

**GW - 112**

**PERMITS,  
RENEWALS,  
& MODS**

**Application**

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

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

Revised June 10, 2003

Submit Original  
Plus 1 Copy  
to Santa Fe  
1 Copy to Appropriate  
District Office

**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 (Carracas CDP Compressor Station, GW-112)

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, NM 87413

Contact Person: David Bays

Phone: 505-634-4951

3. Location: Section 34 Township 32 North Range 5 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: David Bays

Title: Sr. Environmental Specialist

Signature: David Bays

Date: Jan. 30, 2006

E-mail Address: david.bays@williams.com



## Carracas Compressor Station

### NMOCD Discharge Plan GW-112

Williams Field Services  
188 CR 4900  
Bloomfield, NM 87413

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## **1.0 TYPE OF OPERATION**

The Carracas CDP Compressor Station was built in 1992 to provide metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Ignacio Plant.

## **2.0 LEGALLY RESPONSIBLE PARTY**

Williams Field Services  
188 CR 4900  
Bloomfield, NM 87413  
(505) 634-4951

Contact Person:  
David Bays, Senior Environmental Specialist  
Phone and Address, Same as Above

## **3.0 LOCATION OF FACILITY**

The Carracas CDP Compressor Station is located in Section 34, Township 32 North, Range 5 West, in Rio Arriba County, New Mexico, approximately 36.4 miles east of Aztec, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangles: Bancos Mesa, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

## **4.0 LANDOWNER**

Williams Field Services (WFS) is leasing the subject property from:


U.S. Forest Service  
644 E. Broadway  
Bloomfield, NM 87413  
505-632-2956

## **5.0 FACILITY DESCRIPTION**

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation of three 1378-hp (site-rated) engines and two natural gas dehydrators. Compressors and dehydrators may be installed or removed to meet demand. In addition, there are various storage tanks, support structures and ancillary equipment.

## **6.0 SOURCE, QUANTITY AND QUALITY OF EFFLUENTS AND WASTE SOLIDS**

The source, quantity, and quality of effluent and waste solids generated at the plant are summarized in Table 1.

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## 7.0 TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND WASTE SOLIDS

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, certain absorbents, spill residues, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, laboratory waste, empty drums, and waste water. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

Non-exempt waste management will be conducted in accordance with NMOCD requirements including the preparation of a Certificate of Waste Status for each non-exempt waste stream. Non-exempt wastes will be analyzed at a minimum for BTEX, TPH, RCRA D-List metals, ignitability, corrosivity, and reactivity to initially determine if such waste are hazardous as defined in 40 CFR Part 261. All wastes at the facility will be periodically surveyed for naturally occurring radioactive material (NORM) to determine if the concentrations of radium 226 exceed 30 picocuries per gram or if radiation exposure exceeds 50 microroentgens per hour. If affirmed, such materials will be handled and disposed in accordance with NMOCD NORM Regulations.

Barring facility modification and/or process changes, the classification of non-exempt wastes by laboratory analyses will be made once during the approval period of this plan. Subsequent laboratory analyses will be performed at the generator's discretion (minimum of once every five years), or more frequently to comply with waste acceptance procedures of the disposal facility.

## 8.0 STORM WATER PLAN


This storm water section was developed to provide a plan to monitor and mitigate impact to storm water runoff from the facility. It serves to satisfy storm water management concerns of the NMOCD. It is not intended to comply with 40 CFR Part 122, Storm Water Discharges as this facility is excluded in 122.26 (c) (1) (iii).

This section concentrates on the identification of potential pollutants, inspection and maintenance of the pollutant controls, and gives a description of structural controls to prevent storm water pollution.

### 8.1 Site Assessment and Facility Controls

An evaluation of the material used and stored on this site that may be exposed to storm water indicates that no materials would routinely be exposed to precipitation. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms, curbs, or emergency response actions, could flow overland to open off-site drainage

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ditches (arroyos) and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.

## 8.2 Best Management Practices

Following are Best Management Practices (BMPs) to be implemented to prevent or mitigate pollution to storm water from facility operations:

- All waste materials and debris will be properly disposed of on an on-going basis in appropriate containers and locations for collection and removal from the site.
- Temporary storage of potential pollutant sources will be located in areas with appropriate controls for storm water protection. This would include ensuring all containers are sealed/covered and otherwise protected from contact with precipitation.
- Periodic inspection of channels and culverts shall be performed at least twice annually and after any major precipitation event.
- Sediment deposits and debris will be removed from the channels and culverts as necessary and any erosion damage at the outfall (if any) will be repaired or controlled.
- Conduct inspections of the facility on a regular basis as part of the preventive maintenance site check. Such inspections will include the visual assessment of corroded or damaged drums and tanks, broken or breached containment structures, collapsed or clogged drainages or drain lines.

Implementation of the BMPs will prevent or mitigate impact to storm water runoff from this facility.

## 9.0 INSPECTION, MAINTENANCE AND REPORTING

Williams' personnel will operate and maintain the facility. The facility will be remotely monitored for equipment malfunctions and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. Regular inspections will be conducted throughout the facility. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

In the event of a release of a reportable quantity, the operator reports the release to a contracted spill notification service. The service immediately notifies the Williams Environmental Department and all appropriate agencies.



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### 10.0 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Spill containment berms around above ground storage tanks will be designed to contain 133% of the tank capacity. The below-grade tanks will be constructed with a means of leak detection, and will either be double-walled tanks, double-bottomed tanks or a tank set on an impermeable pad.

Williams' corporate policy and procedure for Release Reporting and Pollution Prevention and Control are included in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).

### 11.0 SITE CHARACTERISTICS

The Carracas CDP Compressor Station is located approximately 36.4 miles east of Aztec, New Mexico. The facility is located on the southern edge of Carracas Mesa, at an elevation of approximately 6360 feet. The natural ground surface topography slopes downward toward the west. The maximum relief over the site is approximately 25 feet. Intermittent flow from the site will follow natural drainage to the west to the Peters Canyon drainage. Peters Canyon drains to the south into Bancos Canyon Wash. Bancos Canyon Wash drains to the west into Navajo Lake. The Navajo Lake, approximately 2.1 miles to the southwest of the site, is the nearest down-gradient perennial source of surface water, at an elevation of approximately 6100 feet.

