

GENERAL CORRESPONDENCE

YEAR(S): 2006 – (445

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

November 7, 2007

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

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

Dear Mr. Lowe,

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

More specifically, the updates to Table 1 include replacing language that stated waste would be disposed at a "NMOCD-approved" or simply "approved" disposal facility with text that states waste will be disposed at "any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste." Recently, Williams has had some difficulty using NMED-approved disposal sites due to the current language.

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

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



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

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

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

Respectfully submitted,

ruid Bay-

David Bays Senior Environmental Specialist

Attachment

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	500 gal*	Berm or concrete pad and wastewater system	Non- exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Produced Water/Natural Gas Condensate	Above Ground Storage Tank	300 bbl 120 bbl 40 bbl	Berms	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at 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, vaulted	70 bbl 45 bbl	Dual-walled tanks	Non- exempt	Contractor may pump wash water back into truck after washing; water may be transported to 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		Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	500 gal* 125 gal* 100 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	500 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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

Rosa #1 CDP Discharge Plan - Table 1

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

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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

2005 AUG 23 AM 11 44



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

August 22, 2006

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

Re: Change of Company Name

Dear Mr. Price;

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

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

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

Sincerely,

il Bays-

David Bays Senior Environmental Specialist

Attachments

xc: Clara Cardoza Monica Sandoval WFS FCA file 210 ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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I hereby acknowledge receipt of check No and international or cash received on _____ in the amount of \$ $\frac{1}{100,00}$ from Williams Field Services for <u>Honoluly C.S.</u> 6w-315 - Date: 1-12-06 Submitted to ASD by: ____Data: Filing Fee ____ New Facility ____ Renewal V Modification ____ Other __ Organization Code <u>521.07</u> Applicable FY <u>2001</u> To be deposited in the Water Quality Management Fund. Full Payment / or Annual Increment ____ E AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. IT ALSO HAS A REFLECTIVE WATERMARK ON THE BAC MERIK PAY TO THE ORDER OF NEW MEXICO OIL CONSERVATION DIV 1220 S ST FRANCIS DR muhanghe SANTA FE NM 87505 UNITED STATES SUPPLIER NUMBER



29-DEC-2005

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12/30/2005 403816

INVOICE NUMBER

WILLIAMS FIELD ERVICES COMPANY PO Box 21218 Tulsa, OK 74121-1218 Customer Support 1-866-778-2665





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

January 4, 2006

Mr. Jack Ford New Mexico Oil Conservation Division Water Quality Management Fund 1220 S St. Francis Dr. Santa Fe NM 87505

Re: Discharge Permit Renewal GW-315 Honolulu Compressor Station

Dear Mr. Ford:

Enclosed please find copies of Discharge Permit Renewal and check number 4027010468 for \$1,700.00 flat fee for the Williams Field Services (WFS) Honolulu Compressor Station.

Williams Field Services appreciates your assistance in handling this renewal and fees. If you have any questions or require additional information, please contact me at 505/632/4625.

Thank you,

Samac 100

Monica Sandoval Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

AFFIDAVIT OF PUBLICATION

Ad No. 52276

STATE OF NEW MEXICO County of San Juan:

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

Wednesday, September 21, 2005.

And the cost of the publication is \$65.36.

ON 9/28/05 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Commission Expires November 17 200

COPY OF PUBLICATION

918 Legals

NOTICE OF PUBLICATION

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

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

(GW-315) - Williams Field Services, David Bays, (505) 634-4951, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for the Williams Field Services Honolulu Compressor Station located in the NW/4 of Section 12, Township 26 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 10 gallons per day of produced and washdown water is stored in a below grade closed top fiberglass tank within a concrete vault prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oiffield 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. Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 385 feet with estimated total dissolved solids concentration ranging from approximately 5000mg/1 to 2,000 mg/l.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of July 2005.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

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MARK FEISMIER, P.E., Director

Legal No. 52276 published in The Daily Times, Farmington, New Mexico on Wednesday, September 21, 2005.

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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NEW MEXICO ENERGY, MERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary

July 12, 2004

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

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

RE: Discharge Plan Renewal Notice for Williams Field Services Facilities

Dear Mr. Lane:

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

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

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

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

Mr. Michael Lane July 12, 2004 Page 2

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

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

Sincerely,

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

cc: OCD Aztec District Office

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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

August 17, 1999

Ms. Lori Wrotenbery New Mexico Oil Conservation Division 2040 South Pacheco______ Santa Fe, New Mexico 87505

Re: Discharge Plan Application and Filing Fee for WFS Honolulu Compressor Station, Rio Arriba County

Dear Ms. Wrotenbery:

Enclosed please find check number 2148522 for \$50.00 to cover the discharge plan filing fee for Williams Field Services (WFS) Honolulu Compressor Station to be located in Rio Arriba County, New Mexico. The Honolulu Discharge Plan application was forwarded under separate cover in July.

Williams Field Services appreciates your assistance in handling this application. If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Ingrid Deklau Environmental Specialist

Enclosures

Affidavit of Publication

State of New Mexico County of Río Arriba

I, Robert Trapp, being first duly sworn, declare and say I am the Publisher of the Río Grande SUN, a weekly newspaper published in the English language and having a general circulation in the City of Española, County of Río Arriba, State of New Mexico, and being a newspaper duly gualified to publish legal notices and advertisements under the provisions of Chapter 167 of the Session Laws of 1937; the publication, a copy of which is hereto attached, was published in said paper once each week for

consecutive weeks and on the same day of each week in the regular issue of the paper during the time of publication and the notice was published in the newspaper proper, and not in any

supplement, the first publication being on the day of

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Publisher's Bill

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Affidavit

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Payment received at Río Grande SUN

; payment for said advertisement has been duly made, 19 or assessed as court costs; the undersigned has personal knowledge of the matters and things set forth in this affidavit.

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Publisher

Subscribed and sworn to before me this day of

A.D., 19

Date

Notary Public My commission expires 17 May 2001

By .

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

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

(GW-315) - Williams Field Services, Ingrid A. Deklau, (801) 584-6543, P.O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for the Williams Field Services Honolulu Compressor Station located in the NM4 of Section 12, Township 26 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 10 gallons per day of produced and washdown water is stored in a below

grade, closed top ...oerglass tank within a concrete vault prior to transport to an OCD approved off-site disposal facility. Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 385 feet with estimated total dissolved solids concentration ranging from approximately 500mg/1 to 2,000 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of August, 1999.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION LORI WROTENBERRY, Director

(Published August 19, 1999.)

(SEAL)

The Santa Fe New Mexican

Since 1849. We Read You.

NM OCD



AD NUMBER: 102021 ACCOUNT: 56689 LEGAL NO: 65885 P.O.#: 00199000278 177 LINES 1 time(s) at \$ 77.93 AFFIDAVITS: 5.25 TAX: 5.20 TOTAL: 88.38

AFFIDAVIT OF PUBLICATION

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RE-SOURCES DEPARTMENT OIL CONSERVATION DIVISION

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Any interested person may.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of August 1999.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

Legal #65885 Pub. August 12, 1999

202 East Marcy Street CP

STATE OF NEW MEXICO COUNTY OF SANTA FE

Kunle being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #65885 a copy of which is hereto attached was published in said newspaper 1 day(s) between 08/12/1999 and 08/12/1999 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 12 day of August, 1999 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/

LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 13-day of August A.D., 1999...

