

**GW - 182**

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

**2006 - 1994**

RECEIVED

2007 NOV 13 AM 11 55



Environmental Department  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4625  
505/632-4781 Fax

November 7, 2007

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

RE: Update to Williams Four Corners, LLC OCD Discharge Plans

Dear Mr. Lowe,

Williams Four Corners, LLC (Williams) would like to update the "Description of Final Disposition" for wastes generated at its facilities, and to include clarification of sources of waste streams not previously specified in its existing OCD Discharge Plans. These items are discussed in Table 1, "Storage and Disposal of Process Fluids, Effluent and Waste Solids", and Table 2, "Source, Quantity, and Quality of Effluent and Waste Solids", in each of Williams' current facility-specific OCD Discharge Plans. (Note that in older plans, these table numbers are reversed).

More specifically, the updates to Table 1 include replacing language that stated waste would be disposed at a "NMOCD-approved" or simply "approved" disposal facility with text that states waste will be disposed at "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." Recently, Williams has had some difficulty using NMED-approved disposal sites due to the current language.

Updates to Table 2 include expanding the "Source" of "Used Process Filters" to include amine filters, charcoal, activated carbon, and molecular sieve in addition to the air, inlet, fuel, fuel gas and glycol filters typically included in the Discharge Plans. Additionally, the "Source" of "Condensate and/or Produced Water" has been expanded to include the inlet scrubber, gas inlet separator, and dehydrators. These changes are included for clarification purposes only and provide a more descriptive list of waste that may be generated at the facilities. All of the items listed are related to existing processes at the facilities.

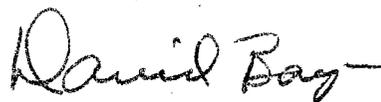
Please see the attached Table 1 and Table 2, from the recent OCD Discharge Plan renewal application for Williams' Rosa Compressor Station, for an example of how the updates apply at a typical Williams' facility. The updated information is indicated by bold text. We will update this information in each OCD Discharge Plan as it comes up for renewal. In the meantime, we request that the updates described herein are effective immediately for the sites listed below upon your receipt of this letter.

Five Points (GW-078)  
29-6#2 (GW-121)  
29-6#3 (GW-198)  
29-6#4 (GS-122)  
30-5 (GW-108)  
31-6 (GW-118)  
32-7 (GW-117)  
32-8#2 (GW-111)  
32-8#3 (GW-116)  
32-9 (GW-091)  
Aztec (GW-155)  
Blanco (GW-327)  
Cabresto (GW-352)  
Carracas (GW-112)  
Cedar Hill (GW-087)  
Chaco (GW-331)  
Coyote (GW-250)  
Crouch Mesa (GW-129)  
Culpepper (GW-353)  
Decker Junction (GW-134)  
Dogie (GW-330)  
El Cedro (GW-149)  
Glade (GW-321)  
Hare (GW-343)  
Honolulu (GW-315)  
Horse Canyon (GW-061)  
Horton (GW-323)  
Kernaghan (GW-271)

La Cosa (GW-187)  
Laguna Seca (GW-307)  
La Jara (GW-223)  
Lateral N-30 (GW-256)  
Lawson Straddle (GW-322)  
Lybrook (GW-047)  
Manzanares (GW-062)  
Martinez (GW-308)  
Middle Mesa (GW-064)  
Milagro (GW-060)  
Navajo (GW-182)  
North Crandell (GW-310)  
Pipkin (GW-120)  
Pritchard (GW-274)  
Pump Mesa (GW-063)  
Quintana Mesa (GW-309)  
Richardson (GW-320)  
Sims Mesa (GW-068)  
Snowshoe (GW-287)  
Thompson (GW-328)  
Trunk A (GW-248)  
Trunk B (GW-249)  
Trunk C (GW-257)  
Trunk L (GW-180)  
Trunk M (GW-181)  
Trunk N (GW-306)  
Wildhorse (GW-079)

These updates are not significant and do not pose a hazard to public health or undue risk to property. These facilities do not discharge wastewater to surface or subsurface waters. All wastes generated at these facilities are temporarily stored in tanks or containers.

Respectfully submitted,



David Bays  
Senior Environmental Specialist

Attachment

**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*	Berm or 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.
Produced Water/Natural Gas Condensate	Above Ground Storage Tank	300 bbl 120 bbl 40 bbl	Berms	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at <b>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.</b>
Wash-down Water	Below Grade Sump, vaulted	70 bbl 45 bbl	Dual-walled tanks	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to <b>any facility permitted by any state, federal, or tribal agency to receive industrial solid waste</b> ; or evaporation at Williams' facility may be considered. <b>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 waste.</b>
Used Oil Filters	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 <b>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.</b> A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
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 <b>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.</b> 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 <b>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.</b> 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		Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	500 gal* 125 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*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

\*Number of tanks installed dependent on number of engines 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**

<b>PROCESS FLUID / WASTE</b>	<b>SOURCE</b>	<b>QUANTITY (Ranges)</b>	<b>QUALITY</b>
Produced Water/Natural Gas Condensate	<b>Inlet Scrubber, Gas Inlet Separator, Dehydrators</b>	2000-8000 bbl/year	No Additives
Waste Water/Wash Down Water	Compressor and Dehy Skids	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	50-500/year/engine	No Additives
<b>Used Process Filters</b>	<b>Charcoal, Activated Carbon, Molecular Sieve</b>	<b>50-500 cubic yd/yr</b>	<b>No Additives</b>
Used Process Filters	<b>Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol</b>	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

2006 AUG 23 AM 11 44



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

August 22, 2006

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

Re: Change of Company Name

Dear Mr. Price;

In accordance with Conditions of Discharge Plan Approval attached to each discharge plan approved by the New Mexico Oil Conservation Division, we hereby provide notice of a change of ownership for the Williams facilities identified in the attached table to Williams Four Corners, LLC.

As a corporate strategy, Williams has created regional limited liability corporations for our assets. So, although a new corporation has been created, Williams Four Corners LLC is still a wholly-owned unit of Williams, and there is no change of corporate ownership for these facilities. Williams will continue to comply with the terms and conditions of all approved discharge plans. All other administrative items (responsible official, environmental contacts, mailing addresses, etc.) remain unchanged.

If you have any questions, please call David Bays, Senior Environmental Specialist, at (505) 632-4951 or Ingrid Deklau of Cirrus Consulting at (801) 583-3107.

Sincerely,

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

David Bays  
Senior Environmental Specialist

Attachments

xc: Clara Cardoza  
Monica Sandoval  
WFS FCA file 210



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

December 14, 2004

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

**Re: Discharge Plan GW-047 and GW-182**

Dear Mr. Ford:

Enclosed please find the signed copy of the discharge plan conditions for the Williams Field Services (WFS) Lybrook Gas Plant and Navajo Compressor Station. Also included are checks 3500047948 for \$4000.00 and 3500048056 for \$1,700 to cover the flat fee required by the approval conditions.

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

Thank you

A handwritten signature in black ink, appearing to read "Clara M. Garcia".

Clara M. Garcia  
Environmental Compliance

enclosures

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 12/3/04,  
or cash received on \_\_\_\_\_ in the amount of \$ 1,700.00

from Williams Field Services

for Nevzjo CS GW-182  
(Facility Name)

Submitted by: [Signature] Date: 12/16/04  
(DP No.)

Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

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

Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal   
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(Specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

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

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

**Williams** WILLIAMS FIELD SERVICES COMPANY  
P.O. BOX 212197 MESA, AZ 85219-0197

DATE: 12/03/2004

PAY TO THE ORDER OF \_\_\_\_\_

PAY  \*\*\*\*\*\$1,700.00

WATER MANAGEMENT QUALITY MANAGEMENT FUND  
C/O OIL CONSERVATION DIV  
1220 S ST FRANCIS DR

SANTA FE NM 87505

Bank One, NA  
Illinois

[Signature]  
Authorized Signer



INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
170000NOV04	20040922	IMAGING-DASMITH-02-DEC	DISCHARGE PERMIT APPLICATION/PO5273	1,700.00

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
[REDACTED]	12/03/2004	94141	WATER MANAGEMENT QUALITY MANAGEMENT FUND	\$1,700.00

AFFIDAVIT OF PUBLICATION

Ad No. 50560

STATE OF NEW MEXICO  
County of San Juan:

CONNIE PRUITT, being duly sworn says:  
That she is the CLASSIFIED MANAGER of  
THE DAILY TIMES, a daily newspaper of  
general circulation published in English at  
Farmington, said county and state, and that  
the hereto attached Legal Notice was  
published in a regular and entire issue of the  
said DAILY TIMES, a daily newspaper duly  
qualified for the purpose within the meaning of  
Chapter 167 of the 1937 Session Laws of the  
State of New Mexico for publication and  
appeared in the Internet at The Daily Times  
web site on the following day(s):

Wednesday, October 6, 2004.

And the cost of the publication is \$143.61.

Connie Pruitt

ON 10-7-04 CONNIE PRUITT  
appeared before me, whom I know personally  
to be the person who signed the above  
document.

Sammy Beck  
My Commission Expires April 2, 2008.

COPY OF PUBLICATION

NOTICE OF PUBLICATION

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

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

(GW-049) - El Paso Natural Gas Co., Mr. Richard Duarte, 3801 Arisco Blvd. NW, Albuquerque, NM 87120, has submitted a renewal application for their "A" Blanco Plant facility located in the NE/4 NE/4 of Section 23, Township 27 West, Range 13 North, NMPM, San Juan County, New Mexico. A small amount of engine wash-down water and storm water runoff is discharged to the City of Bloomfield publicly owned treatment works. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface varies in depth from 14 to 39 feet. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-317) - El Paso Field Services, David Bays, 614 Reilly Ave., Farmington, NM 87401, has submitted a renewal application for the Rattlesnake Canyon Gas Plant, located in the NE/4 of Section 16, Township 32 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 375 barrels per month of produced water with a dissolved solids concentration ranging from 10,000 to 15,000 mg/L is collected in closed steel tanks prior to transport to an OCD-approved disposal facility. Approximately 10 barrels per year of wastewater from equipment washdown are collected in a double-walled underground sump prior to transport to an OCD-approved disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 75 feet with a total dissolved solids concentration ranging from 48 mg/L to 52 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-049-2) - El Paso Field Services, David Bays, 614 Reilly Ave., Farmington, NM 87401, has submitted a discharge permit application for the Blanco C and D Compressor Station, located in the N/2 N/2 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 9,500 barrels per month of crude oil and natural gas condensate are collected in closed-top steel tanks until sale to the Giant Refinery near Bloomfield, NM. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 15 to 40 feet. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-182) - Williams Field Services, Michael K. Lane, (505) 632-4625, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Navajo CDP Compressor Station located in the NE/4 NW/4 of Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. After oil/water separation, approximately 42 gallons per day of process waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Ground water most likely to be affected in the event of an accidental discharge is at a depth of 20 feet with a total dissolved solids concentration of approximately 2000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-047) - Williams Field Services, Mark K. Lane, (505) 632-4625, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Lybrook Natural Gas Processing Plant located in the N/2 NW/4 of Section 14, Township 23 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. After oil/water separation, approximately 3000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 7500 mg/l is disposed of in clay lined evaporation ponds. Ground water most likely to be affected in the event of an accidental discharge is at a depth ranging from 180 to 200 feet with a total dissolved solids concentration of approximately 700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-161) - Williams Production Company, LLC (formerly J. M. Huber Corporation), 999 Goddard Avenue, Ignacio, Colorado 81137 has submitted a renewal application for their ROSA COMPRESSOR STATION located in the SW/4 SE/4 of Section 26, Township 31 North, Range 4 West, Rio Arriba County, New Mexico. Approximately 9 gallons per day of wastewater with a dissolved solids concentration of 1,500 mg/l is collected in a 400 barrel closed fiberglass tank prior to transport off-site to an OCD approved disposal facility. Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth greater than 20 feet with a total dissolved solids concentration ranging from 2000 mg/l to 10000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 30th day of September 2004.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL

JOANNA PRUKOP, Acting Director

Legal No. 50560 published in The Daily Times, Farmington, New Mexico on Wednesday, October 6, 2004.

RECEIVED

OCT 12 2004

OIL CONSERVATION  
DIVISION

NM OIL CONSERVATION DIV.  
1220 ST. FRANCIS DR  
Attn: Ed Martin  
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689  
AD NUMBER: 00089513 ACCOUNT: 00002212  
LEGAL NO: 75034 P.O. #: 05-199-050185  
461 LINES 1 TIME(S) 315.04  
AFFIDAVIT: 5.50  
TAX: 21.44  
TOTAL: 341.98

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, B. Perner, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 75034 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/06/2004 and 10/06/2004 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 6th day of October, 2004 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

*B Perner*

/S/

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 6th day of October, 2004

Notary *Laura E Harding*

Commission Expires: *11/23/07*

dental discharge is at a depth of approximately 75 feet with a total dissolved solids concentration ranging from 48 mg/L to 52 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-049-2) - El Paso Field Services, David Bays, 614 Reilly Ave., Farmington, NM 87401, has submitted a discharge permit application for the Blanco C and D Compressor Station, located in the N/2 N/2 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 9,500 barrels per month of crude oil and natural gas condensate are collected in closed-top steel tanks until sale to the Giant Refinery near Bloomfield, NM. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 15 to 40 feet. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-182) - Williams Field Services, Michael K. Lane, (505) 632-4625, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Navajo CDP Compressor Station located in the NE/4 NW/4 of Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. After oil/water separation, approximately 42 gallons per day of process waste water with a total dissolved solids concentration in excess of 2000 mg/L is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of 20 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-047) - Williams Field Services, Mark K. Lane, (505) 632-4625, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Lybrook Natural Gas Processing Plant located in the N/2 NW/4 of Section 14, Township 23 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. After oil/water separation, approximately 3000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 7500 mg/L is disposed of in clay lined evaporation ponds. Groundwater most likely to be affected in the event of an accidental discharge is at a depth ranging from 180 to 200 feet with a total dissolved solids concentration of approximately 700 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-161) - Williams Production Company, LLC (formerly J. M. Huber Corporation), 999 Goddard Avenue, Ignacio, Colorado 81137 has submitted a renewal application for their ROSA COMPRESSOR STATION located in the SW/4

SE/4 of Section 26, Township 31 North, Range 4 West, Rio Arriba County, New Mexico. Approximately 9 gallons per day of wastewater with a dissolved solids concentration of 1,500 mg/L is collected in a 400 barrel closed fiberglass tank prior to transport off-site to an OCD approved disposal facility. Groundwater most likely to be affected in the event of an accidental discharge at the surface is at a depth greater than 20 feet with a total dissolved solids concentration ranging from 2000 mg/L to 10000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-008) - El Paso Natural Gas, Robert H. St. John, 3300 North "A" Building Two, Suite 200, Midland, TX 79705, has submitted a discharge permit renewal application for the Monument Compressor Station, located in the NW/4 of Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 9,600 gallons per day of processed wastewater with total dissolved solids concentration of 3,500 mg/L is stored in steel tanks prior to transport for disposal in an OCD-approved Class II injection well. Groundwater most likely to be affected in the event of an accidental discharge at the surface is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-144) - Duke Energy Field Services, LP, Mr. Greg Kardos, (505) 628-0282, 3300 N. A Street, Building 7, Midland, Texas 79705, has submitted a discharge renewal application for the West (a.k.a. Westall) Compressor Station located in the SW/4 NW/4 of Section 35, Township 22 South, Range 28 East, NMPM, Eddy County, New Mexico. Duke Energy Field Services, LP certifies that no liquid or solid wastes generated on site are discharged so that they may move directly or indirectly into fresh waters. Any liquid wastes are collected and stored in containers prior to transport offsite to an OCD approved disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 16 feet with a total dissolved solids concentration of approximately 7,843 mg/L. The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-048) - Davis Gas Processing Company, Donald K. Judd, Agent, (432) 682-6311, 211 North Colorado Street, Midland, Texas 79701-4696, has submitted a discharge renewal application for the Denton Gas Plant located in the SE/4 of Section 2, Township 15 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 750 gallons per day of process waste water with a total dissolved solids concentration of approximately 2000 mg/L will be collected and stored on site in closed storage tanks prior to disposal in an OCD approved con-

tract injection Class II well. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 40 feet with a total dissolved solids concentration ranging from 610 to 1600 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 30th day of September 2004.

