

GW - 322

**GENERAL
CORRESPONDENCE**

YEAR(S):

2006 → 2000

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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.

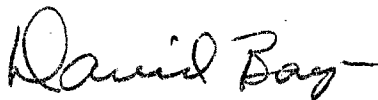
Please see the attached Table 1 and Table 2, from the recent OCD Discharge Plan renewal application for Williams' Rosa Compressor Station, for an example of how the updates apply at a typical Williams' facility. The updated information is indicated by bold text. We will update this information in each 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.

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)
Quintana 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 do not discharge wastewater to surface or subsurface waters. All wastes generated at these facilities are temporarily stored in tanks or containers.

Respectfully submitted,



David Bays
Senior Environmental Specialist

Attachment

Table 1
Transfer, Storage and Disposal of Process Fluids, Effluent and Waste Solids

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	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/dispersed 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.

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

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

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

2006 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,

A handwritten signature in black ink that reads "David Bays".

David Bays
Senior Environmental Specialist

Attachments

xc: Clara Cardoza
Monica Sandoval
WFS FCA file 210



Environmental Affairs
188 CR 4900
Bloomfield, NM 87413
505/632-4625
505/632-4781 Fax

October 4, 2005

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

**Re: Discharge Plan GW-198, GW-187, GW-321, GW-323, GW-322 and GW-320
Application Renewal and Filing
Fees**

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan permit renewals for the following Williams Field Services (WFS) Compressor Stations:

- 29-6#3 (GW-198)
- La Cosa (GW-187)
- Glade (GW-321)
- Horton (GW-323)
- Lawson (GW-322)
- Richardson (GW-320)

Check number 4027004660 in the amount of \$600.00 was previously submitted to cover the filing fees. Williams Field Services appreciates your assistance in handling these applications and fees. If you have any questions or require additional information, please contact me at 505/632/4625.

Thank you,

Monica Sandoval
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III
FCA Environmental File 220

AFFIDAVIT OF PUBLICATION

Ad No. 52023

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):

Monday, July 25, 2005.

And the cost of the publication is \$168.46.

Connie Pruitt

ON 7/25/05 CONNIE PRUITT
appeared before me, whom I know personally
to be the person who signed the above
document.

Wynell Corey
My Commission Expires November 1, 2008.

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 the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-187) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their La Cosa compressor station located in the NE/4 NW/4, Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water and waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in above ground, closed-top steel tanks prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-198) - Williams Field Service, Mark J. Baretts, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their 29-6 #3 Compressor Station located in the NW/4 NE/4, Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Up to 3,000 barrels of produced water is generated on site and collected in containment vessels prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 140 to 640 feet with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-218) - Dawn Trucking Corporation, Mr. Barry Bond, (505) 327-6314, P.O. Box 1498, Farmington, New Mexico 87499-1498, has submitted a discharge renewal application for the Farmington facility located in the SW/4 NW/4, Section 19, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal in an OCD approved facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 1,575 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-219) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Richardson Straddle compressor station located in the SW/4 NE/4, Section 27, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in above ground, in a closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 110 to 180 feet with a total dissolved solids concentrations ranging from approximately 450 mg/l to 2400 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-321) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Glade compressor station located in the NW/4 SW/4, Section 30, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of 40 feet with a total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-322) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Lawson compressor station located in the SE/4 SW/4, Section 36, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of 51 feet with a total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-323) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Horton compressor station located in the SE/4 SE/4, Section 10, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge ranges in depth from 90 feet to 115 feet with a total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

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 may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, 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 to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant

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how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-198) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their 29-6 #3 Compressor Station located in the NW/4 NE/4, Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Up to 3,000 barrels of produced water is generated on site and collected in containment vessels prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is

an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 50 feet with a total dissolved solids of approximately 100 mg/l. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-215) - Permian Treating Chemicals, Inc., Gale Blackwell, P.O. Box 815, Tatum, New Mexico 88267, has submitted a discharge plan renewal application for their Tatum facility located in the NE/4 of Section 30, Township 12 South, Range 36 East, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in an above ground closed top tank prior to transport off-site for disposal at an OCD approved facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and

ist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Glade compressor station located in the NW/4 SW/4, Section 30, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of 40 feet with a total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-322) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900,

him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 18th day of July 2005.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION

SEAL

MARK FEISMIR, P.E.,
Director

Legal #77446

Pub. July 25, 2005

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 6/21/05,
or cash received on _____ in the amount of \$ 600.00
from Williams Field Services
for 6 Compressor Stations - see attached
Submitted by: [Signature] Date: 7-12-05
Submitted to ASD by: _____ Date: _____
Received in ASD by: _____ Date: _____
Filing Fee ☒ New Facility _____ Renewal ☒
Modification _____ Other _____
Organization Code 521.07 Applicable FY 2001
To be deposited in the Water Quality Management Fund.
Full Payment ☒ or Annual Increment _____

THIS MULTI-TONE 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 BACK.

Williams Field Services

PAY TO THE ORDER OF: **NEW MEXICO OIL CONSERVATION DIV
WATER QUALITY MANAGEMENT FUND
2040 S PACHECO**

PAY TO: **\$ 600.00** USD

**SANTA FE
UNITED STATES**

NM 87505

**Supplier Number
403816**

[Signature]
Authorized Signer



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

June 30, 2005

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

**Re: Discharge Plan GW-187, GW-322, GW-321, GW-320, GW-198, and GW-323
Application Renewal and Filing Fees**

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application renewal and check number 4027004660 for \$600.00 to cover the filing fee for the following Williams Field Services (WFS) Compressor Stations:

- La Cosa (GW-187)
- ✓ • Lawson (GW-322)
- Glade (GW-321)
- Richardson (GW-320)
- 29-6#3 (GW-198)
- Horton (GW-323)

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

Thank you,

Monica Sandoval
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III
FCA Environmental File 220

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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Compressor Station (Lawson Straddle Compressor Station, GW-321)

322

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, NM 87413

Contact Person: David Bays

Phone: 505-634-4951

3. Location: Section 36 Township 32 North Range 12 West
Submit large scale topographic map showing exact location.

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

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

6. Attach a description of all materials stored or used at the facility.

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

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

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

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

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

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

14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: David Bays

Title: Sr. Environmental Specialist

Signature: David Bays

Date: 06/29/2005

E-mail Address: david.bays@williams.com



**Lawson Straddle
Compressor Station**

**NMOCD
Discharge Plan
GW-322**

**Williams Field Services
188 CR 4900
Bloomfield, NM 87413**



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Lawson Straddle Compressor Station NMOCD Discharge Plan

Effective Date:

June 2005

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1.0 TYPE OF OPERATION

The Lawson Straddle Compressor Station was constructed in 2000 to provide various producers with natural gas gathering, compression, treatment, and delivery services through the Williams Field Services system.

2.0 LEGALLY RESPONSIBLE PARTY

Williams Field Services
188 CR 4900
Bloomfield, NM 87413
(505) 634-4951

Contact Person:

David Bays, Senior Environmental Specialist
Phone and Address, Same as Above

3.0 LOCATION OF FACILITY

The facility is located in Section 36, Township 32 North, Range 12 West, in San Juan County, New Mexico, approximately 8.3 miles north-northwest of Aztec, New Mexico. The facility latitude and longitude are North 36° 56.216,88' and West 108° 2.765,76'. A site location map is attached (USGS 7.5 Min. Quadrangles: Adobe Downs Ranch, New Mexico) as Figure 1.

4.0 LANDOWNER

Williams Field Services is leasing the subject property from:

State of New Mexico
State of New Mexico Land Office
Commercial Division
Box 1148
Santa Fe, NM 87504-1148
(505) 827-5760

5.0 FACILITY DESCRIPTION

This facility is a field compressor station and is un-manned. The site has been permitted to allow operation of two compressor engines site-rated at 1376 horsepower each. Currently, only one of the engines exists at the site. However, compressors may be installed or removed to meet demand. The facility layout is illustrated in Figure 2.

6.0 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.



7.0 TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND WASTE SOLIDS

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and waste water. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

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

Barring facility modification and/or process changes, the classification of non-exempt wastes by laboratory analyses will be made once during the approval period of this plan. Subsequent laboratory analyses will be performed at the generator's discretion (minimum of once every five years), or more frequently to comply with waste acceptance procedures of the disposal facility.

8.0 STORM WATER PLAN

This storm water section was developed to provide a plan to monitor and mitigate impact to storm water runoff from the facility. It serves to satisfy storm water management concerns of the NMOCD. It is not intended to comply with 40 CFR Part 122, Storm Water Discharges as this facility is excluded in 122.26 (c) (1) (iii).

This section concentrates on the identification of potential pollutants, inspection and maintenance of the pollutant controls, and gives a description of structural controls to prevent storm water pollution.

8.1 Site Assessment and Facility Controls

An evaluation of the material used and stored on this site that may be exposed to storm water indicates that no materials would routinely be exposed to precipitation. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms, curbs, or emergency response actions, could flow overland to open off-site drainage ditches (arroyos) and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.



8.2 Best Management Practices

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

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

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

9.0 INSPECTION, MAINTENANCE AND REPORTING

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

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

10.0 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Spill containment berms around above ground storage tanks will be designed to contain 133% of the tank capacity. The below-grade tanks will be constructed with a means of leak detection, and will either be double-walled tanks, double-bottomed tanks or a tank set on an impermeable pad.

Williams corporate policy and procedure for Release Reporting and Pollution Prevention and Control are included in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).



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11.0 SITE CHARACTERISTICS

The Lawson Straddle Compressor Station is located approximately 8.3 miles north-northwest of Aztec, New Mexico in the Farmington Glade. The site elevation is approximately 6300 feet above sea level. The natural ground surface topography slopes downward toward the west. The maximum relief over the site is approximately 11 feet. Site drainage is to the west, approximately 200 feet, to the Lawson Glade.

The area is dissected by numerous washes, originating from the mesas east and west above the Farmington Glade. Intermittent flow from the site would likely follow the Lawson Glade drainage approximately 800 feet southwest to the Farmington Glade.

The nearest downgradient perennial source of surface water is the San Juan River at the southernmost reach of the Farmington Glade. It is located approximately 17 miles from the site, at an elevation of approximately 5240 feet.

A review of the available hydrologic data (1,2) for this area revealed that there are six water wells within a radius of one mile from the location of the Lawson Straddle Compressor Station. The nearest water well was found approximately $\frac{1}{4}$ to $\frac{1}{2}$ mile from the site in the NW/4 NE/4 NW/4 Township 31 North, Range 12 West, Section 1. The limited data available on this well indicated that the depth to water was 51.3 feet in the Nacimiento Formation. The well was located at an elevation of 6284 feet and is reported to be abandoned. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 200-2,000 mg/l.

The table below presents available information provided for each of the six wells.

Township; Range; Section	Quarter ^a	Apx. Distance from Site (mi)	Well #	Use ^b	Well Depth (ft)	Water Bearing Stratifications (ft)	Description	Depth to Water (ft)
32N; 12W; 35	34	0.75-1	SJ 01106	dom	180	90-100	Shale/Mudstone/Siltstone	115
31N; 12W; 01	1211	0.25-0.5	--	--	--	--	Nacimiento Formation	51.3
31N; 12W; 01	433	~1	SJ 01660	dom	320	275-320	Other/Unknown	275
31N; 12W; 01	43	~1	SJ 02034	dom	85	67-70	Sandstone/Gravel/Conglomerate	55
31N; 12W; 01	432	~0.5	SJ 03022	dom	490	400-490	White Sandstone	250
31N; 12W; 01	432	~0.5	SJ 03134	dom	80	20-80	Yellow Sandstone	20

Note a: 1=NW/4; 2=NE/4; 3=SW/4; 4=SE/4

Note b: dom = domestic

The 100-year 24-hour precipitation event at a regional weather station is 2.8 inches. This small amount of rainfall for the area should pose minimal flood hazards. When practical, surface water runoff from the area surrounding the site is to be diverted around the facility into the natural drainage path. Vegetation in the area consists predominantly of sagebrush and native grasses.

References

¹Stone, 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.

²Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2005.



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12.0 FACILITY CLOSURE PLAN

All reasonable and necessary measures will be taken to prevent the exceedence of WCQQ Section 3103 water quality standards should Williams choose to permanently close the facility. Williams 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.

