

GW - 328

**PERMITS,
RENEWALS,
& MODS
Application**

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 12/07/10

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

from Williams Four Corners LLC

for GW-328

Submitted by: Laurie Renee Date: 12/15/10

Submitted to ASD by: Laurie Renee Date: 12/15/10

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

**WILLIAMS FOUR CORNERS LLC**

PO Box 21218

Tulsa, OK 74121-1218

Customer Support 1-866-778-2665

CHECK NUMBER	PAY DATE	SUPPLIER NO	SUPPLIER NAME	TOTAL AMOUNT
4027056835	12/09/2010	401845	STATE OF NEW MEXICO	*****100.00

INVOICE NUMBER	INV. DATE	INVOICE DESCRIPTION	NET AMOUNT
24-NOV-2010	20101124	OCD RENEWAL ADMINISTRATIVE FEES FOR THOMPSON COMPRESSOR FACI GW-328	100.00



Aaron Dailey
Williams Four Corners, LLC
188 County Road 4900
Bloomfield, NM 87413
505-632-4708 (office)

RECEIVED OOD

2010 DEC 14 P 2: 17

December 13, 2010

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

Subject: Discharge Plan Renewal Application
Williams Four Corners, LLC Thompson Compressor (GW-328)

Dear Mr. von Gonten:

Williams Four Corners, LLC submitted the Discharge Plan renewal application for the Thompson Compressor (GW-328) to you via email on December 10, 2010. A copy of the email was also forwarded to Brandon Powell, OCD District 3.

Enclosed please find a check for \$100 to cover the filing fee for the application.

If any additional information is needed, please contact me at (505) 632-4708.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Dailey".

Aaron Dailey
Environmental Specialist

Lowe, Leonard, EMNRD

From: Dailey, Aaron [Aaron.Dailey@williams.com]
Sent: Friday, December 10, 2010 1:01 PM
To: Lowe, Leonard, EMNRD
Cc: VonGonten, Glenn, EMNRD; Deklau, Ingrid; Powell, Brandon, EMNRD
Subject: GW 328 Williams FCA Thompson Compressor OCD Renewal application
Attachments: Williams GW328 Thompson OCD Renewal application 2010-12 .pdf

Leonard,

Please find the GW 328, Williams FCA Thompson Compressor OCD renewal application attached to this e-mail.

A subsequent mailing for the filing fee will be sent FEDEX to Santa Fe to your attention.

Please let me know if you have any questions.

Thanks,

aaron

Aaron Dailey

Environmental Specialist

Williams Four Corners, LLC

Office: (505)632-4708

Cell: (505)787-0719

Fax: (505)632-4781

aaron.dailey@williams.com

"MANY MEN GO FISHING ALL OF THEIR LIVES WITHOUT KNOWING THAT IT IS NOT FISH THEY ARE AFTER."

~HENRY DAVID THOREAU.

*\$100 filing fee mailed in 12.13.10
CHK# 4027056835*

12.10.10 E-MAIL ATTACHMENT

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 (Thompson Compressor Station, GW-328)
2. Operator: Williams Four Corners, LLC
Address: 188 CR 4900, Bloomfield, NM 87413
Contact Person: Aaron Dailey Phone: 505-632-4708
3. Location: SE/4 SE/4 Section 4 Township 30 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: Aaron Dailey; Signature:  Title: Environmental Specialist

E-mail Address: aaron.dailey@williams.com Date: December 10, 2010



Thompson Compressor Station

NMOCD Discharge Plan GW-328 Renewal

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

December 2010

Item 1

Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant (CO₂ removal) and compressor station include the total combined site rated horsepower.

The Thompson Compressor Station is owned and operated by Williams Four Corners, LLC (Williams). It is located approximately 7 miles northeast of Farmington, New Mexico. The station was constructed in 1971 to provide natural gas gathering, metering, compression, dehydration and delivery services through the Williams system to various producers. The air quality permit for this site has allowed the operation three turbines: one 1125-hp Solar turbine, one 3834 hp Solar turbine, and one 997-hp Solar turbine; and two reciprocating engines: one 958 hp White Superior, and one 1864-hp Waukesha 9390 GL. In addition, there are various storage tanks, support structures and ancillary equipment.

Item 2

Name of operator or legally responsible party and local representative.

**Legally Responsible Party/
Operator**

Williams Four Corners, LLC
188 County Road 4900
Bloomfield, NM 87413
(505) 632-4600/4634
(800)-645-7400 (24 hour emergency notification)

Local Representative

Aaron Dailey
Williams Four Corners, LLC
188 County Road 4900
Bloomfield, NM 87413
(505) 642-4708

Item 3

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

San Juan County, New Mexico
Township 30 North, Range 12 West, SE/4 SE/4 Section 4
The topographic map is attached as Figure 1.

Item 4

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

Williams is leasing the subject property from:
Bureau of Land Management
1235 N. La Plata Highway
Farmington, NM 87401
(505) 599-8900

Item 5

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

A new turbine has been installed at the facility within an enclosure, and the facility tank list has been updated. The facility plot plan has been updated and is included with this document as Figure 2.

Item 6

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

Table 1 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

MSDSs for materials at the site will be maintained in Williams' corporate office and will be available upon request.

Item 7

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

The source, quantity, and quality of effluent and waste solids expected to be generated at the compressor station are summarized in Table 2.