STATE OF  
NEW MEXICO  
OIL CONSERVATION  
DIVISION

SEAL

JOANNA PRUKOP,  
Acting Director  
Legal #75034  
Pub. October 6, 2004

**NOTICE OF PUBLICATION**

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

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

(GW-049) - El Paso Natural Gas Co., Mr. Richard Duarte, 3801 Atrisco Blvd. NW, Albuquerque, NM 87120, has submitted a renewal application for their "A" Blanco Plant facility located in the NE/4 NE/4 of Section 23, Township 27 West, Range 13 North, NMPM, San Juan County, New Mexico. A small amount of engine wash-down water and storm water runoff is discharged to the City of Bloomfield publicly owned treatment works. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface varies in depth from 14 to 39 feet. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-317) - El Paso Field Services, David Bays, 614 Reilly Ave., Farmington, NM 87401, has submitted a renewal application for the Rattlesnake Canyon Gas Plant, located in the NE/4 of Section 16, Township 32 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 375 barrels per month of produced water with a dissolved solids concentration ranging from 10,000 to 15,000 mg/L is collected in closed steel tanks prior to transport to an OCD-approved disposal facility. Approximately 10 barrels per year of wastewater from equipment washdown are collected in a double-walled underground sump prior to transport to an OCD-approved disposal facility. Groundwater most likely to be affected in the event of an acci-

**Ford, Jack**

---

**From:** Ford, Jack  
**Sent:** Thursday, September 23, 2004 8:47 AM  
**To:** Martin, Ed  
**Subject:** GW-182 for Publication

*W. Jack Ford, C.P.G.  
Oil Conservation Division*

*Telephone: (505) 476-3489*

Letterhead Created By Marketing247.com  
Patent Pending

9/23/2004

RECEIVED

SEP 07 2004

OIL CONSERVATION  
DIVISION



Williams Energy Services-Enve  
188 CR 4900  
Bloomfield, NM 87413  
505/632-4606  
505/632-4781 Fax

September 1, 2004

Mr. Jack Ford  
Oil Conservation Division  
1220 South St Francis Dr  
Santa Fe NM 87505

Re: Drain Line Testing Results at Various Williams Field Services Facilities

Dear Mr. Ford:

Williams Field Services conducted a facility review and drain line testing in accordance to the Oil Conservation Division Discharge Plan requirements. Subsurface, non-pressurized process and wastewater lines were tested. The facility drain line testing reports are enclosed with this letter. A review and testing summary is provided in the table below.

Facility	Permit #	Completion Date	Results	Comments
El Cedro	GW-149	07/26/2004	Passed	
Honolulu	GW- 315	08/05/2004	Passed	Visual inspection, piping above ground
Kutz #1 & #2	GW-045	07/16/2004	Passed	Test done on multiple days
Navajo	GW-182	07/28/2004	Passed	

If you have any questions or require additional information, please contact me at (505) 632-4606.

Respectfully Submitted,

Clara M. Garcia  
Environmental Compliance

Attachments: Drain Line Testing Reports

xc: FCA Environmental 220 File  
Denny Foust, OCD Aztec



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

September 22, 2004

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

Director

Oil Conservation Division

Mr. Michael K. Lane  
Williams Field Services Company  
118 CR 4900  
Bloomfield, New Mexico 87413

**RE: Discharge Plan Renewal GW-182  
Navajo Compressor Station  
San Juan County, New Mexico**

Dear Mr. Lane:

The discharge permit renewal GW-182 for the Williams Field Services Company Navajo Compressor Station located in the NE/4 NE/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 original discharge permit approval for GW-182 dated February 21, 1995, the renewal application dated July 26, 2004 and the attached stipulations of approval. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The Discharge Permit application was submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to 20 NMAC 3109.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provide for possible future amendments or modifications of the permit. Please be advised that approval of this permit does not relieve Williams Field Services Company of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Mr. Michael K. Lane  
Navajo Compressor Station, GW-182  
September 22, 2004  
Page 2

Pursuant to 20 NMAC 3109.G.4., this permit is for a period of five (5) years. This approval will expire on March 31, 2009, and you should submit an application in ample time before this date. Note that under 20 NMAC 3106.F. of the regulations, if a discharger submits a Discharge Permit application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge permit facilities will be required to submit the results of an underground drainage testing program as a requirement for Discharge Permit.

The Discharge Permit application for the Williams Field Services Company Eunice Gas Plant is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a fee equal to the filing fee of \$100 plus a flat fee of \$1,700.00 for compressor stations with greater than 1,001 horsepower. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval. The OCD has received the filing fee.

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

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

Sincerely,

  
Roger C. Anderson  
Environmental Bureau Chief

RCA/wjf

cc: OCD Aztec District Office

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



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

July 12, 2004

**Mark E. Fesmire, P.E.**  
Director  
Oil Conservation Division

Mr. Michael Lane  
Williams Field Services  
188 CR 4900  
Bloomfield, New Mexico 87413

**RE: Discharge Plan Renewal Notice for Williams Field Services Facilities**

Dear Mr. Lane:

The OCD is providing Williams Field Services a notice that the following discharge plans expire at various dates during the of the first quarter of 2005.

**GW-315 expires 1/3/2005 – Honolulu Compressor Station**  
**GW-169 expires 1/4/2005 – La Maquina Gas Plant**  
**GW-182 expires 2/21/2005 – Navajo CDP Compressor Station**  
**GW-181 expires 2/21/2005 - Trunk M Compressor Station**  
**GW-180 expires 2/21/2005 - Trunk L Compressor Station**

**WQCC 20.6.2.3106.F.** If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 20.6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00 plus a flat fee based upon the horsepower rating or type of facility for gas processing facilities. The \$100.00 filing fee for each facility is to be submitted with the discharge plan renewal application and is nonrefundable.

Mr. Michael Lane  
July 12, 2004  
Page 2

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A complete copy of the regulations is also available on OCD's website at [www.emnrd.state.nm.us/ocd/](http://www.emnrd.state.nm.us/ocd/)).

If any of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 476-3489.

Sincerely,



W. Jack Ford, C.P.G.  
Oil Conservation Division

cc: OCD Aztec District Office

*Work copy*

SITE NAME	DISCHARGE PLAN #	CURRENT OCD PLAN # of Units/ HP	ACTUAL INSTALLS # of Units/ HP	AQB PERMITTED # of Units/ HP	
<b>Category 1 - Update OCD Plans for actual compression; AQB permit allows additional installations</b>					
OK 31-6 #1	X	GW-118	6 units/990 HP ea <i>5+4</i>	15 units/1370 HP ea	16 units/1370 HP ea
No Mod. request → OK 32-7 #1	X	GW-117	4 units/895 HP ea <i>ok</i>	6 units/1357 HP ea	8 units/1357 HP ea
No Mod. request → OK 32-8 #2	X	GW-111	4 units/895 HP ea <i>4+2</i>	5 units/1357 HP ea	9 units/1357 HP ea
OK HORSE CYN. CDP	OK	GW-61	4 units/895 HP ea <i>14</i>	6 units/1390 HP ea	14 units/1390 HP ea
OK MIDDLE MESA CDP	X	GW-64	10 units/895 HP ea <i>10+4</i>	19 units/1362 HP ea	20 units/1362 HP ea
OK PUMP MESA CDP	OK	GW-63	6 units/895 HP ea <i>6+6</i>	10 units/1363 HP ea	14 units/1363 HP ea
OK TRUNK N C.S.	OK	GW-306	5 units/1140 HP ea	6 units/1140 HP ea	8 units/1368 HP ea
No Mod. request → OK TRUNK L C.S.	X	GW-180	6 units/990 HP ea	10 units/990 HP ea	14 units/1131 HP ea
<b>Category 2 - OCD Plan currently reflects all AQB permitted units; however, all units not yet installed</b>					
29-6 #4CDP		GW-122	10 units; total site HP 10,980 <i>4+3</i>	6 units/1377 HP ea.; 1 unit/1148 HP	9 units/1377 HP ea.; 1 unit/1148 HP
32-9 CDP		GW-91	8 units/1379 HP ea	5 units/1379 HP ea	8 units/1379 HP ea
OK CEDAR HILL CDP		GW-87	10 units/1386 HP ea <i>OK 5+1</i>	7 units/1386 HP ea	10 units/1386 HP ea
KERNAGHAN B-8 STRADDLE		GW-272	2 units/764 HP ea	1 unit/764 HP	2 units/764 HP ea
MANZANARES CDP		GW-62	4 units/895 HP ea	3 units/895 HP ea	4 units/1300 HP ea
MOORE STRADDLE		GW-273	2 units/ 778 HP ea	1 unit/ 778 hp	2 units/ 778 hp ea
NAVAJO CDP		GW-182	4 units/2946 HP ea	3 units/2916 HP ea	4 units/2916 HP ea
TRUNK A BOOSTER C.S.		GW-248	6 units/1367 HP ea	3 units/1367 HP ea	6 units/1369 HP ea
TRUNK B BOOSTER C.S.		GW-249	7 units/1367 HP ea	3 units/1367 HP ea	7 units/1367 HP ea
MARTINEZ DRAW		GW-308	2 units/1380 HP ea	1 unit/1380 HP	2 units/1232 HP ea
QUINTANA MESA		GW-309	2 units/1380 HP & 1151 HP	1 unit/1232 HP	2 units/1232 HP & 1118 HP
<b>Category 3 - Update OCD Plans for actual compression; all AQB permitted units installed</b>					
29-6 #2CDP	X	GW-121	5 units/895 HP ea. <i>5+2</i>	12 units/1370 HP ea.	12 units/1370 HP ea.
ROSA #1 CDP	X	GW-292	1 unit/1372 HP	2 unit/1372 HP	2 units/1371 HP ea
TRUNK M C.S.	X	GW-181	1 unit/990 HP	2 units/1378 HP ea	2 units/1378 HP ea
PIPKIN		GW-120	2 units/856 HP total	1 unit/1403 HP	1 unit/1403 HP
LA JARA FIELD	X	GW-233	1 Solar T-3000/ 2831 hp; 2 Solar T-4000/ 2897 hp ea.	2 Solar T-4000, 2 Solar T-4700S, 1 Solar T-4700=total 17,700 hp	2 Solar T-4000, 2 Solar T-4700S, 1 Solar T-4700=total 17,700 hp

OK  
No Mod. request → OK  
No Mod. request → OK  
OK  
OK  
OK  
OK  
No Mod. request → OK

Notice of add. 9 units 7-97. No final app.  
Notice on renewal  
(mod. to 14 units '94)  
(14 units in renewal app. '94)  
(6 units in app. '95)  
(up to 8 units in renewal app. '98)

OK

-change hp rating

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 12-1-99,

or cash received on \_\_\_\_\_ in the amount of \$ 690.00

from Williams Field Services

for Navajo CDP Compressor Station GW-182

Submitted by: W. J. Paul Date: 12-08-99

Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

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

Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal   
Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 2000

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.

COMMUNITY NATIONAL BANK  
OKARCHIE, OK 73762

WILLIAMS FIELD SERVICES COMPANY  
1800 South Baltimore Avenue • P.O. Box 645 • Tulsa, OK 74101-0645

DATE: 12/01/1999

PAY TO THE ORDER OF:

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

SANTA FE  
United States

NM 87504

PAY → \*\*\*\*\*\$690.00

VOID AFTER 180 DAYS

*W. J. Paul*  
Authorized Signer

MA-1353 (6/97)

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
NAVAJO11-99	199911	0025948-SLC119907010	INVOICE #NAVAJO11-99	690.00

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
[REDACTED]	12/01/1999	40665	NEW MEXICO OIL CONSERVATION DI	\$690.00

P. O. Box 1980  
Hobbs, NM 88241-1980  
District II - (505) 748-1283  
811 S. First  
Artesia, NM 88210  
District III - (505) 334-6178  
1000 Rio Brazos Road  
Aztec, NM 87410  
District IV - (505) 827-7131

NEW MEXICO  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

RECEIVED  
SEP 27 1999  
Environmental Bureau  
Oil Conservation Division

Revised 12  
Submit On  
Plus 1 C  
to San  
1 Copy to approp  
District C

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,  
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS**  
(Refer to the OCD Guidelines for assistance in completing the application)

New       Renewal       Modification

1. Type: Natural Gas Compressor Station - Navajo CDP
2. Operator: Williams Field Services  
Address: 295 Chipeta Way, SIC UT 84108  
Contact Person: Ingrid Deklan Phone: 801-584-6543
3. Location: NE 14 NW 14 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. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: Ingrid Deklan Title: Entire Specialist  
Signature: [Handwritten Signature] Date: 9/22/99



295 Chipeta Way  
P.O. Box 58900  
Salt Lake City, UT 84108  
801/584-6543  
801/584-7760

September 22, 1999

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

**Re: OCD Discharge Plan Renewal: Navajo Compressor Station (GW-182)**

Dear Mr. Anderson:

Enclosed, please find the application for the Discharge Plan Renewal of Williams Field Services (WFS) Navajo Compressor Station (GW-182). Check number 2185991 for \$50 to cover the application fee was mailed on September 21, 1999 under separate cover. The information attached serves to summarize and update information submitted by WFS in the October 1994 application. For your information, documents in the WFS files that are believed to constitute the Navajo Compressor Station Discharge Plan are listed below.

Undated letter (apx 3/99)	WFS update of compressor installations
October 16, 1997	WFS notification of temporary tank installation
July 7, 1995	OCD approval of update
May 24, 1995	WFS Discharge Plan Update (reduce 10 engines to 4)
April 25, 1995	OCD approval of update
March 12, 1995	WFS Discharge Plan Update (install wastewater sump)
February 21, 1995	OCD approval of application
October 24, 1994	WFS Application

If you have any questions, I can be reached at (801) 584-6543. Your assistance in handling these matters is appreciated.

Sincerely,



Ingrid A. Deklau  
Senior Environmental Specialist

enclosures

xc: Denny Foust, Aztec OCD Office

Information in the following sections updates information included in the October 1994 application and subsequent updates submitted to the OCD by WFS. The text below is formatted to correspond to the format of the October 1994 application. A plot plan of the facility is included as an attachment following this letter for your convenience.

## **1.0 GENERAL INFORMATION**

### **1.1 Contact Person**

Ingrid Deklau  
Environmental Specialist  
801-584-6543

### **Landowner**

State of New Mexico  
PO Box 1148  
Santa Fe, New Mexico 87504

### **1.3 Type of Natural Gas Operation**

There are currently 3 compressor units (2916 hp, site-rated) and 2 dehys operating at the site. However, the current New Mexico Air Quality Permit for this site allows the installation of 4 compressor units and 3 dehys.

## **2.0 GENERAL PROCESSES**

### **2.1 Process Fluids**

Table 1 below has been redesigned to illustrate transfer, storage, and disposal of process fluids, effluents, and waste solids.

