GW - 122

PERMITS, RENEWALS, & MODS Application

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

John H. Bemis Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey Division Director Oil Conservation Division



FEBRUARY 21, 2012

Mr. Danell Zawaski Williams Four Corners 188 County Road 4900 Bloomfield, New Mexico 87413

Dear Mr. Zawaski:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit", the Oil Conservation Division (OCD) has determined that the following facilities with a soon to expire permit are not required to operate under a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit for GW-108 (SJ 30-5 #1 CDP CS), GW-111 (SJ 32-8 # 2 CS), GW-116 (32-8 3 CDP CS), GW-117 (32-7 1 CDP CS), GW-118 (31-6 1 CDP CS), GW-120 (Pipkin CS), GW-121 (SJ 29-6 # 2 CDP CS), GW-122 (SJ 29-6 # 4 CDP CS), GW-248 (Trunk A CS), GW-249 (Trunk B CS), GW-250 (Coyote Springs CS), GW-256 (Lateral N-30 CS (Koch-Gardner)), GW-257 (Trunk C CS), and GW-274 (Pritchard Straddle CS) will be allowed to expire and you are not required to proceed with the renewal of these expired WQCC Discharge Permits. OCD will close these discharge permits in its database.

Because this WQCC Discharge Permit will now longer be in effect, you may be required to obtain separate OCD permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required. Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit.

Mr. Danell Zawaski Page 2

If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

9 < Jami Bailey

Director

JB/ll

Mr David Bays GW-122 November 26, 2007 Page 2 of 7

ATTACHMENT TO THE DISCHARGE PERMIT WILLIAMS FOUR CORNERS, LLC, 29-6 # 4 CDP COMPRESSOR STATION (GW-122) DISCHARGE PERMIT APPROVAL CONDITIONS NOVEMBER 26, 2007

Please remit a check for \$1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund C/o: Oil Conservation Division 1220 S. Saint Francis Drive Santa Fe, New Mexico 87505

1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. However, the owner/operator still owes the required \$1700.00 renewal permit fee for a gas compressor station greater than 1001 horsepower.

2. Permit Expiration, Renewal Conditions and Penalties: Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. The permit will expire on July 29, 2012 and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, 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. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.*

3. Permit Terms and Conditions: Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its March 9, 2007 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval. Mr David Bays GW-122 November 26, 2007 Page 3 of 7

5. Modifications: WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. Waste Disposal and Storage: The owner/operator shall dispose of all wastes at an OCDapproved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

Mr David Bays GW-122 November 26, 2007 Page 4 of 7

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD. Mr David Bays GW-122 November 26, 2007 Page 5 of 7

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that 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 (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. <u>An unauthorized discharge is a violation of this permit.</u>

Mr David Bays GW-122 November 26, 2007 Page 6 of 7

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19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: <u>N/A</u>

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee. Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: Williams Four Corners, LLC, (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Mr David Bays GW-122 November 26, 2007 Page 7 of 7

<u>Conditions accepted by</u>: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

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Williams Four Corners, LLC
Company Name-print name above
David Bays
Company Representative- print name
Daniel Bayn
Company Representative ⁹ signature
Title Sr. Environmental Specialist
Date: December 12, 2007

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

) (
I hereby acknowledge receipt of check No dateddated
or cash received on in the amount of \$
from Willings Four Corners
for <u>Gw</u> -122
Submitted by: LAWRENCE FORAZIO Date: 12/14/E7
Submitted to ASD by: LAWRENCE FORE, 5 Date: 12/14/07
Received in ASD by: Date:
Filing Fee New Facility Renewal
Modification Other
Organization Code <u>521.07</u> Applicable FY <u>2004</u>
To be deposited in the Water Quality Management Fund.
Full Payment or Annual Increment



Environmental Affairs 188 CR 4900 Bloomfield, NM 87413 505/632-4625 505/632-4781 Fax

March 9, 2007

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Mr. Wayne Price New Mexico Oil Conservation Division Water Quality Management Fund 1220 S St. Francis Dr. Santa Fe NM 87505

Re: Discharge Plan Application and Filing Fee for 29-6#4 – GW-122

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application and check number 4027022297 for \$100.00 to cover the filling fee for the Williams Field Services (WFS) Culpepper Compressor Station.

