

**GW - 60**

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**PERMITS,  
RENEWALS,  
& MODS**

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

Hereby acknowledge receipt of check No. \_\_\_\_\_ dated 11/18/10

or cash received on \_\_\_\_\_ in the amount of \$ 100.00

from Williams Food Carriers

for GW-060

Submitted by: Lawrence Rocco Date: 12/16/10

Submitted to ASD by: Sharon Thomas Date: 12/16/10

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee ☒ New Facility \_\_\_\_\_ Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_



Aaron Dailey  
Williams Four Corners, LLC  
188 County Road 4900  
Bloomfield, NM 87413  
505-632-4708 (office)

November 22, 2010

Mr. Glen von Gonten  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Subject: Discharge Plan Renewal Application  
Williams Four Corners, LLC Milagro Plant (GW-060)

Dear Mr. von Gonten:

Williams Four Corners, LLC submitted the Discharge Plan renewal application for the Milagro Plant (GW-060) to you via email on November 22, 2010. A copy of the email was also forwarded to Brandon Powell, OCD District 3.

Enclosed please find a check for \$100 to cover the filing fee for the application.

If any additional information is needed, please contact me at (505) 632-4708.

Sincerely,

A handwritten signature in black ink, appearing to be "A. Dailey". The signature is fluid and cursive, with the first letter of the first name being a large, stylized "A".

Aaron Dailey  
Environmental Specialist

## **Lowe, Leonard, EMNRD**

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**From:** Dailey, Aaron [Aaron.Dailey@williams.com]  
**Sent:** Monday, November 22, 2010 2:00 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** VonGonten, Glenn, EMNRD; Powell, Brandon, EMNRD; Potochnik, Mark; Deklau, Ingrid  
**Subject:** Williams GW 60 (Milagro); GW 233 (La Jara) OCD Renewal applications  
**Attachments:** Williams GW 60 Milagro OCD Renewal 11.22.2010.pdf; Williams GW 233 La Jara OCD Renewal 11.22.2010.pdf

Leonard,

Please find the attached Discharge Plan renewal applications for the Williams Milagro (GW 60) and the Williams La Jara (GWW 233) facilities. Please contact me if you have any questions.

Thanks,

aaron

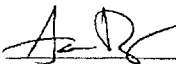
**Aaron Dailey**  
Environmental Specialist  
Williams Four Corners, LLC  
Office: (505)632-4708  
Cell: (505)787-0719  
Fax: (505)632-4781  
[aaron.dailey@williams.com](mailto:aaron.dailey@williams.com)

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES,  
COMPRESSOR, GEOTHERMAL FACILITIES  
AND CRUDE OIL PUMP STATIONS**

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New      ☒ Renewal      ☐ Modification

1. Type: Compressor Station (Milagro Plant, GW-60)
2. Operator: Williams Four Corners, LLC  
Address: 188 CR 4900, Bloomfield, NM 87413  
Contact Person: Aaron Dailey      Phone: 505-632-4708
3. Location: W/2 SE/4 Section 12      Township 29 North      Range 11 West  
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Aaron Dailey; Signature:       Title: Environmental Specialist  
E-mail Address: aaron.dailey@williams.com      Date: 11/22/2010



Aaron Dailey  
Williams Four Corners, LLC  
188 County Road 4900  
Bloomfield, NM 87413  
505-632-4708 (office)

November 22, 2010

Mr. Glen von Gonten  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Subject: Discharge Plan Renewal Application  
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Enclosed please find a check for \$100 to cover the filing fee for the application.

If any additional information is needed, please contact me at (505) 632-4708.

Sincerely,

A handwritten signature in black ink, appearing to be "A. Dailey".

Aaron Dailey  
Environmental Specialist



## **Milagro Plant**

### **NMOCD Discharge Plan GW-060 Renewal**

**Williams Four Corners, LLC  
188 CR 4900  
Bloomfield, NM 87413**

November 2010

**Item 1**

*Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant (CO<sub>2</sub> removal) and compressor station include the total combined site rated horsepower.*

The Milagro Plant is owned and operated by Williams Four Corners, LLC (Williams). It is located approximately 2.5 miles east of Bloomfield, New Mexico. Constructed in 1991, the plant consists of a natural gas conditioning and a cogeneration plant. The gas conditioning plant is designed to remove carbon dioxide and water from raw natural gas. Plant processes include gas dehydration using triethylene glycol; carbon dioxide removal by contacting natural gas with methyldiethanolamine (MDEA); and glycol and MDEA regeneration. The processes used to separate hydrocarbons from field gas include heat exchangers, separators, dehydrators, above ground storage tanks, and other supporting equipment.

The cogeneration plant generates electricity using natural gas fuel. The exhaust gas heat is used to generate steam for use in the gas conditioning plant. In addition, there are various storage tanks, support structures and ancillary equipment.

**Item 2**

*Name of operator or legally responsible party and local representative.*

<b>Legally Responsible Party/ Operator</b>	Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 632-4600/4634 (800)-645-7400 (24 hour emergency notification)
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<b>Local Representative</b>	Aaron Dailey Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 642-4708
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**Item 3**

*Give a legal description of the location and county. Attach a large-scale topographic map.*

San Juan County, New Mexico  
Township 29 North, Range 11 West, W/2 SE/4 Section 12  
The topographic map is attached as Figure 1.

**Item 4**

*Attach the name, telephone number and address of the landowner of the facility site.*

The site is on a permanent easement owned by: Williams

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**Item 5**

*Attach a description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.*

Still vent emissions at the Plant have been re-routed through a Vapor Recovery Unit (VRU). As such, a 4200 gallon condensate tank has been installed at the Plant to store the stabilized hydrocarbon condensate from the dehydrator VRU.

There have been no other modifications to this section. See information on-file at OCD. The facility plot plan is included with this document as Figure 2.

**Item 6**

*Attach a description of all materials stored or used at the facility.*

Table 1 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

MSDSs for materials at the site will be maintained in Williams' corporate office and will be available upon request.

**Item 7**

*Attach a description of present sources of effluent and waste solids. Average quality and daily volume of wastewater must be included.*

The source, quantity, and quality of effluent and waste solids expected to be generated at the compressor station are summarized in Table 2.

**Item 8**

*Attach a description of current liquid and solid waste collection/treatment/disposal procedures.*

There have been no modifications except that used oil filters and oil soaked pads and socks will be recycled per OCD regulations, and a 4200 gallon condensate tank has been installed. This is reflected in Table 1, which describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site. See additional information on-file at OCD.

**Item 9**

*Attach a description of proposed modifications to existing collection/treatment/disposal systems.*

No modifications to the facility are necessary to meet NMOCD requirements.

**Item 10**

*Attach a routine inspection and maintenance plan to ensure permit compliance.*

There have been no modifications to this item. See information on-file at OCD.

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**Item 11**

*Attach a contingency plan for reporting and clean up of spills or releases.*

There have been no modifications to this item. See information on-file at OCD.

**Item 12**

*Attach ecological/hydrological information for the facility. Depth to and quality of groundwater must be included.*

The table below has been updated based on a current well search that was performed using the New Mexico Office of the State Engineer's WATERS Database(1) for this renewal application. Information on the documented water wells in the vicinity of the Milagro Plant is presented in the table below. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 2800-3200 parts per million. Depth to groundwater is expected to be at least 40 feet. See additional information on-file at OCD.

The table below presents available information provided for the wells 0.5 – 1 mile from the site.

Township; Range; Section	Quarter <sup>a</sup>	Apx. Distance from Site (mi)	Well #	Use <sup>b</sup>	Well Depth (ft)	Water Bearing Stratifications (ft)	Description	Depth to Water (ft)
29N; 11W; 14	322	~0.5-1	SJ 00007	Ind	752	435-496; 510-735; 736-752	Other/Unknown	
29N; 11W; 13	N1/2 of 4	0.5 – 0.75	SJ 00987	Dom	415	410-415	Sandstone/Gravel/Conglomerate	300
29N; 11W; 14	41	~1	SJ 01426	Dom	155	120-155	Sandstone/Gravel/Conglomerate	10
29N; 11W; 14	124	~1	SJ 03164	Dom	75	65-75	Sandstone/Gravel/Conglomerate	56
29N; 11W; 14	124	~1	SJ 03175	Dom	60	24-60	Sand and Clay	24
29N; 10W; 18	131	~0.5	SJ 03023	Dom	90	80-90	Sand and Gravel	65

Note a: 1=NW/4; 2=NE/4; 3=SW/4; 4=SE/4 from smallest to largest (eg. Q/64; Q/16; Q/4)

Note b: Dom = domestic; Ind = industrial

**References**

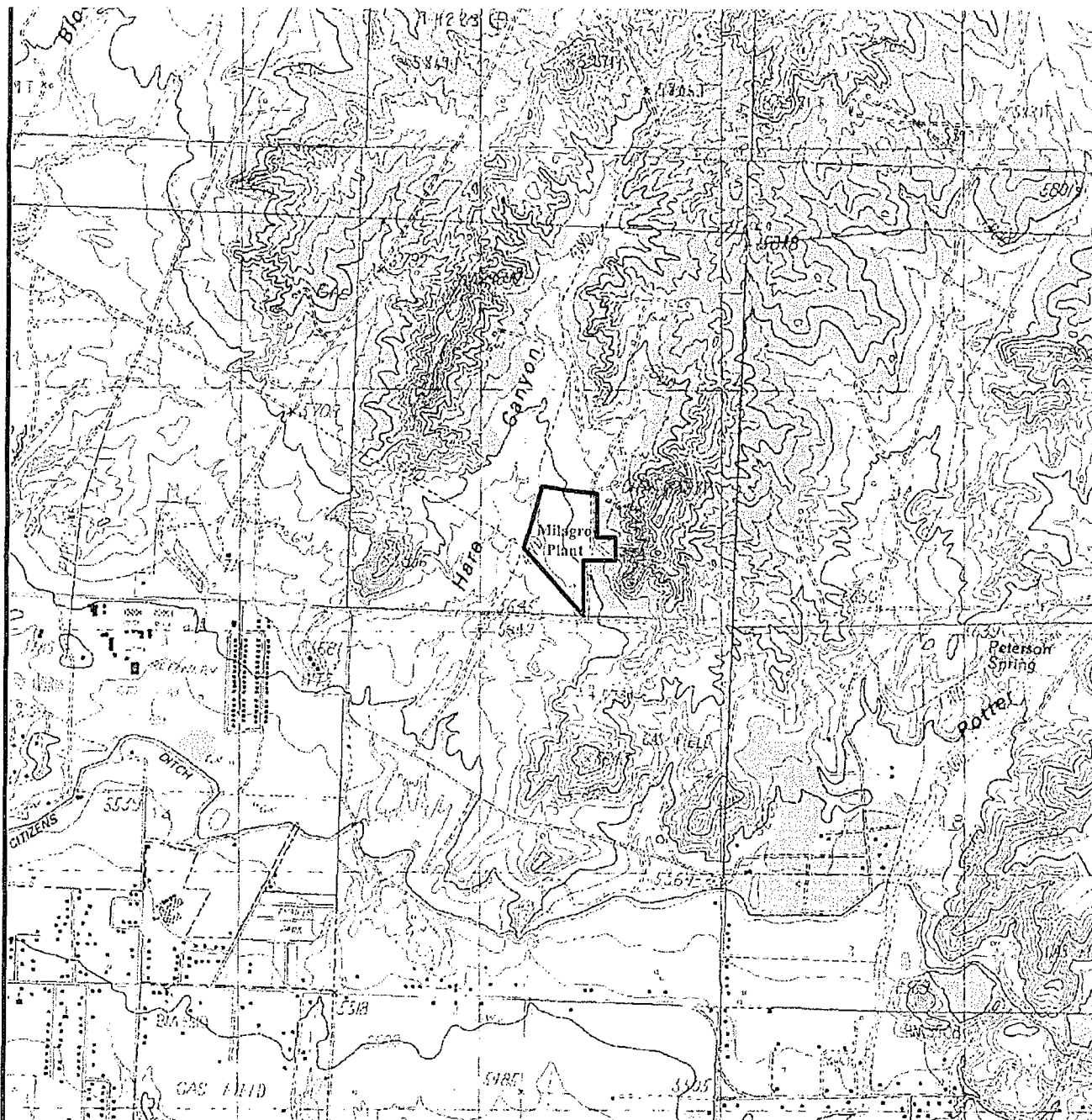
<sup>1</sup>Online Well Reports and Downloads, New Mexico Office of the State Engineer, search performed 11/7//2010.

