

GW - 306

**PERMITS,  
RENEWALS,  
& MODS  
Application**

RECEIVED

2008 JUN 2 PM 1:57  
**ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS**

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. The flat fee for a compressor station with a horsepower rating greater than 1001 horsepower is \$1700.00. Please submit this amount along with the signed certification item 23 of this document after the final permit is issued in approximately 30 days. Checks should be made out to the New Mexico Water Quality Management Fund.
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on July, 9<sup>th</sup>, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
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- 6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

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

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**16. OCD Inspections:** The OCD performed an inspection of this facility on April 24, 2008. Below are results of the inspection:

1. **Photo 1:** Unauthorized discharge near BGT. Unauthorized discharges are a violation of the discharge permit. Soil must be remediated. Williams Four Corners must not discharge on to the ground.
2. **Photo 2:** Williams Four Corners submitted applications do not indicate that the station has a pond. Ponds greater than 8 feet diameter must be netted. If a pond was added to the facility the OCD was never informed. If this was not intended to be a pond, fluids must be drained in a secondary containment within 72 hours. Williams Four Corners shall provide information to the OCD about this questionable "pond".
3. **Photo 3 & 5:** An unauthorized discharge near compressor. Soil must be remediated. Williams Four Corners must not discharge on to the ground.
4. **Photo 4:** White substances were located in the facilities land farm. Identify the substance. Landfarms are a discrete area used for remediation of petroleum hydrocarbon-contaminated soils ONLY. The OCD can not find any information within Williams discharge plan application that identifies a land farm on its facility. Please provide a history of this landfarm. Landfarms must be properly managed on a frequent basis and not left idle for great lengths of time.
5. **Photo 6 & 10:** All containers shall be properly identified and noted empty if so. All containers empty or full shall be located upon a secondary bermed containment. Properly locate all drums and containers.
6. **Photo 7:** Liquids in secondary containment shall be removed within 72 hours. Properly remove liquids.
7. **Photo 8 & 9:** An unidentified substance has leaked from building. Identify substance and remediate contaminated soil. Implement plan to prevent such discharge from reoccurring.

The OCD has witnessed several violations of Williams Four Corners discharge permit for its Trunk N compressor station. Williams Four Corners, LLC has **90 days** to address these concerns and submit to the OCD Santa Fe and Aztec office a report, with applicable photos, with resolution to these concerns.

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

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

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

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

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

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

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

Williams Four Corners, LLC

\_\_\_\_\_  
Company Name-print name above

David Bays

\_\_\_\_\_  
Company Representative- print name

David Bays  
\_\_\_\_\_  
Company Representative- Signature

Title \_\_\_\_\_ Sr. Environmental Specialist

Date: May 14, 2008

OCD Inspection: William Four Corners, Trunk N C.S. GW - 306

Inspectors: Brandon Powell and Leonard Lowe

Company Rep: Mr. David Bays

Date: 04.24.08

Time: 10:40 – 11:10

Page 1

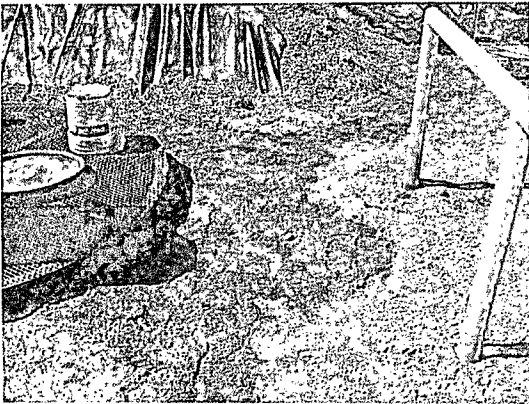


Photo 1: Soil staining near BGT, north of produced water tank.

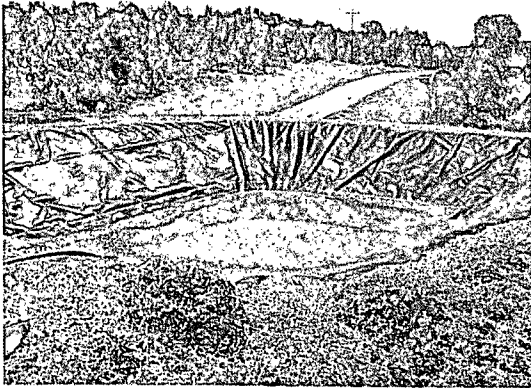


Photo 2: Large pond area south of produced water tank.

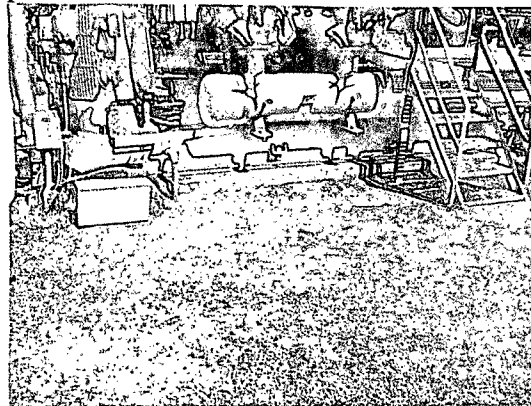


Photo 3: Assume hydrocarbon staining on ground near compressor.

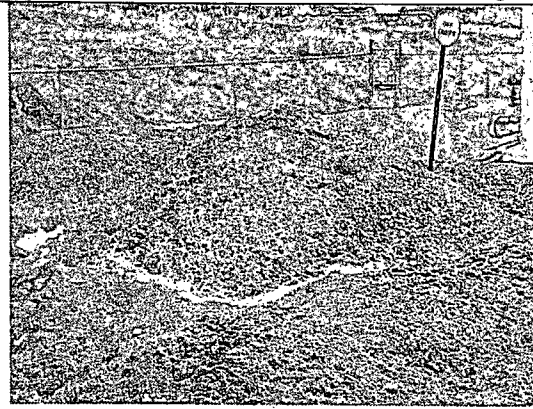


Photo 4: Land farm with unknown spherical white substance.

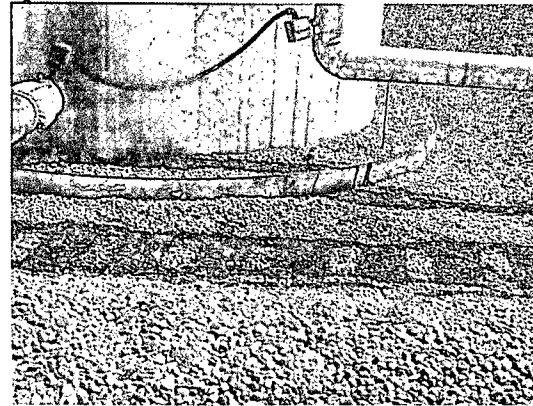


Photo 5: Gravel staining on ground/gravel.

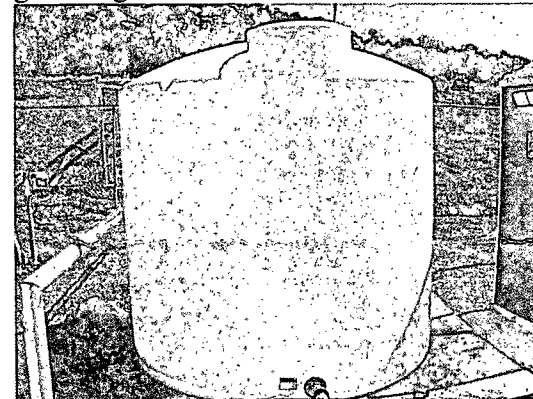


Photo 6: Container unlabeled with no berm or proper containment.



