GW - 257

INSPECTIONS & DATA 1996 - 1998



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

September 14, 1998

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

Re: Underground Line Testing Results at various Williams Field Services Facilities

Dear Mr. Ford:

Enclosed, please find a copy of the results of the underground line testing that was performed at the Williams Field Services (WFS) facilities listed below.

Trunk C (GW-259) Hart Mountain (GW-208) Decker Junction (GW-134) Aztec (GW-155) Cedar Hill (GW-87) Horse Canyon (GW-61) 32-7 (GW-117) Carracas (GW-112) 32-8#3 (GW-116) Rosa #1 (GW-292) Manzanares (GW-62) Simms Mesa (GW-68) Trunk A (GW-248) 29-7 (GW-136) 30-5 (GW-108) 30-8 (GW-133) Trunk B (GW-249) 32-9 (GW-91) Kernaghan (GW-271) Trunk N (GW-306) 32-8#2 (GW-111)

Also Added :

Moore (64-273)

Pritchand (64-274)

Keinghan B-8 (GW-272)

If you have any questions concerning this submittal, please call me at 801-584-6543.

Sincerely, Ingrid Deklau Énvironmental Specialist

XC: Denny Foust, NM OCD

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DISTRIBUTION: ORIGINAL - Project Engineer, COPY - Compliance, COPY - Originator

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

November 13, 1996

Mr. Pat Sanchez 100 M3 Control 5 52 NMOCD 2040 South Pacheco Street Santa Fe, New Mexico 87505 RECEIVED

NOV 1 8 1996

Environmental Bureau Oil Conservation Division

RE: Response to Discharge Inspection Reports

Dear Mr. Sanchez:

Milagro GW-60

8. Lab wastes have been characterized and accepted for disposal per Philip Environmental's report dated, October 24, 1996.

Coyote Springs GW-250

- 1. The lube oil drum has been placed on pad and curb type containment.
- 2. Oil-absorbent pads and catch basins will be used to contain leaking lube oil.
- 3. A catch basin has been placed underneath the condensate storage tank load line.
- 6. Operators have been instructed in how to inspect leak detection,
- 7. Below-grade process/wastewater piping is pressure tested at the time of installation.

10. Oil spills from the compressor will be contained using oil-absorbent pads and catch basins.

Trunk A Compressor Station GW-248

No compliance issues noted.

Trunk B Compressor Station GW-249

No compliance issues noted.

Trunk C Compressor Station GW-257

No compliance issues noted.

Lateral N-30 GW-256

3. The condensate above-ground storage tank is not placed on an impermeable type pad. The tank and valving is visually inspected at least annually as stated in the WFS Policy and Procedures for Spill Prevention (Appendix B of the Discharge Plan). In lieu of the impermeable type pad, WFS will clean out and visually inspect the interior of the tank at the time of the Discharge plan renewal.

6. The below-grade sump is inspected monthly and documented in a monthly inspection log retained on site.

7. A copy of the hydrostatic test of underground process/wastewater piping is attached.

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

Sincerely,

Leigh E. Gooding / Sr. Environmental Specialist

cc: Denny Foust

PIPELINE FACILITY TEST REPORT

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

November 7, 1996

CERTIFIED MAIL RETURN RECEIPT NO. P-288-258-674

Ms. Leigh E. Gooding Williams Field Services P.O. Box 58900, M.S. 2G1 Salt Lake City, Utah 84158-0900

RE: Inspection Reports for GW-60, GW-248, GW-249, GW-250, GW-256, and GW-257 San Juan County, New Mexico

Dear Ms. Gooding:

The discharge plan inspection reports for the above captioned Williams Field Services Facilities are enclosed. Williams shall respond to each of the issues for each facility within 30 days of receipt of this letter and the enclosed inspection reports. Please send a copy of your response to OCD Santa Fe and the OCD Aztec District Office.

Williams Field Services continued commitment to the environmental quality of the State of New Mexico is appreciated. The OCD appreciates the professional conduct of WFS operations personnel who accompanied us during the inspections.

If you have any questions in the meantime feel free to give me a call at (505)-827-7156.

Sincerely,

Patricio W. Sanchez Petroleum Engineering Specialist, ² Environmental Bureau-OCD

xc: Mr. Denny Foust - OCD Aztec District Office.

DISCHARGE PLAN INSPECTION

FACILITY NAME: Trunk C "GW-257" LOCATION: SE/Y SW/4, Section 9, Township 31 North, Range 10 west, NMPM San Juan County, NM _____ DATE: 10126196 OWNER: Williams Field Scruices. OCD INSPECTORS: Donny Foust and Pat Sanchez "New Facility Discharge Plan inspection."

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

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

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

No Compliance issues.

No Compliance issues.

3. <u>Above Ground Tanks</u>: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.

No Compliance issues.

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

No Compliance issues. Saddle Tonle needs to be positioned on the pad/curb such that the dispenser would not drip on the ground.

5. **Tank Labeling**: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

No compliance issues. Note: 2 red "Jerry cons" or Flamable liquid containers were unlabeled.

6. 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 that do not have secondary containment and leak detection 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 /or sumps.

No compliance issues.

7. <u>Underground Process/Wastewater Lines</u>: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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 so that an OCD representative may witness the testing.

No compliance issues.

8. <u>Onsite/Offsite Waste disposal and storage practices</u>, are all non-exempt wastes properly characterized and disposed of? Does the facility have an EPA hazardous waste number?

No compliance issues.

9. <u>Class V Wells</u>: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

No compliance issues.

10. **Housekeeping**: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure. Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

No Compliance Issues.

11. **Spill Reporting**: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD District Office.

No compliance issues.

Does the facility have any other potential environmental concerns/issues? 12.

No compliance issues. Does the facility have any other environmental permits - i.e. SPCC, Storm water Plan, 13. etc? Nat asked of operations people - but New Mexico Air Quality permit on display.



GW-257 (PHOTOS BY OCD)



PHOTO NO. __

DATE: 10 /21/96



PHOTO NO.

DATE: 10/21/96