Williams Field Services appreciates your assistance in handling this application and fees. If you have any questions or require additional information, please contact me at 505/632/4625.

Thank you,

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bricasanderal.

Monica Sandoval Environmental Compliance

Xc: Brandon Powell, Aztec, OCD Dist III

Oil Conservation Division

1220 South St. Francis Dr.

Santa Fe, NM 87505

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 OCD Guidelines for assistance in completing the application)

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					lenewal		Modificatio	n	
1.	Туре:	Compressor	Station (29-	6#4 Cent	ral Delivery I	Point, GW-12	22)		
2.	Operator:	Williams Fo	ur Corners, l	LLC					
	Address:	188 CR 4900	0, Bloomfiel	d, NM 87	7413				
	Contact Person:	David Bays				Phone:	(505) 634-	4951	
3.	Location:	SE/4	<u>SE/4</u> S	ection	19	Township	29 North	Range	6 West
4.	Attach the name,	telephone nurr	ber and add	ress of th	e landowner	of the facility	v site.		
5.	Attach the descrip facility.	otion of the fac	ility with a d	liagram i	ndicating loc	ation of fence	es, pits, dike	s and tanks	s on the
6.	Attach a descripti	on of all mater	rials stored o	r used at	the facility.				
7.	Attach a descripti waste water must	on of present s be included.	sources of ef	fluent and	d waste solid	s. Average d	aily quality a	and daily v	olume of
8.	Attach a descripti	on of current l	iquid waste	and solid	waste collect	tion/treatmen	t/disposal sy	stems.	
9.	Attach a descripti	on of proposed	d modificatio	ons to exi	sting collection	on/treatment/	disposal sys	tems.	
10.	Attach a routine i	nspection and	maintenance	plan to e	ensure permit	compliance.			
11.	Attach a continge	ncy plan for re	porting and	clean-up	of spills or re	eleases.			
12.	Attach geological included.	/hydrological	information	for the fa	cility. Depth	to and quali	ty of ground	water mus	t be
13.	Attach a facility c rules, regulations	losure plan, ar , and/or orders	nd other info	rmation a	is is necessary	y to demonst	rate complia	nce with ar	ny other
14.	CERTIFICATIO best of my knowl	N I hereby cert edge and belie	ify that the i f.	nformatio	on submitted	with this app	lication is tru	ue and corr	ect to the
NAM	1E: Da	vid Bays			Title:	Sr. Enviror	imental Spec	ialist	
Signa	ature:	Chuid	Bay	• ನೆ.ಕಿ. ಇಂ	Date:	March 5, 2	007	,	

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



WILLIAMS FOUR CORNERS, LLC 29-6#4 CENTRAL DELIVERY POINT DISCHARGE PLAN GW-122 RENEWAL

Prepared for:

New Mexico Oil Conservation Division Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413

March 2007

Item I

Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant (CO_2 removal) and compressor station include the total combined site rated horsepower.

The 29-6#4 Central Delivery Point is a compressor station owned and operated by Williams Four Corners, LLC (Williams). The site will include the following equipment:

The site is permitted for ten Waukesha 7042GL Reciprocating Compressor Engines (siterated compressor horsepower is 1085 hp or less) and four glycol dehydrators; however only four engines and four dehydrators are currently installed at the site. Compressors and dehydrators may be installed or removed to meet demand. In addition, there are various storage tanks, support structures and ancillary equipment.

Item 2

Name of operator or legally responsible party and local representative.

Legally Responsible Party/ Operator	Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 632-4600/4634 (800)-645-7400 (24 hour emergency notification)
Local Representative	David Bays Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 634-4951

Item 3

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

Rio Arriba County, New Mexico Township 29 North, Range 6 West, Section 19 The topographic map is attached as Figure 1.

Item 4

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

Williams is leasing the subject property from the following joint owners:

William L. and Eva Dawson P.O. Box 719 Pagosa Springs, CO 81147 Richard Hodgson Darlene Hodgson 9355 Hwy 64 Blanco, NM 87412

Item 5

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

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

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 are maintained in WFS's corporate office and are 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 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 to this item. Additionally, 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.

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.

Item 11

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

WFS will handle all spills and leaks immediately as required by company procedures and will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and WQCC Section 1203.