A review of the available hydrologic data (1,2) for this area revealed that there are no water wells within a ¼-mile radius of Carracas CDP Compressor Station. The water-bearing unit in this area is the San Jose Formation. The San Jose Formation is the youngest Tertiary bedrock unit. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 200 to 500 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 PPM.

The 100-year 24-hour precipitation event at a regional weather station is 2.8 inches. This small amount of rainfall for the area should pose minimal flood hazards. When practical, surface water runoff from the area surrounding the site is to be diverted around the facility into the natural drainage path. Vegetation in the area consists predominantly of sagebrush and native grasses.

#### References

<sup>1</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.

<sup>2</sup>Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2005.





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### 12.0 FACILITY CLOSURE PLAN

All reasonable and necessary measures will be taken to prevent the exceedence of WCQQ Section 3103 water quality standards should Williams choose to permanently close the facility. Williams will submit a detailed closure plan to the NMOCD prior to closure.

Generally, closure measures will include removal or closure in place of underground piping and other equipment. All wastes will be removed from the site and properly disposed in accordance with the rules and regulations in place at the time of closure. When all fluids, contaminants, and equipment have been removed from the site, the site will be graded as close to the original contour as possible.

Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

# TABLES

**TABLE 1**  
**SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS**  
**CARRACAS CDP COMPRESSOR STATION**

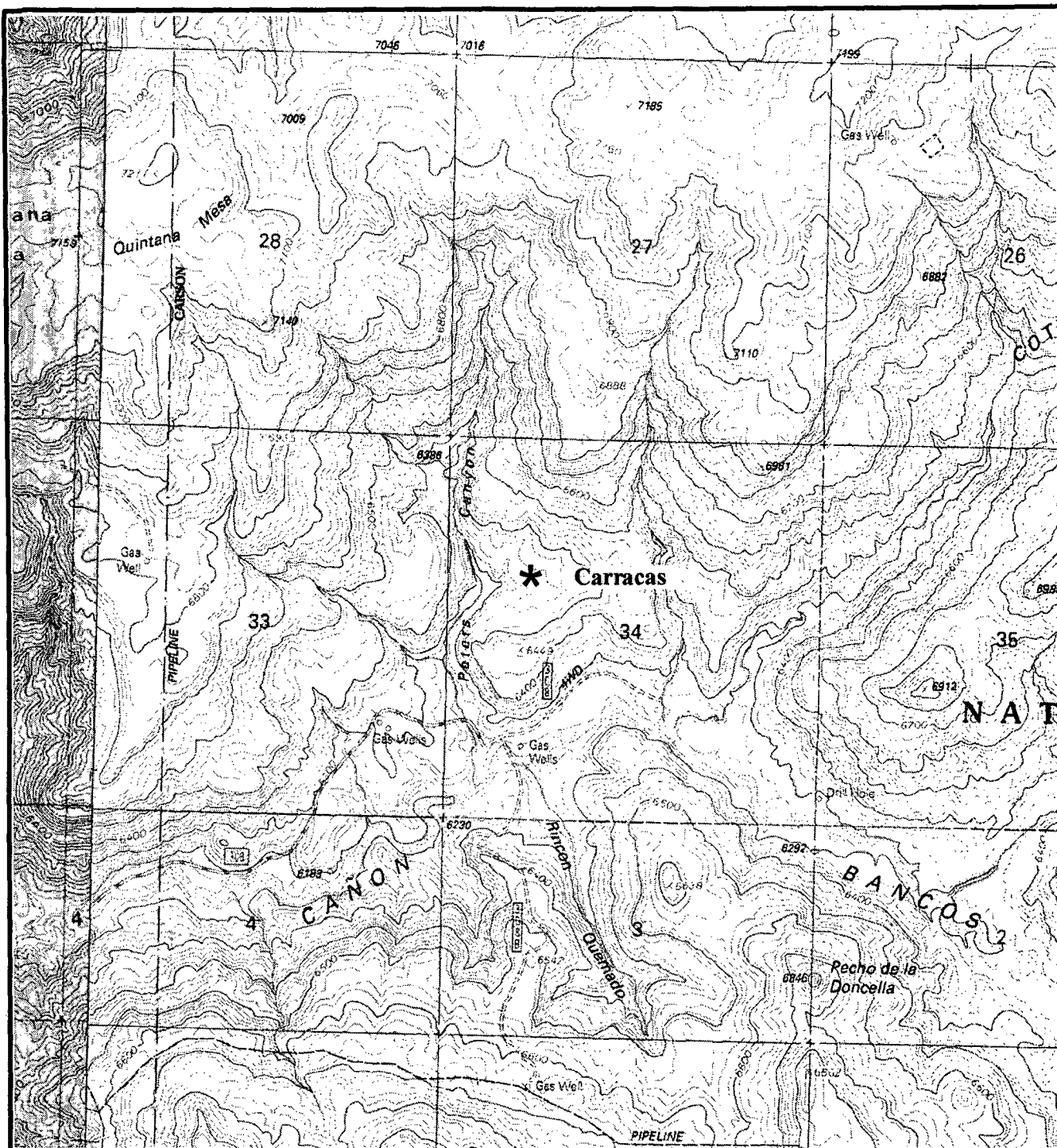
PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Produced Water	Scrubber, Gas Inlet Separator	2000-6000 bbl/year	No Additives
Wash Down Water	Compresor Skid	500-5000 gal/year/engine	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressor	1000-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	50-500/year/engine	No Additives
Used Process Filters	Air, Inlet, Fuel Gas	75-500/year	No Additives
Empty Drums/Containers	Liquid Containers	0-80/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

**TABLE 2**  
**TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS**  
**CARRACAS CDP COMPRESSOR STATION**

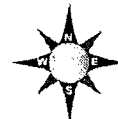
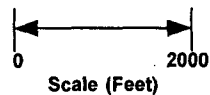
PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Produced Water/Waste Water	Above Ground Storage Tank	6300 gal	Earthen Berm and Vault	Exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Waste Water/Washdown Water	Above Ground Storage Tank	6930 gal	Earthen Vault	Non-exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Used Oil	Above Ground Storage Tank	6930 gal	Earthen Vault	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.	Non-exempt	
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.	Exempt	
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 to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.	Non-exempt	
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.
Glycol	Above Ground Storage Tank	500 gal 100 gal* 50 gal*	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Corrosion Inhibitor	Above Ground Storage Tank	500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above Ground Storage Tank	4200 gal 500 gal*	Earth Berm and Vault Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

\*Number of tanks installed dependent on number of engines/dehy's installed on site.

