

**GW - 198**

**PERMITS,  
RENEWALS,  
& MODS  
Application**

GW-198

RECEIVED

*Cirrus Consulting, LLC*

2010 MAR 25 PM 1 23

March 23, 2010

Mr. Glen von Gonten  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Subject: Discharge Plan Renewal Application  
Williams Four Corners, LLC 29-6#3 Compressor Station (GW-198)

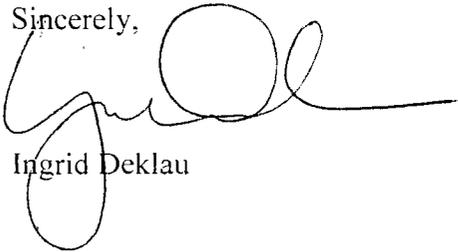
Dear Mr. von Gonten:

On behalf of Williams Four Corners, LLC, Cirrus Consulting, LLC submitted the Discharge Plan renewal application for the 29-6#3 Compressor Station (GW-198) to you via email on March 22, 2010. A copy of the email was also forwarded to Brandon Powell, OCD District 3.

Enclosed please find a check for \$100 to cover the filing fee for the application.

If any additional information is needed, please contact me at the number below or Monica Sandoval of Williams Four Corners, LLC at (505) 632-4625.

Sincerely,



Ingrid Deklau

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. \_\_\_\_\_ dated 3/23/10

or cash received on \_\_\_\_\_ in the amount of \$ 100<sup>00</sup>

from WILLIAMS FOUR CORNERS LLC

for GW-198

Submitted by: Lawrence Roxero Date: 3/26/10

Submitted to ASD by: Lawrence Roxero Date: 3/26/10

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

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

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

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

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

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

State of New Mexico  
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES,  
COMPRESSOR, GEOTHERMAL FACILITIES  
AND CRUDE OIL PUMP STATIONS**

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

New     Renewal     Modification

1. Type: Compressor Station (29-6#3 Central Delivery Point, GW-198)

2. Operator: Williams Four Corners, LLC

Address: 188 CR 4900, Bloomfield, NM 87413

Contact Person: Monica Sandoval

Phone: 505-632-4625

3. Location: NE/4 NW/4 Section 14    Township 29 North    Range 6 West  
Submit large scale topographic map showing exact location.

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

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

6. Attach a description of all materials stored or used at the facility.

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

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

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

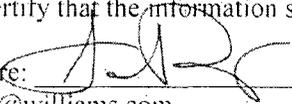
10. Attach a routine inspection and maintenance plan to ensure permit compliance.

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

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

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

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

Name: Monica Sandoval; Signature: 

E-mail Address: monica.sandoval@williams.com

Title: Environmental Specialist

Date: 3/22/2010



## **29-6#3 Central Delivery Point**

NMOCD Discharge Plan  
GW-198 Renewal

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

March 2010

**Item 1**

*Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant (CO<sub>2</sub> removal) and compressor station include the total combined site rated horsepower.*

The 29-6#3 Central Delivery Point is owned and operated by Williams Four Corners, LLC (Williams). It is located about 30 miles east of Bloomfield, New Mexico. The station was constructed in 1995 to provide various producers natural gas gathering, compression, treatment and delivery services through the Williams system. The site is permitted for two reciprocating compressor engines (site-rated at 1355 horsepower each) and two dehydrators. Compressors may be installed or removed to meet demand. In addition, there are various storage tanks, support structures and ancillary equipment.

**Item 2**

*Name of operator or legally responsible party and local representative.*

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

**Local Representative** Monica Sandoval  
Williams Four Corners, LLC  
188 County Road 4900  
Bloomfield, NM 87413  
(505) 642-4625

**Item 3**

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

Rio Arriba County, New Mexico  
Township 29 North, Range 6 West, NE/4 NW/4 Section 14  
The topographic map is attached as Figure 1.

**Item 4**

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

Williams Four Corners, LLC is leasing the subject property from:

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

**Item 5**

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

An updated facility plot plan is included with this document as Figure 2. There have been no other modifications to this section. See information on-file at OCD.

**Item 6**

*Attach a description of all materials stored or used at the facility.*

Table 1 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

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

**Item 7**

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

The source, quantity, and quality of effluent and waste solids expected to be generated at the compressor station are summarized in Table 2.

**Item 8**

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

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

**Item 9**

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

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

**Item 10**

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

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

**Item 11**

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

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

**Item 12**

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

A current well search was performed using the New Mexico Office of the State Engineer's WATERS Database(1) for this renewal application. There is no new information to report for this item. Information on the two documented water wells in the vicinity of the facility is presented in the table below. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 200-2,000 mg/l. Depth to groundwater is expected to exceed 100 feet. See additional information on-file at OCD.

Township; Range; Section	Quarter <sup>a</sup>	Apx. Distance from Site (mi)	Well #	Use <sup>b</sup>	Well Depth (ft)	Water Bearing Stratifications (ft)	Description	Depth to Water (ft)
29N; 6W; 13	143	0.75 - 1	SJ 03364	Stk	900	0-900	Other/Unknown	620
29N; 6W; 12	222	1.25-1.5	SJ 02794	Dom	280	145-200	Sandstone	140

Note a: 1=NW/4; 2=NE/4; 3=SW/4; 4=SE/4; from smallest to largest (eg. Q/64; Q/16; Q4)

