

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 June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

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

16108
45-07775

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

Instructions: Please submit one application (Form C-144) per individual pit, 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 #: OIL CONS. DIV DIST. 3
Address: 1755 Arroyo Drive, Bloomfield, NM 87413 OCT 19 2017
Facility or well name: Florance #42 Produced Water BGT (1)
API Number: 30-045-07722 07775 OCD Permit Number: _____
U/L or Qtr/Qtr SW/SW (M) Section 27 Township 29N Range 9W County: San Juan County
Center of Proposed Design: Latitude 36.692233° Longitude -107.774997° NAD: ☐ 1927 ☒ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2. ☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
☐ Lined ☐ Unlined Liner type: Thickness _____ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

3. ☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: 45 bbl Type of fluid: Produced Water BGT (1)
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 _____
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

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

5. **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 4 foot hogwire

6.
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)

7.
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

8.
Variances 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:
☒ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.
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. Siting criteria does not apply to drying pads or above-grade tanks.

General siting

Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.

- ☒ NM Office of the State Engineer - iWATERS database search; ☒ USGS; ☒ Data obtained from nearby wells

☐ Yes ☒ No
☐ NA

Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No
☐ NA

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. (**Does not apply to below grade tanks**)

☐ Yes ☐ No

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)

☐ Yes ☐ No

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

Within an unstable area. (**Does not apply to below grade tanks**)

☐ Yes ☐ No

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

Within a 100-year floodplain. (**Does not apply to below grade tanks**)

☐ Yes ☐ No

- FEMA map

Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

☐ Yes ☒ No

- Topographic map; Visual inspection (certification) of the proposed site

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

☐ Yes ☒ No

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

☐ Yes ☐ No

- Topographic map; Visual inspection (certification) of the proposed site

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

☐ Yes ☐ No

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

☐ Yes ☐ No

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

<p>Within 100 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><u>Temporary Pit Non-low chloride drilling fluid</u></p>	
<p>Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).</p> <ul style="list-style-type: none"> - Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;</p> <ul style="list-style-type: none"> - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 300 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><u>Permanent Pit or Multi-Well Fluid Management Pit</u></p>	
<p>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).</p> <ul style="list-style-type: none"> - Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.</p> <ul style="list-style-type: none"> - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.</p> <ul style="list-style-type: none"> - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Within 500 feet of a wetland.</p> <ul style="list-style-type: none"> - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 	<input type="checkbox"/> Yes <input type="checkbox"/> No

10.

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: _____

11.

Multi-Well Fluid Management Pit 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.

☐ 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
☐ A List of wells with approved application for permit to drill associated with the pit.
☐ 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
☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

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

12.

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

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 ☐ Multi-well Fluid Management Pit
☐ 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

14.

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 C 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 H of 19.15.17.13 NMAC
- ☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

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 require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, 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. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 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 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 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

16.
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 E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K 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 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements 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 H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.
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: _____

18.
OCD Approval: ☐ Permit Application (including closure plan) ☒ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: Jonathan D. Kelly Approval Date: 10/30/2017

Title: Compliance Officer OCD Permit Number: _____

19.
Closure Report (required within 60 days of closure completion): 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: 09/12/2017

20.
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.

21.
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 for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☒ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☐ Soil Backfilling and Cover Installation
- ☐ Re-vegetation Application Rates and Seeding Technique
- ☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐ 1927 ☐ 1983

22.

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): Michael HannanTitle: Engineer, Sr.Signature: 

Digitally signed by Michael Hannan
DN: cn=Michael Hannan, o, ou, email=michael.hannan@williams.com, c=US
Date: 2017.10.16 08:08:38 -06'00'

Date: 10/16/2017e-mail address: michael.hannan@williams.comTelephone: 505-632-4807



Williams Four Corners LLC
Below Grade Tank Closure Report
Facility Name: Florance 42
API Number: 3004507722

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 and to NMOCD Aztec District Office 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. Sample locations and 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 not encountered during the BGT removal.

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 excavation to grade and was a an above grade tank was installed at the location.

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 right-of-way (ROW). 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.