Item 8

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

There have been no modifications except that used oil filters and oil soaked pads and socks will be recycled per OCD regulations. This is reflected in Table 1, which describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site. See additional information on-file at OCD.

Item 9

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

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

Item 10

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

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

Item 11

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

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

Item 12

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

A table below was updated based on a current well search that was performed using the New Mexico Office of the State Engineer's WATERS Database(1) for this renewal application. Information on the documented water well in the vicinity of the Thompson Compressor Station is presented in the table below. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 200-2,000 mg/l. Depth to groundwater is estimated to be 35-100 feet. See additional information on-file at OCD.

The table below presents available information provided for the 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)
30N; 12W; 4	1414	~0.4					Nacimiento Formation	67.4
30N; 12W; 10	44	1-1.5	SJ 00421	Dom	126	110-126	Sandstone/Gravel/Conglomerate	43
30N; 12W; 10	43	0.8-1.2	SJ 00945	Dom	130	90-130	Sandstone/Gravel/Conglomerate	70
30N; 12W; 4	34	0.1-0.4	SJ 01692	Dom	156	130-150	Sandstone/Gravel/Conglomerate	65
30N, 12W, 10	242	0.75-1	SJ 03767 POD1	Dom	265	185-265	Sandstone/Gravel/Conglomerate	82
30N; 12W; 4	34	0.1-0.4	SJ 01792	Dom	155	132-150	Sandstone/Gravel/Conglomerate	109
30N; 12W; 4	34	0.1-0.4	SJ 01798	Dom	158	118-125	Shallow Alluvium/Basin Fill	70
30N; 12W; 4	34	0.1-0.4	SJ 01898	Dom	140	84-140	Sandstone/Gravel/Conglomerate	88
30N; 12W; 10	43	0.8-1.2	SJ 02128	Dom	140	95-105	Sandstone/Gravel/Conglomerate	60
30N; 12W; 4	111	1.1-1.3	SJ 02145	Dom	160	130-160	Sandstone/Gravel/Conglomerate	110
30N; 12W; 4	34	0.1-0.4	SJ 02341	Dom	85	47-52	Sandstone/Gravel/Conglomerate	39
30N, 12W, 4	444	0.1-0.25	SJ 03447	Dom	120	100-120	Sandstone/Gravel/Conglomerate	80
30N; 12W; 4	334	~0.1-0.3	SJ 03058	Dom	120	52-60	Sandstone/Gravel/Conglomerate	48

Note a: 1=NW/4; 2=NE/4; 3=SW/4; 4=SE/4 from smallest to largest (eg. Q/64; Q/16; Q4)

Note b: min = mining, milling, or oil

References

¹Online Well Reports and Downloads, New Mexico Office of the State Engineer, search performed 11/7/2010.

²Stone, 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.