Note b: DOM = domestic; POL = pollution control well; Stk = stock

**References**

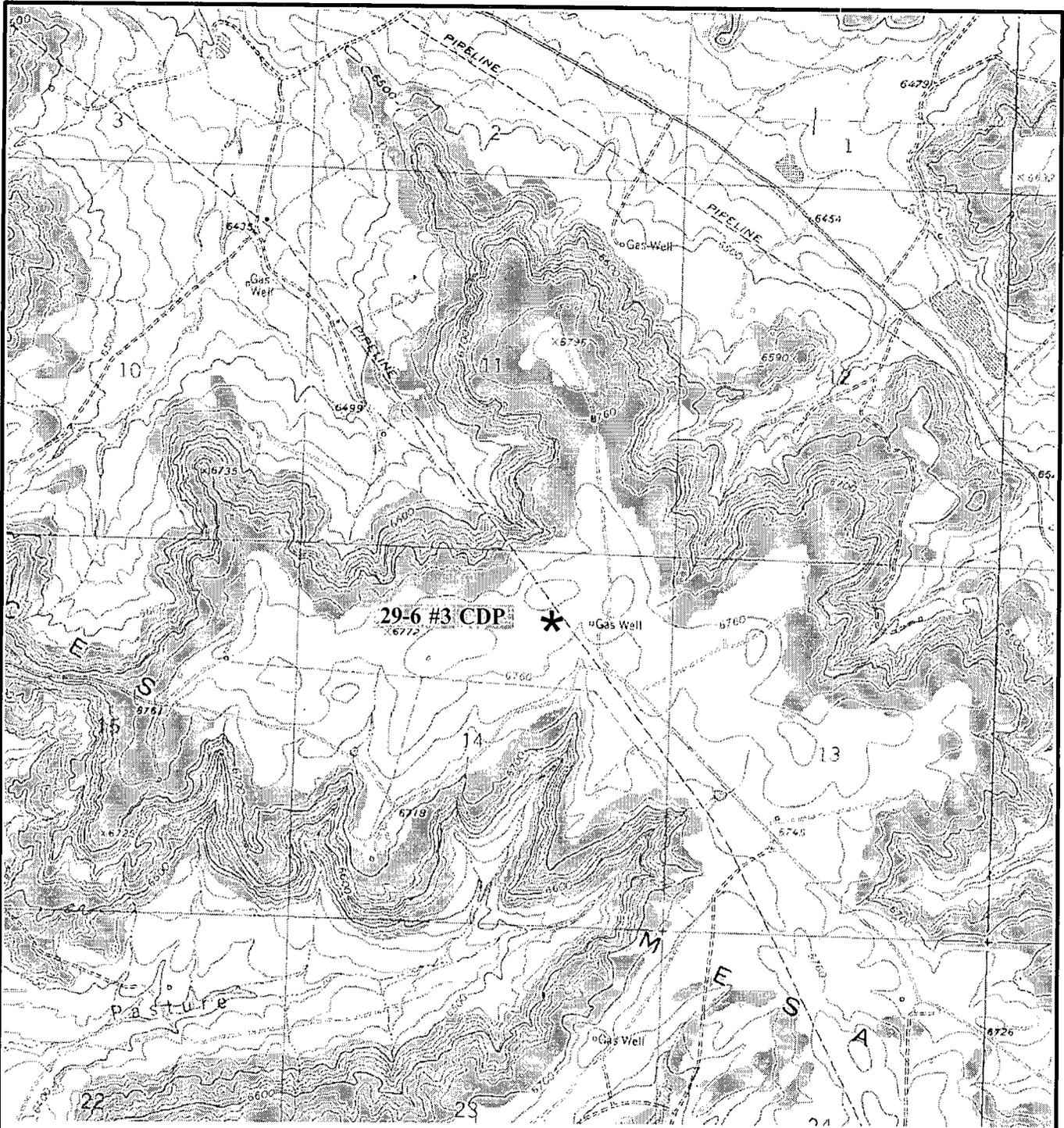
<sup>1</sup>Online Well Reports and Downloads, New Mexico Office of the State Engineer, search performed 2/7/2010.

<sup>2</sup>Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

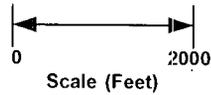
**Item 13**

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

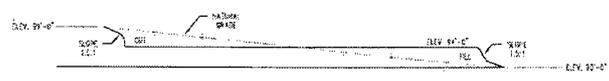
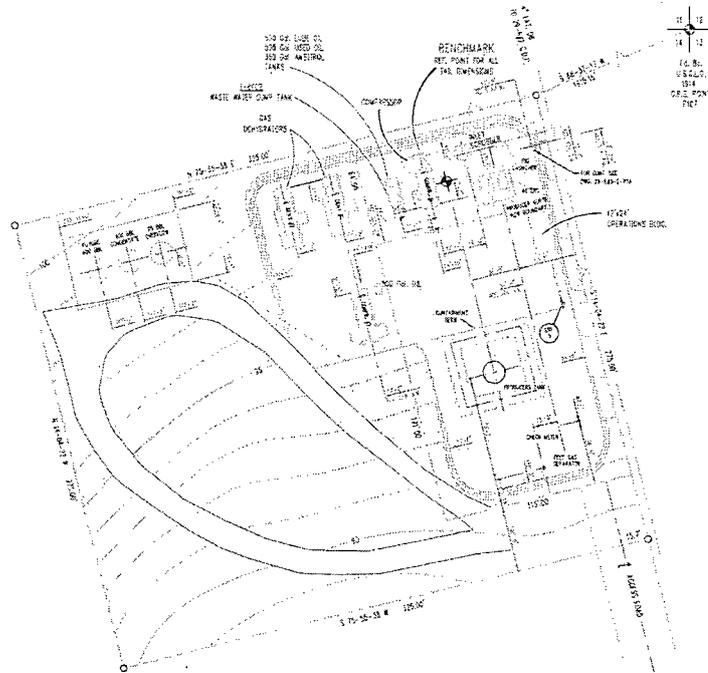
There have been no modifications to this section. See information on-file at OCD.



Source: USGS Four Mile Canyon and Gomez Ranch,  
 NM Quadrangles

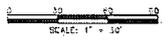


**Figure 1 Site Vicinity / Topographic Map**  
**29-6 #3 CDP Compressor Station**  
 Section 14, Township 29N Range 6W  
 Rio Arriba County, New Mexico



AREA = 89,379 Sq.Ft.  
OR 2.05 ACRES

- NOTES**
1. ELEVATION AREA SHOWN IS AN APPROXIMATE AREA REQUIRED, AND MAY BE ADJUSTED AS REQUIRED BY AERIAL FIELD CONDITIONS.
  2. DIMENSIONS AND OPERATIONS DRAWINGS TO BE CONSIDERED AS REQUIRED AFTER FINAL SURVEY AND DIMENSIONS COMPLETE.



RECORDED  
SERIALIZED  
INDEXED  
MAY 19 1954

NOTES:

<p>REVISIONS</p> <p>NO. DATE BY</p> <p>7 NOV 1954 FOR FIELD WORKS</p> <p>6 MAY 1954 FOR FIELD WORKS</p> <p>5 MAY 1954 FOR FIELD WORKS</p> <p>4 MAY 1954 FOR FIELD WORKS</p> <p>3 MAY 1954 FOR FIELD WORKS</p> <p>2 MAY 1954 FOR FIELD WORKS</p> <p>1 MAY 1954 FOR FIELD WORKS</p>		<p>WILLIAMS MIDSTREAM GAS &amp; LIQUIDS</p> <p>SAN JUAN FIELD, N.M.</p> <p>REGISTRATION &amp; SITE LAYOUT</p> <p>PROJECT NO. 29-6#3-1-M1</p> <p>DATE 6/11/54</p>	
<p>REFERENCE DRAWINGS</p>		<p>APPROVED BY: [Signature]</p> <p>DATE: 6/11/54</p>	