Item 12

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

A current well search was performed for this renewal application. Well 03393 is located approximately one-half mile from the site and was drilled to a depth of 210 feet. However, there is no other information provided for this well. Therefore, there is no new information to report for this item. See information on-file at OCD.

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 item. See information on-file at OCD.





TABLE 1 TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS 29-6#4 CENTRAL DELIVERY POINT

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Ned Oil	Above Ground Storage Tank	6930 gal	Berm	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Condensate/Produced Water	Above Ground Storage Tank	300 PDI	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 NMOCD-approved facility.
Wash-down Water/Waste Water	Above Ground Storage Tank	6930 gal	Berm	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered.
Used Oit Fitters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	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.
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 an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. 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 to a Williams or contractor facility in drum or other container	Non-exempt	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.
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.
Antiireeze	Above Ground Storage Tank	500 gal	Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	100 gal* 50 gal*	Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	4200 gal 500 gal*	Berm Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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"Number of tanks installed dependent on number of engines and dehydrators installed on site. Engines and dehydrators are installed or removed to meet demand.

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TABLE 2SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS29-6#4 CENTRAL DELIVERY POINT

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PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Condensate/Produced Water	Inlet Scrubber, Gas Inlet Separator, Dehydratrors	100-6000 bbl/year	No Additives
Wash Down Water/Waste Water	Compresor and Dehy Skids	500-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil and glycol
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	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



Four Comers Area Environmentel Depertment arte8 County Road 4900 Bicomhuld, N.M. 87413 Phone: (505) 632-4826 Fax: (506) 632-4/81

February 20, 2007

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

William L. and Eva Dawson P.O. Box 719 Pagosa Springs, CO 81147

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted 29-6#4 Central Delivery Point (GW-122). 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 March 2007.

The facility, located in Section 19, Township 29 North, Range 6 West, Rio Arriba County, New Mexico, approximately 27 miles east of Bloomfield, 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 <u>does not</u> 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 100 to 200 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:

1220 South Saint Francis Dr. Santa Fe NM 87505 Respectfully submitted.

Director of the Oil Conservation Division

Clára Cardoza Environmental Compliance Administrator

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2005	Street Lot No. x PO Box No. City Street VAL PARE OF PARE OF P	an Bo	- Euc x 719 2×1-95	CO 81147



Four Comers Area Environmental Detractment #138 County Road 4500 Blocmfeld, N.M. 37413 Phone: (505) 332-4781 Fux. (505) 332-4781

February 20, 2007

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Richard Hodgson Darlene Hodgson 9355 Hwy 64 Blanco, NM 87412

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners. LLC is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted 29-6#4 Central Delivery Point (GW-122). 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 March 2007.

The facility, located in Section 19, Township 29 North, Range 6 West, Rio Arriba County, New Mexico, approximately 27 miles east of Bloomfield, 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 <u>does not</u> 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 100 to 200 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	941 9657	CERTIFIED (Domestic Met) C For dethory Informe SLANDO WH 370	D M/A ab A No atton via 412	6 m Ilen Ri Insucano Iour vector	CELT I	Provided) Ps.come
Respectfully submitted, Clara Cardoza Environmental Compliance Administrator	7006 0100 0004 7	Postage Contribut Fee Protum Providint Fee Endorsement Required Hostacted Detivery Free (Endorsement Required) Det Postage & Foese Stort Fo Ricke Stort Fo Ricke Stort Row Of Stort Row Of	\$ \$ and / \$55	\$0.39 \$2.40 \$1.35 \$0.00 \$4.54 Danler Hury G	0012 1012 02/20120 4 Hody 5741	250 25-6-4 25-6-4 2
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ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-122 WILLIAMS FIELD SERVICES COMPANY 29-6 #4 CDP COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (July 10, 2002)

- 1. <u>Payment of Discharge Plan Fees:</u> The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for compressor stations with greater than 1001 horsepower rating equal to \$1,700.00. 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. <u>Williams Field Services Company Commitments:</u> Williams Field Services Company will abide by all commitments submitted in the discharge plan renewal application dated March 22, 2002 and these conditions for approval.
- 3. <u>Waste Disposal</u>: 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. <u>Drum Storage:</u> 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks</u>: 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. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

- 9. <u>Below Grade Tanks/Sumps:</u> 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. <u>Underground Process/Wastewater Lines:</u> 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. <u>Class V Wells</u>: 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. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected by a Williams Field Services Company's representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained for a period of five years.
- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> 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. <u>Storm Water Plan:</u> Williams Field Services Company, Inc. shall maintain storm water runoff controls. As a result of Williams Field Services Company, Inc.'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 Company, Inc. shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Williams Field Services Company shall also take immediate corrective actions pursuant to Item 12 of these conditions.

