\_\_\_\_  
No Method 418.1 TPH sample results  
BY: Jonathan Kelly  
DATE: 3/20/12 (505) 334-6178 Ext 122

4.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 45 bbl Type of fluid: 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 Tank buried 30%  
Liner type: Thickness N/A 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.

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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <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. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> 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<sub>2</sub>S, 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.

- 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 (inc

OCD Conditions (see attachment)

OCD Representative Signature: \_\_\_\_\_ Approval Date: \_\_\_\_\_

Title: \_\_\_\_\_ Number: \_\_\_\_\_

# DENIED

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: 1/12/2012

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 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

24.

**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: IEI Permit #NM-01-0010B  
☒ Soil Backfilling and Cover Installation: Completed 1/12/2012  
☐ 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): Matt Webre Title: Environmental Specialist III

Signature: \_\_\_\_\_ Date: 3/12/12

e-mail address: matt.webre@williams.com Telephone: (505) 632-4442



Williams Four Corners, LLC  
Below Grade Tank Closure Report

Well Name: Primo #1  
API Number: 30-045-11019

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

**Requirement:** Eliminate discharge to 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 were 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 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  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4600  
505/632-4863 Fax

December 5, 2011

Mr. Mark Kelly  
USBLM – Farmington District  
1235 La Plata Highway, Suite A  
Farmington, NM 87401

**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:

Primo #1 CDP	24-32N-11W	API# 3004511304
Nye #3	1SW-30N-11W	API#

See attached email - STR and API # incorrect for Primo in these letters.
---

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 December 7, 2011.

If you have any questions regarding the nature and extent of work, or the exact field schedule, please contact me at 505-787-7926.

Respectfully,

Danell Zawaski  
Environmental Specialist

I DO HEREBY CERTIFY that this document was sent by CERTIFIED MAIL to the named recipient at the address above on December 5, 2011. By Kaylugh Reubald

## Zawaski, Danell

---

**From:** Zawaski, Danell  
**Sent:** Monday, December 05, 2011 4:58 PM  
**To:** Powell, Brandon, EMNRD  
**Cc:** Zawaski, Danell; Ruybalid, Tristen  
**Subject:** Notice of Below grade tank closers

Dear Mr. Powell:

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:

Primo #1 CDP	24-32N-11W	API# 3004511304
Nye #3	1SW-30N-11W	API#

See attached email - STR and API # incorrect for Primo in these letters.
---

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 December 7, 2011.

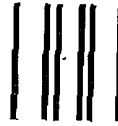
If you have any questions regarding the nature and extent of work, or the exact field schedule, please contact me at 505-787-7926.

Respectfully,

***R. Danell Zawaski***

Environmental Specialist  
Williams Four Corners, LLC  
505/634-4951 work  
505/787-7926 cell  
505/632-4781 fax  
[danell.zawaski@williams.com](mailto:danell.zawaski@williams.com)





First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Williams  
Attn: Darrell Zawaski  
188 County Road 4900  
Bloomfield, NM 87413

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

US BLM - Farmington District  
Attn: Mark Kelly  
1235 La Plata Highway  
Suite A  
Farmington, NM 87401

**2. Article Number**

(Transfer from service label)

**COMPLETE THIS SECTION ON DELIVERY****A. Signature**

X *Jennifer Berally*

- ☐ Agent  
☐ Addressee

**B. Received by (Printed Name)**

*Jennifer Berally*

**C. Date of Delivery****D. Is delivery address different from item 1? ☐ Yes**

If YES, enter delivery address below: ☐ No

**3. Service Type**

- ☒ Certified Mail ☐ Express Mail  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

**4. Restricted Delivery? (Extra Fee)**

☐ Yes

7007 0710 0000 2185 3045

**Deklau, Ingrid**

---

**From:** Webre, Matt  
**Sent:** Tuesday, February 28, 2012 3:52 PM  
**To:** 'brad.a.jones@state.nm.us'  
**Cc:** Deklau, Ingrid; Zawaski, Danell  
**Subject:** BGT permit approval for PRIMO #1 CDP  
**Attachments:** 20120228154852251.pdf

Brad,

I previously submitted a request for OCD to approve the BGT closure permit for PRIMO #1 CDP. After doing some due diligence, I determined that the API# and S-T-R listed on the permit application for PRIMO #1 CDP was incorrect. Please let me know what Williams needs to do correct this error. Attached is page 1 of the C-144 with my edits. I am sorry for this issue, but I am trying to rectify these issues appropriately as I find them.