TABLES

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

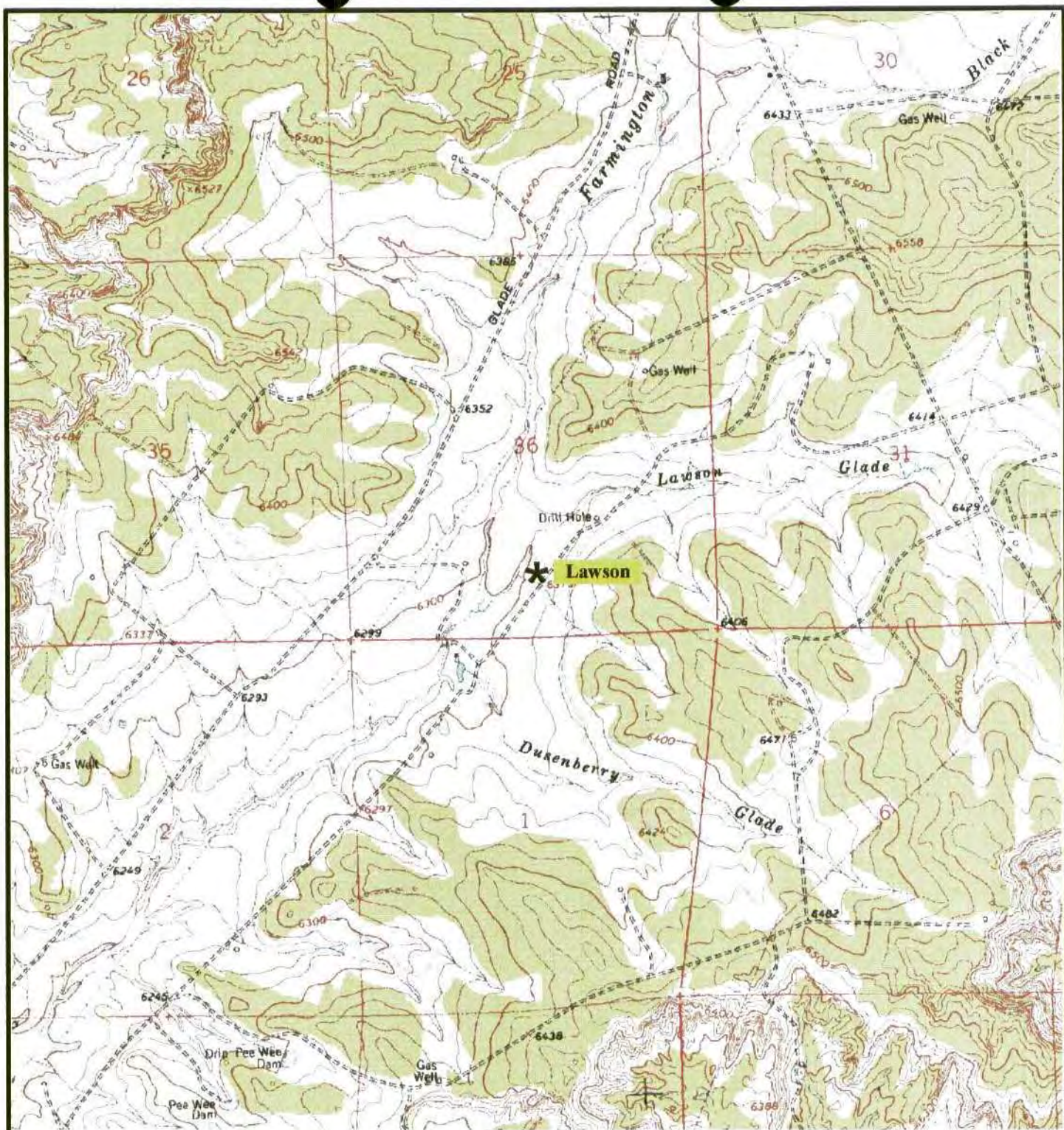
PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	100-500 gallons/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	20-60/year/engine	No Additives
Condensate/Produced Water	Scrubber	200-3000 barrels/year	No Additives
Produced Water	Scrubber	200-3000 barrels/year	May contain trace lube oil
Waste Water	Compressor Skid	500-3000 gallons/year/engine	Biodegradable soap and tap water w/ traces of oil
Used Process Filters	Air	25-100/year	No Additives
Empty Drums/Containers	Liquid Containers	0-20/year	No Additives
Spill Residue (i.e. soil, gravel, etc)	Incident Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incident Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives

TABLE 2
TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS
LAWSON STRADDLE COMPRESSOR STATION

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Hauled upon draining	N/A	Catch basin	Non-exempt	Transported to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Condensate/Produced Water	Above Ground Storage Tank	12,600 gal	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Produced Water	Above Ground Storage Tank	1000 gal	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Waste Water	Above Ground Storage Tank	-a-	Concrete vault	Non-Exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm or transported to a Williams or Contractor facility.	Non -exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Spill Residue (i.e., 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 to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Lube Oil	Above Ground Storage Tank	500 gal tank for each engine	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

a: Tank to be replaced by December 31, 2005

FIGURES



Source: USGS Adobe Downs Ranch, New Mexico Quadrangle

0 2000
Scale (Feet)



Figure 1 Site Vicinity / Topographic Map
Lawson Straddle Compressor Station
 Section 36, Township 32N Range 12W
 San Juan County, New Mexico

APPENDICES

Appendix A
WFS Spill Control Procedures

RELEASE/SPILL REPORTING

MATERIAL SAFETY DATA SHEETS

CHEMICAL EXPOSURES/POISONINGS

Dial

24HRS/DAY - 7DAYS/WEEK

1-888-677-2370

Info you should have when calling:

- **Time of Release/Spill**
- **Location of the Release**
- **Asset where Release Occurred**
- **Amount Released**
- **Name of Chemical or Product Released**



3E COMPANY

1905 Aston Avenue, Carlsbad, CA 92008

Telephone: 760-602-8700

Fax: 760-602-8888

Release/Spill Report Form

Month	<input type="text"/>	Day	<input type="text"/>	Year	<input type="text"/>
Release Verification Time:		<input type="text"/>		Release Stop Time: <input type="text"/>	
Region	<input type="text"/>	District	<input type="text"/>	Area	<input type="text"/>
Location Name		<input type="text"/>		Location Identifier <input type="text"/>	
Mainline Name		<input type="text"/>		Mainline Identifier <input type="text"/>	
Area Manager		<input type="text"/>		Company Asset	<input type="text"/>
Address		<input type="text"/>		County	<input type="text"/>
		<input type="text"/>		Zip Code	<input type="text"/>
Release Discovered by:		<input type="text"/>		Time <input type="text"/>	
Release Reported by:		<input type="text"/>		Time <input type="text"/>	
Section	<input type="text"/>	Township	<input type="text"/>	Range	<input type="text"/>
	<input type="text"/>		<input type="text"/>	Milepost	<input type="text"/>
	<input type="text"/>		<input type="text"/>	Tract #	<input type="text"/>
Offshore	<input type="text"/>	Latitude	<input type="text"/>	Longitude	<input type="text"/>
Release Reportable?		<input type="text"/>		Waterway Affected?	<input type="text"/>
		<input type="text"/>		Name	<input type="text"/>


Report	Date	Number	Time	Name	Title	City	State
NRC <input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
SERC <input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
LEPC <input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
TRRC <input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
EPA <input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Other <input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Product Released:	<input type="text"/>	Total BBL's	<input type="text"/>	Released	<input type="text"/>
Cause of Release:	<input type="text"/>	BBL's Recovered Wat	<input type="text"/>		<input type="text"/>
Released To:	<input type="text"/>	BBL's Recovered Soil	<input type="text"/>		<input type="text"/>
Other:	<input type="text"/>	Total BBL's Recovered	<input type="text"/>		<input type="text"/>
		BBL's Not Recovered	<input type="text"/>		<input type="text"/>

Remarks:

Origin Of Release:

Temperature	<input type="text"/>	Relative Humidity	<input type="text"/>	Precipitation	<input type="text"/>
Cloud Cover	<input type="text"/>	Wind Speed	<input type="text"/>	Wind Direction	<input type="text"/>
Injury	<input type="text"/>	Death	<input type="text"/>	Fire	<input type="text"/>
	<input type="text"/>		<input type="text"/>		<input type="text"/>
Unconsciousness	<input type="text"/>	Hospitalization	<input type="text"/>		
	<input type="text"/>		<input type="text"/>		
Loss/Damage Estimate <input type="text"/>					
Incident Investigator: <input type="text"/>					
Environmental Contact for this Release: <input type="text"/>					
Safety Contact for this Release: <input type="text"/>					
Compliance Administrator for this area: <input type="text"/>					
Form completed by: <input type="text"/>					
Completion Date: <input type="text"/>					
Form was e-mailed to Williams on: <input type="text"/>					

	System Integrity Plan	System Integrity Plan	Document No. 6.04-ADM-002	
		Revision No. 7	Effective Date: 01/01/05	Page: 1 of 10
Procedure: <div style="text-align: center;">RELEASE REPORTING</div>				

1.0 PURPOSE

- 1.1 To define the process for reporting releases and certain other events. The terms "release" and "spill" may be used synonymously within this procedure.

Note 1:

Due to the rigid timeframes for reporting to regulatory agencies (usually within one hour of an event) and the possibility for penalties associated with delayed reporting, **it is imperative that releases and events requiring reporting by this procedure are reported immediately. If you are unsure of the release amount do not delay reporting by attempting to exactly determine the amount. Report immediately with an estimate, and correct later.**

Note 2:

Third parties operating Company facilities (i.e., Hanover / POI) are responsible for reporting in accordance with this procedure.

2.0 PROCEDURE

2.1 Offshore Release Reporting (w/sheen on water)

- 2.1.1 Immediately report to O'Brien's Oil Pollution Services (OOPS) at 985-781-0804, your Environmental Specialist, and the DOT Compliance Coordinator (Tulsa) the following type(s) of offshore release(s):

2.1.1.1 Any release that causes sheen on water.

- 2.1.2 OOPS will immediately make the required telephonic notifications and submit written reports to the appropriate regulatory agencies, the appropriate Qualified Individual (QI), and the Environmental Specialist.

2.2 Offshore Release Reporting (w/o sheen on water)

- 2.2.1 Immediately report to your Environmental Specialist and the DOT Compliance Coordinator (Tulsa) the following type(s) of offshore release(s) or event(s):

2.2.1.1 Any Gas release >50 MSCF;

2.2.1.2 Any event that involves a release of any amount of Gas or Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility **and** a death or personal injury necessitating in-patient hospitalization;

2.2.1.3 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or Hazardous Liquids lost **and/or**, costs of clean up or recovery of the operator **and/or** others \geq \$50,000;

- 2.2.1.4 Any unintentional, non-maintenance related release ≥ 5 gallons of a Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;
- 2.2.1.5 Any release of Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or
- 2.2.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.3.2.1 through 2.3.1.6.
- 2.2.2 The Environmental Specialist and the DOT Compliance Coordinator will determine reportability and, if required, perform telephonic notifications in accordance with applicable regulations.
- 2.2.3 The Environmental Specialist will complete the WES - 35 Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 10 working days.
- 2.2.4 The Environmental Specialist will complete any required follow-up written reports and/or documentation for non-transportation events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.
- 2.2.5 The DOT Compliance Coordinator will complete any required follow-up reports and/or documentation for transportation related events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.

2.3 Onshore Releases

- 2.3.1 Immediately report to 3E Company at 888-677-2370 (toll free) the following type(s) of onshore release(s) or event(s):
 - 2.3.1.1 Any liquid release that enters, or is expected to enter, any waterway (i.e., ditch, arroyo, intermittent stream, etc.);
 - 2.3.1.2 Any individual liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) > 1 gallon;
 - 2.3.1.3 Any cumulative liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) > 5 gallons within a 24-hour period (drips, pinhole leaks, etc.). (NOTE: Report immediately upon determining, or suspecting that the 5 gallon/24 hour threshold will be met or exceeded);
 - 2.3.1.4 Any Gas release > 50 MSCF;
 - 2.3.1.5 Any event that involves a release of any amount of Gas or hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility and a death or personal injury necessitating in-patient hospitalization;

- 2.3.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or hazardous liquids lost and/or, costs of clean up or recovery of the operator **and/or** others \geq \$50,000;
- 2.3.1.7 Any unintentional, non-maintenance related release \geq 5 gallons of a hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;
- 2.3.1.8 Any release of hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or
- 2.3.1.9 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.4.1.1 through 2.4.1.8.
- 2.3.2 3E Company will immediately make the required telephonic notifications in accordance with the Telephonic and Written Release Reporting Requirements.
- 2.3.3 Information that will be needed when reporting to 3E is on WES-35 - Release Report Form.
- 2.3.4 Refer to the Onshore Release/Spill Notification Flowchart for more information regarding the onshore reporting workflow.
- 2.3.5 The Environmental Specialist will follow-up with Operations to verify that adequate response and reporting measures have been taken for each release and track closure of each release report with appropriate regulatory agencies.

Note:**Flares and Thermal Oxidizers**

Flares, thermal oxidizers and other pollution control devices typically have permit limits and conditions and may require tracking of flaring and/or other routine and/or non-routine events. Refer to your facility specific permit conditions. Immediately report any exceedance of permit limits or variance from permit to your Environmental Specialist, whom will notify the appropriate regulatory agency(s).