**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*	Metal tank	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Waste Water	Below ground storage tank	740 gal	Dual-walled, steel	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to any facility permitted by any state, federal, or tribal agency to receive industrial solid waste; or evaporation at Williams' facility may be considered. Any waste determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste.
Natural Gas Condensate	Above ground storage tank	400 bbl 400 bbl	Lined berm Lined berm-to be installed in future	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Natural Gas Condensate/Produced Water	Below ground storage tank	2940 gal	Dual-walled, steel	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Used Oil Filters, Oil Soaked Pads & Socks	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Used oil filters and oil soaked pads and socks will be recycled as required by OCD regulations.
Used Process Filters	Drum or other container	Varies	Transported in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Spill Residue (e.g., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm or transported to Williams' or contractor facility	Non-exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Triethylene Glycol	Above ground storage tank	50 gal overflow*; 100 gal day tank*	Dehy skid	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Antifreeze (Ambitol)	Above ground storage tank	300 gal	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above ground storage tank	500 gal*	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Natural Gas Condensate/ Produced Water	Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank	600-8000 bbl/year	May contain trace lube oil and/or glycol
Natural Gas Condensate	Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank	500-8000 bbl/year	No Additives
Waste Water/ Wash Down Water	Compressor and Dehy Skids; Process Areas; Condensate Tank	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil and/or glycol
Used Glycol/Antifreeze/ Methanol	Site and Field Dehydration/ Coolant	0-4000 bbl/yr	No additives
Used Solvent	Parts Cleaner; Pipeline Additive	0-500 gal/year	No additives
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	50-500/year/engine	No Additives
Used Process Filters	Charcoal, Activated Carbon, Molecular Sieve	50-500 cubic yd/yr	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Amibitol	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
Used/off-spec materials (eg. glycol, antifreeze, corrosion inhibitor)	Dehydration and compression	0-200 gal/yr/material	No Additives

See attached DRAFT Public Notice, to include the following:

- Newspaper notice published in Farmington Daily Times in English and Spanish
- Landowner notice – N/A – applicant is the landowner



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

October 1, 2009

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

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

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC submitted a Discharge Plan Renewal application to the Oil Conservation Division for the permitted 29-6#3 Central Delivery Point (GW-198) in March 2010. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations.

The facility, located in the NE/4, NW/4 of Section 14 Township 29 North, Range 6 West in Rio Arriba County, New Mexico (BLM Grant NM101002), approximately 30 miles east of Bloomfield, provides natural gas compression and conditioning services.

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

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

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

Respectfully submitted,

Monica Sandoval  
Environmental Specialist

## PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in March 2010 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-198 for their 29-6#3 Central Delivery Point located in the NE/4, NW/4 of Section 14 Township 29 North, Range 6 West in Rio Arriba County, New Mexico. The facility, located approximately 30 miles east of Bloomfield, provides natural gas compression and conditioning services.

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

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

## ATENCIÓN PÚBLICA

Williams Four Corners, LLC, County Road 4900, Bloomfield, NM 87413, han presentado una aplicación de renovación en marzo de 2010 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para el plan de gestión aprobado previamente GW-198 para su 29-6#3 Central Delivery Point localizada en el NE/4, NW/4 de la Sección 14, Municipio 29 Norte, Recorren 6 Oeste en Rio Arriba County, New Mexico. La instalación, de aproximadamente 30 millas al este de Bloomfield, proporciona servicios de acondicionamiento y compresión de gas naturales.

El plan de alta se ocupa de cómo los derrames, fugas, y vertidos accidentales será administrado. Los materiales típicos generados o utilizados en la instalación incluyen condensados de gas natural o producido de agua, de aceite lubricante nuevos y usados, las aguas residuales de hidrocarburos de lavar el equipo hacia abajo, y glicol. La cantidad de aguas residuales generadas es 100 - 5000 galones por año por cada motor. La instalación no se descarga a aguas superficiales o subterráneas. Todos los residuos generados se almacenan temporalmente en cisternas o contenedores equipados con contención secundaria. Residuos serán eliminados o reciclados en una instalación autorizada por el estado, federal o tribal del organismo para recibir este tipo de residuos. La estimación de la profundidad del agua subterránea en el sitio se espera que sea mayor de 100 pies. La concentración de sólidos disueltos totales de agua subterránea se espera que esté en el rango de 200-2,000 partes por millón.

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

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-198  
WILLIAMS FIELD SERVICES  
29-6 #3 CDP COMPRESSOR STATION  
DISCHARGE PERMIT APPROVAL CONDITIONS  
(August 29, 2005)

1. Payment of Discharge Permit Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, 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 permit renewal application dated June 30, 2005 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 a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. 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 permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, 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 Permit: Williams Field Services shall maintain storm water runoff controls. As a result of Williams Field Services' 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 shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the 29-6 #3 CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the 29-6 #3 CDP Compressor Station a closure permit 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, 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 David Bay

SR. ENV. SPECIALIST  
Title



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

**Mr. David Bays**

Williams Field Services

188 CR 4900

Bloomfield, New Mexico 87413

August 29, 2005

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

Director

Oil Conservation Division

**RE: Discharge Permit Renewal GW-198  
Williams Field Services  
29-6 #3 CDP Compressor Station  
Rio Arriba County, New Mexico**

Dear Mr. Bays:

The ground water discharge permit renewal application GW-198 for the Williams Field Services 29-6 #3 CDP Compressor Station located in the NW/4 NE/4 of Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. 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 original discharge permit application was submitted on May 9, 1995 and approved July 31, 1995.

The discharge permit renewal application letter, dated June 30, 2005, submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge permit is renewed pursuant to 20 NMAC 3106.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provides for possible future amendment or modifications of the permit. Please be advised that approval of this permit 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.

Please note that 20 NMAC 3104 of the regulations provides: "When a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to 20 NMAC 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.

Mr. David Bays  
GW-198 29-6 #3 CDP Compressor Station  
August 29, 2005  
Page 2

Pursuant to 20 NMAC 3109.G.4., this renewal permit is for a period of five years. This renewal will expire on **July 31, 2010**, 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 permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. 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 renewal application for the Williams Field Services 29-6 #3 CDP Compressor Station 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 \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 1001 horsepower equal to \$1,700.00. 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 permit review.

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf  
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-198  
WILLIAMS FIELD SERVICES  
29-6 #3 CDP COMPRESSOR STATION  
DISCHARGE PERMIT APPROVAL CONDITIONS  
(August 29, 2005)

1. Payment of Discharge Permit Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, 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 permit renewal application dated June 30, 2005 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 a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. 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 permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, 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 Permit: Williams Field Services shall maintain storm water runoff controls. As a result of Williams Field Services' 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 shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the 29-6 #3 CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the 29-6 #3 CDP Compressor Station a closure permit 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, 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

ATTACHMENT TO THE DISCHARGE PLAN GW-198  
WILLIAMS FIELD SERVICES  
29-6 #3 CDP COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(June 22, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated April 4, 2001 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 determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
4. 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 every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. 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. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the 29-6 #3 CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the 29-6 #3 CDP Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. 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: *July 16, 2001*

WILLIAMS FIELD SERVICES

by *Clara M. Jones*  
Title  
*Env. Compliance Admin.*



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
**Oil Conservation Division**

June 22, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 0524**

Ms. Clara L Garcia  
Williams Field Services  
188 CR 4900  
Bloomfield, New Mexico 87413

**RE: Discharge Plan Renewal Approval GW-198**  
**Williams Field Services**  
**29-6 #3 CDP Compressor Station**  
**Rio Arriba County, New Mexico**

Dear Ms. Garcia:

The ground water discharge plan renewal GW-198 for the Williams Field Services 29-6 #3 CDP Compressor Station located in the NW/4 NE/4 of Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, is **hereby approved** under the conditions contained in the enclosed attachment. 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 original discharge plan application was submitted on May 9, 1995 pursuant to Section 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan renewal application was submitted April 4, 2001 pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Section 3109.G., which provides for possible future amendment 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.