Regarding our conversation from a couple of weeks ago, I was unaware that the BGT for PRIMO #1 CDP was included in the Agreed Scheduling Order submitted to OCD by Williams. We have completed the BGT removal, remediation, and sampling at the location. Site activities were completed in January 12, 2012. Prior to BGT removal, notifications was made to the OCD Aztec office and property owner, however it was later determined that the notification should have been submitted to the OCD Santa Fe office. Therefore, I am requesting permit approval for the following BGT.

PRIMO #1 CDP	API No. 3004511019	Tank Volume: 45 bbl	Section 6, Township 31N,
Range 10W			

Please contact me with any questions.

Matt Webre, P.G.  
Environmental Specialist III  
Williams Four Corners, LLC  
(505) 632-4442 work  
(505) 215-8059 cell  
(505) 632-4781 fax  
[matt.webre@williams.com](mailto:matt.webre@williams.com)

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	Contact: Matt Webre	
Address: 188 County Road 4900; Bloomfield, NM 87413	Telephone No.: 505-632-4442	
Facility Name: Primo #1 CDP	Facility Type: Below Grade Tank Removal	
Surface Owner: BLM	Mineral Owner	API No. 30-045-11019

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
NE/SW	6	31N	10W					San Juan

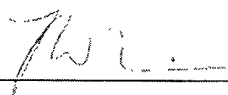
Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

**NATURE OF RELEASE**

Type of Release: N/A-Below Grade Tank Removal	Volume of Release: 0	Volume Recovered: 0
Source of Release: N/A	Date and Hour of Occurrence: N/A	Date and Hour of Discovery: N/A
Was Immediate Notice Given? <input type="checkbox"/> Yes <input 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.*  N/A below grade tank removal;		
Describe Area Affected and Cleanup Action Taken.*		

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.

**OIL CONSERVATION DIVISION**

Signature: 	Approved by Environmental Specialist:		
Printed Name: Matt Webre			
Title: Environmental Specialist	Approval Date:	Expiration Date:	
E-mail Address: matt.webre@williams.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 5/24/12	Phone: 505-632-4442		

\* Attach Additional Sheets If Necessary



**EPA METHOD 8015 Modified  
Nonhalogenated Volatile Organics  
Total Petroleum Hydrocarbons**

Client:	WFS	Project #:	00068-0128
Sample ID:	Primo CDP #1 Wall 001	Date Reported:	01-05-12
Laboratory Number:	60720	Date Sampled:	12-30-11
Chain of Custody No:	12959	Date Received:	01-04-12
Sample Matrix:	Soil	Date Extracted:	01-04-12
Preservative:	Cool	Date Analyzed:	01-04-12
Condition:	Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	ND	0.1
Total Petroleum Hydrocarbons	ND	

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Primo CDP #1**

  
\_\_\_\_\_  
Analyst

  
\_\_\_\_\_  
Review

Client:	WFS	Project #:	00068-0128
Sample ID:	Primo CDP #1 Bottom 002	Date Reported:	01-05-12
Laboratory Number:	60721	Date Sampled:	12-30-11
Chain of Custody No:	12959	Date Received:	01-04-12
Sample Matrix:	Soil	Date Extracted:	01-04-12
Preservative:	Cool	Date Analyzed:	01-04-12
Condition:	Intact	Analysis Requested:	8015 TPH

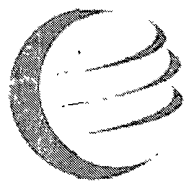
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	ND	0.1
Total Petroleum Hydrocarbons	ND	

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Primo CDP #1**

  
\_\_\_\_\_  
Analyst  
\_\_\_\_\_  
Review



# envirotech

## Analytical Laboratory

EPA Method 8015 Modified  
Nonhalogenated Volatile Organics  
Total Petroleum Hydrocarbons

### Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	01-04-12 QA/QC	Date Reported:	01-05-12
Laboratory Number:	60720	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	01-04-12
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF	C-Cal RF	% Difference	Accept. Range
Gasoline Range C5 - C10	40912	9.996E+02	1.000E+03	0.04%	0 - 15%
Diesel Range C10 - C28	40912	9.996E+02	1.000E+03	0.04%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	2.84	0.2
Diesel Range C10 - C28	2.76	0.1


Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Range
Gasoline Range C5 - C10	ND	ND	0.00%	0 - 30%
Diesel Range C10 - C28	ND	ND	0.00%	0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	ND	250	289	116%	75 - 125%
Diesel Range C10 - C28	ND	250	287	115%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,  
SW-846, USEPA, December 1996.