2.4 Planned / Scheduled Blowdowns

- 2.4.1 Notify your Environmental Specialist as far as possible in advance of planned / scheduled blowdowns that are not an exception per 2.5 of this procedure.
- 2.4.2 Be prepared to provide to your Environmental Specialist a current extended chromatographic analysis of the product to be released.

2.4.3 The Environmental Specialist will:

- 2.4.3.1 Review information provided;
- 2.4.3.2 Notify appropriate agencies;
- 2.4.3.3 Obtain required permits or permissions;
- 2.4.3.4 Provide Operations with any special conditions and / or limitations to be observed before, during, and/or after the planned / scheduled blowdown event; and
- 2.4.3.5 Perform any required post event reporting or follow-up to agencies.

2.5 Exceptions to Procedure:

- 2.5.1 Sheen on rainwater within facilities, dikes, valve boxes, etc.. that is not the result of a release event. However, one must follow proper disposal and housekeeping practices for these cases.
- 2.5.2 Routine releases to pollution control devices (flares, thermal oxidizers, etc.) **in accordance with permit conditions or limitations.**
- 2.5.3 Site-specific procedures may qualify as an exception, if reviewed and approved by your Environmental Specialist.

2.5 Post Report Follow-up (for Remediation and Cost Purposes)

- 2.5.1 Within 45 days of any release that affected soil or water, Operations will submit to the Environmental Specialist the following information:
 - 2.5.1.1 Quantity of soil, water, or product removed as a result of a release;
 - 2.5.1.2 Disposition of soil, water, or product removed (i.e., land, farm, landfill, disposal, etc.);
 - 2.5.1.3 Update of costs incurred because of release. (Includes value of lost product, repair costs response costs, clean up costs, disposal costs, etc.)
 - 2.5.1.4 Environmental Specialist will update release database with additional information from 2.5.1.1 through 2.5.1.3.

2.6 Release Database

- 2.6.1 The Tulsa Release Reporting Compliance Specialist will maintain the release database and update with follow-up information from 2.5.1.1 through 2.5.1.3 above.

3.0 REFERENCES

3.1 Regulatory

3.1.1 Various regulatory requirements at the State and Federal levels require reporting of releases and/or release events.

3.1.2 49 CFR 191, 192 and 195

3.2 Related Policies/Procedures

3.2.1 SIP-ADM-6.04 - Pollution Prevention and Spill Response

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

4.0 DEFINITIONS

4.1 Liquid - For the purposes of these reporting criteria, a substance should be considered a liquid if it is transported or stored in liquid form. Liquid releases should be reported using the measurement unit used when transporting the product (i.e., gallons/barrels).

4.2 Gas - For the purposes of these reporting criteria, a substance should be considered a gas if it is transported or stored in gaseous state. Gas releases should be reported using the measurement unit used when transporting the product (i.e., m.s.c.f.).

4.3 Facility Boundary - The Facility Boundary is the area within the fenced perimeter or the property line. If no fence or clear property line exists, then the facility boundary is that area clearly maintained by Operations (graveled, mowed, cleared, etc.), excluding pipeline rights-of-way.

4.4 Offshore Release - Any release that occurs seaward of the coastline or in an onshore Tidally Affected Zone.

- 4.5 **Onshore Release** - Any release that does not occur offshore in a Tidally Affected Zone.
- 4.6 **Tidally Affected Zone** - Relating to or affected by tides: *the tidal maximum; tidal pools; tidal waters.*
- 4.7 **DOT jurisdictional Pipeline or Pipeline Facility** – Pipeline or pipeline facility subject to 49 CFR Parts 192 or 195.
- 4.8 **Hazardous Liquid** – Per 49 CFR 195.2 - petroleum, petroleum products, or anhydrous ammonia.

➤➤➤End of Procedure<<<


System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
01/20/03		Added link to Onshore Release/Spill Notification Flowchart
	2.0	Deleted Scope
	3.1	Deleted "Certain Company operated assets can be the source of hydrocarbon or other fluid releases or atmospheric releases into the environment. Although we can learn much about our assets and operating practices by tracking <u>all</u> releases, the procedure below has been developed so that the Company can allocate its resources most appropriately. However, every spill situation is different: If there is a realistic risk of exposure to the public, livestock, the soil or ground water, the event and condition must be reported. Proper reporting ensures a proper response. " Added "This procedure applies to liquid and gas releases"
	3.2	Deleted "direct the administration of all Release reporting in their area and provide the following:"
	3.2 bullet	Deleted "Provide reportable release volumes to Operations, as requested, for common routine, intentional, maintenance blow-down events." Deleted "Compile all submitted release data to calculate total release-related associated costs for their area." Rewrote to read "Submit release follow-up information to the applicable regulatory agencies"
	4.1	Added "Liquid releases should be reported using the measurement unit used when transporting the product"
	4.4	Added "A deliberate, controlled release of gaseous or liquid material to the environment"
	5.0	Deleted Responsibilities
	6.1	Added "Onshore"
7/11/03	1.0	Delete "The purpose of this procedure is to provide a standard method for determining what constitutes a", reportable and details instruction on what needs to be done when a reportable release occurs"
7/11/03	2.0	Delete "SCOPE"
	2.1	Deleted "Applies To - all of Williams Energy Services' domestic Midstream/NGL and inland Transportation and Terminal facilities."

	2.2	Deleted "Exceptions - Williams Energy Canada (WEC) Foreign assets, marine terminals, and offshore assets. Marine facilities and offshore assets will report releases in accordance with facility specific Offshore Spill Response Plans and reportable quantities. The Offshore Spill Notification Matrix should also be adhered to. Foreign locations WEC will report releases per their WEC management team's guidelines."
	3.1	Deleted "Certain Company operated assets can be the source of hydrocarbon or other fluid releases or atmospheric releases into the environment. Although we can learn much about our assets and operating practices by tracking all releases, the procedure below has been developed so that the Company can allocate its resources most appropriately. However, every spill situation is different: If there is a realistic risk of exposure to the public, livestock, the soil or ground water, the event and condition must be reported. Proper reporting ensures a proper response." Added "This procedure applies to liquid and gas releases."
	3.2	Deleted "Administration", "direct the administration of all Release reporting in their area and provide the following", "liquid maintenance", "Provide reportable release volumes to Operations, as requested, for common routine intentional maintenance blow-down events", "Compile all submitted release data to calculate total release costs for their area.", "Each Environmental Specialist will communicate to their respective Area the required timeframes for submittal." Added "Submit to the applicable regulatory agencies"
	4.0	Moved "Definitions" to end of document
	5.0	Deleted "Responsibilities" Section
7/11/03	6.1	Added "Offshore Releases - Operations will immediately report all offshore releases to O'Brien Oil Pollution Services (985-781-0804) and to the Environmental Specialist. O'Brien will make the required notifications and reports to the appropriate regulatory agencies in accordance with the (add O'Brien matrix)"
	6.1.1	Added "The Environmental Specialist will complete the WES 35 - Release Report Form and forward to the Compliance Specialist in Tulsa within 5 working days"
	6.2	Deleted "or their designee", "(or within 15 minutes if an ammonia release"
	6.2.1	Deleted "Due to a system/part failure", within a 24 hour period (unless excluded by", "Any non-maintenance release from a pipeline 5 gallons or greater (i.e., seal failure or leaking valve) Added "where the release", "within a 24-hour period"

	6.2.2	Deleted "Sheen on rainwater puddles in a facility (follow proper housekeeping practices)", NOTE – FLARES" "A permitted flare may have permit limits and may require tracking of flaring events Exceedance of permit limits must be immediately reported to your local Environmental Specialist, not to the toll free number", " with the exception of ammonia which must be reported for any release of 20 gallons (100 pounds) or more." Added "Routine", "A permitted flare may have permit limits and may require tracking of flaring events. Exceedance of permit limits must be immediately report to your local Environmental Specialist not to the toll-free number"
	6.2.3	Deleted "can be found at the link provided in Section 7/3. (WES-35 – Release Report Form.xls). (Changed this to a link and changed the title of the link" Added "onshore releases is listed in WES-35 Release Report Form
7/11/03	6.2.4	Deleted "NOTE - RESPONSE MEASURES The Environmental Specialist will contact local Operations to ensure adequate response measures have been taken for each release event and to track closure of each release event wit the appropriate regulatory agencies (if necessary). Added "The third party contractor will notify the appropriate regulatory agencies in accordance with the Release Matrices"
	6.3	Change "90" to "45", "record" to "database" Deleted "(KC filter press, contract disposal, etc.),",
	7.2.1	Added "Pollution Prevention and Spill Response"
	7.3	Added " <u>Release Report Form, WES-35</u> (changed the title of the link)" " <u>Offshore Incident Notification Matrix</u> ", " <u>Onshore Release/Spill Notification Flowchart</u> ", "O'Brien Matrix"
8/22/03	2.2.2	Added "Allow sufficient time for Operations..."
	2.0	Added "Written reports are required..." to Note section
	3.1.7	Deleted "within one hour of occurrence or discovery"
	2.4.7	Added "Some materials, such a ethylene/propylene..."
	2.4.12	Added "Louisiana allows 1.0 MMscf releases without approval or notification..."
	2.5	Added "Compliance Specialist" for maintaining database
9/3/3	3.3.3	Deleted "any release that exists an offshore platform and causes a sheen"

	3.3.3 D	<p>Deleted "MTBE, benzene, 1,3-butadiene"</p> <p>Deleted "Some materials, such as ethylene/propylene have a reduced RQ due to area attainment status (Baton Rouge, Louisiana), verify RQ in pounds when atmospheric releases occur."</p> <p>Added "This threshold may be modified by the ES for specific areas or facilities."</p>
	2.4.11	Deleted "Incidental" (i.e., not from a system/part failure) liquid releases less than 5 gallons of glycol, amine, methanol, condensate or other products, to include releases at truck loading racks"
	2.4.12	Changed to read "Intentional "blowdown" events (i.e., less than 5 bbls of propane/butane mix, or 50 mscf of natural gas. Louisiana allows 1.0 mmscf releases without approval or notification. If quantities are greater than 1.0 mmscf, contact your Environmental Specialist."
	2.5.3	Added "Offshore Releases not involving a sheen – Your area ES."
04/18/04	<p>2.3.1.3 – 2.3.1.7 and 2.4.2.5 – 2.4.2.9;</p> <p>4.0 – Definitions; and 2.4.4</p> <p>Document Header</p> <p>General</p>	<p>Added reporting requirements from 49 CFR 191, 192 & 195;</p> <p>Added 4.6, 4.7 and 4.8; Changed "Title E" to "Tidally";</p> <p>Established link to WES-35 – Release Report Form;</p> <p>Changed "Energy Services" to "System Integrity Plan," changed revision number from 5 to 6 and changed effective date to 04/19/04; and</p> <p>Made miscellaneous obvious corrections.</p>
09/15/04	Entire Document	<p>Reordered and rewritten</p> <p>Added Plans Required of Pipelines/Facilities</p> <p>Clarified that 3E needs to be called as soon as possible and corrections made later.</p>

	System Integrity Plan	Element: Environmental Protection	Document No: 6.04-ADM-001	
		Revision No: 6	Revision Date: 01/01/05	Page: 1 of 8
Procedure: POLLUTION PREVENTION AND CONTROL				

1.0 PURPOSE

- 1.1 To outline the conditions under which facilities are subject to the requirements of the EPA Oil Pollution Prevention program, specify the actions required at facilities to comply with pollution prevention and/or response plans, and to ensure facilities are in compliance with all applicable oil pollution prevention regulations.

2.0 PROCEDURE

- 2.1 At least Annually, perform visual inspections of oil storage tanks and containers (single containers with capacities >55 gallons) for signs of deterioration, discharges or accumulation of oil inside diked areas. Document Inspections on 0019 – External Visual Tank Inspection form.
- 2.2 Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with SIP-ADM-7.15 - Aboveground Storage Tank Integrity
- 2.3 Perform maintenance or repairs necessary to prevent or stop leaks or releases and document the work following company maintenance and repair procedures.
- 2.4 Maintain appropriate spill response equipment at an easily accessible location at the facility and ensure facility personnel are trained on the materials and their use(s).
- 2.5 Routine releases of storm water from containment areas shall be documented on WES-87 – Record of Secondary Containment Discharge. All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
- 2.6 **Facility Pollution Prevention Plans**
- 2.6.1 The oil pollution prevention regulations include two plans related to non-transportation onshore facilities. The most common is the Spill Prevention Control and Countermeasure (SPCC) Plan. The second is the Facility Response Plan (FRP).
- 2.6.1.1 An SPCC Plan is a written document that describes the steps a facility takes to prevent oil spills and to minimize the risk of harm to the environment.
- 2.6.1.2 A Facility Response Plan is a written document that

describes the procedures for responding to a spill.

