District J
1625 N. French Dr., Hobbs, NM 88240
District II . ▲
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

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.

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

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.
I. Operator: Williams Production Co, LLC OGRID #: 120782
Address:PO Box 640/721 So. Main, Aztec, NM 87410
Facility or well name: Rosa Unit #165C
API Number:30-039-26961OCD Permit Number:
U/L or Qtr/Qtr G Section 25 Township 31N Range 06W County: Rio Arriba
Center of Proposed Design: Latitude36.87308 Longitude107.41376 NAD: □1927 ☑ 1983
Surface Owner: Federal State Tribal Trust or Indian Allotment
Surface Owner. Pederal State Private Titosi of indian Anothicit
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
Liner Seams: Welded Factory Other
Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off Visible sidewalls, liner, 6-inch lift Visible sidewalls, liner, 6-inch lift Visi
Tank Construction material:Fiberglass BGT Pit
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: Thickness120mil
, in the state of
5.
5. Alternative Method:

Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks) Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, institution or church) Four foot height, four strands of barbed wire evenly spaced between one and four feet	hospital,
Alternate. Please specifyPer BLM APD Specifications	
7. Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks) Screen □ Netting □ Other □ □ Monthly inspections (If netting or screening is not physically feasible)	
8. Signs: Subsection C of 19.15.17.11 NMAC ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers ☐ Signed in compliance with 19.15.3.103 NMAC	
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 consideration of approval. Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.	office for
Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accept material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the approoffice or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dry above-grade tanks associated with a closed-loop system.	priate district pproval.
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☐ NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to permanent pits) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☐ NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 500 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
 Within an unstable area. Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map 	☐ Yes ☐ No
Within a 100-year floodplain FEMA map	☐ Yes ☐ No

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are
attached. Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC
and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached. Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9 Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
Previously Approved Design (attach copy of design) API Number:
Previously Approved Operating and Maintenance Plan API Number:(Applies only to closed-loop system that use
above ground steel tanks or haul-off bins and propose to implement waste removal for closure)
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached. Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Climatological Factors Assessment Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC Leak Detection Design - 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 ₂ S, Prevention Plan Emergency Response Plan Oil Field Waste Stream Characterization Monitoring and Inspection Plan Erosion Control Plan Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Closed-loop System Alternative Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental 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 G of 19.15.17.13 NMAC

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground S Instructions: Please indentify the facility or facilities for the disposal of liquids, d facilities are required.		
· · · · · · · · · · · · · · · · · · ·	Disposal Facility Permit Number:	
Disposal Facility Name:	·	
Will any of the proposed closed-loop system operations and associated activities occ Yes (If yes, please provide the information below) \(\subseteq \text{No.} \)		
Required for impacted areas which will not be used for future service and operation Soil Backfill and Cover Design Specifications based upon the appropriate Re-vegetation Plan - based upon the appropriate requirements of Subsection I Site Reclamation Plan - based upon the appropriate requirements of Subsection	requirements of Subsection H of 19.15.17.13 NMA of 19.15.17.13 NMAC	С
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 c provided below. Requests regarding changes to certain siting criteria may require considered an exception which must be submitted to the Santa Fe Environmental demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for	administrative approval from the appropriate dist Bureau office for consideration of approval. Just	rict office or may be
Ground water is less than 50 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data	obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data	obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data	obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other sign lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	ificant watercourse or lakebed, sinkhole, or playa	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church - Visual inspection (certification) of the proposed site; Aerial photo; Satellite		☐ Yes ☐ No
Within 500 horizontal feet of a private, domestic fresh water well or spring that less watering purposes, or within 1000 horizontal feet of any other fresh water well or sp - NM Office of the State Engineer - iWATERS database; Visual inspection (content of the state and the state of th	ring, in existence at the time of initial application.	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approva		☐ Yes ☐ No
Within 500 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map; Visual	l 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 Society; Topographic map	& Mineral Resources; USGS; NM Geological	☐ Yes ☐ No
Within a 100-year floodplain FEMA map		☐ Yes ☐ No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the by a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Protocols and Procedures - based upon the appropriate requirements of 19.15. Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection Plan - based upon the appropriate requirements of Subsection In Re-vegetation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Site Reclamation Plan - based upon the appropriate requirements of Subsection In Institute Insti	irements of 19.15.17.10 NMAC Subsection F of 19.15.17.13 NMAC propriate requirements of 19.15.17.11 NMAC d) - based upon the appropriate requirements of 19. 17.13 NMAC irements of Subsection F of 19.15.17.13 NMAC Subsection F of 19.15.17.13 NMAC fill cuttings or in case on-site closure standards cann I of 19.15.17.13 NMAC for 19.15.17.13 NMAC	15.17.11 NMAC