- 16. <u>Closure:</u> The OCD will be notified when operations of the 29-6 #4 CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the 29-6 #4 CDP Compressor Station 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. <u>Certification:</u> Williams Field Services Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services Company 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 COMPANY.

by C

Title De Environ MELTAR SPECIALIST

District 1 1625 N. French Dr., Hobbs, NM 88240 District II 811 South First, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 2040 South Pacheco, Santa Fe, NM 87505	State of New Mexico Energy Minerals and Natural Resources Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505	Revised March 17, 1999 Submit Original Plus 1 Copy to Santa Fe I Copy to Appropriate District Office
GAS PLANTS. REFINERIES (Refer to the OCE	5, COMPRESSOR, AND CRUDE OIL D Guidelines for assistance in completing the application	PUMP STATIONS
🗌 New	Renewal Modification	
1. Type: Compressor Station (29-6 #4 C	CDP Compressor Station)	
2. Operator: Williams Field Services Co	ompany	
Address: 188 CR 4900, Bloomfield,	New Mexico 87413	
Contact Person: Mark J. Bareta	Phone: (505) 632	2-4634
3. Location: SE/4 Submit la	SE/4 Section 19 Township 29 North arge scale topographic map showing exact location.	Range 6 West
4. Attach the name, telephone number a	nd address of the landowner of the facility site.	
5. Attach the description of the facility	with a diagram indicating location of fences, pits, dike	es and tanks on the facility.
6. Attach a description of all materials s	tored or used at the facility.	
7. Attach a description of present source must be included.	es of effluent and waste solids. Average quality and d	aily volume of waste water
8. Attach a description of current liquid	and solid waste collection/treatment/disposal procedu	ires.
9. Attach a description of proposed mod	lifications to existing collection/treatment/disposal sys	stems.
10. Attach a routine inspection and main	tenance plan to ensure permit compliance.	
11. Attach a contingency plan for report	ing and clean-up of spills or releases.	
12. Attach geological/hydrological infor	mation for the facility. Depth to and quality of ground	d water must be included.
13. Attach a facility closure plan, and ot rules, regulations and/or orders.	her information as is necessary to demonstrate compli	ance with any other OCD
14. CERTIFICATION		
I hereby certify that the information and belief.	submitted with this application is true and correct to t	he best of my knowledge
Name: Mark J. Bareta Signature:	Title: Senior Environme Date: $3/22$	ntal Specialist

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DISCHARGE PLAN RENEWAL

29-6 #4 CDP COMPRESSOR STATION (GW-122)

Williams Field Services Company

March 2002

I. <u>TYPE OF OPERATION</u>

The 29-6 #4 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) Milagro Plant.

II. LEGALLY RESPONSIBLE PARTY

Williams Field Services 188 CR 4900 Bloomfield, NM 87413 (505) 632-4634

Contact Person:

Mark J. Bareta, Senior Environmental Specialist Phone and Address, Same as Above

III. LOCATION OF FACILITY

The 29-6 #4 CDP Compressor Station is located in Section 19, Township 29 North, Range 6 West, in Rio Arriba County, New Mexico, approximately 27 miles east of Bloomfield, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangles: Four Mile Canyon and Delgadita Mesa, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

IV. <u>LANDOWNER</u>

Williams Field Services is leasing the subject property from:

William L. Dawson and Eva P.O. Box 719 Pagosa Springs, CO 81147

V. 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 nine 1,377 hp engines. Only three units are currently installed at the site. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

VI. SOURCE, QUANTITY, AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

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

<u>TABLE 1</u> SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS 29-6 #4 CDP COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1000–2000 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Natural Gas Condensate	Scrubber, Gas Inlet Separator	2000-4000 bbl/year	No additives
Waste Water	Drawn of Natural Gas Condensate Tank	100-500 bbl/year	No additives
Wash-down Water	Compressor Skid	500-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Used Process Filters	Air, Inlet and Fuel Gas	75-100/year	No additives
Empty Drums / Containers	Liquid Containers	10-20/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

VII. <u>TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND</u> 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. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant. 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.

