PERMITS, RENEWALS, & MODS Application

Cirrus Consulting, LLC

February 16, 2010

SOID LEB 18 D S: 18 BECEINED OCD

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

Subject:

Four Discharge Plan Renewal Applications

Williams Four Corners, LLC GW-320, 321, 322 and 323

Dear Mr. von Gonten:

On behalf of Williams Four Corners, LLC, Cirrus Consulting, LLC submitted the Discharge Plan renewal applications for the following facilities via email to you on February 15, 2010:

- Richardson Straddle Compressor Station (GW-320)
- Glade Compressor Station (GW-321)
- Lawson Straddle Compressor Station (GW-322)
- Horton Straddle Compressor Station (GW-323)

A copy of the email was also forwarded to Brandon Powell, OCD District 3.

Enclosed please find a check for \$400 to cover the filing fees for the applications.

If any additional information is needed, please contact me at the number below or Aaron Dailey of Williams Four Corners, LLC at (505) 632-4708.

Sincerely.

Ingrid Deklau

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge re	eceipt of check No _	·	dated 2/16/10
or cash received on	in the amou	int of \$	
from <u>Cirrus</u> Cons	ulting, LLC		
for <u>GW-321</u>	0		
Submitted by: Kimb	enly R Sanc	hez Date:	2/19/10
Submitted to ASD by	U		<i>•</i>
Received in ASD by:			
Filing Fee	New Facility	Renewal	·
Modification	Other		-
Organization Code	<u>521.07</u>	Applicable FY <u>2004</u>	
To be deposited in the Wa	ter Quality Manager	ment Fund.	
Full Payment	or Annual Increr	nent	

WILLIAMS FIELD SERVICES GLADE COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS (August 29, 2005)

- 1. Payment of Discharge Permit Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
- 2. <u>Williams Field Services Commitments:</u> Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated June 29, 2005 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
 - 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 6. <u>Above Ground Tanks:</u> All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <u>Above Ground Saddle Tanks:</u> Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

Page 1 of 3

9. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the

OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 11. <u>Class V Wells</u>: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
 - 14. <u>Transfer of Discharge Permit:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Storm Water Permit:</u> Williams Field Services shall maintain storm water runoff controls. As a result of Williams Field Services' operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

Page 2 of 3

16. <u>Closure:</u> The OCD will be notified when operations of the Glade Compressor Station are

discontinued for a period in excess of six months. Prior to closure of the Glade Compressor Station a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by David Bay

SR. ENV. SPECIALIST

Title



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

August 29, 2005

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

Mr. David Bays Williams Field Services 188 CR 4900 Bloomfield, New Mexico 87413

RE: Discharge Permit Renewal GW-321

Williams Field Services Glade Compressor Station San Juan County, New Mexico

Dear Mr. Bays:

The ground water discharge permit renewal application GW-321 for the Williams Field Services Glade Compressor Station located in the NW/4 SW/4 of Section 30, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.

The original discharge permit application was submitted on March 31, 2000 and approved June 27, 2000. The discharge permit renewal application letter, dated June 29, 2005, submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge permit is renewed pursuant to 20 NMAC 3106.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provides for possible future amendment or modifications of the permit. Please be advised that approval of this permit does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Mr. David Bays GW-321 Glade Compressor Station August 29, 2005 Page 2

Pursuant to 20 NMAC 3109.G.4., this renewal permit is for a period of five years. This renewal will expire on **June 27, 2010**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge permit facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge permit.

The discharge permit renewal application for the Williams Field Services Glade Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a fee equal to the filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The OCD has received the filing fee.

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

Sincerely,

Roger C. Anderson

Chief, Environmental Bureau

Oil Conservation Division

RCA/wjf Attachment

xc: OCD Aztec Office

WILLIAMS FIELD SERVICES GLADE COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS

(August 29, 2005)

- 1. Payment of Discharge Permit Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
- 2. <u>Williams Field Services Commitments:</u> Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated June 29, 2005 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
 - 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 6. <u>Above Ground Tanks:</u> All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
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- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

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OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
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- 12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
 - 14. <u>Transfer of Discharge Permit:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
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Page 2 of 3

16. <u>Closure:</u> The OCD will be notified when operations of the Glade Compressor Station are

discontinued for a period in excess of six months. Prior to closure of the Glade Compressor Station a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. <u>Certification:</u> Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Title
WILLIAMS FIELD SERVICES
Accepted:

OCD copy

ATTACHMENT TO THE DISCHARGE PLAN GW-321 WILLIAMS FIELD SERVICES GLADE COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS

(June 27, 2000)

- 1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a flat fee assessed for compressor stations with horsepower rating greater than 1001 horsepower but less than 3000 horsepower equal to \$690.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
- 2. <u>Williams Field Services Commitments:</u> Williams Field Services will abide by all commitments submitted in the discharge plan application dated March 31, 2000 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
- 4. <u>Drum Storage</u>: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
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- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Storm Water Plan:</u> The facility will have an approved storm water run-off plan.

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

Accepted:

WILLIAMS FIELD SERVICES

Title Son Enell Spee



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

June 27, 2000

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9665

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

RE: Discharge Plan Approval GW-321

Williams Field Services
Glade Compressor Station
San Juan County, New Mexico

Dear Ms. Deklau:

The ground water discharge plan GW-321 for the Williams Field Services Glade Compressor Station located in the NW/4 SW/4 of Section 30, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.

The original discharge plan application was submitted on March 31, 2000 pursuant to Section 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Ms. Ingrid Deklau GW-321 Glade Compressor Station June 27, 2000 Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **June 27**, 2005, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

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

The discharge plan application for the Williams Field Services Glade Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of \$50. There is a flat fee assessed for compressor stations with horsepower rating greater than 1001 horsepower but less than 3000 horsepower equal to \$690.00. The OCD has received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 827-7156. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge

plan review.

Sincerely,

Roger C. Anderson

Chief, Environmental Bureau Oil Conservation Division

RCA/wjf Attachment

xc: OCD Aztec Office

CERTIFIED MAIL RECEPT

(Domestic Mail Only, No Insurance Coverage Provided)

Article Sent To

Postage

Postage

Return Relation Fee Condition of Postmark Here

Restricted Deliver (See (Endorsement Reculted)

Total Postage & Fees

Name (Please Print Clearly) (To be completed by maller)

Street, Apt. No.; or PO Box No.

City, State, ZIP+4

Section Section (Institutions)

ATTACHMENT TO THE DISCHARGE PLAN GW-321 WILLIAMS FIELD SERVICES GLADE COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS

(June 27, 2000)

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by
WILLIAMS FIELD SERVICES
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