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.H.4., this discharge plan is for a period of five years. This plan will expire on **July 31, 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 .

Williams Field Services will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the 29-6 #3 CDP Compressor Station.

Ms. Clara L. Garcia  
GW-198 29-6 #3 CDP Compressor Station  
June 22, 2001  
Page 2

The discharge plan application for the Williams Field Services 29-6 #3 CDP Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1700.00. 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 plan review.

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf  
Attachment

xc: OCD Aztec Office

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To:	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Name (Please Print Clearly) (To be completed by mailer)	
C. Garcia	
Street, Apt. No.; or PO Box No.	
WFS	
City, State, ZIP+ 4	
910-198	
PS Form 3800, July 1999	
See Reverse for Instructions	

4250 1505 0000 0220 3220 6607 7099

ATTACHMENT TO THE DISCHARGE PLAN GW-198  
WILLIAMS FIELD SERVICES  
29-6 #3 CDP COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(June 22, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated April 4, 2001 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 determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
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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. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the 29-6 #3 CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the 29-6 #3 CDP Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. 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

OIL CONSERVATION DIV.  
01 JUL 23 PM 1:21



Environmental Affairs  
188 CR 4900  
Bloomfield, NM 87413  
505/634-4956  
505/632-4781 Fax

July 16, 2001

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

**Re: Discharge Plan Application Fee**

Dear Mr. Ford:

Enclosed please find check number 1000319478 is \$2,100.00 to cover the flat fee for discharge plans on the following sites:

- 5-Points Compressor Station (GW-078)
- 29-6#3 CDP Compressor Station (GW-198)

Williams Field Services appreciates your assistance in handling these applications and fees. If you have any questions or require additional information, please contact me at 505/634/4956.

Thank you,

A handwritten signature in black ink that reads "Clara M Garcia".

Clara M Garcia  
Environmental Compliance

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/12/01  
or cash received on \_\_\_\_\_ in the amount of \$ 2,100.00  
from Williams Field Services  
for 5-Points CS GW-078  
29-6#3 DP CS GW-198  
(Facility Name)  
Submitted by: [Signature] Date: 7/23/01 (CP No.)  
Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_  
Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_  
Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal   
Modification \_\_\_\_\_ Other \_\_\_\_\_  
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  
1800 South Baltimore Avenue \* P.O. Box 645 \* Tulsa, OK 74101-0645  
A/C 4401976

PAY TO THE ORDER OF: \_\_\_\_\_ DATE: 07/12/2001

PAY → \*\*\*\*\*\$2,100.00

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

SANTA FE NM 87504  
United States  
Bank One, NA  
Illinois

[Signature]  
Authorized Signer



ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 4/5/01  
or cash received on \_\_\_\_\_ in the amount of \$ 500.00  
from Williams Field Services  
for Manzanares C.S. - 9W-062 Milagro G.P. 6W-060 5-Point C.S. - 9W-078  
Cedar Hills GS - 6W-087 29-6#3 CS - 6W-198

Submitted by: [Signature] Date: 5/1/01  
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  
1800 South Baltimore Avenue \* P.O. Box 645 \* Tulsa, OK 74101-0645  
70-2323.719  
A/C 9401076  
DATE: 04/05/2001

PAY TO THE ORDER OF:

PAY → \*\*\*\*\*\$500.00

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

SANTA FE United States NM 87504  
Bank One, NA Illinois

[Signature]  
Authorized Signer

MA1353 (10/99)  
COPYRIGHT © 1999 BY BANK ONE, N.A. ALL RIGHTS RESERVED.



Environmental Affairs  
188 CR 4900  
Bloomfield, NM 87413  
505/634-4956  
505/632-4781 Fax

April 26, 2001

APR 30 2001

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

**Re: Discharge Plan Application and Filing Fee for WFS Compressor Stations**

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application and check number 1000267866 for \$500.00 to cover the filing fee for the following Williams Field Services (WFS) Compressor Stations:

- Manzanares CDP Compressor Station - GW-062
- Milagro Plant - GW-060
- 5-Points Compressor Station - GW-078
- Cedar Hill CDP - GW-087
- 29-6#3 CDP Compressor Station - GW-198

Also, we would like this to serve as a notice that the compression, dehydration and storage tanks at the Hart Mountain and Trunk G sites have been removed. Therefore, GW208 and GW229, respectively, will not need to be renewed. Although equipment has been removed from service, the site is part of the pipeline right-of-way and is still in use. Upon site closure, the closure plan will be implemented.

Williams Field Services appreciates your assistance in handling this application. If you have any questions or require additional information, please contact me at 505/634/4956.

Thank you,

Clara M Garcia  
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
03-APR-01	20010405	0013671-FCA040107010	DISCHARGE PLAN APPLICATION AND FILING FEE	500.00
CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
	04/05/2001	40665	NEW MEXICO OIL CONSERVATION DI	\$500.00

OIL CONSERVATION DIVISION

July 31, 1995

CERTIFIED MAIL

RETURN RECEIPT NO.P-176-012-165

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

**RE: Discharge Plan GW-198  
29-6 #3 C.D.P. Compressor Station  
San Juan County, New Mexico**

Dear Ms. Gooding:

The discharge plan GW-198 for Williams Field Services, Inc. (WFS) 29-6 #3 C.D.P. Compressor Station located in the NW/4 NE/4 of Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated October May, 1995 and supplemental information dated June 12, 1995 and July 17, 1995.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F. which provide for possible future amendments or modifications of the plan. Please be advised the approval of this plan does not relieve WFS of liability should WFS's operation result in actual pollution of surface water, ground water, or the environment which may be actionable under other laws and/or regulations.

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

Please note that Section 3-104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C. WFS 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 3-109.G.4., this plan is for a period of five (5) years. This approval will expire on July 31, 2000, and WFS should submit an application in ample time before this date.

Ms. Leigh Gooding  
July 31, 1995  
Page 2

The discharge plan application for the WFS's 29-6 #3 C.D.P. Compressor Station is subject to WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat fee. The flat fee for compressor stations site rated with more than 1000 horsepower and less than 3000 horsepower is six hundred ninety dollars (\$690.00).