Item 13

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

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

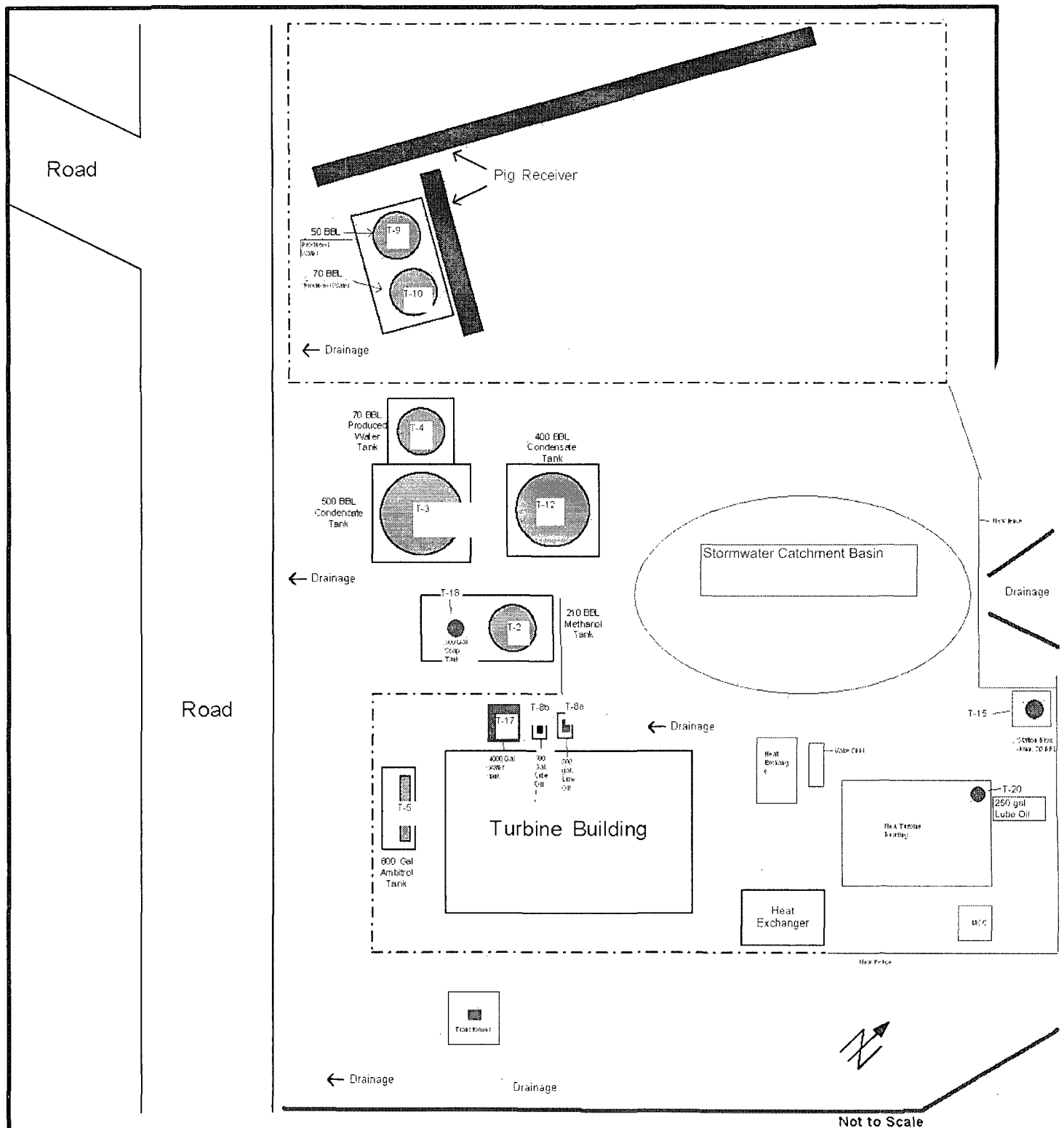


Figure 2 Facility Site Plan
Thompson Compressor Station
 San Juan County, New Mexico

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
Condensate/Produced Water	Above ground storage tank	T3) 500 bbl T12) 400 bbl	Metal walls/earth berm Lined Berm	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.
Produced Water	Above ground storage tank	T4) 2940 gal T9) 2100 gal T10) 70 bbl	Lined Berm	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	Drum or other container	Varies	Mobile unit	Non-exempt	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.
Used oil/blowdown	Above ground storage tank	T15) 2100 gal	Lined berm	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling; 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.
Used Oil	Drum or other container	Varies	Mobile unit	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters, Oil Soaked Pads & Socks	Drum or other container	Varies	Transported to Williams or contractor facility in drum or other container	Non-exempt	Used oil filters and oil soaked pads and socks will be recycled as required by OCD regulations.
Used Process Filters	Drum or other container	Varies	Transported to 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 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 (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 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 or transported to 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.

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Deionized Water	Above ground storage tank	T17) 4000 gal	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Soap Tank	Above ground storage tank	T18) 500 gal	Metal walls/earth berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol Tank	Above ground storage tank	T5) 800 gal	Metal walls/earth berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above ground storage tank	T8a) 500 gal T8b) 500 gal T20) 250 gal	Metal walls/earth berm; Metal walls/earth berm; Metal ring in bldg	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol	Above ground storage tank	T2) 210 bbl	Metal walls/earth berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Condensate/Produced Water	Scrubber, Gas Inlet Separator, Dehydrators Condensate Tank	7500-20,000 bbl/yr	May contain trace lube oil
Produced Water	Scrubber, Drawn off condensate tank	200-3000 bbl/yr	May contain trace lube oil
Wash Down Water	Compressor Skid	1000-5000 gal/yr/engine	Biodegradable soap with traces of used oil
Used Oil	Turbines; Recip Engines	500-1500 gal/yr/unit	Used Oil w/ No Additives
Used Oil Filters	Turbines; Recip Engines	50-500/year/unit	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Ambitol	200-500 filters/year	No Additives
Empty Drums/Containers	Liquid Containers	50-100/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
Used/off-spec materials (eg. glycol, antifreeze, corrosion inhibitor, etc.)	Dehydration and compression	0-200 gal/yr/material	No Additives

See attached DRAFT Public Notice, to include the following:

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

PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in December 2010 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-328 for their Thompson Compressor Station. The facility is located in Section 4, Township 30 North, Range 12 West, San Juan County, New Mexico, approximately 7 miles northeast of Farmington. The facility provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of used oil generated is expected to be approximately 500 – 1500 gallons per year per unit. The facility does not discharge to surface or subsurface waters. All waste generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be 35-100 feet. The ground water in the area is expected to have a total dissolved solids concentration of approximately 200-2,000 mg/l.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

ATENCIÓN PÚBLICA

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, presentó una solicitud de renovación en diciembre de 2010 para el New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para previamente aprobado Discharge Plan GW-328 para su Thompson Compressor Station. La planta está ubicada en la Sección 4, Municipio 30 Norte, Rango 12 West, en San Juan County, New Mexico, aproximadamente 7 millas al noreste de Farmington, New Mexico. La instalación dispone de compresión de gas natural y servicios de acondicionamiento.

El plan se aborda cómo derrames serán manipulados. Materiales típicos generados o utilizados en la instalación incluyen gas natural condensado, agua producida, aceite, glicol y aceitosos agua de equipo de lavado. La cantidad de aceite usado generados se espera sea de aproximadamente 500-1500 galones por año por unidad. La instalación no libera los residuos líquidos a la superficie o las aguas subterráneas. Todos los desechos generados se temporalmente almacenados en tanques o contenedores equipados con contención secundaria. Residuos trasladados fuera será eliminado o reciclados en una instalación permitidas por estatales, federales, o tribales agencia para recibir esos residuos. La estimación de la profundidad del agua subterránea en el sitio se espera que sea por lo menos 35-100 pies. El total se disolvió se espera que la concentración de sólidos del agua subterránea de área esté en la variedad de 200-2000 partes por millón.