# FIGURES



Source: USGS Bancos Mesa and Bancos Mesa NW,  
NM Quadrangles



**Figure 1 Site Vicinity / Topographic Map**  
**Carracas Compressor Station**  
 Section 34, Township 32N Range 5W  
 Rio Arriba County, New Mexico

## Subject or Title:


[illegible]

## **APPENDICES**



**Appendix A**  
**WFS Spill Control Procedures**

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	<b>System Integrity Plan</b>	Element: Environmental Protection	Document No: 6.04-ADM-001	
		Revision No: 6	Revision Date: 01/01/05	Page: 1 of 8
Procedure: <b>POLLUTION PREVENTION AND CONTROL</b>				

## 1.0 PURPOSE

- 1.1 To outline the conditions under which facilities are subject to the requirements of the EPA Oil Pollution Prevention program, specify the actions required at facilities to comply with pollution prevention and/or response plans, and to ensure facilities are in compliance with all applicable oil pollution prevention regulations.

## 2.0 PROCEDURE

- 2.1 At least Annually, perform visual inspections of oil storage tanks and containers (single containers with capacities >55 gallons) for signs of deterioration, discharges or accumulation of oil inside diked areas. Document Inspections on 0019 – External Visual Tank Inspection form.
- 2.2 Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with SIP-ADM-7.15 - Aboveground Storage Tank Integrity
- 2.3 Perform maintenance or repairs necessary to prevent or stop leaks or releases and document the work following company maintenance and repair procedures.
- 2.4 Maintain appropriate spill response equipment at an easily accessible location at the facility and ensure facility personnel are trained on the materials and their use(s).
- 2.5 Routine releases of storm water from containment areas shall be documented on WES-87 – Record of Secondary Containment Discharge. All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
- 2.6 **Facility Pollution Prevention Plans**
  - 2.6.1 The oil pollution prevention regulations include two plans related to non-transportation onshore facilities. The most common is the Spill Prevention Control and Countermeasure (SPCC) Plan. The second is the Facility Response Plan (FRP).
    - 2.6.1.1 An SPCC Plan is a written document that describes the steps a facility takes to prevent oil spills and to minimize the risk of harm to the environment.
    - 2.6.1.2 A Facility Response Plan is a written document that

describes the procedures for responding to a spill.

**NOTE**

If your facility requires a Facility Response Plan (FRP), it will include an Emergency Response Action Plan (ERAP), which is equivalent to a Williams Emergency Response Plan (ERP). Therefore, if a facility has an FRP, the Environmental Specialist will be responsible for preparation of the ERAP, and a separate ERP (as required by SIP-ADM-12.01 - Emergency Response and Planning) is not required. See 6.04-ADM-003 – Plans Required for Facilities-Pipelines to determine the plans applicable to your facility/pipeline.

- 2.6.2 The Environmental Specialist is responsible for preparation of SPCC plans or FRPs.
- 2.6.3 Operations is responsible for:
  - 2.6.3.1 Reviewing draft plan(s), providing comments to the Environmental Specialist (ES) and meeting published timeframes for reviews and comments
  - 2.6.3.2 Ensuring it is capable of complying with the document upon publication
  - 2.6.3.3 Reviewing the plan(s) Annually and providing revisions or updates to the ES
  - 2.6.3.4 Performing inspections required by the plan(s)
  - 2.6.3.5 Maintaining documentation required by the plan(s) on the appropriate forms
  - 2.6.3.6 Conducting annual drills if an FRP is in-place for the facility
  - 2.6.3.7 Ensuring adequate response contractors are available in the area
  - 2.6.3.8 Providing to the ES a current site survey to allow for secondary containment calculations to be conducted.
- 2.6.4 Requirements to Maintain Records - The facility is required to maintain all inspection logs, secondary containment drainage logs, etc., for a period of 5 years. These records must be maintained in a centralized location at the facility and must be easily accessible to an inspector.
- 2.6.5 Requirements to Maintain the EMIS - The EMIS will be populated with all requirements of the facility's plans (SPCC/FRP) and any associated best management practices. The Environmental Group (ES, and CA) is responsible for maintaining the database.

- 2.6.6 Training Requirements – The Federal regulations for oil pollution prevention require annual training on the facility's plans and an overall education on plan requirements/purpose. Operations is responsible for ensuring all personnel receive the required SPCC/FRP training on an annual basis. This training may be coordinated with the Environmental Specialist as part of the required annual review.

### 3.0 REFERENCES

#### 3.1 Regulatory

- 3.1.1 Oil Pollution Prevention Act of 1990
- 3.1.2 40 CFR 112, Oil Pollution Prevention (EPA)
- 3.1.3 Applicable state, regional and local regulations

#### 3.2 Related Policies/Procedures

- 3.2.1 Training CD for SPCC Plans
- 3.2.2 SIP-ADM-7.15 - Aboveground Storage Tank Integrity

#### 3.3 Forms and Attachments

- 3.3.1 WES-87 – Record of Secondary Containment Discharge
- 3.3.2 WES-35 - Release Report Form
- 3.3.3 6.04-ADM-002 - Release Reporting
- 3.3.4 6.04-ADM-003 – Plans Required for Facilities-Pipelines
- 3.3.5 0019 – External Visual Tank Inspection
- 3.3.6 SIP-ADM-12.01 - Emergency Response and Planning
- 3.3.7 Spill Prevention Control and Countermeasure (SPCC) Plan
- 3.3.8 Facility Response Plan
- 3.3.9 SIP Feedback/Change Request