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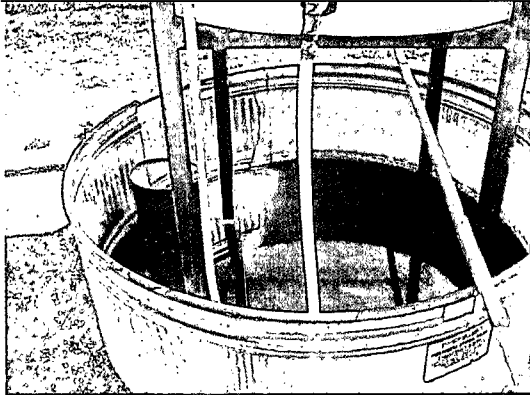


Photo 7: Liquids in secondary containment.

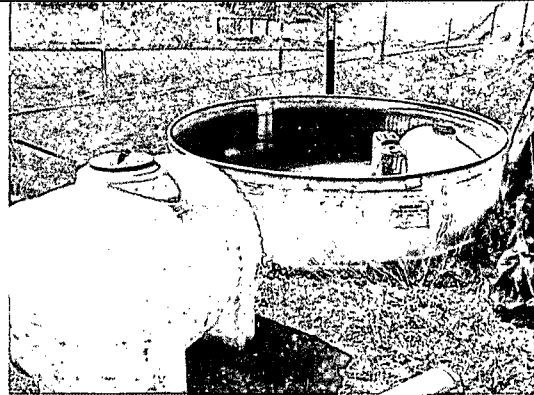


Photo 10: White container with no secondary containment.

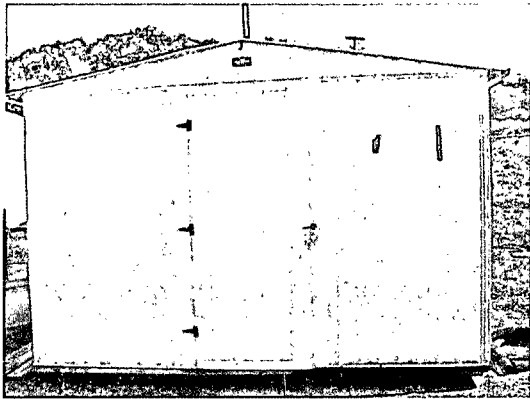


Photo 8: Building with leaking substance.

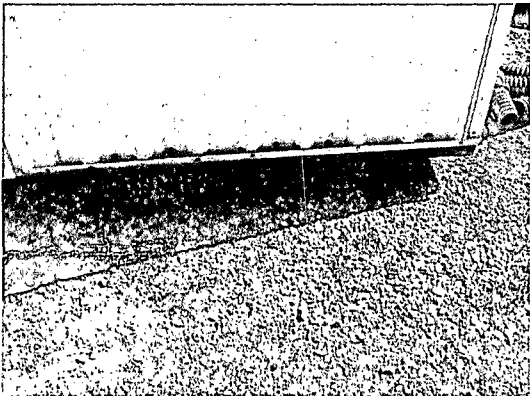


Photo 9: Area of leaking substance on to the ground.

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 5/15/08

or cash received on                      in the amount of \$ 1700<sup>00</sup>

from WILLIAMS FOUR CORNERS LLC

for GW-306

Submitted by: LAWRENCE ROMERO Date: 6/4/08

Submitted to ASD by: LAWRENCE ROMERO Date:                     

Received in ASD by:                      Date:                     


Filing Fee            New Facility            Renewal           

Modification            Other                     

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment



# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**

Governor  
Joanna Prukop  
Cabinet Secretary  
Reese Fullerton  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



May 9, 2008

Mr. David Bays  
Williams Four Corners, LLC  
188 Road 4900  
Bloomfield, New Mexico 87413

Re: Discharge Permit Renewal  
Trunk N Compressor Station (GW-306)  
NW/4 NE/4 Section 17, Township 32 North, Range 7 West, NMPM  
San Juan County, New Mexico

Dear Mr. Bays:

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

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

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

Sincerely,



Wayne Price  
Environmental Bureau Chief

Attachments-1  
xc: OCD District Office



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2. **Photo 2:** Williams Four Corners submitted applications do not indicate that the station has a pond. Ponds greater than 8 feet diameter must be netted. If a pond was added to the facility the OCD was never informed. If this was not intended to be a pond, fluids must be drained in a secondary containment within 72 hours. Williams Four Corners shall provide information to the OCD about this questionable "pond".
3. **Photo 3 & 5:** An unauthorized discharge near compressor. Soil must be remediated. Williams Four Corners must not discharge on to the ground.
4. **Photo 4:** White substances were located in the facilities land farm. Identify the substance. Landfarms are a discrete area used for remediation of petroleum hydrocarbon-contaminated soils ONLY. The OCD can not find any information within Williams discharge plan application that identifies a land farm on its facility. Please provide a history of this landfarm. Landfarms must be properly managed on a frequent basis and not left idle for great lengths of time.
5. **Photo 6 & 10:** All containers shall be properly identified and noted empty if so. All containers empty or full shall be located upon a secondary bermed containment. Properly locate all drums and containers.
6. **Photo 7:** Liquids in secondary containment shall be removed within 72 hours. Properly remove liquids.
7. **Photo 8 & 9:** An unidentified substance has leaked from building. Identify substance and remediate contaminated soil. Implement plan to prevent such discharge from reoccurring.

The OCD has witnessed several violations of Williams Four Corners discharge permit for its Trunk N compressor station. Williams Four Corners, LLC has **90 days** to address these concerns and submit to the OCD Santa Fe and Aztec office a report, with applicable photos, with resolution to these concerns.

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

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

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

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

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



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

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

\_\_\_\_\_  
Company Name-print name above

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- Signature

Title\_\_\_\_\_

Date:\_\_\_\_\_

OCD Inspection: William Four Corners, Trunk N C.S. GW - 306

Inspectors: Brandon Powell and Leonard Lowe

Company Rep: Mr. David Bays

Date: 04.24.08

Time: 10:40 – 11:10

Page 1



Photo 1: Soil staining near BGT, north of produced water tank.



Photo 2: Large pond area south of produced water tank.

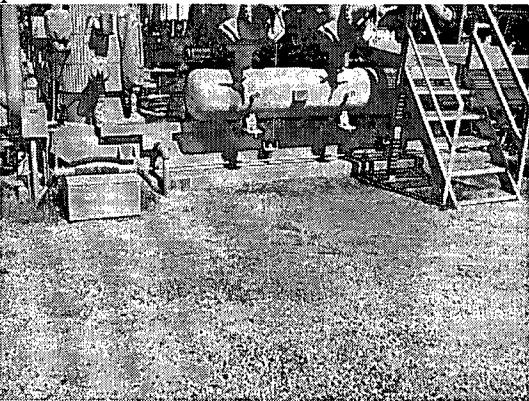


Photo 3: Assume hydrocarbon staining on ground near compressor.

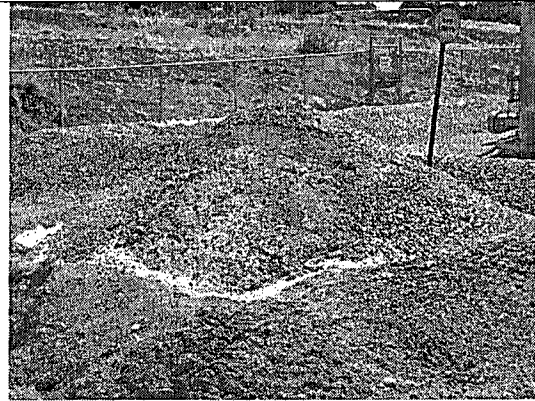


Photo 4: Land farm with unknown spherical white substance.



Photo 5: Gravel staining on ground/gravel.