Operator Application Certification: I hereby certify that the information submitted with this application is	true, accurate and complete to	o the best of my knowledge and belief.
Name (Print):	Title:	
Signature:	Date:	
e-mail address	Telephone:	
20. OCD Approval: Permit Application (including closure plan)	Closure Plan (only) DC	D Conditions (see attachment)
OCD Representative Signature:		Approval Date: <u>4-9-10</u>
Title: Enviro/spec	OCD Permit Nu	mber:
21. <u>Closure Report (required within 60 days of closure completion):</u> Instructions: Operators are required to obtain an approved closure part the closure report is required to be submitted to the division within 6 section of the form until an approved closure plan has been obtained.	plan prior to implementing an 60 days of the completion of th I and the closure activities hav	y closure activities and submitting the closure report. he closure activities. Please do not complete this we been completed.
☐ Closure Completion Date: 8/9/2008 S.J. Regional	I Landfill, NMED Permit S\	WM-052426
22. Closure Method: Waste Excavation and Removal ☐ On-Site Closure Method ☐ If different from approved plan, please explain.	☐ Alternative Closure Metho	od Waste Removal (Closed-loop systems only)
23. Closure Report Regarding Waste Removal Closure For Closed-loc Instructions: Please indentify the facility or facilities for where the l 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 Yes (If yes, please demonstrate compliance to the items below)		ot be used for future service and operations?
Required for impacted areas which will not be used for future service of Site Reclamation (Photo Documentation) Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique	and operations:	
Closure Report Attachment Checklist: Instructions: Each of the finark 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 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		ned to the closure report. Please indicate, by a check NAD: 1927 1983
25. Operator Closure 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): Michael K. Lane T	itle: E	H&S SPECIALIST
Signature:	Date8/4/69	
e-mail address myke.lane@williams.com	Telephone:	505-634-4219

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

Below-Grade Tank Removal Closure Report

Well: (Rosa Unit #165C)
API No: 30-039-26961

Location: G-S25-T31N-R06W, NMPM

In accordance with Rule 19.15.17.13 NMAC, the following report describes the general closure of the referenced below-grade tanks (BGT) on Williams Production Co, LLC (WPX) location in the San Juan Basin of New Mexico. The closure follows this WPX's standard closure procedure for all BGTs regulated under Rule 19.15.17 NMAC and operated by WPX. For those closures which do not conform to the standard closure plan, a separate well/pit specific closure plan will be developed and utilized.

Closure Conditions and Timing:

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

- The Division requires closure because of imminent danger to fresh water, public health or the
 environment.
- The integrity of the BGT fails. Notification will be within 48 hours to the Division and closure will be schedule as specified in 19.15.17.12 (A)(5) NMAC.
- WPX chooses to take the BGT out-of-service due to operational needs. Closure under these conditions will be initiated within 60 days of cessation of the BGT's operation.
- BGTs installed prior to June 16, 2008 that do not meet the requirements under 19.15.17.11.1(6) NMAC and WPX chooses not to retrofit or upgrade. Closure under these conditions will be completed within five years (by June 16, 2013).

