



# AE Order Number Banner

## Report Description

This report shows an AE Order Number in Barcode format for purposes of scanning. The Barcode format is Code 39.



**App Number:** pENV00003RP364

**3RP - 364**

**WILLIAMS FOUR CORNERS, LLC**

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 19.19.29 NMAC.

NOV 07 2016

**Release Notification and Corrective Action**

**OPERATOR**

☒ Initial Report ☐ Final Report



Name of Company: Williams Four Corners LLC	Contact: Matt Webre	
Address: Arroyo 1755 Arroyo Drive, Bloomfield, NM 87413	Telephone No.: (505) 632-4442	
Facility Name: Florance Gas Com J No. 16A	Facility Type: Pipeline	
Surface Owner: BLM	Mineral Owner	API No. 30-045-21790

**LOCATION OF RELEASE**

Unit Letter P	Section 6	Township 30N	Range 9W	Feet from the	North/South Line	Feet from the	East/West Line	County San Juan
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Latitude 36.835162° N Longitude -107.816092° W

**NATURE OF RELEASE**

Type of Release: Natural Gas Condensate/Produced Water	Volume of Release:	Volume Recovered:
Source of Release: Historical natural gas gathering operations	Date and Hour of Occurrence:	Date and Hour of Discovery:
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? N/A	
By Whom? N/A	Date and Hour: N/A	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. Not Applicable	
If a Watercourse was Impacted, Describe Fully.*  Not Applicable		
Describe Cause of Problem and Remedial Action Taken.*  Historical release(s) in area impacted soil and groundwater at the well location.		
Describe Area Affected and Cleanup Action Taken.*  OCD required both BP and Williams to perform remediation within a required timeframe as described in the OCD letter dated October 6, 2016. The attached remediation plan describes the proposed soil remediation plan Williams will follow to address soil impacts.		
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: 	OIL CONSERVATION DIVISION	
Printed Name: Matt Webre	Approved by Environmental Specialist: 	
Title: EHS Supervisor	Approval Date: 11-7-16	Expiration Date:
E-mail Address: matt.webre@williams.com	Conditions of Approval: See Attached	Attached <input checked="" type="checkbox"/>
Date: 10/26/2016 Phone: (505) 632-4442	Assigned to 3RP-364	

\* Attach Additional Sheets If Necessary

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October 26, 2016

Mr. Matt Webre  
Williams Four Corners LLC  
1755 Arroyo Drive  
Bloomfield, New Mexico 87413

**RE: Proposed Soil Shredding Remediation Work Plan  
Florance Gas Com J #16A  
API # 30-045-21790  
Williams Four Corners LLC  
San Juan County, New Mexico**

Dear Mr. Webre:

LT Environmental, Inc. (LTE) has prepared this Remediation Work Plan for Williams Four Corners LLC (Williams) to address hydrocarbon impacts to soil at the Florance Gas Com J #16A natural gas well using soil shredding. The legal site description is Section 6, Township 30 North, Range 9 West, New Mexico Principal Meridian. The work plan is being generated at the request of Williams in response to a letter dated October 6, 2016 from the New Mexico Oil Conservation Division (NMOCD) requiring Williams and BP America Production Company (BP) to remediate soil and groundwater impacted by historical releases and operations at the Site. Based on previous site investigations conducted by both parties, the NMOCD separated the Site into an area to be addressed by Williams (generally south of a former below grade tank [BGT] operated by Williams) and an area to be addressed by BP (generally north of the former BGT operated by Williams). This proposed remediation work plan applies to the requirement to remediate horizontally and vertically the Williams area of responsibility.

### **Proposed Remediation**

LTE proposes to utilize soil shredding remediation technology to treat the petroleum impacted soil with the following procedures:

1. LTE will direct the excavation, using visual observations and field screening to segregate the impacted soil from the clean overburden.
2. All clean overburden will be stockpiled for use as backfill. Any topsoil will be segregated and reused.
3. All impacted soil will be stockpiled in 100-yard intervals for the first 1,000 yards removed and then in 500-yard intervals after the initial 1,000 yards is successfully remediated according to the sampling schedule presented in the subsequent section.
4. The stockpiles of impacted soil will be bermed with clean fill to prevent potential impacts from migrating offsite due to stormwater runoff.