 TABLE 2

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

 29-6 #4 CDP COMPRESSOR STATION

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
		(approximate)			
Used Oil	Above Ground Storage Tank	165 bbl	Berm	Non-exempt	May be hauled to a WFS or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS 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.
Natural Gas Condensate	Above Ground Storage Tank	300 bbl	Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Wash-down Water	Above Ground Storage Tank	165 bbl	Berm	Non-Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS 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.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Spill Residue (i.e., soil, gravel)	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 WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS 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.
Glycol	Above Ground Storage Tank	 (1) 500 gallons (4) 100 gallons (4) 50 gallons 	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Solvent	Above Ground Storage Tank	500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above Ground Storage Tank	(3) 500 gallons 100 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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VIII. <u>STORM WATER PLAN</u>

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.

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 berns, curbs, or emergency response actions, could flow overland to open off-site drainage 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.

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.

IX. INSPECTION, MAINTENANCE AND REPORTING

WFS's personnel will operate and maintain the compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through WFS Gas Dispatch. The facility will be visited several times per week at a minimum, and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. 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 WFS spill notification service. The service immediately notifies the WFS Environmental Department and all appropriate agencies.

X. SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Spill containment berms around above ground storage tanks will be designed to contain 1-1/3 times the volume of the tank and will be equipped with an impermeable liner. The below-grade tanks will be constructed with a means of leak detection, and will either be double-bottomed tanks or a tank set on an impermeable pad.

WFS corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided 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).

XI. <u>SITE CHARACTERISTICS</u>

The 29-6 #4 CDP Compressor Station is located approximately 27 miles east of Bloomfield, New Mexico. The site elevation is approximately 6,280 feet above mean sea level. The natural ground surface topography slopes downward toward the north. The maximum relief over the site is approximately 10 feet. Intermittent flow from the site will follow the unnamed drainage approximately 800 feet north to Gobernador Canyon Wash. Gobernador Canyon Wash drains into the San Juan River, approximately 13.4 miles west of the site. The San Juan River, at approximately 5,650 feet in elevation, is the nearest down-gradient perennial source of surface water to the site.

A review of the available hydrologic data^{1,2} for this area revealed that there are no registered water wells within a $\frac{1}{4}$ -mile radius of 29-6 #4 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 100 to 200 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

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 no flood hazards. Vegetation in the area consists predominantly of sagebrush and native grasses

Flood Protection: Surface water runoff from the area surrounding the site will be diverted around the facility into the natural drainage path.

References

¹Stone, 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.

²Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2000.

XII. FACILITY CLOSURE PLAN

All reasonable and necessary measures will be taken to prevent the exceedence of WCQQ Section 3103 water quality standards should WFS choose to permanently close the facility. WFS 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.

FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLAN



Source: USGS Fourmile Canyon and Delgadita Mesa, NM Quadrangles

Scale: 1" = 2,000'



Figure 1 Site Vicinity / Topographic Map 29-6 #4 CDP Compressor Station

Section 19, Township 29N Range 6W Rio Arriba County, New Mexico

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS



1998 15: 34 16: 20 Aug Thu S: \wfsds\PM_EI\29-6-4\E0D\00080102

OPERATIONS				
 Hanual 29-6 #4 C.D.P. COM	PRESSOR	SSOR STATION		
Section SPILL PREVENTION CONTROL	Tob 13	Document No. 42.13.001		
Effective Date 01/26/98	issue No. 02	Page No.		