Notary

Commission Expires

11 a3/99



New Mexico 87501



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

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

(GW-315) - Williams Field Services, Ingrid A. Deklau, (801) 584-6543, P. O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for the Williams Field Services Honolulu Compressor Station located in the NW/4 of Section 12, Township 26 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 10 gallons per day of produced and washdown water is stored in a below grade closed top fiberglass tank within a concrete vault prior to transport to an OCD approved off-site disposal facility. Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 385 feet with estimated total dissolved solids concentration ranging from approximately 500mg/l to 2,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of August 1999.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

SEAL

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

GAL

July 29, 1999

Ms. Lori Wrotenbery New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Discharge Plan Application Filing Fee for WFS Honolulu Compressor Station, Rio Arriba County

Dear Ms. Wrotenbery:

On July 22, 1999, I submitted the Discharge Plan application for the Williams Field Services (WFS) Honolulu Compressor Station. In my cover letter addressed to you, I mentioned that the \$50.00 filing fee would follow at a later date. Our Accounting Department has informed me that on July 23, 1999 check number 2148522 for \$50.00 was forwarded directly to the OCD, with no cover letter attached. Please be advised that this check is intended to cover the filing fee for the WFS Honolulu Compressor Station.

Williams Field Services appreciates your assistance in handling this matter. If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Ingrid Deklau Environmental Specialist





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

622

July 22, 1999

Ms. Lori Wrotenbery New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Discharge Plan Application for WFS Honolulu Compressor Station, Rio Arriba County

Dear Ms. Wrotenbery:

Enclosed please one copy of the Williams Field Services (WFS) Honolulu Discharge Plan application. The site is to be located in Rio Arriba County, New Mexico. The \$50.00 filing fee will follow at a later date as we are currently experiencing problems with our accounting system.

Williams Field Services appreciates your assistance in handling this application. If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Ingrid Deklau Environmental Specialist

Enclosures

Xc: Denny Foust, Aztec OCD



DISCHARGE PLAN

TORRE ALTA GATHERING SYSTEM HONOLULU COMPRESSOR STATION

G D . li

Williams Field Services Company

July, 1999

State of New Mexico Energy, Minerals and Natural Resources Department OIL CONSERVATION DIVISION P.O. Box 2088 Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS, OIL REFINERIES AND GAS COMPRESSOR STATIONS

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

I.	TYPE: Natural Gas Compressor Station
II.	OPERATOR: Williams Gas Processing - Blanco
	ADDRESS: 295 Chipeta Way Salt Lake City, UT 84108
	CONTACT PERSON: Inerial Deklau PHONE: 801-584-6543
III.	LOCATION: <u>/4 NW</u> /4 Section <u>12</u> Township <u>26N</u> Range <u>51</u> Submit large scale topographic map showing exact location.
IV.	Attach the name and address of the landowner(s) of the disposal facility site.
V.	Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
VI.	Attach a description of sources, quantities and quality of effluent and waste solids.
VII.	Attach a description of current liquid and solid waste transfer and storage procedures.
VIII.	Attach a description of current liquid and solid waste disposal procedures.
IX.	Attach a routine inspection and maintenance plan to ensure permit compliance.
X.	Attach a contingency plan for reporting and clean-up of spills or releases.
XI.	Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
XII.	Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
XIII.	CERTIFICATION
	I hereby certify that the information submitted with this application is true and
	correct to the best of my knowledge and belief.
	Name: Ingrid Dekla Title: Envi'l Specialist
	Signature:

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

5/92

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Appendix A - Waste Analysis Appendix B - Spill Control Procedures Appendix C - NMOCD Notification of Fire, Breaks, Spills, Leaks, and Blowouts

I. **TYPE OF OPERATION**

The Honolulu Compressor Station will provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Lybrook Plant.

П. LEGALLY RESPONSIBLE PARTY

Williams Gas Processing - Blanco 295 Chipeta Way Salt Lake City, Utah 84108 (801) 584-6543

Contact Person: Ingrid Deklau, Environmental Specialist Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Honolulu Compressor Station will be located in the NW/4 of Section 12, Township 26 North, Range 5 West, in Rio Arriba County, New Mexico, approximately 25 miles northwest of Cuba, New Mexico. The site is on Jicarilla Tribal land, and the Tribe is authorizing the use of the land. A Site Location map is attached (USGS 7.5 Min. Quadrangles: Lapis Point, New Mexico and Vigas Canyon, New Mexico) as Figure 1. The site for this station is 0.46 acres. The site boundary survey and facility layout are illustrated in Figure 2 and Figure 3. All Figures are attached following Section XI of the text.

IV. LANDOWNER

Williams Field Services is leasing the subject property from:

Bureau of Indian Affairs, Jicarilla Apache Indian Agency **PO Box 167** Dulce, New Mexico 87528 Phone: 505-759-3976

V. FACILITY DESCRIPTION

HP) Construction of the facility and installation of one Waukesha 7042 G engine (site rated at 775 HP) is anticipated to be completed in August, 1999. The unit will be skid-mounted and self contained. This facility is classified as a field compressor station; consequently, the facility will be unmanned and there will be no formal office or other support facilities not essential to field compression at the site.

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. Material Safety Data Sheets for oil used in the equipment were previously provided to New Mexico Oil Conservation Division (NMOCD) by WFS. For reference, representative samples of washdown wastewater and used motor oil have previously been collected from representative WFS compressor stations and analyzed for the parameters listed below.

Sample	Parameters
Washdown Wastewater	pH, TDS, TOX, TPH, BETX, As, Ba, Cd, Cr, Pb, Hg, Se, Ag.
Used Motor Oil	As, Cd, Cr, Pb, TOX, Flash Point

The results of previous tests conducted on similar waste streams showed that the washdown water did not exhibit any of the hazardous characteristics and used motor oil was suitable for recycling (see Appendix A). Additional Chemicals listed in WQCC 1101.TT and 3103 are not expected to be present in any process fluids or in the gas transported at this compressor station.

Used oil filters have been collected from representative WFS compressor stations and analyzed for TCLP Metals. The results of the analysis found that the filters did not exceed TCLP concentrations for metals. The analyses were submitted to the San Juan County Regional Landfill along with the Waste Acceptance Profiles. These profiles are updated every two years or as required by the landfill.

TABLE 1 SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS HONOLULU COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	QUANTITY (estimate)	QUALITY
Used Oil	Compressor	500 gal/yr/engine	Used motor oil w/no additives
Natural Gas Condensate	Scrubber, Gas Inlet Separator	1000 bbl/yr	No additives
Waste Water	Drawn of Natural Gas Condensate Tank	200 bbl/yr	No additives
Wash-down Water	Compressor Skid	700 gal/yr/engine	Soap and tap water w/traces of used oil
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives
Used Oil Filters	Compressor	28/yr/engine	No additives

VII. <u>TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND</u> WASTE SOLIDS

Table 2 describes the transfer, storage and disposal of process fluids, effluents, and waste solids expected to be generated at the site. The table also includes information regarding the type of container in which the waste stream will be stored, container capacity, and containment/spill prevention provisions.

Exempt and non-exempt wastes will be managed separately. Only exempt wastes will be disposed down Class II injection wells. Non-exempt wastes will be characterized for hazardous constituents.

TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS HONOLULU COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Natural Gas Condensate	Scrubber, gas inlet separator	Above Ground Storage Tank	210 bbl	Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Waste Water	Drawn off condensate tank	Below grade tank, vaulted	70 bbl	Double-bottomed tank	Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Wash-down Water	Compressor skid	Below-ground sump, vaulted	Anticipate 650 gal tank	Metal water trough set on concrete pad, or double bottom tank	Non-exempt	Contractor may pump washwater back into truck after washing; water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Used Oil Filters	Compressor	Drum or other container	up to 100 gallons	Transported to POI or WFS facility in drum or other container	Non-exempt	Taken to POI or WFS consolidation point, drained, and ultimately transported for disposal at a Regional Landfill. A Waste Acceptance Profile will be filed with the landfill. Recycling options may be considered when available.
Used Absorbents	Incidental spills or leaks	Drum or other container	up to 100 gallons	Transported to WFS or POI facility in drum or other container	Non-exempt	Taken to WFS or POI consolidation point, drained, and ultimately transported for disposal at a Regional Landfill. A Waste Acceptance Profile will be filed at the landfill. Recycling options may be considered when available.
Spill Residue (i.e., soil, gravel)	Incidental spills	N/A	Ν/Α	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.
Ambitrol/ Antifreeze	For use in compressor	Drum	55 gallons	Berm	N/A	N/A
Compressor Oil	For use in compressor	Day tank adjacent to each engine	500 gallons	Berm	N/A	N/A
Used Oil	Compressor	Removed from site when generated	Varies, portable used oil tank	N/a	Non-exempt	Hauled to WFS or POI consolidation point and then transported to EPA-registered used oil marketer for recycling.

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VIII. INSPECTION, MAINTENANCE AND REPORTING

Production Operators, Incorporated (POI) will be contracted to operate and maintain the facility. The facility will be inspected several times per week at a minimum and a POI operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The above ground and below ground tanks will be gauged regularly, and monitored for leak detection. The facility will be inspected monthly. All inspections will be recorded on the facilities operating record. The facility will be remotely monitored for equipment malfunctions through Gas Dispatch and the WFS Jicarilla District, Ojito Compressor Station. POI must comply with Williams' spill response procedures.

Environmental Protection will be a contractual obligation as follows:

<u>Pollution/Hazardous Waste</u>: POI shall take all necessary precautions to control pollution of any kind resulting form POI's operation of the compression equipment. At POI's sole cost, all hazardous substances, hazardous wastes and oil will be managed to prevent contamination of property and associated surface and groundwater resources.

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

In the event of a release of a reportable quantity, the operator reports the release to WFS Gas Control who immediately notifies the WFS Environmental Affairs Department. WFS Environmental Affairs then reports the release to the appropriate agencies.

IX. 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 ground 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 (see Figure 4).

Prior to facility start-up, all pressure vessels on site will be tested in accordance with the requirement of the ASME Boiler and Pressure Vessel Code. All interconnecting gas piping on site will be tested in accordance with the requirements of the ASME Code for Pressure Piping, B31.8 Gas Transmission and Distribution Piping Systems.

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

X. SITE CHARACTERISTICS

The Honolulu Compressor Station is located on BS Mesa at an elevation of approximately 7300 feet. The surrounding area is characterized by high mesas exceeding 7,000 feet in elevation, and is dissected by numerous small canyons and broad valleys. Vegetation in the area consists predominantly of sagebrush and native grasses

The natural ground surface topography of the Honolulu site slopes downward toward the southeast. The maximum relief over the site is approximately 4 feet. The site is several hundred feet northeast of an intermittent stream that flows northwest into the Cereza Canyon drainage, which is located about 4 miles downgradient at an elevation of approximately 6500 feet.

A review of the available hydrologic data^{1,2} for this area revealed that there is only one water well within a radius of two miles from the location of the Honolulu Compressor Station. The nearest water well was found within one mile of the site in the southeast quarter of Township 26 North, Range 5 West, Section 2. The data available on this well indicated that the well was drilled to a depth of 500 feet, in the San Jose formation, for Lindberg Velarde. The well is located at 6750 feet above mean sea level and in 1977 the depth to water was measured to be 385 feet. The producing intervals are indicated to be 304-355 feet and 420-500 feet.

The 100-year 24-hour precipitation event for the area is 2.8 inches. This small amount of rainfall for the area should pose no flood hazards.

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

References

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.

²Records of Water Wells in San Juan County, 1978-1983.

XI FACILITY CLOSURE PLAN

All reasonable and necessary measures will be taken to prevent the exceedence of WCQQ Section 3103 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.







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FIGURE 3

NDTES:

1. ALL UNBERGROUND PIPING INSTALLED SHALL BE HAND CLEANED, PRIMED AND TAPED WITH POLYKEN PRODUCT PER THE SPECIFICATION IN THE CONTRACT DOCUMENTS.

- 2. ALL DIMENSIONS, ELEVATIONS AND DEPTHS TO BE FIELD VERIFIED.
- 3. ALL UNDERGROUND PIPING TO HAVE A MINIMUM OF 36' COVER
- 4. ALL PIPE COATING TO BE EXTENDED TO 6" ABOVE GRADE.
- 5. SLEEPERS' SHALL BE INSTALLED UNDER EACH LINE UNDER RISERS.

6. ALL EXPOSED PIPING AND STEEL STRUCTURES SHALL BE PRIMED AND TWO COAT PAINTED PER THE CONTRACT SPECIFICATIONS.

7. ALL 3" AND LARGER PIPE SHALL BE 100% X-RAYED.

8. CONTRACTOR'S WORK SHALL COMPLY WITH DOT 192, ASME B31.8 AND API 1104

9. THE COMPRESSOR PAD CHAIN LINK FENCE VILL BE INSTALLED BY DTHERS. THE CONTRACTOR VILL PROVIDE MATERIALS FOR AND INSTALLATION OF THE HOG VIRE FENCE SURROUNDING THE CONDENSATE TANK SYSTEM.

10. RELIEF VALVE PIPING TO EXTEND ABOVE COOLER WITH ADEQUATE BRACING.

11. CONTRACTOR SHALL PROVIDE MATERIALS FOR AND INSTALL FOUR PIPE SUPPORTS TO BE LOCATED BY COMPANY REP. DENDTES SLEEPER LOCATIONS

			FI	61	l	RE3	s - Plot Plan	
	DESIGN BATA	·		HYDROTES	T REQUI	REMENTS	HINIHUM X-RAY REQUIR	ENENTS
		SUCTION PIPING				· · · · · · · · · · · · · · · · · · ·		
	CLASS: 1 FACTOR: 0.5 MADP: 285 F	P\$1G	400 P 4 HR	SIG MIN 500 PSIG MAX.		O PSIG MAX.	100% - 3° AND ABOVE	
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	DRAFTING	BY	DATE				WILLIAMS FIELD SERVICE	ST/
	DRAVN	RJB	5/24/99					
	CHECKED	RJP			i	TORRE AL	TA GATHERING SYSTEM	
_	APPROVED					SEC. 12.	T-26-N. R-5-V NMPM	
_	ENGINEERING	BY	DATE	RID ARRIBA COUNTY, NEW MEXICO				
PP.	PROJ. APPROVED			SCALE: 1	*=20'	DING NO		REV.
				V.D. ND.	XXX	DWG NO.	HUN-1-P1	1
					1			



FIGURE 4 (1062) BELOW GRADE SUMP Note: Below grade sump (washdown water) is anticipated to be constructed as specified on this drawing, or as specified on Figure 4 (2g2) WILLIAMS FIELD SERVICES STATE: NEVI MEXICO COUNTY: RUE ARREN ONE OF THE WILLIAKS COMPANIES HONOLULU COMPRESSOR STATION SUMP TANK PLAN AND SECTION Sheet 2a REV DWG NO. HDN-8M-101 QF




