GW - 182

PERMITS, RENEWALS, & MODS Application

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No: _____ dated 1/14/09

or cash received on _____ in the amount of $ 400 00

from William Four Corners

for GW-182

Submitted by: Lawrence Romero Date: 1/26/09

Submitted to ASD by: Lawrence Romero Date: 1/26/09

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal ✓

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

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 flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. *This station is currently non operational therefore the OCD will only request a facility fee of $400.00 for renewal.* Please submit this amount along with the signed permit. Checks should be made out to the New Mexico Water Quality Management Fund.

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 February 21, 2014** 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, NMSA 1978} 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 October 2008 discharge plan 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.

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 OCD-approved 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.

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.

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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 20.6.2.1203 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 performed an inspected this facility on November 19, 2008. David Bays and Brandon Powell were in attendance. All photographs referenced below are attachment to this permit. **This facility has not been operational for approximately 4 years and was not operational at the time of inspection**. The inspection concluded the following:

1. **Photo 1 – 3**: Two above ground storage tanks are unlined. The condensate tank is still operational. Williams shall line the tanks that are in use and holding fluids.
2. **Photo 4**: A staging area for contaminated soil is onsite. Waste shall not be onsite more than 180 days unless approved by the OCD. Being that this facility has been idle for greater than 180 days there should be no waste on site. Williams shall provide the approval to keep this waste on site or remove this waste immediately.
3. **No photo**: No compressors are onsite. Williams shall verify that all open ports draining from compressor skids or any secondary container are capped and not receiving any fluids. Williams shall verify that the below grade tank (waste water sump) is empty. Williams shall submit to the OCD all hydrostatic test results for underground lines onsite.

Williams Four Corners shall submit a report to the OCD on resolutions to these findings within **90 days, by April 6 2009** from this permit date.

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. ***An unauthorized discharge is a violation of this permit.***

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: This facility is not operational at the time of renewal. Williams Four Corners shall ensure that all aspects of this permit are applied to this facility at all times and inform the OCD when this facility is operational.

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 transferor 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: (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

Conditions accepted by: "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."

Williams Four Corners, LLC
Company Name-print name above

David Bays
Company Representative- print name

David Bays
Company Representative- Signature

Title Sr. Environmental Specialist

Date: 01-12-2009

OCD Inspection: Williams Four Corners, Navajo CS, GW - 182

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: David Bays

Date: 11.19.08 Time: 09:37 – 09:50

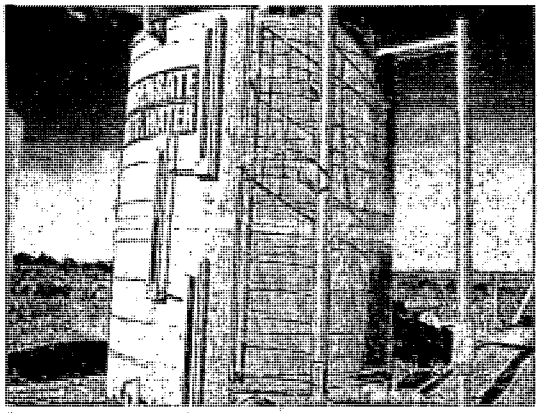

Photo 1: Condensate tank.

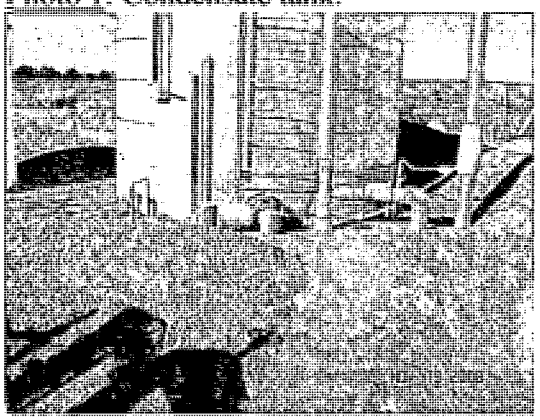

Photo 2: No liner underneath condensate tank.

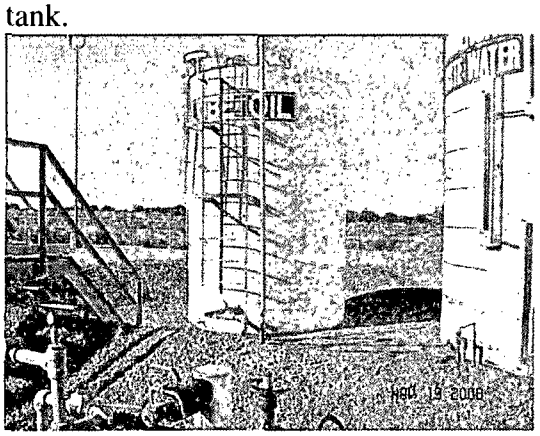

Photo 3: Non liner under lube oil tank.

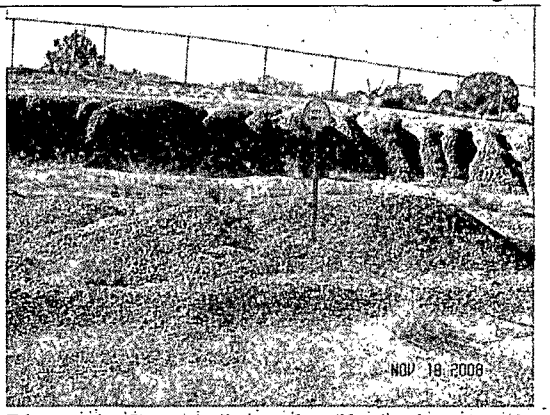

Photo 4: Contaminated soil staging area.

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

January 6, 2009

Mr. David Bays
Williams Four Corners
188 Road 4900
Bloomfield, N.M. 87413

Re: Discharge Permit Renewal
Navajo Compressor Station (GW-182)
Unit Letter "A" Section 2, Township 30 North, Range 8 West, NMPM,
San Juan County, New Mexico

Dear Mr. Bays:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **Williams Four Corners, LLC.,** (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

Attachments-1
xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

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 flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. *This station is currently non operational therefore the OCD will only request a facility fee of $400.00 for renewal.* Please submit this amount along with the signed permit. Checks should be made out to the New Mexico Water Quality Management Fund.

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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: (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

Conditions accepted by: "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."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

OCD Inspection: Williams Four Corners, Navajo CS, GW - 182

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: David Bays

Date: 11.19.08 Time: 09:37 – 09:50

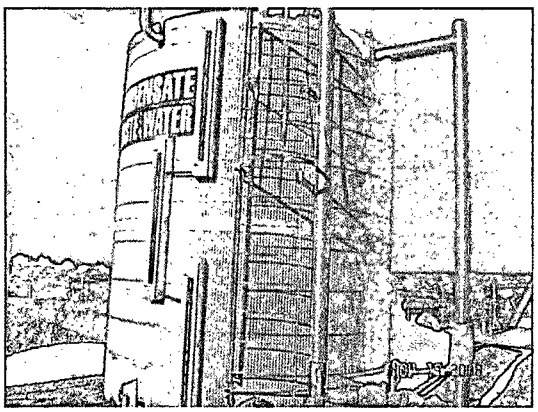


Photo 1: Condensate tank.

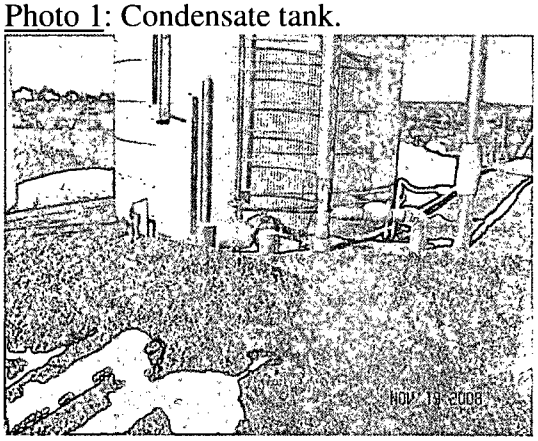


Photo 2: No liner underneath condensate tank.

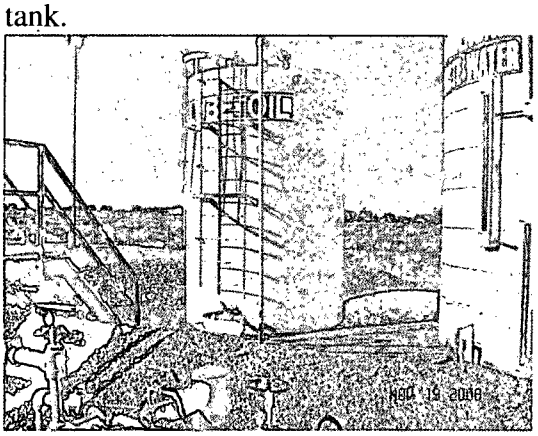


Photo 3: Non liner under lube oil tank.