6 400-BBL CONDENSATE/WASTE WATER TANK (TEMPORARY)

-+		DRAFTING	BY	DATE	STATE NEV MEXIC	0	WILLIAMS FIELD SERVICES		
		DRAWN BY	2.3E	01/23/99	COUNTY RID ARRID	<u>`</u>	ONE OF THE VELLIAMS CONTINUE		
-+		CHECKED BY	RR		29-6 #4 COMPRESSOR STATION SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN PLOT PLAN				
		APPROVED BY							
RR		ENGINEER	BY	DATE					
CHK.	APP.	DESIGNED BY			SCALE: 1" = 30"			PECT NEV	
	_	PROJ. APPROVED			V.D. ND	DWG NO.	29-6-4-1-P8	Pr 02	

APPENDIX A

SPILL CONTROL PROCEDURES

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APPENDIX B

NMOCD NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

I



FIELD SERVICES

July 22, 1997

JUL 2 4 1997

Mr. William LeMay New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal Fee for 29-6 No. 4 CDP (GW-122); Rio Arriba County

Dear Mr. LeMay:

Enclosed please find a check for \$690 to cover the discharge plan renewal fee for Williams Field Services' 29-6 No.4 CDP located in Rio Arriba County, New Mexico. Also enclosed, please find one signed copy of the conditions of approval for your records.

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

Sincerely,)ell

Ingrid A. Deklau Sr. Environmental Specialist

enclosure

cc: Denny Foust, OCD District III Office (letter and enclosure)

ATTACHMENT TO THE DISCHARGE PLAN GW-122 RENEWAL WILLIAMS FIELD SERVICES 29-6#4 CDP DISCHARGE PLAN APPROVAL CONDITIONS (July 3, 1997)

- 1. <u>Payment of Discharge Plan Fees:</u> The \$690 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. <u>Williams Commitments:</u> Williams will abide by all commitments submitted in the discharge plan application dated March 19, 1997.
- 3. <u>Waste Disposal</u>: All wastes shall 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 by characteristics 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> All above ground tanks which contain fluids other than fresh water must be berned 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 within the berm.
- 7. <u>Above Ground Saddle Tanks</u>: 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. <u>Labeling:</u> All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

9. <u>Below Grade Tanks/Sumps:</u> 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. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees 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. <u>Class V Wells</u>: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

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

13. <u>Spill Reporting:</u> All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.

14. <u>Transfer of Discharge Plan:</u> 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. <u>Closure:</u> 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.

Page 2 of 3

16. <u>Certification:</u> Williams, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams 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 bν Title Sr. Bhot & Spec

Page 3 of 3

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



July 29, 1992

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

BRUCE KING GOVERNOR

> CERTIFIED MAIL RETURN RECEIPT NO. P-667-242-133

Mr. Robert Peacock Williams Field Services P.O. Box 58900, M.S. 10368 Salt Lake City, Utah 84158-0900

RE: Discharge Plan GW-122 San Juan 29-6 No. 4 C.D.P. Rio Arriba County, New Mexico

Dear Mr. Peacock:

The groundwater discharge plan GW-121 for the Williams Field Services San Juan 29-6 No. 4 CDP Compressor Station located in the SE/4 SE/4, Section 19, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated May 15, 1992.

The discharge plan was submitted pursuant to Section 3-106 of the Water Quality Control Commission Regulations. It is approved pursuant to section 3-109.A. Please note Section 3-109.F., which provides for possible future amendment of the plan. Please be advised that 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 Mr. Robert Peacock July 29, 1992 Page -2-

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 years. This approval will expire July 29, 1997 and you should submit an application for renewal in ample time before that date.

The discharge plan application for the Williams Field Services San Juan 29-6 No 4 C.D.P Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteenhundred and eighty (1380) dollars for compressor stations with over 3000 Horsepower.

The OCD has received your \$50 filing fee. The flat fee for an approved discharge plan 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.

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

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. h. - " and William J. LeMay

William J. LeMay Director

WJL/rca

xc: OCD Aztec Office

ATTACHMENT TO DISCHARGE PLAN GW-122 APPROVAL WILLIAMS FIELD SERVICES SAN JUAN 29-6 NO 4 CDP COMPRESSOR STATION DISCHARGE PLAN REQUIREMENTS (July 29, 1992)

- 1. <u>Payment of Discharge Plan Fees:</u> The \$1380 flat fee (either total payment or installment) will be paid upon receipt of this approval.
- 2. <u>Drum Storage:</u> All drums will be stored on pad and curb type containment.
- 3. <u>Sump Inspection:</u> Any new sumps or below-grade tanks will be approved by the OCD prior to installation and will incorporate leak detection in their designs.