

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  
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.

**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 Four Corners, LLC OGRID #: \_\_\_\_\_  
Address: 188 County Road 4900, Bloomfield, NM 87413  
Facility or well name: Primo #1 CDP  
API Number: 30-045-11019 OCD Permit Number: Not Applicable  
U/L or Qtr/Qtr K Section 6 Township 31 N Range 10 W County San Juan  
Center of Proposed Design: Latitude 36.9245 Longitude -107.9283 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 \_\_\_\_\_

RCVD AUG 29 '12  
OIL CONS. DIV.  
DIST. 3

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: 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 30% Buried  
Liner type: \_\_\_\_\_ Thickness NA mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

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

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 19.15.16.8 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 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



Environmental Affairs  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4600  
505/632-4781 Fax

September 20, 2012

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

RCVD SEP 21 '12  
OIL CONS. DIV.  
DIST. 3

RE: Revised C-144 Primo CDP #1 (Page 5)  
Permit No. 10358  
Unit K, Section 6, Township 31 North, Range 10 West  
San Juan County, New Mexico

Dear Mr. Kelly:

Attached is the revised C-144 (Page 5) for the Williams Four Corners, LLC (WFC) below-grade tank (BGT) that was removed from location Primo CDP #1 (API No. 30-045-11019). The New Mexico Oil Conservation Division (NMOCD) denied the previously submitted C-144 for BGT closure because soil samples were not analyzed for total petroleum hydrocarbon (TPH) by United States Environmental Protection Agency (USEPA) Method 418.1. WFC completed re-sampling of the BGT and submitted a revised C-144 to NMOCD on August 28, 2012. The revised C-144 (Page 5) is attached at the request of NMOCD because Box 21 (Closure Completion Date) on the August 28, 2012 submittal was inadvertently not completed.

Please contact me at (505) 632-4442 with any questions regarding this submittal.

Sincerely,

A handwritten signature in black ink, appearing to read "M Webre".

Matt Webre, P.G.  
Environmental Specialist

Attachments

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): Matt WebreTitle: Environmental SpecialistSignature: [Signature]Date: 9/20/2012email address: matt.webre@williams.comTelephone: (505) 632-4442

20.

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

OCD Representative Signature: [Signature]Approval Date: 9/24/2012Title: 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: 01/12/2012

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): \_\_\_\_\_ Title: \_\_\_\_\_

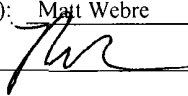
Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

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): Matt WebreTitle: Environmental SpecialistSignature: Date: 8/27/12email address: matt.webre@williams.comTelephone: (505) 632-4442

20.

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

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

**Title:** \_\_\_\_\_ **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: \_\_\_\_\_

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): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_



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.*



## 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  
Range 10W

API No: 3004511019

Tank Volume: 45 bbl

Section 6, Township 31N

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)

## 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)



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

UNITED STATES POSTAL SERVICE



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: Danell 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)