General Plan Requirements:

- Prior to initiating any BGT Closure except in the case of an emergency, WPX will review County Tax Records for the current landowner of record. The landowner of record will be notified of the intent to closure the BGT by certified mail and a copy of this notification will be included in the closure report. In the case of an emergency, the landowner of record will be notified as soon as practical.
 Williams notified the SMA of its intent to clean close the BGT via Certified Mail on March 10, 2009 see attached. No return receipt required per BLM:FFO/NMOCD MOU dated 5/4/09.
- 2. Notice of Closure will be given to the Aztec District office between 72 hours and one week of the scheduled closure via email or phone. The notification of closure will include the following:
 - a. Operators Name (WPX)
 - b. Well Name and API Number
 - c. Location (USTR)

Aztec District office was notified of Williams E&P intent to close on (8/3/2008). Emgil attached.

- 3. All piping will be rerouted to an alternative produced water storage/disposal location (e.g. surface tanks, temporary frac tank, ...). The well will be temporarily shutin until the rerouting is completed. Williams closed the BGT used by the Rosa 165C separator and piped all liquids to the Produced Water Storage Tank. The Rosa 165C was shut in until the rerouting was completed.
- 4. All produced water will be removed from the BGT following discharge-pipe rerouting. Produced water will be disposed at one of the following NMOCD approved facilities depending on the proximity of the BGT site: Rosa Unit SWD #1 (Order: SWD-916, API: 30-039-27055), Rosa Unit #94 (Order: SWD-3RP-1003-0, API: 30-039-23035), Jillson Fed. SWD #001 (Order: R10168/R10168A, API: 30-039-25465), Middle Mesa SWD #001 (Order: SWD-350-0, API: 30-045-27004) and/or Basin Disposal (Permit: NM-01-0005).
 Produced water in the BGT prior to closures was removed by vacuum truck and hauled to the Rosa Unit

<u>Produced water in the BGT prior to closures was removed by vacuum truck and hauled to the Rosa Unit disposal wells listed.</u>

San Juan Basin: New Mexico Assets

5. Solids and sludges will be shoveled and /or vacuumed out for disposal at Envirotech (Permit Number NM-01-0011).

No solids or sludge required removal prior to excavation and removal of the tank.

6. Williams will obtain prior approval from NMOCD to dispose, recycle, reuse, or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass tanks will be empty, cut up or shredded, and EPA cleaned for disposal as solid waste. Liners materials will be cleaned without soils or contaminated material for disposal as solid waste. Fiberglass tanks and liner materials will meet the conditions of paragraph 1 subsection D or 19.15.9.712 NMAC. Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426.

The fiberglass tank and plastic liner was disposed of at the San Juan Regional Landfill copy of the disposal ticket is attached.

- 7. Any equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from the location.

 The fiberglass tank and plastic liner were removed offsite. All other piping and equipment remains in use. See attached photo.
- 8. Following removal of the tank and any liner material, a five-point composite sample will be taken of the excavation and tested per 19.15.17.13(E)(4) NMAC as identified in Table 1. Grab samples will be collected from any area that is wet, discolored or showing other evidence of a release. Results will be report to the Division following receipt from the lab on Form C-141.

Table 1: Closure Criteria for BGTs

Components	Testing Methods	Closure Limits (mg/Kg)	Sample Results (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2	.0029
BTEX	EPA SW-846 Method 8021B or 8260B	50	.0406
TPH	EPA SW-846 Method 418.1(1)	100	55.3
Chlorides	EPA SW-846 Method 300.1(1)	250 ⁽²⁾	65

⁽¹⁾ Method modified for solid waste.

9. If the Division and/or Williams determine there is a release, Williams will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC.

No release detected.

10. Upon completion of the tank removal, and any necessary soil remediation, the excavation will be backfilled with non-waste earthen material compacted to native and covered with a minimum of one foot of top soil or background thickness. The surface will be recontoured to match the native grade.

<u>Pit area backfilled with clean earthen material following sample results. No contaminated soil taken off site.</u> Backfill compacted to avoid settling and pit area remains in use for production operations.