NOTE

If your facility requires a Facility Response Plan (FRP), it will include an Emergency Response Action Plan (ERAP), which is equivalent to a Williams Emergency Response Plan (ERP). Therefore, if a facility has an FRP, the Environmental Specialist will be responsible for preparation of the ERAP, and a separate ERP (as required by SIP-ADM-12.01 - Emergency Response and Planning) is not required. See 6.04-ADM-003 – Plans Required for Facilities-Pipelines to determine the plans applicable to your facility/pipeline.

- 2.6.2 The Environmental Specialist is responsible for preparation of SPCC plans or FRPs.
- 2.6.3 Operations is responsible for:
 - 2.6.3.1 Reviewing draft plan(s), providing comments to the Environmental Specialist (ES) and meeting published timeframes for reviews and comments
 - 2.6.3.2 Ensuring it is capable of complying with the document upon publication
 - 2.6.3.3 Reviewing the plan(s) Annually and providing revisions or updates to the ES
 - 2.6.3.4 Performing inspections required by the plan(s)
 - 2.6.3.5 Maintaining documentation required by the plan(s) on the appropriate forms
 - 2.6.3.6 Conducting annual drills if an FRP is in-place for the facility
 - 2.6.3.7 Ensuring adequate response contractors are available in the area
 - 2.6.3.8 Providing to the ES a current site survey to allow for secondary containment calculations to be conducted.
- 2.6.4 Requirements to Maintain Records - The facility is required to maintain all inspection logs, secondary containment drainage logs, etc., for a period of 5 years. These records must be maintained in a centralized location at the facility and must be easily accessible to an inspector.
- 2.6.5 Requirements to Maintain the EMIS - The EMIS will be populated with all requirements of the facility's plans (SPCC/FRP) and any associated best management practices. The Environmental Group (ES, and CA) is responsible for maintaining the database.

- 2.6.6 Training Requirements – The Federal regulations for oil pollution prevention require annual training on the facility's plans and an overall education on plan requirements/purpose. Operations is responsible for ensuring all personnel receive the required SPCC/FRP training on an annual basis. This training may be coordinated with the Environmental Specialist as part of the required annual review.

3.0 REFERENCES

3.1 Regulatory

- 3.1.1 Oil Pollution Prevention Act of 1990
- 3.1.2 40 CFR 112, Oil Pollution Prevention (EPA)
- 3.1.3 Applicable state, regional and local regulations

3.2 Related Policies/Procedures

- 3.2.1 Training CD for SPCC Plans
- 3.2.2 SIP-ADM-7.15 - Aboveground Storage Tank Integrity

3.3 Forms and Attachments

- 3.3.1 WES-87 – Record of Secondary Containment Discharge
- 3.3.2 WES-35 - Release Report Form
- 3.3.3 6.04-ADM-002 - Release Reporting
- 3.3.4 6.04-ADM-003 – Plans Required for Facilities-Pipelines
- 3.3.5 0019 – External Visual Tank Inspection
- 3.3.6 SIP-ADM-12.01 - Emergency Response and Planning
- 3.3.7 Spill Prevention Control and Countermeasure (SPCC) Plan
- 3.3.8 Facility Response Plan
- 3.3.9 SIP Feedback/Change Request

4.0 DEFINITIONS

- 4.1 **Aboveground Storage Tank (AST)** – A tank that has all its surfaces above the existing grade so as to allow visual inspection of all the tank surfaces.
- 4.2 **DOT** – Department of Transportation
- 4.3 **EPA** – Environmental Protection Agency

- 4.4 Facility** – Any terminal, facility, pipeline, etc. owned or operated by Williams.
- 4.5 Facility Response Plan** - Required for any non-transportation related facility that could be expected to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines.
- 4.6 MMS** – Minerals Management Service
- 4.7 Navigable Waters** – The Clean Water Act defines the navigable waters of the United States as the following: all navigable waters, as defined in judicial decisions prior to the passage of the Clean Water Act, and tributaries of such waters; interstate waters; intrastate lakes, rivers, and streams that are used by interstate travelers for recreational or other purposes; and intrastate lakes, rivers, and streams from which fish and shellfish are taken and sold in interstate commerce.
- 4.8 Oil** – Oil of any kind or any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. The EPA accepts the definition of oil as the list provided by the USCG at <http://www.uscg.mil/vrp/faq/oil.shtml>.
- 4.9 Oil Pollution Act (OPA) of 1990** – OPA 1990 requires regulated facilities to submit spill response plans that address the facility owner's or operator's ability to respond to a "worst-case discharge." OPA 90 is being implemented by EPA under 40 CFR 112, Oil Pollution Prevention, Section 112.20, Facility Response Plans.
- 4.10 Oil Spill Response Plan** – An Oil Spill Response Plan provides information on responding to a spill at a facility and is intended to satisfy the requirements of the Oil Pollution Act of 1990; Facility Response Plan requirements of 40 CFR 112, Oil Pollution Prevention (EPA); Pipeline Response Plan requirements of 49 CFR 194, Response Plans for Onshore Oil Pipelines (RSPA); Facility Response Plan requirements of 33 CFR 154 Subpart F, Response Plans for Oil Facilities (USCG); and 30 CFR 254, Oil-Spill Response Requirements for Facilities Located Seaward of the Coast Line (MMS).
- 4.11 OSRO** – Oil Spill Response Organization
- 4.12 PREP** – National Preparedness for Response Exercise Program
- 4.13 Release** – synonymous with spill in this document. Williams' definition of a release is contained in the Release Reporting Guidelines which is maintained by the Environmental Group.
- 4.14 RSPA** – Research and Special Programs Administration
- 4.15 Spill Prevention, Countermeasures, and Control (SPCC) Plan** – An SPCC Plan provides information on spill prevention at a facility and is intended to satisfy the requirements of the SPCC Plan requirements in 40 CFR 112, Oil Pollution Prevention.

4.16 Underground Storage Tank (UST) – A tank that has all its surfaces below the existing grade.

4.17 USCG – United States Coast Guard

➤➤➤End of Procedure◀◀◀

System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
9/3/3	2.1.5	Deleted
	2.2.1 B	Added "O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and"
	2.2.2 B	Changed 48-72 to "4 working days"
	2.2.2 C	Changed to "For offshore releases: If the release is not reported to OOPS, the ES will complete the WES Release Report Form and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt. For releases reported to OOPS the ES will not distribute an initial report."
	2.2.3 B	Changed to "For off-shore or marine facility releases: The ES or Compliance Administrator will gather corrections and distribute the final report to all stakeholders via the final distribution list."
	2.3.3	Deleted Marine Facility and is responsible Rewrote to read "The Environmental Specialist is responsible for preparation of SPCC plans or FRP's ."
10/24/03	2.2.4.1	Deleted "Controlled by Area FOA
	2.3.4.3	Deleted "If release is not reported to Oops"
	2.2.4.3	Deleted "for releases reported to Oops, the ES will not distribute an initial report."
	2.2.5.2	Deleted "marine facility"
	2.2.6.1	Deleted "there is no specific timeframe to submit this information."
	2.3.3.1	Deleted "or the SPCC/FRP Program Manager"
	2.3.3.3	Deleted "or the SPCC/FRP Program Manager"
	2.3.5	Deleted "Program Manager" and "Local"
9/15/04	2.1	Deleted for manned facilities Deleted daily facility Deleted for unmanned facilities perform daily inspections. Added Document Inspections on 0018 – Visual External Inspections.
	2.2	New - Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with <u>SIP-ADM-7.15 - Aboveground Storage Tank Integrity</u> Renumbered

	2.5	New Routine releases of storm water from containment areas shall be documented on <u>WES-87 – Record of Secondary Containment Discharge</u> . All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
	2.5	<p>Deleted:</p> <p>When to Initiate</p> <p>2.5.1 The first person to discover a spill/release at a facility will immediately take appropriate action to protect life, and ensure safety of personnel. An attempt will be made to mitigate the effects of the spill by terminating operations, closing valves, or taking other measures to stop the leak or spill as long as personnel are not in danger.</p> <p>2.5.2 For onshore releases: If the spill is reportable (refer to <u>6.04-ADM-002 - Release Reporting procedure</u>), the appropriate person (usually person discovering the release) will immediately notify the 24 hour O&TS release hotline at 1-888-677-2370 and, if necessary, local emergency response personnel/contractors.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center;">NOTE</p> <p>The current 24 hour O&TS release hotline is managed by a contractor, 3E. 3E provides 24-hour service/support, to include reporting major incidents and providing on-demand MSDSs.</p> </div> <p>2.5.3 Offshore releases: If the spill creates a sheen (refer to <u>6.04-ADM-002 - Release Reporting procedure</u>), the appropriate person (usually person discovering the release) will immediately notify O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and the Environmental Specialist or his/her management team.</p> <p>2.5.4 Receiving and reviewing the initial release report</p> <p>2.5.4.1 Onshore releases: Within 24 hours, 3E will distribute an initial release report to the Area. The initial distribution will be made via Area e-mail boxes.</p> <p>2.5.4.2 Each person that receives an initial report is required to review the report for correctness and clarity. All corrections must be provided to 3E in a return e-mail within 4 working days of receipt.</p> <p>2.5.4.3 Offshore releases: The ES will complete the <u>WES-35 - Release Report Form</u> and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt.</p> <p>2.5.5 Receiving a final release report</p>

		<p>2.5.5.1 Onshore releases: 3E will gather the corrections from the initial release report and distribute a final report within 5 days of the release. The final report is sent to a distribution list controlled by Williams.</p> <p>2.5.5.2 Off-shore releases: The ES or Compliance Administrator will gather corrections and distribute the final report to all stakeholders using the appropriate area and final distribution lists.</p> <p>2.5.6 Providing Follow-up Information on the Release</p> <p>2.5.6.1 The Operations Manager or his/her designee shall notify the local Environmental Specialist of the specific response measures taken to respond to the release and all follow-up actions that were taken as a result of the spill or release, if this information was not reported to 3E. It is recommended that the update be provided within 2 workdays of the actions being completed.</p>
	2.6 Note Box	Added See <u>6.04-ADM-003 – Plans Required for Facilities-Pipelines</u> to determine the plans applicable to your facility/pipeline.
	2.6.6	Added This training may be coordinated with the Environmental Specialist as part of the required annual review.
	3.3.4	Added 0018 – Visual External Inspections Renumbered
	4.6	Deleted Hydrocarbons and Other Fluids definition

Appendix B
NMOCD Notification and Corrective Action

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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name of Company	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
-------------	---------	----------	-------	---------------	------------------	---------------	----------------	--------

Latitude _____ Longitude _____

NATURE 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? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

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

* Attach Additional Sheets If Necessary

Appendix C
Public Notice



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

June 8, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

State of New Mexico
State of New Mexico Land Office
Commercial Division
Box 1148
Santa Fe, NM 87504-1148

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Lawson Straddle Compressor Station (GW-322). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during June 2005.

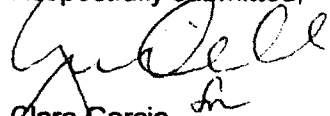
The facility, located in Section 36, Township 32 North, Range 12 West, San Juan County, New Mexico, approximately 8.3 miles north-northwest of Aztec, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be greater than 20 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

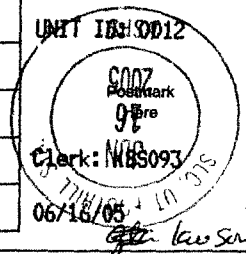
Comments or inquiries regarding this permit or the permitting process may be directed to:

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

Respectfully submitted,


Clara Garcia
Environmental Compliance Administrator

5005 0390 0005 7906 7965

U.S. Postal Service TM		
CERTIFIED MAIL TM RECEIPT		
(Domestic Mail Only; No Insurance Coverage Provided)		
For delivery information visit our website at www.usps.com		
OFFICIAL USE		
Postage	\$ 0.37	
Certified Fee	2.30	
Return Receipt Fee (Endorsement Required)	1.75	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 4.42	
Sent To: State of NM Land & C - Comm Div		
Street, Apt. No., or PO Box No. Box 1148		
City, State, ZIP+4 Santa Fe, NM 87504		

PUBLIC NOTICE

Notice of Discharge Plan Renewal Application

Lawson Straddle Compressor Station

Pursuant to the requirements of the New Mexico Water Quality Control Commission Regulation 20 NMAC 2.6.2 – GROUND AND SURFACE WATER PROTECTION, Williams Field Services Company of 188 County Road 4900, Bloomfield, NM 87413, hereby announces intent to apply to the New Mexico Oil Conservation Division to renew the Discharge Plan for the Lawson Straddle Compressor Station. Williams expects to submit the permit application to the Oil Conservation Division in June 2005.

The facility, located in Section 36, Township 32 North, Range 12 West, San Juan County, New Mexico, approximately 8.3 miles north-northwest of Aztec, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be greater than 20 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

Director of the Oil Conservation Division
1220 South Saint Francis Dr.
Santa Fe NM 87505
(505) 827-1464

Please refer to the company name and site name, as used in this notice, or send a copy of this notice when making inquiries, since the Department might not have received the application at the time of this notice.