### **2.2 Spill/Leak Prevention and Housekeeping Procedures**

Additional information: An updated copy of the WFS Corporate policy and procedures for controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided following the site diagram included in this letter. WFS Environmental Affairs will report significant spills and leaks to the OCD pursuant to OCD Rule 116 and WQCC 1-203.

### **2.3 Disposal of Waste Fluids**

No new waste streams have been generated since the plan was originally submitted in 1994. Section 2.3, as it appears in the August 1993 application is accurate, with the following exceptions. 1) Used motor oil is collected in a closed piping system that drains to a 500-gal used oil tank adjacent to each compressor. 2) Distilled water vapor that condenses within the steam line of the glycol regeneration process is gravity-drained to the skid, and then directed to a 740-gal waste water storage tank.

**TABLE 1  
TRANSFER, STORAGE, AND DISPOSAL OF EFFLUENTS, AND WASTE SOLIDS  
NAVAJO COMPRESSOR STATION**

PROCESS FLUID/WASTE	SOURCE	STORAGE (typical)	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Compressors, engines	AST*	1@ 500 gal adjacent to each compressor	Berm	Non-exempt	Transported to EPA-registered used oil marketer for recycling.
Produced Water	Filter Separator, Pipe Rack, Scrubbers, Inlet Filters, Dehys Pulsation Bottle	AST*	300 bbl	Berm	Exempt	Hauled to NMOCD-approved facility
Wash Down/ Waste Water	Rain/ wash down water off equipment skids; draw-off produced water tank	Sump	740 gal	Double-wall, fiberglass tank	Non-exempt; Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered.
Used Glycol	Dehydration	N/A	N/A	Not currently stored on site	Exempt	Transported to vendor for recycling, or disposed at approved facility
Used process filters (eg, glycol, inlet filters)	Dehydrators, hydrocarbon removal	Special waste bin	Varies	N/A	Exempt	Drained and transported to approved disposal facility.
Used Oil Filters	Compressors, engines	Special waste bin	Varies	N/A	Non-exempt	Drained and transported to approved disposal facility.
Spill Residue (i.e., soil, gravel) or other exempt waste	Incidental spills, leaks, or cleanup	Incident dependent	N/A	In-situ treatment, landfarm, or alternate method	Incident dependent	Landfarmed on-site or disposed at OCD-approved facility (free liquid will be removed from residue, i.e., pumping, solidification, evaporation). On-site treatment will be conducted per applicable NMOCD Guidelines.
Used Absorbents	Incidental spills, leaks, or cleanup	Special waste bin	Varies	N/A	Non-exempt	Drained and transported to approved disposal facility.
Lube Oil	For use in compressors, engines, etc.	AST*	1@ 500 gal adjacent to each compressor; 100 bbl bulk storage	Berm	N/A	N/A
Glycol	For use in dehys	AST*	500 gal	Berm	N/A	N/A
Antifreeze	Used in equipment to prevent freezing	AST*	500 gal	Berm	N/A	N/A

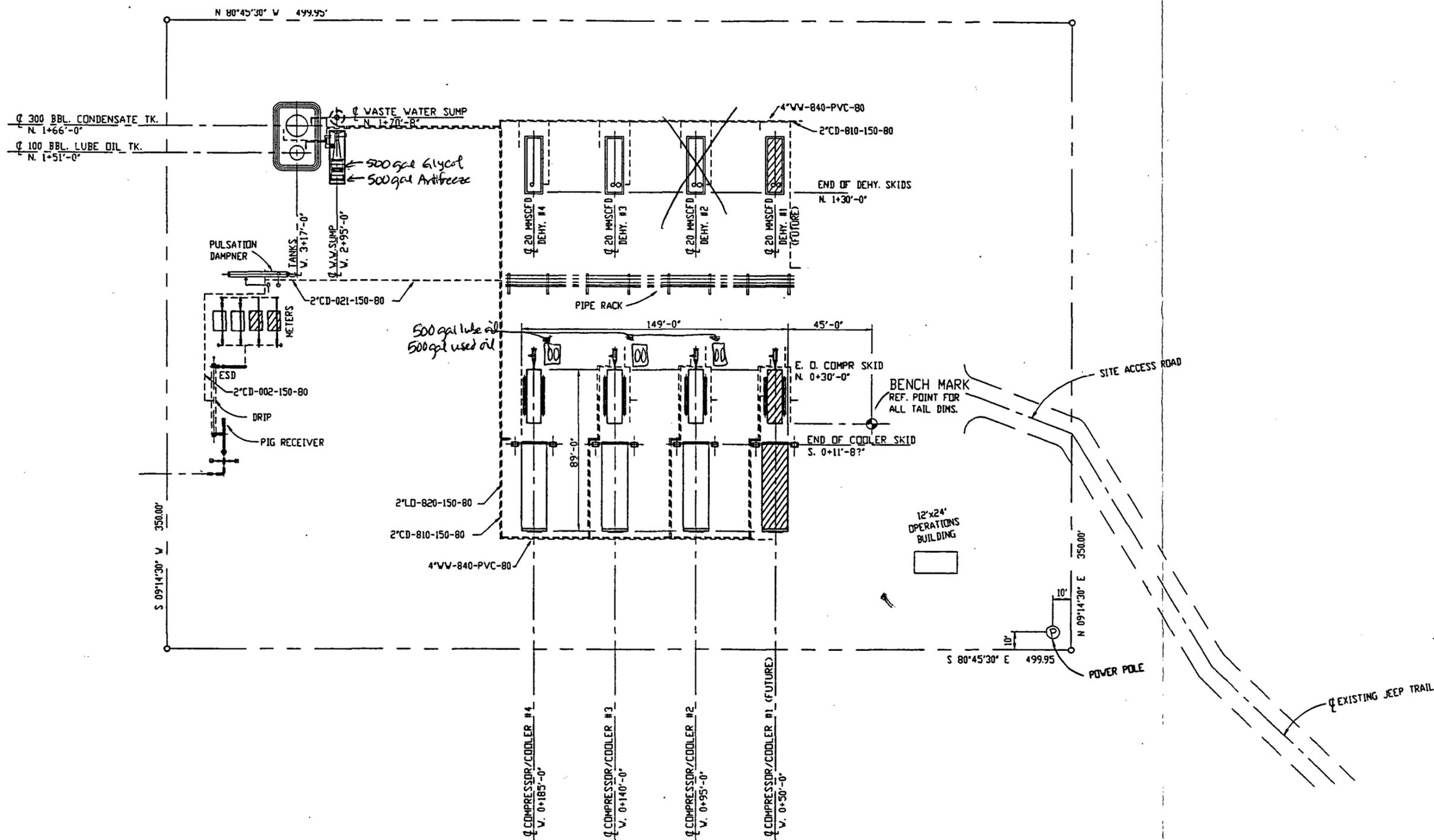
\*AST= Above Ground Storage Tank

OPERATIONS

Scale: 1' = 60'

Subject or Title: SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS





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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

A. PURPOSE AND SCOPE

- A.1 To establish the policy and procedure for preventing, controlling, and reporting of discharges or spills of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
- A.2 This document pertains to Company personnel and Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

B. CONTENTS

C. POLICY

- C.1 General
- C.2 Bulk Storage Tanks
- C.3 Facility Drainage
- C.4 Transfer Operations, Pumping, and In-Plant/Station Process
- C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack

D. PROCEDURE

- D.1 Identifying, Containing and Initial Reporting of a discharge or Spill of a Hazardous or Toxic Substance
- D.2 Submitting Written Notification of a Discharge or Spill

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

C. POLICY

C.1 GENERAL

- C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to, fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.



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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

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- C.1.2 Oil, for purpose of this document, means oil of any kind or in any form, including but not limited to petroleum hydrocarbon, fuel oil, Y grade, natural gas liquids, condensate, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) is not considered to be oil.
- C.1.3 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
- a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
  - b. Section 307(a) and Section 311(b) (2) (A) of the Clean Water Act
  - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
  - d. Section 112 of the Clean Air Act
  - e. Section 7 of the Toxic Substance Control Act
- C.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof, and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the applicable federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
- a. Non-Transportation Related Facilities
    - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.



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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

- (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.

b. Transportation Related Facilities

- (1) All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.

C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.

C.1.8 The facility superintendent is responsible for spill prevention. His/her duties include, but are not limited to, the following:

- a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
- b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
- c. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.

C.1.9 Each individual facility is checked annually by the superintendent or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:

- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.
- b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.



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- c. An annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.

C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at regular scheduled intervals for accumulation of oil or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the oil or substance stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.

C.2.2 The facility superintendent should evaluate tank level monitoring requirements to prevent tank overflow.

C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.

C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

C.3 FACILITY DRAINAGE

C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from diked areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.

C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.



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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

- C.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.
- C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:
- a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation, or displacement by foreign materials.
  - b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.
  - c. Any dike three feet or higher should have a minimum cross section of two feet at the top.
- C.3.5 Other means of containment or spill control include, but are not limited to:
- a. Berms or retaining walls;
  - b. Curbing;
  - c. Culverting, gutters, or other drainage systems;
  - d. Weirs, booms, or other barriers;
  - e. Spill diversion ponds or retention ponds;
  - f. Sorbent materials
- C.4 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT/STATION PROCESS
- C.4.1 Aboveground valves and pipelines should be examined regularly by operating personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks, and metal surfaces.
- C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK
- C.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.



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- C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets which may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

**NOTE: LPG loading facilities and remote field loading of condensate are exempt from the C.5 requirements of this document.**

D. PROCEDURE

D.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of Oil or Hazardous Substance

Any Employee

- D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity initiates immediate containment procedures and notifies facility superintendent.

NOTE: Refer to Attachment A for containment procedures.

Facility Superintendent

- D.1.2 Contacts Gas Control and responsible Director immediately by telephone and provides the following information:
- Name of company facility and/or location of facility and nature of discharge or spill
  - Description and quantity of emission or substance discharged
  - Description of the circumstances causing the discharge or spill
  - Name, title, and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
  - Action taken or being taken to mitigate and correct discharge or spill
  - Water bodies or streams involved
  - Time and duration of discharge or spill
  - Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)



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Gas Control Personnel

D.1.3 Advises Environmental Affairs departments immediately by telephone concerning the incident including any incidents reported by persons not employed with the Company.

NOTE: If Gas Control is contacted by a person not employed with the Company, the necessary information is obtained as indicated in D.1.2 and the Superintendent and Environmental Affairs are immediately contacted to begin containment and clean-up of the discharge or spill.

D.1.4 If Environmental Affairs cannot be contacted, notifies Director over Environmental Affairs.

Facility Superintendent

D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.

D.1.6 If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).

D.1.7 Advises Environmental Affairs by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

Environmental Affairs

D.1.8 Assesses reporting requirements to state and federal agencies (contacts Legal Department and Right-of-Way Department, if appropriate). (See Emergency Operating Procedure Manuals).

D.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.

D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Superintendent

D.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the



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following:

- a. Time and date of discharge or spill
- b. Facility name and location
- c. Type of material spilled
- d. Quantity of material spilled
- e. Area affected
- f. Cause of spill
- g. Special circumstances
- h. Corrective measures taken
- i. Description of repairs made
- j. Preventative measures taken to prevent recurrence.

D.2.2 Forwards the completed written description to Environmental Affairs.  
Retains a copy for future reference.

**NOTE: Environmental Affairs, in coordination with the Legal Department, if necessary, submits written reports to government agencies.**



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ATTACHMENT A

DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS

TYPE OF FACILITY WHERE THE DISCHARGE OR SPILL OCCURS	CONTAINMENT PROCEDURES	MATERIALS USED FOR CONTAINMENT
A. Oil Pipeline (as defined in C.1.4)	<ol style="list-style-type: none"> <li>1. Closes appropriate block valves.</li> <li>2. Contains Discharge or spill by: Ditching covering, applying sorbents, constructing an earthen dam, or burning.</li> <li>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</li> </ol>	<ol style="list-style-type: none"> <li>1.Straw</li> <li>2.Loose Earth</li> <li>3.Oil Sorbent 3M Brand</li> <li>4.Plain Wood chips</li> <li>5.Sorb-Oil Chips Banta Co.</li> <li>6.Sorb-Oil Swabs Banta Co.</li> <li>7.Sorb-Oil Mats Banta Co.</li> <li>8.Or Equivalent Materials</li> </ol>
B. Vehicle	<ol style="list-style-type: none"> <li>1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, apply sorbents, or burning.</li> <li>2. Notifies immediately the Safety and Environmental Department and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials.</li> <li>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</li> </ol> <p>Note: Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.</p>	
C. Bulk Storage Tanks	1. Contains discharge or spill by:	



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or any other Facilities	ditching, covering, applying sorbents, constructing an earthen dam, or burning. 2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	
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NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

November 12, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-274-520-547**

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

**RE: Discharge Plan Renewal GW-182  
Williams Field Services  
Navajo CDP Compressor Station  
San Juan County, New Mexico**

Dear Ms. Deklau:

The ground water discharge plan renewal GW-182 for the Williams Field Services Navajo CDP 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 discharge plan as approved February 21, 1995, approved modification dated, April 25, 1995, approved modification dated, July 7, 1995 and renewal application dated, September 22, 1999. 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 10 working days of receipt of this letter.**

The discharge plan renewal application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F, which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

Ms. Ingrid Deklau  
GW- 182 Navajo CDP Compressor Station  
November 12, 1999  
Page 2

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

Pursuant to Section 3109.G.4., this renewal plan is for a period of five years. This renewal will expire on **February 21, 2005**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

The discharge plan renewal application for the Williams Field Services Navajo CDP Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of \$50. There is a renewal flat fee assessed for compressor stations with horsepower greater than 3,000 horsepower equal to one-half of the original flat fee or \$690.00. The OCD has received the filing fee.

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

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf  
Attachment

xc: OCD Aztec Office

Z 274 520 547 *OCD*

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

Sent to	<i>I. Deklau</i>
Street & Number	<i>W. S. J.</i>
Post Office, State, & ZIP Code	<i>...</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>GW-182</i>

PS Form 3800, April 1995

Fold at line over top of envelope  
the right of the return

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

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9-21-99,  
or cash received on \_\_\_\_\_ in the amount of \$ 50.00

from Williams Field Services

for Navajo CS GW-182

Submitted by: [Signature] Date: 9-28-99

Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

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

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

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

Organization Code 521.07 Applicable FY 2000

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.

COMMUNITY NATIONAL BANK  
OKMORCH, OK 73762

WILLIAMS FIELD SERVICES COMPANY

1800 South Baltimore Avenue, P.O. Box 845, Tulsa, OK 74101-0845

44-335

1051

DATE: 09/21/1999

PAY TO THE ORDER OF:

PAY →

\*\*\*\*\*\$50.00

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

SANTA FE  
United States

NM 87504

VOID AFTER 180 DAYS

[Signature]

Authorized Signer

MA-1353 (6/97)

[REDACTED]

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
9-17-99, NAVAJO CDP	19990	0018724-SLC099907010	<p style="text-align: center;"><i>GW-182</i></p>	50.00

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
[REDACTED]	09/21/1999	40665	NEW MEXICO OIL CONSERVATION DI	\$50.00

# AFFIDAVIT OF PUBLICATION

Ad No. 41855

STATE OF NEW MEXICO  
County of San Juan:

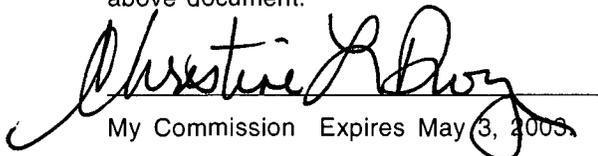
ALETHIA ROTH LISBERGER, being duly sworn says: That she is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Monday, October 11, 1999

and the cost of publication is:\$75.60



On 10/14/99 ALETHIA ROTH LISBERGER appeared before me, whom I know personally to be the person who signed the above document.

