

OIL CONS. DIV DIST. 3

FEB 08 2018



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Email and US Mail

January 29, 2018

Mr. Cory Smith
Environmental Specialist
New Mexico Oil Conservation Division
1000 Rio Brazos
Aztec, NM 87410

CS
2/20/18

Re: Florance Gas Com J16A – Conditions of Approval for Proposed Remediation Plan

Dear Mr. Smith,

In response to the conditions of approval Williams Four Corners LLC (Williams) received from the New Mexico Oil Conservation Division (OCD) dated January 26, 2018, Williams is submitting this letter requesting changes and/or additional clarification on the OCD requirements.

OCD Conditions of Approval

1. Additional ground water plume delineation in the areas surrounding MW-14, 19, and 21. Completed no later than May 21, 2018.

Response: It is Williams position that the groundwater impacts beneath BP's operations are from their sources and thus their responsibility. As presented in the Remedial Assessment Report, the investigation data show the groundwater flow is to the southeast and therefore it's more likely that benzene impacts observed in MW-21 are migrating southeast contributing to the benzene plume beneath Williams operations. Soil and groundwater data collected to date do not support the idea that Williams sources are responsible for the impacts in MW-21. Please provide additional clarification for this condition.

Williams requests that the OCD allow MW-14 to be the southernmost point of compliance. Benzene concentrations during the June 2017 and October 2017 monitoring events were 11 ug/L and 12 ug/L, which only slightly exceeds the 10 ug/L cleanup standard. Further delineation will be difficult due to topography, cause additional surface damage, and require a lengthy BLM approval process.

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

Heather Riley, Division Director
Oil Conservation Division



**New Mexico Oil Conservation Division approval and conditions
listed below are made in accordance with OCD Rule 19.15.5.11**

February 20, 2018

Re: Florance Gas Com J16A – Conditions of Approval for Proposed Remediation Plan

Dear Mr. Galer,

In response to the letter New Mexico Oil Conservation Division (OCD) received from the Williams Four Corners LLC (Williams) dated February 8, 2018.

Williams Response: It is Williams position that the groundwater impacts beneath BP's operations are from their sources and thus their responsibility. As presented in the Remedial Assessment Report, the investigation data show the groundwater flow is to the southeast and therefore it's more likely that benzene impacts observed in MW-21 are migrating southeast contributing to the benzene plume beneath Williams operations. Soil and groundwater data collected to date do not support the idea that Williams sources are responsible for the impacts in MW-21. Please provide additional clarification for this condition.

Williams requests that the OCD allow MW-14 to be the southernmost point of compliance. Benzene concentrations during the June 2017 and October 2017 monitoring events were 11 ug/L and 12 ug/L, which only slightly exceeds the 10 ug/L cleanup standard. Further delineation will be difficult due to topography, cause additional surface damage, and require a lengthy BLM approval process.

OCD Response:

- OCD approves Williams request for MW-14 to be considered delineated so long as groundwater conditions do not deteriorate significantly.
- Williams will delineate further in areas MW-19 and 21 as previously approved.

If you have any questions please feel free to contact me at your leisure.


NMOCD Approved by Signature

February 20, 2018
Date

The BLM application to amend the right-of-way agreement for the installation of one additional monitoring well to complete delineation near MW-19 was submitted in December 2017. Our ability to meet the given deadline requires that we receive BLM approval with enough lead time to schedule the fieldwork.

2. Williams will follow their proposed remediation plan time line with the installation of SVE equipment and must start SVE and DPE operations no later than April 27, 2018.

Response: Williams is working with the Farmington Electric Utility to upgrade the power at the site. Once power supply is confirmed, Williams will initiate the equipment procurement process and be subject to vendor lead times while the remediation system is constructed. Date of installation and startup is subject to outside vendors schedule. At this time, Williams believes the deadline is achievable.

3. Williams will maintain a SVE runtime greater than or equal to 90% per quarter.

Response: Williams agrees this requirement is achievable.

4. Williams will collect an initial gas sample for laboratory analysis shortly after the startup of SVE operation and then a quarterly sample thereafter. The gas sample will be analyzed for EPA Method 8260 Full List and include Carbon dioxide and Oxygen.
 - a. The gas sample port needs to be installed prior to the inlet of the vacuum pump but, after the convergence of all SVE wells

Response: Williams accepts this condition.

5. Williams will submit to OCD District III a quarterly update report detailing remediation operations the report will include at a minimum.
 - a. Summary of remediation activity for the quarter
 - b. SVE run time
 - c. SVE mass removal and product recovery
 - d. DPE volume removal and product recovery
 - e. Amount of Liquids captured from the concrete trap/Secondary Seep tank
 - f. Gas sample Analysis

Response: Williams accepts this condition.

6. Williams will submit a typical annual ground water report to Santa Fe 3RP-364.

Response: Williams accepts this condition.

7. OCD may request additional active remediation on any monitoring well with groundwater contaminates above WQCC standards at a later date.

Response: Williams accepts this condition.

Mr. Smith
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Williams is committed to compliance and will continue to work towards remediating this site. Please provide a response to our concerns in condition of approval #1. Please contact me at Aaron.Galer@Williams.com or (801) 584-6746 with any questions regarding this response.

Respectfully,

A handwritten signature in blue ink that reads "Aaron Galer". The signature is written in a cursive style with a stylized "A" and "G".

Aaron Galer
Environmental Specialist

cc: Brandon Powell, OCD