NOTA PUBLICA

La nota de la Aplicación de la Renovación del Plan de la Descarga

Estacion de Compresor de Lawson

Según los requisitos de la Regulación de la Comisión de Control de calidad de Agua de nuevo México 20 2.6.2 de NMAC – el SUELO Y la PROTECCION de AGUA de SUPERFICIE, William Field Services 188 County Road 4900 , Bloomfield, NM 87413, por la presente anuncian la intención para aplicar a la División de la Conservación del Petróleo de nuevo México para renovar el Plan de la Descarga para el Lawson Cabalga la Estación de Compresor. William esperan someterse la aplicación del permiso a la División de la Conservación del Petróleo en junio 2005.

La facilidad, localizado en la Sección 36, Municipio 32 al norte, la Gama 12 al oeste, San Condado de Juan, nuevo México, aproximadamente 8,3 del norte-noroeste de millas de azteca, proporciona gas natural la compresión y condicionar los servicios. Las direcciones del permiso de la descarga cómo rocian, los escapes, y otras descargas accidentales a la superficie se manejarán. La facilidad no descarga wastewater para surgir ni aguas subterráneas. Todo malgasta engendrado será almacenado temporalmente en tanques o contenedores. El desecho envió offsite se dispondrá o será reciclado en un OCD aprobó el sitio. En caso de una descarga accidental, molió agua muy probable no se afectará. La profundidad estimada de la agua del suelo en el sitio se espera ser más que 20 pies. El suma se disolvió la concentración de sólidos de agua de suelo de área se espera estar en la gama de partes de 200-2,000 por millón.

Los comentarios o las indagaciones con respecto a este permiso o el proceso que permiten puede ser dirigido a:

Director of the Oil Conservation Division
1220 South Saint Francis Dr.
Santa Fe NM 87505
(505) 827-1464

Refiérase por favor al nombre de la compañía y el nombre del sitio, como utilizado en esta nota, o mande una copia de esta nota al hacer las indagaciones, desde que el Departamento no podría haber recibido la aplicación en el tiempo de esta nota.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

April 4, 2005

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

Ms. Clara Garcia
Williams Field Services Company
188 CR 4900
Bloomfield, New Mexico 87413

RE: Discharge Permit Renewal Notice for Williams Field Services Facilities

Dear Ms. Garcia:

Williams Field Services has the following discharge permits that expire on the dates shown below.

GW-187 expires 6/6/2005 – La Cosa Compressor Station
GW-322 expires 6/27/2005 – Lawson Compressor Station
GW-323 expires 6/27/2005 – Horton Compressor Station
GW-320 expires 6/27/2005 – Richardson Saddle Compressor Station
GW-321 expires 6/27/2005 – Glade Compressor Station
GW-198 expires 7/31/2005 - 29-6 #3 CDP Compressor Station

WQCC 3106.F. If the holder of an approved discharge permit submits an application for discharge permit renewal at least 120 days before the discharge permit expires, and the discharger is not in violation of the approved discharge permit on the date of its expiration, then the existing approved discharge permit for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge permit continued under this provision remains fully effective and enforceable. An application for discharge permit renewal must include and adequately address all of the information necessary for evaluation of a new discharge permit. 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]

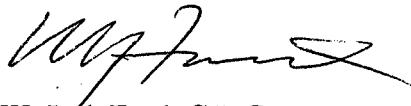
The discharge permit renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit renewal will be assessed a fee equal to the filing fee of \$100.00 plus a flat fee dependent upon horsepower rating for or type of gas processing facilities. The \$100.00 filing fee is submitted with the discharge permit renewal applications and is nonrefundable.

Ms. Clara Garcia
Williams Field Services Company
April 4, 2005
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 permit 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 permit renewal request.** (Copies of the WQCC regulations and discharge permit application form and guidelines are available on OCD's website at www.emnrd.state.nm.us/oed/).

If any of the above facilities no longer has any actual or potential discharges and a discharge permit is not needed, please notify this office. If the Duke Energy Field Services has any questions, please do not hesitate to contact me at (505) 476-3489.

Sincerely,



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

cc: OCD Artesia District Office

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 7-19-00,
or cash received on _____ in the amount of \$ 3,450.00

from Williams Field Services Company

for La Cosa C.S. Glade C.S. GW-187, GW-320,
Richardson Straddle C.S. Lawson C.S. Horton C.S. GW-321, GW-322, GW-723

Submitted by: [Signature] Date: 7-26-00

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility 4 Renewal 1 Renewal

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____

THIS MULTI-TONE 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 BACK.



WILLIAMS FIELD SERVICES COMPANY
1800 South Baltimore Avenue * P.O. Box 645 * Tulsa, OK 74101-0645

70-2322 / 719
A/C 9401076

DATE: 07/19/2000

PAY TO THE ORDER OF:

PAY → *****\$3,450.00

NEW MEXICO OIL CONSERVATION DI
NM WATER QUALITY MGMT FUND
2040 S PACHECO

SANTA FE
United States

NM 87504

Bank One, NA
Illinois

[Signature]

Authorized Signer

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 plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-320) - Williams Field Services, Inc., Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84108-0900, has submitted a discharge plan application for their Richardson Straddle compressor station located in the SW/4 NE/4, Section 27, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 115 gallons per day of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 110 to 180 feet with a total dissolved solids concentrations ranging from approximately 450 mg/l to 2400 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-321) - Williams Field Services, Inc., Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Glade compressor station located in the NW/4 SW/4, Section 30, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 58 gallons per day of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 94 feet with a total dissolved solids con-

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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 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 or its modification, 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 to him 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 based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of April, 2000.

**STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
LORI WROTENBERY,
Director**

Legal #67299
Pub. April 27, 2000

AFFIDAVIT OF PUBLICATION

Ad No. 42724

STATE OF NEW MEXICO County of San Juan:

ALETHIA ROTHLSBERGER, being duly sworn says: That she is the Classified 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 meeting of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Sunday, April 30, 2000

And the cost of the publication is: \$147.00

Alethia Rothlsberger

On 5/4/2000 ALETHIA ROTHLSBERGER appeared before me, whom I know personally to be the person who signed the above document.

Nancy L. Seade
My Commission Expires April 10, 2004

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

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A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information provided.

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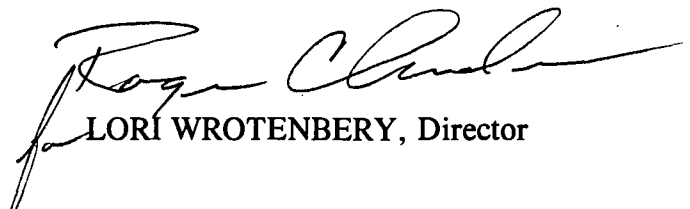
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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 24th day of April, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

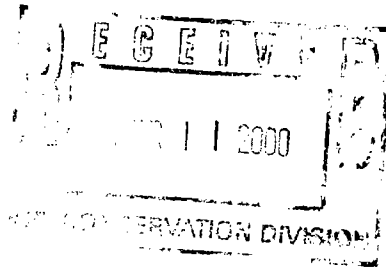


LORI WROTENBERY, Director

SEAL



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



March 31, 2000

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

Re: Discharge Plan Application and Filing Fee for various WFS Compressor Stations


Dear Ms. Wrotenbery:

Enclosed please find copies of Discharge Plan applications and check number 1000079599 for \$200.00 to cover the filing fee for the following Williams Field Services (WFS) Compressor Stations:

- Richardson Straddle Compressor Station, San Juan County, New Mexico - *GW-320*
- Glade Compressor Station, San Juan County, New Mexico - *GW-321*
- ☒ Lawson Compressor Station, San Juan County, New Mexico - *GW-322*
- Horton Compressor Station, San Juan County, New Mexico - *GW-323*

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

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 4/5/00,
or cash received on _____ in the amount of \$ 200.00
from Williams Field Services
Richard Straddle C.S. - GW-320
for Glade C.S. - GW-321
Lawson C.S. - GW-322
Horton C.S. (Farming House) GW-323
Submitted by: WJ Ford Date: 4/11/00
Submitted to ASD by: _____ Date: _____
Received in ASD by: _____ Date: _____
Filing Fee ☒ New Facility _____ Renewal _____
Modification _____ Other _____
Organization Code 521.07 Applicable FY 2000

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____

THIS MULTI-TONE 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 BACK.

Williams
WILLIAMS GAS PROCESSING AS AGENT FOR BLANCO
1800 South Baltimore Avenue * P.O. Box 645 * Tulsa, OK 74101-0645

DATE: 04/05/2000

PAY TO THE ORDER OF:

NEW MEXICO OIL CONSERVATION DI
NM WATER QUALITY MGMT FUND
2040 S PACHECO

SANTA FE
United States
Bank One, NA
Illinois

NM 87504

PAY → *****\$200.00

Mark Langshell
Authorized Signer

INVOICE NUMBER		INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
03-APR-00		20000403	0009148-TUL040004010		200.00
				1/4 th	
CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME		TOTAL AMOUNT
	04/05/2000	40665	NEW MEXICO OIL CONSERVATION DI		\$200.00

DISCHARGE PLAN

TORRE ALTA GATHERING SYSTEM
LAWSON STRADDLE COMPRESSOR STATION

GW-322

Williams Field Services Company

March 2000

Table of Contents

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List of Figures - All figures follow Section XI

Figure 1 - Site Location Map
Figure 2 - Site Survey Plan
Figure 3 - Facility Plot Plan

List of Appendices

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 Lawson Straddle 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) Kutz Plant.

II. LEGALLY RESPONSIBLE PARTY

Williams Field Services
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 Lawson Straddle Compressor Station will be located in the ~~SE/4-SW/4 of Section 36, Township 32 North, Range 12 West, in San Juan County, New Mexico,~~ approximately 8 miles northwest of Aztec, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangle: Adobe Downs Ranch, New Mexico) as Figure 1. The site for this station is 1 acre. 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:

~~State of New Mexico~~
State of New Mexico
New Mexico State Land Office
Commercial Division
Box 1148
Santa Fe, NM 87504-1148

V. FACILITY DESCRIPTION

Construction of the facility and installation of up to two Waukesha 7042GL lean burn engines (site ~~rated at a maximum of 13.76 HP each~~) is anticipated to begin in the first quarter of 2000. Facility startup is anticipated for the second quarter 2000. The units 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.

<u>Sample</u>	<u>Parameters</u>
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
LAWSON STRADDLE COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	QUANTITY (estimate)	QUALITY
Used Oil	Compressor	1200 gal/yr/engine	Used motor oil w/no additives
Natural Gas Condensate/Produced water	Scrubber, Gas Inlet Separator	3000 bbl/yr	No additives
Waste Water	Drawn of Natural Gas Condensate Tank	500 bbl/yr	No additives <i>15 gal/day</i>
Wash-down Water	Compressor Skid	700 gal/yr/engine <i>2x700 =</i>	Soap and tap water w/traces of used oil <i>± 4 gal/day</i>
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. TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND 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.

TABLE 2
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
LAWSON STRADDLE 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	300 bbl	Berm and liner	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Waste Water	Drawn off condensate tank	Above ground storage tank	720 gal <i>3000 gal</i>	Berm and liner	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	320 gal	Metal water trough set in concrete containment	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	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.
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	Day tank adjacent to each engine	500 gallons	Berm	Non-exempt	May be hauled to WFS or POI consolidation point before transport to EPA-registered used oil marketer for recycling.

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 an 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 remotely monitored for equipment malfunctions through Gas Dispatch and the WFS Torre Alta District. POI must comply with Williams' spill response procedures.

Environmental Protection will be a contractual obligation as follows:

Pollution/Hazardous Waste: POI shall take all necessary precautions to control pollution of any kind resulting from 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 and will be equipped with an impermeable liner. The below-grade tanks will be constructed with a means of leak detection, and will either be double-bottomed tanks or a tank set on an impermeable pad.

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 Lawson Straddle Compressor Station is located approximately 8 miles northwest of Aztec, New Mexico in the Farmington Glade. The site elevation is approximately 6,300 feet above mean sea level. The natural ground surface topography slopes downward toward the south-southwest. The maximum relief over the site is approximately 11 feet.

The area is dissected by numerous washes, originating from the mesas east and west above the Farmington Glade. Intermittent flow from the site will follow the Farmington Glade drainage towards the southwest. The site is located approximately 9 miles east of the La Plata River. The La Plata River, at approximately 5800 feet in elevation, is the nearest down gradient perennial source of surface water to the site.