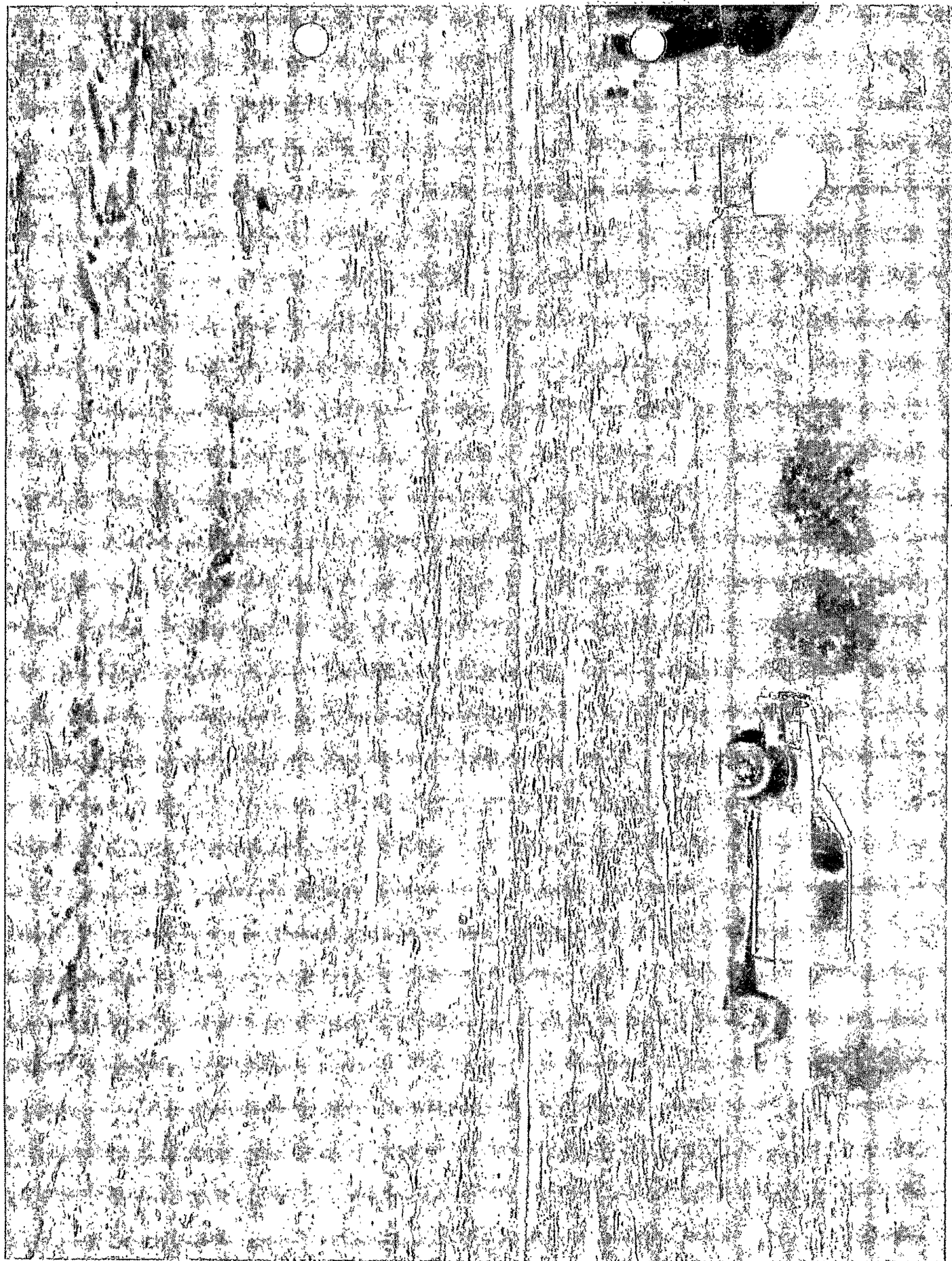
**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
☒ *[Signature]* ☐ Agent  
☐ Addressee  
B. Received by (Printed Name) *[Signature]* 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





August 23, 2012

Mr. Matt Webre  
Williams Four Corners, LLC  
188 County Road 4900  
Bloomfield, New Mexico 87413

**RE: Soil Sampling Report – Below-Grade Tank Closure  
Williams Four Corners, LLC  
Primo CDP #1  
San Juan County, New Mexico**

Dear Mr. Webre:

Williams Four Corners, LLC (Williams) retained LT Environmental, Inc. (LTE) to sample soil at the Primo CDP #1 (Site). This letter presents the results of the investigation in which soil samples were collected and analyzed as part of the New Mexico Oil Conservation Division (NMOCD) closure requirements for a below-grade tank (BGT). Williams began closure activities for the BGT in December 2011 including removal of the BGT, excavation of soil beneath the BGT, and backfilling. Soil confirmation sampling of the excavation was conducted and laboratory analytical results were reported to the NMOCD on a Form C-141 *Release Notification and Corrective Action* dated March 2, 2012. The BGT closure was denied by the NMOCD because soil samples were not analyzed for total petroleum hydrocarbons (TPH) by United States Environmental Protection Agency (USEPA) Method 418.1 as required in 19.15.17 of the New Mexico Administrative Code (NMAC) and Williams' approved closure plan. This report details additional soil sampling conducted by LTE and includes a revised Form C-141 for submittal to the NMOCD for final closure of the BGT.

### **Site Description**

The Site is located in the northeast quarter of the southwest quarter of Section 6, Township 31 North, Range 10 West in San Juan County, New Mexico (Figure 1). The Animas River is 1.06 miles southeast of the Site and 142 feet lower in elevation. An unnamed arroyo is 710 feet west of the Site. Three water wells permitted by the New Mexico Office of the State Engineer are located within one mile of the Site. Groundwater elevation in these wells ranges from 31 feet to 50 feet below ground surface (bgs). Depth to groundwater in the nearest wells, located ½ mile to the east and ¾ mile to the south is approximately 30 feet bgs, but the wells are 54 feet and 133 feet lower in elevation than the Site. It is estimated, based on the above information, that depth to groundwater at the Site is between 50 feet and 100 feet bgs.