<sup>2</sup>Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

**Item 13**

*Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.*

There have been no modifications to this section. See information on-file at OCD.



Source: USGS Aztec and Bloomfield, NM Quadrangles

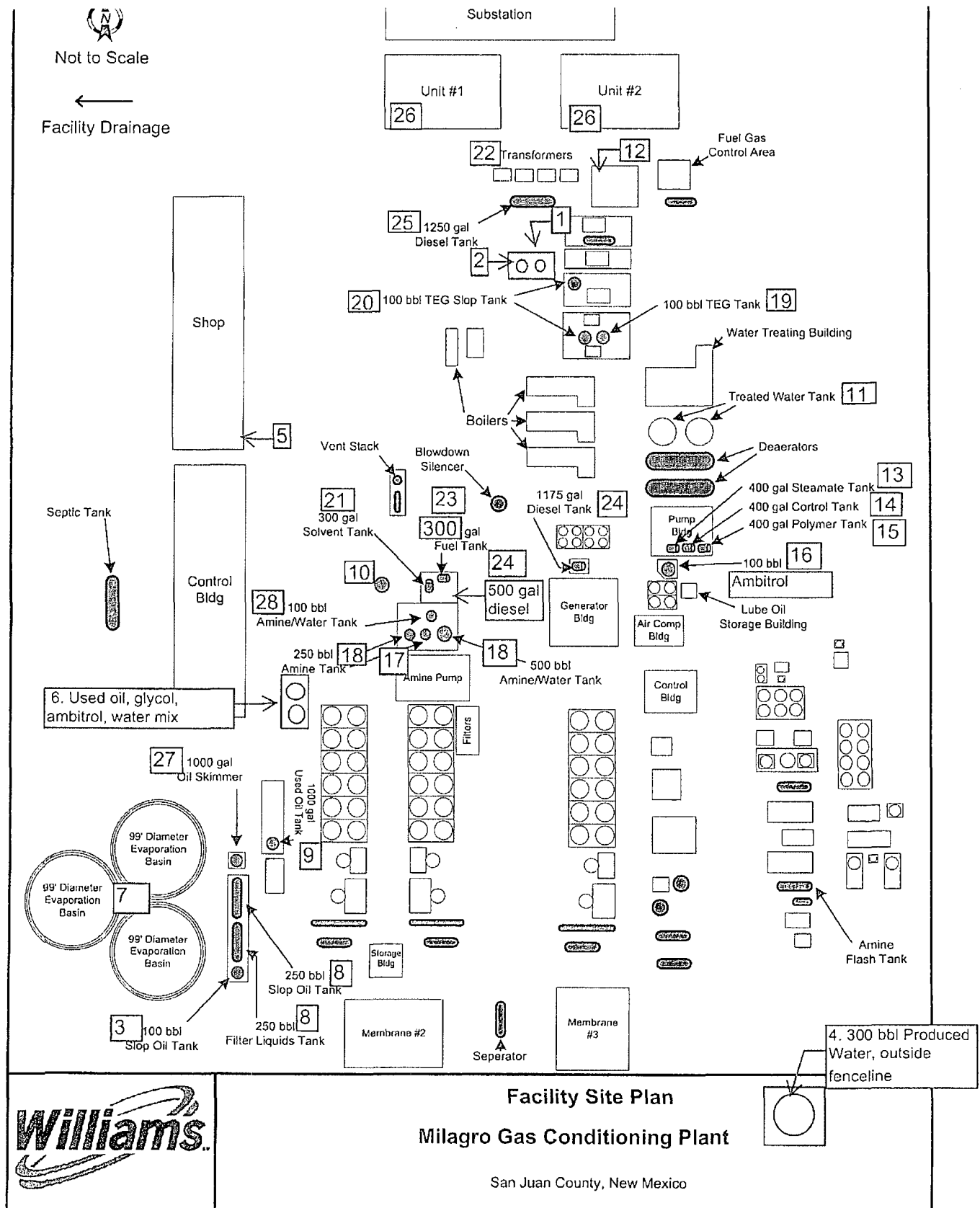
0 2000  
Scale (Feet)



## Figure 1 Site Vicinity / Topographic Map

### Milagro Plant

Section 12, Township 29N Range 11W  
San Juan County, New Mexico



**Table 1**  
**Transfer, Storage and Disposal of Process Fluids, Effluent and Waste Solids**

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
1. Condensate	Above ground storage tank	4200 gal	Concrete Berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
2. Produced Water	Below grade	2100 gal	Dual-walled, steel	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
3. Slop Oil Tank	Above ground storage tank	100 bbl	Double-walled tank	Exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered oil marketer for recycling. If necessary, may be transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste.
4. Produced Water Tank	Above ground storage tank	300 bbl	Earth/gravel berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
5. QA/QC Room Waste	Drum or other container	Varies	Berm	Non-exempt	Transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
6. Used Oil, Glycol, Ambitol, and Water Mixture	Above ground storage tank	2 @ 300 bbl	Mobile Tanks	Non-exempt	Transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
7. Evaporation Basins	Open basin	3 @ 211,000 gal	Lined basin with secondary containment	Exempt	Evaporation is performed at this facility, or it is transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
8. Slop Oil Storage Tank	Above ground storage tank	2 @ 10,500 gal	Concrete containment	Non-exempt	Transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
9. Used Oil	Above ground storage tank	1000 gal	Berm	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered oil marketer for recycling.
27. Oil Skimmer Tank	Above ground storage tank	1000 gal	Concrete containment	N/A	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered oil marketer for recycling. If necessary, may be transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste.
Used Oil Filters, Oil Soaked Pads & Socks	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other	Non-exempt	Used oil filters and oil soaked pads and socks will be recycled as required by OCD regulations.

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Spill Residue (i.e.; soil, gravel, etc.)	N/A	N/A	In situ treatment, land farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm or transported to Williams' or contractor facility	Non-exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
10.DI Water	Above ground storage tank	21,000 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
11.Treated Water	Above ground storage tank	2@ 21,000 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
12.Optisperse HP 5454 (Cogen)	Above ground storage tank	400 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
13.Steamate (Amine) Storage Tank	Above ground storage tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
14.Cortrol Storage Tank	Above ground storage tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
15.Polymer Storage Tank	Above ground storage tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
16.Ambitrol Mix	Above ground storage tank	4200 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
17.Amine Storage Tank	Above ground storage tank	10,500 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
18.Amine Mix Storage Tank (50-50 mix with deionized water)	Above ground storage tank	10,500 gal 500 bbl tank	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
19.TEG Storage Tank	Above ground storage tank	100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
20.TEG Mix Storage Tanks (50-50 mix with deionized water)	Above ground storage tank	2 @ 100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

Milagro Plant Discharge Plan – Table

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
21.Petroleum Solvent	Above ground storage tank	300 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
22.Dielectric Oil	Transformers	2 @ 4639 gal 2 @ 508 gal 4 @ 233 gal	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
23.Gasoline	Above ground storage tank	300 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
24.Diesel Fuel	Above ground storage tank	1175 gal 500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
25.Emergency Generator Diesel Fuel	Above ground storage tank	1250 gal	Inside semi-trailer with earthen containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
26.Turbine Lube Oil	Above ground storage tank	2 @ 2300 gal	Inside building with concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
28. Amine/Water Tank	Above ground storage tank	100 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

**Table 2**  
**Source, Quantity, and Quality of Effluent and Waste Solids**

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Condensate	Vapor Recovery Unit	200 - 1000 bbl/yr	No Additives
Produced Water	Inlet Separator, Drawn off Condensate Tank	200 - 5000 bbl/yr	May contain trace lube oil and/or glycol
Waste Water	Produced Water, Boiler Blowdown, Sulfinol Pump Building, Sulfinol Reclaimer, and selected process containment drains	1000-4000 gal/day	Water, Amine, Amine Salts, Glycol, and Storm Water
QA/QC Room Waste	Amine Testing	10-50 gal/yr	No additives
Slop Oil	Plant Waste Water Piping, Filter Drain Pad	1-10 bbl/mth	Used Oil, Glycol, Amine, and Antifreeze with no additives
Used Oil, Glycol, Amine, Antifreeze, and Water Mixture	Mobile Tanks, Facility Maintenance Projects	1-10 bbl/mth	Used Oil, Glycol, Amine, and Antifreeze with no additives
Used Solvent	Parts Cleaner, Pipeline Additive	0-50 gal/year	No additives
Used Oil	Turbines, Recip Engine, and Oil Skimmer	10-50 bbl/mth	Used Oil w/ No Additives
Used Oil Filters	Turbines	10-50/unit/year	No Additives
Used Process Filters	Charcoal (Activated Carbon)	20 tons/year	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol	1400-3000 filters/year	No Additives
Empty Drums/Containers	Liquid Containers	100-200/year	No Additives
Spill Residue ( i.e. soil, gravel, etc)	Incidental Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incidental Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives
Used/off-spec materials (eg. glycol, antifreeze, amine)	Dehydration and compression	0-200 gal/yr/material	No Additives



See attached DRAFT Public Notice, to include the following:

- Newspaper notice published in Farmington Daily Times in English and Spanish
- Landowner notice – N/A – applicant is the landowner

## PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in November 2010 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-060 for their Milagro Plant. The Plant is located in Section 12, Township 29 North, Range 11 West, in San Juan County, New Mexico, approximately 2.5 miles east of Bloomfield. The Plant consists of a natural gas conditioning and cogeneration plant.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of waste water generated is expected to be approximately 1000 – 4000 gallons per day. The facility does not discharge to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be at least 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 2800-3200 parts per million.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

## ATENCIÓN PÚBLICA

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, presentó una solicitud de renovación en noviembre de 2010 para el New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para previamente aprobado Discharge Plan GW-060 para su Milagro Planta. La planta está ubicada en la Sección 12, Municipio 29 Norte, Rango 11 West, en San Juan County, Nuevo México, aproximadamente 2.5 millas al este de Bloomfield. La planta consta de un gas natural acondicionado y cogeneración.

