GW-

GENERAL CORRESPONDENCE

YEAR(S):





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

December 28, 2006

Mr. Shiver J. Nolan Senior Compliance Administrator Enterprise Products Operating, L.P. P.O. Box 4324 Houston, Texas 77210-4324

RE: Discharge Plan Permit Renewals Mid-America Pipeline Company, LLC Natural Gas Liquid Pipeline System GW-335 (Huerfano Pump Station) San Juan County, New Mexico

Dear Mr. Nolan:

The New Mexico Oil Conservation Division (OCD) has received Enterprise Products Operating, L.P. request dated May 11, 2006, on the behalf of Mid-America Pipeline Company, LLC, to renew the discharge plan permit GW-335 for the Mid-America Pipeline Company, LLC Huerfano Pump Station located in the NW/4 of the SW/4 of Section 21, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The initial submittal did not include the required filing fee in order to initiate the review process. The filing fee was received and processed on October 26, 2006. The two submittals and a follow up email, which proposed the newspaper to publish the public notice, provided the required information in order to deem the application "administratively" complete.

Now that the submittal is deemed "administratively" complete, the New Mexico Water Quality Control Commission regulations (WQCC) public notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the OCD. The OCD recommends a draft version of the public notice be provided for a pre-review prior to publishing in the newspaper and providing notice by certified mail to the property owner, in order to ensure all of the required information is provided prior to translation into Spanish and to prevent the expenditure of additional funds to republish the public notice.

The review of the submittal is to determine if any additional information or modifications may be required before consideration for technical approval. The submittal has been determined to be technically incomplete. Therefore, the OCD requests additional information. All technical issues

> Oil Conservation Division * 1220 South St. Francis Drive * Santa Fe, New Mexico 87505 Phone: (505) 476-3440 * Fax (505) 476-3462 * http://www.emnrd.state.nm.us

Mr. Nolan December 28, 2006 Page 2 of 3

must be resolved prior to OCD's consideration for approval and initiation of the notice requirements of Subsection H of 20.6.2.3108 NMAC. In order to expedite and shorten the review and the OCD public notice time period, the OCD recommends that the requested information and modifications be provided within two weeks of receipt of this letter. A list of the required changes, additions, and corrections is provided below:

Page 1, Section III, Location of Facility

Please provide a street address, if available, and sufficient information to locate the discharge location with respect to surrounding landmarks.

Page 2, Section VII

The third paragraph suggests that laboratory analyses of non-exempt will occur once during the approval period of this plan and at a minimum of once every five years. OCD requires more frequent verification sampling. Wash-down bay water should be analyzed annually and all other non-exempt waste should be analyzed at a minimum once every two years. Please make the appropriate changes to this section.

Page 3, Table 2

Please identify the Enterprise and/or contractor consolidation point, specified in several descriptions of final disposition, in order to demonstrate that non-exempt waste will be handled appropriately and transported to an OCD approved facility.

Please specify the containment and spill prevention methods that are and/or will be implemented for the temporary on-site storage of used oil filters and process filters awaiting transport.

The description of final disposition for wash-down water suggests that evaporation at the Enterprise facility may be considered in the future. Please omit this proposal if it is not something that is currently being proposed (a modification) for approval in this submittal. If an evaporation method is a proposal, please provide design and operational details pertaining to the method and implementation and change the application status to include "modification and renewal".

The suggested containment/spill prevention proposals, in situ treatment, landfarming or an alternative method, for spill residue are not considered a method of containment. They would be considered a part of a process of final disposition and a modification, which would require approval prior to implementation. Please specify the method of containment for spill residue. If in situ treatment, landfarming or an alternative method is proposed for final disposition, please provide design and operational details pertaining to the method and implementation and change the application status to include "modification and renewal."

The description of final disposition of off-spec material recycled or disposed must be in compliance with RCRA. Please modify the table to reflect the requested changes and information referenced above.

Page 4, Section VIII, Storm Water Plan

Mr. Nolan December 28, 2006 Page 3 of 3

The second paragraph states "this section concentrates on the identification of potential pollutants, identification of personnel responsible for the implementation, inspection and maintenance of the pollutant controls, and gives a description of structural controls to prevent storm water pollution." This is the appropriate information for this section. Please provide the information listed in the statement.