A review of the available hydrologic data^{1,2} for this area revealed that there are two water wells within a radius of one mile from the location of the Lawson Straddle Compressor Station. The nearest water well was found approximately 1/2 mile south of the site in the NW/4 NE/4 NW/4 NW/4 Township 31 North, Range 12 West, Section 1. The limited data available on this well indicated that the well was drilled to a depth of 513 feet and is abandoned. The well was located at an elevation of 6284 feet in the Nacimiento Formation. Another well was located slightly more than 1/2 mile west of the site in the SW/4 SE/4 Township 32 North, Range 12 West, Section 35. The data available indicated that this domestic/stock well was drilled to a depth of 180 feet. The well was perforated between 110 and 180 feet below the ground surface, in an un-designated formation. Additionally, slightly more than 1/2 mile south of the site, in the SE/4 and the SW/4 of Section 1, data indicated two domestic wells drilled to depths of 220 feet and 320 feet below ground surface, respectively. No other information describing these wells was available. *GW Quality?*

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

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

References

¹Stone, 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.

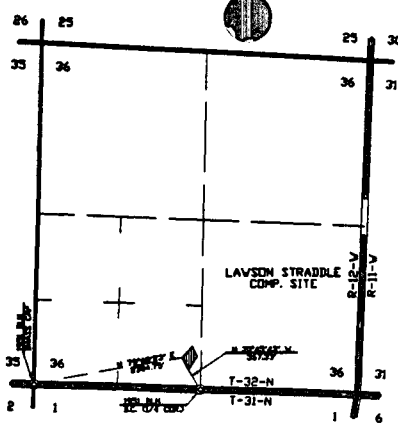
ADDBE DOWNS RANCH, NM BLAD



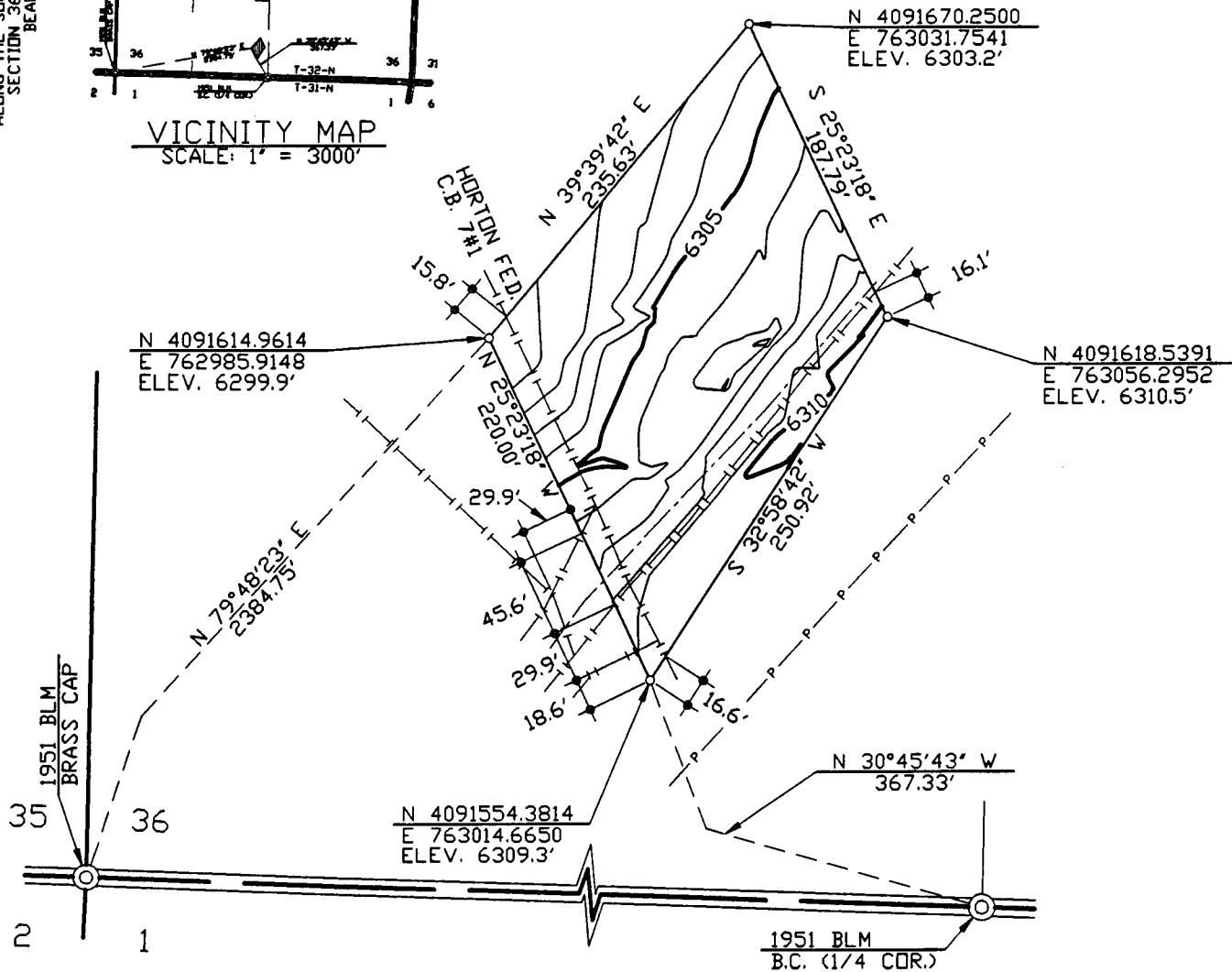
FIGURE 2

LAWSON STRADDLE COMPRESSOR SITE 1.000 ACRES

NOTE: BEARINGS ARE BASED ON A GRID BEARING
ALONG THE SOUTH LINE OF THE SV1/4 OF
SECTION 36, T-32-N, R-12-W, NMPM
BEARS: S 87°59'18" E



VICINITY MAP
SCALE: 1" = 3000'



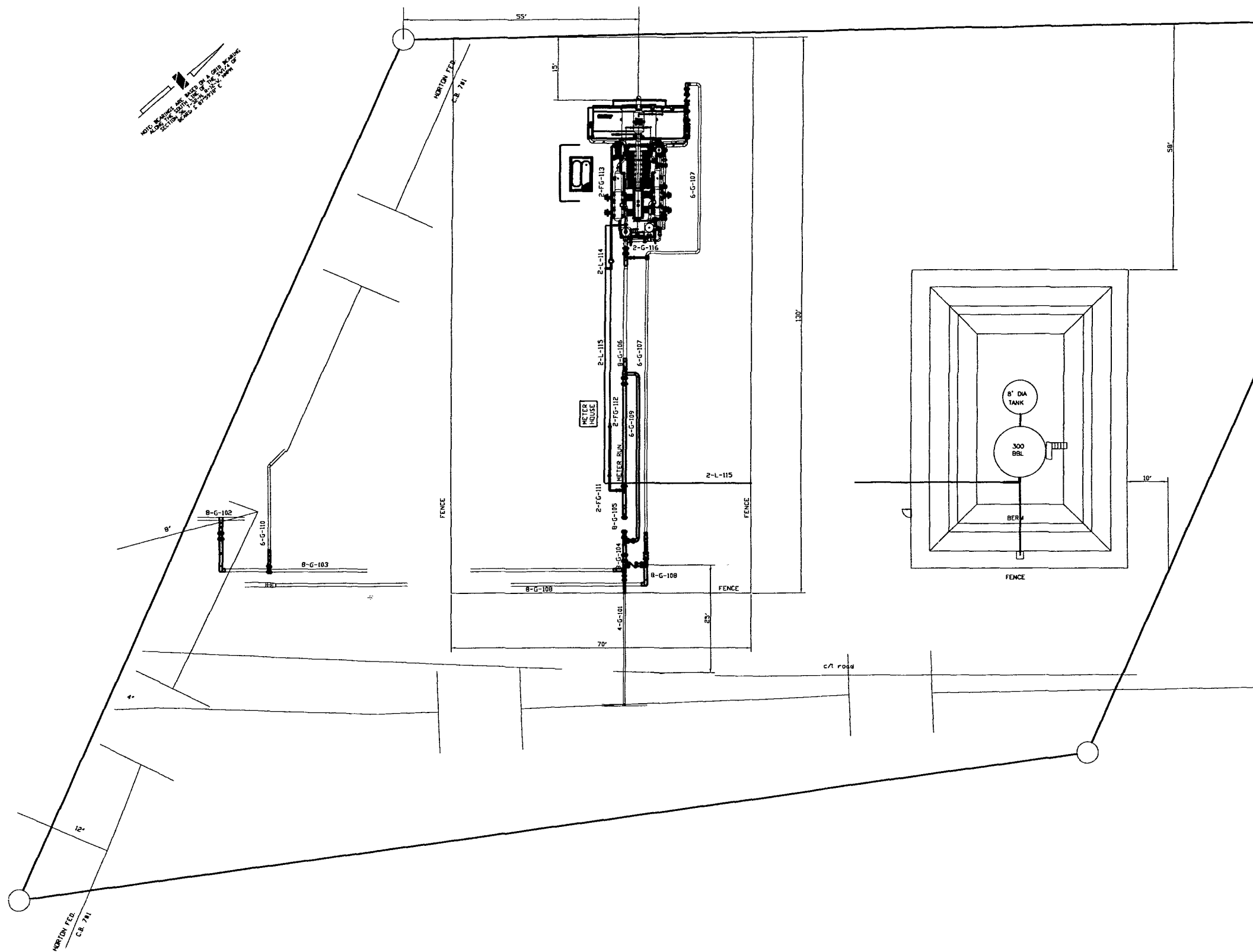
DETAIL
SCALE 1" = 100'

NOTES

1. ALL COORDINATES AS SHOWN ARE DERIVED FROM U.S.G.S. QUAD MAP. UTM COORDINATES, ZONE 12, IN METERS.
2. ° DENOTES SET 5/8" REBAR
3. TBM IS TOP OF DOG LEG 46.70' N 73°22'07" W OF SOUTH CORNER OF SITE. ELEV.: 6311.0'


REVISION	1	5/14/98	JDB	ISSUED FOR REVIEW	W.D.N.D.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	W.D.N.D.	CHK.	APP.
NO.	DATE	BY	DESCRIPTION	W.D.N.D.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	W.D.N.D.	CHK.	APP.	
INFO				DRAFTING		BY		DATE		STATE: NEW MEXICO		WILLIAMS GAS PROCESSING - BLANCO		
SURVEYED: 4/17/98				DRAWN BY		JDB		5/14/98		LOCATION: SAN JUAN		ONE OF THE WILLIAMS COMPANIES		
R/W #: 03575				CHECKED BY		FAD		5/14/98		TORRE ALTA GATHERING SYSTEM LAWSON STRADDLE COMPRESSOR SITE SECTION 36, T-32-N, R-12-W, NMPM		DWG NO. 799.9-X-17		
OWNERSHIP:				APPROVED BY		RR		5/16/98						
STATE OF				ENGINEER		BY		DATE						
NEW MEXICO				DESIGNED BY				SCALE: AS NOTED		W.D. NO.		SHEET 1 OF 1		
PROJ. APPROVED				RP		4/12/98						REV 1		

FIGURE 3



NOTES:

1. ALL UNDERGROUND 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 WILL BE INSTALLED BY OTHERS. THE CONTRACTOR WILL PROVIDE MATERIALS FOR AND INSTALLATION OF THE HOG WIRE FENCE SURROUNDING THE CONDENSATE TANK SYSTEM.
10. THE COMPRESSOR WILL BE SET ON A PORTABLE CONCRETE PAD PROVIDED BY THE COMPANY. THE CONTRACTOR SHALL OVER EXCAVATE TO 2'-0" BELOW THE CONCRETE PAD BOTTOM AND 2'-0" BEYOND PAD EDGES. RECOMPACT PAD SOIL TO 95% PROCTOR DENSITY. THE PORTABLE PAD SHALL BE INSTALLED SUCH THAT INSTALLED PAD IS 6" ABOVE GRADE.
11. SITE WILL REQUIRE CONTOURING BY CONTRACTOR.