## **Soil Sampling**

Williams removed the BGT and excavated visibly impacted soil. Williams collected two composite soil samples from the perimeter and floor of the BGT excavation on December 30, 2011. The soil samples were analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEX) by USEPA Method 8021, TPH (gasoline range organics and diesel range organics) by USEPA Method 8015, and chloride by USEPA Method 300.1. The laboratory analytical reports were submitted as closure documentation to the NMOCD and the excavation was backfilled.

LTE visited the site on June 27, 2012, and worked with Williams personnel to collect additional soil samples from the former excavation for analysis of TPH by USEPA Method 418.1. Williams used a backhoe to dig potholes near the former excavation sidewalls and floor as depicted on Figure 2. The LTE geologist was able to distinguish between naturally occurring brown clayey sand in the sidewalls of the former excavation and brown sand containing gravel and cobbles used to backfill the excavation. Once the former sidewalls were delineated, Williams advanced the potholes until sandstone bedrock was encountered (identified as "floor depth" on Figure 2). Gray consolidated sandstone was observed between 5 feet and 8.5 feet bgs in the potholes. LTE collected a composite soil sample of the sidewalls by depositing four aliquots of soil from between 4 feet and 5 feet bgs (one from each sidewall) into a plastic bag, thoroughly mixing the contents, and sampling into a 4-ounce glass jar. Soil for a composite floor sample was collected from just above the sandstone bedrock in all five potholes. The soil samples were stored on ice and delivered to Hall Environmental Analysis Laboratory in Albuquerque, New Mexico, following strict chain-of-custody procedures for analysis of TPH.

## **Results**

Confirmation soil samples collected from the sidewalls and floor of the BGT excavation on December 30, 2011, and June 27, 2012, did not exceed NMOCD standards for benzene and total BTEX or chloride. No diesel range organic and gasoline range organic components of TPH were detected in the samples collected on December 30, 2011, according to USEPA Method 8015. The TPH concentration in the floor composite sample collected on June 27, 2012, was 150 milligrams per kilograms (mg/kg) as determined by USEPA Method 418.1, which slightly exceeds the NMOCD standard of 100 mg/kg. No TPH was detected in the wall composite sample collected on June 27, 2012. A summary of the analytical results as compared to the NMOCD standards are presented in Table 1 and the laboratory analytical reports are included in Attachment A.

## **Conclusions**

Williams removed impacted soil surrounding the former BGT at the Site to just above the depth of sandstone bedrock. Williams has made a best effort to remove as much impacted



soil as possible based on current site conditions, demonstrating compliance with NMOCD standards for benzene, total BTEX, and chloride concentrations.

The TPH concentration, as determined by USEPA Method 418.1, in the floor sample exceeded the NMOCD standard for BGT pit closures established in 19.15.17 NMAC. Migration of remaining contaminants is unlikely based on the composition of the residual TPH and subsurface geology. Since no gasoline range organic or diesel range organic components of TPH were detected in the original soil samples, it can be deduced that the remaining soil impact beneath the former BGT is in the heavier hydrocarbon range (oil range organics), which is less likely to mobilize in the soil. The distance between the floor of the excavation and groundwater is estimated to be greater than 50 feet. Additionally, the presence of shallow sandstone bedrock will restrict vertical migration of the TPH and contact with groundwater. Clean backfill has been placed above the impacted soil, providing separation of the impacted soil from potential surface receptors. As such, Williams requests closure of the BGT and approval to leave a thin layer of impacted soil containing minor concentrations of TPH in place in the subsurface.

A revised Form C-141 is included as Attachment B for submittal to the NMOCD as part of BGT closure requirements.

LTE appreciates the opportunity to provide these environmental services to Williams. If you have any questions or comments regarding this report, do not hesitate to contact me at (970) 385-1096 or via email at [aager@ltenv.com](mailto:aager@ltenv.com).

Sincerely,

LT ENVIRONMENTAL, INC.

A handwritten signature in black ink that reads 'Ashley L. Ager'. The signature is written in a cursive, flowing style.