Page 4, Section VIII, Storm Water Plan – Site Assessment and Facility Controls

The plan states that "there are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow." It also states that "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 this impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant." Engineered storm water controls must be proposed, installed, and implemented. The engineered storm water controls must be properly located and constructed to prevent releases from entering any drainage ditches, culverts, or watercourses. Please provide the details of the storm water plan and also mention the containment and spill prevention features listed in Table 2.

Page 5, Section X, Spill/Leak Prevention and Reporting (Contingency Plan)

Please clarify the containment volume requirements for above ground tanks by specifying that the containment berm must be designed to contain one and one-third times the volume of the largest tanks or *the combined volume of interconnected tanks*, which ever one applies.

Page 6, Section XII, Facility Closure Plan

Please properly reference the Water Quality Control Commission (WQCC) in the first paragraph. In the second paragraph, please include the removal of all above and below ground tanks in the general closure measures.

Release Reporting Procedures, Interoffice Communication

Please include OCD contact information and notice criteria in the release reporting procedures.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or <u>brad.a.jones@state.nm.us</u>. 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, Brad A. Jones Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec Runell A. Seale, Permitting Specialist, EPCO, Inc., Farmington, NM

Jones, Brad A., EMNRD

From:	Seale, Runell [RSeale@eprod.com]				
Sent:	Friday, October 27, 2006 8:23 AM				
То:	Jones, Brad A., EMNRD				
Cc:	Fernald, Donald				
Subject: RE: Renewal Applications for Mid-America Pipeline Company pump stations.					
Attachments	Attachments: Public Notice - Caprock Renewal.doc; Newspapers-OCD.xls				

Hello Brad,

I have attached a sample public notice in English for the Caprock station. The other stations will be similar with site specific location data for each of the eleven facilities. I will have this translated into Spanish after you approve the wording. I have also attached a spreadsheet that lists the newspapers I plan to have the notice/advertisement published in. Please advise if you have any questions.

Runell A. Seale

Specialist, Environmental Permitting EPCO, Inc. 614 Reilly Ave. Farmington, NM 87401 505 599-2124 office 505 599-2538 fax 505 320-2816 cell e-mail: rseale@eprod.com

From: Jones, Brad A., EMNRD [mailto:brad.a.jones@state.nm.us]
Sent: Tuesday, October 03, 2006 3:27 PM
To: Seale, Runell
Subject: RE: Renewal Applications for Mid-America Pipeline Company pump stations.

Runell,

I have attached a copy of the July 2006 WQCC regulations (20.6.2.3108 NMAC) regarding only the notice requirements. The highlighted (red) sections are the tasks that must be satisfied for renewals. Please review Subsections A and C closely. Subsections A specifies what must be submitted in order to to be deemed administratively complete and Subsection C specifies the notice requirements for renewals. It is recommended that a draft notice is submitted to us for review to determine if all of the required information and language of Subsection F is provided, prior to publication. You will find that the questions proposed below are answered in the highlighted sections. If you have any additional questions, please do not hesitate to contact me.

FYI: The requirements for new permits and modifications for different from renewals.

Brad

Brad A. Jones Environmental Engineer Environmental Bureau NM Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, New Mexico 87505 E-mail: <u>brad.a.jones@state.nm.us</u> Office: (505) 476-3487 Fax: (505) 476-3462

From: Seale, Runell [mailto:RSeale@eprod.com]
Sent: Tuesday, October 03, 2006 2:11 PM
To: Jones, Brad A., EMNRD
Subject: Renewal Applications for Mid-America Pipeline Company pump stations.

Brad,

In reviewing the new guidelines (June 2006) I notice that the language refers to "in a form provided by the department" Would you please provide an example of the format that is required for the synopsis publication notice, in English and Spanish.

I also note that we must not put this in the legal notice section. I assume that this means it should look like a box advertisement, is that correct?