El plan se aborda cómo derrames serán manipulados. Materiales típicos generados o utilizados en la instalación incluyen gas natural condensado, agua producida, aceite, glicol y aceitosos agua de equipo de lavado. La cantidad de aguas residuales generada es de aproximadamente 1000 – 4000 galones por día. La instalación no libera los residuos líquidos a la superficie o las aguas subsuperficiales. Todos los desechos generados se temporalmente almacenados en tanques o contenedores equipados con contención secundaria. Residuos trasladados fuera será eliminado o reciclados en una instalación permitidas por estatales, federales, o tribales agencia para recibir esos residuos. La estimación de la profundidad del agua subterránea en el sitio se espera que sea por lo menos 40 pies. El total se disolvió se espera que la concentración de sólidos del agua subterránea de área esté en la variedad de 2800-3200 partes por millón.

Cualquier persona interesada o personas pueden obtener la información, presentar comentarios o solicitar para ser colocado en una lista de direcciones para futuros avisos por ponerse en contacto con Leonard Lowe en el Nuevo México OCD en 1220 Sur San. Francis Drive, Santa Fe, Nuevo México 87505, Teléfono (505) 476-3492. El OCD aceptará comentarios y declaraciones del interés en cuanto a la renovación y creará una lista de direcciones específica de instalación para personas que desean recibir futuros avisos.

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**Lowe, Leonard, EMNRD**

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**From:** Price, Wayne, EMNRD  
**Sent:** Thursday, June 19, 2008 12:32 PM  
**To:** Lowe, Leonard, EMNRD  
**Subject:** FW: Discharge Plan Revision

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**From:** Price, Wayne, EMNRD  
**Sent:** Thursday, June 12, 2008 7:55 AM  
**To:** 'Bays, David'  
**Cc:** Deklau, Ingrid; Tobia, Adam; Harkins, Carol  
**Subject:** RE: Discharge Plan Revision

Approved!

---

**From:** Bays, David [mailto:David.Bays@Williams.com]  
**Sent:** Wednesday, June 11, 2008 6:53 PM  
**To:** Price, Wayne, EMNRD  
**Cc:** Deklau, Ingrid; Tobia, Adam; Harkins, Carol  
**Subject:** Discharge Plan Revision

Wayne, I sent this to you in Leonard's absence. We need to install a double wall, double bottom waste water tank at the Milagro Gas Plant north of Bloomfield. Can you review the proposed modification and let me know if anything more is needed? Thanks.

David Bays, REM  
Sr. Environmental Specialist  
Williams Midstream  
Phone: (505) 634-4951  
Fax: (505) 632-4781

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This inbound email has been scanned by the MessageLabs Email Security System.

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7/7/2008



Environmental Department  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4606  
505/632-4781 Fax

June 10, 2008

Mr. Wayne Price  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Re: Williams Four Corners, LLC Milagro Plant (GW-60) – Minor Modification

Dear Mr. Price,

In accordance with Conditions of Discharge Plan Approval attached to each discharge plan approved by the New Mexico Oil Conservation Division, we hereby provide notice of the planned installation of a 120-bbl below-grade produced water tank at Williams Four Corners, LLC Milagro Plant (GW-060). As the installation of this tank is not associated with a facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants, Williams believes that this does not qualify as a significant modification to the existing Discharge Plan and that public notice is not required. The facility does not discharge wastewater to surface or subsurface waters. All non-aqueous wastes generated at the facility are temporarily stored in tanks or containers. Waste water is collected in three above ground 211,000 gallon evaporation ponds, as identified in the approved Discharge Plan.

Attached to this letter is a diagram of the 120 bbl tank, as well as a facility plot plan showing the location of the tank. The tank is double-walled and has a port to monitor the interstitial space for leak detection. A monthly inspection of the interstitial space will be performed to determine if the primary containment is leaking.

Also attached to this letter is an updated copy of Table 1, *Transfer, Storage and Disposal of Process Fluids, Effluent, and Waste Solids*, and Table 2, *Source, Quantity, and Quality of Effluent and Waste Solids* for the facility.

If you have any questions, please call me at (505) 632-4951.

Sincerely,

A handwritten signature in cursive script that reads "David Bays".

David Bays  
Senior Environmental Specialist

Attachments

xc: WFS FCA file 120

**Table 1**  
**Transfer, Storage and Disposal of Process Fluids, Effluent and Waste Solids**

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Laboratory Waste	Drum or other container	Varies	Berms	Non-exempt	Transported for disposal at disposal facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Used Oil, Glycol, Ambitol, and Water Mixture (Slop Oil)	Above Ground Storage Tank	2 @ 250 bbl	Berm	Non-exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Evaporation Basins	Open basin	3 @ 211,000 gal	Lined basin with secondary containment	Exempt	Evaporation is performed at this WFS facility or transported for disposal at disposal facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Condensate	Above Ground Storage Tank	100 bbl	Dirt berm with liner and gravel	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Produced Water	Below Grade Storage Tank	120 bbl	Double-walled tank	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Used Oil	Above Ground Storage Tank	1000 gal; 100 bbl	Berm	Non-exempt	May be hauled to WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters and Oil Soaked Pads and Socks	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Used oil filters and oil soaked pads and socks will be recycled as required by OCD regulations.
Used Process Filters	Drum or other container	Varies	Transported in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. Recycling options may be considered when available.
Spill Residue (e.g., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non-exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.

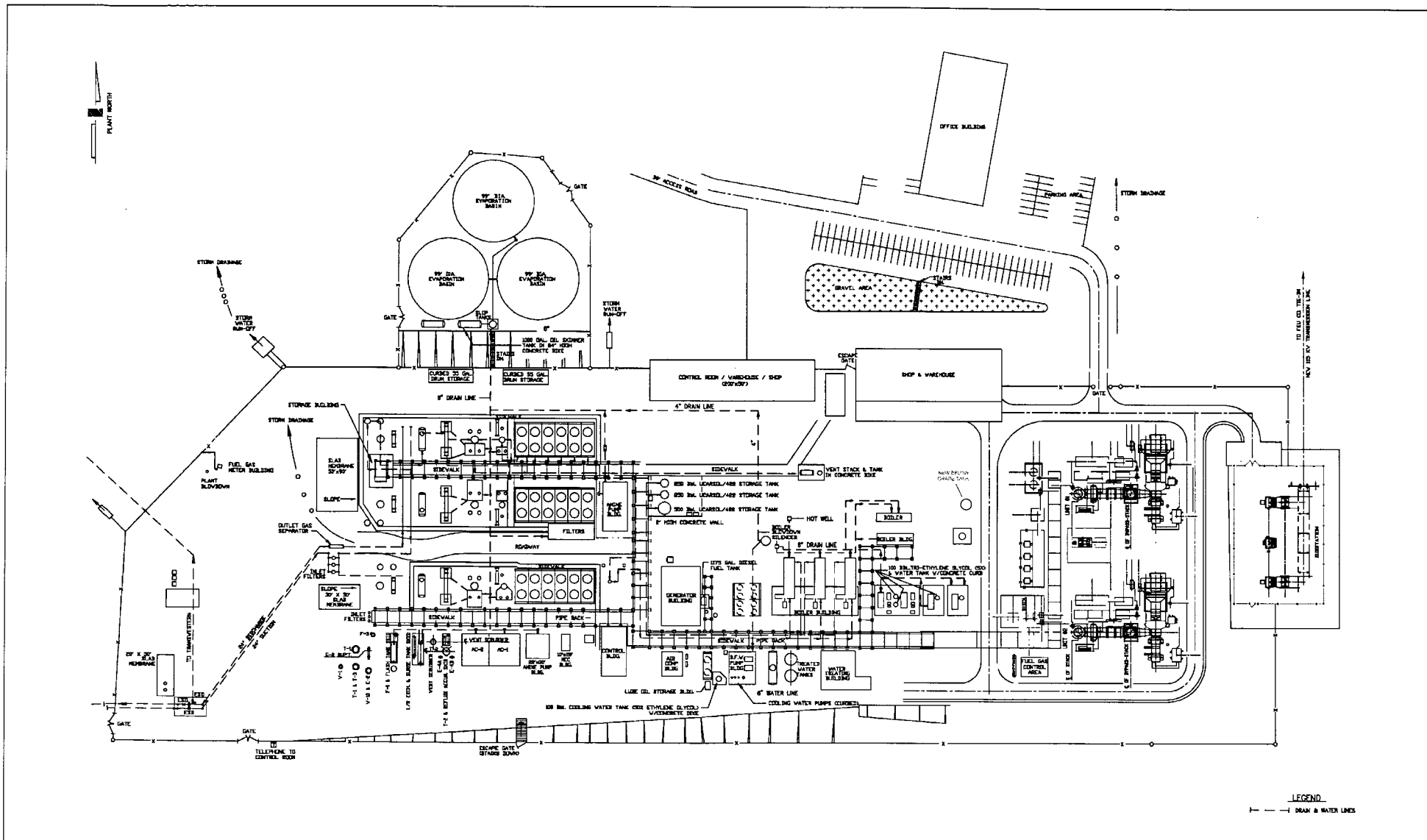
**Table 1 (continued)**  
**Transfer, Storage and Disposal of Process Fluids, Effluent and Waste Solids**

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Treated Water Storage Tank	Above Ground Storage Tank	2 @ 500 bbl	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
DI Water Storage Tank	Above Ground Storage Tank	500 bbl	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Steamate Storage Tank	Above Ground Storage Tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Control Storage Tank	Above Ground Storage Tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Polymer Storage Tank	Above Ground Storage Tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Amine Storage Tank	Above Ground Storage Tank	10,500 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Amine Mix Storage Tank (50-50 mix with deionized water)	Above Ground Storage Tank	500 bbl; 250 bbl; 100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol Mix Storage Tank (50-50 mix with deionized water)	Above Ground Storage Tank	100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
TEG Storage Tank	Above Ground Storage Tank	100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
TEG Mix Storage Tanks (50-50 mix with deionized water)	Above Ground Storage Tank	2 @ 100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Petroleum Solvent	Above Ground Storage Tank	300 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Dielectric Oil	Transformers	2 @ 4233 gal; 2 @ 456 gal; 4 @ 233 gal	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Gasoline	Above Ground Storage Tank	500 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel Fuel	Above Ground Storage Tank	1175 gal; 500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel Fuel	Above Ground Storage Tank	1250 gal	Inside semi trailer with earthen containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Turbine Lube Oil	Above Ground Storage Tank	2 @ 2300 gal	Inside building with concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Oil Skimmer Tank	Above Ground Storage Tank	1000 gal	Concrete containment	N/A	Separation system. Oil phase goes to slop oil tank; water phase goes to evaporation pond.