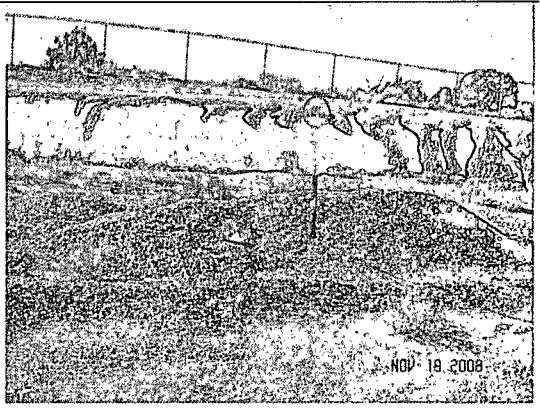


Photo 4: Contaminated soil staging area.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, October 31, 2008 3:04 PM
To: 'Bays, David'
Cc: 'Deklau, Ingrid'
Subject: GW-182, Navajo CS Admin Complete
Attachments: GW-182, Admin Complete Letter.pdf; GW-182 Draft Permit.pdf; GW-182 OCD PN.pdf

Mr. David Bays,

GW-182, Williams Four Corners Navajo Compressor Station has been determined to be Administratively Complete.

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 31, 2008

Dear Mr. Bays:

Re: Discharge Plan Renewal Permit GW-182
Williams Four Corners
Navajo Compressor Station
San Juan County, New Mexico

The New Mexico Oil Conservation Division (NMOCD) has received Williams Four Corners LLC's request and initial fee, dated October 20, 2008, to renew GW-182 for the Navajo Compressor Station located in the Unit letter "A" of Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

The New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC was met and demonstrated to the NMOCD. Once your notice has been published please submit your proof of publication affidavit to the Santa Fe OCD office. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Leonard Lowe
Environmental Engineer

LRL/lrl

xc: OCD District III Office, Aztec

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 31, 2008

Mr. David Bays
Williams Four Corners
188 Road 4900
Bloomfield, N.M. 87413

Re: **DRAFT** Discharge Permit Renewal
Navajo Compressor Station (GW-182)
Unit Letter "A" Section 2, Township 30 North, Range 8 West, NMPM,
San Juan County, New Mexico

Dear Mr. Bays:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **Williams Four Corners, LLC.,** (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

The final permit should be issued in approximately 45 days. If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

Attachments-1

xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

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 flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. The fee for a compressor station with a horsepower greater than 1001 is $1700.00. Please submit this amount along with the signed permit. Checks should be made out to the New Mexico Water Quality Management Fund.

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 February 21, 2014** 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, NMSA 1978} 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 October 2008 discharge plan 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.

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 OCD-approved 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.

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.

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 20.6.2.1203 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. ***An unauthorized discharge is a violation of this permit.***

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: N/A

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 transferor 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: (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

Conditions accepted by: "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."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-182) Mr. David Bays, Environmental Specialist, Williams Four Corners LLC, 188 CR 4900, Bloomfield, N.M. has submitted a renewal application for the previously approved discharge plan for their Navajo Compressor Station, located in unit letter "A" of Section 2, Township 30 North, Range 8 West, NMPM, San Juan County. The facility is located approximately 20 miles east of Aztec, N.M. The station provides metering and compression of natural gas for various producers in the area. Approximately 500 gallons of used oil, 300 barrels of condensate/produced water and 740 gallons of waste/wash water are generated and stored in onsite along with other related solid oil field waste. Fluids are not to be intentionally discharged to the ground. If accidental discharge occurs immediate recovery/reclamation shall be implemented. Fluids, other then clean water, including dry chemicals, shall be stored within secondary containment and properly bermed. Waste shall be properly maintained and manifested. A copy of the discharge permit once renewed shall be on location at all times and made familiar to all facility personal. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 100 - 400 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico

Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this **31st** day of October 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

Cirrus Consulting, LLC

October 29, 2008

Mr. Leonard Lowe
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Subject: Discharge Plan Renewal Applications
Williams Four Corners, LLC Navajo Compressor Station (GW-182)

Dear Mr. Lowe:

On behalf of Williams Four Corners, LLC, Cirrus Consulting, LLC submitted the Discharge Plan renewal application for the Navajo Compressor Station (GW-182) to you via email on October 20, 2008. A copy of the email was also forwarded to Brandon Powell, OCD District 3 today.

Enclosed please find a check for $100 to cover the filing fees for each of the three facilities.

If any additional information is needed, please contact me at the number below or Mr. David Bays of Williams Four Corners, LLC at (505) 634-4951.

Sincerely,

for Ingrid Deklau

Cirrus Consulting, LLC
1828 Harrison Ave.
Salt Lake City, Utah 84108

Tel: (801) 583-3107
ideklau@cirrusllc.com

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 10/29/08

or cash received on _____ in the amount of $ 100.00

from Williams Four Corners

for GW-182

Submitted by: Lawrence Romero Date: 11/3/08

Submitted to ASD by: Lawrence Romero Date: 11/5/08

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

Lowe, Leonard, EMNRD

From: Deklau, Ingrid [Ingrid.Deklau@Williams.com]
Sent: Monday, October 20, 2008 4:31 PM
To: Lowe, Leonard, EMNRD
Cc: Bays, David
Subject: Williams GW-182 OCD Renewal Application
Attachments: Navajo (GW-182) OCD Renewal application 10-20-2008.pdf

Leonard –
Please find attached, the Williams Navajo Compressor Station OCD Discharge Plan renewal application (GW-182).
Call if you have any questions.
The $100 filing fee will follow in the regular mail.
Thanks,
Ingrid
801-583-3107

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 OCD Guidelines for assistance in completing the application)

☐ New ☒ Renewal ☐ Modification

1. Type: Natural Gas Compressor Station (Navajo Compressor Station, GW-182)
2. Operator: Williams Four Corners, LLC

   Address: 188 CR 4900, Bloomfield, NM 87413

   Contact Person: David Bays Phone: (505) 634-4951
3. Location: NE/4 NE/4 Section 2 Township 30N Range 8W
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 daily quality and daily volume of waste water must be included.
8. Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.
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 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: Environmental Specialist

Signature: David Bays Date: October 20, 2008

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

Navajo Compressor Station

NMOCD Discharge Plan
GW-182 Renewal

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

November 2008

Item 1
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 Navajo Compressor Station is owned and operated by Williams Four Corners, LLC (Williams). The station was constructed in 1995 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams system. The site is permitted for two reciprocating compressor engines (site-rated at 1371 horsepower each) and three triethylene glycol dehydrators. However, the compressor engines and dehydrators located at the site have either been removed or shut-in and removed from service. All tanks located at the facility are empty, with the exception of the produced water tank, which is still receiving liquids as gas is still flowing through the facility. This renewal application is being submitted to allow for redevelopment of the site in the future. Any necessary modifications to this plan, including a description of equipment permitted for operation at the site, will be provided to NMOCD, as required, prior to startup of the facility.

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.

San Juan County, New Mexico
Township 30 North, Range 8 West, NE/4 NE/4 Section 2
The topographic map is attached as Figure 1.

Item 4
Attach the name, telephone number and address of the landowner of the facility site.

Bureau of Land Management
1235 N. La Plata Highway
Farmington, NM 87401
505-599-8900

Item 5
Attach a description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

With the exception of the 300 bbl produced water tank, compressor engines and tanks described in the previous OCD Discharge Plan for this site have been removed from the site or shut-in. The produced water tank is still receiving liquids as gas is still flowing through the facility. Updated information will be provided to NM OCD as required prior to startup of the facility.

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. Updated information will be provided to NMOCD as required prior to startup of the facility.

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

Item 7
Attach a description of present sources of effluent and waste solids. Average quality and daily volume of wastewater must be included.

The source, quantity, and quality of effluent and waste solids expected to be generated at the compressor station are summarized in Table 2. Updated information will be provided to NMOCD as required prior to startup of the facility.

Item 8
Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

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

Item 9
Attach a description of proposed modifications to existing collection/treatment/disposal systems.

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

Item 10
Attach a routine inspection and maintenance plan to ensure permit compliance.