Comments: QA/QC for Samples 60720-60721.

  
Analyst

  
Review

Client:	WFS	Project #:	00068-0128
Sample ID:	Primo CDP #1 Wall 001	Date Reported:	01-05-12
Laboratory Number:	60720	Date Sampled:	12-30-11
Chain of Custody:	12959	Date Received:	01-04-12
Sample Matrix:	Soil	Date Analyzed:	01-04-12
Preservative:	Cool	Date Extracted:	01-04-12
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	10.0
Toluene	ND	10.0
Ethylbenzene	ND	10.0
p,m-Xylene	ND	10.0
o-Xylene	ND	10.0
Total BTEX	ND	

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	85.3 %
	1,4-difluorobenzene	93.9 %
	Bromochlorobenzene	85.2 %

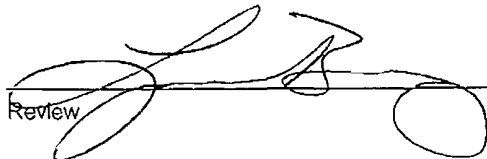
References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Primo CDP #1



Analyst



Review

Client:	WFS	Project #:	00068-0128
Sample ID:	Primo CDP #1 Bottom 002	Date Reported:	01-05-12
Laboratory Number:	60721	Date Sampled:	12-30-11
Chain of Custody:	12959	Date Received:	01-04-12
Sample Matrix:	Soil	Date Analyzed:	01-04-12
Preservative:	Cool	Date Extracted:	01-04-12
Condition:	Intact	Analysis Requested:	BTEX
		Dilution:	10

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	ND	10.0
Toluene	13.4	10.0
Ethylbenzene	10.7	10.0
p,m-Xylene	150	10.0
o-Xylene	18.6	10.0
Total BTEX	192	


ND - Parameter not detected at the stated detection limit.

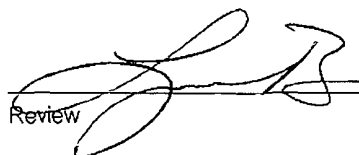
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	85.2 %
	1,4-difluorobenzene	93.2 %
	Bromochlorobenzene	89.9 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Primo CDP #1

  
\_\_\_\_\_  
Analyst

  
\_\_\_\_\_  
Review



Client:	N/A	Project #:	N/A
Sample ID:	0104BBLK QA/QC	Date Reported:	01-05-12
Laboratory Number:	60720	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	01-04-12
Condition:	N/A	Analysis:	BTEX
		Dilution:	10

Calibration and Detection Limits (ug/L)	I-Cal RF	C-Cal RF	%Diff	Blank Conc	Detect. Limit
		Accept Range 0 -	15%		
Benzene	2.2042E+007	2.2087E+007	0.2%	ND	1.0
Toluene	2.2868E+007	2.2914E+007	0.2%	ND	1.0
Ethylbenzene	2.0248E+007	2.0289E+007	0.2%	ND	1.0
p,m-Xylene	5.1552E+007	5.1656E+007	0.2%	ND	1.0
o-Xylene	1.8751E+007	1.8788E+007	0.2%	ND	1.0

Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff	Accept Range	Detect. Limit
Benzene	ND	ND	0.0%	0 - 30%	10.0
Toluene	ND	ND	0.0%	0 - 30%	10.0
Ethylbenzene	ND	ND	0.0%	0 - 30%	10.0
p,m-Xylene	ND	ND	0.0%	0 - 30%	10.0
o-Xylene	ND	ND	0.0%	0 - 30%	10.0

Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	ND	500	476	95.2%	39 - 150
Toluene	ND	500	470	94.0%	46 - 148
Ethylbenzene	ND	500	475	95.0%	32 - 160
p,m-Xylene	ND	1000	953	95.3%	46 - 148
o-Xylene	ND	500	474	94.8%	46 - 148

ND - Parameter not detected at the stated detection limit.