Runell A. Seale

Environmental Specialist EPCO, Inc. 614 Reilly Ave. Farmington, NM 87401 505 599-2124 office 505 599-2538 fax 505 320-2816 cell e-mail: <u>rseale@eprod.com</u>

Confidentiality Notice: This e-mail, including all attachments is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message. -- This email has been scanned by the Sybari - Antigen Email System.

Newspapers for Public Notice for MAPL Discharge Plans

Pump Station	Plan Number	County	Newspaper	City
Caprock	GW342	Lea	Hobbs News Sun	Hobbs
Edgewood	GW340	Santa Fe	Moriarity Mountain View Telegraph	Moriarity
Estancia	GW339	Torrance	Moriarity Mountain View Telegraph	Moriarity
Duran	GW336	Guadalupe	Roswell Daily Record	Roswell
Huerfano	GW335	San Juan	The Daily Times	Farmington
Kutz	GW334	San Juan	The Daily Times	Farmington
Lybrook	GW337	Rio Arriba	The Daily Times	Farmington
Mesa	GW338	Chaves	Roswell Daily Record	Roswell
San Luis	GW333	Sandoval	Rio Rancho Observer	Rio Rancho
San Ysidro	GW332	Sandoval	Rio Rancho Observer	Rio Rancho
White Lakes	GW341	Chaves	Roswell Daily Record	Roswell

Enterprise Products

P.O. Box 4324 Houston, T 2727 North Loop West Houston, Texa

Houston, Texas 77210-4324 Houston, Texas 77008-1044 713.880.6500 www.epplp.com

Return Receipt Requested 7005 1820 0000 7947 3702

Mr. Brad Jones Environmental Bureau New Mexico Energy Mineral and Natural Resources Department 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Discharge Plan Application/Discharge Plant Renewals

Dear Mr. Jones,

October 18, 2006

In compliance with New Mexico Water Quality Control Commission Regulation 20.6.2.3114 Fees enclosed please find a check in the amount of \$1,100.00 in payment for application filing fees for the following Mid-America Pipeline Company, LLC pump stations. The applications were submitted to your department on May 11, 2006.

	Pump Station Name	County	Discharge Plan Number
	Caprock	Lea County	GW-342 ~
ĺ	Edgewood	Santa Fe County	GW-340 -
	Estancia	Torrance County	GW-339-
	Duran	Guadalupe County	GW-336 -
SA	Huerfano	San Juan County	GW-335
0	CKulz Constant	San-Juan County	GW_3341
ĺ	Lybrook	Rio Arriba County	GW-337~
	Mesa	Chaves County	GW-338-
	San Luis	Sandoval County	GW-333-
ĺ	San Ysidro	Sandoval County	GW-332
	White Lakes	Chaves County	GW-341 -

Should you have questions or need additional information, please contact Ms. Runell Seale, Specialist-Environmental Permitting at 505/599-2124 or Mr. Clay Roesler, Manager-Environmental Permitting at 713/803-7917.

Yours trub

Shiver J. Nolan

ENTERPRISE PRODUCTS PARTNERS L.P. ENTERPRISE PRODUCTS OPERATING L.P.