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



Four Corners Area
Environmental Department
#188 County Road 4900
Bloomfield, N.M. 87413
Phone: (505) 632-4708
Fax: (505) 632-4781

December 10, 2010

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC submitted a Discharge Plan Renewal application to the Oil Conservation Division for the permitted Thompson Compressor Station (GW-328) in December 2010. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations.

The facility, located in Section 4, Township 30 North, Range 12 West, San Juan County, New Mexico, approximately 7 miles northeast of Farmington, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of used oil generated is expected to be approximately 500 – 1500 gallons per year per unit. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be 35-100 feet. The ground water in the area is expected to have a total dissolved solids concentration of approximately 200-2,000 mg/l.

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

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

Respectfully submitted,

Aaron Dailey
Environmental Specialist



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

March 3, 2006

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

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

**RE: Discharge Permit Renewal GW-328
Williams Field Services, Inc.
Thompson Compressor Station
San Juan County, New Mexico**

Dear Mr. Bays:

The ground water discharge permit renewal application GW-328 for the Williams Field Services, Inc. Thompson Compressor Station located in the SE/4 SE/4 of Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge permit application was submitted on January 17, 2001 and approved April 13, 2001. The discharge permit renewal application letter, dated December 9, 2005, submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge permit is renewed pursuant to 20 NMAC 3106.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provides for possible future amendment or modifications of the permit. Please be advised that approval of this permit does not relieve Williams Field Services, Inc. of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Mr. David Bays
GW-328 Thompson Compressor Station
March 3, 2006
Page 2

Pursuant to 20 NMAC 3109.G.4., this renewal permit is for a period of five years. This renewal will expire on **April 13, 2011**, and Williams Field Services, Inc. should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge permit facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge permit .

The discharge permit renewal application for the Williams Field Services, Inc. Thompson Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a fee equal to the filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The OCD has not received the filing fee.

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

Sincerely,



Wayne Price
Chief, Environmental Bureau
Oil Conservation Division

WP/wjf
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-328
WILLIAMS FIELD SERVICES, INC.
THOMPSON COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(March 3, 2006)

1. Payment of Discharge Permit Fees: The \$100.00 filing fee has not been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated December 9, 2005 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

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

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

Accepted:

WILLIAMS FIELD SERVICES

by _____

Title

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-328
WILLIAMS FIELD SERVICES, INC.
THOMPSON COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(March 3, 2006)

1. Payment of Discharge Permit Fees: The \$100.00 filing fee has not been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated December 9, 2005 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
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12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
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16. Closure: The OCD will be notified when operations of the Thompson Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Thompson Compressor Station a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by Claude Caroz for David Bays
Environmental Compliance
Title

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9/19/05,
or cash received on _____ in the amount of \$ 300.00

from Williams Field Services

for Harc C.S.
Hotse Canyon C.S.
Thompson C.S.

GW-343
GW-661
GW-328

Submitted by: [Signature] Date: 12-13-05 (DP No.)

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal ☒

Modification _____ Other _____ (specify)

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

WILLIAMS FIELD SERVICES

1220 S ST FRANCIS DR

SANTA FE, NM 87505

Customer Support 1-800-729-8663

PAY TO THE ORDER OF

PAY

\$*****300.00

USD

NEW MEXICO OIL CONSERVATION DIV
1220 S ST FRANCIS DR

SANTA FE
UNITED STATES

NM 87505

[Signature]
Authorized Signer

SUPPLIER NUMBER
403816

ATTACHMENT TO THE DISCHARGE PLAN GW-328
WILLIAMS FIELD SERVICES
THOMPSON COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(April 13, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated January 17, 2001 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
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13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.

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

Accepted:

Clara M. Jaccia

WILLIAMS FIELD SERVICES

by *Environmental Compliance*

Title



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

April 13, 2001

Lori Wrotenbery

Director

Oil Conservation Division

CERTIFIED MAIL

RETURN RECEIPT NO. 5051 0289

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

**RE: Discharge Plan Approval GW-328
Williams Field Services
Thompson Compressor Station
San Juan County, New Mexico**

Dear Ms. Garcia:

The ground water discharge plan GW-328 for the Williams Field Services Thompson Compressor Station located in the SE/4 SE/4 of Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The original discharge plan application was submitted on January 17, 2001 pursuant to Section 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Ms. Clara L. Garcia
GW-328 Thompson Compressor Station
April 13, 2001
Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **April 13, 2006**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

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

The discharge plan application for the Williams Field Services Thompson Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The OCD has received the filing fee.

**Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 North St. Francis Drive
Santa Fe, New Mexico 87505.**

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Aztec Office

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only. No Insurance Coverage Provided)	
Article Sent To:	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Name (Please Print Clearly) (To be completed by mailer)	
C. Garcia	
Street, Apt. No., or PO Box No.	
WFS	
City, State, ZIP+ 4	
GW-328	

7099 3220 0000 5051 0289

PS Form 3800, July 1999 See Reverse for Instructions

ATTACHMENT TO THE DISCHARGE PLAN GW-328
WILLIAMS FIELD SERVICES
THOMPSON COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(April 13, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated January 17, 2001 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
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Accepted:

WILLIAMS FIELD SERVICES

by _____
Title

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 1/9/01,
or cash received on _____ in the amount of \$ 250.00

from Williams Field Services
for Bianco C.S. / Keblah C.S. / ~~Thompson C.S.~~ / Dodge C.S. / Chazo C.S. GW-327 GW-328
GW-329 GW-330 GW-33

Submitted by: [Signature] Date: 01/24/01

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 COMPANY

1800 South Baltimore Avenue • P.O. Box 645 • Tulsa, OK 74101-0645

78-2322/745
A/C 9401076

DATE: 01/09/2001

PAY TO THE ORDER OF:

PAY → *****\$250.00

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

INVOICE NUMBER		INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
JANUARY5		20010105	0000708-FCA010107010	ATTN: JACK FORD DISCHARGE PLAAN APPLICATIO	250.00
CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME		TOTAL AMOUNT
	01/09/2001	40665	NEW MEXICO OIL CONSERVATION DI		\$250.00

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 (Thompson Compressor Station, GW-328)

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, NM 87413

Contact Person: David Bays

Phone: 505-634-4951

3. Location: Section 4 Township 30 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: 12/09/05

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

RECEIVED
OIL CONSERVATION
DIVISION



Thompson Compressor Station

NMOCD Discharge Plan GW-328

Williams Field Services
188 CR 4900
Bloomfield, NM 87413



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Figure 2 - Facility Plot Plan

List of Appendices

Appendix A – WFS Spill Control Procedures

Appendix B – NMOCD Notification and Corrective Action

Appendix C – Public Notice



1.0 TYPE OF OPERATION

The Thompson Compressor Station was built in 1971 to 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.

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 Thompson Compressor Station is located in Section 4, Township 30 North, Range 12 West, in San Juan County, New Mexico, approximately 7 miles northeast of Farmington, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangles: Flora Vista, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

4.0 LANDOWNER

Williams Field Services (WFS) is leasing the subject property from:

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

5.0 FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation two turbines: one 1125-hp Solar turbine and one 891-hp Solar turbine; and two reciprocating engines: one 958 hp White Superior, and one 1864-hp Waukesha 9390 GL. In addition, there are various storage tanks, support structures and ancillary equipment.

6.0 SOURCE, QUANTITY AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

The source, quantity, and quality of effluent and waste solids generated at the plant 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, certain absorbents, spill residues, 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, laboratory waste, empty drums, 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 microrentgens per hour. If affirmed, such materials will be handled and disposed in accordance with NMOCD NORM Regulations.

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

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 facility. The facility will be remotely monitored for equipment malfunctions and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. Regular inspections will be conducted throughout the facility. 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).



Thompson Compressor Station NMOCD Discharge Plan

Effective Date:

December 2005

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11.0 SITE CHARACTERISTICS

The Thompson Compressor Station is located approximately 7 miles northeast of Farmington, New Mexico. The site elevation is approximately 5800 feet above mean sea level. The natural ground surface topography slopes downward toward the southwest. The maximum relief over the site is approximately 5 feet.

Intermittent flow from the site will follow the Flora Vista Arroyo drainage towards the southeast. The Flora Vista Arroyo drains into the Animas River, approximately 3.2 miles southeast of the site. The Animas River, at approximately 5480 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 eleven water wells within a radius of approximately one-mile of the Thompson Compressor Station. The water-bearing unit in this area is the Nacimiento Formation. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 35 to 100 feet. The total dissolved solids concentration of area ground water ranges from 200 to 2,000 PPM.

The table below presents available information provided for the well.

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)
30N; 12W; 4	1414	~0.4					Nacimiento Formation	67.4
30N; 12W; 10	44	1-1.5	SJ 00421	Dom	126	110-126	Sandstone/Gravel/Conglomerate	43
30N; 12W; 10	34	0.8-1.2	SJ 00945	Dom	130	90-130	Sandstone/Gravel/Conglomerate	70
30N; 12W; 4	43	0.1-0.4	SJ 01692	Dom	156	130-150	Sandstone/Gravel/Conglomerate	65
30N; 12W; 4	43	0.1-0.4	SJ 01792	Dom	155	132-150	Sandstone/Gravel/Conglomerate	109
30N; 12W; 4	43	0.1-0.4	SJ 01798	Dom	158	118-125	Shallow Alluvium/Basin Fill	70
30N; 12W; 4	43	0.1-0.4	SJ 01898	Dom	140	84-140	Sandstone/Gravel/Conglomerate	88
30N; 12W; 10	34	0.8-1.2	SJ 02128	Dom	140	95-105	Sandstone/Gravel/Conglomerate	60
30N; 12W; 4	111	1.1-1.3	SJ 02145	Dom	160	130-160	Sandstone/Gravel/Conglomerate	110
30N; 12W; 4	43	0.1-0.4	SJ 02341	Dom	85	47-52	Sandstone/Gravel/Conglomerate	39
30N; 12W; 4	433	~0.5	SJ 03058	Dom	120	52-60	Sandstone/Gravel/Conglomerate	48

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.