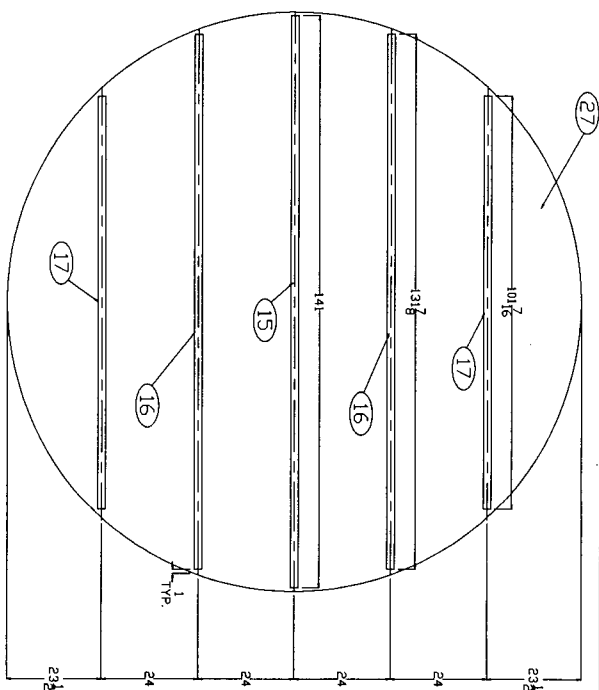
**Table 2**  
**Source, Quantity, and Quality of Effluent and Waste Solids**

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Produced Water/Natural Gas Condensate	Inlet Scrubber, Gas Inlet Separator, Dehydrators	2000-8000 bbl/year	No Additives
Waste Water /Wash Down Water	Produced Water, Boiler Blowdown; Sulfinol Pump Building; Sulfinol Reclaimer; Selected process containment drains; Compressor and Dehy Skids	1000-4000 gal/day	Water, Amine, Amine Salts, Glycol and Storm Water ; Biodegradable soap and tap water with traces of used oil
Used Oil, Glycol, Amine, Ambitrol, and Water Mixture	Filter Drain Pad	1-10 bbl/month	Used Motor Oil; Glycol; Amine; and Ambitrol with no additives
Used Glycol	Site and Field Dehydration	1000-4000 bbl/yr	No additives
Used Solvent and Water Treatment Chemicals	Parts Cleaner; Water Treatment	0-500 gal/year	No additives
Used Oil	Compressors, Turbines, Oil Skimmer	10-50 bbl/month	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors, Turbines	50-500/year/unit	No Additives
Lab Waste	Onsite testing glycol, amine, etc.	0-1200 gal/yr	No additives
Used Process Filters	Charcoal, Activated Carbon, Molecular Sieve	50-500 cubic yd/yr	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol	75-500/year	No Additives
Empty Drums/Containers	Liquid Containers	0-400/year	No Additives
Spill Residue ( i.e. soil, gravel, etc)	Incidental Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incidental Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives






<div> <div>LEGEND</div> <div>REFERENCE DRAWINGS</div> <div>REVISIONS</div> </div>										<div> <div>DRAFTING BY DATE</div> <div>BRUNN FALL 9-26-95</div> <div>CHENOS</div> <div>APPROVED</div> <div>ENGINEERING BY DATE</div> <div>WILL APPROVED</div> </div>			<div> <div>PRELIMINARY</div> <div>WILLIAMS FIELD SERVICE</div> <div>ONE OF THE WILLIAMS COMPANIES</div> <div>MILAGRO GAS CONDITIONING PLANT</div> <div>UNDERGROUND WASTE WATER LOCATION MAP</div> <div>PLOT PLAN</div> </div>			<div> <div>SCALE: 1" = 50'</div> <div>U.S. INCHES</div> </div>		<div> <div>DWG. NO.</div> <div>MLG-1-P225</div> </div>		<div>REV.</div> <div>02</div>
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ITEM		QTY.	PART #	DESCRIPTION	GRADE
1	1	X		ROLLED RING 3/16" X 6" X 12'-0" OD	X
2	2	X		FLAT BAR 1/2" X 4" X 12'-0" OD	X
3	2	X		ICE-CLIPPING 3/8" PLATE 4" X 6"	X
4	1	X		NAME PLATE BRACKET	X
5	1	X		TANK MODEL NUMBER NAME PLATE	X
6	5-3	X		PRE-USED 3/1-1/2" OD X 216" WALL THK	X
7	2	X		FLAT BAR 1/2" X 4" X 12'-0" OD	X
8	2	X		ROLLED ANGLE 2" X 2" X 1/4"	X
9	9	X		ANGLE 2" X 2" X 1/4"	X
10	1	X		ROUND 1/2" HOT ROLLED 10" X 12'-0" OD	X
11	1	X		ANGLE 4" WITH 1/2" PIN	X
12	4	X		SHIELD 1/2" X 2" X 2"	X
13	1	X		SHEET 1/2" X 2" X 2"	X
14	1	X		VENT 12" DIA.	X
15	1	X		CHANNEL 3" X 4" X 1/4" LG	X
16	2	X		CHANNEL 3" X 4" X 1/4" LG	X
17	2	X		CHANNEL 3" X 4" X 1/4" LG	X
18	2	X		CHANNEL 3" X 4" X 1/4" LG	X
19	2	X		BELLOW-WELD 1-1/2" STD LR 90°	X
20	2	X		PRE-1 1/2" X SCH 80 (2007) X 126'-1/4" LG	X
21	1	X		PRE-1 1/2" X SCH 80 (2007) X 5'-1/2" LG	X
22	1	X		BELLOW-WELD 2" STD LR 90° 10' LG	X
23	1	X		FLAT BAR 1/2" X 4" X 12'-0" OD	X
24	1	X		COR-THICKEND 2" 150# WALL	X
25	1	X		ROLLED RING 3/16" X 6" X 12'-0" OD	X
26	1	X		BOTTOM TANK 1/4" X 11'-10" OD	X
27	1	X			X

## GENERAL NOTES

CUSTOMER		BENCHMARK EQUIPMENT & TANK	
326 N. BERGIN LANE		BLOOMFIELD, N.M. 87413	
(505)-632-9030			
			
<p>ALL INFORMATION CONTAINED IN THIS DRAWING, WHETHER OR NOT IT IS INDICATED OTHERWISE, IS THE SOLE PROPERTY OF BENCHMARK EQUIPMENT &amp; TANK. IT IS TO BE USED ONLY FOR THE PRODUCTION OF EQUIPMENT. REPRODUCTION OR ANY OTHER USE WITHOUT THE EXPRESSED WRITTEN CONSENT OF B.E.T. INC. IS PROHIBITED.</p>			
DWG. NO.	CHK	BY	DATE
4236		ENG.	03-19-08
TITLE:		DRAWING	
120 BR. 4" OD		REV: 0	
DOUBLE WALL AND BOTTOM		SCALE:	
WITH CONE TOP		X=12"	
BET PART #		PAGE:	
#		X OF X	



Environmental Affairs  
188 CR 4900  
Bloomfield, NM 87413  
505/632-4606  
505/632-4781 Fax

March 17, 2006

Mr. Jack Ford  
New Mexico Oil Conservation Division  
Water Quality Management Fund  
2040 South Pacheco  
Santa Fe NM 87505

**Re: Discharge Plan GW-060, -061, -233, -327, -328, -330 and -331**

Dear Mr. Ford:

Enclosed please find the signed copy of the discharge plan conditions for the following Williams Field Services (WFS) sites:

- Milagro Plant (GW-60)
- Horse Canyon CS (GW-61)
- La Jara CS (GW-233)
- Blanco CS (GW-327)
- Thompson CS (GW-328)
- Dogie CS (GW-330)
- Chaco CS (GW-331)

Also included is check 4027012911 for \$14,200.00 to cover the flat fee required by the approval conditions for all sites.

Williams Field Services appreciates your assistance in handling these approvals and processing the fees. If you have any questions or require additional information, please contact me at 505/632/4606.

Thank you,

A handwritten signature in cursive script, appearing to read "Clara M. Cardoza".