11. For those portions of the former pit area no longer required for production activities, WPX will seed the disturbed areas the first growing season after the pit is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division-approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained

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

San Juan Basin: New Mexico Assets

that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. Note: WPX assumes the seeding stipulations including mix and seeding methods specified by the Surface Management Agency (BLM, BOR, USFS, Tribal, etc.) APD are Division-approved methods unless notified by the Division of their unacceptability. If a landowner agreement requires reseeding or other surface restoration that do not meet the revegetation requirements of 19.15.17.13. I then WPX will submit the proposed alternative with written documentation that the landowner agrees to the alternative, for Division approval.

Pit area along with unused portions of well pad interim reclaimed and following P&A entire location to be reclaimed and recontoured in accordance with Surface Management Agency requirements in APD-COAs and per BLM:FFO/NMOCD MOU dated 5/4/09.

12. For those portions of the former pit area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above. See above notes.

Closure Report:

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

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

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

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District II

1301 W. Grand Avenue, Artesia, NM 88210

District III 1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 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

Revised October 10, 2003 Submit 2 Copies to appropriate District Office in accordance

Form C-141

with Rule 116 on back side of form

Release Notification and Corrective Action OPERATOR Final Report WILLIAMS PRODUCTION, LLC Contact HOLLY C. PERKINS

Name of Co	Name of Company WILLIAMS PRODUCTION, LLC Contact HOLLY C. PERKINS								
Address P.O. BOX 640, AZTEC, NM 87410 Telephone No. (505) 634-4209									
Facility Name Rosa Unit #165C Facility Type Well Site									
Surface Ow	ner BLM			Mineral C	wner			Lease	No.
				LOCA	ATIO	N OF RE	LEASE		
Unit Letter	Section	Township	Range	Feet from the	North	/South Line	Feet from the	East/West Line	County
G	25	31N	06W						Rio Arriba
		Lat	itude	36.8715		Longitude	-107.4137	79	
				NAT	URE	OF REL	EASE		
Type of Rele	ase NA					Volume of			Recovered
Source of Re							Iour of Occurrenc	e Date and	Hour of Discovery
Was Immedia	ate Notice (Yes [No 🛛 Not Re	equired	If YES, To	Whom?		
By Whom?	· · · · · · · · · · · · · · · · · · ·					Date and H	Iour		
Was a Water	course Read	ched?				If YES, Vo	olume Impacting t	he Watercourse.	
			Yes [] No					
If a Watercou	ırse was Im	pacted, Descr	ibe Fully.*	k		-1			
			,						
						•			
Describe Cau	ise of Probl	em and Reme	dial Action	n Taken.*					
Pit Closure S	ample Resu	ılt Report. No	reportable	release discovere	ed. See	attachment re	sults.		
	_	_	_						
Describe Are	a Affected	and Cleanup A	Action Tak	ren *					
Beschiberine		ana creamap r	1011011 141						
									rsuant to NMOCD rules and
									leases which may endanger
									lieve the operator of liability er, surface water, human health
									compliance with any other
federal, state,	or local lav	ws and/or regu	ılations.						
		TA	\	$\overline{}$			OIL CON	<u>SERVATION</u>	<u>I DIVISION</u>
Signature:	(A)		7	00					
	92					Approved by	District Supervise	or:	
Printed Name	e: Michael	K. Lane							
Title: EH&S	Specialist					Approval Da	te:	Expiration	Date:
E-mail Addre	ess: myke.l	ane@williams	s.com			Conditions of	f Approval:		Attached
									i macined 🗀

Phone: (505) 634-4219 * Attach Additional Sheets If Necessary

Lane, Myke (E&P)

From: Lane, Myke (E&P)

Sent: Wednesday, September 03, 2008 10:28 AM

To: Brandon.powell@state.nm.us; Mark Kelly (Mark_Kelly@nm.blm.gov)

Cc: Lain, Matt (E&P)

Subject: Rosa 165C - Pit CLosure Notice

This is notice that Williams is planning to close the below-grade tank (BGT) on the reference well within the next week, weather permitting.