The facility will be remotely monitored for equipment malfunctions through Gas Dispatch and visited regularly while not in service. Additionally, an operator will be on call 24 hours per day,

7 days per week, 52 weeks per year. See information on-file at OCD for discussion applicable during normal operations.

Item 11

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

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

Item 12

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

A current well search was performed using the New Mexico Office of the State Engineer's WATERS Database for this renewal application. There is no new information to report for this item. There are no water wells within a ¼-mile radius of Navajo Compressor Station. Information previously reported to OCD indicates estimated ground water depth at the site is 100 to 400 feet. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 200-2,000 mg/l. See additional information on-file at OCD.

References

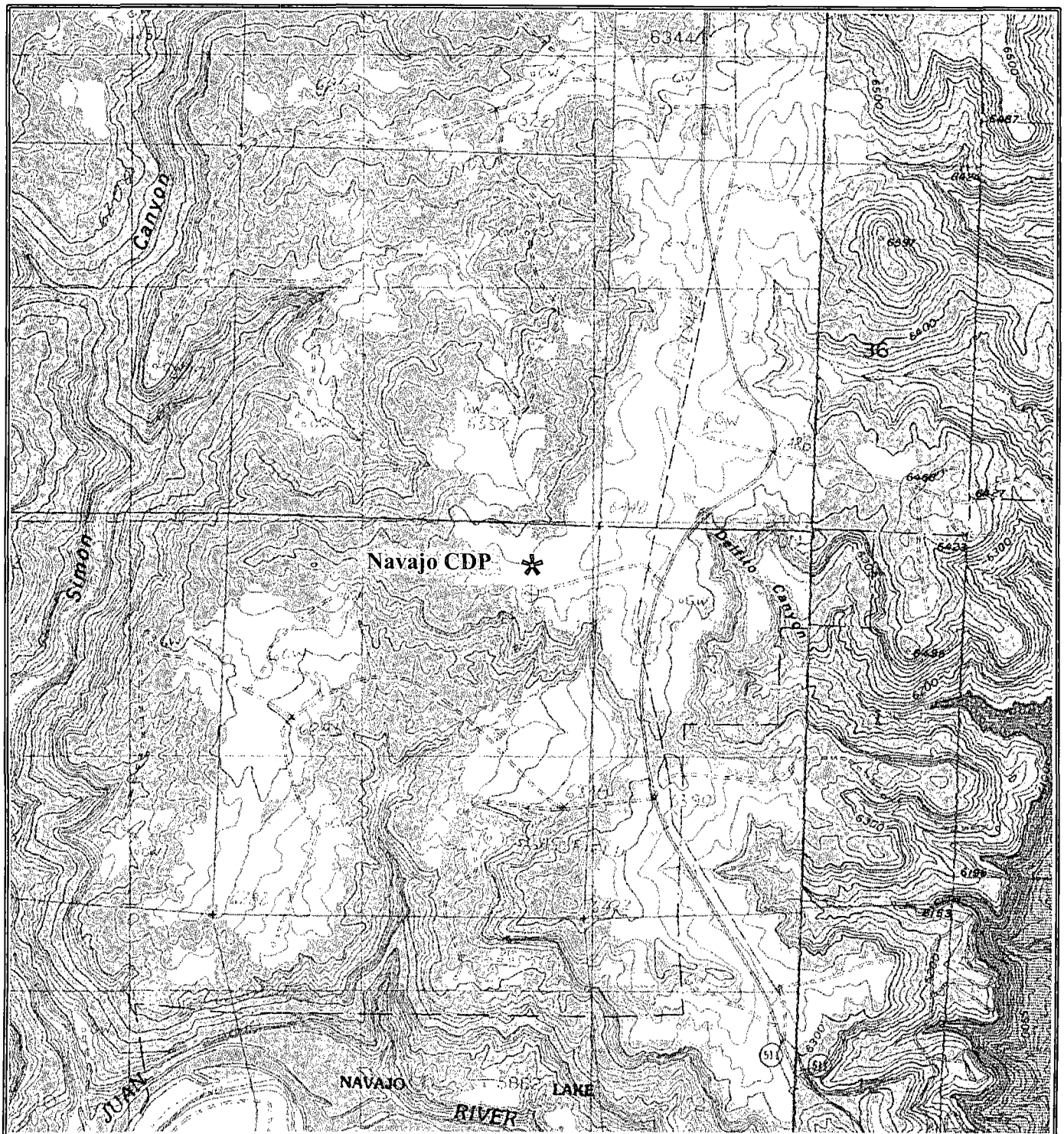
[1]Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

[2]Online Well Reports and Downloads, New Mexico Office of the State Engineer, search performed 4/2008.

Item 13

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

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



Source: USGS Archuleta and Navajo Dam, New Mexico Quadrangles

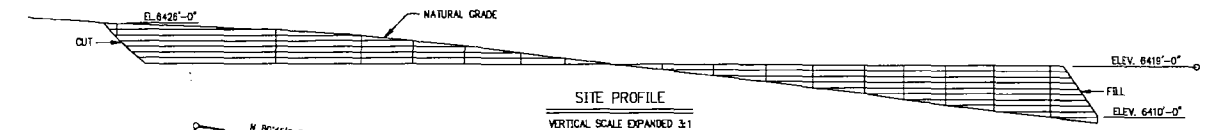
Williams

Figure 1 Site Vicinity / Topographic Map

Navajo CDP Compressor Station

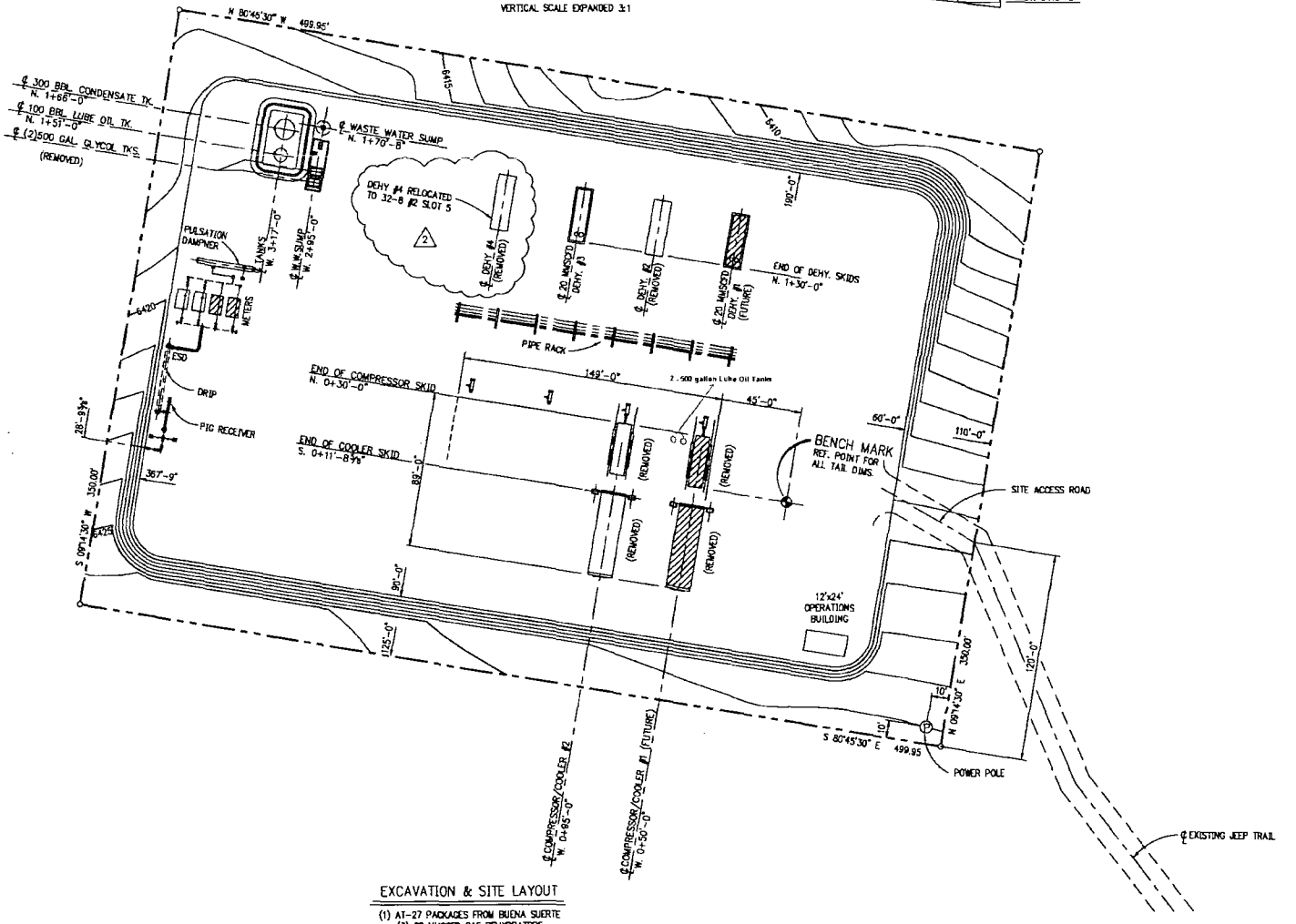
Section 2, Township 30N Range 8W

San Juan County, New Mexico



SITE PROFILE

VERTICAL SCALE EXPANDED 3:1



EXCAVATION & SITE LAYOUT

(1) AT-27 PACKAGES FROM BUENA SUERTE
(3) 20 MMSCFD GAS DEHYDRATORS

PRODUCTION OPERATORS INC.

NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
2	3/31/04	DDA	REMOVED DEHY #4		
1	1/21/03	AA	AS BUILT		
0	4/16/02	HPM	ISSUED FOR CONSTRUCTION		

REVISIONS

	BY	DATE
DRAFTING		
DRAWN	JER	01/08/03
CHECKED	JK	
APPROVED		
ENGINEERING	BY	DATE
C & S REVIEW		
PROJECT APPROVED		
PLOT DATE/TIME	3/31/2004 8:55 A.M.	

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

NAVAJO C.D.P.

EXCAVATION & SITE LAYOUT

SCALE: 1"=30'
W.O. # 11373

DWG. NO. NAV-1-M1

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	500 gal*	Concrete pad and wastewater system	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Natural Gas Condensate/ Produced Water	Above Ground Storage Tank	300 bbl	Berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Waste Water/ Wash Down Water	Below Grade Storage Tank	740 gal	Double-walled tank	Non-Exempt	Contractor may pump wash water back into truck after washing; water may be transported to any facility permitted by any state, federal, or tribal agency to receive industrial solid waste; or evaporation at Williams' facility may be considered. Any waste determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste.
Used Oil Filters and Oil Soaked Pads and Socks	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Used oil filters and oil soaked pads and socks will be recycled as required by OCD regulations.
Used Process Filters	Drum or other container	Varies	Transported in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Spill Residue (e.g., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non - exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol	Above Ground Storage Tank	2 @ 500 gal 100 gal*	Berm or Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	500 gal* 100 bbl	Concrete pad and wastewater system Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Natural Gas Condensate/ Produced Water	Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank	2000-8000 bbl/year	No Additives
Waste Water/ Wash Down Water	Compressor and Dehy Skids; Process Areas; Condensate Tank	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
Used Glycol/Antifreeze/ Methanol	Site and Field Dehydration/ Coolant	0-4000 bbl/yr	No additives
Used Solvent	Parts Cleaner; Pipeline Additive	0-500 gal/year	No additives
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	Charcoal, Activated Carbon, Molecular Sieve	50-500 cubic yd/yr	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol	75-500/year	No Additives
Empty Drums/Containers	Liquid Containers	0-80/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

See attached DRAFT Public Notice, to include the following:

- Newspaper notice published in Farmington Daily Times in English and Spanish
- Landowner notice to BLM

Williams

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

October 17, 2008

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Bureau of Land Management
1235 N. La Plata Highway
Farmington, NM 87401

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC submitted a Discharge Plan Renewal application to the Oil Conservation Division for the permitted Navajo Compressor Station (GW-182) in October 2008. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations.

The facility, located in the NE/4, NE/4 Section 2, Township 30 North, Range 8 West, San Juan County, New Mexico (BLM Grant NM99973), approximately 20 miles east of Aztec, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100–5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be in the range of 100-400 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:

Leonard Lowe
New Mexico Oil Conservation Division
1220 South Saint Francis Dr.
Santa Fe NM 87505
505-476-3492

Respectfully submitted,

David Bays
Sr. Environmental Specialist

PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in October 2008 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-182 for their Navajo Compressor Station located in the NE/4, NE/4 of Section 2 Township 30 North, Range 8 West in San Juan County, New Mexico. The facility, located approximately 20 miles east of Aztec, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100 – 5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be in the range of 100-400 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

ATENCIÓN PÚBLICA

Williams Four Corners, LLC, County Road 4900, Bloomfield, NM 87413, han presentado una aplicación de renovación en septiembre de 2008 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para la descarga antes aprobada planean GW-182 para su Navajo Compressor Station localizada en el NE/4, NE/4 de la Sección 2, Municipio 30 Norte, Recorren 8Oeste en San Juan County, New Mexico. La instalación, este de aproximadamente 20 millas localizado de Aztec, proporciona servicios de acondicionamiento y compresión de gas naturales.

El plan de descarga se dirige como las caídas, los agujeros, y otras descargas casuales a la superficie serán manejados. Los materiales típicos generados o usados en la instalación incluyen el echar agua condensado/producir de gas natural, el petróleo de lubricación nuevo y usado, echar agua de desecho aceitoso del equipo se lavan abajo, y glicol. La cantidad de wastewater generado es 100 – 5000 galones por año por motor. La instalación no descarga para revestir o subrevestir los echares agua. Toda la basura generada será temporalmente almacenada en tanques o contenedores equipados con la contención secundaria. La basura transportó offsite será dispuesto o reciclado en una instalación permitida por la agencia estatal, federal, o tribal recibir tal basura. Se espera que la profundidad de agua subterránea estimada en el sitio esté en la variedad de 100-400 pies. El total se disolvió se espera que la concentración de sólidos del agua subterránea de área esté en la variedad de 200-2,000 partes por millón.

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

ATTACHMENT TO THE DISCHARGE PERMIT GW-182
WILLIAMS FIELD SERVICES COMPANY
NAVAJO COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(September 22, 2004)

1. Payment of Discharge Permit Fees: The $100.00 filing fee has been received by the OCD. The $1,700.00 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 permit, with the first payment due upon receipt of this approval.

2. Williams Field Services Company Commitments: Williams Field Services Company will abide by all commitments submitted in the Discharge Permit renewal application dated July 26, 2004.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to Discharge Permit. 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. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans that are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

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

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

15. Storm Water Plan: Williams Field Services Company shall maintain storm water runoff controls. As a result of Williams Field Services Company'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 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. Closure: The OCD will be notified when operations of the Navajo Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Navajo 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. Certification: 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 _____
Title

Michael K. Lane
Environmental Specialist

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No [redacted] dated 7/23/04,

or cash received on _____ in the amount of $ 200⁻

from Williams Field Services

for Lybrook GP / Navajo Cs (Facility Name) GW-47 GW-182 (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: [signature] Date: 7-28-04

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ✓

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

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

Williams

WILLIAMS FIELD SERVICES COMPANY
P. O. Box 21218 * Tulsa, OK 74121-1218

10-2322/719
A/C 9401167

[redacted]

DATE 07/23/2004

PAY TO THE ORDER OF:

PAY ********$200.00

NEW MEXICO OIL CONSERVATION DIV
WATER QUALITY MANAGEMENT FUND
2040 S PACHECO

SANTA FE NM 87505

Bank One, NA
Illinois

[signature]
Authorized Signer

MA1353 (10/99)

[redacted]

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

RECEIVED
JUL 2 8 2004
OIL CONSERVATION DIVISION

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 FACILITES AND CRUDE OIL PUMP STATIONS

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

☐ New ☑ Renewal ☐ Modification

1. Type: Compressor Station (Navajo Compressor Station GW-182)
2. Operator: Williams Field Services Company

   Address: 188 CR 4900, Bloomfield, New Mexico 87413

   Contact Person: Michael K. Lane Phone: (505) 632-4625
3. Location: NE /4 NE /4 Section 2 Township 30N Range 8W
   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. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Michael K. Lane Title: Environmental Specialist

Signature: for Date: July 26, 2004

E-mail Address: Michael.K.Lane@Williams.com

Navajo CDP
Compressor Station

NMOCD
Discharge Plan

Williams Field Services
188 CR 4900
Bloomfield, NM 87413

Table of Contents

1.0 Type of Operation ---- 3
2.0 Legally Responsible Party ---- 3
3.0 Location of Facility ---- 3
4.0 Landowner ---- 3
5.0 Facility Description ---- 3
6.0 Source, Quantity and Quality of Effluents and Waste Solids ---- 3
7.0 Transfer, Storage and Disposal of Process Fluids, Effluents and Waste Solids ---- 4
8.0 Storm Water Plan ---- 4
9.0 Inspection, Maintenance, and Reporting ---- 5
10.0 Spill/Leak Prevention and Reporting (Contingency Plans) ---- 5
11.0 Site Characteristics ---- 6
12.0 Facility Closure Plan ---- 6

List of Tables

Table 1 – Source, Quantity and Quality of Effluent and Waste Solids
Table 2 – Transfer, Storage and Disposal of Process Fluids, Effluents, and Waste Solids

List of Figures

Figure 1 - Site Vicinity / Topographic Map
Figure 2 - Facility Plot Plan

List of Appendices

Appendix A – WFS Spill Control Procedures
Appendix B – NMOCD Notification of Fire, Breaks, Spills, Leaks, and Blowouts
Appendix C – Public Notice

1.0 TYPE OF OPERATION

The Navajo CDP Compressor Station was constructed in 1995 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams Field Services (WFS) system.