  
My Commission Expires May 3, 2003.

## COPY OF PUBLICATION

918 Legals

### 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, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-182) - Williams Field Services, Ingrid A. Deklau, (801) 584-6543, P.O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan renewal application for the Navajo CDP Compressor Station located in the NE/4 NW/4 of Section 2, Township 30 North, Range 8 West, NMPM, San Juan county, New Mexico. After oil/water separation, approximately 42 gallons per day of process waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Ground water most likely to be affected in the event of an accidental discharge is at a depth of 20 feet with a total dissolved solids concentration of approximately 2000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application(s) may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan application(s), the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. 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 there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1st day of October 1999.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

/s/ Roger Candelaria  
for LORI WROTENBERY, Director

SEAL

Legal No. 41855, published in The Daily Times, Farmington, New Mexico, Monday, October 11, 1999.

# The Santa Fe New Mexican

Since 1849 We Read You

OCT 12 1999

NM OIL CONSERVATION DIVISION  
ATTN: LUPE SHERMAN  
2040 S. PACHECO ST.  
SANTA FE, NM 87505

OIL CONSERVATION DIVISION

AD NUMBER: 112324 ACCOUNT: 56689  
LEGAL NO: 66199 P.O.#: 00199000278  
174 LINES 1 time(s) at \$ 76.60  
AFFIDAVITS: 5.25  
TAX: 5.12  
TOTAL: 86.97

## AFFIDAVIT OF PUBLICATION

### NOTICE OF PUBLICATION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1st day of October, 1999.

STATE OF NEW MEXICO  
OIL CONSERVATION  
DIVISION  
LORI WROTENBERY,  
Director

Legal #66199  
Pub. October 7, 1999

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

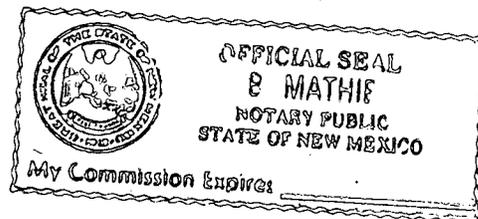
I, Betty Perner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #66199 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/07/1999 and 10/07/1999 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 7 day of October, 1999 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ Betty Perner  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
6 day of October A.D., 1999

Notary B Mathie

Commission Expires 3-13-2001



**NOTICE OF PUBLICATION**

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1st day of October 1999.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
LORI WROTENEERY, Director

SEAL

P 326 937 133

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

Sent to Daily Times  
Street & Number P.O. Box 450  
Post Office, State, & ZIP Code Farmington, NM 87409

Postage \$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing Whom & Date Delivered

Return Receipt Showing Whom, Date, & Addressee's Address

TOTAL Postage & Fees OCT 5 1999

Postmark or Data

OCT JACK FORD 6W-182

PS Form 3800 April 1995





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

August 23, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-274-520-526**

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

**RE: Discharge Plan GW-182 Renewal  
Navajo CDP Compressor Station  
San Juan County, New Mexico**

Dear Ms. Deklau:

On February 21, 1995, the groundwater discharge plan renewal, GW-182, for the Williams Field Services Navajo CDP Compressor Station located in the NE/4 NW/4 of Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. **The approval will expire on February 21, 2000.**

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed. **Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether Williams Field Services has made or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the **Navajo CDP Compressor Station** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50.00 plus a flat fee equal to one-half of the original flat fee for compressor stations with horsepower greater than 3000 horsepower. The \$50.00 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

Ms. Ingrid A. Deklau  
August 23, 1999  
Page 2

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (Copies of the WQCC regulations and discharge plan application form and guidelines are enclosed to aid you in preparing the renewal application. A complete copy of the regulations is also available on OCD's website at [www.emnrd.state.nm.us/oed/](http://www.emnrd.state.nm.us/oed/)).

If the Trunk L Compressor Station no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services Company has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 827-7156.

Sincerely,

  
Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf

enclosed: Discharge Plan Application form

cc: OCD Aztec District Office

Z 274 526 526 OCD  
Ford

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

Sent to	I. Deklau
Street & Number	WFS
Post Office, State, & ZIP Code	SLC
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing Whom & Date Delivered	
Return Receipt Showing to Whom Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	\$
Postmark or Date	6W-182

PS Form 3800, April 1995

*(Circular postmark: SANTA FE, NM AUG 30 1999)*



**FIELD SERVICES**

October 16, 1997

Mr. Mark Ashley  
New Mexico Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

**Re: Installation of Temporary Tanks: GW-122, GW-155, GW-134, GW-133, GW-182**

Dear Mr. Ashley:

We are currently in the process of evaluating disposal options for a liquid waste stream consisting of condensate from the glycol dehydrator and compressor washdown water. At some of our facilities, these two liquid waste streams are piped to a single tank. San Juan 29-6 #4 (GW-122) has been chosen as a consolidation point for this waste stream while we conduct our evaluation. Therefore, five 400-barrel frac tanks have been temporarily installed at the site for storage of the liquid waste stream from facilities. Additionally, there are two evaporators temporarily operating at the site. The evaporators are currently evaporating a total of approximately 150 bbl per day of the waste water. Berms have been installed around all of the aforementioned equipment.

Another part of our evaluation includes consideration of whether to permanently segregate the waste streams. To prevent further generation of this mixed waste stream during our analysis, we anticipate installing temporary tanks at the following facilities:

- One temporary 400-barrel tank at Aztec CDP Compressor Station (GW 155)
- One temporary 400-barrel tank at Decker Junction Compressor Station (GW 134)
- One temporary 400-barrel tank at San Juan 30-8 #1 Compressor Station (GW 133)
- One temporary 400-barrel tank at Navajo CDP Compressor Station (GW 182)

Condensate would be routed to the temporary tanks for storage; washdown water would continue to be stored in the existing tank at the facility. Berms will be installed at each of the tanks that will be in place for more than 30 days. We will keep you informed on the progress of this evaluation, and on any permanent changes made to the aforementioned sites.

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

Sincerely,

Ingrid A. Deklau  
Senior Environmental Specialist

November 26, 1996

NOV 26 1996 10 52

Mr. Patricio Sanchez  
New Mexico Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87505

**RE: Replacement of Fiberglass Wastewater Sumps**

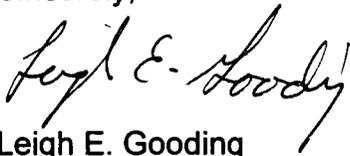
Dear Mr. Sanchez:

This letter is to provide notification of the removal and replacement of fiberglass sumps at the following Williams Field Services locations:

29-6#3 CDP:	December 2-6
29-7 CDP:	December 9-13
Navajo CDP:	December 18-22

This schedule is subject to change dependent on weather and road conditions. If you have any questions or need additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,



Leigh E. Gooding  
Sr. Environmental Specialist

cc: Mr. Denny Foust

**RECEIVED**

DEC 03 1996

Environmental Bureau  
Oil Conservation Division

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

October 1, 1996

008 11 8 52

Mr. William LeMay  
New Mexico Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87504

**RECEIVED**

OCT 3 1996

Environmental Bureau  
Oil Conservation Division

Dear Mr. LeMay:

Williams Field Services (WFS) has identified a quality control problem in the below-grade fiberglass sumps recently installed at several WFS compressor stations. Following removal of the fiberglass sump at WFS' La Jara Compressor Station, (notification letter to NMOCD dated September 5, 1996) WFS discovered that the sump did not meet WFS' specifications. During routine monthly leak inspections, WFS detected liquid in the detection port of the sumps at the following four (4) compressor stations:

29-6 #3 CDP (GW-198)  
29-7 CDP (GW-136)  
La Cosa CDP (GW-187)  
Navajo CDP (GW-182)

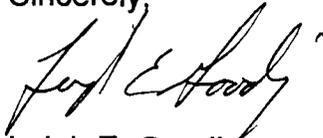
The La Cosa sump was immediately removed upon detection of the liquid in the outer sump. The sump was visually inspected and the outer wall was found to be intact. To date, the sump at La Cosa has not been permanently replaced.

WFS is in the process of securing a vendor to supply replacement sumps. Once a vendor is selected, WFS will remove and replace all of the failed sumps. Upon removal, the sumps will be visually inspected. If the integrity of the outer wall has been breached, the surrounding soil will be excavated and confirmation samples will be collected from the walls of the excavation. Soil samples will be analyzed for total petroleum hydrocarbons (TPH). WFS will notify Mr. Denny Foust of the NMOCD Aztec office prior to each tank removal to allow NMOCD to have a representative on site. Weather permitting, WFS plans to replace all failed tanks within the next 90 days.

WFS' Trunk A (GW-243), Trunk B (GW-249), and Trunk C (GW-257) Booster Stations are currently under construction. At these sites, the below-grade sumps will be placed in concrete vaults.

If you require any additional information, please feel free to contact me at (801) 584-6543.

Sincerely,



Leigh E. Gooding  
Sr. Environmental Specialist

cc: Denny Foust, NMOCD Aztec Office  
Jim West, MND  
Dave Sanders, KUT

**RECEIVED**

OCT 3 1996

Environmental Bureau  
Oil Conservation Division

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9/15/95,  
or cash received on 9/25/95 in the amount of \$ 690.00  
from Williams Field Services  
for Navajo CDP GW-182

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Submitted to ASD by: Rog. Anderson Date: 9/26/95  
Received in ASD by: Angie Albre Date: 9/26/95

Filing Fee \_\_\_\_\_ New Facility  Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

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

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

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

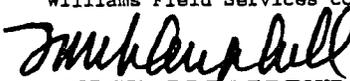
DATE	CHECK NO.	NET AMOUNT
09/15/95	[REDACTED]	690.00

PAY  
SIX HUNDRED NINETY AND 00/100-----

TO THE  
ORDER  
OF

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

Williams Field Services Company

  
VICE PRESIDENT  
AUTHORIZED REPRESENTATIVE

Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT

09/15/95

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
22195	COMPRS STAT. HORSE <i>Nauajo COP -</i> <i>GW-182</i>	02/21/95	690.00	0.00	690.00
			690.00	0.00	690.00

PLEASE DETACH BEFORE DEPOSITING

## OIL CONSERVATION DIVISION

July 7, 1995

CERTIFIED MAILRETURN RECEIPT NO.P-176-012-156

Ms. Leigh Gooding  
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 Ms. Gooding:

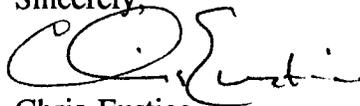
The Oil Conservation Division (OCD) has received Williams Field Services, Inc.'s (WFS) Discharge Plan Update, dated May 24, 1995, for the above referenced facility. The document contains the details of the facility "as built" stating that four (4) compressors, instead of the originally permitted ten (10), were installed. This is an update to the original plan submitted November 16, 1994 and approved February 21, 1995.

The facility is still permitted for ten (10) compressors for the duration of the plan. Should WFS decide to install up to, and including, 10 compressors, this would require WFS to send another update to the OCD.

Please be advised that OCD approval does not relieve WFS of liability should their operation result in pollution of the ground water, surface water or the environment. In addition, this approval does not relieve WFS of responsibility for compliance with other federal, state or local laws and/or regulations.

If you have any questions, please don't hesitate to call me at (505) 827-7153.

Sincerely,



Chris Eustice  
Environmental Geologist

xc: Denny Foust, OCD Aztec Office

'95 MAY 30 AM 8 52

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

May 24, 1995

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

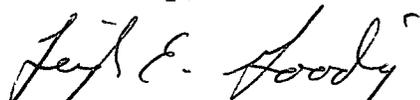
Re: Discharge Plan Update for Navajo CDP Compressor Station in San Juan County, New Mexico (GW-180).

Dear Mr. Anderson:

Attached, please find two copies of the Discharge Plan Revision for Williams Field Services' Navajo CDP Compressor Station. The original plan was approved on February 21, 1995 (GW-180). This revision addresses the facility design change from ten (10) compressor unit to four (4) compressor units and is consistent with the facility's air quality permit (No. 1589) issued May 1, 1995.

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

Sincerely,



Leigh E. Gooding, P.G.  
Environmental Specialist

attachment

cc: Mr. Denny Foust, District III Office

**WILLIAMS FIELD SERVICES**  
**NAVAJO CDP COMPRESSOR STATION DISCHARGE PLAN REVISION**  
**May 1995**

**I. BACKGROUND INFORMATION**

On November 8, 1994, Williams Field Services (WFS) submitted a Discharge Plan for Navajo CDP Compressor Station to the New Mexico Oil Conservation Division (OCD) for review and approval. Navajo CDP Compressor Station is located in the NW/4 of the NE/4 of Section 2 (please note correction), Township 30 North, Range 8 West, San Juan County, New Mexico. The plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. The plan, GW-182, was subsequently approved by OCD on February 21, 1995. A revision was submitted in March 1995 for the addition of a below-grade sump. The revision was approved by OCD April 25, 1995.

According to the terms of the Discharge Plan, WFS is required to notify the Director of the OCD of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. This update addresses proposed modifications at Navajo CDP Compressor Station.

**II PROPOSED MODIFICATIONS**

Williams Field Services proposes to install four (4) Waukesha 12V-AT27GL 3130 HP (2916 site HP) natural gas reciprocating engines instead of ten (10) 1,055 HP natural gas fired compressor units as originally proposed. A revised site plan is attached. No new liquid wastes are expected to be generated by the proposed modification.

**III SUMMARY**

No new or additional liquid wastes will be generated by the proposed modification at this facility. All liquid wastes will be handled in accordance with the approved OCD Discharge Plan (GW-182), the March 1995 revision, and this revision.

**IV AFFIRMATION**

I hereby certify that I am familiar with the information contained in and submitted with this revision and that such information is true, accurate, and complete to the best of my knowledge and belief.