Williams Production Rosa Unit 165C API: 30-039-26961 G-S25-31N-0^W Rio Arriba Co.

This notice is to comply with 19.15.17.13.J NMAC and the approved NMOCD Closure Plan.

Please contact Matt Lain at 505-634-4242 if there are any questions.

Michael K. (Myke) Lane, PE EH&S Team Leader - San Juan Basin Operations 721 S. Main/PO Box 640, Aztec, NM 87410 (505) 634-4219(off); -4205(fax); 330-3198(cell)

"The problems we face cannot be resolved at the same level of thinking as that which gave rise to them!"---shared with me by Brent Hale



EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client:	WPX	Project #:	04108-0003
Sample ID:	Pit Exc.	Date Reported:	10-26-08
Laboratory Number:	47738	Date Sampled.	10-13-08
Chain of Custody No:	5553	Date Received:	10-14-08
Sample Matrix:	Soil	Date Extracted:	10-20-08
Preservative:	Cool	Date Analyzed [.]	10-21-08
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	0.2

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:

Rosa 165C.

Analyst



EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

			-		
Client:	QA/QC		Project #:		N/A
Sample ID:	10-21-08 QA/Q	(C	Date Reported:		10-26-08
Laboratory Number.	47738		Date Sampled.		N/A
Sample Matrix:	Methylene Chlori	de	Date Received.		N/A
Preservative,	N/A		Date Analyzed		10-21-08
Condition.	N/A		Analysis Reque	sted:	TPH
	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept Range
Gasoline Range C5 - C10	05-07-07	9 8731E+002	9.8771E+002	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	1.0085E+003	1 0089E+003	0.04%	0 - 15%
Blank Conc. (mg/L - mg/Kg)		Concentration		Detection Limi	i
Gasoline Range C5 - C10		ND	and the second section of the second	0.2	
Diesel Range C10 - C28		ND		0.1	
Total Petroleum Hydrocarbons		ND		0.2	
Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range	
Gasoline Range C5 - C10	ND	ND	0.0%	0 - 30%	***************************************
Diesel Range C10 - C28	ND	ND	0.0%	0 - 30%	
Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
Gasoline Range C5 - C10	ND	250	253	101%	75 - 125%
Diesel Range C10 - C28	ND	250	249	99.6%	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 47738, 47739, 47759 - 47763, 47776, and 47789.

Analyst



EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client:	WPX	Project #:	04108-0003
Sample ID:	Pit Exc.	Date Reported:	10-26-08
Laboratory Number:	47738	Date Sampled:	10-13-08
Chain of Custody No:	5553	Date Received:	10-14-08
Sample Matrix:	Soil	Date Extracted:	10-20-08
Preservative:	Cool	Date Analyzed:	10-21-08
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	0.2

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:

Rosa 165C.

Analyst

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EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

03-16-2009

Quality Assurance Report

Client:	QA/QC		Project #:		N/A
Sample ID:	10-21-08 QA/	QC	Date Reported:		10-26-08
Laboratory Number:	47738		Date Sampled:		N/A
Sample Matrix:	Methylene Chlo	ride	Date Received:		N/A
Preservative:	N/A		Date Analyzed:		10-21-08
Condition:	N/A		Analysis Reques	ted:	TPH
memor additioned being defende best to the Baskalest else.	end Color & Street West (Assessment) (Asses Street) (Asses Street)	The contributes of the party of the contributes of	inger en derlage depublic d'Montebourberennes eddespillade	mentaritation are un alleristication	atto Cota, 190 to 6 % & was more
	Cal Date	I-Cal RF	C-Cal RF:	% Difference	Accept Range
Gasoline Range C5 - C10	05-07-07	9.8731E+002	9.8771E+002	0.04%	0 - 15%
Diesel Range C10 - C28	05-07-07	1.0085E+003	1.0089E+003	0.04%	0 - 15%
		CTT IS AS ALCOHOLOGIC	9865683559355935596363636		
Blank Conc. (mg/L - mg/Kg)		Concentration		Detection Lin	
Gasoline Range C5 - C10		ND		0.2	
Diesel Range C10 - C28		ND		0.1	-
Total Petroleum Hydrocarbons		ND		0.2	
Duplicate Conc. (mg/kg)	Sample	Duplicate	% Difference	Accept Rance	
Gasoline Range C5 - C10	ND	ND	0.0%	0 - 30%	XX
Diesel Range C10 - C28	ND	ND	0.0%	0 - 30%	
-		•••	5.5.7		
Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept Range
Gasoline Range C5 - C10	ND	250	253	101%	75 - 125%
Diesel Range C10 - C28	ND	250	249	99.6%	75 - 1 25 %