5. Impacted soil will be processed through a shading bucket attached to an excavator that macerates, or "shreds" the soil into a uniform soil size before it is emptied into a grizzly shaker screen to further segregate the soil.
6. A hydrogen peroxide solution ranging from 1 percent (%) to 10% hydrogen peroxide by weight in water will be applied to soil on a conveyor belt with multiple spray nozzles.
7. The treated soil will be stockpiled on-site and left to rest for at least 24 hours to allow the hydrogen peroxide to continue oxidizing the hydrocarbons.
8. Treated soil will be sampled according to the sampling schedule presented below to confirm remediation.
9. As long as soil analytical results indicate treated soil and excavation confirmation soil samples meet the applicable remediation action levels stated above, LTE will return the treated soil to the excavation for use as backfill.
10. Once all treated soil has been returned to the excavation, removed overburden will be applied, then any topsoil. LTE will compact the backfill to 90%.

### **Soil Sampling**

The following soil sampling will be conducted during remediation:

1. During source removal activities, LTE will collect confirmation soil samples from the sidewalls and floor of the excavation. These confirmation soil samples will be representative of the excavation, typically spaced at 50-foot centers along the sidewalls. Excavation floor samples will be collected approximately one sample per 1,250 square feet.
2. LTE will collect composite soil samples at a rate of 1 composite sample per 100 yards of treated soil, for the first 1,000 yards of treated soil. Based on the performance of the first 1,000 yards of treated material, subsequent composite soil samples will be collected every 500 yards of treated soil.
3. The area where treated soil is stockpiled will also be sampled upon completion of all remediation activities. The top 0 to 6 inches of the vadose zone beneath any areas where impacted and treated material was stockpiled will be segregated into agreed upon areas, representative of their size, between Williams, LTE, and the applicable regulators. Composite soil samples will be collected from each representative area.
4. The composite soil samples will be collected in laboratory provided sample containers, placed on ice, and sent to Hall Environmental Analysis Laboratory (Hall) of Albuquerque, New Mexico, under chain of custody protocol for analysis of benzene, toluene, ethylbenzene, and total xylenes (BTEX) by United States Environmental Protection Agency (US EPA) Method 8021B, total petroleum hydrocarbon (TPH)-gasoline range organics (GRO), TPH-diesel range organics (DRO), and TPH-motor oil range organics (MRO) by US EPA Method 8015M/D. The samples will be rushed on a 24-hour turnaround-time so analytical results are received the next business day.
5. All sample locations and pertinent excavation information will be mapped using a Trimble 6000 Series GPS unit capable of sub-meter accuracy.





6. All confirmation soil samples will be collected by LTE in the presence of one or more regulatory agencies, if possible, at pre-arranged meeting times.

#### **Reporting and Communication**

LTE will track the volumes of soil excavated, treated, and sampled, as well as provide daily updates with samples collected and laboratory analytical results to Williams and the state regulators. Backfill of treated material will not occur without approval from NMOCD and Bureau of Land Management. Following completion of backfill and vadose sampling, a summary report requesting closure for this Site will be submitted to the NMOCD.

LTE appreciates the opportunity to provide environmental services to Williams. If you have any questions regarding this report, please contact us at (970) 385-1096.

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  
Four Corners Office Manager

## Smith, Cory, EMNRD

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**From:** Smith, Cory, EMNRD  
**Sent:** Friday, October 28, 2016 10:02 AM  
**To:** 'Webre, Matt'  
**Cc:** Perrin, Charlie, EMNRD; Powell, Brandon, EMNRD; Fields, Vanessa, EMNRD; Deimer Katherina (kdiemer@blm.gov); Thomas, Leigh; Lucero, Christopher; Templeton, Charles; Hannan, Michael  
**Subject:** RE: Florance Gas Com J #16A 30-045-21790 OCD Response Letter.