DESIGN DATA			HYDROTEST REQUIREMENTS			MINIMUM X-RAY REQUIREMENTS		
CLASS:	3		1110 PSIG MIN. - 1210 PSIG MAX.			100% - 3" AND ABOVE		
FACTOR:	0.5							
MAWP:	720 PSIG		4 HR. DURATION					
WARNING: ABOVE REQUIREMENTS BASED ON NEW CONSTRUCTION, GRADE B MATERIAL. MINIMUM PIPE WALL THICKNESS STATED IN GATHERING FACILITY DESIGN STATEMENT, AND WFS QW1/CW1 OBSERVING ACTUAL WELDING ANY VARIANCE MAY ALTER ABOVE REQUIREMENTS.								
DRAFTING			BY	DATE	STATE: NEW MEXICO	WILLIAMS FIELD SERVICES ONE OF THE WILLIAMS COMPANIES 		
DRAWN BY			RJB	12/3/99	LOCATION: SAN JUAN			
CHECKED BY			RJP	12/3/99	TORRE ALTA GATHERING SYSTEM LAWSON STRADDLE COMPRESSOR STATION SEC.36, T-32-N, R-12-W, NMPM SAN JUAN COUNTY, NEW MEXICO			
APPROVED BY								
ENGINEER			BY	DATE				
DESIGNED BY					SCALE: NTS			
PROJ. APPROVED					W.O. NO. 15092	DWG NO. LAW-1-P1		
						SHEET 1 OF 1		

A

APPENDIX A
WASTE ANALYSIS

Enseco Incorporated

CEDAR HILL C.D.P.
WASTE OIL +
WASTEWATER



ANALYTICAL RESULTS

FOR

NORTHWEST PIPELINE CORPORATION

ENSECO-RMAL NO. 024601

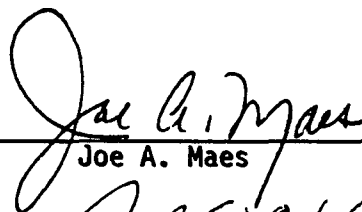
SEPTEMBER 21, 1992

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

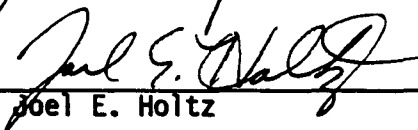


SEPTEMBER 21, 1992

Reviewed by:



Joe A. Maes



Joel E. Holtz

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



AMERICAN
WEST
ANALYTICAL
LABORATORIES

ORGANIC ANALYSIS REPORT

Client: Williams Field Services

Date Sampled: July 19, 1995

Date Received: July 20, 1995

Contact: Mark Harvey

Date Analyzed: July 26, 1995

Analysis Requested:

Volatile Aromatics

Total Purgeable Hydrocarbons

Method Ref. Number:

SW-846 #8260

(Purge & Trap GC/MS)

Field Sample ID:

SAN JUAN AREA

CEDAR HILL #1

Lab Sample ID:

L23218-8

463 West 3600 South
Salt Lake City, Utah
84115

Analytical Results

BTX/TPH-P

Units = mg/L(ppm)

Compound:

Detection
Limit:

Amount
Detected:

Benzene

0.020

0.036

(801) 263-8686

Toluene

0.020

0.046

Fax (801) 263-8687

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:

John L. Hume
Laboratory Supervisor

Report Date: July 31, 1995

1 of 1



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

INORGANIC ANALYSIS REPORT

Analytical Results

463 West 3600 South
Salt Lake City, Utah
84115

(801) 263-8686
Fax (801) 263-8687

	Method Used:	Detection Limit: mg/L	Amount Detected: mg/L
TOTAL METALS			
Arsenic	7060	0.005	<0.005
Barium	6010	0.002	2.8
Cadmium	6010	0.004	0.013
Chromium	6010	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	150.1	0.1	6.8
TDS	160.1	1.0	3,600.
TOX	9020	0.5	1.6

Released by:

Laboratory Supervisor

Report Date 8/2/95

1 of 1

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.

SAMPLE DESCRIPTION INFORMATION
for
Northwest Pipeline Corporation

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

ANALYTICAL TEST REQUESTS
for
Northwest Pipeline Corporation

Lab ID: 024601	Group Code	Analysis Description	Custom Test?
0001	A	pH	N
		Total Dissolved Solids (TDS)	N
		ICP Metals (Total)	Y
		Prep - Total Metals, ICP	N
		Total Organic Halogen (TOX)	N
		Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)	N
		Arsenic, Furnace AA (Total)	N
		Prep - Total Metals, Furnace AA	N
		Lead, Furnace AA (Total)	N
		Mercury, Cold Vapor AA (Total)	N
		Prep - Mercury, Cold Vapor AA (Total)	N
0002	B	Arsenic, Furnace AA	N
		Prep - Total Metals, Furnace AA	N
		ICP Suite	Y
		Prep - Total Metals, ICP	N
		Lead, Furnace AA	N
		Total Organic Halogen (TOX)	N
0003	C	Ignitability, Closed Cup	N
		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.

Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)



Method 8020

Client Name: Northwest Pipeline Corporation
Client ID: CEDAR HILL CDP WASTE WATER TANK
Lab ID: 024601-0001-SA
Matrix: AQUEOUS
Authorized: 19 AUG 92

Sampled: 18 AUG 92
Prepared: NA

Received: 19 AUG 92
Analyzed: 22 AUG 92

Parameter	Result	Units	Reporting Limit
Benzene	19	ug/L	1.2
Toluene	63	ug/L	1.2
Ethylbenzene	12	ug/L	1.2
Xylenes (total)	240	ug/L	1.2
Surrogate	Recovery		
a,a,a-Trifluorotoluene	112	%	

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: Northwest Pipeline Corporation

Client ID: TRIP BLANK

Lab ID: 024601-0003-TB

Matrix: AQUEOUS

Authorized: 19 AUG 92

Sampled: Unknown

Prepared: NA

Received: 19 AUG 92

Analyzed: 24 AUG 92

Parameter	Result	Units	Reporting Limit
Benzene	ND	ug/L	0.50
Toluene	ND	ug/L	0.50
Ethylbenzene	ND	ug/L	0.50
Xylenes (total)	ND	ug/L	0.50
Surrogate	Recovery		
a,a,a-Trifluorotoluene	106	%	

ND - Not detected
NA - Not applicable

Reported By: Steve Shurgot

Approved By: Stan Dunlavy

Metals

Total Metals

Client Name: Northwest Pipeline Corporation
 Client ID: CEDAR HILL CDP WASTE WATER TANK
 Lab ID: 024601-0001-SA
 Matrix: AQUEOUS
 Authorized: 19 AUG 92

Sampled: 18 AUG 92
 Prepared: See Below

Received: 19 AUG 92
 Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic	ND	mg/L	0.0050	7060	10 SEP 92	12 SEP 92
Barium	0.11	mg/L	0.010	6010	10 SEP 92	15 SEP 92
Cadmium	ND	mg/L	0.0050	6010	10 SEP 92	15 SEP 92 B
Chromium	0.15	mg/L	0.010	6010	10 SEP 92	15 SEP 92
Lead	0.020	mg/L	0.010	7421	10 SEP 92	11 SEP 92
Mercury	ND	mg/L	0.00020	7470	13 SEP 92	13 SEP 92

Note B : Compound is also detected in the blank.

ND = Not detected
 NA = Not applicable

Reported By: Jeff Malecha

Approved By: Sandra Jones

Metals

Total Metals

Client Name: Northwest Pipeline Corporation
 Client ID: WASTE OIL TANK CEDAR HILL
 Lab ID: 024601-0002-SA
 Matrix: WASTE
 Authorized: 19 AUG 92

Sampled: 18 AUG 92
 Prepared: See Below

Received: 19 AUG 92
 Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic	ND	mg/kg	1.0	7060	14 SEP 92	16 SEP 92
Cadmium	ND	mg/kg	0.50	6010	14 SEP 92	15 SEP 92
Chromium	1.0	mg/kg	1.0	6010	14 SEP 92	15 SEP 92
Lead	2.8	mg/kg	2.2	7421	14 SEP 92	14 SEP 92

ND - Not detected
 NA - Not applicable

Reported By: Bob Reilly

Approved By: Sandra Jones

General Inorganics

Client Name: Northwest Pipeline Corporation
Client ID: CEDAR HILL CDP WASTE WATER TANK
Lab ID: 024601-0001-SA
Matrix: AQUEOUS
Authorized: 19 AUG 92

Sampled: 18 AUG 92
Prepared: See Below

Received: 19 AUG 92
Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
pH	4.9	units	--	9040	NA	19 AUG 92
Total Organic Halogen as Cl	71.4	ug/L	30.0	9020	NA	10 SEP 92
Total Dissolved Solids	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

General Inorganics



Client Name: Northwest Pipeline Corporation

Client ID: WASTE OIL TANK CEDAR HILL

Lab ID: 024601-0002-SA

Matrix: WASTE

Authorized: 19 AUG 92

Sampled: 18 AUG 92

Prepared: See Below

Received: 19 AUG 92

Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Ignitability	>160	deg. F	--	1010	NA	03 SEP 92 o
Total Organic Halogen as Cl	ND	mg/kg	3.0	9020	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

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
- 2) 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.

$$\% \text{ Recovery} = \frac{\text{Measured Concentration}}{\text{Actual Concentration}} \times 100$$

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

$$\text{RPD} = \frac{|\text{Measured Concentration DCS1} - \text{Measured Concentration DCS2}|}{(\text{Measured Concentration DCS1} + \text{Measured Concentration DCS2})/2} \times 100$$

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.

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

DUPLICATE CONTROL SAMPLE REPORT
Organics by Chromatography

Analyte	Spiked	Concentration		Measured	AVG	Accuracy		Precision
		DCS1	DCS2			Average(%)	Limits	(RPD)
						DCS		DCS Limit
Category: 602-A								
Matrix: AQUEOUS								
QC Lot: 18 AUG 92-1H								
Concentration Units: ug/L								
Benzene	5.0	5.28	5.29	5.28	106	72-112	0.2	10
Toluene	5.0	4.99	5.01	5.00	100	74-109	0.4	10
Ethylbenzene	5.0	4.85	4.89	4.87	97	76-105	0.8	10
Xylenes (total)	5.0	4.82	4.88	4.85	97	74-111	1.2	10
1,3-Dichlorobenzene	5.0	4.83	4.94	4.88	98	72-121	2.3	15

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

SINGLE CONTROL SAMPLE REPORT
Organics by Chromatography

Analyte	Concentration		Accuracy(%)	
	Spiked	Measured	SCS	Limits

Category: 602-A

Matrix: AQUEOUS

QC Lot: 18 AUG 92-1H QC Run: 22 AUG 92-1H

Concentration Units: ug/L

a,a,a-Trifluorotoluene	30.0	31.2	104	90-113
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Category: 602-A

Matrix: AQUEOUS

QC Lot: 18 AUG 92-1H QC Run: 24 AUG 92-1H

Concentration Units: ug/L

a,a,a-Trifluorotoluene	30.0	30.9	103	90-113
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Calculations are performed before rounding to avoid round-off errors in calculated results.

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	ND	ug/L	0.50
Toluene	ND	ug/L	0.50
Ethylbenzene	ND	ug/L	0.50
Xylenes (total)	ND	ug/L	0.50

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

QC LOT ASSIGNMENT REPORT
Metals Analysis and Preparation

Laboratory Sample Number	QC Matrix	QC Category	QC Lot Number (DCS)	QC Run Number (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

DUPLICATE CONTROL SAMPLE REPORT
Metals Analysis and Preparation

Analyte	Concentration			AVG	Accuracy Average(%)		Precision (RPD)	
	Spiked	DCS1	Measured DCS2		DCS	Limits	DCS	Limit
Category: ICP-AT								
Matrix: AQUEOUS								
QC Lot: 10 SEP 92-1A								
Concentration Units: mg/L								
Aluminum	2.0	2.03	2.04	2.03	102	75-125	0.2	20
Antimony	0.5	0.510	0.499	0.505	101	75-125	2.2	20
Arsenic	0.5	0.480	0.453	0.467	93	75-125	5.7	20
Barium	2.0	1.92	1.93	1.92	96	75-125	0.4	20
Beryllium	0.05	0.0500	0.0497	0.0498	100	75-125	0.6	20
Cadmium	0.05	0.0468	0.0442	0.0455	91	75-125	5.7	20
Calcium	100	103	102	103	103	75-125	1.0	20
Chromium	0.2	0.190	0.195	0.192	96	75-125	2.6	20
Cobalt	0.5	0.471	0.467	0.469	94	75-125	0.9	20
Copper	0.25	0.281	0.269	0.275	110	75-125	4.4	20
Iron	1.0	1.01	1.00	1.01	101	75-125	1.0	20
Lead	0.5	0.472	0.475	0.473	95	75-125	0.7	20
Magnesium	50	51.1	50.6	50.8	102	75-125	1.0	20
Manganese	0.5	0.489	0.477	0.483	97	75-125	2.5	20
Nickel	0.5	0.483	0.478	0.480	96	75-125	1.1	20
Potassium	50	52.5	51.9	52.2	104	75-125	1.2	20
Silver	0.05	0.0488	0.0477	0.0483	97	75-125	2.2	20
Sodium	100	110	109	109	109	75-125	1.6	20
Vanadium	0.5	0.495	0.497	0.496	99	75-125	0.4	20
Zinc	0.5	0.496	0.489	0.492	98	75-125	1.6	20

Category: AS-FAA-AT
 Matrix: AQUEOUS
 QC Lot: 10 SEP 92-1A
 Concentration Units: mg/L

Arsenic	0.03	0.0329	0.0348	0.0338	113	75-125	5.6	2
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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	75-125	11	2
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Calculations are performed before rounding to avoid round-off errors in calculated results.