2.0 LEGALLY RESPONSIBLE PARTY

Williams Field Services
188 CR 4900
Bloomfield, NM 87413
(505) 632-4625

Contact Person:
Michael K. Lane, Senior Environmental Specialist
Phone and Address, Same as Above

3.0 LOCATION OF FACILITY

The facility is located in Section 2, Township 30 North, Range 8 West, in San Juan County, New Mexico, approximately 20 miles east of Aztec, New Mexico. The facility latitude and longitude are North 36° 50.734,32' and West 107° 38.309,82'. A site location map is attached (USGS 7.5 Min. Quadrangles: Archuleta and Navajo Dam, New Mexico) as Figure 1.

4.0 LANDOWNER

Williams Field Services is leasing the subject property from:

Bureau of Land Management
1235 N. La Plata Highway
Farmington, NM 87401
(505) 599-8900

5.0 FACILITY DESCRIPTION

This facility is a field compressor station and is un-manned. The site has been permitted to allow operation of four (4) 2916 hp engines and three (3) dehydrators. Currently, one (1) engine and two (2) dehydrators exist at the site. Compressors and dehydrators may be installed or removed to meet demand. The facility layout is illustrated in Figure 2.

6.0 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.

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, condensate spill cleanups (spill residue), certain absorbents, 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, 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.

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 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 compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through 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 contracted spill notification service. The service immediately notifies the Williams Environmental Department and all appropriate agencies.

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 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).

11.0 SITE CHARACTERISTICS

The Navajo CDP Compressor Station is located on Pump Mesa. The site elevation is approximately 6,430 feet above mean sea level. The natural ground surface topography slopes downward toward the north. The maximum relief over the site is approximately 15 feet. Intermittent flow from the site will follow natural drainage to the north to an unnamed drainage. The unnamed drainage drains west into the Simon Canyon. Simon Canyon drains south in the San Juan River. The San Juan River, approximately 2 miles to the south-southeast of the site, is nearest down-gradient perennial source of surface water at an elevation of approximately 5,740 feet.

A review of the available hydrologic data[1,2] for this area revealed that there are no water wells within a 1/4-mile radius of Navajo 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 400 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

[1]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.

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

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

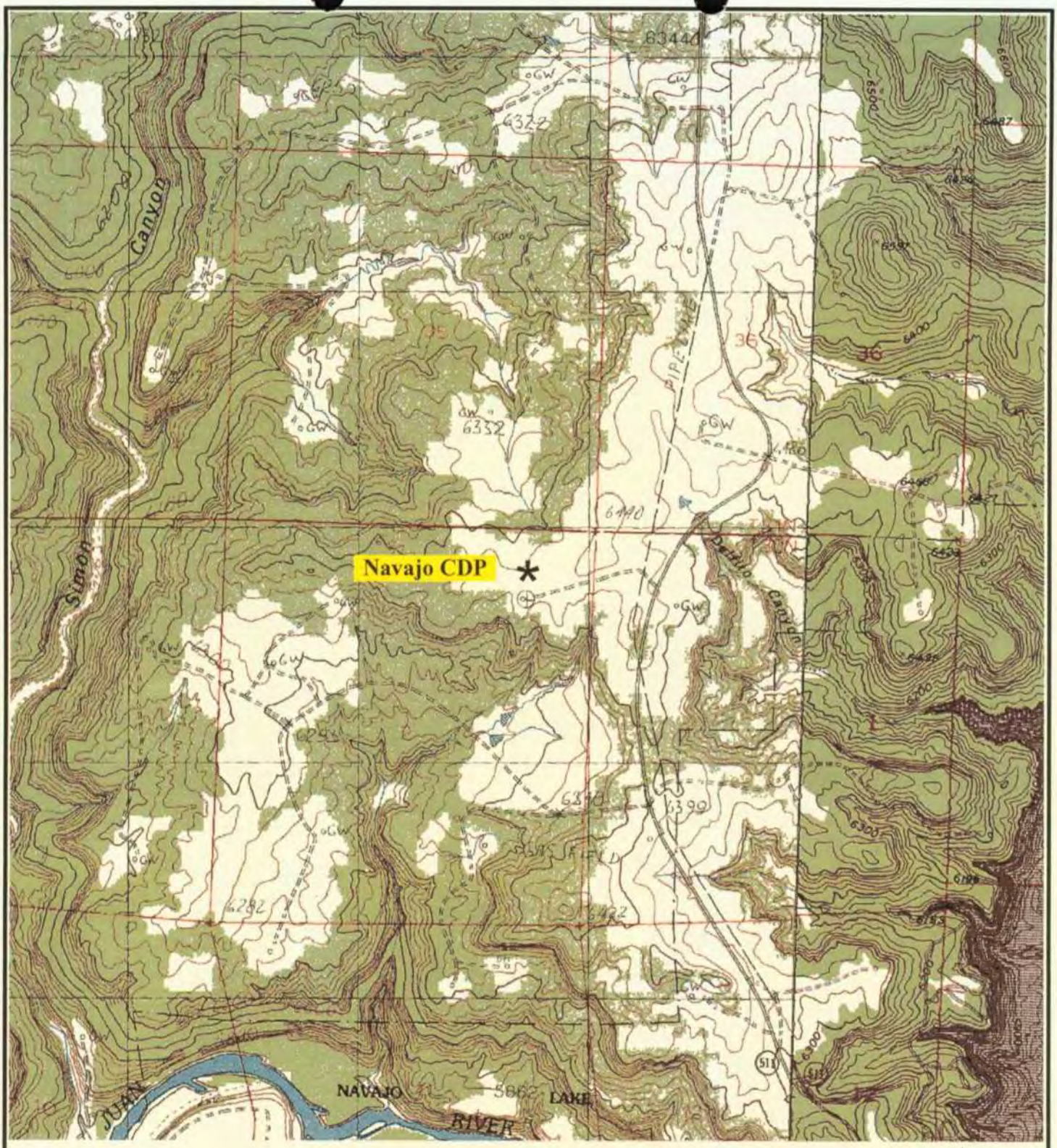
TABLE 1
SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS
NAVAJO CDP COMPRESSOR

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1,000-1,500 gallons/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	50-100 gallons/year/engine	No Additives
Natural Gas Condensate	Scrubber	200-2,000 barrels/year	No Additives
Produced Water	Gas Inlet Separator and Scrubber	2,000-9,000 barrels/year	No Additives
Waste Water	Compressor Skid	500-1,500 gallons/year/engine	Biodegradable soap and tap water w/ traces of oil and glycol.
Used Process Filters	Air, Inlet and Fuel Gas	75-100/year	No Additives
Empty Drums/Containers	Liquid Containers	10-40/year	No Additives
Spill Residue (i.e. soil, gravel, etc)	Incident Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incident Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives

TABLE 2
TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS
NAVAJO CDP COMPRESSOR

PROCESS FLUID / WASTE	STORAGE	STORAGE CAPACITY	CONTAINMENT / SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above-Ground Storage Tank	500 gallons	Waste Water System	Non-Exempt	Transported to a Williams or contractor consolidation point before transport to an EPA-registered used oil marketer for recycling.
Used Oil Filters	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.
Produced Water/ Condensate	Above-Ground Storage Tank	300 barrels	Earthen Berm	Exempt	Saleable liquids may be sold to a refinery. The remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Waste Water	Below-Grade Storage Tank	740 gallons	Dual-Walled Tank	Non-Exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
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.
Empty Drums/Containers	N/A	N/A	Transported to a Williams or Contractor Facility	Non-Exempt	Barrels are returned to supplier or transported to a Williams or Contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
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 the 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Adsorbents	Drum or Other Container	Varies	Transported to a Williams or Contractor Facility in Drum or Other Container	Incident Dependent	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.
Compressor Oil	Above-Ground Storage Tank	500 gallons	Waste Water System	N/A	Off-spec material is recycled or disposed consistent with applicable regulations.
Glycol	Above-Ground Storage Tank	500 gallons (2) 100 gallons (2) 50 gallons	Waste Water System	N/A	Off-spec material is recycled or disposed consistent with applicable regulations.
Antifreeze	Above-Ground Storage Tank	500 gallons	Steel Containment	N/A	Off-spec material is recycled or disposed consistent with applicable regulations.