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5 	SurfaceWater Quality Certification		652	34		2348	900000		, 19
11.	SUINCEVARIEL COMINY CERTITION		652 010	34		2348	900000	2349009	20
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n e Zez	Hazardous Weste Notifiers List		783	24	2500	9690 9690	900000	4969201	*23
36.	UST Maps		783	24	2500 2500	9696 0606	900000	4959202	
26	UST Owner's Update		783 783	24 24	2500 2500	9696 9696	000000	4989203	*25
28	Hazardous Waste Regulations		783	24 24	2500	9696 9696	900000 900000	4989205 4969207	*26
波	Radio logic Tech, Regulations		783	24	2500 2500	9696	900000	4969208	28
30	Superfund CERLIS List		783	24	2500	9696	900000	4989208	*28
	Solid Waste Permit Fees		783	24	2500	9696	900000	4808211	
32	Smoking School		783	24	2500	9696	900000	4969213	31
38	SWQB - NPS Publications		783 EB1	24	2500	9696	600000	4969222	
34	Radiation Licensing Regulation		183	24	2500	9696	900000	4969228	*33
35	Sale of Equipment		83	24	2500	8585	900000	4969301	*34
36	Sale of Automobile		83	24	2500	9695	900000	4969302	*35
37	Lusi Recoveries		83	24	2500	9698	900000	4969814	
38	Lust Repayments		83	24	2500	9696	900000	4969815	**37
39	Surface Water Publication		83	24	2500	9696	800000	4969801	30
40	Excon Resse Drive Ruidoso - CAF		83	24	2500	9695		4989242	40
11	Emerg. Hazardous Waste Penalties NOV		57	32	9600	1898	900000	4164032	41
12	Rediologic Tech. Certification		87	05	0500	1696		4169005	42
14	Ust Permit Fees		39	20	3100	1696		4169020	42
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Bross Receipt Tax Required - Site Name & Project Code Required TOTAL # 1/100 - TOTAL # 1/100 - TOTAL # 1/100 - CO eceived in ASD By: RT # ST#: Date:

F85025 Revised 07/07/00

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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ENTERPRISE*		16-OCT-0	
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Jones, Brad A., EMNRD

From:	Chavez, Carl J, EMNRD			
Sent:	Tuesday, September 19, 2006 1:50 PM			
	RSeale@eprod.com			
Cc	Jones, Brad A., EMNRD			
Subject:	FW: Renewal Discharge Plans			
Attachments:	Chavez, Carl J, EMNRD.vcf			

Ms. Seale:

Mr. Ed Martin was the permit writer, but has recently accepted another position in the Bureau. As you can see from the msgs. below, it appears that Mr. Brad Jones will take over for Mr. Martin and will be pulling the files to begin work on renewing discharge plans for Mid-America Pipeline Company, LLC.

Thank you for contacting the Oil Conservation Division and you may contact Mr. Brad Jones at (505) 476-3487 or via Brad's e-mail address above if you have question. Sincerely,

Carl J. Chavez, CHMM New Mexico Energy, Minerals & Natural Resources Dept. Oil Conservation Division, Environmental Bureau 1220South St. Francis Dr., Santa Fe, New Mexico 87505 Office: (505) 476-3491 Fax: (505) 476-3462 E-mail: <u>CarlJ.Chavez@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u> (Pollution Prevention Guidance is under "Publications")

From: Price, Wayne, EMNRD Sent: Tuesday, September 19, 2006 12:11 PM To: Chavez, Carl J, EMNRD; Jones, Brad A., EMNRD Cc: Martin, Ed, EMNRD Subject: RE: Renewal Discharge Plans

Brad, please go into RBDMS and change the reviewer name from Martin to Jones. When the new guy gets here I want us to inspect these facilities. Also please pull the files and determine what our next move is.

From: Chavez, Carl J, EMNRD Sent: Thursday, September 14, 2006 3:33 PM To: Price, Wayne, EMNRD Cc: Martin, Ed, EMNRD Subject: FW: Renewal Discharge Plans

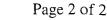
Wayne:

FYI. I am copying Ed Martin on this msg. I think she wants to know the status. Thnx.

Carl J. Chavez, CHMM New Mexico Energy, Minerals & Natural Resources Dept.

9/20/2006





Oil Conservation Division, Environmental Bureau 1220 South St. Francis Dr., Santa Fe, New Mexico 87505 Office: (505) 476-3491 Fax: (505) 476-3462 E-mail: <u>CarlJ.Chavez@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u> (Pollution Prevention Guidance is under "Publications")

From: Seale, Runell [mailto:RSeale@eprod.com] Sent: Thursday, September 14, 2006 3:14 PM To: Chavez, Carl J, EMNRD Subject: Renewal Discharge Plans

Hello Carl,

As we discussed today, I have listed the Discharge Plans we are awaiting approval upon. Would you please check on status of these renewals and let me know? Thanks for your assistance.

Mid-America Pipeline Company, LLC Renewal Discharge Plans were sent to Ed Martin, New Mexico Energy Minerals and Natural Resources Department, 1220 S. St. Francis Drive, Santa Fe, NM 87505 on May 11, 2006.