Dilution: Spike and spiked sample concentration represent a dilution proportional to sample dilution.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.  
 Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/QC for Samples 60720-60721.

Analyst

Review

# CHAIN OF CUSTODY RECORD

12959

Client: <b>WFS</b>			Project Name / Location: <b>Primo COP #1</b>				ANALYSIS / PARAMETERS															
Client Address: <b>Math. Weber @ william . com</b>			Sampler Name: <b>Morgan Killian</b>				<div style="display: flex; flex-direction: row-reverse; justify-content: space-between; padding: 5px;"> <div>Sample Cool</div> <div>Sample Intact</div> <div>TPH (418.1)</div> <div>CHLORIDE</div> <div>PAH</div> <div>TCLP with H/P</div> <div>RCI</div> <div>Cation / Anion</div> <div>RCRA 8 Metals</div> <div>VOC (Method 8260)</div> <div>BTEX (Method 8021)</div> <div>TPH (Method 8015)</div> </div>															
Client Phone No.: <b>Math Weber</b> <b>505-215-8059</b>			Client No.: <b>00068-0128</b>																			
Sample No./ Identification	Sample Date	Sample Time	Lab No	Sample Matrix	No./Volume of Containers	Preservative HgCl <sub>2</sub> HCl																
<b>Primo COP #1</b> <i>Wall</i> <b>001</b>	<b>12-30-11</b>	<b>2:10</b>	<b>60720</b>	<b>Soil</b> Solid Sludge Aqueous	<b>1-4%</b>			<b>X</b>	<b>X</b>												<b>X</b>	<b>X</b>
<b>Primo COP #1</b> <i>Bottom</i> <b>002</b>	<b>12-30-11</b>	<b>2:20</b>	<b>60721</b>	<b>Soil</b> Solid Sludge Aqueous	<b>1-4%</b>			<b>X</b>	<b>X</b>												<b>1</b>	<b>1</b>
				Soil Solid Sludge Aqueous																		
				Soil Solid Sludge Aqueous																		
				Soil Solid Sludge Aqueous																		
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				Soil Solid Sludge Aqueous																		
				Soil Solid Sludge Aqueous																		

Relinquished by: (Signature) <b>Morgan Killian</b>		Date <b>1-4-12</b>	Time <b>7:55</b>	Received by: (Signature) <b>Quinn S. Hammer</b>		Date <b>1-4-12</b>	Time <b>7:55</b>
Relinquished by: (Signature)				Received by: (Signature)			
Relinquished by: (Signature)				Received by: (Signature)			

20511



**envirotech**  
Analytical Laboratory

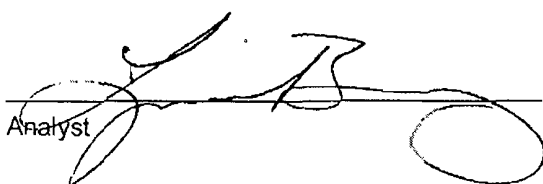
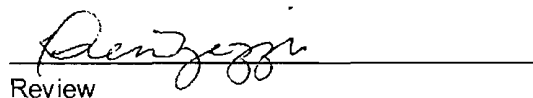
Client:	WFS	Project #:	00068-0128
Sample ID:	Primo CDP #1 Wall 001	Date Reported:	01-23-12
Lab ID#:	60720	Date Sampled:	12-30-11
Sample Matrix:	Soil	Date Received:	01-19-12
Preservative:	Cool	Date Analyzed:	01-20-12
Condition:	Intact	Chain of Custody:	12959

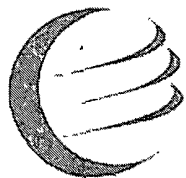
Parameter	Concentration (mg/Kg)
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**Total Chloride****ND**

Reference: U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983.  
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: **Primo CDP #1**

  
Analyst  
Review



Client:	WFS	Project #:	00068-0128
Sample ID:	Primo CDP #1 Bottom 002	Date Reported:	01-23-12
Lab ID#:	60721	Date Sampled:	12-30-11
Sample Matrix:	Soil	Date Received:	01-19-12
Preservative:	Cool	Date Analyzed:	01-20-12
Condition:	Intact	Chain of Custody:	12959

Parameter	Concentration (mg/Kg)
-----------	-----------------------

**Total Chloride**

**20**

Reference: U.S.E.P.A., 4500B, "Methods for Chemical Analysis of Water and Wastes", 1983.  
Standard Methods For The Examination of Water And Waste Water", 18th ed., 1992.