  
\_\_\_\_\_  
Signature

Terry G. Spradlin

5-24-95  
\_\_\_\_\_  
Date

Manager, Environmental, Health  
& Safety



**WILLIAMS FIELD SERVICES  
NAVAJO CDP COMPRESSOR STATION DISCHARGE PLAN REVISION  
May 1995**

**I. BACKGROUND INFORMATION**

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**IV AFFIRMATION**

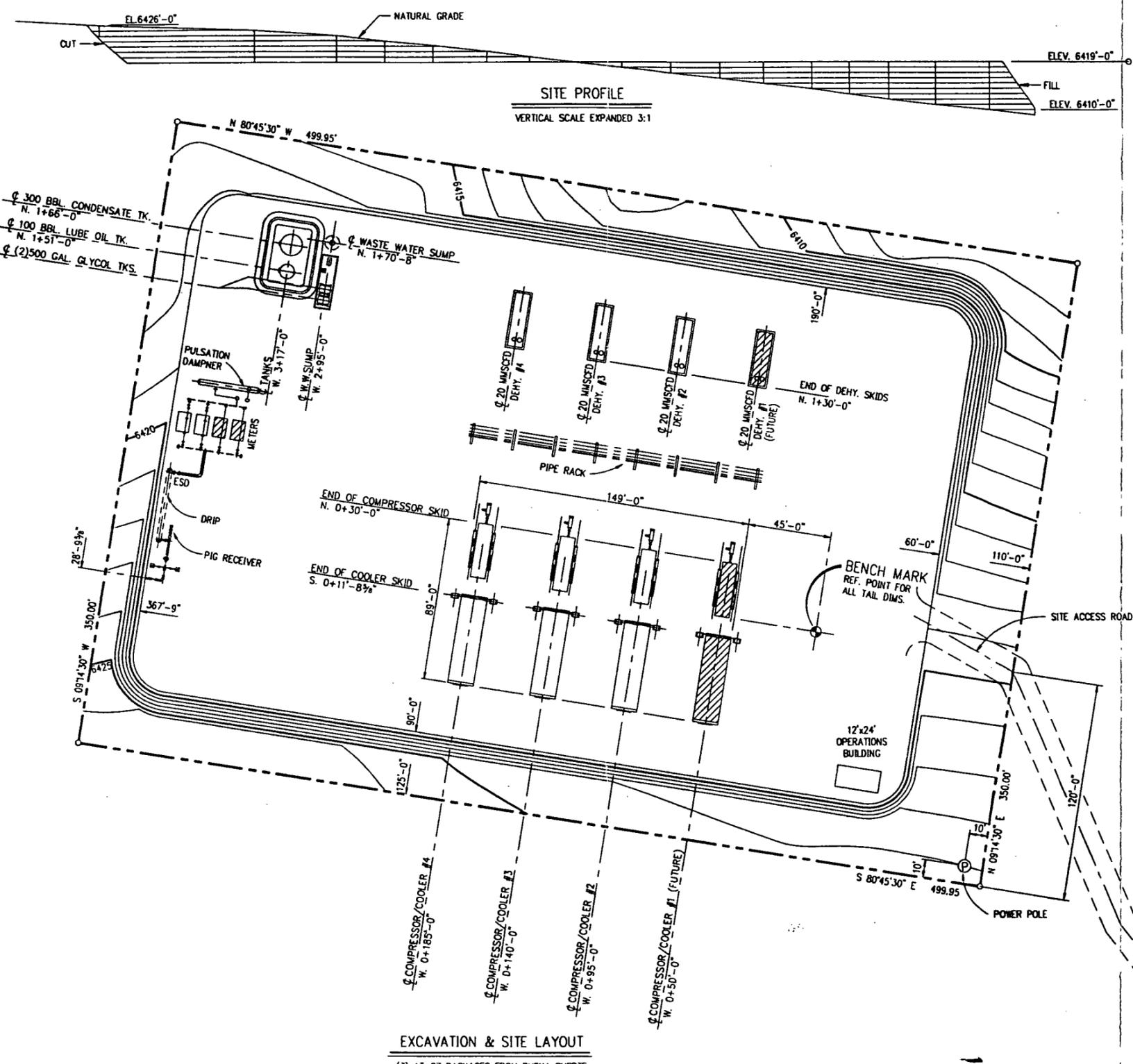
I hereby certify that I am familiar with the information contained in and submitted with this revision and that such information is true, accurate, and complete to the best of my knowledge and belief.

  
\_\_\_\_\_  
Signature

Terry G. Spradlin

5-24-95  
Date

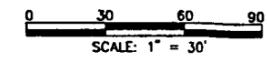
Manager, Environmental, Health  
& Safety



**SITE PROFILE**  
VERTICAL SCALE EXPANDED 3:1

**EXCAVATION & SITE LAYOUT**

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



**WILLIAMS FIELD SERVICES**  
ONE OF THE WILLIAMS COMPANIES  
NAVAJO C.D.P.  
EXCAVATION & SITE LAYOUT

DRAFTING		BY	DATE
DRAWN		JER	01/09/95
CHECKED		JK	
APPROVED			
ENGINEERING		BY	DATE
C & S REVIEW			
PROJECT APPROVED			
PLOT DATE/TIME		3/3/1995 2:09 P.M.	

SCALE: 1" = 30'  
W.O. # 11373  
DWG. NO. NAV-1-M1

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



STATE OF NEW MEXICO  
 ENERGY, MINERALS AND NATURAL RESOURCES

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

April 25, 1995

P 176 012 131



Receipt for  
 Certified Mail  
 No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-176-012-131**

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

**RE: Discharge Plan GW-182**  
**Navajo CDP Compressor Station**  
**San Juan County, New Mexico**

Dear Ms. Gooding:

The Oil Conservation Division (OCD) has received Williams Field Services' (Williams) request dated March 17, 1995 to install a below grade sump at the above referenced facility. The request includes the plan and specifications for installation of the sump.

Based on the information provided, the OCD hereby approves the installation of the sump under the following conditions:

1. **Leak Detection Schedule:** The leak detection system will be checked at a minimum of monthly. The date of inspection, results, and inspectors initials will be recorded and kept at the facility and available for OCD inspection.
2. **Leak Notification:** Any leaks or overflows will be reported to the OCD within 24 hours of discovery.

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

If you have any questions do not hesitate to contact me at (505) 827-7153.

Sincerely,  
  
 Chris Eustice  
 Environmental Geologist

xc: Denny Foust, OCD Aztec Office

PS Form 3800, June 1991

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

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

'95 MAR 27 PM 8 52

March 24, 1995

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

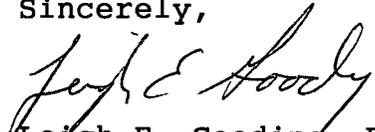
Re: Site Plan for Navajo CDP Compressor Station - San Juan County

Dear Mr. Anderson:

Enclosed please find three copies of the site plan for Williams Field Services' Navajo CDP Compressor Station located in San Juan County, New Mexico. A Discharge Plan was submitted for this site (GW-182), but the engineering drawings were not available at the time of submittal.

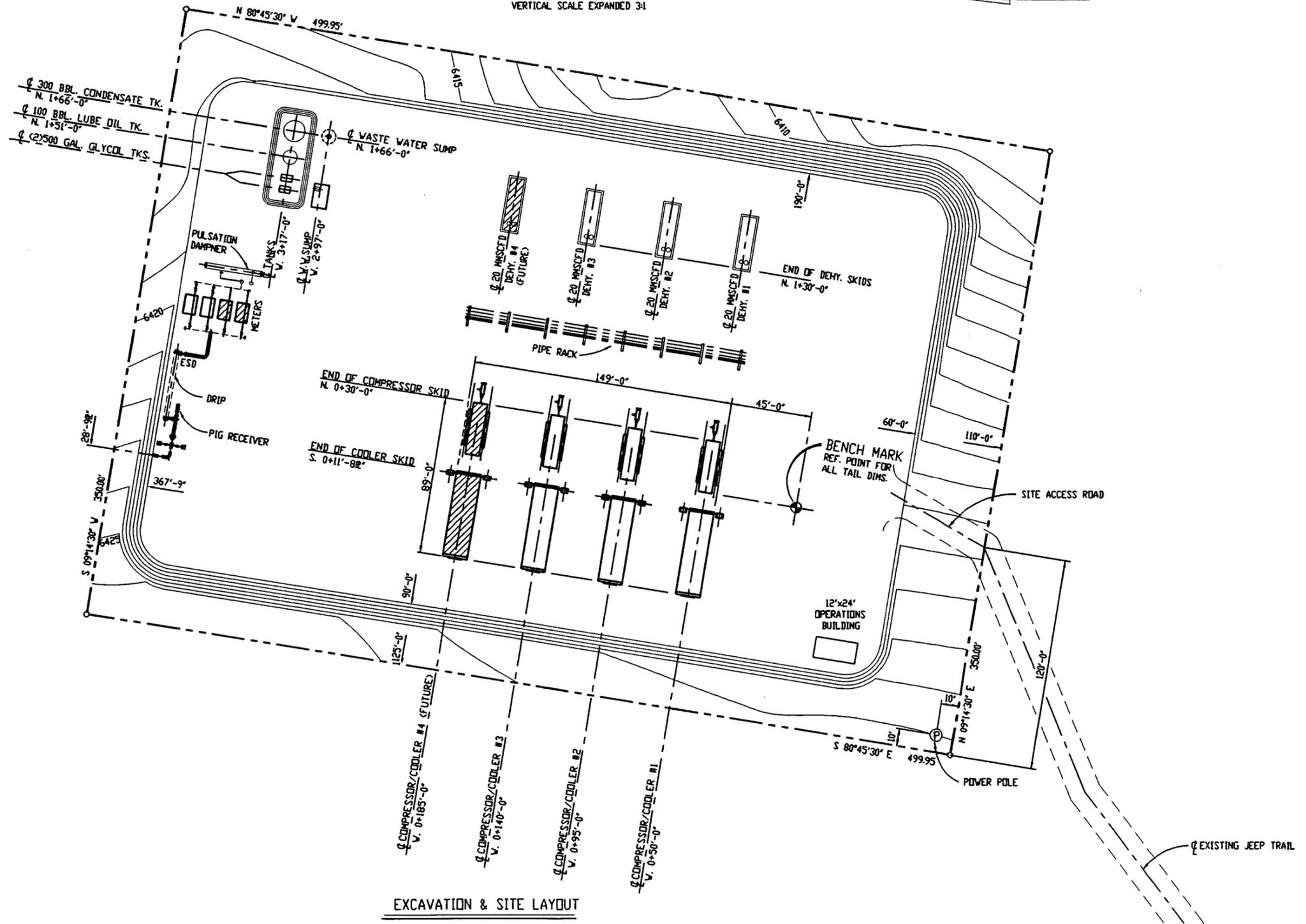
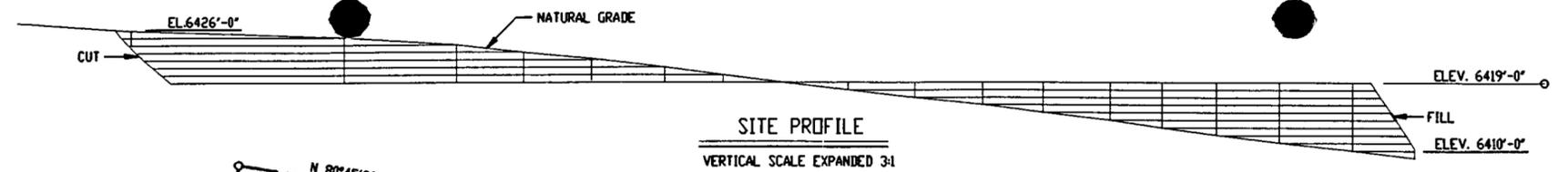
If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

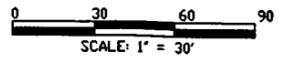


Leigh E. Gooding, P.G.  
Environmental Specialist

Enclosures



**EXCAVATION & SITE LAYOUT**  
 (3) AT-27 PACKAGES FROM BUENA SUERTE  
 (3) 20 MMSCFD GAS DEHYDRATORS



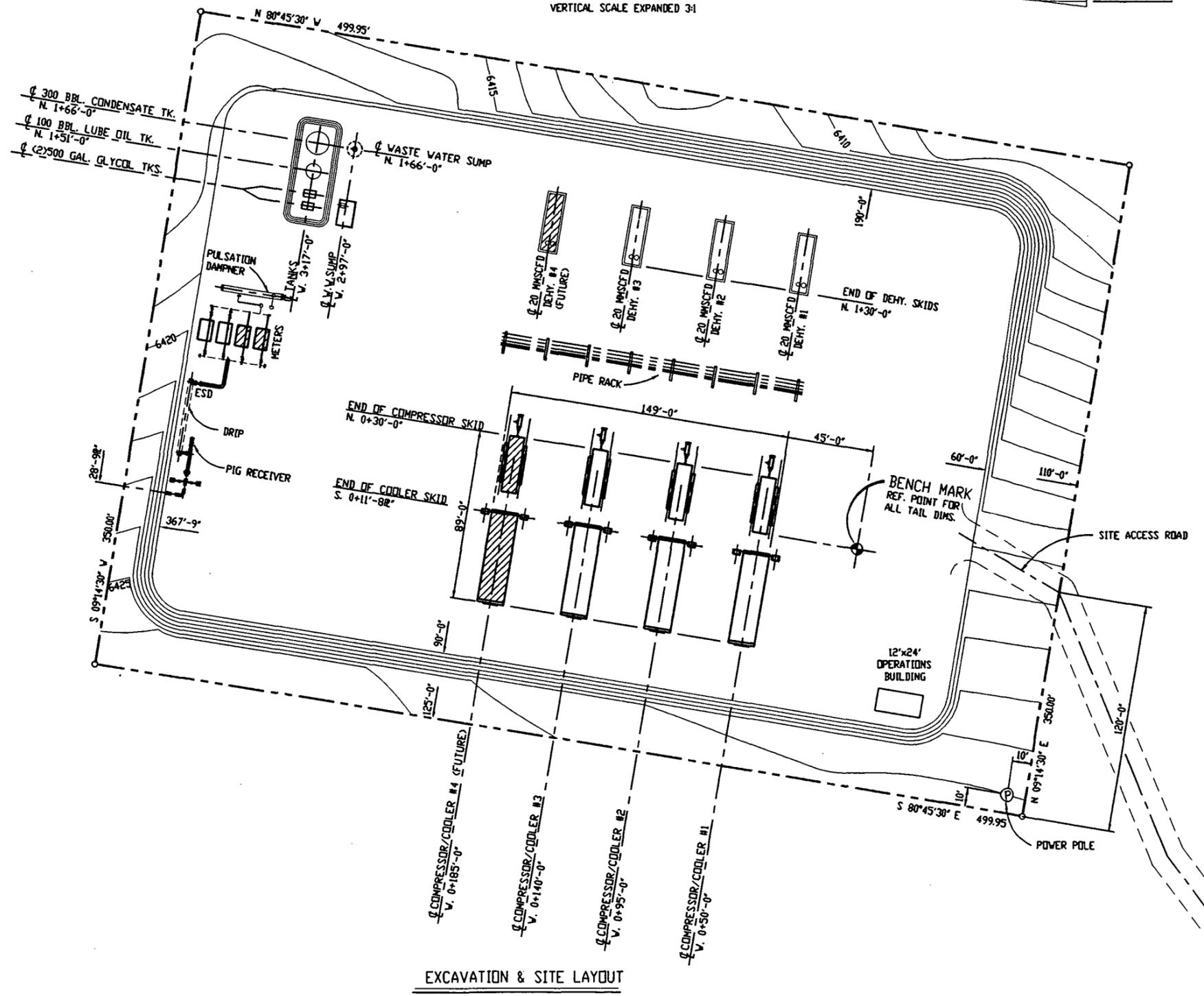
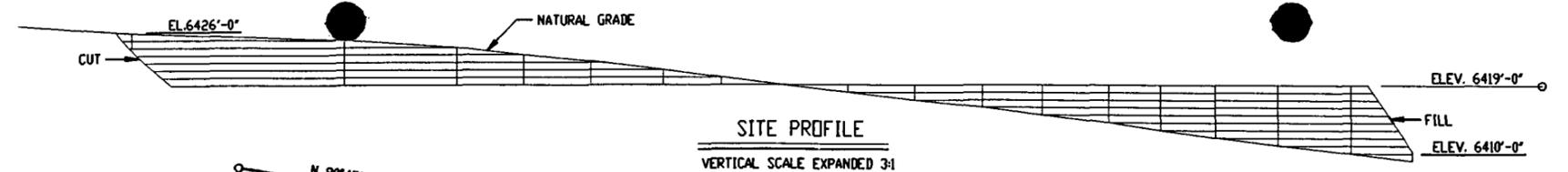
**WILLIAMS FIELD SERVICES**  
 ONE OF THE WILLIAMS COMPANIES  
 NAVAJO C.D.P.  
 SAN JUAN COUNTY, NEW MEXICO  
 EXCAVATION & SITE LAYOUT

DRAFTING		BY	DATE
DRAWN		JER	01/09/95
CHECKED		JK	
APPROVED			
ENGINEERING		BY	DATE
C & S REVIEW			
PROJECT APPROVED			
PLOT DATE/TIME		3/21/1995 5:14 P.M.	