Awaiting approval from NM Energy, Minerals & Natural Resources Dept/Environmental Bureau-Santa Fe for the following:

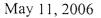
Caprock Pump Station Edgewood Pump Station Estancia Pump Station Duran Pump Station Huerfano Pump Station Kutz Pump Station Lybrook Pump Station Mesa Pump Station San Luis Pump Station San Ysidro Pump Station White Lakes Pump Station

GW342 GW340 GW339 GW336 GW335 GW334 GW337 GW338 GW333 GW332 GW341

Runell A. Seale

Environmental Specialist EPCO, Inc. (Enterprise Products Operating, LLP) 614 Reilly Ave. Farmington, NM 87401 505 599-2124 office 505 599-2538 fax 505 320-2816 cell e-mail: rseale@eprod.com





P.O. Box 4324 Houston, Texas 77210-4324 2727 North Loop West Houston, Texas 77008-1044 ww

713.880.6500 www.epptp.com

Return Receipt Requested 7003 1680 0005 0234 3578

Mr. Ed Martin Oil Conservation Division NEW MEXICO ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

RE: Discharge Plan Application/Discharge Plan Renewals -

Dear Mr. Martin:

Enclosed for your review and handling are the Discharge Plan Renewals for the following facilities:

Pump Station Name	County	OCD #	<u>EX R</u>
Caprock	Lea County	GW-342	4-10-06
Edgewood	Santa Fe County	GW-340	4-19-20
Estancia	Torrance County	GW-339	17
Duran	Guadalupe County	GW-336	5-8-56
Huerfano	San Juan County	GW-335	
Kutz	San Juan County	GW-334	1.1
Lybrook	Rio Arriba County	GW-337	11-16-26
Mesa	Chaves County	GW-338	and the state
San Luis	Sandoval County	GW-333	T = 8 = 1 = 1
San Ysidro	Sandoval County	GW-332	3.4
White Lakes	Chaves County	GW-341	4-13-04

Should you have questions or need additional information, please contact Mr. Donald Fernald, Environmental Scientist at 505/599-2141 or Mr. Alvaro Parro, Environmental Manager-Pipelines at 713/880-6957.

Yours truly

Shiver J. Nolan Senior Compliance Administrator

sjn/ras Enclosures Copy to: Denny Foust, NMOCD, Aztec

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER ENTERPRISE PRODUCTS OLPGP, INC., GENERAL PARTNER



NEW MEXICO ENERGY, MERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor Joanna Prukop Cabinet Secretary Mark E. Fesmire, P.E. Director Oil Conservation Division

December 22, 2005

Mr. Alvaro Parra Enterprise Products Operating, L.P. P.O. Box 4324 Houston, TX 77210-4324

RE: Discharge Permit Expirations

Dear Mr. Hurlburt:

The following discharge permits expire soon.

Permit Number	Facility	Expiration Date
CW 222	San Luis Dumm Station	May 9, 2006
GW-333	San Luis Pump Station	May 8, 2006
GW-336	Duran Pump Station	May 8, 2006
GW-335	Huerfano Pump Station	May 8, 2006
GW-334	Kutz Pump Station	May 8, 2006
GW-341	White Lakes Pump Station	April 19, 2006
GW-337	Lybrook Pump Station	April 16, 2006
GW-339	Estancia Pump Station	April 16, 2006
GW-338	Mesa Pump Station	April 13, 2006

Permit renewals should be submitted to the New Mexico Oil Conservation Division as soon as possible. Please address all future correspondence concerning these facilities to:

Ed Martin New Mexico Oil Conservation Division 1220 S. St. Francis Santa Fe, NM 87505

If you have any questions, contact me at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

& Marto

Edwin E. Martin Environmental Bureau

ENTERPRISE PRODUCTS OPERAT P.O. BOX 1788 ROCK SPRINGS, WY 82902-1788 307-362-2703





RECEIVED

AUG 2 8 2003

OIL CONSERVATION DIVISION

Mr. Jack Ford State of New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

RE: Transfer of Discharge Permits

Dear Mr. Ford:

Enterprise Products Company, L.P. is submitting this letter to notify NMOCD of the transfer for the OCD Discharge Plans listed below. On February 1, 2003 the owner remained as Mid-America Pipeline, however the operator changed from "The Williams Companies, Inc." to "Enterprise Products Operating, L.P".