The \$50.00 filing fee has been received by the OCD. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan with the first payment being due upon receipt of this letter.

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

On behalf of the staff of the Oil Conservation Division, I wish to thank WFS and their staff for cooperating during this discharge plan review.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay" followed by a flourish and the initials "W.J.L." in a smaller script.

William J. LeMay  
Director

WJL/cee  
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-198 APPROVAL  
WILLIAMS FIELD SERVICES, INC.  
29-6 #3 C.D.P. COMPRESSOR STATION  
DISCHARGE PLAN REQUIREMENTS  
(July 31, 1995)

1. Drum Storage: All drums will be stored on pad and curb type containment.
2. Sump Inspection: All pre-existing sumps will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.
3. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
4. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
5. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and appropriate district office pursuant to WQCC Rule 1-203 and OCD Rule 116.
6. Payment of Discharge Plan Fees: The six hundred ninety dollar (\$690.00) flat fee shall be submitted by August 30, 1995. The flat fee may be paid in full or in equal installments over the five year duration of the plan, with the first payment due no later than August 30, 1995.

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 5/15/95  
or cash received on 5/19/95 in the amount of \$ 50.00

from WILLIAMS FIELD SERVICES  
for 29-6 #3 CDP GW 198

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

Submitted to ASD by: Roger Chubb Date: 5/19/95

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

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

Organization Code 521.07 Applicable FY 95

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
05/15/95	[redacted]	50.00

PAY  
FIFTY AND 00/100-----

TO THE ORDER OF  
NEW MEXICO OIL CONSERVATION DI  
NM WATER QUALITY MGMT FUND  
2040 SOUTH PACHECO  
SANTE FE NM 87504

Williams Field Services Company  
*James Phillip*  
VICE PRESIDENT  
AUTHORIZED REPRESENTATIVE



ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8/4/95  
or cash received on 8/8/95 in the amount of \$ 690.00  
from Williams Field Service  
for 29-6 #3 CDP GW-198

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

Submitted to ASD by: [Signature] Date: 8/8/95

Received in ASD by: [Signature] Date: 8/9/95

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
08/04/95	[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  
[Signature]  
VICE PRESIDENT  
AUTHORIZED REPRESENTATIVE



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

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

Revised June 10, 2003

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

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS,  
REFINERIES, COMPRESSOR, GEOTHERMAL FACILITIES  
AND CRUDE OIL PUMP STATIONS**

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

New       Renewal       Modification

1. Type: Compressor Station (29-6#3 Central Delivery Point, GW-198)
2. Operator: Williams Field Services Company  
Address: 188 CR 4900, Bloomfield, NM 87413  
Contact Person: David Bays      Phone: 505-634-4951
3. Location: Section 14      Township 29 North      Range 6 West  
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: David Bays

Title: Sr. Environmental Specialist

Signature:  \_\_\_\_\_

Date: June 30, 2005 \_\_\_\_\_

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



**29-6#3 Central Delivery Point**

**NMOCD  
Discharge Plan  
GW-198**

**Williams Field Services  
188 CR 4900  
Bloomfield, NM 87413**



## 29-6#3 Central Delivery Point NMOCD Discharge Plan

Effective Date:

June 2005

Page 1

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Figure 2 - Facility Plot Plan

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Appendix B – NMOCD Notification and Corrective Action

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## 29-6#3 Central Delivery Point NMOCD Discharge Plan

Effective Date:

June 2005

Page 2

### 1.0 TYPE OF OPERATION

The 29-6#3 CDP Compressor Station was constructed in 1995 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams Field Services (WFS) system.

### 2.0 LEGALLY RESPONSIBLE PARTY

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

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

### 3.0 LOCATION OF FACILITY

The facility is located in Section 14, Township 29 North, Range 6 West, in Rio Arriba County, New Mexico, approximately 3.5 miles north-northwest of Gobernador, New Mexico. The facility latitude and longitude are North 36° 43.820,77' and West 107° 25.743,57'. A site location map is attached (USGS 7.5 Min. Quadrangles: Four Mile Canyon and Gomez Ranch, New Mexico) as Figure 1.

### 4.0 LANDOWNER

Williams Field Services is leasing the subject property from:

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

### 5.0 FACILITY DESCRIPTION

This facility is a field compressor station and is un-manned. The site has been permitted to allow operation of two (2) 1355 site-rated hp engines and one (1) dehydrator. Currently, only engine exists at the site. Compressors and dehydrators may be installed or removed to meet demand. The facility layout is illustrated in Figure 2.

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

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



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

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

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

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

## 8.0 STORM WATER PLAN

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

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

### 8.1 Site Assessment and Facility Controls

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

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms, curbs, or emergency response actions, could flow overland to open off-site drainage ditches (arroyos) and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.



## 8.2 Best Management Practices

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

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

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

## 9.0 INSPECTION, MAINTENANCE AND REPORTING

Williams personnel will operate and maintain the compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through Gas Dispatch. The facility will be visited several times per week at a minimum, and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

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

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

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

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



## 11.0 SITE CHARACTERISTICS

The 29-6#3 Compressor Station is located on Frances Mesa. The site elevation is approximately 6780 feet above sea level. The natural ground surface topography slopes downward toward the southeast. The maximum relief over the site is approximately 10 feet.

Intermittent flow from the site will follow the unnamed drainage towards the southwest. The drainage flows approximately 3.6 miles to Gobernador Canyon Wash. Gobernador Canyon Wash flows into the San Juan River approximately 16.5 miles west of the site. The San Juan River, at approximately 5,650 feet in elevation, is the nearest down-gradient perennial source of surface water to the site.

A review of the available hydrologic data (1,2) for this area revealed that there is one water well within a 1-mile radius of 29-6#3 CDP and one well located just over a mile from the site. The closest well is approximately ½ to ¾ miles southeast of the site. The well was drilled to a depth of 900 feet, with depth to water at 620 feet. The water-bearing unit in this area is sandstone. The total dissolved solids concentration of area ground water ranges from 200 to 2000 parts per million.

The table below presents available information provided for each of the three wells.