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 47738, 47739, 47759 - 47763, 47776, and 47789.

Line 1

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	WPX	Project #:	04108-0003
Sample ID:	Pit Exc.	Date Reported:	10-26-08
Laboratory Number:	47738	Date Sampled:	10-13-08
Chain of Custody:	5553	Date Received:	10-14-08
Sample Matrix:	Soil	Date Analyzed:	10-21-08
Preservative:	Cool	Date Extracted:	10-20-08
Condition:	Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)	
Benzene	2.9	0.9	r.
Toluene	10.6	1.0	
Ethylbenzene	5.9	1.0	a
p,m-Xylene	14.9	1.2	
o-Xylene	6.3	0.9	
Total BTEX			

ND - Parameter not detected at the stated detection limit.

Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	99.0 %
	1,4-difluorobenzene	99.0 %
	Bromochlorobenzene	99.0 %

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:

Rosa 165C.



EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #	N/A
Sample ID:	10-21-BT QA/QC	Date Reported:	10-26-08
Laboratory Number:	47738	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	10-21-08
Condition .	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	1-Cal RF	C-Cál RF Áccept Ranc	%Diff je 0 -45%	Blank Conc	Detect. Limit
Benzene	5.3023E+007	5 3130E+007	0.2%	ND	0.1
Toluene	4.2719E+007	4.2805E+007	0.2%	ND	0.1
Ethylbenzene	3.2101E+007	3.2166E+007	0.2%	ND	0.1
p,m-Xylene	6.8288E+007	6.8425E+007	0.2%	ИD	0.1
o-Xylene	3,0913E+007	3.0975E+007	0.2%	ND	0.1

Duplicate Conc. (ug/Kg)	Sample	uplicate	%DIffs.	Accept Range	Deleat Limit
Benzene	2.9	3.1	6.9%	0 - 30%	0.9
Toluene	10.6	10.8	1.9%	0 - 30%	1.0
Ethylbenzene	5.9	6.0	1.7%	0 - 30%	1.0
p,m-Xylene	14.9	16.9	13.4%	0 - 30%	1.2
o-Xylene	6.3	6.1	3.2%	0 - 30%	0.9

Spike Conc (ug/Kg)	Sample 2 Amo	uint Spikea (Spik	ed/Sample	% Recovery	Accept Range
Benzene	2.9	50.0	51.9	98.1%	39 - 150
Toluene	10.6	50.0	55.6	91.7%	46 - 148
Ethylbenzene	5.9	50.0	53.9	96.4%	32 - 160
p,m-Xylene	14.9	100	107	93.0%	46 - 148
o-Xylene	6.3	50.0	53.3	94.7%	46 - 148

ND - Parameter not detected at the stated detection limit.

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

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 47738, 47739, 47759 - 47762, 47776, and 47789.