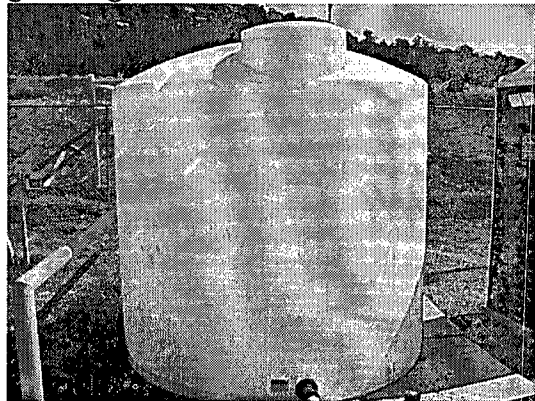


Photo 6: Container unlabeled with no berm or proper containment.

OCD Inspection: William Four Corners, Trunk N C.S. GW - 306

Inspectors: Brandon Powell and Leonard Lowe

Company Rep: Mr. David Bays

Date: 04.24.08

Time: 10:40 – 11:10

Page 2

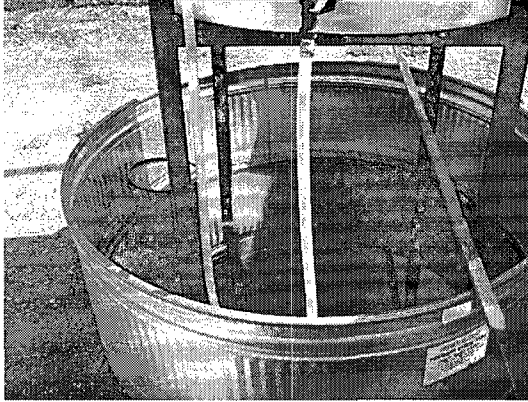


Photo 7: Liquids in secondary containment.

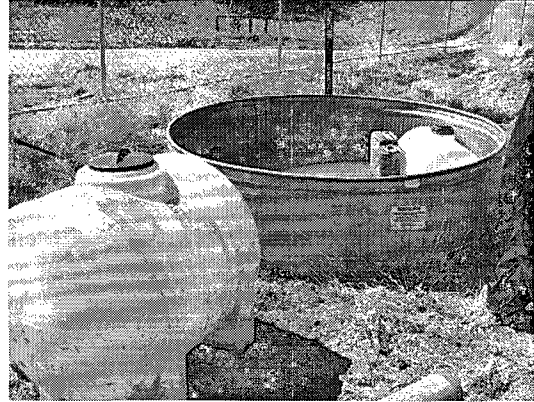


Photo 10: White container with no secondary containment.

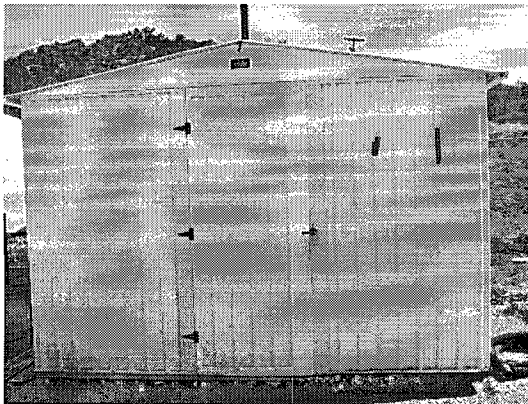


Photo 8: Building with leaking substance.

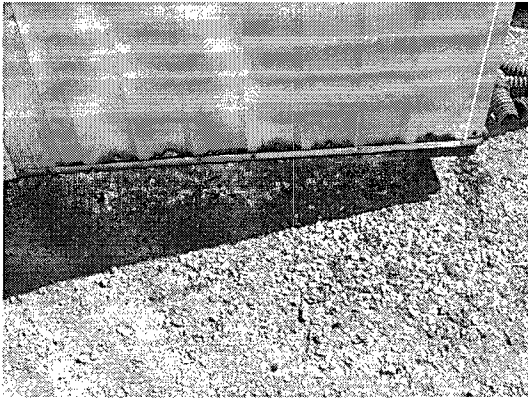


Photo 9: Area of leaking substance on to the ground.



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

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

Director

**Oil Conservation Division**

March 3, 2008

Mr. David Bays  
Williams Four Corners, LLC  
188 Road 4900  
Bloomfield, New Mexico 87413

**Re: Discharge Plan Renewal Permit GW-306  
Williams Four Corners, LLC  
Trunk N Compressor Station  
San Juan County, New Mexico**

Dear Mr. Bays:

The New Mexico Oil Conservation Division (NMOCD) has received William's Four Corners, LLC. Company's request and initial fee, dated February 27, 2008 to renew GW-306 for the Williams Four Corners, LLC Trunk N Compressor Station located in the NW/4 NE/4 of Section 17 and Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico. The initial submittal has provided the required information in order to deem the application "administratively" complete.

The submitted applicant public notice has been demonstrated to the NMOCD and found to meet the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC. Once the Public Notice has been submitted to the Farmington Daily Times, please return to the NMOCD a proof of publication affidavit. The NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

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

Sincerely,

Leonard R. Lowe  
Environmental Engineer

LRL/lrl

xc: OCD District III Office, Aztec



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor  
**Joanna Prukop**  
Cabinet Secretary

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

Director  
Oil Conservation Division

March 3, 2008

Mr. David Bays  
Williams Four Corners, LLC  
188 Road 4900  
Bloomfield, New Mexico 87413

Re: Discharge Permit Renewal  
Trunk N Compressor Station (GW-306) **DRAFT**  
NW/4 NE/4 Section 17, Township 32 North, Range 7 West, NMPM,  
San Juan County, New Mexico

Dear Mr. Bays

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

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

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

Sincerely,

Wayne Price  
Environmental Bureau Chief

LWP/lrl

Attachments-1  
xc: OCD District Office

## ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (see WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. **The flat fee for a compressor station with a horsepower rating greater than 1001 horsepower is \$1700.00. Please submit this amount along with the signed certification item 23 of this document after the final permit is issued in approximately 45 days. Checks should be made out to the New Mexico Water Quality Management Fund.**
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on July 09, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- 5. Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- 6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class

II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

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

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

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

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

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

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

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

**A.** All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein.

Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

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

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

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

## **12. Underground Process/Wastewater Lines:**

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

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



**13. Class V Wells:** The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells, that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

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

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

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

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

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

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

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

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

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

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

\_\_\_\_\_  
Company Name-print name above

\_\_\_\_\_  
Company Representative- print name

\_\_\_\_\_  
Company Representative- Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date:

## NOTICE OF PUBLICATION

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

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

**(GW-306) Williams Four Corners., Mr. David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their Trunk N Compressor Station, located in the NW/4 NE/4 of Section 17, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico, approximately 15 miles northeast of Archuleta, New Mexico. The station provides metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery. Approximately 2000-8000 bbl/year of produced water/natural gas condensate; 100-5000 gal/year/unit of waste water and 500-2000 gal/year/engine of used engine oil are generated and stored in OCD approved containers onsite within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 200-500 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.**

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

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

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México

(Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 3rd day of March, 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

**Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Monday, March 03, 2008 2:33 PM  
**To:** 'Bays, David'  
**Cc:** 'Deklau, Ingrid'; Hansen, Edward J., EMNRD  
**Subject:** GW-306, Administratively Complete  
**Attachments:** GW-306, Admin.Comp.pdf; GW-306 DRAFT Permit.pdf; GW-306 OCD PN.pdf

Mr. David Bays,

Your submitted application for the, GW-306, Trunk N Compressor Station Discharge Plan application has been determined to be Administratively Complete.

Attached are the Admin. Complete Letter, Draft Permit and the NMOCD version of Public Notice for your records.

Your submitted Public Notice has been approved for publishing. Please submit to our office the proof of publication affidavit for both English and Spanish versions.

If you have any questions please feel free to contact me.