Township; Range; Section	Quarter <sup>a</sup>	Apx. Distance from Site (mi)	Well #	Use <sup>b</sup>	Well Depth (ft)	Water Bearing Stratifications (ft)	Description	Depth to Water (ft)
29N; 6W; 13	341	0.5-0.75	SJ 03364	Stk	900	620-?	Sandstone	620
29N; 6W; 12	222	1.0-1.25	SJ 02794	Dom	280	145-200	Sandstone	140

Note a: 1=NW/4; 2=NE/4; 3=SW/4; 4=SE/4

Note b: dom = domestic; stk = livestock watering

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

### References

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

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

## 12.0 FACILITY CLOSURE PLAN

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

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



29-6#3 Central Delivery Point NMOCD Discharge Plan

Effective Date:

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

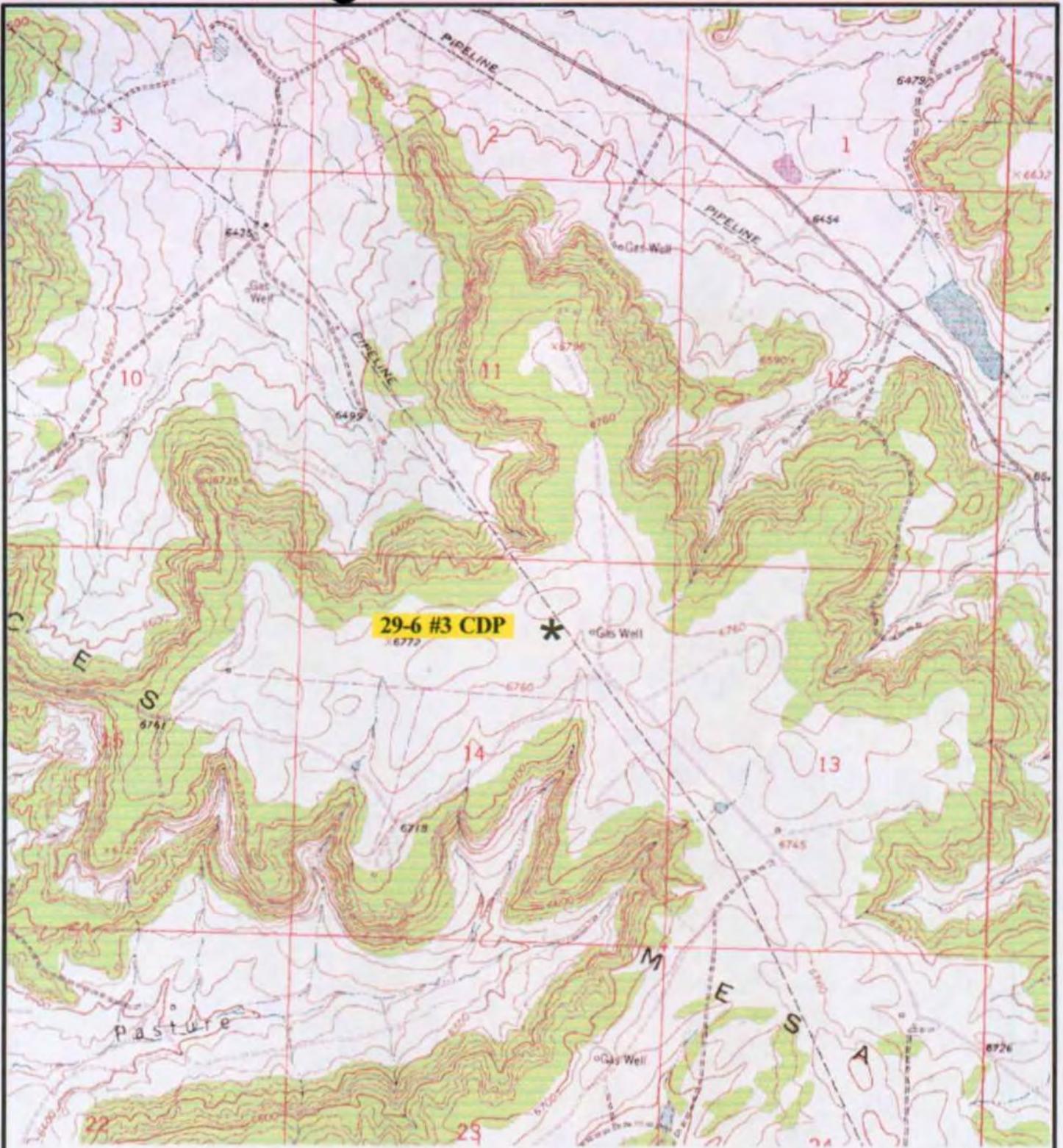
**TABLE 1**  
**SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS**  
**29-6#3 CENTRAL DELIVERY POINT**

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	100-500 gallons/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	20-60/year/engine	No Additives
Condensate/Produced Water	Scrubber	200-3000 barrels/year	No Additives
Produced Water	Scrubber	200-3000 barrels/year	May contain trace lube oil
Waste Water	Compressor Skid	500-3000 gallons/year/engine	Biodegradable soap and tap water w/ traces of oil
Used/Off-spec Glycol	Dehydrator	0-50 gal/year	No Additives
Used/Off-spec Antifreeze	Natural gas compression	0-200 gal/year	No Additives
Used Process Filters	Air	25-100/year	No Additives
Empty Drums/Containers	Liquid Containers	0-20/year	No Additives
Spill Residue ( i.e. soil, gravel, etc)	Incident Spill	Incident Dependent	Incident Dependent
Used Absorbents	Incident Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives

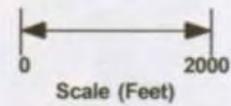
**TABLE 2**  
**TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS**  
**29-6#3 CENTRAL DELIVERY POINT**

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	500 gal tank for each engine	Metal tank	Non-exempt	Transported to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Condensate	Above Ground Storage Tank	8820 gal	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Produced Water	Above Ground Storage Tank	2940 gal	Earthen berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Waste Water	Above Ground Storage Tank	740 gal	Dual wall	Non-Exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm or transported to a Williams or Contractor facility.	Non -exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Antifreeze Tank	Above Ground Storage Tank	300 gal	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol	Above Ground Storage Tank	50 gal overflow; 100 gal day tank	Skid	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Spill Residue (i.e., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Lube Oil	Above Ground Storage Tank	500 gal tank for each engine	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