From: [Lucero, Christopher](#)
To: [Smith, Cory, EMNRD](#)
Cc: [Hannan, Michael](#); [Fields, Vanessa, EMNRD](#)
Subject: Re: [EXTERNAL] RE: Notice of BGT Removal - Florance 42
Date: Monday, September 11, 2017 12:47:14 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.jpg](#)

Cory,

We should be ready to lift out the first BGT' tomorrow between 11 and noon then proceed to the second one. Morgan Killion @793-1181 will be the inspector on site.

Thanks Chris

Sent from my iPhone

On Sep 8, 2017, at 7:06 AM, Smith, Cory, EMNRD <Cory.Smith@state.nm.us> wrote:

Chris,

Send us an update email with date and time Monday afternoon, as the closure indicates Tuesday, your email mentioned Wednesday. Tuesday would work better for our schedule

Thanks

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Lucero, Christopher [<mailto:Christopher.Lucero@Williams.com>]
Sent: Thursday, September 7, 2017 4:31 PM
To: Hannan, Michael <Michael.Hannan@Williams.com>; Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>
Subject: RE: Notice of BGT Removal - Florance 42

Cory and Vanessa,

The Florance 42 and the Helen Jackson 1 are about a mile apart so therefore we thought we could take care of both in one visit so that you will not have to make multiple trips. I would think that we would be ready for both on Wednesday morning. I will have a better idea Monday afternoon. We have quite a bit of work to do on both sites so we can be somewhat flexible to your schedule. I can give you a call Monday afternoon and we can set up a time for sure. Please let me know if this will work.

Thank You,

Christopher Lucero
Coordinator of Maintenance
FCA-Optimization
(505)632-4463 Office
(505)330-6670 Cell
<http://christopher.lucero@williams.com/>
<image001.jpg>

From: Hannan, Michael
Sent: Thursday, September 07, 2017 4:21 PM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; Lucero, Christopher <Christopher.Lucero@Williams.com>
Subject: RE: Notice of BGT Removal - Florance 42

Cory,

I'm copying Chris Lucero so he can answer your question. Chris schedules/supervises the work crews.

--Mike

From: Smith, Cory, EMNRD [<mailto:Cory.Smith@state.nm.us>]
Sent: Thursday, September 07, 2017 3:49 PM
To: Hannan, Michael <Michael.Hannan@Williams.com>
Cc: Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>
Subject: [EXTERNAL] RE: Notice of BGT Removal - Florance 42

Michael,

What time is the BGT scheduled to be closed?

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Hannan, Michael [<mailto:Michael.Hannan@Williams.com>]
Sent: Thursday, September 7, 2017 8:16 AM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; Thomas, Leigh <l1thomas@blm.gov>
Cc: Lucero, Christopher <Christopher.Lucero@Williams.com>; Templeton, Charles <Charles.Templeton@Williams.com>
Subject: Notice of BGT Removal - Florance 42

Pursuant to the requirements of the New Mexico Oil Conservation District, Williams hereby provides notice of the intent to remove the below-grade tank (BGT) at the following location:

Well Name: Florance 42
API No: 30-045-07775
Location: Unit M, Section 27, Township 29N, Range 9W
Latitude: 36.692233 Longitude: -107.774997

BGT removal is schedule to begin on Tuesday September 12, 2017.

Please contact me if you have any questions regarding the proposed BGT removal and/or schedule.

<!--[if !vml]--><[image002.png](#)><!--[endif]-->**Michael S. Hannan, P.E.** | Williams | Engineer, Sr. |
FCA Environmental Services
Office: 505-632-4807 | Cell: 505-215-7274 | 1755 Arroyo Dr., Bloomfield, NM 87402

<[image003.png](#)><[image004.png](#)> <[image005.png](#)> <[image006.png](#)> <[image007.png](#)> <[image008.png](#)> <[image009.jpg](#)>

If you have received this message in error, please reply to advise the sender of the error and then immediately delete this message.

<!--[if !vml]--><[image002.png](#)><!--[endif]-->Monica Sandoval | Williams |
Environmental Specialist | Operational Excellence – Four Corners Area, LLC
Office: 505-632-4625 | Cell: 505-947-1852 | 1775 Arroyo Dr. Bloomfield, NM
87413

This email originates outside of Williams. Use caution if this message contains attachments, links or requests for information.