Matt,

After reviewing the remediation plan submitted via email on 10/26/16 for the Florance Gas Com J #16A (30-045-21790) the remediation plan has been approved with the following conditions of approval.

- Williams will notify the OCD at least 24 hours prior to any conformation soil sampling events.
- Confirmation soil samples will be collected on the base and sidewalls. At a minimum, 1 (5) point composite sample will be collected every 625 square feet with the sampling area not to exceed 25 linear feet in any direction. Additionally any lens or areas of the excavation that exhibit impacts may be required to be discretely sampled. Based upon site conditions, and nature of the excavation an alternative sampling plan may be approved.
- Williams will collect at a minimum 1, (5) point composite sample per 100 cubic yards that is a good representative of the entire stock pile.
- Once a baseline of 1,000 cubic yards of soil is consistently and successfully treated, Williams may decrease the sampling frequency to 1 (5) point composite sample per 500 cubic yard upon reviewing the sampling results with the NMOCD.
- Until Williams consistently and successfully treats 1,000 cubic yards, soil stock piles will be kept in distinguishable 100 cubic yard piles, upon completion 500 cubic yard piles will be acceptable.

Please submit the plan via hard copy or email with a signed C-141 so that we may scan it into our digital system.

OCD approval of Williams Remediation plan does not relive Williams of any other requirements imposed by other regulatory agencies

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](mailto:cory.smith@state.nm.us)

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[cory.smith@state.nm.us](mailto:cory.smith@state.nm.us)

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**From:** Webre, Matt [mailto:Matt.Webre@Williams.com]

**Sent:** Wednesday, October 26, 2016 8:28 AM

**To:** Smith, Cory, EMNRD <Cory.Smith@state.nm.us>

**Cc:** Perrin, Charlie, EMNRD <charlie.perrin@state.nm.us>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; Deimer Katherina (kdiemer@blm.gov) <kdiemer@blm.gov>; Thomas, Leigh <l1thomas@blm.gov>; Lucero, Christopher <Christopher.Lucero@Williams.com>; Templeton, Charles <Charles.Templeton@Williams.com>; Hannan, Michael <Michael.Hannan@Williams.com>

**Subject:** RE: Florance Gas Com J #16A 30-045-21790 OCD Response Letter.

Cory,

Attached is the work plan that LTE provided to Williams to complete the soil remediation at the site.

Unfortunately I have to take PTO today due to a personal matter. If you have any comments you need to address prior to our meeting tomorrow, please send them via email and I will try to respond.

Thanks,



**Matt Webre, PG** | Williams | Supervisor EH&S | Operational Excellence

Office: 505-632-4442 | Cell: 505-215-8059 | 1755 Arroyo Drive, Bloomfield, NM 87413

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**From:** Smith, Cory, EMNRD [mailto:Cory.Smith@state.nm.us]

**Sent:** Thursday, October 06, 2016 8:04 AM

**To:** Moskal, Steven <Steven.Moskal@bp.com>; Webre, Matt <Matt.Webre@Williams.com>

**Cc:** Perrin, Charlie, EMNRD <charlie.perrin@state.nm.us>; Powell, Brandon, EMNRD <Brandon.Powell@state.nm.us>; Fields, Vanessa, EMNRD <Vanessa.Fields@state.nm.us>; Deimer Katherina (kdiemer@blm.gov) <kdiemer@blm.gov>; Thomas, Leigh <l1thomas@blm.gov>

**Subject:** Florance Gas Com J #16A 30-045-21790 OCD Response Letter.

Good morning all,

Attached is a copy of the letter that was mailed out this morning to both Operators in regards to the Florance Gas Com J #16A soil and ground water remediation.

If you have questions please give me call.

Cory Smith  
Environmental Specialist  
Oil Conservation Division  
Energy, Minerals, & Natural Resources  
1000 Rio Brazos, Aztec, NM 87410  
(505)334-6178 ext 115