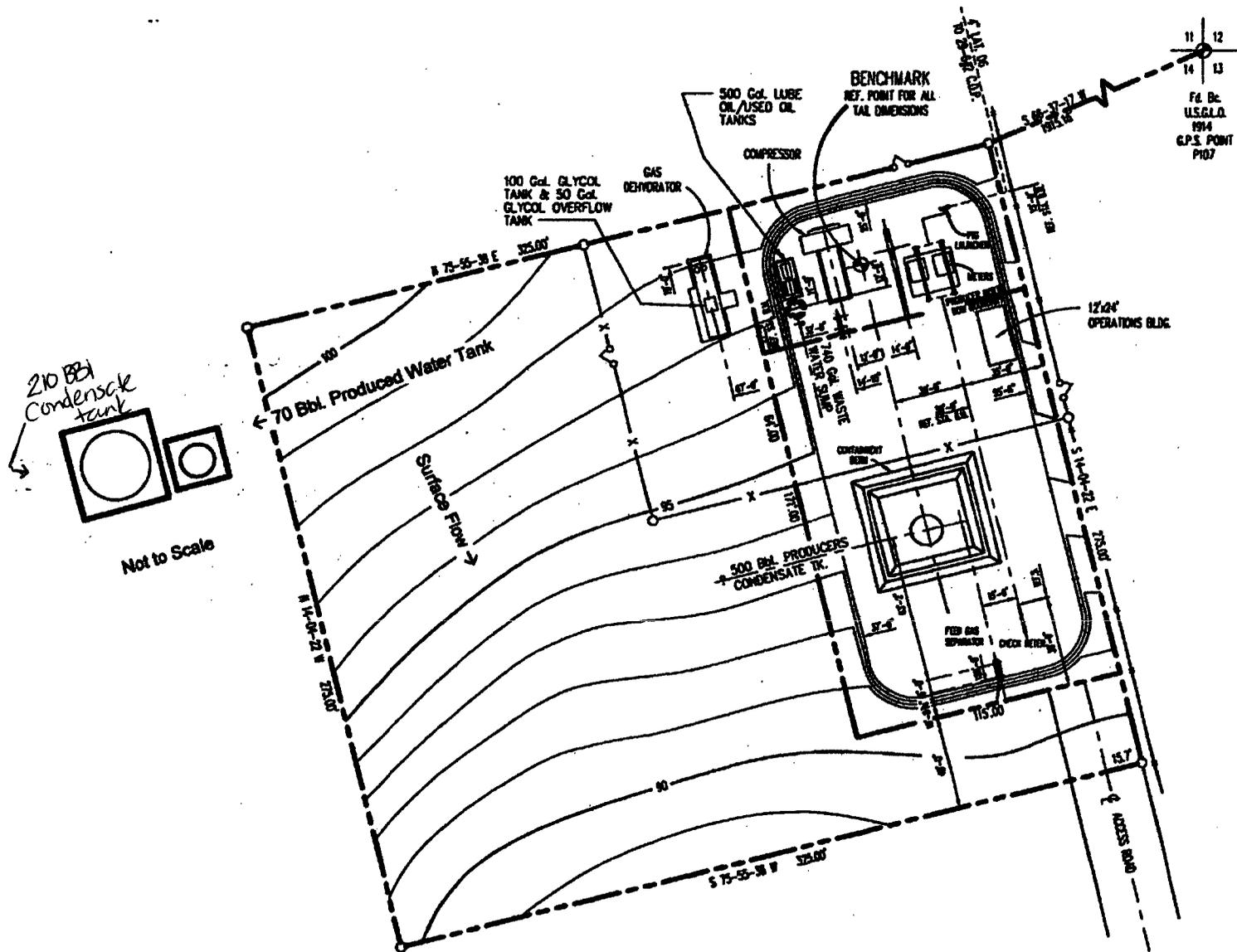
**FIGURES**



Source: USGS Four Mile Canyon and Gomez Ranch,  
 NM Quadrangles



**Figure 1 Site Vicinity / Topographic Map**  
**29-6 #3 CDP Compressor Station**  
 Section 14, Township 29N Range 6W  
 Rio Arriba County, New Mexico



11 12  
14 13  
Ft. Dc.  
U.S.G.L.D.  
1994  
G.P.S. POINT  
P107

210 Bbl  
Condensate  
tank  
Not to Scale

Williams Field Services  
29-G #3 CDP  
Plot Plan

# **APPENDICES**

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

**RELEASE/SPILL REPORTING**

**MATERIAL SAFETY DATA SHEETS**

**CHEMICAL EXPOSURES/POISONINGS**

**Dial**

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

**1-888-677-2370**

Info you should have when calling:

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



**3E COMPANY**

1905 Aston Avenue, Carlsbad, CA 92008

Telephone: 760-602-8700

Fax: 760-602-8888

**Release/Spill Report Form**

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

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

 Product Released:  Total BBL's Released   
 Cause of Release:  BBL's Recovered Wet   
 Released To:  Other:  BBL's Recovered Soil   
 BBL's Not Recovered   
 Remarks:   
 Origin Of Release:   
 Temperature  Relative Humidity  Precipitation   
 Cloud Cover  Wind Speed  Wind Direction   
 Injury  Death  Fire  Explosion   
 Unconsciousness  Hospitalization   
 Loss/Damage Estimate   
 Incident Investigator:   
 Environmental Contact for this Release:   
 Safety Contact for this Release:   
 Compliance Administrator for this area:   
 Form completed by:   
 Completion Date:   
 Form was e-mailed to Williams on:

	<b>System Integrity Plan</b>	System Integrity Plan	Document No. 6.04-ADM-002	
		Revision No: 7	Effective Date: 01/01/05	Page: 1 of 10
Procedure: <b>RELEASE REPORTING</b>				

## 1.0 PURPOSE

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

**Note 1:**

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

**Note 2:**

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

## 2.0 PROCEDURE

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

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

2.1.1.1 Any release that causes sheen on water.

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

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

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

2.2.1.1 Any Gas release >50 MSCF;

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

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

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

### 2.3 Onshore Releases

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

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

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

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

**2.4 Planned / Scheduled Blowdowns**

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

**2.4.3 The Environmental Specialist will:**

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

**2.5 Exceptions to Procedure:**

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

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

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

**2.6 Release Database**

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

### 3.0 REFERENCES

#### 3.1 Regulatory

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

3.1.2 49 CFR 191, 192 and 195

#### 3.2 Related Policies/Procedures

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

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

#### 3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

### 4.0 DEFINITIONS

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

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

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

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

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

➤➤➤End of Procedure<<<

## System Integrity Plan Change Log

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

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

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

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

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

## 1.0 PURPOSE

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

## 2.0 PROCEDURE

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

describes the procedures for responding to a spill.