Clara M. Cardoza  
Environmental Compliance

enclosures

Description		FUND	CES	DFA ORG	ACCT	ORG	ACCT	AMOUNT	
1	CY Reimbursement Project	064	01		2329	900000	2329134		1
5	Gross Receipt Tax	084	01						2
3	Air Quality Title V	092	13	1300	1896	900000	4169134		3
4	PRP Prepayments	248	14	1400	9896	900000	4989014		4
2	Climax Chemical Co.	248	14	1400	9896	900000	4989016		5
6	Circle K Reimbursements	248	14	1400	9896	900000	4989248		6
7	Hazardous Waste Permits	339	27	2700	1896	900000	4169027		7
8	Hazardous Waste Annual Generator Fees	339	27	2700	1896	900000	4169338		8
10	Water Quality - Oil Conservation Division	341	29		2329	900000	2329029	\$14200.00	10
11	Water Quality - GW Discharge Permit	341	29	2900	1896	900000	4169029		11
12	Air Quality Permits	831	31	2500	1896	900000	4169031		12
13	Payments under Protest	851	33		2919	900000	2919033		13
14	Xerox Copies	862	34		2349	900000	2349001		14
15	Ground Water Penalties	862	34		2349	900000	2349002		15
16	Witness Fees	862	34		2349	900000	2439003		16
17	Air Quality Penalties	862	34		2349	900000	2349004		17
18	OSHA Penalties	862	34		2349	900000	2349006		18
19	Prior Year Reimbursement	862	34		2349	900000	2349009		19
20	Surface Water Quality Certification	862	34		2349	900000	2349012		20
21	Jury Duty	862	34		2349	900000	2349014		21
22	CY Reimbursements (i.e. telephone)	783	24	2500	9896	900000	4989201		22
23	UST Owner's List	783	24	2500	9896	900000	4989202		23
24	Hazardous Waste Notifiers List	783	24	2500	9896	900000	4989203		24
25	UST Maps	783	24	2500	9896	900000	4989206		25
26	UST Owner's Update	783	24	2500	9896	900000	4989207		26
28	Hazardous Waste Regulations	783	24	2500	9896	900000	4989208		28
29	Radiologic Tech. Regulations	783	24	2500	9896	900000	4989211		29
30	Superfund CERLIS List	783	24	2500	9896	900000	4989213		30
31	Solid Waste Permit Fees	783	24	2500	9896	900000	4989214		31
32	Smoking School	783	24	2500	9896	900000	4989222		32
33	SWQB - NPS Publications	783	24	2500	9896	900000	4989228		33
34	Radiation Licensing Regulation	783	24	2500	9896	900000	4989301		34
35	Sale of Equipment	783	24	2500	9896	900000	4989302		35
36	Sale of Automobile	783	24	2500	9896	900000	4989814		36
37	Lust Recoveries	783	24	2500	9896	900000	4989815		37
38	Lust Repayments	783	24	2500	9896	900000	4989801		38
39	Surface Water Publication	783	24	2500	9896	900000	4989242		39
40	Exxon Road Drive Ruidoso - CAF	783	24	2500	9896	900000	4164032		40
41	Emerg. Hazardous Waste Penalties NOV	957	32	9600	1896	900000	4169006		41
42	Radiologic Tech. Certification	988	05	0500	1896	900000	4169020		42
43	Ust Permit Fees	989	20	3100	1896	900000	4169021		43
14	UST Tank Installers Fees	989	20	3100	1896	900000	4169026		14
15	Food Permit Fees	991	28	2800	1896	900000			15
13	Other								13

Gross Receipt Tax Required

Site Name & Project Code Required

TOTAL \$14200.00

Contact Person: Erl Martinez

Phone: 476-3492

Date: 3/21/06

Received in ASD By: \_\_\_\_\_

Date: \_\_\_\_\_ RT #: \_\_\_\_\_

ST #: \_\_\_\_\_

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 3/14/06  
or cash received on \_\_\_\_\_ in the amount of \$ 4,000.00  
from Williams Field Services Co.  
for Milagro Plant GW-60  
Submitted by: Lawrence Romero (Facility Name) Date: 3/21/06 (DP No.)  
Submitted to ASD by: Lawrence Romero Date: 3/21/06  
Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_  
Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal ☒  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment \_\_\_\_\_

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. IT ALSO HAS A REFLECTIVE WATERMARK ON THE BACK.

**Williams**  
WILLIAMS FIELD SERVICES COMPANY  
PO Box 21218  
Tulsa, OK 74121-1218  
Customer Support 1-866-778-2665

JPMorgan Chase Bank, N.A.  
Chicago, IL

70-2322 / 719  
A/C 9401167  
[REDACTED]  
DATE: 03/14/2006

PAY TO THE ORDER OF: WATER MANAGEMENT QUALITY MANAGEMENT FUND  
C/O OIL CONSERVATION DIV  
1220 S ST FRANCIS DR

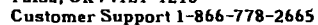
PAY \$\*\*\*\*\*14,200.00  
USD

SANTA FE UNITED STATES NM 87505

SUPPLIER NUMBER 400443

GW-60 BW-61 GW-233 GW-327 GW-328 GW-330 GW-331

*Matthew Hill*  
Authorized Signer



INVOICE NUMBER	INV. DATE	INVOICE DESCRIPTION	NET AMOUNT
13-MAR-2006	20060313	PERMIT RENEWAL	14,200.00



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

December 19, 2005

**Mark E. Fesmire, P.E.**

Director

**Oil Conservation Division**

Ms. Clara Cardoza  
Williams Field Services, Inc.  
188 CR 4900  
Bloomfield, New Mexico 87413

**RE: Discharge Permit Renewal GW-060  
Williams Field Services, Inc.  
Milagro Plant  
San Juan County, New Mexico**

Dear Ms. Cardoza:

The ground water discharge permit renewal application GW-060 for the Williams Field Services, Inc. Milagro Plant located in the W/2 SE/4 of Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge permit application was submitted on December 3, 1990 and approved March 21, 1991. The discharge permit renewal application, dated November 30, 2005, submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge permit is renewed pursuant to 20 NMAC 3106.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provides for possible future amendment or modifications of the permit. Please be advised that approval of this permit does not relieve Williams Field Services, Inc. of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that 20 NMAC 3104 of the regulations provides: "When a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to 20 NMAC 3107.C., Williams Field Services, Inc. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

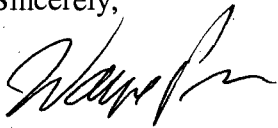
Ms. Clara Cardoza  
GW-060 Milagro Plant  
December 19, 2005  
Page 2

Pursuant to 20 NMAC 3109.G.4., this renewal permit is for a period of five years. This renewal will expire on **March 31, 2011**, and Williams Field Services, Inc. should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge permit facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge permit.

The discharge permit renewal application for the Williams Field Services, Inc. Milagro Plant is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a fee equal to the filing fee of \$100.00. There is a renewal flat fee assessed for gas processing plant facilities equal to \$4,000.00. The OCD has not received the filing fee.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,



Wayne Price  
Chief, Environmental Bureau  
Oil Conservation Division

WP/wjf  
Attachment

xc: OCD Aztec Office



ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-060  
WILLIAMS FIELD SERVICES, INC.  
MILAGRO PLANT  
DISCHARGE PERMIT APPROVAL CONDITIONS  
(December 19, 2005)

1. Payment of Discharge Permit Fees: The \$100.00 filing fee has not been received by the OCD. There is a required flat fee equal to \$4,000.00 for gas processing plant facilities. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated November 30, 2005 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Permit: Williams Field Services shall maintain storm water runoff controls. As a result of Williams Field Services's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Milagro Plant are discontinued for a period in excess of six months. Prior to closure of the Milagro Plant a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by \_\_\_\_\_

\_\_\_\_\_  
Title

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-060  
WILLIAMS FIELD SERVICES, INC.  
MILAGRO PLANT  
DISCHARGE PERMIT APPROVAL CONDITIONS  
(December 19, 2005)

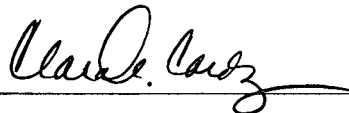
1. Payment of Discharge Permit Fees: The \$100.00 filing fee has not been received by the OCD. There is a required flat fee equal to \$4,000.00 for gas processing plant facilities. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated November 30, 2005 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Permit: Williams Field Services shall maintain storm water runoff controls. As a result of Williams Field Services's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Milagro Plant are discontinued for a period in excess of six months. Prior to closure of the Milagro Plant a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by   
Environmental Compliance  
Title



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Betty Rivera

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

March 7, 2002

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 3929 7570**

Mr. Mark J. Bareta  
Williams Field Services  
188 CR 4900  
Bloomfield, New Mexico 87413

**RE: Site Modification Notification  
GW-060, Milagro Gas Plant  
San Juan County, New Mexico**

Dear Mr. Bareta:

The OCD has received the site modification letter, dated February 27, 2002, from Williams Field Services for the Milagro Gas Plant GW-060 located in SW/4 SE/4 of Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. **The site modification is approved without modification to the discharge plan with the stipulation that all modifications comply with the discharge plan approved July 3, 2001.**

Please note that Section 3104 of the regulations requires that **"When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."** Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. Further, this approval does not relieve Williams Field Services from liability should operations result in contamination to the environment.

Sincerely,

Roger C. Anderson  
Environmental Bureau  
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

U.S. Postal Service  
CERTIFIED MAIL RECEIPT  
(Domestic Mail Only. No Insurance Coverage Provided)

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

7001 1940 0004 3929 7570

**SANTA FE NM**  
**MAR 07 2002**

87505

**Sent To**  
Street, Apt. No.,  
or PO Box No.  
City, State, ZIP+4

WFS  
GW-060

PS Form 3800, January 2001 See Reverse for Instructions

ATTACHMENT TO THE DISCHARGE PLAN GW-060  
WILLIAMS FIELD SERVICES  
MILAGRO GAS PLANT  
DISCHARGE PLAN APPROVAL CONDITIONS  
(July 3, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas processing plants equal to \$4,000.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan renewal application dated April 26, 2001 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.



8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the Milagro Gas Plant are discontinued for a period in excess of six months. Prior to closure of the Milagro Gas Plant a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted: *July 26, 2001*

WILLIAMS FIELD SERVICES

by *Clara M. Pareia*  
Title *Environmental Compliance*



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
**Oil Conservation Division**

July 3, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 0630**

Ms. Clara L Garcia  
Williams Field Services  
188 CR 4900  
Bloomfield, New Mexico 87413

**RE: Discharge Plan Renewal Approval GW-060**  
**Williams Field Services**  
**Milagro Gas Plant**  
**San Juan County, New Mexico**

Dear Ms. Garcia:

The ground water discharge plan renewal GW-060 for the Williams Field Services Milagro Gas Plant located in the SW/4 SE/4 of Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge plan application was submitted on December 3, 1990 pursuant to Section 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan renewal application was submitted April 26, 2001 pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **March 31, 2006**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

Williams Field Services will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the Milagro Gas Plant.

Ms. Clara L. Garcia  
GW-060 Milagro Gas Plant  
July 3, 2001  
Page 2

The discharge plan application for the Williams Field Services Milagro Gas Plant is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for natural gas processing plants equal to \$4,000.00. The OCD has received the filing fee.

**Please make all checks payable to: Water Management Quality Management Fund  
C/o: Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505.**

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf  
Attachment

xc: OCD Aztec Office

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Name (Please Print Clearly) (To be completed by mailer) *C. Garcia*

Street, Apt. No.; or PO Box No. *WFS*

City, State, ZIP+ 4 *GW-060*

PS Form 3800 July 1999 See Reverse for Instructions

7099 3220 0000 5051 0630

ATTACHMENT TO THE DISCHARGE PLAN GW-060  
WILLIAMS FIELD SERVICES  
MILAGRO GAS PLANT  
DISCHARGE PLAN APPROVAL CONDITIONS  
(July 3, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas processing plants equal to \$4,000.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
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17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by \_\_\_\_\_  
Title

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 4/5/01  
or cash received on \_\_\_\_\_ in the amount of \$ 500.00  
from Williams Field Services  
for Manzaneros C.S. - GW-062 Milagro G.P. GW-060 5. Pintos C.S. - GW-078  
Cedar Hill GS - GW-087 29-G\*3 CS-GW-198  
(Family Name)  
Submitted by: [Signature] Date: 5/1/01 (DP No.)  
Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_  
Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_  
Filing Fee ☒ New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_ (specify)  
Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment \_\_\_\_\_

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. IT ALSO HAS A REFLECTIVE WATERMARK ON THE BACK.