APPENDIX A

WASTE ANALYSIS

Enseco Incorporated CEDAR HILL C.D.P. WASTE CIL + WASTEWATE

Enseco A Corning Company

ANALYTICAL RESULTS

FOR

NORTHWEST PIPELINE CORPORATION

ENSECO-RMAL NO. 024601

SEPTEMBER 21, 1992

Rocky Mountain Analytical Laboratory

A CORNING Company

ANALYTICAL RESULTS FOR NORTHWEST PIPELINE CORPORATION ENSECO-RMAL NO. 024601

SEPTEMBER 21, 1992

U 1A Reviewed by: Ű Joe A. Maes Joel E. Holtz

Enseco Incorporated 4955 Yarrow Street Arvada, Colorado 80002 303/421-6611 Fax: 303/431-7171



ORGANIC ANALYSIS REPORT

AMERICAN Date Sampled: July 19,1995 WEST Date Received: July 20,1995

ANALYTICAL Analysis Requested: LABORATORIES Volatile Aromatics

Total Purgeable Hydrocarbons

Field Sample ID: SAN JUAN AREA CEDAR HILL #1

463 West 3600 South Analytical Results

Contact: Mark Harvey Date Analyzed: July 26,1995

Method Ref.Number: SW-846 #8260 (Purge & Trap GC/MS)

Lab Sample ID: L23218-8

BTX/TPH-P

Salt Lake City, Utah	Units = mg/L(ppm)		
84115		Detection	Amount
	Compound:	Limit:	Detected:
	Benzene	0.020	0.036
(801) 263-8686 Fax (801) 263-8687	Toluene	Detection Amount Limit: Detected: 0.020 0.036 0.020 0.046 0.020 0.14 0.020 0.14 0.020 0.195 sydrocarbons 0.20 19.	
	Ethylbenzene	0.020	0:14
	Total Xylene	0.020	0.95
	Total Purgeable Hydrocarbons	0.20	19.

< Value = None detected above the specified detection limit, or a value that reflects a reasonable limit due to interferences.

Released By: ______

Report Date: July 31,1995

1 of 1

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INORGANIC ANALYSIS REPORT

AMERICAN WEST ANALYTICAL LABORATORIES Client Williams Field Service Date Sampled: July 19, 1995 Lab Sample ID.: 23218-08 Field Sample ID: San Juan Area/Cedar Hill #1 Contact: Mark Harvey Date Received: July 20, 1995 Received By: Laurie Hastings Set Description: One Water and Seven Soil Samples

	Analytical Results			
463 West 3600 South	TOTAL METALS	Method Used:	Detection Limit: mg/L	Amount Detected: mg/L
84115	Arsenic	7060	0.005	<0.005
	Barium	6010	0.002	2.8
(801) 263-8686	Cadmium	6010	0.004	0:013
Fax (801) 263-8687	Chromium	60 10	0.01	0.03
	Lead	6010	0.05	0.13
	Mercury	7471	0.001	<0.001
	Selenium	7740	0.005	<0.005
	Silver	6010	0.01	<0.01
	OTHER CHEMISTRIES			
	pH	1 50. 1	0.1	6.8
	TDS	160.1	1.0	3,600.
	TOX	9020	0.5	1.6

Released by:

Laboratory Supervisor

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P. 2

THIS EXPORT IS PROVIDED FOR THE EXCLUSIVE USE OF THE ADDRESSER, PRIVILECES OF SUBSEQUENT, USE OF THE HAME OF THE COMPANY OR ANY MEMBER OF ITS STAFF, OR REPRODUCTION OF THIS HEPORT IN CONDECTION WITH THE ADVERTISEMENT, PROMOTION OR SALE OF ANY PRODUCT OR

Introduction

This report presents the analytical results as well as supporting information to aid in the evaluation and interpretation of the data and is arranged in the following order:

- o Sample Description Information
- o Analytical Test Requests
- o Analytical Results
- o Quality Control Report

All analyses at Enseco are performed so that the maximum concentration of sample consistent with the method is analyzed. Dilutions are at times required to avoid saturation of the detector, to achieve linearity for a specific target compound, or to reduce matrix interferences. In this event, reporting limits are adjusted proportionately. Surrogate compounds may not be measurable in samples which have been diluted.

Sample 024601-0001 was diluted for Method 8020 due to concentrations of target compounds present beyond linear range; the reporting limits have been increased accordingly.

Sample 024601-0002 was diluted for Method 9020 due to matrix interferences; the reporting limits have been increased accordingly.

Sample Description Information

The Sample Description Information lists all of the samples received in this project together with the internal laboratory identification number assigned for each sample. Each project received at Enseco-RMAL is assigned a unique six digit number. Samples within the project are numbered sequentially. The laboratory identification number is a combination of the six digit project code and the sample sequence number.

Also given in the Sample Description Information is the Sample Type (matrix), Date of Sampling (if known) and Date of Receipt at the laboratory.

Analytical Test Requests

The Analytical Test Requests lists the analyses that were performed on each sample. The Custom Test column indicates where tests have been modified to conform to the specific requirements of this project.

nseco

pany

SAMPLE DESCRIPTION INFORMATION for Northwest Pipeline Corporation

- · · ·---

Lab ID	Client ID	Matrix	Sampi Date	≥d Time	Received Date
024601-0001-SA 024601-0002-SA 024601-0003-TB	CEDAR HILL CDP WASTE WATER TAN WASTE OIL TANK CEDAR HILL TRIP BLANK	AQUEOUS AQUEOUS AQUEOUS	18 AUG 92 18 AUG 92	12:40 11:30	19 AUG 92 19 AUG 92 19 AUG 92

ANALYTICAL TEST REQUESTS for Northwest Pipeline Corporation

Lab ID: 024601	Group Code	Analysis Description	Custom Test?
0001	A	pH Total Dissolved Solids (TDS) ICP Metals (Total) Prep - Total Metals, ICP Total Organic Halogen (TOX) Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX) Arsenic, Furnace AA (Total) Prep - Total Metals, Furnace AA	
		Lead, Furnace AA (Total) Mercury, Cold Vapor AA (Total) Prep - Mercury, Cold Vapor AA (Total)	N N N
0002	В	Arsenic, Furnace AA Prep - Total Metals, Furnace AA ICP Suite Prep - Total Metals, ICP Lead, Furnace AA Total Organic Halogen (TOX) Ignitability, Closed Cup	N N Y N N N
0 00 3	С	Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)	N

Analytical Results

The analytical results for this project are presented in the following data tables. Each data table includes sample identification information, and when available and appropriate, dates sampled, received, authorized, prepared and analyzed. The authorization data is the date when the project was defined by the client such that laboratory work could begin.

Data sheets contain a listing of the parameters measured in each test, the analytical results and the Enseco reporting limit. Reporting limits are adjusted to reflect dilution of the sample, when appropriate. Solid and waste samples are reported on an "as received" basis, i.e. no correction is made for moisture content.

The results from the Standard Enseco QA/QC Program, which generates data which are independent of matrix effects, are provided subsequently.