### 4.0 DEFINITIONS

- 4.1 **Aboveground Storage Tank (AST)** – A tank that has all its surfaces above the existing grade so as to allow visual inspection of all the tank surfaces.
- 4.2 **DOT** – Department of Transportation
- 4.3 **EPA** – Environmental Protection Agency

- 4.4 Facility** – Any terminal, facility, pipeline, etc. owned or operated by Williams.
- 4.5 Facility Response Plan** - Required for any non-transportation related facility that could be expected to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines.
- 4.6 MMS** – Minerals Management Service
- 4.7 Navigable Waters** – The Clean Water Act defines the navigable waters of the United States as the following: all navigable waters, as defined in judicial decisions prior to the passage of the Clean Water Act, and tributaries of such waters; interstate waters; intrastate lakes, rivers, and streams that are used by interstate travelers for recreational or other purposes; and intrastate lakes, rivers, and streams from which fish and shellfish are taken and sold in interstate commerce.
- 4.8 Oil** – Oil of any kind or any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. The EPA accepts the definition of oil as the list provided by the USCG at <http://www.uscg.mil/vrp/faq/oil.shtml>.
- 4.9 Oil Pollution Act (OPA) of 1990** – OPA 1990 requires regulated facilities to submit spill response plans that address the facility owner's or operator's ability to respond to a "worst-case discharge." OPA 90 is being implemented by EPA under 40 CFR 112, Oil Pollution Prevention, Section 112.20, Facility Response Plans.
- 4.10 Oil Spill Response Plan** – An Oil Spill Response Plan provides information on responding to a spill at a facility and is intended to satisfy the requirements of the Oil Pollution Act of 1990; Facility Response Plan requirements of 40 CFR 112, Oil Pollution Prevention (EPA); Pipeline Response Plan requirements of 49 CFR 194, Response Plans for Onshore Oil Pipelines (RSPA); Facility Response Plan requirements of 33 CFR 154 Subpart F, Response Plans for Oil Facilities (USCG); and 30 CFR 254, Oil-Spill Response Requirements for Facilities Located Seaward of the Coast Line (MMS).
- 4.11 OSRO** – Oil Spill Response Organization
- 4.12 PREP** – National Preparedness for Response Exercise Program
- 4.13 Release** – synonymous with spill in this document. Williams' definition of a release is contained in the Release Reporting Guidelines which is maintained by the Environmental Group.
- 4.14 RSPA** – Research and Special Programs Administration
- 4.15 Spill Prevention, Countermeasures, and Control (SPCC) Plan** – An SPCC Plan provides information on spill prevention at a facility and is intended to satisfy the requirements of the SPCC Plan requirements in 40 CFR 112, Oil Pollution Prevention.

**4.16 Underground Storage Tank (UST)** – A tank that has all its surfaces below the existing grade.

**4.17 USCG** – United States Coast Guard

➤➤➤End of Procedure<<<


## System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
9/3/3	2.1.5	Deleted
	2.2.1 B	Added "O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and"
	2.2.2 B	Changed 48-72 to "4 working days"
	2.2.2 C	Changed to "For offshore releases: If the release is not reported to OOPS, the ES will complete the WES Release Report Form and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt. For releases reported to OOPS the ES will not distribute an initial report."
	2.2.3 B	Changed to "For off-shore or marine facility releases: The ES or Compliance Administrator will gather corrections and distribute the final report to all stakeholders via the final distribution list."
	2.3.3	Deleted Marine Facility and is responsible Rewrote to read "The Environmental Specialist is responsible for preparation of SPCC plans or FRP's."
10/24/03	2.2.4.1	Deleted "Controlled by Area FOA"
	2.3.4.3	Deleted "If release is not reported to Oops"
	2.2.4.3	Deleted "for releases reported to Oops, the ES will not distribute an initial report."
	2.2.5.2	Deleted "marine facility"
	2.2.6.1	Deleted "there is no specific timeframe to submit this information."
	2.3.3.1	Deleted "or the SPCC/FRP Program Manager"
	2.3.3.3	Deleted "or the SPCC/FRP Program Manager"
	2.3.5	Deleted "Program Manager" and "Local"
9/15/04	2.1	Deleted for manned facilities Deleted daily facility Deleted for unmanned facilities perform daily inspections. Added Document Inspections on 0018 – Visual External Inspections.
	2.2	New - Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with <u>SIP-ADM-7.15 - Aboveground Storage Tank Integrity</u> Renumbered

	2.5	New Routine releases of storm water from containment areas shall be documented on <u>WES-87 – Record of Secondary Containment Discharge</u> . All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
	2.5	<p>Deleted:</p> <p>When to Initiate</p> <p>2.5.1 The first person to discover a spill/release at a facility will immediately take appropriate action to protect life, and ensure safety of personnel. An attempt will be made to mitigate the effects of the spill by terminating operations, closing valves, or taking other measures to stop the leak or spill as long as personnel are not in danger.</p> <p>2.5.2 For onshore releases: If the spill is reportable (refer to <u>6.04-ADM-002 - Release Reporting</u> procedure), the appropriate person (usually person discovering the release) will immediately notify the 24 hour O&amp;TS release hotline at 1-888-677-2370 and, if necessary, local emergency response personnel/contractors.</p> <p style="text-align: center;"><b>NOTE</b></p> <p>The current 24 hour O&amp;TS release hotline is managed by a contractor, 3E. 3E provides 24-hour service/support, to include reporting major incidents and providing on-demand MSDSs.</p> <p>2.5.3 Offshore releases: If the spill creates a sheen (refer to <u>6.04-ADM-002 - Release Reporting</u> procedure), the appropriate person (usually person discovering the release) will immediately notify O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and the Environmental Specialist or his/her management team.</p> <p>2.5.4 Receiving and reviewing the initial release report</p> <p>2.5.4.1 Onshore releases: Within 24 hours, 3E will distribute an initial release report to the Area. The initial distribution will be made via Area e-mail boxes.</p> <p>2.5.4.2 Each person that receives an initial report is required to review the report for correctness and clarity. All corrections must be provided to 3E in a return e-mail within 4 working days of receipt.</p> <p>2.5.4.3 Offshore releases: The ES will complete the <u>WES-35 - Release Report Form</u> and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt.</p> <p>2.5.5 Receiving a final release report</p>



