

GW - 322

**PERMITS,
RENEWALS,
& MODS
Application**

Cirrus Consulting, LLC

February 16, 2010

RECEIVED OCD
2010 FEB 18 P 2:19

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:

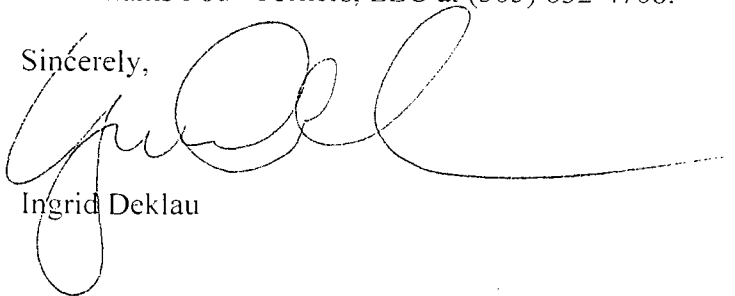
- Richardson Straddle Compressor Station (GW-320)
- Glade Compressor Station (GW-321)
- Lawson Straddle Compressor Station (GW-322) ✓
- Horton Straddle Compressor Station (GW-323)

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 receipt of check No. [REDACTED] dated 2/16/10

or cash received on _____ in the amount of \$ 100.00

from Cirrus Consulting, LLC

for GW-32T 322 JG

Submitted by: Kimberly R Sanchez Date: 2/19/10

Submitted to ASD by: Kimberly R Sanchez Date: 2/19/10

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

Cirrus Consulting, LLC
1713 N. Sweetwater Lane
Farmington, Utah 84025

GW-32T
322 JG

97 7751
3243

Date Feb 19 2010

Pay to the Order of Water Quality Management Fund \$ 100.00
one hundred & 00/100 Dollars ☒ Security details on back.

America First Credit Union
326 N. Main Street
Kaysville, Utah 84037

For William Lawson [Signature] MP

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-322
WILLIAMS FIELD SERVICES
LAWSON STRADDLE COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(August 29, 2005)

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

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

16. Closure: The OCD will be notified when operations of the Lawson Straddle Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Lawson Straddle 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-322
Williams Field Services
Lawson Straddle Compressor Station
San Juan County, New Mexico

Dear Mr. Bays:

The ground water discharge permit renewal application GW-322 for the Williams Field Services Lawson Straddle Compressor Station located in the SE/4 SW/4 of Section 36, Township 32 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-322 Lawson Straddle 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 Lawson Straddle Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a fee equal to the filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The OCD has received the filing fee.

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

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-322
WILLIAMS FIELD SERVICES
LAWSON STRADDLE COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(August 29, 2005)

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

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
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12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
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17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by _____

Title

ATTACHMENT TO THE DISCHARGE PLAN GW-322
WILLIAMS FIELD SERVICES
LAWSON COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS

(June 27, 2000)

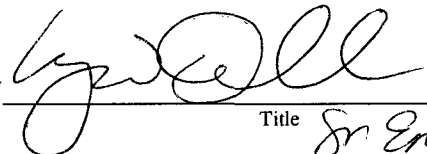
1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a flat fee assessed for compressor stations with horsepower rating greater than 1001 horsepower but less than 3000 horsepower equal to \$690.00. The required flat fee may be paid in a single payment due at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

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

Accepted:

WILLIAMS FIELD SERVICES

by 
Title *Sr. Enutll Spee*



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

June 27, 2000

CERTIFIED MAIL

RETURN RECEIPT NO. 5050 9672

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

**RE: Discharge Plan Approval GW-322
Williams Field Services
Lawson Compressor Station
San Juan County, New Mexico**

Dear Ms. Deklau:

The ground water discharge plan GW-322 for the Williams Field Services Lawson Compressor Station located in the SE/4 SW/4 of Section 36, Township 32 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-322 Lawson 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 Lawson Compressor Station.

The discharge plan application for the Williams Field Services Lawson 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

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

7099 3220 0000 5050 9672

Postmark Here

PM USPS

29 2000

WFS

GW-322

See Reverse for Instructions

ATTACHMENT TO THE DISCHARGE PLAN GW-322
WILLIAMS FIELD SERVICES
LAWSON COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(June 27, 2000)

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Accepted:

WILLIAMS FIELD SERVICES

by _____
Title