Thank you for your attention.

llowe

**Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/oed/>

3/3/2008

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 2/27/08

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

from Williams Four Corners LLC

for GW-306

Submitted by: Lawrence Romero Date: 3/5/08

Submitted to ASD by: Lawrence Romero Date: 3/5/08

Received in ASD by:                                      Date:                     

Filing Fee ✓ New Facility            Renewal ✓

Modification            Other                                     

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment            or Annual Increment

# *Cirrus Consulting, LLC*

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February 27, 2008

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

Subject: Discharge Plan Renewal Applications  
Williams Four Corners, LLC Trunk N Compressor Station (GW-306)

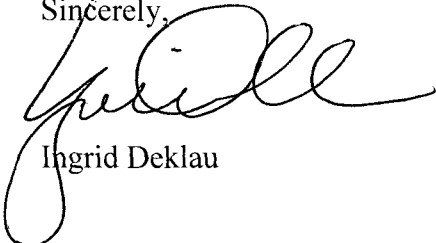
Dear Mr. Price:

On behalf of Williams Four Corners, LLC, Cirrus Consulting, LLC is pleased to submit Discharge Plan renewal applications for the Trunk N Compressor Station (GW-306).

Enclosed are two copies of the application and a check for \$100 for the filing fee.

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

Sincerely,



Ingrid Deklau

xc: Brandon Powell, OCD District 3  
David Bays

RECEIVED  
2008 FEB 29 PM 12 30

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

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

Revised June 10, 2003

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

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

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

☐ New      ☒ Renewal      ☐ Modification

1. Type: Natural Gas Compressor Station (Trunk N Compressor Station, GW-306)
2. Operator: Williams Four Corners, LLC  
Address: 188 County Road 4900, Bloomfield, NM 87413  
Contact Person: David Bays Phone: (505) 634-4951
3. Location: NW/4 NE/4 Section 17 Township 32N Range 7W
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average daily quality and daily volume of waste water must be included.
8. Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other rules, regulations, and/or orders.
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: David Bays Title: Environmental Specialist  
Signature: David Bays Date: February 25, 2008  
E-Mail Address: david.bays@williams.com





## **Trunk N Compressor Station**

NMOCD Discharge Plan  
GW-306 Renewal

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

March 2008

**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 Trunk N Compressor Station is a compressor station owned and operated by Williams Four Corners, LLC (Williams). The site was built in 1998 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery. The site is permitted for eight Waukesha 7042GL Reciprocating Compressor Engines (site-rated compressor horsepower is 1368 hp or less) and five glycol dehydrators; however only six engines and no dehydrators are currently installed at the site. Compressors and dehydrators may be installed or removed to meet demand. In addition, there are various storage tanks, support structures and ancillary equipment.

**Item 2**

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

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

<b>Local Representative</b>	David Bays Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 634-4951
-----------------------------	--

**Item 3**

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

San Juan County, New Mexico  
Township 32 North, Range 7 West, NW/4 NE/4 Section 17  
The topographic map is attached as Figure 1.

**Item 4**

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

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

**Item 5**

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

The 400-bbl produced water tank was replaced with an 800-bbl produced water tank, and the 740-gal waste water sump was replaced with a 1680-gal waste water sump. There are no changes to the facility plot plan; however, it is included with this document as Figure 2.

**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 to this section. See information on-file at OCD. Additionally, Table 1 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

**Item 9**

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

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

**Item 10**

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

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

**Item 11**

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

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

**Item 12**

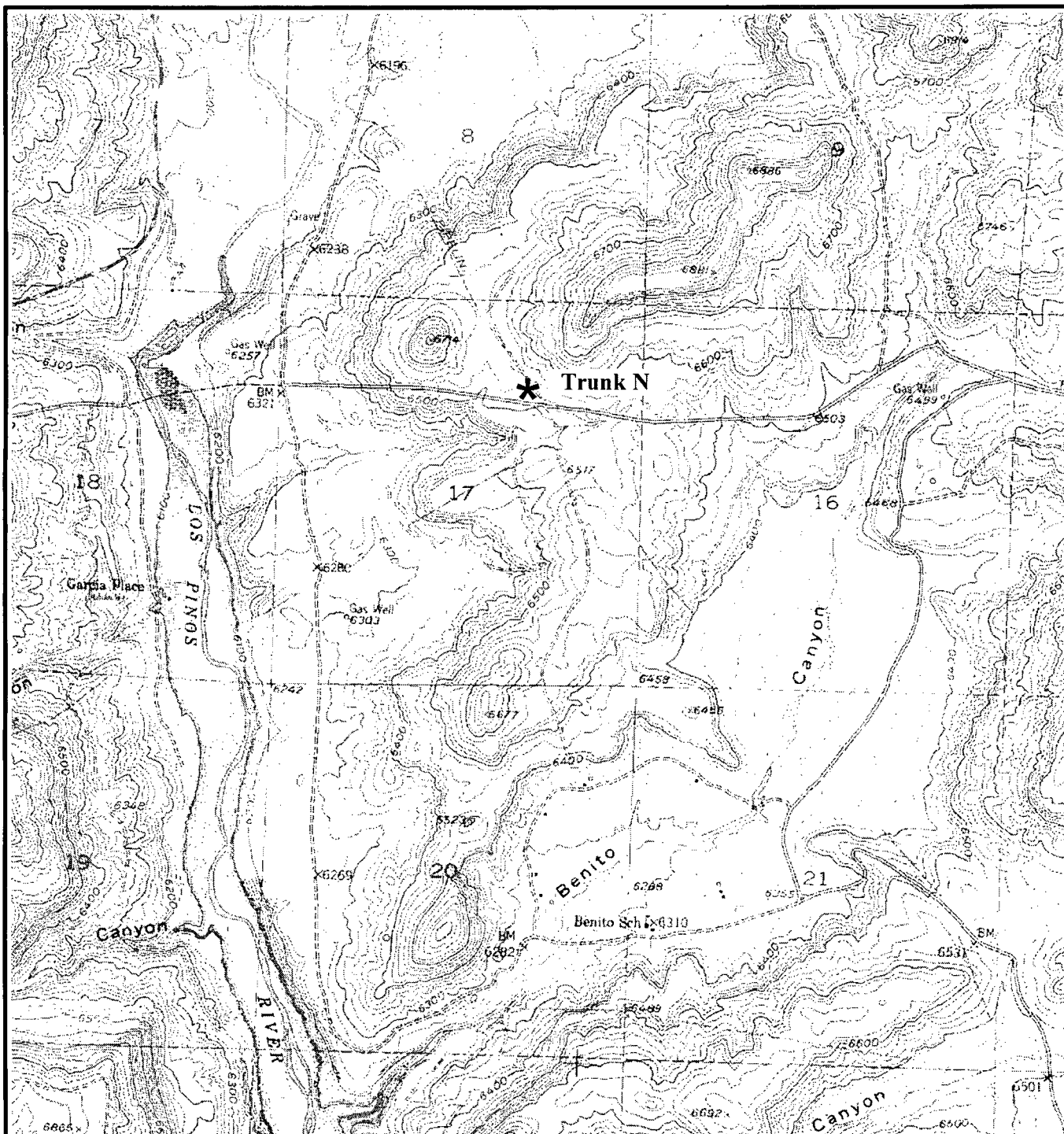
*Attach ecological/hydrological information for the facility. Depth to and quality of groundwater must be included.*

A current well search was performed for this renewal application. There is no new information to report for this item. See information on-file at OCD.