**Williams**  
WILLIAMS FIELD SERVICES COMPANY  
1800 South Baltimore Avenue \* P.O. Box 645 \* Tulsa, OK 74101-0645  
70-2322 / 719  
A/C 9401076

PAY TO THE ORDER OF:

NEW MEXICO OIL CONSERVATION DI  
NM WATER QUALITY MGMT FUND  
2040 S PACHECO

SANTA FE  
United States  
Bank One, NA  
Illinois

NM 87504

PAY → \*\*\*\*\*\$500.00

DATE: 04/05/2001

[Signature]  
Authorized Signer





Environmental Affairs  
188 CR 4900  
Bloomfield, NM 87413  
505/634-4956  
505/632-4781 Fax

April 26, 2001

APR 30 2001

Mr. Jack Ford  
New Mexico Oil Conservation Division  
2040 South Pacheco  
Santa Fe NM 87505

**Re: Discharge Plan Application and Filing Fee for WFS Compressor Stations**

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application and check number 1000267866 for \$500.00 to cover the filling fee for the following Williams Field Services (WFS) Compressor Stations:

- Manzanares CDP Compressor Station - GW-262
- Milagro Plant - GW-060
- 5-Points Compressor Station - GW-078
- Cedar Hill CDP - GW-087
- 29-6#3 CDP Compressor Station - GW-178

Also, we would like this to serve as a notice that the compression, dehydration and storage tanks at the Hart Mountain and Trunk G sites have been removed. Therefore, GW208 and GW229, respectively, will not need to be renewed. Although equipment has been removed from service, the site is part of the pipeline right-of-way and is still in use. Upon site closure, the closure plan will be implemented.

Williams Field Services appreciates your assistance in handling this application. If you have any questions or require additional information, please contact me at 505/634/4956.

Thank you,

Clara M Garcia  
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

May 1, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5050 9535**

Ms. Ingrid A. Deklau  
Williams Field Services  
P.O. Box 58900  
Salt Lake City, Utah 84108

**RE: Site Modifications Notification  
GW-060, Milagro Gas Plant  
San Juan County, New Mexico**

Dear Ms. Deklau:

The OCD has received the site modification letter, dated April 18, 2000, from Williams Field Services for the Milagro Gas Plant GW-060 located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The requested conversion of the current additive tank to additional capacity for amine/water mix, and installing a new CS Plus solvent tank within the existing concrete berm is considered a minor modification to the above referenced discharge plan and public notice will not be issued. **This minor modification to the discharge plan is approved.**

Please note that Section 3104 of the regulations requires that **"When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."** Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. Further, this approval does not relieve Williams Field Services from liability should operations result in contamination to the environment.

Sincerely,

Roger C. Anderson  
Bureau Chief, Environmental Bureau  
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

## NOTICE OF PUBLICATION

### STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

**(GW-060) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Milagro Gas Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 gallons per day of process wastewater will be disposed of in open top evaporation tanks with a synthetic impervious liner and leak detection system. Groundwater most likely to be affected by an accidental discharge is at a depth of 40 feet with a total dissolved solids concentrations of 5800 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-062) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Manzanares CDP compressor station located in the SE/4 SW/4, Section 28, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of wastewater with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, bermed closed-top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 115 feet with a total dissolved solids concentrations of approximately 910 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-087) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Cedar Hill CDP compressor station located in the SW/4 SW/4, Section 28, Township 32 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of wastewater with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, bermed closed-top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 160 feet with a total dissolved solids concentrations ranging from 200 to 600 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

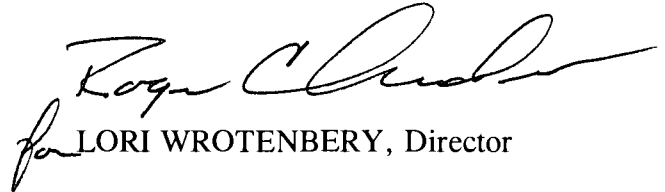
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held.

A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 1st day of May, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
for LORI WROTENBERY, Director

SEAL



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87506  
(505) 927-7131

June 25, 1999

Z 274 520 512

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>Ingrid</i>	
Street & Number <i>WFS</i>	
Post Office, State, & ZIP Code <i>SLC</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>GW-060</i>	

PS Form 3800 April 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-274-520-512**

Ms. Ingrid A. Deklau  
Williams Field Services  
P.O. Box 58900  
Salt Lake City, Utah 84108

**RE: Site Modifications Notification**  
**GW-060, Milagro Gas Plant**  
**San Juan County, New Mexico**

Dear Ms. Deklau:

The OCD has received the site modification letter, dated June 15, 1999, from Williams Field Services for the Milagro Gas Plant facility GW-060 located in SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The requested modification is considered a minor modification to the above referenced discharge plan and public notice will not be issued. **The site modifications are approved without modification to the discharge plan with the stipulation that the attached conditions become a part of the discharge plan renewal approved August 13, 1996.**

Please note that Section 3104 of the regulations requires that **"When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."** Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. Further, this approval does not relieve Williams Field Services from liability should operations result in contamination to the environment.

Sincerely,

Roger C. Anderson.  
Chief, Environmental Bureau  
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

**ATTACHMENT TO SITE MODIFICATION  
WILLIAMS FIELD SERVICES  
GW-060 MILAGRO GAS PLANT FACILITY  
San Juan County, New Mexico  
(June 25, 1999)**

**LANDFARM CONSTRUCTION**

1. The landfarm facility must commence construction within 1 year of the modification approval date.
2. The landfarm facility must be fenced and have a sign at the entrance. The sign must be legible from at least fifty (50) feet and contain the following information: a) name of the facility; b) location by section, township and range; and c) emergency phone number.
3. Contaminated soils may not be placed within one hundred (100) feet of the neighboring property boundary or within twenty-five (25) feet of the facility boundary.
4. Contaminated soils may not be placed within twenty (20) feet of any pipeline or well pad and equipment including existing or former pit locations. In addition, no equipment may be operated within ten (10) feet of a pipeline. All pipelines crossing the facility must have surface markers identifying the location of the pipelines.
5. The portion of the facility containing contaminated soils must be bermed to prevent runoff and runoff. A perimeter berm and individual cell berms no less than one and a half (1½) feet above grade must be constructed and maintained such that they are capable of containing precipitation from a one-hundred year flood for the specific region.

**LANDFARM OPERATION**

1. Disposal may occur only when an attendant is on duty. The facility must be secured when no attendant is present.
2. All contaminated soils received at the facility must be spread and disked within 72 hours of receipt.
3. Soils must be spread on the surface in twelve (12) inch lifts or less.
4. Soils must be disked a minimum of one time every two weeks (bimonthly) to enhance biodegradation of contaminants.

5. Exempt contaminated soils must be placed in the landfarm so that they are physically separate (*i.e.*, bermed) from non-exempt contaminated soils. There may be no mixing of exempt and non-exempt soils.
6. Successive lifts of contaminated soils may not be spread until a laboratory measurement of total petroleum hydrocarbons (TPH) in the previous lift is less than 100 parts per million (ppm), the sum of all aromatic hydrocarbons (BTEX) is less than 50 ppm, and benzene is less than 10 ppm. Comprehensive records of the laboratory analyses and the sampling locations must be maintained at the facility. Authorization from the OCD must be obtained prior to application of successive lifts and/or removal of the remediated soils.
7. Moisture must be added as necessary to enhance bioremediation and to control blowing dust. There may be no ponding, pooling or run-off of water allowed. Any ponding of precipitation must be removed within twenty-four (24) hours of discovery.
8. Enhanced bio-remediation through the application of microbes (bugs) and/or fertilizers may only be permitted after prior approval from the OCD. Requests for application of microbes or fertilizers must include the location of the area designated for the program, the composition of additives, and the method, amount and frequency of application.
9. Landfarm inspection and maintenance must be conducted on a weekly basis or immediately following a consequential rainstorm or windstorm.

#### **TREATMENT ZONE MONITORING**

1. One (1) background soil sample must be taken from the center portion of the landfarm two (2) feet below the native ground surface prior to operation. The sample must be analyzed for total petroleum hydrocarbons (TPH), major cations/anions, volatile aromatic organics (BTEX), and eight (8) RCRA heavy metals using EPA-approved methods.
2. A treatment zone not to exceed three (3) feet beneath the landfarm native ground surface must be monitored. A minimum of one random soil sample must be taken from each individual cell, with no cell being larger than five (5) acres, six (6) months after the first contaminated soils are received in the cell and then annually thereafter. The sample must be taken at two (2) to three (3) feet below the native ground surface.

3. The soil samples must be analyzed using EPA-approved methods for total petroleum hydrocarbons (TPH) and volatile aromatic organics (BTEX) quarterly and for major cations/anions and eight (8) RCRA heavy metals annually.
4. After obtaining the soil samples the boreholes must be filled with an impermeable material such as cement or bentonite.

### WASTE ACCEPTANCE CRITERIA

1. The facility is authorized to accept only exempt and "non-hazardous" non-exempt oilfield wastes that are generated in the State of New Mexico by Williams Field Services, Inc.
2. The facility is authorized to accept only:
  - a. Oilfield wastes that are exempt from RCRA Subtitle C regulations and that does not contain Naturally Occurring Radioactive Material (NORM) regulated pursuant to 20 NMAC 3.1 Subpart 1403.
  - b. "Non-hazardous" non-exempt oilfield wastes on a case-by-case basis after conducting a hazardous waste characterization including corrosivity, reactivity, ignitability, and toxic constituents. The samples for these analyses must be obtained from the wastes prior to removal from the point of origin and without dilution in accordance with EPA SW-846 sampling procedures. The test for hazardous characteristics for a particular waste may be effective for an extended period of time from the date of analysis based on process knowledge and if approved by the OCD. In addition the generator must certify that this waste does not contain Naturally Occurring Radioactive Material (NORM) regulated pursuant to 20 NMAC 3.1 Subpart 1403.
3. At no time may any OCD-permitted surface waste management facility accept wastes that are hazardous by either listing or characteristic testing
4. No free liquids or soils with free liquids may be accepted at the facility.
5. The transporter of any wastes to the facility must supply a certification that wastes delivered are those wastes received from the generator and that no additional materials have been added.



6. Comprehensive records of all material disposed of at the surface waste management facility must be maintained by the permit holder.