NOTECH LABS

EPA METHOD 418.1 TOTAL PETROLEUM HYDROCARBONS

03-16-2009

Client:	WPX	Project #:	04108-0003
Sample ID:	Pit Exc	Date Reported:	10-21-08
Laboratory Number:	47738	Date Sampled:	10-13-08
Chain of Custody No:	5553	Date Received:	10-14-08
Sample Matrix:	Soil	Date Extracted:	10-20-08
Preservative:	Cool	Date Analyzed:	10-20-08
Condition:	Intact	Analysis Needed:	TPH-418.1

		Det.
	Concentration	Limit
Parameter	(mg/kg)	(mg/kg)

Total Petroleum Hydrocarbons

55.3

5.0

ND = Parameter not detected at the stated detection limit.

References:

Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water

and Waste, USEPA Storet No. 4551, 1978.

Comments:

Rosa 165C.

Analyst



EPA METHOD 418.1 TOTAL PETROLEUM HYROCARBONS QUALITY ASSURANCE REPORT

Client:

QA/QC

Project #:

N/A

03-16-2009

Sample ID:

QA/QC

Date Reported:

10-22-08

Laboratory Number:

Line 1

10-20-TPH.QA/QC 47767

Date Sampled:

N/A

Sample Matrix: Preservative:

Freon-113 N/A

Date Analyzed: Date Extracted: 10-20-08 10-20-08

Condition:

N/A

Analysis Needed:

TPH

Calibration

I-Cal Date

C-Cal Date

I-Cal RF:

C-Cal RF:

% Difference

Accept. Range

10-06-08

10-20-08

1,770

1,790

1.1%

+/- 10%

Blank Conc. (mg/Kg) **TPH**

Concentration

Detection Limit

ND

5.0

Duplicate Conc. (mg/Kg)

Sample

Duplicate

% Difference

Accept. Range

TPH

18.4

14.2

22.8%

+/- 30%

Spike Conc. (mg/Kg) **TPH**

Sample

Spike Added Spike Result % Recovery Accept Range 2,000

2,410

119%

80 - 120%

ND = Parameter not detected at the stated detection limit.

References:

Method 418.1, Petroleum Hydrocarbons, Total Recoverable, Chemical Analysis of Water

and Waste, USEPA Storet No. 4551, 1978.

Comments:

QA/QC for Samples 47723, 47724, 47737 - 47739 and 47767 - 47769.

5796 U.S. Highway 64 • Farmington, NM 87401 • Tel 505-632-0615 • Fax 505-632-1865

Chloride

WPX Client: Sample ID: Pit Exc. Lab ID#: 47738 Sample Matrix: Soil Preservative:

Cool Intact Project #: Date Reported:

Date Sampled: Date Received:

Date Analyzed: Chain of Custody: 10-27-08 10-13-08 10-14-08

04108-0003

03-16-2009

10-22-08 5553

Parameter

Concentration (mg/Kg)

Total Chloride

65.0

Reference:

Condition:

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:

Rosa 165C.

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CHAIN OF CUSTODY RECORD

5553

Client: Project Name / Location: Resa /65C									ANALYSIS / PARAMETERS														
Client Address:	·										Γ_	1	1		<u> </u>		1		Γ	Г			
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Client No.:					1108-0	0003			TPH (Method 8015)	(Meth	VOC (Method 8260)	8 Me	/ Anic		TCLP with H/P		418.1	CHLORIDE				Sample Cool	e Inta
Sample No./	Sample	Sample	Lab No.	No.	ample	No./Volume Prese		rvative	Ĭ	BTEX (Method 8021)	စြွ	RCRA 8 Metals	Cation / Anion	5	Ę,	Į	TPH (418.1)	ᅙ				Ta l	Sample Intact
Identification	Date	Time			Matrix	of Containers	HgCl ₂ HCi		🖺		>			湿	12	PAH				$\perp \perp \parallel$		Š	
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					SGT.				
					BGT,				
Date	WellName	Run	Formation	Construction	Above	Y/N	level	level	Comments / Repairs needed
	ROSA UNIT								
8/14/2008	#165C	04-52	Mesa Verde	Fiberglass	BGT	Y	3' 2-1/2"	3'	Pit replaced with Steel Above Ground Tank

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