**Item 13**

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

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



Source: USGS Burnt Mesa, New Mexico Quadrangle

0 2000  
Scale (Feet)



**Figure 1 Site Vicinity / Topographic Map**  
**Trunk N Compressor Station**  
 Section 17, Township 32N Range 7W  
 San Juan County, New Mexico

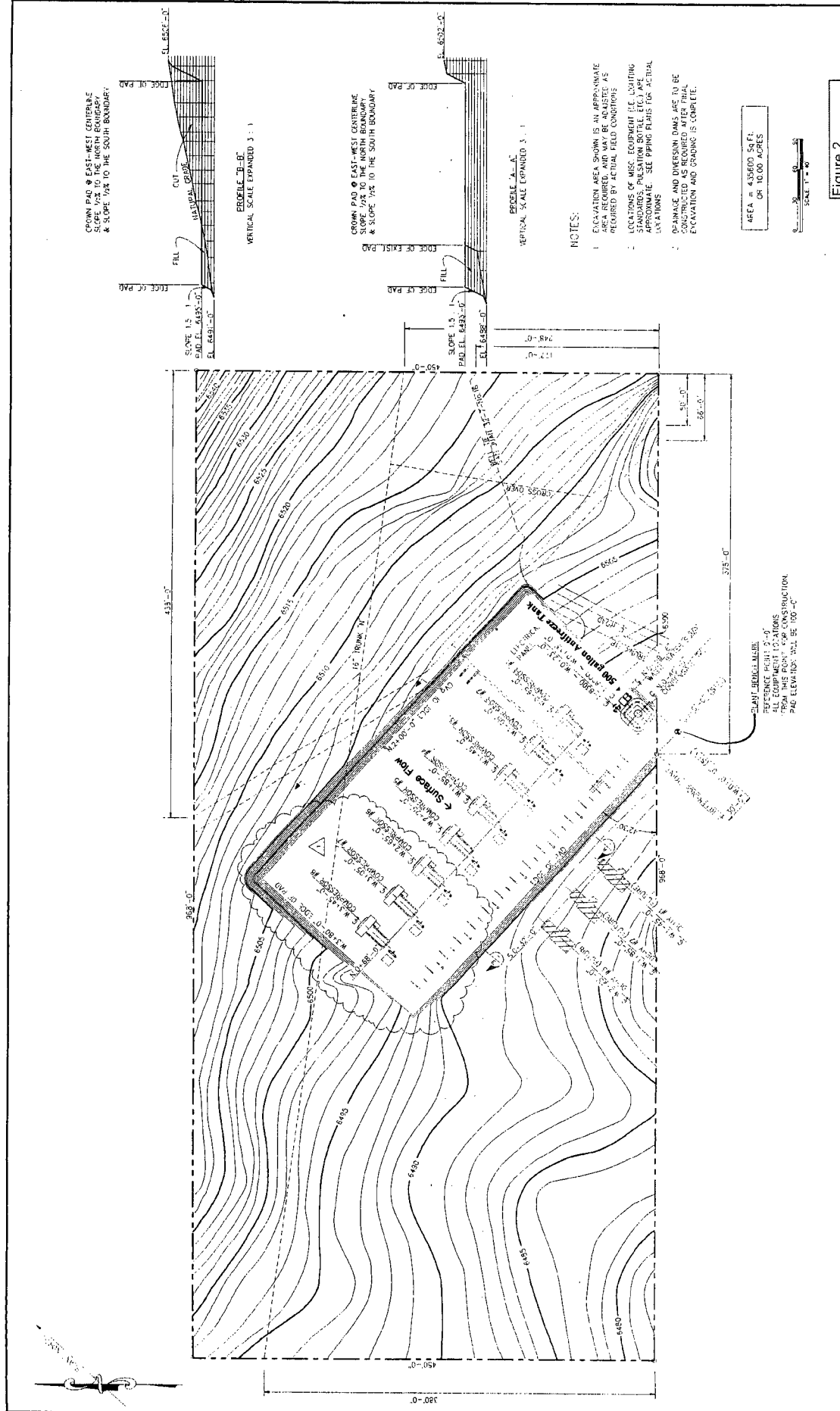


Figure 2

				<b>WILLIAMS ENERGY GROUP</b> ONE OF THE WILLIAMS COMPANIES, INC.		<b>SAN JUAN TRUNK "N"</b> COMPRESSOR STATION EXCAVATION & SITE LAYOUT		SCALE: 1" = 40'-0" SHEET NO. TEN-1-M1	
DATE 1/27/2010		BY J. J. JONES		CHECKED J. J. JONES		DATE 1/27/2010		PROJECT APPROVED C. B. J. JONES	
DATE 1/27/2010		BY J. J. JONES		CHECKED J. J. JONES		DATE 1/27/2010		PROJECT APPROVED C. B. J. JONES	
DESCRIPTION EXCAVATION		NO. 1		DATE 1/27/2010		PROJECT APPROVED C. B. J. JONES		SHEET NO. TEN-1-M1	
REFERENCE MARKINGS		RETURN		RETURN		RETURN		RETURN	

**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	(8) 500 gal*	Berm or concrete pad and wastewater system	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Produced Water/Natural Gas Condensate	Above Ground Storage Tank	800 bbl	Berms	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at 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.
Wash-down Water	Below Grade Sump	1680 gal	Dual-walled tanks	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 that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste.
Used Oil Filters	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at 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.
Used Process Filters	Drum or other container	Varies	Transported in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Spill Residue (e.g., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non-exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	500 gal	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	(1) 500 gal* (5) 100 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	(8) 500 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Produced Water/Natural Gas Condensate	Inlet Scrubber, Gas Inlet Separator, Dehydrators	2000-8000 bbl/year	No Additives
Waste Water /Wash Down Water	Compressor and Dehy Skids	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	50-500/year/engine	No Additives
Used Process Filters	Charcoal, Activated Carbon, Molecular Sieve	50-500 cubic yd/yr	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol	75-500/year	No Additives
Empty Drums/Containers	Liquid Containers	0-80/year	No Additives
Spill Residue ( i.e. soil, gravel, etc)	Incidental Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incidental Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives



See attached DRAFT Public Notice, to include the following:

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



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

March XX, 2008

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

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

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC submitted to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Trunk N Compressor Station (GW-306) in March 2008. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations.

The facility, located in the NW/4, NE/4 Section 17, Township 32 North, Range 7 West, San Juan County, New Mexico, lease NM 102417, approximately 15 miles northeast of Archuleta, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100–5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be in the range of 200-500 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,

David Bays  
Sr. Environmental Specialist

## **PUBLIC NOTICE**

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in March 2008 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-306 for their Trunk N Compressor Station located in the NW/4, NE/4 of Section 17, Township 32 North, Range 7 West in San Juan County, New Mexico. The facility, located approximately 15 miles northeast of Archuleta, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100–5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be in the range of 200-500 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, presentaron una aplicación de renovación en el marzo de 2008 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para la descarga antes aprobada planean GW-306 para su Trunk N Compressor Station localizada en el NW/4, NE/4 de la Sección 17, Municipio 32 Norte, Recorren 7 Oeste en San Juan County, New Mexico. La instalación, nordeste de aproximadamente 15 millas localizado de Archuleta, proporciona servicios de acondicionamiento y compresión de gas naturales.

El plan de descarga se dirige como las caídas, los agujeros, y otras descargas casuales a la superficie serán manejados. Los materiales típicos generados o usados en la instalación incluyen el echar agua condensado/producir de gas natural, el petróleo de lubricación nuevo y usado, echar agua de desecho aceitoso del equipo se lavan abajo, y glicol. La cantidad de wastewater generado es 100 – 5000 galones por año por motor. La instalación no descarga para revestir o subrevestir los echares agua, y por lo tanto la cantidad y la calidad de las descargas no son aplicables. Toda la basura generada será temporalmente almacenada en tanques o contenedores equipados con la contención secundaria. La basura transportó offsite será dispuesto o reciclado en una instalación permitida por la agencia estatal, federal, o tribal recibir tal basura. Se espera que la profundidad de agua subterránea estimada en el sitio esté en la variedad de 200-500 pies. El total se disolvió se espera que la concentración de sólidos del agua subterránea de área esté en la variedad de 200-2,000 partes por millón.