Ashley L. Ager, M.S.  
Senior Geologist

#### Attachments

Figure 1	Site Location Map
Figure 2	Site Map/Sample Location Map
Table 1	Soil Analytical Results
Attachment A	Laboratory Analytical Reports
Attachment B	Revised Form C-141



**FIGURES**



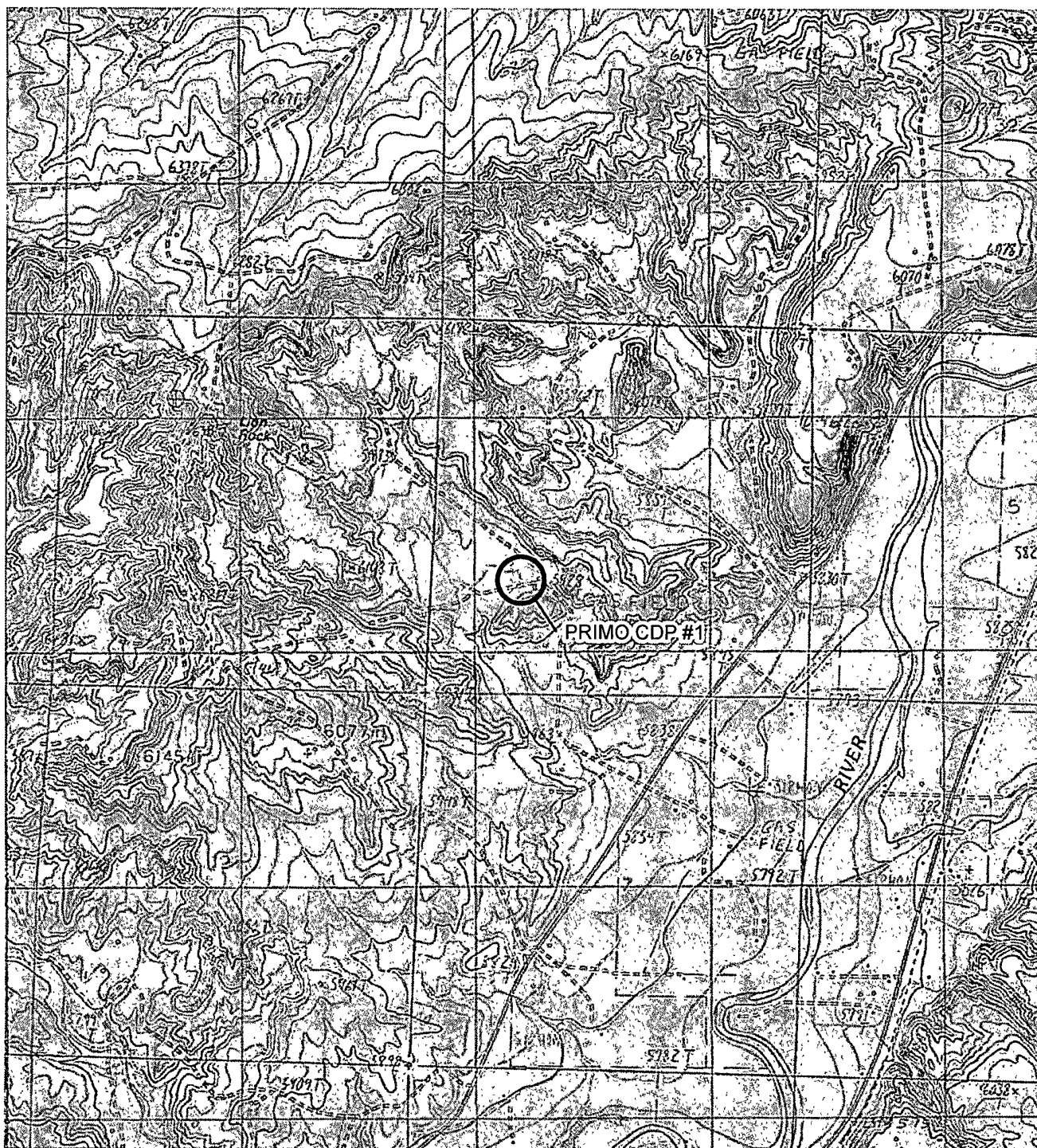


IMAGE COURTESY OF ESR/BING MAPS

# LEGEND

○ SITE LOCATION