	Thompson Compressor Station NMOCD Discharge Plan	
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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

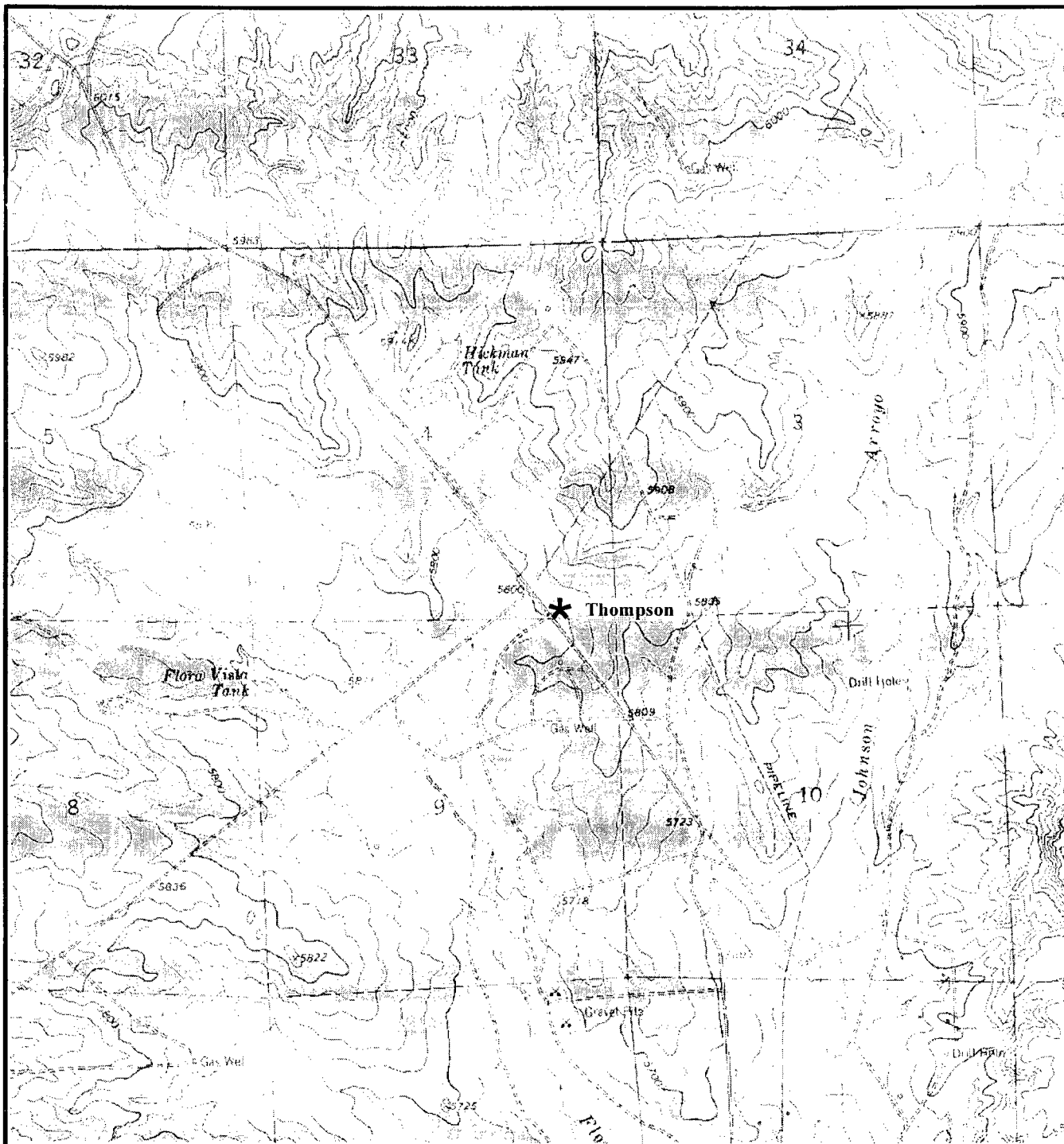
TABLE 1
SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS
THOMPSON COMPRESSOR STATION

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Natural Gas Condensate	Scrubber, Gas Inlet Separator	2000-5000 bbl/year	No Additives
Produced Water/Waste Water	Drawn off Natural Gas Condensate Tank	2000-4000 bbl/year	No Additives
Wash Down Water	Compressor Skid	1000-5000 gal/year/engine	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressor	1000-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	200-500/year/engine	No Additives
Used Process Filters	Inlet, Fuel Gas	200-500/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

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Natural Gas Condensate	Above Ground Storage Tank	500 bbl 400 bbl 100 bbl	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	1 @ 100 bbl 4 @ 70 bbl 250 gal	Berm	Exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Wash-down Water	Drum or other container	Varies	Mobile unit	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to NMOCD-approved facility; or to evaporation at WFS facility.
Used Oil	Drum or other container	Varies	Mobile unit	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a 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.
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.
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.
Empty Drums / Containers	N/A	N/A	Berm	Non-exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Ambitrol	Above Ground Storage Tank	800 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above Ground Storage Tank	3000 gal 2 @ 500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol	Above Ground Storage Tank	210 bbl 1000 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol	Above Ground Storage Tank	210 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