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

ATTACHMENT TO THE DISCHARGE PLAN GW-306  
WILLIAMS FIELD SERVICES COMPANY  
TRUNK N COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(April 21, 2003)

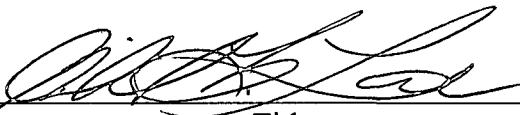
1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. The \$1,700.00 required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Company Commitments: Williams Field Services Company will abide by all commitments submitted in the discharge plan renewal application dated March 19, 2003 and these stipulations for renewal.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans that are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge 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: Williams Field Services Company shall maintain storm water runoff controls. As a result of Williams Field Services Company's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services Company shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Williams Field Services Company shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Trunk N Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk N Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES COMPANY

by 

Title

Environmental Specialist  
Michael K. Lane



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**  
Cabinet Secretary

**Lori Wrotenberg**

Director

**Oil Conservation Division**

April 21, 2003

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

**RE: Discharge Plan Renewal GW-306  
Williams Field Services Company  
Trunk N Compressor Station  
San Juan County, New Mexico**

Dear Mr. Lane:

The ground water discharge plan renewal GW-306 for the Williams Field Services Company Trunk N Compressor Station located in the NW/4 NE/4 of Section 8, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the original application dated May 21, 1998 approved July 9, 1998, the renewal application dated March 19, 2003 and the attached stipulations of approval. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

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

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



Mr. Michael K. Lane  
GW- 306 Trunk N Compressor Station  
April 21, 2003  
Page 2

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Please note that 20 NMAC 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 20 NMAC 3107.C., Williams Field Services Company is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to 20 NMAC 3109.G.4., this plan is for a period of five years. This approval will expire on **July 9, 2008**, and Williams Field Services Company should submit an application in ample time before this date. Note that under 20 NMAC 3106.F. of the regulations, if a discharger submits a discharge 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 renewal.

The discharge plan renewal application for the Williams Field Services Company Trunk N Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a renewal discharge plan application will be assessed a fee equal to the filing fee of \$100 plus a flat fee of \$1,700.00 for compressor station with greater than 1,001 horsepower rating. 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

ATTACHMENT TO THE DISCHARGE PLAN GW-306  
WILLIAMS FIELD SERVICES COMPANY  
TRUNK N COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(April 21, 2003)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. The \$1,700.00 required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Company Commitments: Williams Field Services Company will abide by all commitments submitted in the discharge plan renewal application dated March 19, 2003 and these stipulations for renewal.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans that are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge 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: Williams Field Services Company shall maintain storm water runoff controls. As a result of Williams Field Services Company's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services Company shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Williams Field Services Company shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Trunk N Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk N Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES COMPANY

by \_\_\_\_\_  
Title

ATTACHMENT TO THE DISCHARGE PLAN GW-306  
WILLIAMS FIELD SERVICES  
TRUNK N COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(July 9, 1998)

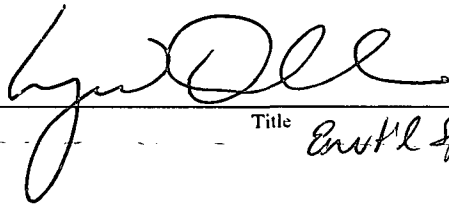
1. Payment of Discharge Plan Renewal Fees: The \$50.00 filing fee has been received. A flat fee of \$1,380.00 is required for discharge plans for compressor stations with greater than 3,000 horsepower. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated May 21, 1998.
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.
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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.
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Accepted:

WILLIAMS FIELD SERVICES

by  Title *Envt'l Specialist*



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

July 9, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-357-869-986**

Ms. Ingrid Deklau  
Williams Field Services  
295 Chipeta Way  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900

**RE: Discharge Plan GW-306  
Trunk N Compressor Station  
San Juan County, New Mexico**

Dear Ms. Deklau:

The ground water discharge plan GW-306 for the Trunk N Compressor Station located in the SW/4 NE/4 of Section 17, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the original discharge plan application dated May 21, 1998 and the conditions 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 10 working days of receipt of this letter.**

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

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



Ms. Ingrid Deklau  
July 9, 1998  
Trunk N Compressor Station  
Page 2

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

Pursuant to Section 3109.H.4., this plan approval is for a period of five years. This approval will expire on July 9, 2003, 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 renewal.

The discharge plan renewal application for the Williams Field Services Trunk N Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$1,380.00 for compressor stations with greater than 3,000 horsepower. The flat fee may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval. The OCD has received the filing fee.

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

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

Sincerely,



Roger C. Anderson  
Chief, Environment Bureau  
Oil Conservation Division

RCA/wjf  
Attachment

xc: OCD Aztec Office

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

7 357 869 966

Sent to	David Deklau
Street & Number	WFS
Post Office, State, & ZIP Code	Salt Lake City
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	GW-306

PS Form 3800 April 1995

ATTACHMENT TO THE DISCHARGE PLAN GW-306  
WILLIAMS FIELD SERVICES  
TRUNK N COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(July 9, 1998)

1. Payment of Discharge Plan Renewal Fees: The \$50.00 filing fee has been received. A flat fee of \$1,380.00 is required for discharge plans for compressor stations with greater than 3,000 horsepower. 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 Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated May 21, 1998.
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.
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16. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by \_\_\_\_\_  
Title

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Revised March 17, 1999  
Submit Original  
Plus 1 Copy  
to Santa Fe  
1 Copy to Appropriate  
District Office

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Compressor Station (Trunk N Compressor Station GW-306)

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, New Mexico 87413

Contact Person: Michael K. Lane

Phone: (505) 632-4625

3. Location: NW/4 NE/4 Section 8 Township 32 North Range 7 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: Michael K. Lane

Title: Environmental Specialist III

Signature: Michael K. Lane

Date: March 19, 2003

**DISCHARGE PLAN RENEWAL**

**TRUNK N COMPRESSOR STATION  
(GW-306)**

Williams Field Services Company

January 2003

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

## List of Appendices

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

**I. TYPE OF OPERATION**

The Trunk N Compressor Station was built in 1998 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.

**II. LEGALLY RESPONSIBLE PARTY**

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

**Contact Person:**

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

**III. LOCATION OF FACILITY**

The Trunk N Compressor Station is located in Section 17, Township 32 North, Range 7 West, in San Juan County, New Mexico, approximately 25 miles northeast of Aztec, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangle: Burnt Mesa, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

**IV. 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

**V. FACILITY DESCRIPTION**

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation of eight 1368 hp engines. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

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

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



**TABLE 1**  
**SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS**  
**TRUNK N COMPRESSOR STATION**

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

**VII. 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. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

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

**TABLE 2**  
**TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS**  
**TRUNK N COMPRESSOR STATION**

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	(8) 500 gallons	Berm	Non-exempt	May be hauled to a WFS 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 WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Produced Water	Above Ground Storage Tank	400 bbl	Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Waste Water	Above Ground Storage Tank	740 gallons	Berm	Non-exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Glycol	Above Ground Storage Tank	500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above Ground Storage Tank	(8) 500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

## **VIII. 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.

### **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.

### **Best Management Practices**

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

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

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

## **IX. INSPECTION, MAINTENANCE AND REPORTING**

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

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

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

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

WFS corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).