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Remediation Excavation and Sampling Form

Excavation Dimensions (feet)

Excavation Diagram and Sample Locations

A hand-drawn diagram of a rectangular field, divided into two sections by a vertical line. The left section is empty. The right section contains four 'x' marks at the corners and the text '5' - Deep' in the center.

OCD Witness Sampling Yes or No

[illegible]



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

September 18, 2017

Michael Hannan
Williams Field Services
1755 Arroyo Dr.,
Bloomfield, NM 87413
TEL: (505) 632-4442
FAX

RE: Florance 42

OrderNo.: 1709633

Dear Michael Hannan:

Hall Environmental Analysis Laboratory received 1 sample(s) on 9/13/2017 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 or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. 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. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. 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.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report

Lab Order 1709633

Date Reported: 9/18/2017

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Williams Field Services

Client Sample ID: Bottom Composite

Project: Florance 42

Collection Date: 9/12/2017 12:30:00 PM

Lab ID: 1709633-001

Matrix: MEOH (SOIL)

Received Date: 9/13/2017 8:00:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: MRA
Chloride	ND	30		mg/Kg	20	9/13/2017 10:55:56 AM	33850
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: TOM
Diesel Range Organics (DRO)	ND	9.7		mg/Kg	1	9/13/2017 11:00:12 AM	33837
Motor Oil Range Organics (MRO)	ND	49		mg/Kg	1	9/13/2017 11:00:12 AM	33837
Surr: DNOP	112	70-130		%Rec	1	9/13/2017 11:00:12 AM	33837
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	3.9		mg/Kg	1	9/13/2017 11:35:55 AM	33823
Surr: BFB	99.1	54-150		%Rec	1	9/13/2017 11:35:55 AM	33823
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.019		mg/Kg	1	9/13/2017 11:35:55 AM	33823
Toluene	ND	0.039		mg/Kg	1	9/13/2017 11:35:55 AM	33823
Ethylbenzene	ND	0.039		mg/Kg	1	9/13/2017 11:35:55 AM	33823
Xylenes, Total	ND	0.078		mg/Kg	1	9/13/2017 11:35:55 AM	33823
Surr: 4-Bromofluorobenzene	107	66.6-132		%Rec	1	9/13/2017 11:35:55 AM	33823

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	PQL	Practical Quantitative Limit	RL	Reporting Detection Limit
	S	% Recovery outside of range due to dilution or matrix	W	Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1709633

18-Sep-17

Client: Williams Field Services

Project: Florance 42

Sample ID	MB-33850		SampType: mblk		TestCode: EPA Method 300.0: Anions					
Client ID:	PBS		Batch ID: 33850		RunNo: 45597					
Prep Date:	9/13/2017		Analysis Date: 9/13/2017		SeqNo: 1447714		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID	LCS-33850		SampType: lcs		TestCode: EPA Method 300.0: Anions					
Client ID:	LCSS		Batch ID: 33850		RunNo: 45597					
Prep Date:	9/13/2017		Analysis Date: 9/13/2017		SeqNo: 1447715		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.8	90	110			

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
| D Sample Diluted Due to Matrix | E Value above quantitation range |
| H Holding times for preparation or analysis exceeded | J Analyte detected below quantitation limits |
| ND Not Detected at the Reporting Limit | P Sample pH Not In Range |
| PQL Practical Quantitative Limit | RL Reporting Detection Limit |
| S % Recovery outside of range due to dilution or matrix | W Sample container temperature is out of limit as specified |

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1709633

18-Sep-17

Client: Williams Field Services

Project: Florance 42

Sample ID	LCS-33837		SampType: LCS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	LCSS		Batch ID: 33837		RunNo: 45589					
Prep Date:	9/13/2017		Analysis Date: 9/13/2017		SeqNo: 1446161		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	49	10	50.00	0	98.7	73.2	114			
Surr: DNOP	4.9		5.000		97.1	70	130			