		<p>2.5.5.1 Onshore releases: 3E will gather the corrections from the initial release report and distribute a final report within 5 days of the release. The final report is sent to a distribution list controlled by Williams.</p> <p>2.5.5.2 Off-shore releases: The ES or Compliance Administrator will gather corrections and distribute the final report to all stakeholders using the appropriate area and final distribution lists.</p> <p>2.5.6 Providing Follow-up Information on the Release</p> <p>2.5.6.1 The Operations Manager or his/her designee shall notify the local Environmental Specialist of the specific response measures taken to respond to the release and all follow-up actions that were taken as a result of the spill or release, if this information was not reported to 3E. It is recommended that the update be provided within 2 workdays of the actions being completed.</p>
	2.6 Note Box	Added See 6.04-ADM-003 – Plans Required for Facilities- <u>Pipelines</u> to determine the plans applicable to your facility/pipeline.
	2.6.6	Added This training may be coordinated with the Environmental Specialist as part of the required annual review.
	3.3.4	Added 0018 – Visual External Inspections Renumbered
	4.6	Deleted Hydrocarbons and Other Fluids definition

	<b>System Integrity Plan</b>	System Integrity Plan	Document No. <b>6.04-ADM-002</b>	
		Revision No: <b>7</b>	Effective Date: <b>01/01/05</b>	Page: <b>1 of 10</b>
Procedure: <div style="text-align: center;"><b>RELEASE REPORTING</b></div>				

## 1.0 PURPOSE

- 1.1 To define the process for reporting releases and certain other events. The terms "release" and "spill" may be used synonymously within this procedure.

**Note 1:**

Due to the rigid timeframes for reporting to regulatory agencies (usually within one hour of an event) and the possibility for penalties associated with delayed reporting, **it is imperative that releases and events requiring reporting by this procedure are reported immediately. If you are unsure of the release amount do not delay reporting by attempting to exactly determine the amount. Report immediately with an estimate, and correct later.**

**Note 2:**

Third parties operating Company facilities (i.e., Hanover / POI) are responsible for reporting in accordance with this procedure.

## 2.0 PROCEDURE

### 2.1 Offshore Release Reporting (w/sheen on water)

- 2.1.1 Immediately report to O'Brien's Oil Pollution Services (OOPS) at 985-781-0804, your Environmental Specialist, and the DOT Compliance Coordinator (Tulsa) the following type(s) of offshore release(s):

2.1.1.1 Any release that causes sheen on water.

- 2.1.2 OOPS will immediately make the required telephonic notifications and submit written reports to the appropriate regulatory agencies, the appropriate Qualified Individual (QI), and the Environmental Specialist.

### 2.2 Offshore Release Reporting (w/o sheen on water)

- 2.2.1 Immediately report to your Environmental Specialist and the DOT Compliance Coordinator (Tulsa) the following type(s) of offshore release(s) or event(s):

2.2.1.1 Any Gas release >50 MSCF;

2.2.1.2 Any event that involves a release of any amount of Gas or Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility and a death or personal injury necessitating in-patient hospitalization;

2.2.1.3 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or Hazardous Liquids lost **and/or**, costs of clean up or recovery of the operator **and/or** others  $\geq$  \$50,000;

- 2.2.1.4 Any unintentional, non-maintenance related release  $\geq 5$  gallons of a Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;
- 2.2.1.5 Any release of Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or
- 2.2.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.3.2.1 through 2.3.1.6.
- 2.2.2 The Environmental Specialist and the DOT Compliance Coordinator will determine reportability and, if required, perform telephonic notifications in accordance with applicable regulations.
- 2.2.3 The Environmental Specialist will complete the WES - 35 Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 10 working days.
- 2.2.4 The Environmental Specialist will complete any required follow-up written reports and/or documentation for non-transportation events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.
- 2.2.5 The DOT Compliance Coordinator will complete any required follow-up reports and/or documentation for transportation related events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.

### 2.3 Onshore Releases

- 2.3.1 Immediately report to 3E Company at 888-677-2370 (toll free) the following type(s) of onshore release(s) or event(s):
  - 2.3.1.1 Any liquid release that enters, or is expected to enter, any waterway (i.e., ditch, arroyo, intermittent stream, etc.);
  - 2.3.1.2 Any individual liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.)  $> 1$  gallon;
  - 2.3.1.3 Any cumulative liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.)  $> 5$  gallons within a 24-hour period (drips, pinhole leaks, etc.). (NOTE: Report immediately upon determining, or suspecting that the 5 gallon/24 hour threshold will be met or exceeded);
  - 2.3.1.4 Any Gas release  $> 50$  MSCF;
  - 2.3.1.5 Any event that involves a release of any amount of Gas or hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility and a death or personal injury necessitating in-patient hospitalization;

- 2.3.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or hazardous liquids lost and/or, costs of clean up or recovery of the operator and/or others  $\geq$  \$50,000;
- 2.3.1.7 Any unintentional, non-maintenance related release  $\geq$  5 gallons of a hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;
- 2.3.1.8 Any release of hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or
- 2.3.1.9 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.4.1.1 through 2.4.1.8.
- 2.3.2 3E Company will immediately make the required telephonic notifications in accordance with the Telephonic and Written Release Reporting Requirements.
- 2.3.3 Information that will be needed when reporting to 3E is on WES-35 - Release Report Form.
- 2.3.4 Refer to the Onshore Release/Spill Notification Flowchart for more information regarding the onshore reporting workflow.
- 2.3.5 The Environmental Specialist will follow-up with Operations to verify that adequate response and reporting measures have been taken for each release and track closure of each release report with appropriate regulatory agencies.