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Surrogate a,a,a-Trifluorotoluene

ND = Not detected NA = Not applicable

Reported By: Steve Shurgot

Approved By: Stan Dunlavy

Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)

Method 8020

Client Name: Client ID:	Northwest Pipeline TRIP BLANK	Corporatio	on			
Matrix: Authorized:	AQUEOUS 19 AUG 92	Sampled: Prepared:	Unknown NA		Received: 19 Analyzed: 24	AUG 92 AUG 92
Parameter		1	Result	Units	Reporting Limit	
Benzene Toluene Ethylbenzene Xylenes (tota	al)		ND ND ND ND	ug/L ug/L ug/L ug/L	0.50 0.50 0.50 0.50	
Surrogate		I	Recovery			
a,a,a-Triflu	orotoluene		106	%		

ND = Not detected NA = Not applicable

Reported By: Steve Shurgot

Approved By: Stan Dunlavy

F. Enseco A Corning Company

Metals

Total Metals

Client Name: Client ID: Lab ID: Matrix: Authorized:	Northwest Pipeline CEDAR HILL CDP WAS 024601-0001-SA AQUEOUS 19 AUG 92	2 Corporatio STE WATER T/ Sampled: Prepared:	on ANK 18 AUG 92 See Below	2 Received: Analyzed:	19 AUG See Be	92 1 ow		
Parameter	Result	Ro Units	eporting Limit	Analytical Method	Prepare Date	d Ar	ialyze Date	d
Arsenic Barium Cadmium Chromium Lead Mercury	ND 0.11 ND 0.15 0.020 ND	mg/L mg/L mg/L mg/L mg/L mg/L	0.0050 0.010 0.0050 0.010 0.010 0.00020	7060 6010 6010 6010 7421 7470	10 SEP 10 SEP 10 SEP 10 SEP 10 SEP 13 SEP	92 12 92 19 92 19 92 19 92 19 92 10 92 10	SEP SEP SEP SEP SEP SEP SEP SEP	92 92 92 B 92 92 92 92

Note B : Compound is also detected in the blank.

ND = Not detected NA = Not applicable

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Reported By: Jeff Malecha

Approved By: Sandra Jones

Enseco A Corrung Company

Metals

Total Metals

Client Name: Client ID: Lab ID: Matrix: Authorized:	Northwest Pipelin WASTE OIL TANK CE 024601-0002-SA WASTE 19 AUG 92	e Corporati DAR HILL Sampled: Prepared:	on 18 AUG 93 See Belon	2 Receive w Analyze	ed: 19 AUG 9; ed: See Belou	2
Parameter	Result	F Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic Cadmium Chromium Lead	ND ND 1.0 2.8	mg/kg mg/kg mg/kg mg/kg	1.0 0.50 1.0 2.2	7060 6010 6010 7421	14 SEP 92 14 SEP 92 14 SEP 92 14 SEP 92 14 SEP 92	16 SEP 92 15 SEP 92 15 SEP 92 14 SEP 92

ND = Not detected NA = Not applicable Reported By: Bob Reilly

.

Approved By: Sandra Jones

General Inorganics

Enseco A Cornang Company

Client Name: Client ID: Lab ID: Matrix: Authorized:	Northwest Pipeline CEDAR HILL CDP WAS 024601-0001-SA AQUEOUS 19 AUG 92	e Corporat STE WATER Sampled Prepared	ion TANK I: 18 AUG 92 I: See Below	2 Received: w Analyzed:	19 AUG 92 See Below	2
Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
рН	4.9	units		9040	NA	19 AUG 92
Halogen	c as _. Cl 71.4	ug/L	30.0	9020	NA	10 SEP 92
Total Dissol Solids	ved 498	mg/L	10.0	160.1	NA	25 AUG 92

ND = Not detected NA = Not applicable

Reported By: Pam Rosas

Approved By: Steve Shurgot

•						-			z r
				General Inorganics Pipeline Corporation TANK CEDAR HILL D2-SA Sampled: 18 AUG 92 Prepared: See Below Reporting Analytical Sult Units Sult Units Frequency Sult Units Method Method Mainter See See See See See See See See See See					
	Client Name: Client ID: Lab ID: Matrix: Authorized:	Northwe WASTE (024601- WASTE 19 AUG	est Pipel DIL TANK -0002-SA 92	ine Corporat CEDAR HILL Sampled Prepared	ion : 18 AUG 9 : See Belo	12 R W A	eceived: nalyzed:	19 AUG 9 See Belo	2 W
	Parameter		Result	Units	Reporting Limit	Analytic Method	al	Prepared Date	Analyzed Date
	Ignițability		>160	deg. F		1010	I	NA	03 SEP 92 o
	Halogen a	s C1	ND	mg/kg	3.0	9020	I	NA	15 SEP 92

Note o : This test is unreliable for any sample other than a non-aqueous liquid. ND = Not detected NA = Not applicable Reported By: Leslie Gergurich Approved By: Steve Shurgot

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Quality Control Report

The Enseco laboratories operate under a vigorous QA/QC program designed to ensure the generation of scientifically valid, legally defensible data by monitoring every aspect of laboratory operations. Routine QA/QC procedures include the use of approved methodologies, independent verification of analytical standards, use of Duplicate Control Samples to assess the precision and accuracy of the methodology on a routine basis, and a rigorous system of data review.

In addition, the Enseco laboratories maintain a comprehensive set of certifications from both state and federal governmental agencies which require frequent analyses of blind audit samples. Enseco-Rocky Mountain Analytical Laboratory is certified by the EPA under the EPA/CLP program for Organic analyses, under the USATHAMA (U.S. Army) program, by the Army Corps of Engineers, and the states of Colorado, New Jersey, Utah, and Florida, among others.

The standard laboratory QC package is designed to:

- 1) establish a strong, cost-effective QC program that ensures the generation of scientifically valid, legally defensible data
- assess the laboratory's performance of the analytical method using control limits generated with a well-defined matrix
- 3) establish clear-cut guidelines for acceptability of analytical data so that QC decisions can be made immediately at the bench, and
- 4) provide a standard set of reportables which assures the client of the quality of his data.

The Enseco QC program is based upon monitoring the precision and accuracy of an analytical method by analyzing a set of Duplicate Control Samples (DCS) at frequent, well-defined intervals. Each DCS is a well-characterized matrix which is spiked with target compounds at 5-100 times the reporting limit, depending upon the methodology being monitored. The purpose of the DCS is not to duplicate the sample matrix, but rather to provide an interference-free, homogeneous matrix from which to gather data to establish control limits. These limits are used to determine whether data generated by the laboratory on any given day is in control.

Control limits for accuracy (percent recovery) are based on the average, historical percent recovery +/- 3 standard deviation units. Control limits for precision (relative percent difference) range from 0 (identical duplicate DCS results) to the average, historical relative percent difference + 3 standard deviation units. These control limits are fairly narrow based on the consistency of the matrix being monitored and are updated on a quarterly basis.

For each batch of samples analyzed, an additional control measure is taken in the form of a Single Control Sample (SCS). The SCS consists of a control matrix that is spiked with either representative target compounds or surrogate compounds appropriate to the method being used. An SCS is prepared for each sample lot for which the DCS pair are not analyzed.

Accuracy for DCS and SCS is measured by Percent Recovery.

% Recovery = _____ X 100 Actual Concentration

Precision for DCS is measured by Relative Percent Difference (RPD).

RPD = (Measured Concentration DCS1 - Measured Concentration DCS2) X 100 (Measured Concentration DCS1 + Measured Concentration DCS2)/2 All samples analyzed concurrently by the same test are assigned the same QC lot number. Projects which contain numerous samples, analyzed over several days, may have multiple QC lot numbers associated with each test. The QC information which follows includes a listing of the QC lot numbers associated with each of the samples reported, DCS and SCS (where applicable) recoveries from the QC lots associated with the samples, and control limits for these lots. The QC data is reported by test code, in the order that the tests are reported in the analytical results section of this report.