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

Analyte	Concentration		Measured DCS2	AVG	Accuracy Average(%)		Precision (RPD)	
	Spiked	DCS1			DCS	Limits	DCS	Limit
Category: HG-CVAA-AT Matrix: AQUEOUS QC Lot: 13 SEP 92-1A Concentration Units: mg/L								
Mercury	0.0010	0.000967	0.00100	0.000983	98	75-125	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								
Aluminum	10700	6840	7480	7160	67	47-153	8.8	20
Antimony	55.2	54.8	57.4	56.1	102	18-362	4.6	50
Arsenic	145	128	135	131	91	59-141	4.9	20
Barium	503	435	459	447	89	76-124	5.5	20
Beryllium	129	118	124	121	94	53-131	4.9	20
Cadmium	154	140	147	144	93	68-132	4.6	20
Calcium	7390	6600	6960	6780	92	79-121	5.4	20
Chromium	151	127	136	132	87	66-133	6.9	20
Cobalt	122	110	116	113	93	70-130	5.4	20
Copper	162	156	165	161	99	70-132	5.4	20
Iron	15400	12400	13400	12900	84	66-134	7.2	20
Lead	148	129	139	134	90	66-135	6.9	20
Magnesium	3740	3250	3480	3360	90	74-126	7.0	20
Manganese	423	376	397	387	91	74-125	5.5	20
Molybdenum	159	145	152	148	93	71-129	5.1	20
Nickel	166	154	162	158	95	67-133	5.1	20
Potassium	4050	3530	3770	3650	90	68-132	6.6	20
Silver	104	98.2	106	102	98	76-124	7.6	20
Sodium	747	717	766	741	99	57-130	6.6	20
Vanadium	154	135	142	138	90	73-127	5.2	20
Zinc	530	478	504	491	93	65-135	5.3	20

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

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

Analyte	Concentration Spiked	Concentration		AVG	Accuracy Average(%)		Precision (RPD)	
		DCS1	Measured DCS2		DCS	Limits	DCS	Limit
Category: PB-FAA-S								
Matrix: SOIL								
QC Lot: 14 SEP 92-1R								
Concentration Units: mg/kg								
Lead	150	132	148	140	93	50-150	11	20

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

METHOD BLANK REPORT
Metals Analysis and Preparation

Analyte	Result	Units	Reporting Limit
Test: ICP-AT			
Matrix: AQUEOUS			
QC Lot: 10 SEP 92-1A QC Run: 10 SEP 92-1A			
Barium	ND	mg/L	0.010
Cadmium	0.0099	mg/L	0.0050
Chromium	ND	mg/L	0.010
Test: AS-FAA-AT			
Matrix: AQUEOUS			
QC Lot: 10 SEP 92-1A QC Run: 10 SEP 92-1A			
Arsenic	ND	mg/L	0.0050
Test: PB-FAA-AT			
Matrix: AQUEOUS			
QC Lot: 10 SEP 92-1A QC Run: 10 SEP 92-1A			
Lead	ND	mg/L	0.0050
Test: HG-CVAA-AT			
Matrix: AQUEOUS			
QC Lot: 13 SEP 92-1A QC Run: 13 SEP 92-1A			
Mercury	ND	mg/L	0.00020
Test: AS-FAA-W			
Matrix: WASTE			
QC Lot: 11 SEP 92-1A QC Run: 11 SEP 92-1A			
Arsenic	ND	mg/kg	0.50
Test: ICP-W			
Matrix: WASTE			
QC Lot: 14 SEP 92-1R QC Run: 14 SEP 92-1R			
Cadmium	ND	mg/kg	0.50
Chromium	ND	mg/kg	1.0

METHOD BLANK REPORT
Metals Analysis and Preparation (cont.)

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

QC LOT ASSIGNMENT REPORT
Wet Chemistry Analysis and Preparation

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

DUPLICATE CONTROL SAMPLE REPORT
Wet Chemistry Analysis and Preparation

Analyte	Spiked	Concentration		Measured	AVG	Accuracy		Precision	
		DCS1	DCS2			Average(%)	(RPD)	DCS	Limit
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	
Category: TOX-A									
Matrix: AQUEOUS									
QC Lot: 10 SEP 92-1A									
Concentration Units: ug Cl/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



Appendix



Rocky Mountain Analytical Laboratory
4955 Yarrow Street
Arvada, CO 80002
303/421-6611 FAX: 303/431-7171

CHAIN OF CUSTODY

CHAIN OF CUSTODY				SAMPLE SAFE™ CONDITIONS		
ENSECO CLIENT		PACKED BY		SEAL NUMBER		
PROJECT		SEAL INTACT UPON RECEIPT BY SAMPLING COMPANY		CONDITION OF CONTENTS		
SAMPLING COMPANY		SEAL INTACT UPON RECEIPT BY		INITIAL CONTENTS TEMP. °C		
SAMPLING SITE		SEAL NUMBER		SAMPLING STATUS		
TEAM LEADER		SEAL INTACT UPON RECEIPT BY LAB		CONTENTS TEMPERATURE UPON RECEIPT BY LAB		
		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Done <input type="checkbox"/> Continuing Until		
				°C		
DATE	TIME	SAMPLE ID/DESCRIPTION	SAMPLE TYPE	# CONTAINERS	ANALYSIS PARAMETERS	REMARKS
8-18-92	12:49	CEEDAR HILL CDP WHITE TANK	LIQUID	1	PH / TDS	01
8-18-92	12:50	"	LIQUID	1	PH / TDS	02
8-18-92	12:51	"	LIQUID	4T	METALS	01
8-18-92	12:47	"	LIQUID	4T	METALS	02
8-18-92	12:40	"	LIQUID	15	TOX -- SINGLE	01
8-18-92	12:40	"	LIQUID	15	TOX -- SINGLE	02
8-18-92	11:30	WASTE OIL TANK CEDAR HILL	USED OIL			02
8-18-92	11:45	WASTE OIL TANK CEDAR HILL	USED OIL			
8-18-92	11:50	WASTE OIL TANK CEDAR HILL	USED OIL			
8-18-92	12:00	WASTE OIL TANK CEDAR HILL	USED OIL			

SHIPPING DETAILS

CUSTODY TRANSFERS PRIOR TO SHIPPING			SHIPPING DETAILS	
RELINQUISHED BY (SIGNED)	RECEIVED BY (SIGNED)	DATE	TIME	DELIVERED TO SHIPPER BY
Vern Kestelberg	Trace July	8/18/92	2:07	


RECEIVED FOR LAB	SIGNED	DATE/TIME
Trace	Trace	8/19/92
ENSECO PROJECT NUMBER		
24601		

White - CLIENT Pink - LAB

B

APPENDIX B

SPILL CONTROL PROCEDURES

	Reference (Book Title) Operations/Maintenance Field Services	Task/Document No. 21.10.020
	Section General/Safety	Regulation No.
	Subject Discharges or Spills of Oil or Hazardous Substances; Preventing, Controlling and Reporting of	Effective Date 09/22/99

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► Document History (ISO9001)

▼ Document Body

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, 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.

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

b. Transportation Related Facilities

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

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 oil and hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.

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.
- 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

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.

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.

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 that may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

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

D. PROCEDURE

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

Any Employee

D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity shall immediately contain the release (if safe to do so) and notify the facility superintendent, dispatcher, or other designee. Releases must be reported to gas control in the following three circumstances:

I. The Following Situations Always Require IMMEDIATE Reporting to Gas Control:

1. Release reaches or may reach surface water: (pond, lake, wash or ground water;
2. Release leaves Williams property; or
3. Release is of questionable nature (i.e., unknown product, unknown hazards)

II. Onsite Releases of Certain Common Industrial Materials Above 10 Gallon Threshold Are Reportable.

Releases that do not migrate off-site or reach surface water may require reporting as well. All releases of 10 gallons or greater of the following materials should be contained and promptly reported to Gas Control:

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

III. Releases of Certain Other Materials Reportable:

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

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

NOTE 1: A release includes material released (intentionally or unintentionally) to air, water,

or soil. When notifying Gas Control of a Release, be prepared to provide information on the type of material spilled, amount released, weather conditions, time and date of release, person discovering release and measures taken to control the release.

NOTE 2: Refer to Attachment A for containment procedures.

Facility Superintendent, Controller or Designee

D.1.2 Contacts Gas Control immediately by telephone and provides the following information:

- a. Name of company facility and/or location of facility and nature of discharge or spill
- b. Description and quantity of emission or substance discharged
- c. Description of the circumstances causing the discharge or spill
- d. Name, title and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
- e. Action taken or being taken to mitigate and correct discharge or spill
- f. Water bodies or streams involved
- g. Time and duration of discharge or spill
- h. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)

Gas Control Personnel

D.1.3 Advises Environmental Affairs departments immediately by telephone concerning the incident including any incidents reported by persons not employed with the Company.

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

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 or Designee

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

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

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.

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)	1. Closes appropriate block valves. 2. Contains Discharge or spill by: Ditching covering, applying sorbents, constructing an earthen dam, or burning. 3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	1.Straw 2.Loose 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
B. Vehicle	1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, apply sorbents, or burning. 2. Notifies immediately Environmental Affairs and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials.	

3. 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 or any other Facilities

1. Contains discharge or spill by: 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.

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c

APPENDIX C

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

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B. Plans, specifications and reports required by this Section, if related to facilities for the production, refinement and pipeline transmission of oil and gas, or products thereof, shall be filed instead with the Oil Conservation Division. [1-4-68, 12-1-95]

C. Plans and specifications required to be filed under this Section must be filed prior to the commencement of construction. [9-3-72]

1203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required: [2-17-74, 12-24-87]

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief of the Ground Water Protection and Remediation Bureau of the department, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

- a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;
 - b. the name and address of the facility;
 - c. the date, time, location, and duration of the discharge;
 - d. the source and cause of discharge;
 - e. a description of the discharge, including its chemical composition;
 - f. the estimated volume of the discharge; and
 - g. any actions taken to mitigate immediate damage from the discharge.
- [2-17-74, 2-20-81, 12-24-87, 12-1-95]

2. When in doubt as to which agency to notify, the

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person in charge of the facility shall notify the Chief of the Ground Water Protection and Remediation Bureau of the department. If that department does not have authority pursuant to commission delegation, the department shall notify the appropriate constituent agency. [12-24-87, 12-1-95]

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same department official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification. [12-24-87]

4. The oral and written notification and reporting requirements contained in this Subsection A are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein. [2-17-74, 12-24-87]

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge. [2-17-74, 12-24-87]

6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief of the Ground Water Protection and Remediation Bureau of the department or appropriate counterpart in a delegated agency, in an effort to determine the department's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days. [12-24-87, 12-1-95]

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the department. In the event that the report is not satisfactory to the department, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified

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time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the department. [12-24-87]

8. In the event that the modified corrective action report also is unsatisfactory to the department, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the department secretary. The department secretary shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the secretary concerning the shortcomings of the modified corrective action report, the department may take whatever enforcement or legal action it deems necessary or appropriate. [12-24-87, 12-1-95]

9. If the secretary determines that the discharge causes or may with reasonable probability cause water pollution in excess of the standards and requirements of Section 4103 of this Part, and the water pollution will not be abated within one hundred and eighty (180) days after notice is required to be given pursuant to Section 1203.A.1 of this Part, the secretary may notify the facility owner/operator that he is a responsible person and that an abatement plan may be required pursuant to Sections 4104 and 4106.A of this Part. [12-1-95]

B. Exempt from the requirements of this Section are continuous or periodic discharges which are made: [2-17-74]

1. in conformance with regulations of the commission and rules, regulations or orders of other state or federal agencies; or [2-17-74]

2. in violation of regulations of the commission, but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies. [2-17-74]

C. As used in this Section and in Sections 4100 through 4115, but not in other Sections of this Part: [2-17-74, 12-1-95]

1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water; [2-17-74]

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling

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stock, or activity of any kind, whether stationary or mobile;
[2-17-74]

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes; [2-17-74]

4. "operator" means the person or persons responsible for the overall operations of a facility; and
[12-24-87]

5. "owner" means the person or persons who own a facility, or part of a facility. [12-24-87]

D. Notification of discharge received pursuant to this Part or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement.
[2-17-74]

E. Any person who has any information relating to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, is urged to notify the Chief of the Ground Water Protection and Remediation Bureau of the department. Upon such notification, the secretary may require an owner/operator or responsible person to perform corrective actions pursuant to Sections 1203.A.5 or 1203.A.9 of this Part. [12-1-95]

[1204-1209] Reserved

1210. VARIANCE PETITIONS.

A. Any person seeking a variance pursuant to Section 74-6-4 (G) NMSA 1978, shall do so by filing a written petition with the commission. The petitioner may submit with his petition any relevant documents or material which the petitioner believes would support his petition. Petitions shall: [7-19-68, 11-27-70, 9-3-72]

1. state the petitioner's name and address;
[7-19-68, 11-27-70]

2. state the date of the petition; [7-19-68]

3. describe the facility or activity for which the variance is sought; [7-19-68, 11-27-70]

4. state the address or description of the property upon which the facility is located; [11-27-70]