Figures



Source: USGS Archuleta and Navajo Dam, New Mexico Quadrangles

0 2000
Scale (Feet)

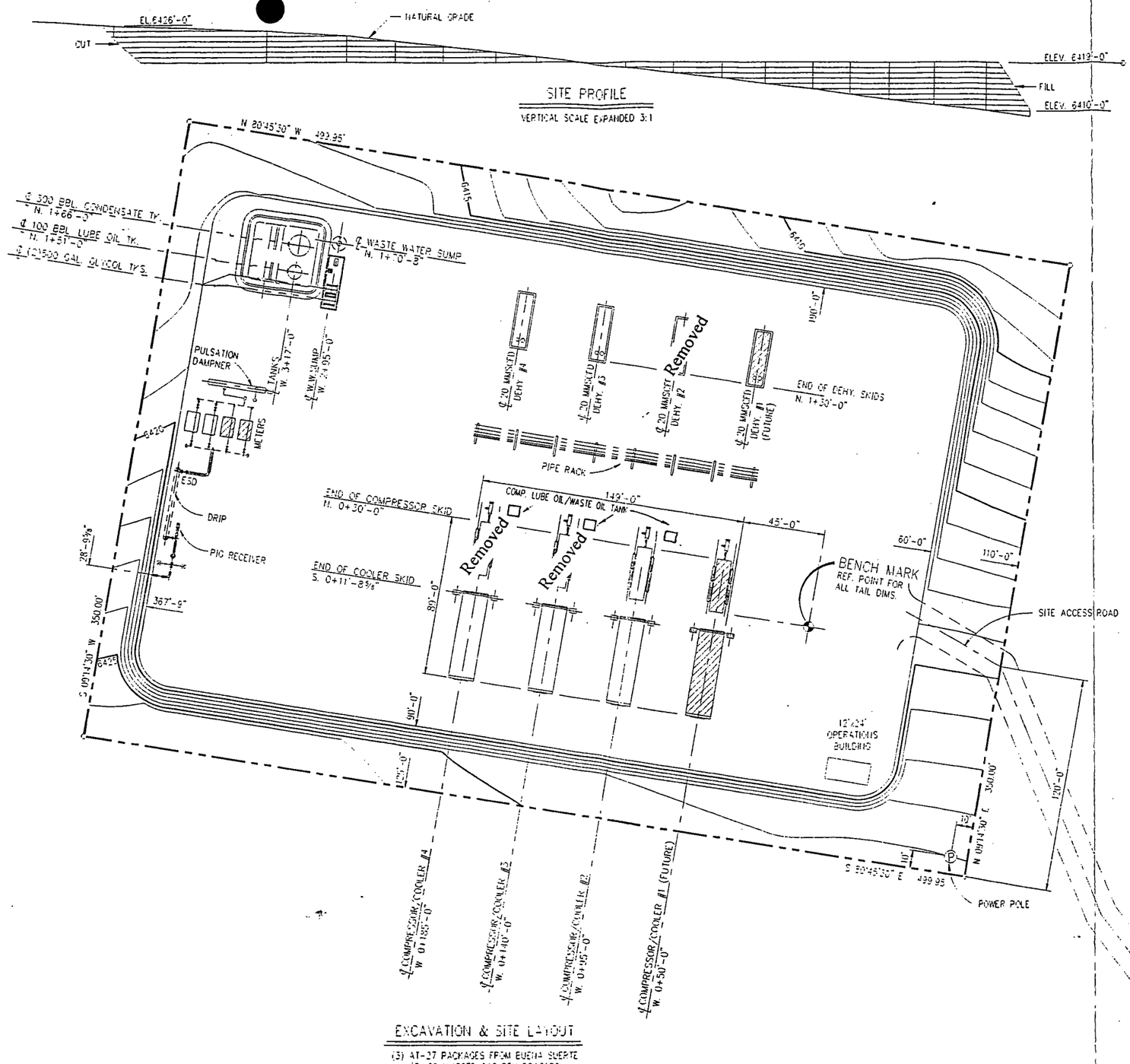
Williams

Figure 1 Site Vicinity / Topographic Map

Navajo CDP Compressor Station

Section 2, Township 30N Range 8W

San Juan County, New Mexico



EXCAVATION & SITE LAYOUT

(3) AT-27 PACKAGES FROM BUENA SUERTE
(3) 20 MMSCFD GAS DEHYDRATORS

PRODUCTION OPERATORS INC.

NO	DATE	BY	DESCRIPTION	W.O. #	APP
0	4/14/95	HFM	ISSUED FOR CONSTRUCTION		

REVISIONS

DRAFTING	BY	DATE
DRAWN	JEP	01/09/95
CHECKED		
APPROVED		
ENGINEERING	**BY**	**DATE**
C & S REVIEW		
PROJECT APPROVED		
PLOT DATE/TIME	12/15/1995 8:41 A.M.	

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

NAVAJO C.D.P.

EXCAVATION & SITE LAYOUT

SCALE: 1" = 30'

W.O. # 11373

DWG. NO. NAV-1-M1

Appendices

APPENDIX A

SPILL CONTROL PROCEDURES

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

Current telephonic
http://processbackbone/livelink/livelink
form WES-35

1.0 OBJECTIVE

1.1 To prevent releases and mitigate their effects if they occur.

2.0 DESCRIPTION

2.1 Company operated assets can be the source of releases into the environment, some of which may be harmful to employees, neighboring communities and the environment in which we all live. The Company has established the following standards to prevent and mitigate these environmental impacts and achieve regulatory compliance.

2.2 The major aspects of the standards are:

2.2.1 Preparation and implementation of a plan for pollution prevention and spill response (e.g.; Spill Prevention Control and Countermeasures (SPCC), Oil Spill Response Plan (OSRP), etc.) for each applicable Company asset to prevent and/or contain a spill.

2.2.2 Preparation and implementation of spill response plans to identify risks and minimize the potential to harm the environment from a release.

2.2.3 Procedure for reporting releases

3.0 STANDARDS

3.1 The Environmental Team Leader shall:

3.1.1 Establish and maintain 6.04-ADM-001 - Pollution Prevention and Control procedure, 24 hour Release Reporting and Notification system (3E) and 6.04-ADM-002 - Release Reporting procedure for Company operated assets. These procedures will, at a minimum, ensure the Company's compliance with applicable regulations and will be reviewed and updated Annually.

3.2 The Environmental Specialist shall:

3.2.1 Establish and maintain pollution prevention and spill response plans, which may include but are not limited to FRPs, SPCCs or OSRPs as required by applicable regulations per the 6.04-ADM-001 - Pollution Prevention and Control procedure.

3.2.2 Coordinate the review and distribution of pollution prevention and spill response plans, which may include FRPs, SPCCs and OSRPs every 5 years from the date of certification and/or modify the plan to address new or different operating conditions or deficiencies within 30 days of identification. Offshore plans shall be reviewed every 2 years. Documentation of the review shall be provided to the MMS Regional Supervisor.

3.2.3 When new or additional tasks are required, add the necessary tasks to the EMIS within 30 days of identification.

3.2.4 Distribute the pollution prevention and spill response plans.

3.3 The Manager of Operations shall:

3.3.1 Coordinate the timely execution of the EMIS/EMPAC pollution prevention and spill response plan tasks that are assigned to local Operations management. Submit required documentation to the Environmental Specialist as required by the task.

3.3.2 Prior to initial operation, review pollution prevention and spill response plans, with appropriate personnel as required by EMIS tasks.

3.3.3 Maintain documentation required by the EMIS tasks and distribute copies of documentation as instructed in the task (i.e. secondary containment drainage log, survey data for dikes, etc).