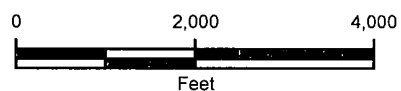


FIGURE 1  
SITE LOCATION MAP  
PRIMO CDP #1  
SAN JUAN COUNTY, NEW MEXICO

WILLIAMS FOUR CORNERS, LLC



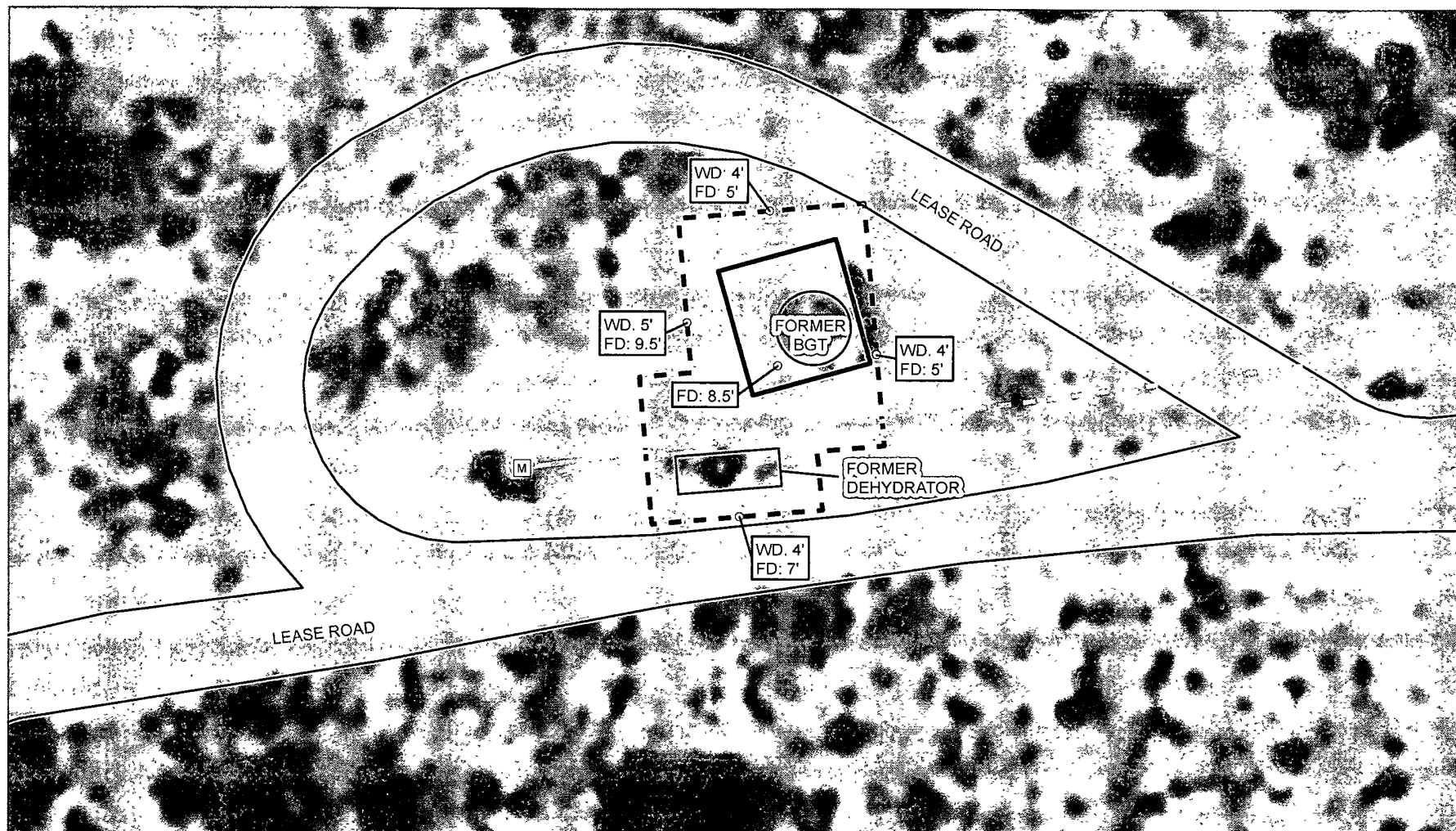


IMAGE COURTESY OF ESRI/BING MAPS

# LEGEND

- POTHOLE
- [M] METER HOUSE
- ABOVEGROUND PIPE
- == BELOWGROUND PIPE
- BERM
- FORMER EXCAVATION EXTENT
- BGT: BELOW-GRADE TANK