Comments: **Primo CDP #1**

Analyst

Review

# CHAIN OF CUSTODY RECORD

12959

Client: <b>WFS</b>			Project Name / Location: <b>Primo COP #1</b>			ANALYSIS / PARAMETERS															
Client Address: <b>matthew@william.com</b>			Sampler Name: <b>Morgan Killian</b>			TPH (Method 8015)   BTEX (Method 8021)   VOC (Method 8260)   RCRA 8 Metals   Cation / Anion   RCI   TCLP with H/P   PAH   TPH (418.1)   CHLORIDE   Sample Cool   Sample Intact															
Client Phone No.: <b>matthew@william.com</b> <b>505-215-8059</b>			Client No.: <b>00068-0128</b>																		
Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative															
						HgCl <sub>2</sub>	HCl														
<b>Primo COP #1</b> <sup>Well</sup> <b>001</b>	<b>12-30-11</b>	<b>2:10</b>	<b>100720</b>	<b>Solid</b> Sludge Aqueous	<b>1-4 1/2</b>			<b>X</b>	<b>X</b>									<b>X</b>		<b>X</b>	<b>X</b>
<b>Primo COP #1</b> <sup>Bottom</sup> <b>002</b>	<b>12-30-11</b>	<b>2:20</b>	<b>100721</b>	<b>Solid</b> Sludge Aqueous	<b>1-4 1/2</b>			<b>X</b>	<b>X</b>									<b>X</b>		<b>1</b>	<b>1</b>
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
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				Soil Solid	Sludge Aqueous																
				Soil Solid	Sludge Aqueous																
Relinquished by: (Signature) <b>Morgan Killian</b>					Date <b>1-4-12</b>	Time <b>7:55</b>	Received by: (Signature) <b>Quinn S. Hammer</b>					Date <b>1-4-12</b>	Time <b>7:55</b>								
Relinquished by: (Signature)							Received by: (Signature)														
Relinquished by: (Signature)							Received by: (Signature)														

**RUSH**



**envirotech**  
Analytical Laboratory

ENTERED JAN 3 8 2012



RECEIVED OCD

2012 MAR -9 A 6:43



EcoLogic Environmental Consultants, LLC  
1828 Harrison Avenue  
Salt Lake City, UT 84108  
801-583-3107

March 6, 2012

RCVD MAR 19 '12

OIL CONS. DIV.

DIST. 3

Mr. Brad Jones  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**Subject: Below Ground Tank Closure Report - Primo #1 CDP  
Williams Four Corners, LLC**

Dear Mr. Jones:

On behalf of Williams Four Corners, LLC (Williams), EcoLogic Environmental Consultants, LLC (Ecologic) is submitting this Closure Report for the removal of Primo #1 CDP Below Ground Tank (BGT). The Primo #1 CDP is located in NE/SW of Section 6, Township 31N, Range 10W San Juan County, New Mexico. This Closure Report is being submitted following the requirements presented in section 19.15.17.13.K New Mexico Administrative Code (NMAC).

The Williams BGT located at the Primo #1 CDP was included in the Agreed Scheduling Order ASO-013 between Williams and the New Mexico Oil Conservation Division (OCD) dated May 18, 2009. The OCD provided approval of the Primo #1 CDP Closure Plan on March 1, 2012. A copy of the signed C-144 granting approval of the Primo #1 CDP Closure Plan is not included in this submittal, but can be provided upon request.

If you have questions or need any additional information, please contact Matt Webre of Williams at (505) 632-4442 or myself at (801) 583-3107.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ingrid'.

**EcoLogic Environmental Consultants, LLC**  
Ingrid Deklau  
Principal

Attachments: Closure Report  
Cc: Matt Webre, Williams