#### **REPORTING AND RECORD KEEPING**

1. Analytical results from the treatment zone monitoring including a sample location map will be submitted to the OCD Santa Fe office **six months after initial construction and annually thereafter.**
2. Background sample analytical results must be submitted to the OCD Santa Fe office **within thirty (30) days** of receipt from the laboratory.
3. The applicant must notify the **OCD Aztec District office with in 24 hours** of any fire, break, leak, spill, blowout or any other circumstance that could constitute a hazard or contamination in accordance with OCD Rule 116.
4. All records of testing and monitoring must be retained for a period of five (5) years.
5. The OCD must be notified prior to the installation of any pipelines or wells or other construction within the boundaries of the facility.

#### **FINANCIAL ASSURANCE**

1. Pursuant to OCD Rule 711.A.3., the Milagro Gas Plant landfarm facility is exempt from permitting financial assurance requirements. In the event the landfarm facility exceeds the provisions of OCD Rule 711.A.3.b, Williams Field Services will be required to be permitted under OCD Rule 711 and provide the required financial assurance determined for this facility.
2. The facility is subject to periodic inspections by the OCD. The conditions of this modification and the facility will be reviewed no later than five (5) years from the date of this approval.

## **CLOSURE**

1. The OCD Santa Fe and Aztec offices must be notified when operation of the facility is discontinued for a period in excess of six (6) months or when the facility is to be dismantled. Upon cessation of landfarming operations for six (6) consecutive months, the operator must complete cleanup of constructed facilities and restoration of the facility site within the following six (6) months, unless an extension of time is granted by the Director.
2. A closure plan to include the following procedures must be submitted to the OCD Santa Fe office for approval:
  - a. When the facility is to be closed no new material will be accepted.
  - b. Existing landfarm soils will be remediated until they meet the OCD standards in effect at the time of closure.
  - c. The soils beneath the landfarm cells will be characterized as to the total petroleum hydrocarbons (TPH) and volatile aromatic organics (BTEX) content in order to determine potential migration of contamination beneath the facility.
  - d. Contaminated soils exceeding OCD closure standards for the site will be removed or remediated.
  - e. The area will be contoured, seeded with native grasses and allowed to return to its natural state. If the landowner desires to keep existing structures, berms, or fences for future alternative uses the structures, berms, or fences may be left in place.
  - f. Closure will be pursuant to all OCD requirements in effect at the time of closure, and any other applicable local, state and/or federal regulations.

**WILLIAMS FIELD SERVICES**  
ONE OF THE WILLIAMS COMPANIES

P.O. Box 58900  
Salt Lake City, UT 84158-0900  
(801) 584-7033  
FAX: (801) 584-6483

August 26, 1996

SEP - 9 1996

CONSERVATION DIVISION

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87504

Re: Discharge Plans Fees - San Juan County  
Trunk A (GW-248)  
Trunk B (GW-249)  
Coyote Springs (GW-250)  
Milagro Plant (GW-60)

RECEIVED

SEP 09 1996

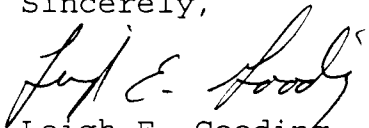
Environmental Bureau  
Conservation Division

Dear Mr. Anderson:

Enclosed, please find the signed Conditions of Approval and four (4) checks made payable to the WQCC to cover the discharge plan fees for the above referenced Williams Field Services Company facilities.

If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,



Leigh E. Gooding  
Sr. Environmental Specialist

enclosure

RECEIVED

SEP 09 1996

Environmental Bureau  
Oil Conservation Division

Ms. Leigh Gooding  
Williams Field Services  
GW-60 Modification  
Page 3  
August 13, 1996

**ATTACHMENT TO DISCHARGE PLAN GW-60**  
**Williams Field Services - Milagro Gas Plant**  
**DISCHARGE PLAN REQUIREMENTS**  
(August 13, 1996)

1. **Payment of Discharge Plan Fees:** The \$50 filing and \$1,667.50 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. **Williams Field Services Commitments:** Williams Field Services will abide by all commitments submitted by Williams Field Services as part of the approval from OCD dated January 18, 1996, the modification letter from Williams Field Services dated April 23, 1996, and this approval letter with conditions of approval from OCD dated August 13, 1996.
3. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.  
  
All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.
4. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
6. **Above Ground Saddle Tanks:** Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
7. **Tank Labeling:** All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
8. **Below Grade Tanks/Sumps:** All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

RECEIVED

SEP 09 1996

Ms. Leigh Gooding  
Williams Field Services  
GW-60 Modification  
Page 4  
August 13, 1996

Environmental Bureau  
Oil Conservation Division

9. **Underground Process/Wastewater Lines:** All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing so that an OCD representative may witness the testing.

10. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

11. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Aztec OCD District Office at (505)-334-6178.

12. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

13. **New Mexico Oil Conservation Division Inspections:** Additional requirements may be placed on the facility based upon results from New Mexico Oil Conservation Division inspections.

14. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

15. Conditions accepted by:

*Handwritten signature*

*Handwritten signature*

Company Representative

8-23-96

Date

*Handwritten signature*

Title



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

August 13, 1996

P 594 835 299

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-594-835-299**

Ms. Leigh E. Gooding  
Williams Field Services  
P.O. Box 58900, M.S. 2G1  
Salt Lake City, Utah 84158-0900

**RE: Discharge Plan Modification GW-60  
Milagro Gas Plant  
San Juan County, New Mexico**

Dear Ms. Gooding:

The discharge plan modification for the Williams Field Services Milagro Gas Plant GW-60 located in SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan modification consists of the approval from OCD dated January 18, 1996, the modification letter from Williams Field Services dated April 23, 1996, and this approval letter with conditions of approval from OCD dated August 13, 1996. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within five working days of receipt of this letter.

The discharge plan modification was submitted pursuant to Section 3107.C of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this modification does not relieve Williams Field Services of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

US Postal Service  
**Receipt for Certified Mail**  
No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

Sent to WFS - Ms Leigh Gooding	
Street & Number Milagro G.P. Mod.	
Post Office, State, & ZIP Code GW-60	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

Ms. Leigh Gooding  
Williams Field Services  
GW-60 Modification  
Page 2  
August 13, 1996

Please note that Section 3104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

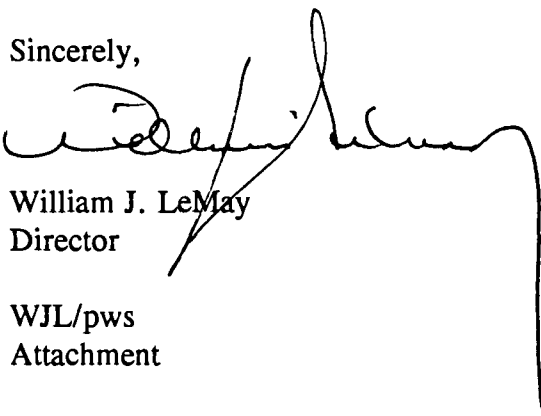
Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. **This approval will expire March 21, 2001, and an application for renewal should be submitted in ample time before that date.**

The discharge plan modification for the Williams Field Services Milagro Gas Plant GW-60 is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan modification will be assessed a fee equal to the filing fee of fifty dollars (\$50) plus the flat fee of one-thousand and six-hundred and sixty-seven dollars and fifty cents (\$1,667.50) for Gas Plants modifying existing discharge plans.

**The \$50 filing fee has not been received by the OCD. The flat fee for an approved discharge plan has not been received by the OCD.**

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



William J. LeMay  
Director

WJL/pws  
Attachment

xc: Mr. Denny Foust

Ms. Leigh Gooding  
Williams Field Services  
GW-60 Modification  
Page 3  
August 13, 1996

**ATTACHMENT TO DISCHARGE PLAN GW-60**  
**Williams Field Services - Milagro Gas Plant**  
**DISCHARGE PLAN REQUIREMENTS**  
(August 13, 1996)

1. **Payment of Discharge Plan Fees:** The \$50 filing and \$1,667.50 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. **Williams Field Services Commitments:** Williams Field Services will abide by all commitments submitted by Williams Field Services as part of the approval from OCD dated January 18, 1996, the modification letter from Williams Field Services dated April 23, 1996, and this approval letter with conditions of approval from OCD dated August 13, 1996.
3. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.  
  
All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.
4. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
6. **Above Ground Saddle Tanks:** Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
7. **Tank Labeling:** All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
8. **Below Grade Tanks/Sumps:** All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.



Ms. Leigh Gooding  
Williams Field Services  
GW-60 Modification  
Page 4  
August 13, 1996

9. **Underground Process/Wastewater Lines:** All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing so that an OCD representative may witness the testing.

10. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

11. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Aztec OCD District Office at (505)-334-6178.

12. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

13. **New Mexico Oil Conservation Division Inspections:** Additional requirements may be placed on the facility based upon results from New Mexico Oil Conservation Division inspections.

14. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

15. **Conditions accepted by:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 1/29/96  
or cash received on                      in the amount of \$ 1667.50  
from Williams Field Services  
for Milagra Plant GW-060  
(Facility Name) (DP No.)  
Submitted by:                      Date:                       
Submitted to ASD by: R. Anderson Date: 3/25/96  
Received in ASD by: Angela Herrera Date: 3-29-96  
Filing Fee        New Facility        Renewal X  
Modification        Other                       
(Specify)  
Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment       


**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES  
P. O. Box 58900  
Salt Lake City, Utah 84158-0900

Corestates Bank of Delaware, N.A.  
In cooperation with 1st Interstate Bank  
62-22  
311

DATE	CHECK NO.	NET AMOUNT
01/29/96	<u>                    </u>	1667.50

PAY  
ONE THOUSAND SIX HUNDRED SIXTY-SEVEN AND 50/100-----

TO THE  
ORDER  
OF  
NMED-WATER QUALITY MANAGEMENT  
P. O. BOX 26110  
SANTA FE NM 87505

Williams Field Services Company  
  
VICE PRESIDENT  
AUTHORIZED REPRESENTATIVE

Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT

*Mulgo*

801 584-7033

01/29/96

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
11896	DISCHARGE PLAN REN	01/18/96	1667.50	0.00	1667.50
		<del>RECEIVED</del>	<i>GW-60</i> <i>Re-survey</i>		
		<del>RECEIVED</del>			
		<del>RECEIVED</del>			
			1667.50	0.00	1667.50

PLEASE DETACH BEFORE DEPOSITING



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

January 18, 1996

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z-765-962-611**

Ms. Leigh Gooding  
Williams Field Services, Inc.  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900

**RE: Discharge Plan Renewal GW-60  
Milagro Gas Plant  
San Juan County, New Mexico**

Dear Ms. Gooding:

The Ground Water Discharge Plan renewal (GW-60) for Williams Field Services' (WFS) Milagro Gas Plant located in the SW/4 SE/4 of Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The ground water discharge plan consists of the plan approved March 21, 1991 and the renewal application submitted December 15, 1995.