**NOTE**

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

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

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

### 3.0 REFERENCES

#### 3.1 Regulatory

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

#### 3.2 Related Policies/Procedures

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

#### 3.3 Forms and Attachments

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

### 4.0 DEFINITIONS

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

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

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

**4.17 USCG** – United States Coast Guard

➤➤➤End of Procedure<<<

**System Integrity Plan Change Log**

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

	2.5	New Routine releases of storm water from containment areas shall be documented on <u>WES-87 – Record of Secondary Containment Discharge</u> . All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
	2.5	<p>Deleted:</p> <p>When to Initiate</p> <p>2.5.1 The first person to discover a spill/release at a facility will immediately take appropriate action to protect life, and ensure safety of personnel. An attempt will be made to mitigate the effects of the spill by terminating operations, closing valves, or taking other measures to stop the leak or spill as long as personnel are not in danger.</p> <p>2.5.2 For onshore releases: If the spill is reportable (refer to <u>6.04-ADM-002 - Release Reporting</u> procedure), the appropriate person (usually person discovering the release) will immediately notify the 24 hour O&amp;TS release hotline at 1-888-677-2370 and, if necessary, local emergency response personnel/contractors.</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p><b>NOTE</b></p> <p>The current 24 hour O&amp;TS release hotline is managed by a contractor, 3E. 3E provides 24-hour service/support, to include reporting major incidents and providing on-demand MSDSs.</p> </div> <p>2.5.3 Offshore releases: If the spill creates a sheen (refer to <u>6.04-ADM-002 - Release Reporting</u> procedure), the appropriate person (usually person discovering the release) will immediately notify O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and the Environmental Specialist or his/her management team.</p> <p>2.5.4 Receiving and reviewing the initial release report</p> <p>2.5.4.1 Onshore releases: Within 24 hours, 3E will distribute an initial release report to the Area. The initial distribution will be made via Area e-mail boxes.</p> <p>2.5.4.2 Each person that receives an initial report is required to review the report for correctness and clarity. All corrections must be provided to 3E in a return e-mail within 4 working days of receipt.</p> <p>2.5.4.3 Offshore releases: The ES will complete the <u>WES-35 - Release Report Form</u> and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt.</p> <p>2.5.5 Receiving a final release report</p>

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

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

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

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised October 10, 2003

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

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

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

Surface Owner	Mineral Owner	Lease No.
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**LOCATION OF RELEASE**

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

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

**NATURE OF RELEASE**

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

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

Describe Area Affected and Cleanup Action Taken.\*

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

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

\* Attach Additional Sheets If Necessary

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

## PUBLIC NOTICE

### Notice of Discharge Plan Renewal Application

#### 29-6#3 Central Delivery Point

Pursuant to the requirements of the New Mexico Water Quality Control Commission Regulation 20 NMAC 2.6.2 – GROUND AND SURFACE WATER PROTECTION, Williams Field Services Company of 188 County Road 4900, Bloomfield, NM 87413, hereby announces intent to apply to the New Mexico Oil Conservation Division to renew the Discharge Plan for the 29-6#3 Central Delivery Point. Williams expects to submit the permit application to the Oil Conservation Division in June 2005.

The facility, located in Section 14, Township 29 North, Range 6 West, Rio Arriba County, New Mexico, approximately 3.5 miles north-northwest of Gobernador, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to exceed 100 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

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



Four Corners Area  
 Environmental Department  
 #188 County Road 4900  
 Bloomfield, N.M. 87413  
 Phone: (505) 632-4825  
 Fax: (505) 632-4781

June 8, 2005

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted 29-6#3 Central Delivery Point (GW-198). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during June 2005.

The facility, located in Section 14, Township 29 North, Range 6 West, Rio Arriba County, New Mexico, approximately 3.5 miles north-northwest of Gobernador, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to exceed 100 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,

Clara Garcia  
 Environmental Compliance Administrator

7005 0390 0005 7906 8000

U.S. Postal Service <sup>TM</sup>		<b>CERTIFIED MAIL<sup>TM</sup> RECEIPT</b>	
(Domestic Mail Only; No Insurance Coverage Provided)			
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>			
<b>OFFICIAL USE</b>			
FARMINGTON, NM 87401			
Postage	\$ 0.37	UNIT ID: 0012	
Certified Fee	2.30	SdSN	
Return Receipt Fee (Endorsement Required)	1.75	Postmark Here	
Restricted Delivery Fee (Endorsement Required)		CLERK: K58093	
Total Postage & Fees	\$ 4.42	29-6 #3 DP	
Sent To	BLM		
Street, Apt. No., or PO Box No.	1235 N. La Plata Hwy		
City, State, ZIP+4	Farmington NM 87401		



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

June 8, 2005

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Robert and Patricia Trust  
 3 RD 2978  
 Aztec, NM 87410

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted 29-6#3 Central Delivery Point (GW-198). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during June 2005.

The facility, located in Section 14, Township 29 North, Range 6 West, Rio Arriba County, New Mexico, approximately 3.5 miles north-northwest of Gobernador, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to exceed 100 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,

Clara Garcia  
 Environmental Compliance Administrator

7005 0390 0005 7906 7996

U.S. Postal Service™		
<b>CERTIFIED MAIL™ RECEIPT</b>		
(Domestic Mail Only; No Insurance Coverage Provided)		
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>		
<b>OFFICIAL USE</b>		
AZTEC, NM 87410		
Postage	\$ 0.37	UNIT ID: 0012  CLEAR: K66093 11 015 29-6#3
Certified Fee	2.30	
Return Receipt Fee (Endorsement Required)	1.75	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 4.42	
Sent To		
Robert & Patricia Trust		
Street, Apt. No., or PO Box No.		
3 RD 2978		
City, State, ZIP+4		
Aztec NM 87410		
PS Form 3800, June 2002 See Reverse for Instructions		

## NOTA PUBLICA

La nota de la Aplicación de la Renovación del Plan de la Descarga

29-6#3 Central Delivery Point

Según los requisitos de la Regulación de la Comisión de Control de calidad de Agua de nuevo méxico 20 2.6.2 de NMAC – el SUELO Y la PROTECCION de AGUA de SUPERFICIE, William Field Services de 188 Camino de Condado 4900, Bloomfield, NM 87413, por la presente anuncian la intención para aplicar a la División de la Conservación del Petróleo de nuevo méxico para renovar el Plan de la Descarga para el 29-6#3 Central Delivery Point. William esperan someterse la aplicación del permiso a la División de la Conservación del Petróleo en junio 2005.

La facilidad, localizado en la Sección 14, Municipio 29 al norte, la Gama 6 al oeste, Condado de Rio Arriba, nuevo méxico, aproximadamente 3,5 del norte-noroeste de millas de Gobernador, proporciona gas natural la compresión y condicionar los servicios. Las direcciones del permiso de la descarga cómo rocian, los escapes, y otras descargas accidentales a la superficie se manejarán. La facilidad no descarga wastewater para surgir ni aguas subterráneas. Todo malgasta engendrado será almacenado temporalmente en tanques o contenedores con la contención secundaria. El desecho envió offsite se dispondrá o será reciclado en un OCD aprobó el sitio. En caso de una descarga accidental, molió agua muy probable no se afectará. La profundidad estimada de la agua del suelo en el sitio se espera exceder 100 pies. El suma se disolvió la concentración de sólidos de agua de suelo de área se espera estar en la gama de partes de 200-2,000 por millón.

Los comentarios o las indagaciones con respecto a este permiso o el proceso que permiten puede ser dirigido a:

Director de la División de la Conservación del Petróleo  
1220 Santo del sur Francis Dr.  
Santa Fe NM 87505  
(505) 827-1464

Refiérase por favor al nombre de la compañía y el nombre del sitio, como utilizado en esta nota, o mande una copia de esta nota al hacer las indagaciones, desde que el Departamento no podría haber recibido la aplicación en el tiempo de esta nota.