WD: DEPTH OF WALL SAMPLE  
FD: DEPTH OF FLOOR SAMPLE

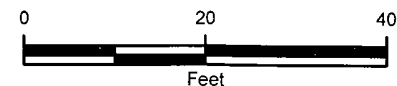


FIGURE 2  
SITE MAP/ SAMPLE LOCATION MAP  
PRIMO CDP #1  
SAN JUAN COUNTY, NEW MEXICO

WILLIAMS FOUR CORNERS, LLC



**TABLE**



TABLE 1

SOIL ANALYTICAL RESULTS  
PRIMO CDP #1  
SAN JUAN COUNTY, NEW MEXICO  
WILLIAMS FOUR CORNERS, LLC

Sample ID	Date Sampled	Chloride (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylenes (mg/kg)	Total BTEX (mg/kg)	GRO (mg/kg)	DRO (mg/kg)	TPH (mg/kg)
Primo CDP #1 Wall 001	12/30/2011	ND	<0.01	<0.01	<0.01	<0.02	<0.01 - <0.05	<0.2	<0.1	<0.1 - <0.3
Primo CDP #1 Bottom 002	12/30/2011	20	<0.01	0.0134	0.0107	0.1686	0.1927 - <0.2027	<0.2	<0.1	<0.1 - <0.3
Wall Composite	6/27/2012	NA	NA	NA	NA	NA	NA	NA	NA	<20
Floor Composite	6/27/2012	NA	NA	NA	NA	NA	NA	NA	NA	<b>150</b>
<b>NMOCD Standard</b>		NE	<b>0.2</b>	NE	NE	NE	<b>50</b>	NE	NE	<b>100</b>

**Notes:**

BTEX - benzene, toluene, ethylbenzene, and total xylenes

DRO - diesel range organics

GRO - gasoline range organics

mg/kg - milligrams per kilogram

NA - not analyzed

ND - not detected

NE - not established

NMOCD - New Mexico Oil Conservation Division

TPH - total petroleum hydrocarbons

&lt; - indicates result is less than the stated laboratory method detection limit

**Bold** - indicates sample exceeds NMOCD standard

**ATTACHMENT A**  
**LABORATORY ANALYTICAL REPORTS**





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

  
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Review



EPA METHOD 8015 Modified  
Nonhalogenated Volatile Organics  
Total Petroleum Hydrocarbons


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.

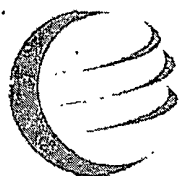
References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

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.

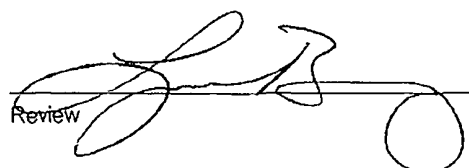
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	85.2 %
	1,4-difluorobenzene	93.2 %
	Bromochlorobenzene	89.9 %

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:	01048BLK 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>				<table border="1"> <tr> <th>TPH (Method 8015)</th> <th>BTEX (Method 8021)</th> <th>VOC (Method 8260)</th> <th>RCRA 8 Metals</th> <th>Cation / Anion</th> <th>RCI</th> <th>TCLP with H/P</th> <th>PAH</th> <th>TPH (418.1)</th> <th>CHLORIDE</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th>Sample Cool</th> <th>Sample Intact</th> </tr> <tr> <td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table>														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																		
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>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 H <sub>2</sub> O <sub>2</sub> HCl			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																													
<b>Primo COP #1 well</b> <b>001</b>	<b>12-30-11</b>	<b>2:10</b>	<b>60720</b>	<b>Soil</b> Solid Aqueous	<b>1-4 1/2</b>				<b>X</b>	<b>X</b>															<b>X</b>	<b>X</b>																													
<b>Primo COP #1 bottom</b> <b>002</b>	<b>12-30-11</b>	<b>2:20</b>	<b>60721</b>	<b>Soil</b> Solid Aqueous	<b>1-4 1/2</b>				<b>X</b>	<b>X</b>															<b>1</b>	<b>1</b>																													
				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>Aurora 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)
-----------	-----------------------

**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: <i>WFS</i>		Project Name / Location: <i>Primo COP #1</i>		ANALYSIS / PARAMETERS													
Client Address: <i>Matt. Webre @ william . com</i>		Sampler Name: <i>Morgan Killian</i>		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.: <i>505-215-8059</i>		Client No.: <i>00068-0128</i>															
Sample No./ Identification	Sample Date	Sample Time	Lab No.	Sample Matrix	No./Volume of Containers	Preservative											
<i>Wail</i> <i>Primo COP #1 001</i>	<i>12-30-11</i>	<i>2:18</i>	<i>60720</i>	<i>Soil</i> Solid Sludge Aqueous	<i>1-4 1/2</i>								<i>X</i>				
<i>Bottom</i> <i>Primo COP #1 002</i>	<i>12-30-11</i>	<i>2:20</i>	<i>60721</i>	<i>Soil</i> Solid Sludge Aqueous	<i>1-4 1/2</i>								<i>X</i>				
				Soil Solid Sludge Aqueous													
				Soil Solid Sludge Aqueous													
				Soil Solid Sludge Aqueous													
				Soil Solid Sludge Aqueous													
				Soil Solid Sludge Aqueous													
				Soil Solid Sludge Aqueous													
				Soil Solid Sludge Aqueous													
				Soil Solid Sludge Aqueous													
				Soil Solid Sludge Aqueous													
Relinquished by: (Signature) <i>Morgan Killian</i>				Date <i>1-4-12</i>	Time <i>7:55</i>	Received by: (Signature) <i>Alicia S. Hammer</i>				Date <i>1-4-12</i>	Time <i>7:55</i>						
Relinquished by: (Signature)						Received by: (Signature)											
Relinquished by: (Signature)						Received by: (Signature)											