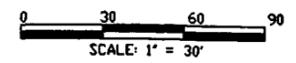
  

NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
REVISIONS					

SCALE: 1" = 30'  
 W.O. #  
 DWG. NO. NAV-1-M1



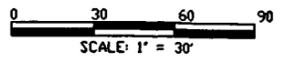
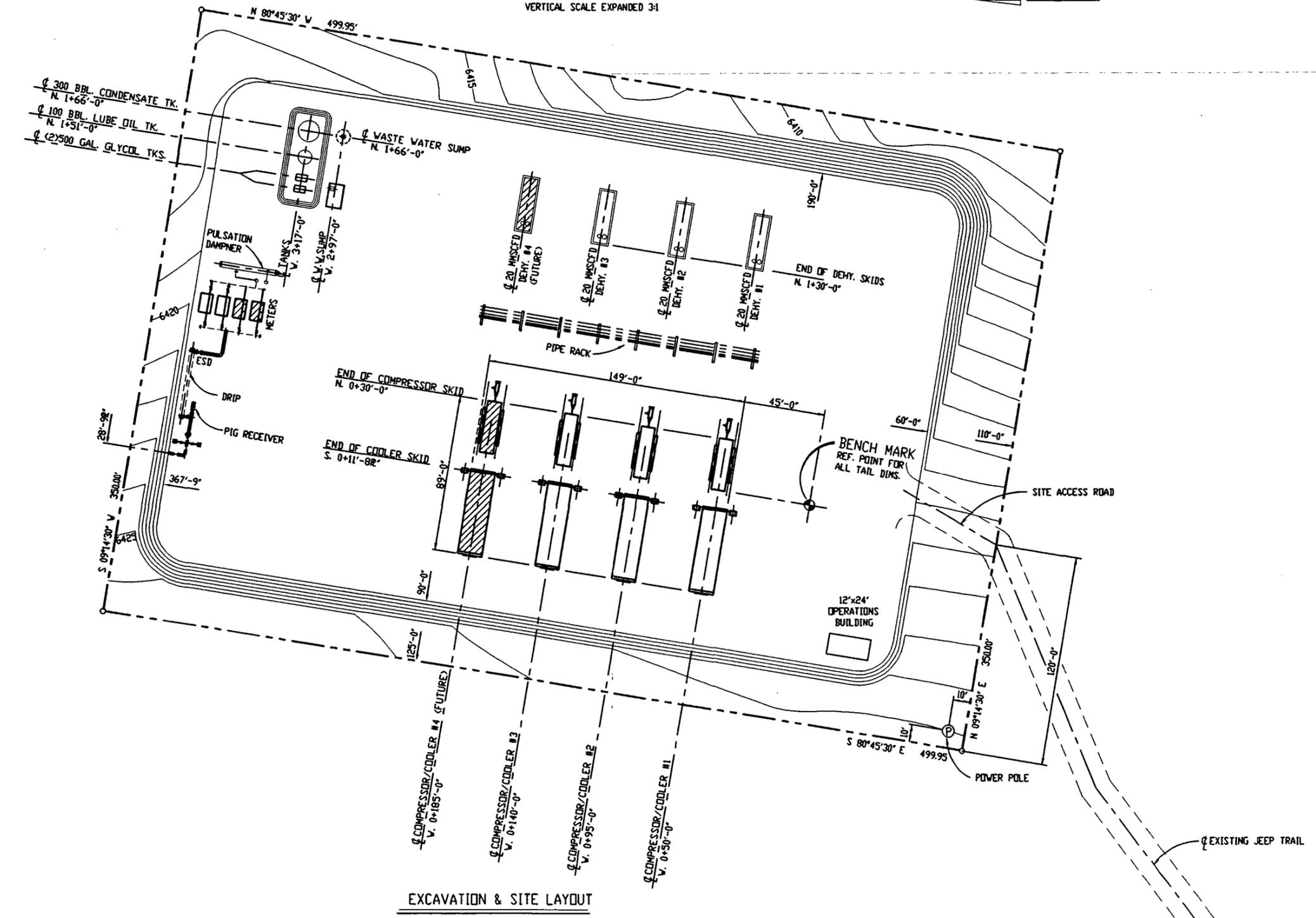
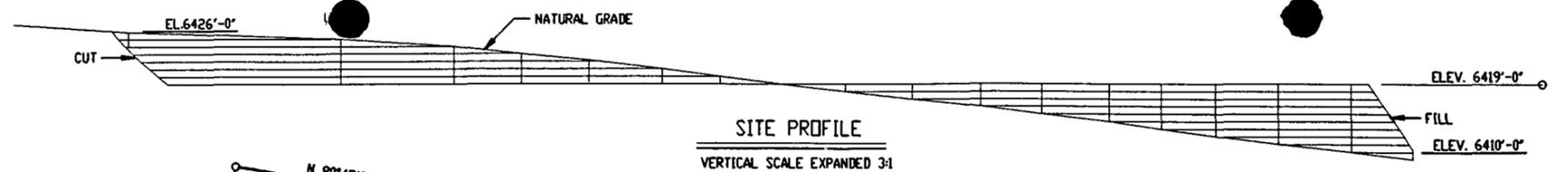
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 (3) AT-27 PACKAGES FROM BUENA SUERTE  
 (3) 20 MMSCFD GAS DEHYDRATORS



**WILLIAMS FIELD SERVICES**  
 ONE OF THE WILLIAMS COMPANIES  
 NAVAJO C.D.P.  
 SAN JUAN COUNTY, NEW MEXICO  
 EXCAVATION & SITE LAYOUT

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REVISIONS					
PLOT DATE/TIME 3/21/1995 114 P.M.					

SCALE: 1" = 30'  
 W.O. #  
 DWG. NO. NAV-1-M1



**EXCAVATION & SITE LAYOUT**  
 (3) AT-27 PACKAGES FROM BUENA SUERTE  
 (3) 20 MMSCFD GAS DEHYDRATORS



**WILLIAMS FIELD SERVICES**  
 ONE OF THE WILLIAMS COMPANIES  
 NAVAJO C.D.P.  
 SAN JUAN COUNTY, NEW MEXICO  
 EXCAVATION & SITE LAYOUT

DRAFTING		BY	DATE
DRAWN		JER	01/09/95
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APPROVED			
ENGINEERING		BY	DATE
C & S REVIEW			
PROJECT APPROVED			
PLOT DATE/TIME		2/21/1995 1:42 P.M.	

NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
REVISIONS					

SCALE: 1" = 30'  
 W.O. #  
 DWG. NO. NAV-1-M1



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

OIL CONSERVATION DIVISION  
RECEIVED

'95 MAR 21 PM 8 52

March 17, 1995

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

Re: Discharge Plan Update for Navajo CDP Compressor Station in San  
Juan County, New Mexico.

Dear Mr. Anderson:

Attached, please find an update to the Discharge Plan for Williams Field Services' Navajo CDP Compressor Station. The original plan was approved on February 21, 1995 (GW-182). This update addresses the proposed addition of a below-grade wastewater sump.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Leigh E. Gooding".

Leigh E. Gooding, P.G.  
Environmental Specialist

Attachment

**WILLIAMS FIELD SERVICES**  
**NAVAJO CDP COMPRESSOR STATION DISCHARGE PLAN UPDATE**  
**March 1995**

**I. BACKGROUND INFORMATION**

On November 8, 1994, Williams Field Services (WFS) submitted a Discharge Plan for Navajo CDP Compressor Station to the New Mexico Oil Conservation Division (OCD) for review and approval. Navajo CDP Compressor Station is located in the NE/4 NW/4 of Section 2, Township 30 North, Range 8 West, San Juan County, New Mexico. The plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. The plan, GW-182, was subsequently approved by OCD on February 21, 1995.

According to the terms of the Discharge Plan, WFS is required to notify the Director of the OCD of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. This update addresses proposed modifications at Navajo CDP Compressor Station.

**II PROPOSED MODIFICATIONS**

Williams Field Services proposes to install a below-grade waste water sump at the subject site. The sump will be constructed in accordance with OCD Guidelines for the Selection and Installation of Below-Grade Produced Water Tanks (revised 10/91). Waste water will gravity-drain from concrete containment skids below compressor units and lube oil day tanks to the sump. The sump will consist of a six foot diameter, 740-gallon fiberglass tank set within an eight foot diameter fiberglass tank. A submersible pump equipped with a float control will be placed in the inner tank through a thirty-inch well. Any waste water accumulations will be pumped from the inner tank to an above-ground holding tank. An eight-inch inspection port will be installed within the outer tank for visual inspection. A schematic drawing of the sump is attached.

No new liquid wastes are expected to be generated by the proposed modifications.

**III SUMMARY**

No new or additional liquid wastes will be generated by the proposed modifications at this facility. All liquid wastes will be handled in accordance with the approved OCD Discharge Plan (GW-182) and this revision.

**IV AFFIRMATION**

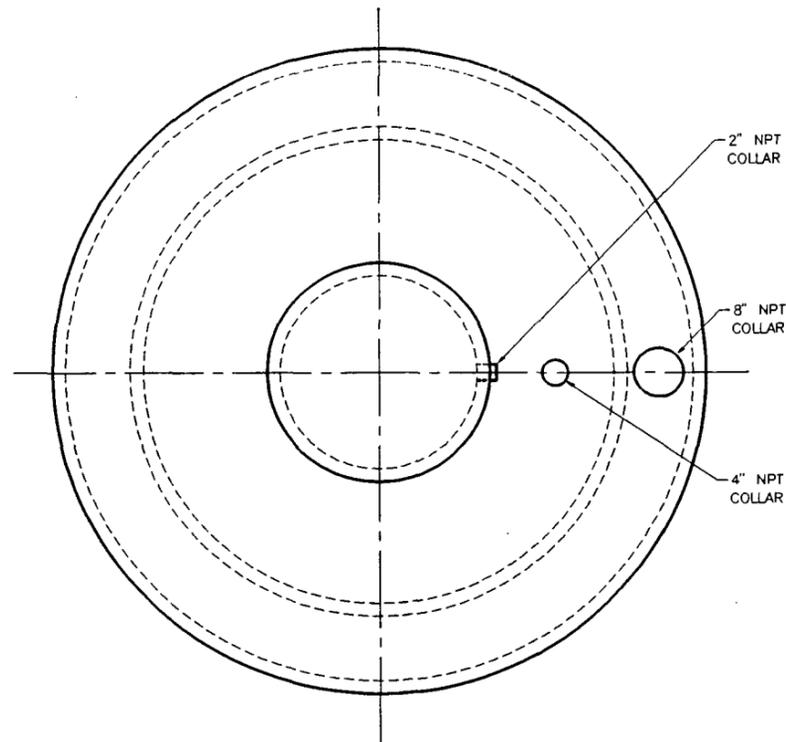
I hereby certify that I am familiar with the information contained in and submitted with this revision and that such information is true, accurate, and complete to the best of my knowledge and belief.

  
\_\_\_\_\_  
Signature

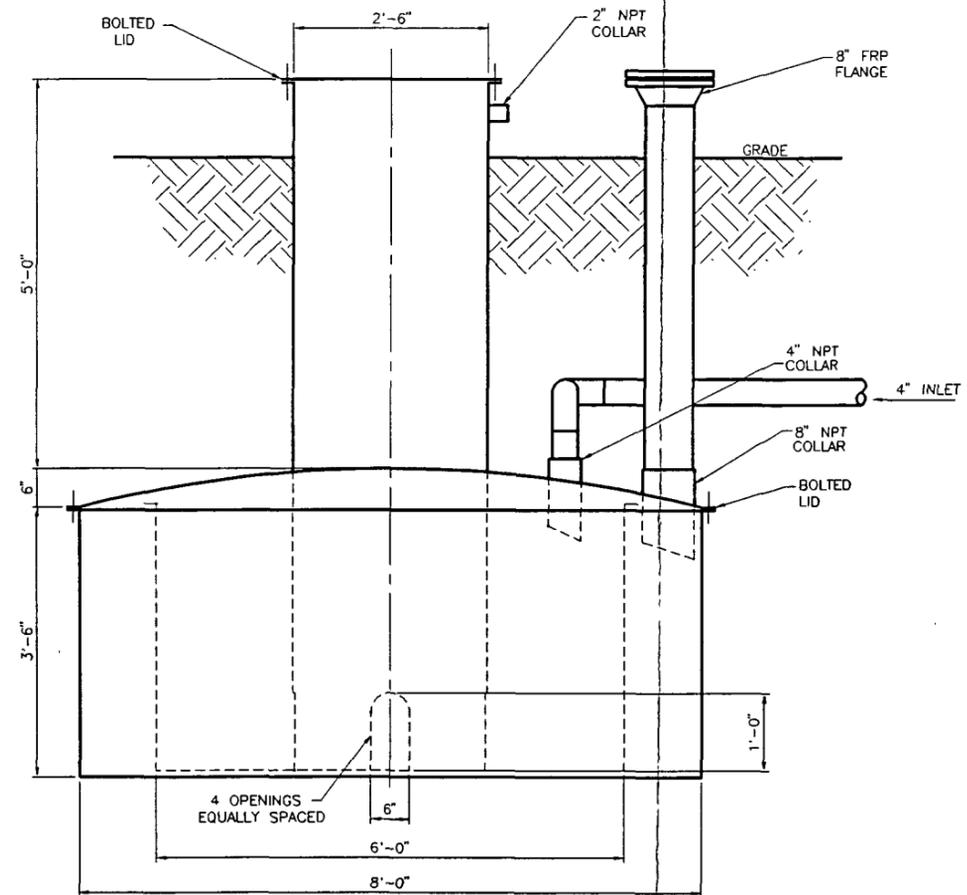
Rob M. Hawksworth

3/12/95  
\_\_\_\_\_  
Date

Director, Shared Services



WASTE WATER SUMP  
PLAN VIEW



WASTE WATER SUMP  
ELEVATION

**PRELIMINARY**

LEGEND										REFERENCE DRAWINGS										REVISIONS										DRAFTING BY DATE DRAWN RJB 03/03/95 CHECKED APPROVED ENGINEERING BY DATE PROJ. APPROVED			WILLIAMS GAS PROCESSING <small>ONE OF THE VOLLING COMPANIES</small> GATHERING SYSTEM STANDARD FIBERGLASS WATER SUMP			SCALE: 1"=1' W.D. NO. 11897		DWG. NO. STD-D-1-4042		REV.
DRAWING NO.	TITLE	DRAWING NO.	TITLE	NO.	DATE	BY	DESCRIPTION	V.D.M.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	V.D.M.	CHK.	APP.	PROJ. APPROVED	SCALE:	DWG. NO.	REV.																			

NOTICE OF PUBLICATION  
STATE OF NEW MEXICO  
ENERGY, MINERALS AND  
NATURAL RESOURCES  
DEPARTMENT

**OIL CONSERVATION DIVISION**  
Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pecos, Santa Fe, New Mexico 87505, Telephone: (505) 827-7131:

(GW-180) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Trunk L compressor station located in the NW/4 SW/4, Section 22, Township 28 North, Range 8 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 48 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-181) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Trunk M compressor station located in the SE/4 NE/4, Section 28, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 12 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-182) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Navajo ODP compressor station located in the SE/4 NW/4, Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 1 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 9:00 a.m. and 4:00 p.m., Monday through Friday.

STATE OF NEW MEXICO  
County of Bernalillo SS

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for one times, the first publication being of the 19th day of Jan, 1995, and the subsequent consecutive publications on none 1995.