Caprock	GW-342	Lybrook	GW-337
Duran	GW-336	Mesa	GW-338
Edgewood	GW-340	San Luis	GW-333
Estancia	GW-339	San Ysidro	GW-332
Huerfano	GW-335	White Lakes	GW-341
Kutz	GW-334		

Enterprise Products Operating, L.P agrees to abide by all commitments submitted in each of the above discharge plan renewal applications.

Please direct all future inquiries, regarding Discharge Plans to:

Enterprise Products Operating, L.P ATTN: Alvaro Parra PO Box 4324 Houston, TX 77210-4324 (713) 880-6957

Should you have any questions please call me at 307-362-2703 ext. 106.

Sincerely,

Lude M. Sugar

Linda Sugano Environmental Specialist

cc: Alvaro Parra, Enterprise



 Four Corners Area

 Environmental Department

 #188 CR 4900

 Bloomfield, N.M. 87413

 Phone:
 (505) 634-4956

 Fax:
 (505) 632-4781

RECEIVED

FEB 2 0 2002

Environmental Bureau Oil Conservation Division

February 18, 2002

Mr. Jack Ford State of New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Re: Drain Line Testing Results at Various Williams Field Services Facilities

Dear Mr. Ford:

WFS conducted a facility review and drain line testing in accordance to the Oil Conservation Division (OCD) Discharge Plan requirements. Subsurface, non-pressurized process and wastewater lines were tested. The facility drain line testing reports enclosed with this letter. A review and testing summary is provided in the table below.

Facility	Permit #	Completion Date	Results	Comments
Huerfano NGL Pump Station	GW-335	10/9/2001	Passed	
Lybrook NGL Pump Station	GW-337	10/1/2001	Passed	
San LuisNGL Pump Station	GW-333	10/13/2001	Passed	
San YsidroNGL Pump Station	GW-332	10/14/2001	Passed	
Edgewood NGL Pump Station	GW-340	10/16/2001	Passed	
Estancia NGL Pump Station	GW-339	10/20/2001	Passed	· · · · · · · · · · · · · · · · · · ·
Duran NGL Pump Station	GW-336	10/21/2001	Passed	
Mesa NGL Pump Station	GW-338	10/29/2001	Passed	
White Lakes NGL Pump Station	GW-341	12/5/2001	Passed	
Caprock NGL Pump Station	GW-342	12/6/2001	Passed	

If you have any questions or require additional information, I can be reached at (505) 634-4956.

Sincerely,

Ethel Holiday **G** Environmental Compliance Specialist

Attachments: Drain Line Testing Reports

Xc: Denny Foust, Aztec OCD

HIPP CONFIG.



December 21, 2001 AMEC Project No. 1-517-000089

Mr. Mark Bareta Williams Field Services 188 CR 4900 Bloomfield, New Mexico 87413

RE: Drain Line Testing Williams Field Services Huerfano NGL Pump Station San Juan County, New Mexico

Dear Mr. Bareta,

AMEC Earth & Environmental, Inc. (AMEC) is pleased to provide Williams Field Services (WFS) with results of hydrostatic testing for the subsurface, non-pressurized, process and wastewater drain system at the WFS Huerfano NGL Pump Station located in rural San Juan County, New Mexico. Only subsurface, non-pressurized process and wastewater lines were tested according to the facilities' Oil Conservation Division (OCD) Ground Water Discharge Plan requirements.

AMEC mobilized to the site and began drain line testing activities on October 29, 2001. The work was completed on November 9, 2001. AMEC's on-site crew consisted of Bruce Hare (Site Supervisor) and a 3-man field crew.