Sample ID	MB-33837		SampType: MBLK		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	PBS		Batch ID: 33837		RunNo: 45589					
Prep Date:	9/13/2017		Analysis Date: 9/13/2017		SeqNo: 1446162		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	11		10.00		107	70	130			

Sample ID	1709633-001AMS		SampType: MS		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	Bottom Composite		Batch ID: 33837		RunNo: 45589					
Prep Date:	9/13/2017		Analysis Date: 9/13/2017		SeqNo: 1446215		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	47	9.8	48.78	0	96.1	55.8	122			
Surr: DNOP	5.0		4.878		103	70	130			

Sample ID	1709633-001AMSD		SampType: MSD		TestCode: EPA Method 8015M/D: Diesel Range Organics					
Client ID:	Bottom Composite		Batch ID: 33837		RunNo: 45589					
Prep Date:	9/13/2017		Analysis Date: 9/13/2017		SeqNo: 1446216		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	49	9.8	48.92	0	99.6	55.8	122	3.81	20	
Surr: DNOP	5.1		4.892		105	70	130	0	0	

Qualifiers:

* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D Sample Diluted Due to Matrix	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit	P Sample pH Not In Range
PQL Practical Quantitative Limit	RL Reporting Detection Limit
S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1709633

18-Sep-17

Client: Williams Field Services

Project: Florance 42

Sample ID	MB-33823		SampType: MBLK		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	PBS		Batch ID: 33823		RunNo: 45592					
Prep Date:	9/12/2017		Analysis Date: 9/13/2017		SeqNo: 1446394		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	1000		1000		101	54	150			

Sample ID	LCS-33823		SampType: LCS		TestCode: EPA Method 8015D: Gasoline Range					
Client ID:	LCSS		Batch ID: 33823		RunNo: 45592					
Prep Date:	9/12/2017		Analysis Date: 9/13/2017		SeqNo: 1446395		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	29	5.0	25.00	0	116	76.4	125			
Surr: BFB	1100		1000		110	54	150			

Qualifiers:

* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D Sample Diluted Due to Matrix	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit	P Sample pH Not In Range
PQL Practical Quantitative Limit	RL Reporting Detection Limit
S % Recovery outside of range due to dilution or matrix	W Sample container temperature is out of limit as specified

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 1709633

18-Sep-17

Client: Williams Field Services

Project: Florance 42

Sample ID	MB-33823		SampType: MBLK		TestCode: EPA Method 8021B: Volatiles					
Client ID:	PBS		Batch ID: 33823		RunNo: 45592					
Prep Date:	9/12/2017		Analysis Date: 9/13/2017		SeqNo: 1446401		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.1		1.000		109	66.6	132			

Sample ID	LCS-33823		SampType: LCS		TestCode: EPA Method 8021B: Volatiles					
Client ID:	LCSS		Batch ID: 33823		RunNo: 45592					
Prep Date:	9/12/2017		Analysis Date: 9/13/2017		SeqNo: 1446402		Units: mg/Kg			
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.025	1.000	0	114	80	120			
Toluene	1.1	0.050	1.000	0	110	80	120			
Ethylbenzene	1.1	0.050	1.000	0	114	80	120			
Xylenes, Total	3.5	0.10	3.000	0	115	80	120			
Surr: 4-Bromofluorobenzene	1.1		1.000		111	66.6	132			

Qualifiers:

- | | |
|---|---|
| * Value exceeds Maximum Contaminant Level. | B Analyte detected in the associated Method Blank |
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Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: WILLIAMS FOUR CORN

Work Order Number: 1709633

RcptNo: 1

Received By: Richie Eriacho

9/13/2017 8:00:00 AM

Completed By: Ashley Gallegos

9/13/2017 8:45:14 AM

Reviewed By: ENM

9/13/17

12 <
AS

Chain of Custody

1. Custody seals intact on sample bottles? Yes ☐ No ☐ Not Present ☒
2. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
3. How was the sample delivered? Courier

Log In

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

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

Special Handling (if applicable)

16. 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:	_____		

17. Additional remarks:

18. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.8	Good	Yes			