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 19th day of Jan, 1995,

CONFIDENTIAL SERIAL

Megan Millage

NOTARY PUBLIC  
STATE OF NEW MEXICO

5/20/98

PRICE \$55.23  
Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER C80932

OK TO PAY. CS

NOTICE OF PUBLICATION

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

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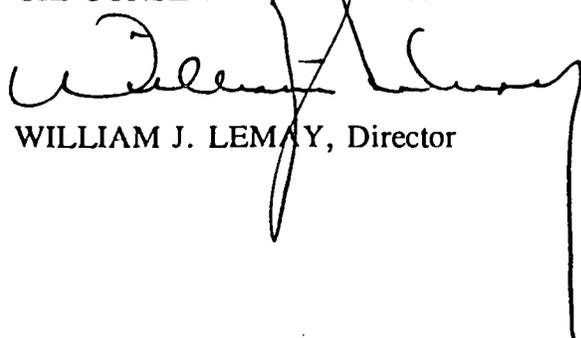
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A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 9th day of January, 1995.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

SEAL

**NO EFFECT FINDING**

The described action will have no effect on listed species, wetlands, or other important wildlife resources.

Date January 27, 1995

Consultation # 2-22-95-I-142

Approved by R. Mark Wilson

U.S. FISH and WILDLIFE SERVICE  
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE  
ALBUQUERQUE, NEW MEXICO

**AFFIDAVIT OF PUBLICATION**

No.34246

STATE OF NEW MEXICO  
County of San Juan:

ROBERT LOVETT being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Thursday, January 19, 1995

and the cost of publication was: \$75.51



On 1/20 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.



My Commission Expires April 22, 1997.

**COPY OF PUBLICATION**

**Legals**

**NOTICE OF PUBLICATION**

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

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 9th day of January, 1995.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

Legal No. 34246 published in The Daily Times, Farmington, New Mexico on Thursday, January 19, 1995.

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

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 9th day of January, 1995.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

(SEAL) (Published January 19, 1995)

**Affidavit of Publication** OIL CONSERVATION DIVISION RECEIVED

NEW MEXICO } ss. Arriba

'95 JAN 25 AM 8:52

Trapp, being first duly sworn, declare and say that I am the Publisher of Rio Grande Sun, a weekly newspaper, published in the English language having a general circulation in the City of Espanola and County of Sandoval, State of New Mexico, and being a newspaper duly qualified to publish notices and advertisements under the provisions of Chapter 167 of the Statutes of 1937; that the publication, a copy of which is hereto attached,

is published in said paper once each week for ..... consecutive weeks, and on the ..... day of each week in the regular issue of the paper during the time ..... and that the notice was published in the newspaper proper, and

in addition, the first publication being on the ..... day of ..... 19<sup>th</sup> Jan. 95 and the last publication on the ..... day of ..... 19<sup>th</sup> Jan. 95;

that payment for said advertisement has been made (or assessed as court costs); that the undersigned has personally read and approved of the matters and things set forth in this affidavit.

Rodney Trapp  
Publisher

Subscribed and sworn to before me this ..... day of ..... A.D., 19<sup>95</sup>

Ruth S. Trapp  
Notary Public

My Commission expires 5-19-97


Printing - SS - Stand Sales

## NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

**(GW-180) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Trunk L compressor station located in the NW/4 SW/4, Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-181) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Trunk M compressor station located in the SE/4 NE/4, Section 29, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 1 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-182) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Navajo CDP compressor station located in the SE/4 NW/4, Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 1 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

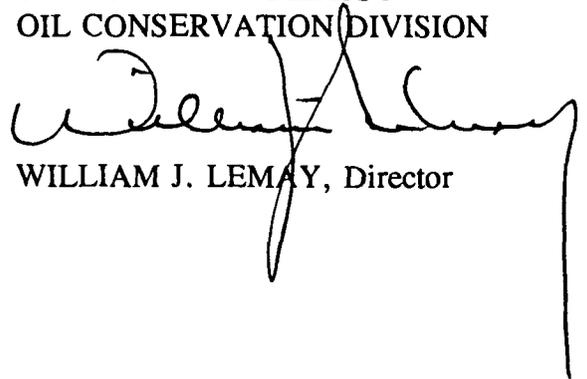
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday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

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 9th day of January, 1995.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read 'William J. Lemay', is written over the typed name. The signature is fluid and cursive, with a long vertical line extending downwards from the end of the name.

WILLIAM J. LEMAY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT  
OF ~~CHECK~~/CASH

I hereby acknowledge receipt of ~~check~~ No. [REDACTED] dated 11/22/94,  
or cash received on \_\_\_\_\_ in the amount of \$ 50.00  
from WILLIAMS FIELD SERVICES CO.  
for NAVAJO CDP COMPRESSION STATION

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_ (DP No.)

Submitted to ASD by: CHRIS E. ICE Date: 12/30/94

Received in ASD by: DM Date: 12/30/94

Filing Fee  New Facility  Renewal

Modification  Other

Organization Code 521.CT Applicable FY 95

To be deposited in the Water ~~Quality~~ Management Fund.

Full Payment  or ~~Increment~~ Increment

THE 2010 UNITED STATES GOVERNMENT PRINTING OFFICE: 2007

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

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

CHECK NO.	NET AMOUNT
[REDACTED]	*****50.00

PAY  
FIFTY AND 00/100 DOLLARS

TO THE ORDER OF  
NEW MEXICO OIL CONSERVATION DIVISION  
310 OIL SANTA FE TRAIL  
STATE LAND OFFICE BUILDING  
SANTA FE, NM 87504

Williams Field Services Company  
Jim Campbell  
VICE PRESIDENT  
AUTHORIZED REPRESENTATIVE



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

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

November 8, 1994

Mr. Rodger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87504

Re: Discharge Plans for One C.D.P. - San Juan County and  
Two Compressor Stations - Rio Arriba County

Dear Mr. Anderson:

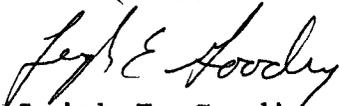
Enclosed please find three copies of the Williams Field Services  
Discharge Plans for the following sites:

1. Navajo C.D.P, San Juan County;
2. Trunk L Compressor Station, Rio Arriba County; and
3. Trunk M Compressor Station, Rio Arriba County.

Williams Field Services' engineering section has not yet received  
the final engineering drawings for these sites. Site plans will be  
forwarded to you as soon as they are finalized. Also enclosed,  
please find three checks for \$50.00 each, payable to the New Mexico  
Water Quality Management Fund, to cover the application fees for  
the above referenced projects.

If you have any questions or require additional information, please  
do not hesitate to contact me at (801) 584-6543. Your assistance  
in processing these discharge plans is appreciated.

Sincerely,



Leigh E. Gooding, P.G.  
Environmental Specialist

Attachments

cc: M. Hall, 2C2

RECEIVED  
NOV 16 1994  
OIL CONSERVATION DIV.  
SANTA FE

RECEIVED  
NOV 15 1994  
OIL CONSERVATION DIV.  
SANTA FE

RECEIVED  
NOV 16 1994  
OIL CONSERVATION DIV.  
SANTA FE

DISCHARGE PLAN

MANZANARES GATHERING SYSTEM  
NAVAJO C.D.P.

Williams Field Services Company

October 1994

1.0 GENERAL INFORMATION

1.1 Legally Responsible Party

Williams Field Services  
P.O. Box 58900, M.S. 2G1  
Salt Lake City, Utah 84158-0900  
(801) 584-6999

Contact Person

Leigh Gooding  
Environmental Specialist  
(801) 584-6543  
Address, Same as Above

1.2 Location of Discharge

The Navajo C.D.P. is located NENW 1/4 of Section 2, Township 30 North, Range 8 West, San Juan County, New Mexico. A vicinity map is attached (Archuleta, New Mexico) as Exhibit 1. The cleared site for this Compressor Station is approximately 4.02 acres. The site boundary survey is provided in Figure 1.

1.3 Type of Natural Gas Operation

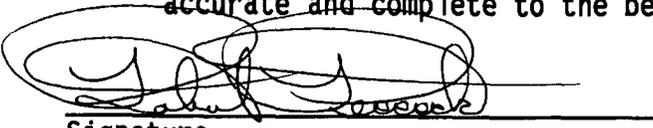
The Navajo C.D.P. will provide metering, compression, and dehydration services to various producers for the gathering of coal seam methane gas (Fruitland Coal Formation) on a contract basis for ultimate delivery through the WFS Milagro Plant (CO<sub>2</sub> removal) near Bloomfield, New Mexico.

Ten (10) 1,055 horse power (site rated), skid mounted, self contained, natural gas fired lean-burn compressor units and three (3) skid-mounted, self-contained glycol dehydrators are currently planned for this site.

This facility is classified as a field compressor station. Consequently there will be no formal office or other support facilities not essential to field compression.

1.4 Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate and complete to the best of my knowledge and belief.

  
\_\_\_\_\_  
Signature

Robert Peacock

October 28, 1994  
Date

Project Manager

## 2.0 GENERAL PROCESSES

### 2.1 Process Fluids

Table 1 lists the sources and planned disposition of liquid waste process and fluids with approximations of the quantity and type. Material Safety Data Sheets for glycol and oil used in the equipment have been previously provided to the OCD by Williams Field Services. For reference, representative samples of washdown wastewater and used motor oil have previously been collected at a typical Williams Field Services C.D.P. and analyzed for the parameters listed below.

<u>Sample</u>	<u>Parameters</u>
Washdown Wastewater	TDS, pH, BETX, As, Ba, Cd, Cr, Pb, Hg, TOX.
Used Motor Oil	As, Cd, Cr, Pb, TOX, Flash Point

Additional Chemicals listed in WQCC 1-101.44 and 3-103 are not expected to be present in any process fluids or in the coal seam gas transported at the Navajo C.D.P.

### 2.2 Spill/Leak Prevention and Housekeeping Procedures

Production Operators, Incorporated (POI) will be contracted to operate and maintain the facility. The facility will be inspected several times per week at a minimum and a POI operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The facility will be remotely monitored for equipment malfunctions. Production Operators must comply with Williams' spill response procedures.

Environmental Protection will be a contractual obligation as follows:

POLLUTION/HAZARDOUS WASTE. POI shall take all necessary precautions to control pollution of any kind resulting from POI's operation of the compression equipment. At POI's sole cost, all hazardous substances, hazardous wastes and oil will be managed to prevent contamination of property and associated surface and groundwater resources.

POI will comply with all applicable spill reporting and recordkeeping requirements of federal, state and local laws and regulations pertaining to hazardous substances, hazardous wastes and oil. POI shall be responsible for all costs related to the cleanup and disposal of contaminated material as well as personal or property damage resulting from such contamination on said property. Hazardous wastes will be properly stored and disposed of in accordance with applicable state and federal laws and regulations.

TABLE 1

Sources and Disposition of  
Process Fluids

<u>Source</u>	<u>Disposition</u>	<u>Quantity</u>	<u>Quality Type</u>	<u>Additives</u>
Compressor Engines	Collected Separately in Tank	125 gal each quarter	Used Motor Oil	None
Glycol Re-generation	Collected Separately in Evaporation Standpipe	15 gpd	Distilled Water	Triethylene Glycol
Gas Inlet Separator	Collected Separately in Blowdown Tank	Variable, available for upsets	High TDS Water	None
Washdown water	Collected Separately in Tank	Intermittent	Rainwater, Tapwater with Traces of Used Motor Oil & TEG	Soap
Lube Oil	Compressor Engines		Motor Oil	None

For overflow containment, tanks on saddle racks are underlain by concrete splash aprons equipped with retainment curbs. Fluids which collect within the curbed area drain through a pipe into a closed containment system. A drip pan will be placed beneath the catwalk adjacent to the oil filter on each compressor unit to contain spillage during maintenance activities.

Spill containment dikes around the bulk storage tanks will contain 1 1/3 volume of the largest vessel. Spill containment is also provided around the tank loading valves. Surface runoff within the site will drain by sheet flow to the east.

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 will be reported to the OCD pursuant to Rule 116 using the OCD form (see Appendix A).

All pressure vessels on site have been tested in accordance with the requirement of the ASME Boiler and Pressure Vessel Code. All interconnecting gas piping on site has been tested in accordance with the requirements of the ASME Code for Pressure Piping, B31.8 Gas Transmission and Distribution Piping Systems.

### 2.3 Disposal of Waste Fluids

The disposition of waste fluids is described in Table 1 of Section 2.1.

Used motor oil is collected in a closed-piping system from each individual unit to a common above-ground collection tank and trucked from the site by an EPA-registered used oil marketer or recycler.

Distilled water vapor which condenses within the steam line of the glycol regeneration process is collected separately in a standpipe adjacent to each dehydrator. The water drains by gravity from the standpipe to a tank within a closed-piping system and is trucked from the site to an NMOCD authorized disposal facility.

Washdown wastewater from engine deck plates is collected in a closed piping system directly to the wastewater storage tank and disposed of at a commercial facility authorized by the NMOCD.

Porta-pottys present at this facility will be serviced under a contract requiring proper sewage disposal in accordance with applicable laws and regulations.

### 3.0 Site Characteristics

#### A. Hydrologic Features

The Navajo C.D.P. is located in the NENW 1/4 of Section 2, Township 30 North, Range 8 West, San Juan County, approximately thirteen miles southwest of Blanco, New Mexico. The graded site elevation is approximately 6,430 feet above sea level. The undeveloped site is covered by sagebrush, crested wheat grass, and native grasses. The site is underlain by quaternary alluvium which has been deposited over the sandstones and shales of the Nacimiento Formation.

The site is located on a mesa 0.57 mile west of Delfito Canyon. A review of the available hydrologic data<sup>1</sup> for this area revealed that the closest documented sources of ground water are four domestic wells. All four wells are located in the NE 1/4 of Section 2, Township 30 North, Range 8 West at an elevation of approximately 6,420 feet. These include domestic wells Cipriano Archuleta (SJ-1095), Cecil Batts (SJ-1097), Harold Johnson (SJ-1024), and Denzel Wiseman (SJ-1558). Reported depth to ground water in the wells ranged from 20 to 115 feet below ground surface. The wells are also the closest documented down-gradient sources of ground water.

Other down-gradient sources of ground water nearby include the alluvial deposits of Simon Canyon, located approximately one mile west of the site. Ground water within these alluvial deposits flows to the south toward the San Juan River, located approximately 1.5 miles from the site at an elevation of approximately 5,700 feet. The ground water in the alluvial deposits is expected to have a total dissolved solids (TDS) concentration of approximately 2,000 mg/l.

#### B. Flood Protection

After final excavation and grading are complete, surface water runoff from the area surrounding the site will be diverted around the site into the natural drainage path.

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<sup>1</sup> Klausning, R.L. and G.E. Welder, "Availability of Hydrologic Data in San Juan County, New Mexico", U.S.G.S. Open-File Report 84-608, 1984.

Lyford, F.P., "Ground Water in the San Juan Basin, New Mexico and Colorado", U.S.G.S. Water-Resource Investigations 79-73, May, 1979.

Stone, W.J., F.P. Lyford, P.F. Frenzel, N.H. Mizel, E.P. Padgett, "Hydrogeology and Water Resources of San Juan Basin, New Mexico", Hydrologic Report 6, New Mexico Bureau of Mines & Mineral Resources, 1983.