**Note:****Flares and Thermal Oxidizers**

Flares, thermal oxidizers and other pollution control devices typically have permit limits and conditions and may require tracking of flaring and/or other routine and/or non-routine events. Refer to your facility specific permit conditions. Immediately report any exceedance of permit limits or variance from permit to your Environmental Specialist, whom will notify the appropriate regulatory agency(s).

**2.4 Planned / Scheduled Blowdowns**

- 2.4.1 Notify your Environmental Specialist as far as possible in advance of planned / scheduled blowdowns that are not an exception per 2.5 of this procedure.
- 2.4.2 Be prepared to provide to your Environmental Specialist a current extended chromatographic analysis of the product to be released.

**2.4.3 The Environmental Specialist will:**

- 2.4.3.1 Review information provided;
- 2.4.3.2 Notify appropriate agencies;
- 2.4.3.3 Obtain required permits or permissions;
- 2.4.3.4 Provide Operations with any special conditions and / or limitations to be observed before, during, and/or after the planned / scheduled blowdown event; and
- 2.4.3.5 Perform any required post event reporting or follow-up to agencies.

**2.5 Exceptions to Procedure:**

- 2.5.1 Sheen on rainwater within facilities, dikes, valve boxes, etc.. that is not the result of a release event. However, one must follow proper disposal and housekeeping practices for these cases.
- 2.5.2 Routine releases to pollution control devices (flares, thermal oxidizers, etc.) **in accordance with permit conditions or limitations.**
- 2.5.3 Site-specific procedures may qualify as an exception, if reviewed and approved by your Environmental Specialist.

**2.5 Post Report Follow-up (for Remediation and Cost Purposes)**

- 2.5.1 Within 45 days of any release that affected soil or water, Operations will submit to the Environmental Specialist the following information:
  - 2.5.1.1 Quantity of soil, water, or product removed as a result of a release;
  - 2.5.1.2 Disposition of soil, water, or product removed (i.e., land, farm, landfill, disposal, etc.);
  - 2.5.1.3 Update of costs incurred because of release. (Includes value of lost product, repair costs response costs, clean up costs, disposal costs, etc.)
  - 2.5.1.4 Environmental Specialist will update release database with additional information from 2.5.1.1 through 2.5.1.3.

**2.6 Release Database**

- 2.6.1 The Tulsa Release Reporting Compliance Specialist will maintain the release database and update with follow-up information from 2.5.1.1 through 2.5.1.3 above.

### 3.0 REFERENCES

#### 3.1 Regulatory

3.1.1 Various regulatory requirements at the State and Federal levels require reporting of releases and/or release events.

3.1.2 49 CFR 191, 192 and 195

#### 3.2 Related Policies/Procedures

3.2.1 SIP-ADM-6.04 - Pollution Prevention and Spill Response

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

#### 3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

### 4.0 DEFINITIONS

4.1 **Liquid** - For the purposes of these reporting criteria, a substance should be considered a liquid if it is transported or stored in liquid form. Liquid releases should be reported using the measurement unit used when transporting the product (i.e., gallons/barrels).

4.2 **Gas** - For the purposes of these reporting criteria, a substance should be considered a gas if it is transported or stored in gaseous state. Gas releases should be reported using the measurement unit used when transporting the product (i.e., m.s.c.f.).

4.3 **Facility Boundary** - The Facility Boundary is the area within the fenced perimeter or the property line. If no fence or clear property line exists, then the facility boundary is that area clearly maintained by Operations (graveled, mowed, cleared, etc.), excluding pipeline rights-of-way.

4.4 **Offshore Release** - Any release that occurs seaward of the coastline or in an onshore Tidally Affected Zone.

- 4.5 **Onshore Release** - Any release that does not occur offshore in a Tidally Affected Zone.
- 4.6 **Tidally Affected Zone** - Relating to or affected by tides: *the tidal maximum; tidal pools; tidal waters.*
- 4.7 **DOT jurisdictional Pipeline or Pipeline Facility** – Pipeline or pipeline facility subject to 49 CFR Parts 192 or 195.
- 4.8 **Hazardous Liquid** – Per 49 CFR 195.2 - petroleum, petroleum products, or anhydrous ammonia.

>>>End of Procedure<<<

## System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
01/20/03		Added link to Onshore Release/Spill Notification Flowchart
	2.0	Deleted Scope
	3.1	<b>Deleted</b> "Certain Company operated assets can be the source of hydrocarbon or other fluid releases or atmospheric releases into the environment. Although we can learn much about our assets and operating practices by tracking <u>all</u> releases, the procedure below has been developed so that the Company can allocate its resources most appropriately. However, every spill situation is different: If there is a realistic risk of exposure to the public, livestock, the soil or ground water, the event and condition must be reported. <b>Proper reporting ensures a proper response.</b> " <b>Added</b> "This procedure applies to liquid and gas releases"
	3.2	Deleted "direct the administration of all Release reporting in their area and provide the following."
	3.2 bullet	Deleted "Provide reportable release volumes to Operations, as requested, for common routine, intentional, maintenance blow-down events."  Deleted "Compile all submitted release data to calculate total release-related associated costs for their area."  Rewrote to read "Submit release follow-up information to the applicable regulatory agencies"
	4.1	Added "Liquid releases should be reported using the measurement unit used when transporting the product"
	4.4	Added "A deliberate, controlled release of gaseous or liquid material to the environment"
	5.0	Deleted Responsibilities
	6.1	Added "Onshore"
7/11/03	1.0	Delete "The purpose of this procedure is to provide a standard method for determining what constitutes a", reportable and details instruction on what needs to be done when a reportable release occurs"
7/11/03	2.0	Delete "SCOPE"
	2.1	Deleted "Applies To - all of Williams Energy Services' domestic Midstream/NGL and inland Transportation and Terminal facilities."