FIGURES

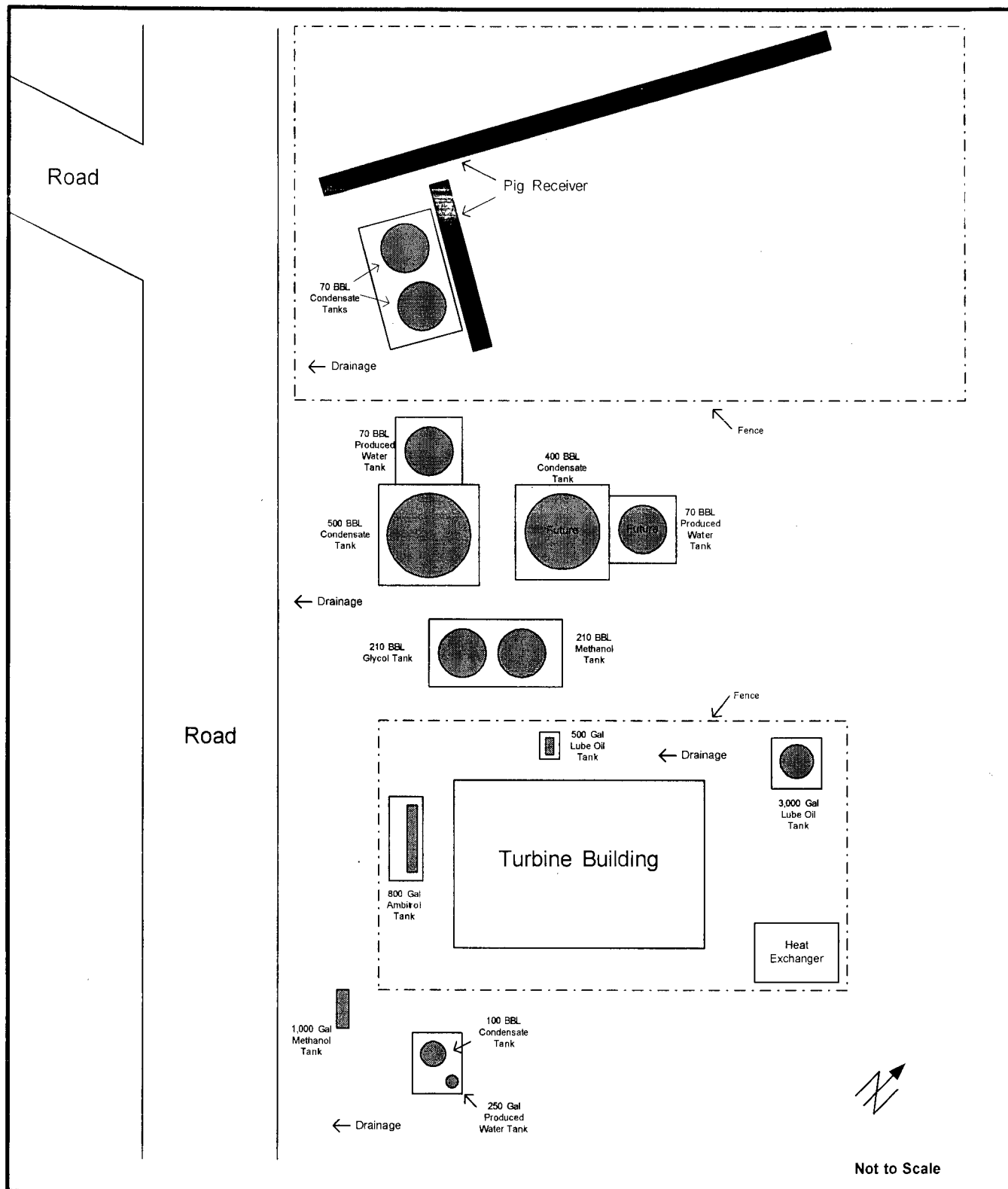


Source: USGS Flora Vista, New Mexico Quadrangle

0 2000
Scale (Feet)



Figure 1 Site Vicinity / Topographic Map
Thompson Compressor Station
 Section 4, Township 30N Range 12W
 San Juan County, New Mexico




Not to Scale



Figure 2 Facility Site Plan
Thompson Compressor Station
 San Juan County, New Mexico

APPENDICES

Appendix A
WFS Spill Control Procedures

	System Integrity Plan	Element: Environmental Protection	Document No: 6.04-ADM-001	
		Revision No: 7	Revision Date: 01/01/06	Page: 1 of 7
Procedure: POLLUTION PREVENTION AND CONTROL				

1.0 PURPOSE

- 1.1 To determine 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 Pollution Prevention Plans

- 2.1.1 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).

2.1.1.1 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.

2.1.1.2 A Facility Response Plan is a written document that describes the procedures for responding to a spill.

- 2.1.2 The Environmental Specialist is responsible for:

2.1.2.1 Evaluating applicability of these plans for each facility and preparation of SPCC Plans or FRPs as required.

2.1.2.2 Evaluating approved plans and populating EMIS with all plan requirements and any associated best management practices.

2.1.2.3 Communicating plan requirements with Operations.

2.1.2.4 Providing site-specific training to Operations.

2.1.2.5 Scheduling and performing an Annual SPCC facility inspection.

NOTE

If your facility requires a Facility Response Plan (FRP), it will include an Emergency Response Plan (referred to as an Emergency Response Action Plan (ERAP) by the EPA regulations). A separate ERP specified 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.