*RUSH*



**envirotech**  
Analytical Laboratory

ENTERED JAN 18 2012





*Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [www.hallenvironmental.com](http://www.hallenvironmental.com)*

July 02, 2012

Ashley Ager

LTE

2243 Main Ave Suite 3

Durango, CO 81301

TEL: (970) 946-1093

FAX:

RE: Primo CDP #1

OrderNo.: 1206C15

Dear Ashley Ager:

Hall Environmental Analysis Laboratory received 2 sample(s) on 6/28/2012 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. All samples are reported as received unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", with a stylized flourish at the end.

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

**Analytical Report**

Lab Order: 1206C15

Date Reported: 7/2/2012

**Hall Environmental Analysis Laboratory, Inc.****CLIENT:** LTE**Lab Order:** 1206C15**Project:** Primo CDP #1**Lab ID:** 1206C15-001**Collection Date:** 6/27/2012 12:45:00 PM**Client Sample ID:** Floor Composite**Matrix:** SOIL

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
----------	--------	----	------	-------	----	---------------

**EPA METHOD 418.1: TPH**Analyst: **JMP**

Petroleum Hydrocarbons, TR

150

20

mg/Kg

1

7/2/2012

**Lab ID:** 1206C15-002**Collection Date:** 6/27/2012 12:50:00 PM**Client Sample ID:** Wall Composite**Matrix:** SOIL

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
----------	--------	----	------	-------	----	---------------

**EPA METHOD 418.1: TPH**Analyst: **JMP**

Petroleum Hydrocarbons, TR

ND

20

mg/Kg

1

7/2/2012

**Qualifiers:**

*X	Value exceeds Maximum Contaminant Level
E	Value above quantitation range
J	Analyte detected below quantitation limits
R	RPD outside accepted recovery limits
S	Spike Recovery outside accepted recovery limits

B	Analyte detected in the associated Method Blank
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
RL	Reporting Detection Limit
U	Samples with CalcVal < MDL

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1206C15

02-Jul-12

Client: LTE

Project: Primo CDP #1

Sample ID: MB-2652	SampType: MBLK	TestCode: EPA Method 418.1: TPH
Client ID: PBS	Batch ID: 2652	RunNo: 3819
Prep Date: 6/30/2012	Analysis Date: 7/2/2012	SeqNo: 108217 Units: mg/Kg
Analyte	Result	PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual
Petroleum Hydrocarbons, TR	ND	20

Sample ID: LCS-2652	SampType: LCS	TestCode: EPA Method 418.1: TPH
Client ID: LCSS	Batch ID: 2652	RunNo: 3819
Prep Date: 6/30/2012	Analysis Date: 7/2/2012	SeqNo: 108218 Units: mg/Kg
Analyte	Result	PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual
Petroleum Hydrocarbons, TR	95	20 100.0 0 95.4 87.8 115

Sample ID: LCSD-2652	SampType: LCSD	TestCode: EPA Method 418.1: TPH
Client ID: LCSS02	Batch ID: 2652	RunNo: 3819
Prep Date: 6/30/2012	Analysis Date: 7/2/2012	SeqNo: 108219 Units: mg/Kg
Analyte	Result	PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual
Petroleum Hydrocarbons, TR	99	20 100.0 0 99.1 87.8 115 3.85 8.04

## Qualifiers:

\* / X Value exceeds Maximum Contaminant Level  
E Value above quantitation range  
J Analyte detected below quantitation limits  
R RPD outside accepted recovery limits

B Analyte detected in the associated Method Blank  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
RL Reporting Detection Limit



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87106  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: www.hallenvironmental.com