	2.2	Deleted "Exceptions - Williams Energy Canada (WEC) Foreign assets, marine terminals, and offshore assets. Marine facilities and offshore assets will report releases in accordance with facility specific Offshore Spill Response Plans and reportable quantities. The Offshore Spill Notification Matrix should also be adhered to. Foreign locations WEC will report releases per their WEC management team's guidelines."
	3.1	Deleted "Certain Company operated assets can be the source of hydrocarbon or other fluid releases or atmospheric releases into the environment. Although we can learn much about our assets and operating practices by tracking all releases, the procedure below has been developed so that the Company can allocate its resources most appropriately. However, every spill situation is different: If there is a realistic risk of exposure to the public, livestock, the soil or ground water, the event and condition must be reported. Proper reporting ensures a proper response." Added "This procedure applies to liquid and gas releases."
	3.2	Deleted "Administration", "direct the administration of all Release reporting in their area and provide the following", "liquid maintenance", "Provide reportable release volumes to Operations, as requested, for common routine intentional maintenance blow-down events", "Compile all submitted release data to calculate total release costs for their area.", "Each Environmental Specialist will communicate to their respective Area the required timeframes for submittal." Added "Submit to the applicable regulatory agencies"
	4.0	Moved "Definitions" to end of document
	5.0	Deleted "Responsibilities" Section
7/11/03	6.1	Added "Offshore Releases - Operations will immediately report all offshore releases to O'Brien Oil Pollution Services (985-781-0804) and to the Environmental Specialist. O'Brien will make the required notifications and reports to the appropriate regulatory agencies in accordance with the (add O'Brien matrix)"
	6.1.1	Added "The Environmental Specialist will complete the WES 35 - Release Report Form and forward to the Compliance Specialist in Tulsa within 5 working days"
	6.2	Deleted "or their designee", "(or within 15 minutes if an ammonia release"
	6.2.1	Deleted "Due to a system/part failure", within a 24 hour period (unless excluded by", "Any non-maintenance release from a pipeline 5 gallons or greater (i.e., seal failure or leaking valve) Added "where the release", "within a 24-hour period"

## RELEASE REPORTING

6.04-ADM-002

	6.2.2	Deleted "Sheen on rainwater puddles in a facility (follow proper housekeeping practices)", NOTE – FLARES" "A permitted flare may have permit limits and may require tracking of flaring events Exceedance of permit limits must be immediately reported to your local Environmental Specialist, not to the toll free number", " with the exception of ammonia which must be reported for any release of 20 gallons (100 pounds) or more."  Added "Routine", "A permitted flare may have permit limits and may require tracking of flaring events. Exceedance of permit limits must be immediately report to your local Environmental Specialist not to the toll-free number"
	6.2.3	Deleted "can be found at the link provided in Section 7/3. (WES-35 – Release Report Form.xls). (Changed this to a link and changed the title of the link"  Added "onshore releases is listed in WES-35 Release Report Form
7/11/03	6.2.4	Deleted "NOTE - RESPONSE MEASURES The Environmental Specialist will contact local Operations to ensure adequate response measures have been taken for each release event and to track closure of each release event wit the appropriate regulatory agencies (if necessary).  Added "The third party contractor will notify the appropriate regulatory agencies in accordance with the Release Matrices"
	6.3	Change "90" to "45", "record" to "database"  Deleted "(KC filter press, contract disposal, etc.),",
	7.2.1	Added "Pollution Prevention and Spill Response"
	7.3	Added " <u>Release Report Form, WES-35</u> (changed the title of the link)" " <u>Offshore Incident Notification Matrix</u> ", " <u>Onshore Release/Spill Notification Flowchart</u> ", "O'Brien Matrix"
8/22/03	2.2.2	Added "Allow sufficient time for Operations..."
	2.0	Added "Written reports are required..." to Note section
	3.1.7	Deleted "within one hour of occurrence or discovery"
	2.4.7	Added "Some materials, such a ethylene/propylene..."
	2.4.12	Added "Louisiana allows 1.0 MMscf releases without approval or notification..."
	2.5	Added "Compliance Specialist" for maintaining database
9/3/3	3.3.3	Deleted "any release that exists an offshore platform and causes a sheen"

# RELEASE REPORTING

6.04-ADM-002

	3.3.3 D	<p>Deleted "MTBE, benzene, 1,3-butadiene"</p> <p>Deleted "Some materials, such a ethylene/propylene have a reduced RQ due to area attainment status (Baton Rouge, Louisiana), verify RQ in pounds when atmospheric releases occur."</p> <p>Added "This threshold may be modified by the ES for specific areas or facilities."</p>
	2.4.11	Deleted "Incidental" (i.e., not from a system/part failure) liquid releases less than 5 gallons of glycol, amine, methanol, condensate or other products, to include releases at truck loading racks"
	2.4.12	Changed to read "Intentional "blowdown" events (i.e., less than 5 bbls of propane/butane mix, or 50 mscf of natural gas. Louisiana allows 1.0 mmscf releases without approval or notification. If quantities are greater than 1.0 mmscf, contact your Environmental Specialist."
	2.5.3	Added "Offshore Releases not involving a sheen – Your area ES."
04/18/04	<p>2.3.1.3 – 2.3.1.7 and 2.4.2.5 – 2.4.2.9;</p> <p>4.0 – Definitions; and 2.4.4</p> <p>Document Header</p> <p>General</p>	<p>Added reporting requirements from 49 CFR 191, 192 &amp; 195;</p> <p>Added 4.6, 4.7 and 4.8; Changed "Title E" to "Tidally";</p> <p>Established link to WES-35 – Release Report Form;</p> <p>Changed "Energy Services" to "System Integrity Plan," changed revision number from 5 to 6 and changed effective date to 04/19/04; and</p> <p>Made miscellaneous obvious corrections.</p>
09/15/04	Entire Document	<p>Reordered and rewritten</p> <p>Added Plans Required of Pipelines/Facilities</p> <p>Clarified that 3E needs to be called as soon as possible and corrections made later.</p>

**RELEASE/SPILL REPORTING**

**MATERIAL SAFETY DATA SHEETS**

**CHEMICAL EXPOSURES/POISONINGS**

**Dial**

**24HRS/DAY - 7DAYS/WEEK**

**1-888-677-2370**

**Info you should have when calling:**

- **Time of Release/Spill**
- **Location of the Release**
- **Asset where Release Occurred**
- **Amount Released**
- **Name of Chemical or Product Released**