2.1.3 Operations is responsible for:

- 2.1.3.1 Providing initial and Annual review of plan(s), providing comments to the Environmental Specialist (ES) and meeting published timeframes for reviews and comments.
- 2.1.3.2 Ensuring it is capable of complying with Plan requirements, including monitoring, recordkeeping, and reporting.
- 2.1.3.3 Performing inspections required by the plan(s).
- 2.1.3.4 Maintaining documentation required by the plan(s) on the appropriate forms.
- 2.1.3.5 Conducting annual drills if an FRP is in place for the facility.
- 2.1.3.6 Ensuring adequate response contractors are available in the area.
- 2.1.3.7 Performing 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 at least Annually. Document Inspections on 0019 – External Visual Tank Inspection form.
- 2.1.3.8 Maintaining 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.
- 2.1.3.9 Coordinating training for all personnel with the Environmental Specialist as part of the required annual review.
- 2.1.3.10 Perform maintenance or repairs necessary to prevent or stop leaks or releases and document the work following company maintenance and repair procedures.

- 2.1.3.11 Documenting 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.

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 **EPA** – Environmental Protection Agency
- 4.3 **Facility** – Any terminal, facility, pipeline, etc. owned or operated by Williams.

- 4.4 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.
- 4.5 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>.
- 4.6 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.
- 4.7 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).
- 4.8 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.
- 4.9 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.
- 4.10 USCG** – United States Coast Guard


➤➤➤End of Procedure<<<

System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
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	Deleted: When to Initiate 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. 2.5.2 For onshore releases: If the spill is reportable (refer to <u>6.04-ADM-002 - Release Reporting</u> procedure), 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. <div style="text-align: center;">NOTE</div> 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. 2.5.3 Offshore releases: If the spill creates a sheen (refer to <u>6.04-ADM-002 - Release Reporting</u> procedure), 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

		<p>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
	Entire document	Rearranged, renumbered, rewrote to clarify responsibilities
7-26-05	Note	Shortened to clarify

	4.0	Deleted definitions not associated with this procedure.
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	System Integrity Plan	System Integrity Plan	Document No. 6.04-ADM-002	
		Revision No. 8	Effective Date: 01/01/06	Page: 1 of 7
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
04/18/04	2.3.1.3 – 2.3.1.7 and 2.4.2.5 – 2.4.2.9; 4.0 – Definitions; and 2.4.4 Document Header General	Added reporting requirements from 49 CFR 191, 192 & 195; Added 4.6, 4.7 and 4.8; Changed "Title E" to "Tidally"; Established link to WES-35 – Release Report Form; Changed "Energy Services" to "System Integrity Plan," changed revision number from 5 to 6 and changed effective date to 04/19/04; and Made miscellaneous obvious corrections.
09/15/04	Entire Document	Reordered and rewritten Added Plans Required of Pipelines/Facilities Clarified that 3E needs to be called as soon as possible and corrections made later.

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		Day		Year	
Release Verification Time:				Release Stop Time:	
Region		District		Area	
Location Name				Location Identifier	
Mainline Name				Mainline Identifier	
Area Manager				Company Asset	
Address				County	
				Zip Code	
Release Discovered by:				Time	
Release Reported by:				Time	
Section		Township		Range	
				Milepost	
				Tract #	
Offshore	No	Latitude		Longitude	
Release Reportable?	No	Waterway Affected?	No	Name	
Report	Date	Number	Time	Name	Title
NRC					City
SERC					State
LEPC					
TRRC					
EPA					
Other					
Product Released:				Total BBL's Released	0
Cause of Release:				BBL's Recovered Wet	0
				BBL's Recovered Soil	0
Released To:				Total BBL's Recovered	0
Other:				BBL's Not Recovered	0
Remarks:					
Origin Of Release:					
Temperature		Relative Humidity		Precipitation	
Cloud Cover		Wind Speed		Wind Direction	
Injury	No	Death	No	Fire	No
				Explosion	No
Unconsciousness	No	Hospitalization	No		
Loss/Damage Estimate					
Incident Investigator:					
Environmental Contact for this Release:					
Safety Contact for this Release:					
Compliance Administrator for this area:					
Form completed by:					
Completion Date:					
Form was e-mailed to Williams on:					

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

December 5, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Thompson Compressor Station (GW-328). 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 December 2005.

The facility, located in Section 4, Township 30 North, Range 12 West, San Juan County, New Mexico, approximately 7 miles northeast of Farmington, 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 at least 35 to 100 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 Cardoza
Environmental Compliance Administrator

7004 2510 0005 2372 4019	FARMINGTON, NM 87401	
	0.37	UNIT ID: 0012
	2.30	
	1.75	
	4.42	Clerk: KK4R43
		12/06/05
BLM 1235 N. La Plata Hwy Farmington, NM 87401		

PUBLIC NOTICE

Notice of Discharge Plan Renewal Application

Thompson 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 Thompson Compressor Station. Williams expects to submit the permit application to the Oil Conservation Division in December 2005.

The facility, located in Section 4, Township 30 North, Range 12 West, San Juan County, New Mexico, approximately 7 miles northeast of Farmington, 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 at least 35 to 100 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.