3.3.4 Prior to initiation of operations and on an annual basis thereafter review the facility's pollution prevention and spill response plans. At a minimum, the annual review should include personnel changes, phone number changes and product changes in tanks. Forward any changes to the area Environmental Specialist. Establish and maintain adequate resources are available to execute the pollution prevention and spill response plans.

3.3.5 Report all releases and spills in accordance with the 6.04-ADM-002 - Release Reporting procedure.

3.4 All Employees shall:

3.4.1 Utilize the pollution prevention and spill response plans for responding to spills, as applicable.

4.0 MEASURES

4.1 Number of overdue pollution prevention and spill response plans

4.2 Number of drills conducted versus number of drills required

5.0 LINKS

5.1 6.04-ADM-001 - Pollution Prevention and Control

5.2 6.04-ADM-002 - Release Reporting

5.3 EMIS

5.4 SIP Feedback/Change Request

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 For manned facilities perform daily visual facility inspection. For unmanned facilities perform periodic inspections. Document Inspections on the appropriate Facility Log.

2.2 Perform monthly facility inspections and document on the Facility's Monthly Inspection Form or (equivalent).

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 When to Initiate

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.

2.5.2 For onshore releases: If the spill is reportable (refer to 6.04-ADM-002 - Release Reporting procedure), the appropriate person (usually person discovering the release) will immediately notify the 24 hour O&TS release hotline at 1-888-677-2370 and, if necessary, local emergency response personnel/contractors.

NOTE

The current 24 hour O&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.

2.5.3 Offshore releases: If the spill creates a sheen (refer to 6.04-ADM-002 - Release Reporting 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.

2.5.4 Receiving and reviewing the initial release report

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.

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.

2.5.4.3 Offshore releases: The ES will complete the WES-35 - 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.

2.5.5 Receiving a final release report

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.

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.

2.5.6 Providing Follow-up Information on the Release

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.

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, 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.

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 dike calculations to be conducted, as required by the EPA for SPCC plans

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 3 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. The facility is responsible for ensuring all personnel receive the required SPCC/FRP training on an annual basis.

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

3.3 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 SIP-ADM-12.01 - Emergency Response and Planning

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 **Hydrocarbons and Other Fluids** – Hydrocarbons and other fluids include oil, gasoline, diesel, condensate, solvents, other petroleum products, and any mixture of water with any of the above liquids.

4.7 **MMS** – Minerals Management Service

4.8 **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.

4.9 **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.

4.10 **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.

4.11 **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).

4.12 **OSRO** – Oil Spill Response Organization

4.13 **PREP** – National Preparedness for Response Exercise Program

4.14 **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.

4.15 **RSPA** – Research and Special Programs Administration

4.16 **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.

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

4.18 **USCG** – United States Coast Guard

➢➢➢End of Procedure≺≺≺

1.0 PURPOSE

1.1 To define the process for reporting releases.

2.0 PROCEDURE

2.1 This Procedure Applies To Liquid And Gas Releases.

2.2 The Environmental Specialist (ES) will:

2.2.1 Provide information and guidance to each Area where exceptions to this procedure are required based on State laws, rules and/or permit conditions, including specifics on the required alternate or revised reporting.

2.2.2 Review scheduled blow-down events in order to determine whether or not a permit is required. Allow sufficient time for Operations to obtain a gas analysis if necessary – data may be required in calculations.

2.2.3 Coordinate with appropriate regulatory agencies, obtain required permits and inform Operations of regulatory requirements that must be met prior to performing blow-downs.

2.2.4 Submit release follow-up information to the applicable regulatory agencies.

2.2.5 Contact local Operations to ensure adequate response measures have been taken for each release and track closure of each release with the appropriate regulatory agencies, if necessary.

NOTE

Third parties operating Company' facilities (i.e., Hanover/POI) are responsible for adhering to this guidance document and reporting releases appropriately. Written reports are required to be submitted to Agencies within 5 – 7 days of the notification of a reportable release and Operations will be involved in verifying that the information submitted by the Area Environmental Specialist is accurate.

2.3 Offshore Releases

2.3.1 A reportable offshore release is:

2.3.1.1 Any atmospheric releases greater than 50 mscf when in gaseous form prior to release. This threshold may be increased by the ES for specific areas or facilities based on state and local regulations.

2.3.1.2 Any liquid release that causes a sheen.

2.3.2 Gas Only Releases

2.3.2.1 Operations will immediately report all reportable offshore gas releases within one hour of occurrence or discovery to the Environmental Specialist and the DOT Compliance Coordinator.

2.3.2.2 The Environmental Specialist and the DOT Compliance Coordinator will determine whether the incident is reportable to any regulatory agencies, and will complete any required telephonic reporting to the appropriate regulatory agencies.

2.3.2.3 The Environmental Specialist will complete the WES Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 5 working days.

2.3.2.4 The Environmental Specialist and DOT Compliance Coordinator will complete any required follow-up written reports and/or documentation.

2.3.3 Liquid Hydrocarbon or Gas and Liquid Hydrocarbon Releases

2.3.3.1 Operations will immediately report any offshore release that causes a sheen to O'Brien's Oil Pollution Services (OOPS) (985-781-0804). OOPS will make the required notifications and reports to the appropriate regulatory agencies.

2.3.3.2 Operations will also immediately report any offshore releases to the Environmental Specialist and the DOT Compliance Coordinator that meet the reportable criteria of this document.

2.3.3.3 The Environmental Specialist will complete the WES-35 - Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 5 working days, based on the release report provided by OOPS.

2.3.3.4 The DOT Compliance Coordinator will complete any required follow-up reports and/or documentation relating to transportation-related agency requirements (e.g., DOT).

2.4 Onshore Releases

2.4.1 Operations will communicate all reportable onshore releases within one hour of their occurrence or discovery to 3E at 1-888-677-2370. Refer to the Onshore Release/Spill Notification Flowchart. 3E will notify the appropriate regulatory agencies in accordance with the Release Matrices.

2.4.2 A Reportable Release is:

2.4.2.1 A release of liquid (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) where the release is greater than 1 gallon if a one-time event, or greater than 5 gallons within a 24-hour period if a cumulative event (i.e., drips). See exclusions in 2.4.3.

2.4.2.2 Any release of liquid (greater than 1 gallon) outside the facility boundary

2.4.2.3 Any release, regardless of size, which enters a waterway (i.e., ditch, arroyo, intermittent stream, etc.)

2.4.2.4 All atmospheric releases greater than 50 mscf when in gaseous form prior to release. This threshold may be increased by the ES for specific areas or facilities.

2.4.3 A Non-Reportable Release is:

2.4.3.1 Sheen on rainwater within a facility not resulting from a release event. Sheen on rainwater in dikes and/or valve boxes not resulting from a release event. (Follow proper disposal and housekeeping practices.)

2.4.3.2 Gaseous releases less than 50 mscf. This threshold may be increased by the ES for specific areas or facilities.

2.4.3.3 Routine, permitted gaseous releases to a control device (i.e., a flare)

NOTE - FLARES

A flare may have permit limits and may require tracking of flaring events. Refer to facility specific flare procedures if applicable. Any exceedance of permit limits (including smoking flares) must be immediately reported to your local Environmental Specialist and not to 3E.

2.4.4 The information required to be reported for all onshore releases is listed in WES Release Report Form.

2.5 Whom to Call:

2.5.1 Onshore Releases – Our third party contractor (3E) at the toll free number 1-888-677-2370.

2.5.2 Offshore releases involving a sheen – Our third party contractor (OOPS) at the number 1-985-781-0804, your area ES and the DOT Compliance Coordinator.

2.5.3 Offshore Releases not involving a sheen – Your area ES and the DOT Compliance Coordinator.

2.6 Post Report Follow-up

2.6.1 The following information on all Reportable Releases will be submitted to the Environmental Specialist by Operations within 45-days of the release or its discovery:

2.6.1.1 Quantity of soil removed to capture release

2.6.1.2 Description of soil "disposal" (i.e., land, farm, landfill)

2.6.1.3 Quantity of water/product removed and disposed of to respond to release

2.6.1.4 What was done with the water/product

2.6.1.5 Update of the cost incurred from the release. This includes the cost of lost product, associated repair costs and costs to respond to and clean up the release (payroll, material/supplies and/or outside services), even if only a portion of this information is known

2.6.2 The Environmental Specialist will ensure:

2.6.2.1 The required written reports are completed and sent to the SERC following a release that has been reported to a federal or state agency.