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QC LOT ASSIGNMENT REPORT Organics by Chromatography

Laboratory Sample Number	QC Matrix	QC Category	QC Lot Number (DCS)	QC Run Number (SCS/BLANK)
024601-0001-SA	AQUEOUS	602-A	18 AUG 92-1H	22 AUG 92-1H
024601-0003-TB	AQUEOUS	602-A	18 AUG 92-1H	24 AUG 92-1H

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DUPLICATE CONTROL SAMPLE REPORT Organics by Chromatography

4 1 + -	Conc	entration	Moscurod		Acc	uracy	Precis	sion
DCS1 DCS2		AVG	DCS	Limits	DCS L	imit		
Category: 602-A Matrix: AQUEOUS QC Lot: 18 AUG 92-1H Concentration Units: ug/L								
Benzene Toluene Ethylbenzene Xylenes (total) 1,3-Dichlorobenzene	5.0 5.0 5.0 5.0 5.0	5.28 4.99 4.85 4.82 4.83	5.29 5.01 4.89 4.88 4.94	5.28 5.00 4.87 4.85 4.88	106 100 97 97 98	72-112 74-109 76-105 74-111 72-121	0.2 0.4 0.8 1.2 2.3	10 10 10 10 15

Calculations are performed before rounding to avoid round-off errors in calculated results.

SINGLE CONTROL SAMPLE REPORT Organics by Chromatography

Analyte	Concentra Spiked	ation Measured	Accur SCS	acy(%) Limits
Category: 602-A Matrix: AQUEOUS QC Lot: 18 AUG 92-1H QC Run: Concentration Units: ug/L	22 AUG 92-1H			
a,a,a-Trifluorotoluene	30.0	31.2	104	90-113
Category: 602-A Matrix: AQUEOUS QC Lot: 18 AUG 92-1H QC Run: Concentration Units: ug/L	24 AUG 92-1H			
a,a,a-Trifluorotoluene	30.0	30.9	103	90-113

Calculations are performed before rounding to avoid round-off errors in calculated results.

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METHOD BLANK REPORT Organics by Chromatography

Analyte		Result	Units	Reporting Limit
Test: 8020-BTEX-AP Matrix: AQUEOUS QC Lot: 18 AUG 92-1H	QC Run:	22 AUG 92-1H		
Benzene Toluene Ethylbenzene Xylenes (total)		ND ND ND ND	ug/L ug/L ug/L ug/L	0.50 0.50 0.50 0.50
Test: 8020-BTEX-AP Matrix: AQUEOUS QC Lot: 18 AUG 92-1H	QC Run:	24 AUG 92-1H		
Benzene Toluene Ethylbenzene Xylenes (total)		ND ND ND ND	ug/L ug/L ug/L ug/L	0.50 0.50 0.50 0.50

QC LOT ASSIGNMENT REPORT Metals Analysis and Preparation

Laboratory Sample Number	QC Matrix	QC Category	(DCS)	(SCS/BLANK)
024601-0001-SA	AQUEOUS	ICP-AT	10 SEP 92-1A	10 SEP 92-1A
024601-0001-SA	AQUEOUS	AS-FAA-AT	10 SEP 92-1A	10 SEP 92-1A
024601-0001-SA	AQUEOUS	PB-FAA-AT	10 SEP 92-1A	10 SEP 92-1A
024601-0001-SA	AQUEOUS	HG-CVAA-AT	13 SEP 92-1A	13 SEP 92-1A
024601-0002-SA	SOIL	AS-FAA-S	11 SEP 92-1A	11 SEP 92-1A
024601-0002-SA	SOIL	ICP-S	14 SEP 92-1R	14 SEP 92-1R
024601-0002-SA	SOIL	PB-FAA-S	14 SEP 92-1R	14 SEP 92-1R

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DUPLICATE CONTROL SAMPLE REPORT Metals Analysis and Preparation

	Cor	ncentratio)n Messured		Acc	uracy	Precis	sior
Analyte	Зрікеа	DCS1	DCS2	AVG	DCS	age(%) Limits	DCS L) imit
Category: ICP-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: mg/L								
Aluminum Antimony Arsenic Barium Beryllium Cadmium Calcium Chromium Cobalt Copper Iron Lead Magnesium Manganese Nickel Potassium Silver Sodium Vanadium Zinc	$\begin{array}{c} 2.0\\ 0.5\\ 0.5\\ 2.0\\ 0.05\\ 0.05\\ 100\\ 0.2\\ 0.5\\ 1.0\\ 0.5\\ 50\\ 0.5\\ 50\\ 0.5\\ 100\\ 0.5\\ 0.5\\ 0.5\\ 0.5\\ 0.5\\ 0.5\\ 0.5\\ 0$	2.03 0.510 0.480 1.92 0.0500 0.0468 103 0.190 0.471 0.281 1.01 0.472 51.1 0.489 0.483 52.5 0.0488 110 0.495 0.496	$\begin{array}{c} 2.04\\ 0.499\\ 0.453\\ 1.93\\ 0.0497\\ 0.0442\\ 102\\ 0.195\\ 0.467\\ 0.269\\ 1.00\\ 0.475\\ 50.6\\ 0.477\\ 0.478\\ 51.9\\ 0.0477\\ 109\\ 0.497\\ 0.489\end{array}$	2.03 0.505 0.467 1.92 0.0498 0.0455 103 0.192 0.469 0.275 1.01 0.473 50.8 0.483 0.483 0.483 109 0.496 0.492	102 101 93 96 100 91 103 96 94 110 101 95 102 97 96 104 97 109 99 98	75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125 75-125	0.2 2.2 5.7 0.6 5.7 1.0 2.6 9 4.4 0.7 1.0 2.5 1.1 2.2 1.6 0.4 1.6	
Category: AS-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: mg/L							τα ^τ - Υ	
Arsenic	0.03	0.0329	0.0348	0.0338	113	75-125	5.6	2
Category: PB-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: mg/L								
Lead	0.03	0.0349	0.0313	0.0331	110	75-1 25	11	2

Calculations are performed before rounding to avoid round-off errors in calculated results.

DUPLICATE CONTROL SAMPLE REPORT Metals Analysis and Preparation (cont.)

	Co	oncentrati	on		Acc	uracy	Preci	sion
Analyte	Spiked	DCS1	Measure DCS2	d AVG	Aver DCS	age(%) Limits	(RPD DCS L) imit
Category: HG-CVAA-AT Matrix: AQUEOUS QC Lot: 13 SEP 92-1A Concentration Units: mg/L	0 0010	0 000967	0 00100 0	0 000093	08	75, 195	2.4	20
mercury	0.0010	0.000907	0.00100	0.000903	30	/5-125	3.4	20
Category: AS-FAA-S Matrix: SOIL QC Lot: 11 SEP 92-1A Concentration Units: mg/kg								
Arsenic	145	102	104	103	71	59-141	1.0	20
Category: ICP-S Matrix: SOIL QC Lot: 14 SEP 92-1R Concentration Units: mg/kg	I							
Aluminum Antimony Arsenic Barium Beryllium Cadmium Calcium Chromium Cobalt Copper Iron Lead Magnesium Manganese Molybdenum Nickel Potassium Silver Sodium Vanadium	10700 55.2 145 503 129 154 7390 151 122 162 15400 148 3740 423 159 166 4050 104 747	6840 54.8 128 435 118 140 6600 127 110 156 12400 129 3250 376 145 154 3530 98.2 717 135 478	7480 57.4 135 459 124 147 6960 136 116 165 13400 139 3480 397 152 162 3770 106 766 142 504	7160 56.1 131 447 121 144 6780 132 113 161 12900 134 3360 387 148 158 3650 102 741 138 491	67 102 91 89 93 92 87 93 92 87 93 99 90 91 93 90 91 93 90 99 90	47-153 18-362 59-141 76-124 53-131 68-132 79-121 66-133 70-130 70-132 66-134 66-135 74-126 74-125 71-129 67-133 68-132 76-124 57-130 73-127 65-135	8.695964944290511666623 5.59649442905511666623	2C 5C 2C 2C 2C 2C 2C 2C 2C 2C 2C 2C 2C 2C 2C

Calculations are performed before rounding to avoid round-off errors in calculated results.