**FIGURE 1**  
**SITE BOUNDARY SURVEY**

MANZANARES

GATHERING SYSTEM

NORTHWEST PIPELINE CORPORATION

LINE \_\_\_\_\_ LATERAL 3 GDP SITE NAVAJO CDP

SCALE: 1" = 1000' DWG. NO. \_\_\_\_\_

FROM \_\_\_\_\_

DRAWN BY: R.C.B. DATE 8/11/94

COUNTY SAN JUAN STATE NEW MEXICO

CHECKED BY: P.B. SURVEYED 8/4/94

SECTION 2 TOWNSHIP 30-N RANGE 8-W

APPROVED: \_\_\_\_\_ W.O. NO. \_\_\_\_\_

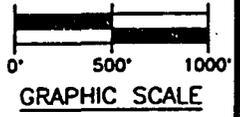
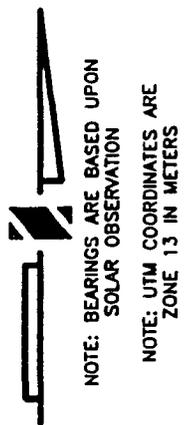
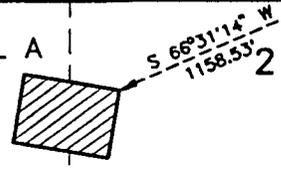
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34 | 35 | 35 | 36

T31N  
T30N

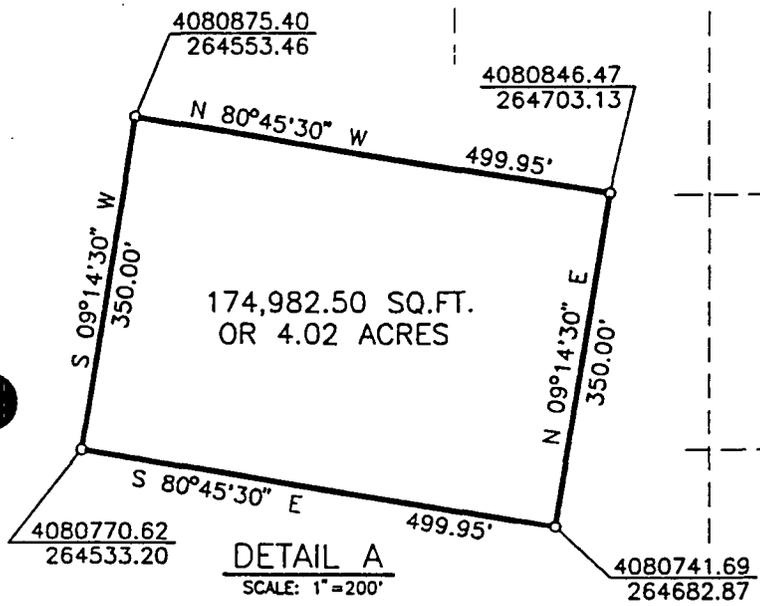
FND. BRASS CAP  
1953 B.L.M.

3 | 2 | SEE DETAIL A | 2 | 1



LEGEND

- SET 1/2" REBAR W/ CAP LS #6707
- FND. AS NOTED



CERTIFICATE OF SURVEYOR

I HEREBY CERTIFY THAT THIS PLAT IS A TRUE REPRESENTATION OF A SURVEY MADE BY ME OR UNDER MY DIRECT SUPERVISION, AND THE SAME IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

*Harvey D. Peterson*  
 HARVEY D. PETERSON  
 NEW MEXICO L.S. # 6707  
 SURVEYOR

DESIGN FACTOR
DESIGN PRESSURE
TEST PRESSURE

MAOP	SUBDMISION	MINIMUM: OWNER	ACTUAL:				MAXIMUM:	
			LEASE	FEET	MILES	ACRES	RODS	
	N /2, NE /4					4.02		

Rev.	
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**APPENDIX A**  
**SPILL CONTROL PROCEDURES**

# OPERATIONS

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
Effective Date 10-10-93	Issue No. 1	Page No. 1 of 6

Subject of Title  
**DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of**

**A. PURPOSE AND SCOPE**

- A.1 To establish the policy and procedure for preventing, controlling, and reporting of spills or discharges of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
- A.2 This document pertains to Company personnel and Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

**B. CONTENTS**

**C. POLICY**

- C.1 General
- C.2 Bulk Storage Tanks
- C.3 Facility Drainage
- C.4 Transfer Operations, Pumping, and In-Plant/Station Process
- C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack

**D. PROCEDURE**

- D.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of a Hazardous or Toxic Substance
- D.2 Submitting Written Notification of a Discharge or Spill

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

**C. POLICY**

**C.1 GENERAL**

- C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.
- C.1.2 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
  - a. Section 101 (N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
  - b. Section 307(a) and Section 311 (b)(2)(A) of the Clean Water Act
  - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
  - d. Section 112 of the Clean Air Act
  - e. Section 7 of the Toxic Substance Control Act

Supersedes Policy and Procedure 12.10.020 dated July 7, 1989.

Approved (Page 1 Only) <i>[Signature]</i>	Approved (Page 1 Only) <i>[Signature]</i> 6/18/93	Approved (Page 1 Only) <i>[Signature]</i> B. C. England
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FORM 1711 (1/92)

# OPERATIONS

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
Effective Date 6-16-93	Issue No. 1	Page No. 2 of 6

Subject of Title

DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

- C.1.3 The term hazardous substance does not include petroleum, including crude oil or any fraction thereof, which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.4 Oil, for the purpose of this document, means oil of any kind or in any form, including but not limited to petroleum, fuel oil, Y grade, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) are not considered to be oil.
- C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the required federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
- a. Non-Transportation Related Facilities
    - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
    - (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
  - b. Transportation Related Facilities
    - (1) All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.
- C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all hazardous substance storage vessels at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.
- C.1.8 The facility supervisor is responsible for spill prevention. His/her duties include, but are not limited to, the following:
- a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
  - b. Conduct briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
  - c. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.
- C.1.9 Each individual facility is checked by the supervisor or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.

# OPERATIONS

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
Effective Date 10-16-93	Issue No. 1	Page No. 3 of 6

Subject of Title

DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

- b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
- c. A annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.

C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at annual scheduled intervals for accumulation of liquid hydrocarbons or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

## C.2 BULK STORAGE TANKS

C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the material stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.

C.2.2 The facility supervisor should evaluate level monitoring requirements to prevent tank overflow.

C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.

C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

## C.3 FACILITY DRAINAGE

C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from dike areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.

C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.

C.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.

C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:

- a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation, or displacement by foreign materials.
- b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.

# OPERATIONS

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
Effective Date 10-11-93	Issue No. 1	Page No. 4 of 6

Subject of Title

DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

- c. Any dike three feet or higher should have a minimum cross section of two feet at the top.

C.3.5 Other means of containment or spill control include, but are not limited to:

- a. Berms or retaining walls;
- b. Curbing;
- c. Culverting, gutters, or other drainage systems;
- d. Weirs, booms, or other barriers;
- e. Spill diversion ponds or retention ponds;
- f. Sorbent materials

C.4 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT/STATION PROCESS

C.4.1 Aboveground valves and pipelines should be examined annually by operating personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks, and metal surfaces.

C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

C.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.

C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.

C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets which may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

NOTE: LPG loading facilities and remote field loading of condensate are exempt from the C.5 requirements of this document.

D. PROCEDURE

D.1 IDENTIFYING, CONTAINING AND INITIAL REPORTING OF A DISCHARGE OR SPILL OF OIL OR HAZARDOUS SUBSTANCE

Any Employee

D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity initiates immediate containment procedures and notifies facility supervisor.

NOTE: Refer to Attachment A for containment procedures.

Facility Supervisor

D.1.2 Contacts Gas Control and responsible Director immediately by telephone and provides the following information:

- a. Name of company facility and/or location of facility and nature of discharge or spill
- b. Description and quantity of emission or substance discharged
- c. Name, title, and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
- d. Action taken or being taken to mitigate and correct discharge or spill
- e. Water bodies or streams involved
- f. Time and duration of discharge or spill
- g. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)

# OPERATIONS

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

### Gas Control Personnel

D.1.3 Advises Environmental Services departments immediately by telephone concerning the incident including any incidents reported by persons not employed with the Company.

**NOTE:** If Gas Control is contacted by a person not employed with the Company, the necessary information is obtained as indicated in D.1.2 and the Supervisor and Environmental Services are immediately contacted to begin containment and clean-up of the discharge or spill.

D.1.4 If Environmental Services cannot be contacted, notifies Director over Environmental Services.

### Facility Supervisor

D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director informed.

D.1.6 If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).

D.1.7 Advises Environmental Services by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

### Environmental Services

D.1.8 Contacts Legal Department (and Right-of-Way Department, if appropriate) and assesses reporting requirements to state and federal agencies. (See Emergency Operating Procedure Manuals).

D.1.9 Makes appropriate contacts with U.S. Coast Guard and state agencies when necessary.

D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

## D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

### Facility Supervisor

D.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:

- a. Time and date of discharge or spill
- b. Facility name and location
- c. Type of material spilled
- d. Quantity of material spilled
- e. Area affected
- f. Cause of spill
- g. Special circumstances
- h. Corrective measures taken
- i. Description of repairs made
- j. Preventative measures taken to prevent recurrence.

D.2.2 Forwards the completed report to Environmental Services and a copy to Legal Department. Retains a copy for future reference.

**NOTE:** Environmental Services, in coordination with the Legal Department, submits written reports to government agencies.

# OPERATIONS

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
Effective Date 10-14-93	Issue No. 1	Page No. 6 of 6

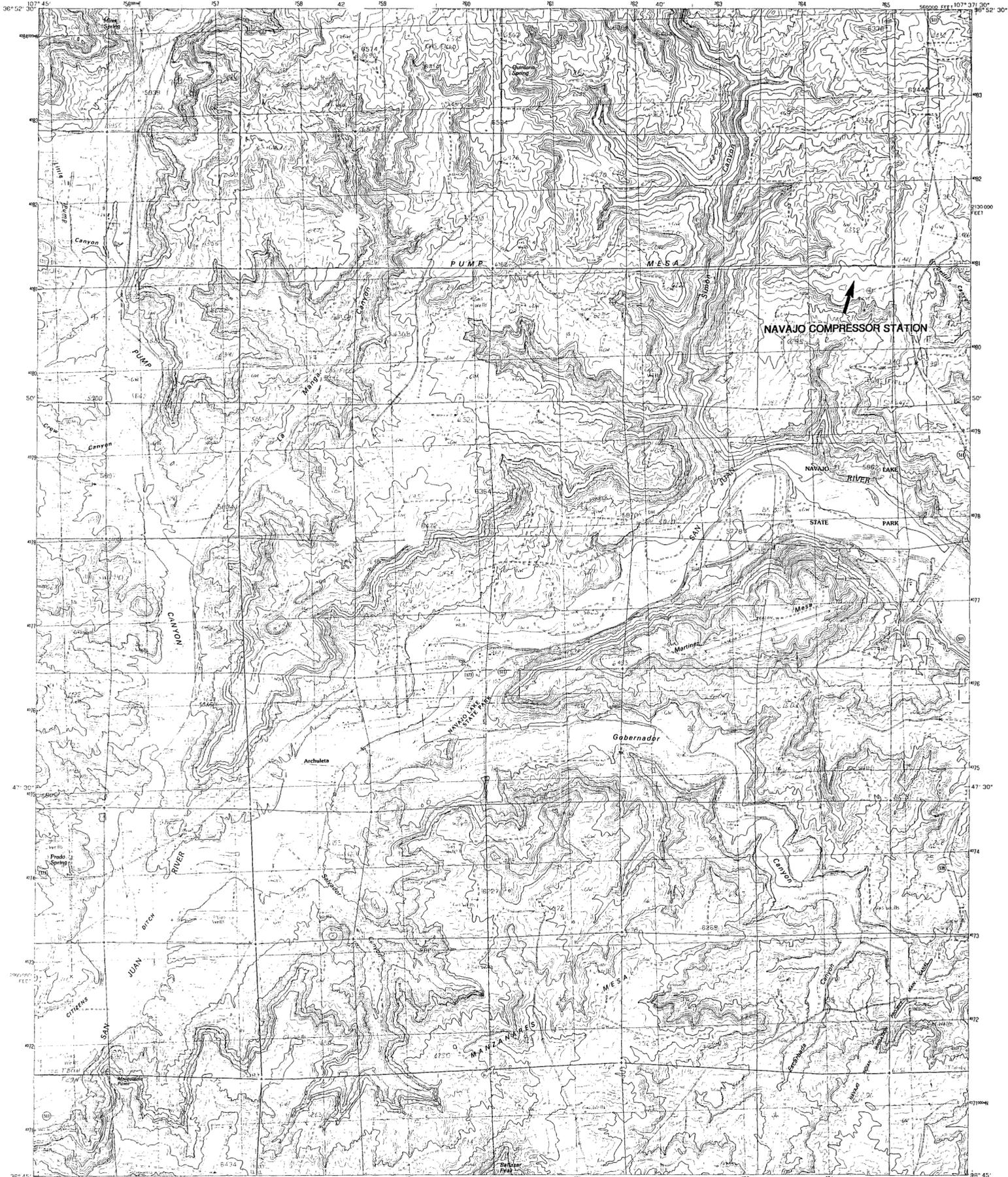
Subject of Title

DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

## ATTACHMENT A

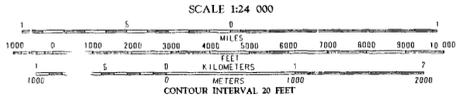
### Discharge or Spill Containment Procedures and Materials

Type of Facility where the Discharge or Spill occurs	Containment Procedures	Material Used for Containment
A. Oil Pipeline (as defined in C.1.4)	<ol style="list-style-type: none"> <li>1. Closes appropriate block valves.</li> <li>2. Contains discharge or spill by: ditching covering, applying sorbents, constructing an earthen dam, or burning.</li> <li>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</li> </ol>	<ol style="list-style-type: none"> <li>1. Straw</li> <li>2. Loose Earth</li> <li>3. Oil Sorbent - 3M Brand</li> <li>4. Plain Wood Chips</li> <li>5. Sorb - Oil Chips Banta Co.</li> <li>6. Sorb - Oil Swabs - Banta Co.</li> <li>7. Sorb - Oil Mats - Banta Co.</li> <li>8. Or Equivalent Materials.</li> </ol>
B. Vehicle	<ol style="list-style-type: none"> <li>1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, applying sorbents, or burning.</li> <li>2. Notifies immediately the Compliance and Safety Department and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials.</li> <li>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</li> </ol> <p>NOTE: Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.</p>	
C. Bulk Storage Tanks or any other Facilities	<ol style="list-style-type: none"> <li>1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning.</li> <li>2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</li> </ol>	



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CONTROL POINTS ..... GROUND POINTS  
CONTROLS FROM AERIAL PHOTOGRAPHY TAKEN ..... 1960  
FIELD CHECKED ..... 1961  
PROJECTED ..... TRANSVERSE MERCATOR  
GRID ..... UNIVERSAL TRANSVERSE MERCATOR ..... ZONE 13  
HORIZONTAL DATUM ..... NORTH AMERICAN DATUM OF 1983  
UTM GRID DECLINATION ..... 13° WEST  
MAGNETIC NORTH DECLINATION ..... 12° EAST  
VERTICAL DATUM ..... NATIONAL GEODESIC VERTICAL DATUM OF 1985  
HORIZONTAL DATUM ..... 1927 NORTH AMERICAN DATUM  
To place on the predicted North American Datum of 1983,  
move the projection lines as shown by dashed corner ticks  
(2 meters north and 55 meters east).  
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Federal and State Reservations shown on this map.  
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Produced from original  
manuscript drawings. Informa-  
tion shown as of date of  
field check.



QUADRANGLE LOCATION

1	2	3
4	5	6
7	8	

ADJOINING 7.5' QUADRANGLE NAMES

**ROAD LEGEND**

Improved Road .....  
Unimproved Road .....  
Trail .....  
Interstate Route U.S. Route State Route

ARCHULETA, NEW MEXICO  
PROVISIONAL EDITION 1985

36107-G6-TF-024

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