2.6.2.2 The release database is updated with quantities released and remedial action taken.

2.7 The Release Report Database Compliance Specialist in Tulsa will maintain the release database, to include follow-up information. Operations is not required to maintain copies of release reports; however, Operations will be responsible to ensure adequate and accurate information is provided to 3E, the ES, and the DOT Compliance Coordinator.

3.0 REFERENCES

3.1 Regulatory - There are various regulatory requirements at the State and Federal level that require Williams to report releases. The releases that exceed their specific reportable quantity will be reported to the appropriate regulatory agencies.

3.2 Related Policies/Procedures

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

3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Offshore Incident Notification Matrix

3.3.3 Onshore Release/Spill Notification Flow Chart

3.3.4 Offshore Incident Notification Matrix

3.3.5 Telephonic and Written Release Reporting Requirements

3.3.6 SIP Feedback/Change Request

4.0 DEFINITIONS

4.1 **Liquid** - For the purposes of these reporting criteria, a substance should be reported as a liquid release if it exists in liquid form at the time of the release. Liquid releases should be reported using the measurement unit used when transporting the product. Under some circumstances both liquids and gases are released, and each should be reported separately.

4.2 **Gas - For the purposes of these reporting criteria, a substance should be** reported as an atmospheric release of gas if it exists in gaseous form at the time of the release. Gas releases should be reported using the measurement unit used when transporting the product (i.e., natural gas: mscf; propane: barrels, etc.). Under some circumstances both liquids and gases are released, and each should be reported separately.

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 local Operations (graveled, mowed, cleared, etc.), excluding pipeline right-of-ways.

4.4 **Offshore Release -** Any release that occurs in a Title E effected zone.

4.5 **Onshore Release -** Any release that does not occur in a Title E effected zone.

➢➢➢End of Procedure≺≺≺

WES Release Report Form

Call 3E at 1-888-677-2370 to report all releases (suspected or confirmed)

Is this a drill: ▼ Type of Drill: ▼

Release Reported by: Report Time:

Please provide the correct spelling

Phone Number: Job Title:

Date Release Occurred:

Month ▼ Day ▼ Year ▼ State ▼

Product Released: ▼

Released to: ▼

Define Other:

Estimated Released	0 (a)
Estimated Free Liquids Recovered	0 (b)
Estimated Amount Recovered Soil	0 (c)
Estimated Total Amount Recovered	0 (b+c)
Estimated Amount Not Recovered	0 (a-b-c)

Note: For a release to be contained inside of a "dike" it must be a permanent dike designed specifically to contain releases.

Release Reportable? ▼ Waterway Affected? ▼ Name

3E should inform the regulatory agencies listed below, that Emergency Response is not required.

Report	Date	Number	Time	Name	Title	City	State
NRC ☐							
SERC ☐							
3E Only	Was a written report requested?		Time Frame ▼	Days			
TNRCC ☐							
3E Only	If a written report is requested, do not provide it. Contact Environmental Specialist.						
LEPC ☐							
Other ☐							

Business Unit ▼ Asset Group ▼

Inside Facility Boundary? ▼ Facility Type: ▼

Facility Asset: ☐ Facility Name:

OR

Pipeline Asset: ☐ Pipeline Name: Pipe Type: ▼

3E can search the data base by: Pipeline, Terminal, Station, Receipt Facility or Delivery Point.

Note: Check "Pipeline Asset" if release occurs on a pipeline outside the facility boundary. Breakout Tank? ▼

Incident Summary:

WES Release Report Form

Call 3E at 1-888-677-2370 to report all releases (suspected or confirmed)

Release Discovered by: | Discover Time

Release Verified: | Verification Time: | Release Stop Time:

District: | Area:

Area Supervisor:

Address of Release | City:

Nearest City: | County: | Zip Code:

DOT Jurisdiction: | Engineering Stationing Number:

Note: Determine if the release is from a DOT Jurisdictional asset whether inside or outside a facility.

Caller's E-mail Address: | Provide spelling of e-mail address.

Pipeline Address:

Section | Township | Range | Milepost | Tract #

Offshore | Latitude | Longitude

Origin of Release:

Owner of well site or Leasehold where release/spill occurred:

Cause (pre-investigation) Check all that apply:

Third Party Damage ☐	Equipment Failure ☐	Material or Weld Failure ☐
Internal Corrosion ☐	Other ☐	Excavation Damage ☐
External Corrosion ☐	Incorrect Operation - Contractor ☐	Intentional Blowdown: ☐
Natural Forces ☐	Incorrect Operation - Operator ☐	*Maintenance* ☐ *Non-Maintenance* ☐

Did water affect the release in any way? | If Yes, Explain:

Temp | Relative Humidity | Precipitation

Cloud Cover | Wind Speed | Wind Direction

Injury | Fire | Fatality | Explosion | Unconsciousness

3 or more Hospitalized | Significant News Coverage

Incident Classification: | Loss/Damage Estimate:

Loss and damage estimate should include all costs associated with clean-up (maintenance, clean-up, product loss).

Environmental Contact for release:

Safety Contact for this release:

Form completed by: | Completion Date:

Latest revision date for form 05/06/03

Replaces previous revision date 01/24/03

APPENDIX B

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

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? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ 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:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
E-mail Address:	Conditions of Approval:	Attached ☐
Date: Phone:		

* Attach Additional Sheets If Necessary

APPENDIX C

PUBLIC NOTICE

Four Corners Area
Environmental Department
#188 County Road 4900
Bloomfield, N.M. 87413
Phone: (505) 632-4606
Fax: (505) 632-4781

May 25, 2004

CERTIFIED MAIL – RETURN RECEIPT REQUESTED #7003 0500 0003 9292 7696

State of New Mexico
Property Control Division
Montoya Building
1100 S.St. Francis Drive
Santa Fe, NM 87503

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 Navajo Compressor Station (GW-182). 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 July 2004.

The facility, located in Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico, 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 because the estimated ground water depth at the site is 100-400 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 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 M. Garcia
Environmental Compliance

Four Corners Area
Environmental Department
#188 County Road 4900
Bloomfield, N.M. 87413
Phone: *(505) 632-4606*
Fax: (505) 632-4781

May 25, 2004

CERTIFIED MAIL – RETURN RECEIPT REQUESTED #7003 0500 0003 9292 7689

Bureau of Land Management
1235 N. La Plata Highway
Farmington, NM 87401

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 Navajo Compressor Station (GW-182). 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 July 2004.

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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 M. Garcia
Environmental Compliance

OCD copy

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-182
WILLIAMS FIELD SERVICES
NAVAJO CDP COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(November 12, 1999)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for compressor stations. The renewal flat fee required for this facility is $690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval.

2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan renewal application dated September 22, 1999 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than February 21, 2000 and every 5 years, from tested date, thereafter. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

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

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

15. Closure: The OCD will be notified when operations of the Navajo CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Navajo 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.

16. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by _____

Title Env't'l Spec

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

February 21, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.P-176-012-115

Mr. H. Lee Bauerle
Williams Field Services, Inc.
P.O. Box 58900
Salt Lake City, Utah 84158-0900

RE: Discharge Plan GW-182
Navajo C.D.P. Compressor Station
San Juan County, New Mexico

Dear Mr. Bauerle:

The discharge plan GW-182 for Williams Field Services, Inc. Navajo C.D.P. Compressor Station located in the NE/4 NW/4 of Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated October 28, 1994.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F. which provide for possible future amendments or modifications of the plan. Please be advised the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface water, ground water, 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 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 require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4., this plan is for a period of five (5) years. This approval will expire on February 21, 2000, and you should submit an application in ample time before this date.

VILLAGRA BUILDING - 406 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970
Oil Conservation
827-7131

The discharge plan application for the Williams Field Services, Inc. Navajo C.D.P. Compressor Station is subject to WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat fee. The flat fee for compressor stations site rated with more than 1000 horsepower and less than 3000 horsepower is six hundred ninety dollars ($690.00).

The $50.00 filing fee has been received by the OCD. 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 being due upon receipt of this letter.

Please make all checks payable to the **NMED - Water Quality Management** and send 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. LeMay
Director

WJL/cee
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-182 APPROVAL
WILLIAMS FIELD SERVICES, INC.
NAVAJO C.D.P. COMPRESSOR STATION
DISCHARGE PLAN REQUIREMENTS
(FEBRUARY 21, 1995)

1. Drum Storage: All drums will be stored on pad and curb type containment.

2. Sump Inspection: All pre-existing sumps will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.

3. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.

4. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.

5. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and appropriate district office pursuant to WQCC Rule 1-203 and OCD Rule 116.