## **XI. SITE CHARACTERISTICS**

The Trunk N Compressor Station is located approximately 25 miles northeast of Aztec, New Mexico. The site elevation is approximately 6,500 feet above mean sea level. The natural ground surface topography slopes downward toward the southwest. The maximum relief over the site is approximately 15 feet. Intermittent flow from the site will follow natural drainage to southwest to an unnamed drainage. The drainage drains to the west into Navajo Lake. The Navajo Lake, approximately 1 mile to the west of the site, is nearest down-gradient perennial source of surface water at an elevation of approximately 6,080 feet.

A review of the available hydrologic data<sup>1,2</sup> for this area revealed that there are no water wells within a one-mile radius of the Trunk N Compressor Station. The water-bearing unit in this area is the San Jose Formation. The San Jose Formation is the youngest Tertiary bedrock unit. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 200 to 500 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

The 100-year 24-hour precipitation event at a regional weather station is 2.8 inches. This small amount of rainfall for the area should pose no flood hazards. Vegetation in the area consists predominantly of sagebrush and native grasses

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

### References

<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, 2000.

## **XII. FACILITY CLOSURE PLAN**

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

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

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

**FIGURE 1**

**SITE VICINITY / TOPOGRAPHIC MAP**

**FIGURE 2**

**SITE PLAN**





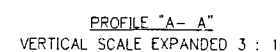
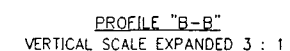
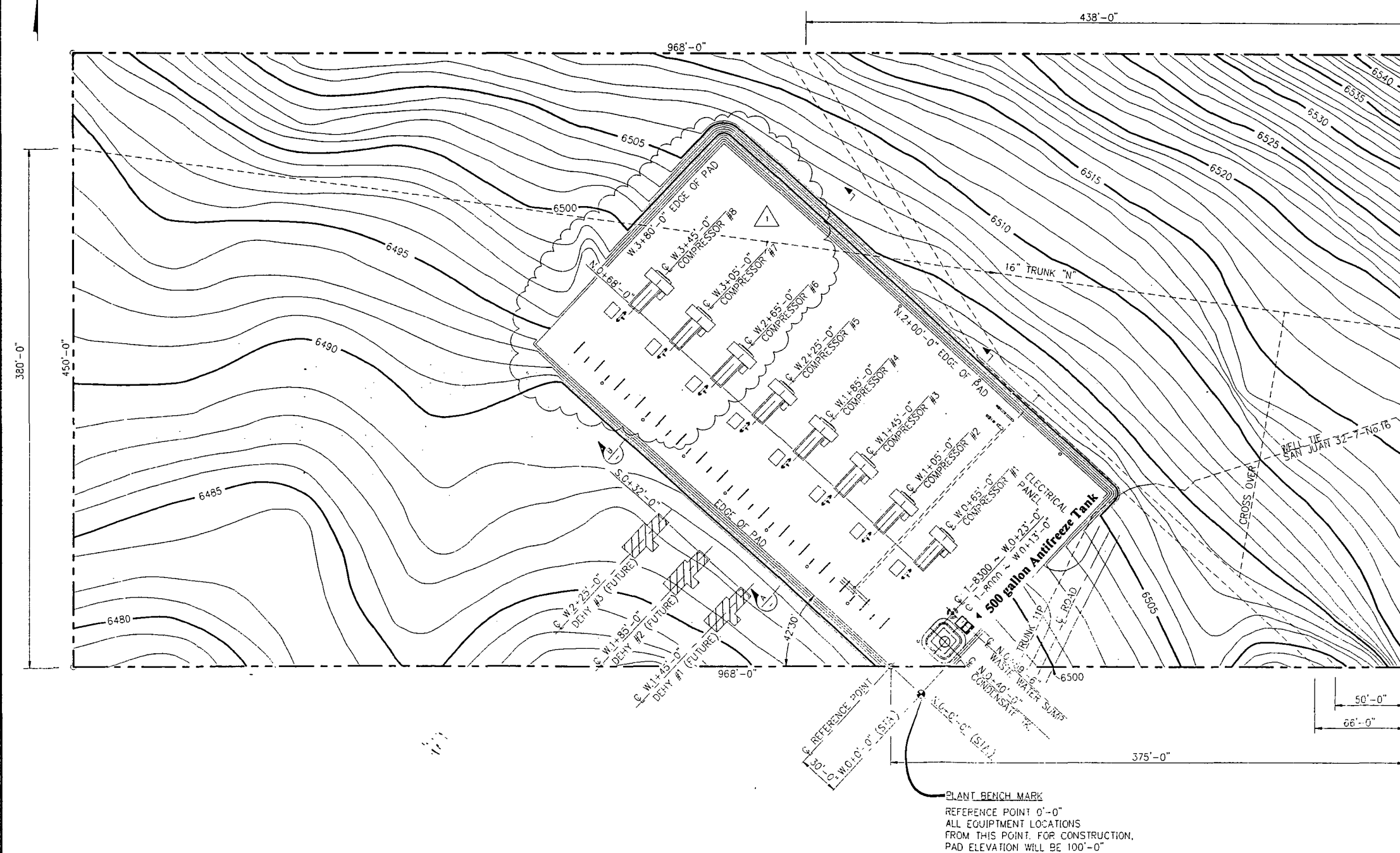
Source: USGS Burnt Mesa, New Mexico Quadrangle

0 2000  
Scale (Feet)



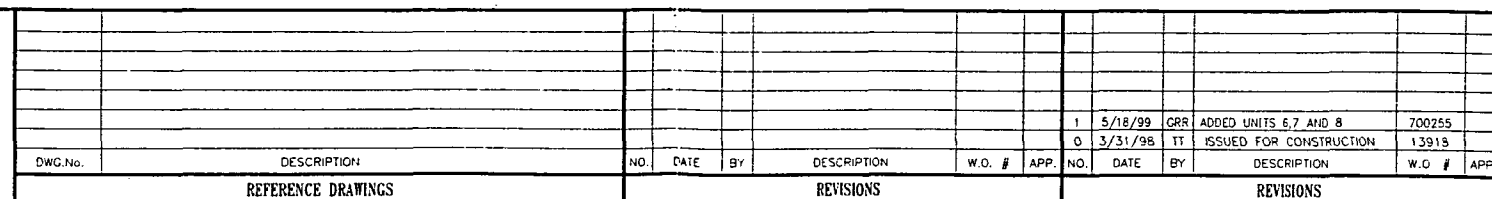
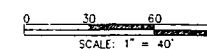
**Figure 1 Site Vicinity / Topographic Map**  
**Trunk N Compressor Station**  
 Section 17, Township 32N Range 7W  
 San Juan County, New Mexico





1. EXCAVATION AREA SHOWN IS AN APPROXIMATE AREA REQUIRED, AND MAY BE ADJUSTED AS REQUIRED BY ACTUAL FIELD CONDITIONS.
2. LOCATIONS OF MISC. EQUIPMENT (I.E. LIGHTING STANDARDS, PULSATION BOTTLE, ETC.) ARE APPROXIMATE. SEE PIPING PLANS FOR ACTUAL LOCATIONS.
3. DRAINAGE AND DIVERSION DAMS ARE TO BE CONSTRUCTED AS REQUIRED AFTER FINAL EXCAVATION AND GRADING IS COMPLETE.