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DUPLICATE CONTROL SAMPLE REPORT Metals Analysis and Preparation (cont.)

Analyte	Conc Spiked	entratio	n Measured		Acc Aver	uracy age(%)	Precis (RPD)	ion
	•	DCS1	DCS2	AVG	DCS	Limits	DĊS Li	mit
Category: PB-FAA-S Matrix: SOIL QC Lot: 14 SEP 92-1R Concentration Units: mg/kg								
Lead	150	132	148	140	93	50-1 50	11	20

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Calculations are performed before rounding to avoid round-off errors in calculated results.

METHOD BLANK REPORT Metals Analysis and Preparation

Analyte		Resul	lt	Units	Reporting Limit
Test: ICP-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Barium Cadmium Chromium	QC Run:	10 SEP 92-1A 0.00	ND 99 ND	mg/L mg/L mg/L	0.010 0.0050 0.010
Test: AS-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Arsenic	QC Run:	10 SEP 92-1A	ND	mg/L	0.0050
Test: PB-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Lead	QC Run:	10 SEP 92-1A	ND	mg/L	0.0050
Test: HG-CVAA-AT Matrix: AQUEOUS QC Lot: 13 SEP 92-1A Mercury	QC Run:	13 SEP 92-1A	ND	mg/L	0.00020
Test: AS-FAA-W Matrix: WASTE QC Lot: 11 SEP 92-1A Arsenic	QC Run:	11 SEP 92-1A	ND	mg/kg	0.50
Test: ICP-W Matrix: WASTE QC Lot: 14 SEP 92-1R Cadmium Chromium	QC Run:	14 SEP 92-1R	ND ND	mg/kg mg/kg	0.50 1.0

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METHOD BLANK REPORT Metals Analysis and Preparation (c	ont.)			
Analyte	Result	Units	Reporting Limit	
Test: PB-FAA-W Matrix: WASTE QC Lot: 14 SEP 92-1R QC Run: 14	SEP 92-1R			
Lead	ND	mg/kg	0.50	

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QC LOT ASSIGNMENT REPORT Wet Chemistry Analysis and Preparation

Laboratory Sample Number	QC Matrix	QC Category	(DCS)	QC Run Number (SCS/BLANK)
024601-0001-SA	AQUEOUS	PH-A	19 AUG 92-1G	25 AUG 92-1A
024601-0001-SA	AQUEOUS	TDS-A	25 AUG 92-1A	
024601-0001-SA	AQUEOUS	TOX-A	10 SEP 92-1A	
024601-0002-SA	SÕIL	TOX-S	15 SEP 92-1A	

DUPLICATE CONTROL SAMPLE REPORT Wet Chemistry Analysis and Preparation

	Cone	centratio	1		Acc	uracy	Precis	sion
Analyte	Spiked	DCS1	DCS2	AVG	Aver DCS	age(%) Limits	(RPD) DCS Li) imit
Category: PH-A Matrix: AQUEOUS QC Lot: 19 AUG 92-1G Concentration Units: units								_
pH	9.1	9.04	9.05	9.04	99	98-102	0.1	5
Category: TDS-A Matrix: AQUEOUS QC Lot: 25 AUG 92-1A Concentration Units: mg/L								
Total Dissolved Solids	1170	1150	1130	1140	97	90-110	1.8	10
					•		1.0	
Category: TOX-A Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: ug C1/L								
Total Organic Halogen as Cl	100	90.0	90.6	90.3	90	80-120	0.7	20
Category: TOX-S Matrix: SOIL QC Lot: 15 SEP 92-1A Concentration Units: mg/kg								
Total Organic Halogen as Cl	1.0	0.955	1.05	1.00	100	75-125	9.5	20

Calculations are performed before rounding to avoid round-off errors in calculated results.

METHOD BLANK REPORT Wet Chemistry Analysis and Preparation

Analyte	Result	Units	Reporting Limit
Test: TDS-BAL-A Matrix: AQUEOUS QC Lot: 25 AUG 92-1A QC Run:	25 AUG 92-1A		
Total Dissolved Solids	ND	mg/L	10.0

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		24001		White			ENS-1133
\$/19/92	(Thistery	NANK COPROJECT NUMBER	E N				
		EIVED FOR LAB	-2:C7	8/18/52	treac Lillig	Here .	Ven lo
		HOD OF SHIPMENT	TIME	DATE	RECEIVED BY (SIGNED)	ED BY (SIGNED)	RELINQUISH
		IVERED TO SHIPPER BY	DEL				
	SHIPPING DETAILS				RANSFERS PRIOR TO SHIPPING		
		1/2	1550 0	AC HIL	CIL TANK CEDI	2.00 WASTE	18-921
		12	USEDO	HILL.	CIL THAIK CEDAK	1:50 WASTE	18-921
60		14	WSED C	1114	FOIL TANK CEDAR	145 WHST	126-31-
		2	USED O	711H 24	E OLL TANK OFOR	1:30 WAST	126-91-
V old	x SINGLE	D 15 TA	Liqui	2		2:40 (1	126-31-
2 d1	X SINGLE	0 15 TE	4901			12:40 11	26-31.
2 of	ETALS	45 47 m	HICTA	1		", 24:2	18-921
)d1 01	TALS	1 1 2 2 4 7 ME	THE CH			2:45- 11	-18-92
- CD	105	Cred / bH	ACLE			2:5C "	1215-31-
0	1/705 <	$\frac{1}{1} \frac{1}{1} \frac{1}{1}$	C Have	F THU	HE HILL COD WHITE	12:49 CEDIS	26-31-
REMARKS	ANALYSIS PARAMETERS	TYPE # CONTAINERS	SAMPLE	1	SAMPLE ID/DESCRIPTION	TIME	DATE
	CONTENTS TEMP						
© Until	Done Continuin						
NITIAL CONTENTS TEMP. °C		ALED FOR SHIPPING BY	SE				SAMPLING COMPANY
CONDITION OF CONTENTS	PLING COMPANY	AL INTACT UPON RECEIPT BY SAM	SE				PROJECT
SEAL NUMBER		CKED BY					ENSECO CLIENT
SN	SAMPLE SAFE" CONDITIO						
431-7171	Arvada, CO 80002 303/421-6611 FAX: 303/4	Company	A Corning	l		CHRTONY	
	4955 Yarrow Street	Š	Fince	Ĵ	·		
horatory	Rocky Mountain Analytical La		1				

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APPENDIX B

SPILL CONTROL PROCEDURES



MANUAL O & M Procedure		
SECTION	DOCUMENT NO.	
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EFFECTIVE DATE	PAGE NO.	
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ENERGY SERVICES

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

A. PURPOSE AND SCOPE

- A.1 To establish the policy and procedure for preventing, controlling, and reporting of discharges or spills of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
 - A.2 This document pertains to Company personnel and Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.
 - B. CONTENTS
 - C. POLICY
 - C.1 General
 - C.2 Bulk Storage Tanks
 - C.3 Facility Drainage
 - C.4 Transfer Operations, Pumping, and In-Plant/Station Process
 - C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack
 - D. PROCEDURE
 - D.1 Identifying, Containing and Initial Reporting of a discharge or Spill of a Hazardous or Toxic Substance
 - D.2 Submitting Written Notification of a Discharge or Spill

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

- C. POLICY
- C.1 GENERAL
- C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to, fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.

