

GW - 60

ENFORCMENT

DATE:

7-25-1996



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

July 25, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-394

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

RE: NOTICE OF VIOLATION
Discharge Plan (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' 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, was approved January 18, 1996. In association with the renewal of the discharge plan the facility was inspected April 17, 1996. During the inspection it was noted lab waste was being discharged to a septic leach field located at the facility. This is a violation of the approved discharge plan and classifies the leach field as a Class V (possibly Class IV) injection well pursuant to Federal Underground Injection Control definitions. The New Mexico Oil Conservation Division strictly prohibits this method of disposal.

The New Mexico Oil Conservation Division requires Williams Field Services, Inc. immediately cease discharges of industrial waste to the leach field and submit the following within 30 days of receipt of this letter:

1. A work plan to investigate the subsurface for potential contamination will be submitted by Williams Field Services to the Santa Fe OCD Division office. The work plan shall include the following :
 - Proposed analytical methods for profiling of the soils, sludges, and wastewater associated with the perimeter and interior of the well to determine the potential contamination of the well, the constituents of concern will be in accordance with 40 CFR Part 261 and WQCC Regulations.

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US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

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PS Form 3800, April 1995

Ms. Leigh Gooding

July 25, 1996

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- A comprehensive listing of all wastes that have been discharged to the well.
- 2. A proposal to modify the existing discharge plan for the proper disposition of the laboratory waste(s).

Future violations can subject Williams Field Services to the penalty provisions provided in Section 74-6-10 NMSA 1978 of the New Mexico Water Quality Act and Williams Field Services may be assessed civil penalties up to \$ 15,000 per day.

If you have any questions please contact me at (505) 827-7152 or Pat Sanchez at (505)-827-7156.

Sincerely,



Roger C. Anderson
Bureau Chief

RCA/pws

xc: Mr. Denny Foust, New Mexico Oil Conservation Division Aztec Office.
Mr. Coby Muckelroy, New Mexico Environment Department, Hazardous and Radioactive Materials Bureau.