## Sample Log-In Check List

Client Name:	LTE	Work Order Number:	1206C15
Received by/date:	AG 6/25/12		
Logged By:	Lindsay Mangin	6/28/2012 10:00:00 AM	<i>Judy H. Mangin</i>
Completed By:	Lindsay Mangin	6/28/2012 3:37:18 PM	<i>Judy H. Mangin</i>
Reviewed By:	<i>mg</i>	6/29/12	

### Chain of Custody

- |                                  |  |
|----------------------------------|--|
| 1. Were seals intact?            | Yes <input type="checkbox"/> No <input type="checkbox"/> Not Present <input checked="" type="checkbox"/> |
| 2. Is Chain of Custody complete? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Present <input type="checkbox"/> |
| 3. How was the sample delivered? | Client   |

### Log In

- |  |   |
|--|---|
| 4. Coolers are present? (see 19. for cooler specific information)                              | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>           |
| 5. Was an attempt made to cool the samples?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>           |
| 6. Were all samples received at a temperature of $>0^{\circ}\text{C}$ to $6.0^{\circ}\text{C}$ | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>           |
| 7. Sample(s) in proper container(s)?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                                       |
| 8. Sufficient sample volume for indicated test(s)?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                                       |
| 9. Are samples (except VOA and ONG) properly preserved?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                                       |
| 10. Was preservative added to bottles?   | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/>           |
| 11. VOA vials have zero headspace?   | Yes <input type="checkbox"/> No <input type="checkbox"/> No VOA Vials <input checked="" type="checkbox"/> |
| 12. Were any sample containers received broken?  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                                       |
| 13. Does paperwork match bottle labels?<br>(Note discrepancies on chain of custody)            | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                                       |
| 14. Are matrices correctly identified on Chain of Custody?                                     | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                                       |
| 15. Is it clear what analyses were requested?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                                       |
| 16. Were all holding times able to be met?<br>(If no, notify customer for authorization.)      | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                                       |

# of preserved bottles checked for pH: \_\_\_\_\_  
( $<2$  or  $>12$  unless noted)  
Adjusted? \_\_\_\_\_  
Checked by: \_\_\_\_\_

### Special Handling (if applicable)

17. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified:	_____	Date:	_____
By Whom:	_____	Via:	<input type="checkbox"/> eMail <input type="checkbox"/> Phone <input type="checkbox"/> Fax <input type="checkbox"/> In Person
Regarding:	_____		
Client Instructions:	_____		

18. Additional remarks:

### 19. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	1.0	Good	Yes			



**APPENDIX B**  
**REVISED FORM C-141**



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
K	6	31N	10W					San Juan

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

**NATURE OF RELEASE**

Type of Release: NA – Below Grade Tank Removal	Volume of Release: 0	Volume Recovered: 0
Source of Release: NA	Date and Hour of Occurrence: NA	Date and Hour of Discovery: NA
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.\*

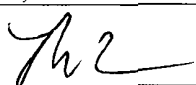
Describe Cause of Problem and Remedial Action Taken.\*

NA – Below Grade Tank Removal and Soil Excavation

Describe Area Affected and Cleanup Action Taken.\*

A below grade tank was removed and the subsurface soil beneath it was excavated to just above sandstone bedrock (4-8.5 feet below ground surface). See attached report for soil sampling results and closure justification.

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: 	<b>OIL CONSERVATION DIVISION</b>		
Printed Name: Matt Webre	Approved by Environmental Specialist:		
Title: Environmental Specialist	Approval Date:	Expiration Date:	
E-mail Address: matt.webre@williams.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 8/27/12	Phone: 505-632-4442		

\* Attach Additional Sheets If Necessary



Environmental Affairs  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4600  
505/632-4781 Fax

August 28, 2012

RCVD AUG 29 '12  
OIL CONS. DIV.

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

DIST. 3

RE: Revised C-144 Primo CDP #1  
Unit K, Section 6, Township 31 North, Range 10 West  
San Juan County, New Mexico

Dear Mr. Kelly:

Attached is the revised C-144 for the Williams Four Corners, LLC (WFC) below-grade tank (BGT) that was removed from location Primo CDP #1 (API No. 30-045-11019). The New Mexico Oil Conservation Division (NMOCD) denied the previously submitted C-144 for BGT closure because soil samples were not analyzed for total petroleum hydrocarbon (TPH) by United States Environmental Protection Agency (USEPA) Method 418.1. WFC completed re-sampling of the BGT on June 27, 2012 with the approved analytical method

Please contact me at (505) 632-4442 with any questions regarding this report.

Sincerely,

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

Matt Webre, P.G.  
Environmental Specialist

Attachments