MANUAL	
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- C.1.2 Oil, for purpose of this document, means oil of any kind or in any form, including but not limited to petroleum hydrocarbon, fuel oil, Y grade, natural gas liquids, condensate, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) is not considered to be oil.
- C.1.3 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
 - a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
 - b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act
 - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
 - d. Section 112 of the Clean Air Act

ENERGY SERVICES

- e. Section 7 of the Toxic Substance Control Act
- C.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof, and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the applicable federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
 - a. Non-Transportation Related Facilities
 - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.

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	section Safety / General	DOCUMENT NO. 21.10.020
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(2) Underground storage facilities having a total capacity in excess of 42,000 gallons.

b. Transportation Related Facilities

- All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.
- C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.
- C.1.8 The facility superintendent is responsible for spill prevention. His/her duties include, but are not limited to, the following:
 - a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
 - b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
 - c. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.
- C.1.9 Each individual facility is checked annually by the superintendent or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
 - a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.
 - b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.

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- c. An annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.
- C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at regular scheduled intervals for accumulation of oil or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

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- C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the oil or substance stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.
- C.2.2 The facility superintendent should evaluate tank level monitoring requirements to prevent tank overflow.
- C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.
- C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

C.3 FACILITY DRAINAGE

- C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from diked areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.
- C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.

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- C.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.
- C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:
 - a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation, or displacement by foreign materials.
 - b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.
 - c. Any dike three feet or higher should have a minimum cross section of two feet at the top.
- C.3.5 Other means of containment or spill control include, but are not limited to:
 - a. Berms or retaining walls;
 - b. Curbing;
 - c. Culverting, gutters, or other drainage systems;
 - d. Weirs, booms, or other barriers;
 - e. Spill diversion ponds or retention ponds;
 - f. Sorbent materials

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

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

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

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

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- C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets which may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.
 - NOTE: LPG loading facilities and remote field loading of condensate are exempt from the C.5 requirements of this document.

D. PROCEDURE

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

Any Employee

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

NOTE: Refer to Attachment A for containment procedures.

Facility Superintendent

- D.1.2 Contacts Gas Control and responsible Director <u>immediately</u> 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)

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Gas Control Personnel

- D.1.3 Advises Environmental Affairs departments <u>immediately</u> by telephone concerning the incident including any incidents reported by persons not employed with the Company.
 - NOTE: If Gas Control is contacted by a person not employed with the Company, the necessary information is obtained as indicated in D.1.2 and the Superintendent and Environmental Affairs are immediately contacted to begin containment and clean-up of the discharge or spill.
- D.1.4 If Environmental Affairs cannot be contacted, notifies Director over Environmental Affairs.

Facility Superintendent

- D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.
- D.1.6 If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).
- D.1.7 Advises Environmental Affairs by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

Environmental Affairs

- D.1.8 Assesses reporting requirements to state and federal agencies (contacts Legal Department and Right-of-Way Department, if appropriate). (See Emergency Operating Procedure Manuals).
- D.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.
- D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Superintendent

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

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following:

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

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

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

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ATTACHMENT A

DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS

TYPE OF FACILITY WHERE THE DISCHARGE OR SPILL OCCURS	CONTAINMENT PROCEDURES	MATERIALS USED FOR CONTAINMENT
A. Oil Pipeline (as defined in C.1.4)	 Closes appropriate block valves. Contains Discharge or spill by: Ditching covering, applying sorbents, constructing an earthen dam, or burning. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. 	<pre>1.Straw 2.Lcose Earth 3.Oil Sorbent 3M Brand 4.Plain Wood chips 5.Sorb-Oil Chips Banta Co. 6.Sorb-Oil Swabs Banta Co. 7.Sorb-Oil Mats Banta Co. 8.Or Equivalent Materials</pre>
B. Vehicle	 Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, apply sorbents, or burning. Notifies immediately the Safety and Environmental Department and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. 	
	Note: Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.	
C. Bulk Storage Tanks	1. Contains discharge or spill by:	



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or any other Facilities	<pre>ditching, covering, applying sorbents, constructing an earthen dam, or burning. 2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</pre>	
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APPENDIX C

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

istrict I • (505) 393-6161 State O O. Box 1980 Energy Minerals and obbs, NM 88241-1980 Oil Cons istrict II • (505) 748-1283 Oil Cons 11 South First 2040 S rtesia, NM 88210 Santa Fe 000 Rio Brazos Road (5 ztec, NM 87410 (5	f New Mexico Natural Resources Department Pervation Division South Pacheco Street New Mexico 87505 05) 827-7131	Form C- 14 Originated 2/13/ Submit 2 copies Appropriate Distr Office in accordan with Rule 116		
<u>(istrict IV</u> · (505) 827-7131	tion and Corrective Action			
Release Notifica	OPERATOR	Initial Report Final Rep		
Name	Contact			
Address	Telephone No.			
Facility Name	Facility Type			
Surface Owner Mineral Ov	rner	Lease No.		
I OC AT	ION OF RELEASE			
Unit Letter Section Township Range Feet from the North/Sou	th Line Feet from the East/West Line Co	ounty		
NATU	RE OF RELEASE			
type of Release	volume of Release	volume Recovered		
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery		
Was Immediate Notice Given?	If YES, To Whom?	I		
By Whom?	Date and Hour			
Was a Watercourse Reached?	If YES, Volume Impacting the V	If YES, Volume Impacting the Watercourse.		
If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If	Necessary)			
Describe Cause of Problem and Remedial Action Taken. (Attach Additional S	heets If Necessary)			
Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheet	: If Necessary)			
I hereby certify that the information given above is true and complete to the be are required to report and/or file certain release notifications and perform correc a C-141 report by the NMOCD marked as "Final Report" does not relieve the op contamination that pose a threat to ground water, surface water, human health of operator of responsibibility for compliance with any other federal, state, or local	it of my knowledge and understand that pursuant tive actions for releases which may endanger public erator of liability should their operations have fail or the environment. In addition, NMOCD accepta laws and/or regulations.	to NMOCD rules and regulations all opera c health or the environment. The acceptan ed to adequately investigate and remediate ance of a C-141 report does not relieve the		
Signature:	<u>OIL CONSER</u>	WATION DIVISION		
Printed Name:	Approved by District Supervisor.			
Tide:	Approval Date:	Expiration Date:		
Date: Phone:	Conditions of Approval:	Attached		

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116 RELEASE NOTIFICATION AND CORRECTIVE ACTION [1-1-50...2-13, A, 3-15-97]

116.A. NOTIFICATION

(1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]

(2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]

116.B. REPORTING REQUIREMENTS: Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]

(1) A Major Release shall be reported by giving both immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:

- (a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;
- (b) an unauthorized release of any volume which:
 - (i) results in a fire;
 - (ii) will reach a water course;
 - (iii) may with reasonable probability endanger public health; or
 - (iv) results in substantial damage to property or the environment;
- (c) an unauthorized release of natural gases in excess of 500 mcf; or
- (d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]

(2) A Minor Release shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

(1) Immediate verbal notification required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141. [5-22-73...2-1-96; A, 3-15-97]

(2) Timely written notification is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. [5-22-73...2-1-96; A, 3-15-97]

116.D. CORRECTIVE ACTION: The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A.19). [3-15-97]