**3E COMPANY**

**1905 Aston Avenue, Carlsbad, CA 92008**

**Telephone: 760-602-8700**

**Fax: 760-602-8888**

# Release/Spill Report Form

Month	<input type="text"/>	Day	<input type="text"/>	Year	<input type="text"/>
Release Verification Time:		<input type="text"/>		Release Stop Time: <input type="text"/>	
Region	<input type="text"/>	District	<input type="text"/>	Area <input type="text"/>	
Location Name <input type="text"/>		Location Identifier <input type="text"/>			
Mainline Name <input type="text"/>		Mainline Identifier <input type="text"/>			
Area Manager <input type="text"/>		Company Asset <input type="text"/>		State <input type="text"/>	
Address <input type="text"/>		County	<input type="text"/>	Zip Code <input type="text"/>	
Release Discovered by: <input type="text"/>		Time <input type="text"/>			
Release Reported by: <input type="text"/>		Time <input type="text"/>			
Section	<input type="text"/>	Township	<input type="text"/>	Range	<input type="text"/>
				Milepost	<input type="text"/>
				Tract #	<input type="text"/>
Offshore	<input type="text"/>	Latitude	<input type="text"/>	Longitude <input type="text"/>	
Release Reportable?	<input type="text"/>	Waterway Affected?	<input type="text"/>	Name <input type="text"/>	

Report	Date	Number	Time	Name	Title	City	State
NRCC <input type="checkbox"/>							
SERC <input type="checkbox"/>							
LEPC <input type="checkbox"/>							
TRRC <input type="checkbox"/>							
EPA <input type="checkbox"/>							
Other <input type="checkbox"/>							

Product Released:	<input type="text"/>	Total BBL's Released	<input type="text"/>
Cause of Release:	<input type="text"/>	BBL's Recovered Wat	<input type="text"/>
Released To:	<input type="text"/>	BBL's Recovered Soil	<input type="text"/>
Other:	<input type="text"/>	Total BBL's Recovered	<input type="text"/>
		BBL's Not Recovered	<input type="text"/>
Remarks: <input type="text"/>			
Origin Of Release: <input type="text"/>			

Temperature	<input type="text"/>	Relative Humidity	<input type="text"/>	Precipitation	<input type="text"/>
Cloud Cover	<input type="text"/>	Wind Speed	<input type="text"/>	Wind Direction	<input type="text"/>
Injury	<input type="text"/>	Death	<input type="text"/>	Fire	<input type="text"/>
				Explosion	<input type="text"/>
Unconsciousness	<input type="text"/>	Hospitalization	<input type="text"/>		
Loss/Damage Estimate <input type="text"/>					
Incident Investigator: <input type="text"/>					
Environmental Contact for this Release: <input type="text"/>					
Safety Contact for this Release: <input type="text"/>					
Compliance Administrator for this area: <input type="text"/>					
Form completed by: <input type="text"/>					
Completion Date: <input type="text"/>					
Form was e-mailed to Williams on: <input type="text"/>					

**Appendix B**  
**NMOCD Notification and Corrective Action**

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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

**OPERATOR**

☐ Initial Report ☐ Final Report

Name of Company	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.
---------------	---------------	-----------

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
-------------	---------	----------	-------	---------------	------------------	---------------	----------------	--------

Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

**NATURE OF RELEASE**

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

Describe Area Affected and Cleanup Action Taken.\*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:		<b>OIL CONSERVATION DIVISION</b>	
		Approved by District Supervisor:	
Printed Name:		Approval Date:	Expiration Date:
Title:		Conditions of Approval:	
E-mail Address:		Attached <input type="checkbox"/>	
Date:	Phone:		

\* Attach Additional Sheets If Necessary

**Appendix C**  
**Public Notice**



## PUBLIC NOTICE

### Notice of Discharge Plan Renewal Application

#### Carracas CDP Compressor Station

Pursuant to the requirements of the New Mexico Water Quality Control Commission Regulation 20 NMAC 2.6.2 – GROUND AND SURFACE WATER PROTECTION, Williams Field Services Company of 188 County Road 4900, Bloomfield, NM 87413, hereby announces intent to apply to the New Mexico Oil Conservation Division to renew the Discharge Plan for the Carracas CDP Compressor Station. Williams expects to submit the permit application to the Oil Conservation Division in February 2006.

The facility, located in Section 34, Township 32 North, Range 5 West, Rio Arriba County, New Mexico, approximately 36.4 miles east of Aztec, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be in the range of 200 to 500 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

Comments or inquiries regarding this permit or the permitting process may be directed to:

Director of the Oil Conservation Division  
1220 South Saint Francis Dr.  
Santa Fe NM 87505  
(505) 827-1464

Please refer to the company name and site name, as used in this notice, or send a copy of this notice when making inquiries, since the Department might not have received the application at the time of this notice.



Four Corners Area  
Environmental Department  
#188 County Road 4900  
Bloomfield, N.M. 87413  
Phone: (505) 632-4625  
Fax: (505) 632-4781

January 17, 2006

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

U.S. Forest Service  
644 E. Broadway  
Bloomfield, New Mexico 87413

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Carracas CDP Compressor Station (GW-112). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during February 2006.

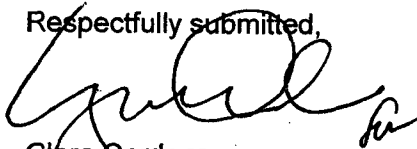
The facility, located in Section 34, Township 32 North, Range 5 West, Rio Arriba County, New Mexico, approximately 36.4 miles north of Aztec, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be in the range of 200-500 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

Comments or inquiries regarding this permit or the permitting process may be directed to:

Director of the Oil Conservation Division  
1220 South Saint Francis Dr.  
Santa Fe NM 87505

Respectfully submitted,



Clara Cardoza  
Environmental Compliance Administrator

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City, State, ZIP+4 Bloomfield, NM 87413		

PS Form 3800, June 2002 See Reverse for Instructions