AREA = 435600 Sq.Ft.  
OR 10.00 ACRES



DRAFTING	BY	DATE
DRAWN	TT	2/20/98
CHECKED	JW	3/15/98
APPROVED	-	
ENGINEERING	BY	DATE
C & S REVIEW		
PROJECT APPROVED	-	
PLT DATE/TIME	3/10/1998 9.44 A	

**WILLIAMS ENERGY GROUP**  
ONE OF THE WILLIAMS COMPANIES, INC.

SAN JUAN TRUNK "N"  
COMPRESSOR STATION  
EXCAVATION & SITE LAYOUT


SCALE: 1" = 40'-0"

DWG. NO. TRN-1-M1



**APPENDIX A**

**SPILL CONTROL PROCEDURES**

	<b>Reference (Book Title)</b> Operations/Maintenance Field Services	<b>Task/Document No.</b> 21.10.020
	<b>Section</b> General/Safety	<b>Regulation No./Reference</b>
	<b>Subject</b> Discharges or Spills of Oil or Hazardous Substances; Preventing, Controlling and Reporting of	<b>Effective Date</b> 12/15/99

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*Hit "CTRL-F" to find text on this page.*

## ► Document History (ISO9001)

## ▼ Document Body

### 1.0 PURPOSE AND SCOPE

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

### 2.0 CONTENTS

### 3.0 POLICY

#### 3.1 GENERAL

- 3.1.1 All Company facilities which could discharge or spill, oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to, fish, shellfish, wildlife, shorelines and beaches are subject to the provisions of this document.
- 3.1.2 Oil, for purpose of this document, means oil of any kind or in any form, including but not limited to petroleum hydrocarbon, fuel oil, Y grade, natural gas liquids, condensate, mixed products, sludge, oil refuse and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) is not considered to be oil.
- 3.1.3 Hazardous Substance, for purposes of this procedure, is defined as any chemical or

material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:

- a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act
- c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
- d. Section 112 of the Clean Air Act
- e. Section 7 of the Toxic Substance Control Act

3.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

3.1.5 Facilities which could discharge or spill, oil or hazardous substances into a watercourse must comply with the applicable federal, state or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake or standing body of water capable of collecting or transporting an oil or hazardous substance.

3.1.6 Facilities which are subject to the requirements stated in this policy are as follows:

a. Non-Transportation Related Facilities

(1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.

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

b. Transportation Related Facilities

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

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

3.1.8 The facility superintendent is responsible for spill prevention. His/her duties include,

but are not limited to, the following:

a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.

b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.

c. Briefings should highlight and describe known discharges or spills and recently developed precautionary measures.

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

a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.

b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.

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

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

## 3.2 BULK STORAGE TANKS

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

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

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

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

### **3.3 FACILITY DRAINAGE**

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

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

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

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

a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation or displacement by foreign materials.

b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.

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

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

3.3.5

a. Berms or retaining walls

b. Curbing

c. Culverting, gutters or other drainage systems

d. Weirs, booms or other barriers

e. Spill diversion ponds or retention ponds

f. Sorbent materials

### **3.4 TRANSFER OPERATIONS, PUMPING and IN-PLANT/STATION PROCESS**

3.4.1 Aboveground valves and pipelines should be examined regularly by operating

personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks and metal surfaces.

### **3.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK**

- 3.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.
- 3.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- 3.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets that may allow leakage should be tightened, adjusted or replaced to prevent liquid leakage while in transit.

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

### **4.0 PROCEDURE**

- 4.1 **Identifying, Containing and Initial Reporting of a Discharge or Spill of Oil or Hazardous Substance**  
Any Employee
  - 4.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity shall immediately contain the release (if safe to do so) and notify the facility superintendent, dispatcher or other designee. Releases must be reported to gas control in the following three circumstances:
    - I. The Following Situations Always Require IMMEDIATE Reporting to Gas Control:
      - 1. Release reaches or may reach surface water: (pond, lake, wash or ground water)
      - 2. Release leaves Williams property
      - 3. Release is of questionable nature (i.e., unknown product, unknown hazards)
    - II. Onsite Releases of Certain Common Industrial Materials Above 10 Gallon Threshold Are Reportable.  
Releases that do not migrate off-site or reach surface water may require reporting as well. All releases of 10 gallons or greater of the following materials should be contained and promptly reported to Gas Control:
      - Ammonia
      - Antifreeze
      - Amine

- Chromate Mixtures
- Condensate
- Glycol
- Lube Oil
- Methanol
- Sulfuric Acid
- Sodium Hydroxide
- Natural Gas Liquids
- Other Hydrocarbon Products
- Natural Gas (1 MMSCF)

### III. Releases of Certain Other Materials Reportable:

Releases of the following materials above the indicated amount should be reported to gas control:

- PCB's (Concentration > 50 ppm) - any amount
- Mercaptan (Ethyl Mercaptan) - 1 lb.
- Mercury - 1 lb.
- Hydrogen Sulfide - 100 lbs.
- Pesticides - 1 lb.
- Other Material Not Listed - 1 lb.

**NOTE 1:** A release includes material released (intentionally or unintentionally) to air, water or soil. When notifying Gas Control of a Release, be prepared to provide information on the type of material spilled, amount released, weather conditions, time and date of release, person discovering release and measures taken to control the release.

**NOTE 2:** Refer to Attachment A for containment procedures.  
**Facility Superintendent, Controller or Designee**

#### 4.1.2 Contacts Gas Control immediately by telephone and provides the following information:

- a. Name of company facility and/or location of facility and nature of discharge or spill
- b. Description and quantity of emission or substance discharged
- c. Description of the circumstances causing the discharge or spill
- d. Name, title and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
- e. Action taken or being taken to mitigate and correct discharge or spill
- f. Water bodies or streams involved
- g. Time and duration of discharge or spill

h. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)  
**Gas Control Personnel**

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

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

- 4.1.4 If Environmental Affairs cannot be contacted, notifies Director over Environmental Affairs.

**Facility Superintendent**

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

- 4.1.6 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed. If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).

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

**Environmental Affairs**

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

- 4.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.

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

**4.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL**  
**Facility Superintendent or Designee**

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

- a. Time and date of discharge or spill
- b. Facility name and location
- c. Type of material spilled
- d. Quantity of material spilled



e. Area affected

f. Cause of spill

g. Special circumstances

h. Corrective measures taken

i. Description of repairs made

j. Preventative measures taken to prevent recurrence.

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

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

**ATTACHMENT A**  
**DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS**

TYPE OF FACILITY WHERE THE DISCHARGE OR SPILL OCCURS	CONTAINMENT PROCEDURES	MATERIALS USED FOR CONTAINMENT
A. Oil Pipeline (as defined in C.1.4)	<p>1. Closes appropriate block valves.</p> <p>2. Contains Discharge or spill by: Ditching covering, applying sorbents, constructing an earthen dam or burning.</p> <p>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</p>	<p>1.Straw</p> <p>2.Loose Earth</p> <p>3.Oil Sorbent 3M Brand</p> <p>4.Plain Wood chips</p> <p>5.Sorb-Oil Chips Banta Co.</p> <p>6.Sorb-Oil Swabs Banta Co.</p> <p>7.Sorb-Oil Mats Banta Co.</p> <p>8.Or Equivalent Materials</p>
B. Vehicle	<p>1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, apply sorbents or burning.</p> <p>2. Notifies immediately Environmental Affairs and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials.</p>	

	<p>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</p> <p><b>Note:</b> Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.</p>
C. Bulk Storage Tanks or any other Facilities	<p>1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam or burning.</p> <p>2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</p>

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**APPENDIX B**

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

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 March 17, 1999

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 <input type="checkbox"/>
Address	Telephone No. <input type="checkbox"/>
Facility Name	Facility Type <input type="checkbox"/>

Surface Owner	Mineral Owner	Lease No. <input type="checkbox"/>
---------------	---------------	------------------------------------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County <input type="checkbox"/>
-------------	---------	----------	-------	---------------	------------------	---------------	----------------	---------------------------------

NATURE OF RELEASE

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

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

\* Attach Additional Sheets If Necessary

**APPENDIX C**  
**PUBLIC NOTICE**



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

February 5, 2003

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**70022410000008047216**

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 Trunk N Compressor Station (GW-306). 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 February 2003.

The facility, located in Section 8, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporally stored in tanks or containers with secondary containment. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected because the estimated ground water depth at the site is 200-500 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

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

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

Respectfully submitted,

Clara M. Garcia  
Environmental Compliance

COPY