The discharge plan renewal was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. It is renewed pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F. which provide for possible future amendments or modifications of the plan. Please be advised the approval of this plan does not relieve WFS of liability should their operation result in pollution of surface water, ground water or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3107.C. WFS is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Mr. Leigh Gooding  
January 18, 1996  
Page 2

Pursuant to Section 3109.G.4., this plan is for a period of five (5) years. This approval will expire on March 21, 2001, and WFS should submit an application in ample time before this date.

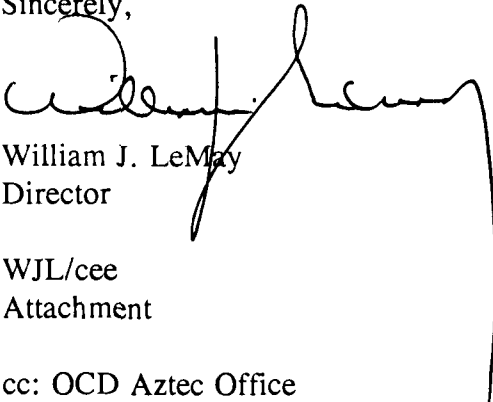
The discharge plan application for the WFS Milagro Gas Plant is subject to WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (\$50) dollars plus the flat fee of one thousand sixty-seven dollars and 50 cents (\$1667.50), for renewals of gas plant discharge plans.

The Oil Conservation Division (OCD) has not received WFS's fifty dollar (\$50.00) filing fee. The flat fee for an approved discharge plan may be paid in a single payment at the time of approval, or in equal installments over the duration of the plan, with the first payment due at the time of approval. The flat fee (total payment or the first installment) is due upon receipt of this letter.

Please make all checks payable to: **NMED - Water Quality Management** and send to the OCD Santa Fe Office.

On behalf of the staff of the OCD, I wish to thank WFS for their cooperation during this discharge plan review.

Sincerely,



William J. LeMay  
Director

WJL/cee  
Attachment

cc: OCD Aztec Office

ATTACHMENT TO DISCHARGE PLAN GW-60 APPROVAL  
WILLIAMS FIELD SERVICES  
MILAGRO GAS PLANT  
DISCHARGE PLAN REQUIREMENTS  
(January 17, 1996)

1. Fee Payment: The one thousand sixty-seven dollars and 50 cents (\$1667.50) flat fee for the discharge plan renewal shall be paid in full upon receipt of this letter.
2. Drum Storage: All drums will be stored on pad and curb type containment.
3. Tank Inspection: All tanks will be cleaned out and inspected prior to renewal of the discharge plan.
4. Sump Inspection: All sumps will be cleaned and inspected on an annual basis. All inspections will be documented and recorded for a period of five (5) years and the records made available to OCD inspectors upon request. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.
5. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
6. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
7. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.
8. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.
9. WFS Commitments: WFS will abide by all commitments submitted in the discharge plan application.
10. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure..
11. Transfer of Discharge Plan: Prior to any transfer of ownership, control or possession of this facility, the OCD will be notified. A written request must be submitted and approved by the OCD prior to the transaction.
12. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility, a closure plan will be submitted to the OCD for approval by the Director.

I hereby acknowledge receipt of check No. [REDACTED] dated 12/4/95  
or cash received on 12/18/95 in the amount of \$ 50.00  
from Williams Field Services  
for Milagros Plant GW-06U  
(Facility Name) (DP No.)  
Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Submitted to ASD by: F. Anderson Date: 1/16/96  
Received in ASD by: Angela Herrera Date: 1-17-96  
Filing Fee X New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)  
Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

*Franklin*  
VICE PRESIDENT  
AUTHORIZED REPRESENTATIVE

Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT

12/04/95

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
112795	APPLICATION FEES	11/27/95	50.00	0.00	50.00
<div data-bbox="961 506 1413 859" data-label="Text"> <p><b>RECEIVED</b>  DEC 17 1995  DEC 18 1995  Environmental Bureau  OEQ Environmental Division  Oil Conservation Division</p> </div>			50.00	0.00	50.00

PLEASE DETACH BEFORE DEPOSITING



**ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH**

I hereby acknowledge receipt of check No. [REDACTED] dated 5/8/95,  
or cash received on 5/12/95 in the amount of \$ 1212.50

from Williams Field Services

for Milagro GP GW-60  
(Factory Name) (GP No.)

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Submitted to ASD by: Roger Anderson Date: 5/12/95

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee X New Facility \_\_\_\_\_ Renewal \_\_\_\_\_

Modification X Other \_\_\_\_\_  
(Priority)

Organization Code 521.07 Applicable FY 95

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment       

**WILLIAMS FIELD SERVICES COMPANY**  
ONE OF THE WILLIAMS COMPANIES 

P. O. Box 58900  
Salt Lake City, Utah 84158-0900

Corestates Bank of Delaware, N.A.  
In cooperation with 1st Interstate Bank  
62-22  
311

DATE	CHECK NO.	NET AMOUNT
05/08/95	[REDACTED]	1717.50

PAY

PAY  
ONE THOUSAND SEVEN HUNDRED SEVENTEEN AND 50/100-----

TO THE  
ORDER  
OF

NMED-WATER QUALITY MANAGEMENT  
2040 SO. PACHECO  
SANTA FE NM 87505

Williams Field Services Company

Williams Field Services Co  
*Franklin*  
VICE PRESIDENT  
AUTHORIZED REPRESENTATIVE

Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT

05/08/95

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
42695	FILLING FEE AND MO <i>56-60 Meters mod</i>	04/26/95	1717.50	0.00	1717.50
			1717.50	0.00	1717.50

PLEASE DETACH BEFORE DEPOSITING



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

April 26, 1995

CERTIFIED MAIL

RETURN RECEIPT NO.P-176-012-132

Ms. Leigh Gooding  
Williams Field Services, Inc.  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900

**RE: Discharge Plan Modification GW-60  
Milagro Gas Plant  
San Juan County, New Mexico**

Dear Ms. Gooding:

The Oil Conservation Division (OCD) has received Williams Field Services' (Williams) request dated March 17, 1995 to modify the previously approved ground water discharge plan for the Milagro Gas Plant located in the SW/4 SE/4 of Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The ground water discharge plan consists of the application dated December 3, 1990 and materials dated January 24, 1991 submitted as supplements to the application. The modification request concerns an addition of a fourth boiler, a fourth amine train, and the proposed installation of a cogeneration facility.

The above referenced requested modification of the previously approved ground water discharge plan, GW-60, **is hereby approved under the conditions contained in the enclosed attachment.**

The application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3-107.C and is approved pursuant to WQCC Regulation 3-109.

Please note that Section 3-104 of the WQCC regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C, you are required to notify the Director of any facility expansion, production increase or process modification that would result in a significant modification in the discharge of potential ground water contaminants.

The ground water discharge plan modification request for the Williams Field Services, Inc. Milagro Gas Plant is subject to WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan modification renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half the flat fee, or one thousand six hundred sixty-seven dollars and fifty cents (\$1667.50), for gas plants.

Mr. Leigh Gooding  
April 26, 1995  
Page 2

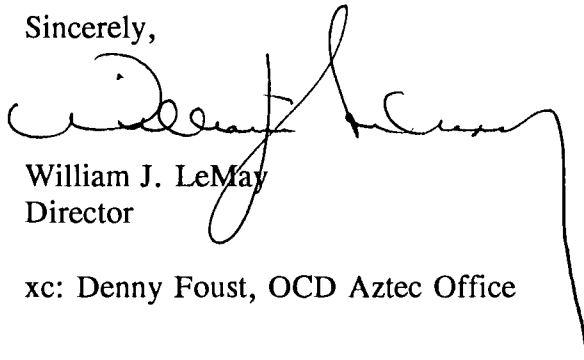
The OCD has **not** received your fifty dollar filing fee. The modification fee for an approved discharge plan may be paid in a single payment at the time of approval, or in equal installments over the duration of the plan, with the first payment due at the time of approval. The modification fee and filing fee are due upon receipt of this letter.

Please make all checks payable to: **NMED - Water Quality Management** and send to the OCD Santa Fe Office.

Please be advised that OCD approval of this modification does not relieve Williams of liability should its operation result in pollution of surface water, ground water or the environment. Nor does OCD approval relieve Williams of responsibility for compliance with other federal, state or local laws and/or regulations.

On behalf of the staff of the OCD, I wish to thank Williams Field Services and their staff for your cooperation during this discharge plan modification review.

Sincerely,

A handwritten signature in black ink, appearing to read 'William J. LeMay', with a long, sweeping horizontal line extending to the right.

William J. LeMay  
Director

xc: Denny Foust, OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-60 MODIFICATION APPROVAL  
WILLIAMS FIELD SERVICES, INC.  
MILAGRO GAS PLANT  
DISCHARGE PLAN REQUIREMENTS  
(April 26, 1995)

1. Payment of Discharge Plan Fees: The \$50.00 filing fee and the \$1667.50 modification fee will be paid upon receipt of this approval.
2. Drum Storage: All drums will be stored on pad and curb type containment.
3. Sump Inspection: Any new sumps or below-grade tanks will incorporate leak detection in their designs.
4. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
5. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
6. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

March 21, 1991

CERTIFIED MAIL  
RETURN RECEIPT NO. P-327-278-109

Mr. H. Spencer George, Manager  
Process Engineering  
Williams Field Services  
P. O. Box 58900  
Salt Lake City, Utah 84158-0900

RE: Discharge Plan GW-60  
Milagro Plant - San Juan County, New Mexico

Dear Mr. George:

The groundwater discharge plan GW-60 for the Williams Field Services Milagro Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM San Juan County, New Mexico is hereby approved. The discharge plan consists of the application dated December 3, 1990 and materials dated January 24, 1991 submitted as supplements to the application.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is renewed pursuant to Section 3-109.A., please note Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

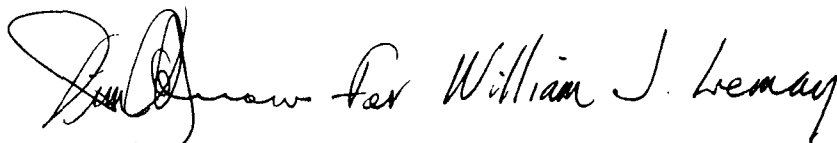
Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4., this plan approval is for a period of five (5) years. This approval will expire March 19, 1996 and you should submit an application for renewal in ample time before that date. It should be noted that all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of an underground drainage testing program as a requirement for discharge plan renewal.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

A handwritten signature in cursive script, reading "William J. LeMay". The signature is written in dark ink and is positioned above the printed name and title.

William J. LeMay  
Director

WJL/RCA/sl

cc: OCD Hobbs Office