The underground pipelines carrying process or wastewater were isolated. Each isolated system was filled with clean water and air was removed. A water-filled riser of sufficient height was used to provide a minimum of 3 pounds per square inch above normal operating pressure (all risers were at least 8-feet in height). A system was considered passing or non-leaking when the height of the water column held steady for a period of 60 minutes. Any leaks encountered were repaired and the system was re-tested until the passing criteria described above was met.

Details of each drain line tested are summarized in the attached Pressure Test Reports.

In keeping with WFS's policy, along with AMEC's own internal Health and Safety policies, AMEC's on-site employees attended daily safety meetings.

AMEC Earth & Environmental, Inc. 2060 Afton Place Farmington, New Mexico, USA Tel 1+505-327-7928 Fax 1+505-326-5721

www.amec.com

Williams Field Services Drain Line Testing-Huerfano NGL Pump Station Phase 6, Task 22 December 21, 2001



AMEC appreciates the opportunity to perform these services at the Huerfano NGL Pump Station for WFS. Should you have any questions, please feel free to contact our office at 327-7928.

Respectfully submitted,

AMEC Earth & Environmental, Inc.

Robert Thompson Project Manager

Attachments: Daily Summary of Line Testing

Copies: Addressee (3)

Hydrostatic Line Testing Form



AMEC Project Numbe	er: 15170000 89 Client:	Williams Field Services
Task: <u> </u>	cility Name: <u>Huerfano</u>	Station
Test Description:	Hydrostat with	waten
	2", 3" + 4" pvc	
		3 PSI Test Date: 11-09-01
Test Requirements:	pipelines in accordance with Minerals, and Natural Resour Division Best Management F Perform a hydrostatic pressu	all underground process/wastewater the State of New Mexico, Energy, irces Department - Oil Conservation Practices minimum requirements. ire test on underground process/waste- per square inch for a period of one hour.

Test Data:

F

Start	Stop	Pressure	Pass/Fail	Lines Tested
9:00A	10:10A	91 "wc	PASS	Lines From Units #1,2,3,44 To
				Mainhine
				Lines from Dil Storage Berm To
				Main Lines
				Line From Gos Compresso + BENM TO
				main hines
				Line from Dehy, Berm To Mainhim Mainhine To Under ground Tank.
				Main Line To Under ground Tank.

Review and Approvals:

<u>10-09-01</u> Date Bruce Hare AMEC Representative Signature Bruce Hare Printed Name rris <u>9-0/</u> Date ee Client Représentative Signature Printed Name

AFFIDAVIT OF PUBLICATION

Ad No. 44251

STATE OF NEW MEXICO County of San Juan:

ALETHIA ROTHLISBERGER, being duly sworn says: That she is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES. a daily newspaper duly qualified for the purpose within the meeting of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Wednesday, April 4, 2001.

And the cost of the publication is \$111.97.

ON $\underline{\gamma}/\underline{6}/\underline{c}/$ ALETHIA ROTHLISBERGER appeared before me, whom I know personally to be the person who signed the above document.

My Commission Expires April 02, 2004

COPY OF PUBLICATION

Legals

NOTICE OF PUBLICATION

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

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

(GW-334) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Kutz Pump Station located in the SW/4 NW/4, Section 13, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. All effluents generated on site are collected in containment vessels prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidentai discharge is at a depth ranging from 420 to 450 feet with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

GW:335 Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Huerfano Pump Station located in the NW/4 SW/4, Section 21, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. All effluents generated on site are collected in containment vessels prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 500 to 1000 feet with a total dissolved solids concentrations ranging from 500 to 3000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 23rd day of March, 2001.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

918

LORI WROTENBERY, Director

Legal No. 44251, published in The Daily Times, Farmington, New Mexico, Wednesday, April 4, 2001.



Founded 1849

NEW MEXICO OIL CONSERVATION DIVISION ATTN: ED MARTIN 2040 S. PACHECO SANTA FE, NM 87505

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Conserva-tion Commission at Santa Fe, New Mexico, on this 23rd day of March, 2001.

STATE OF NEW MEXICO **OIL CONSERVATION** DIVISION

LORI-WROTENBERY, Director Legal #69098 Pub. April 5, 2001

AD NUMBER: 200140 ACCOUNT: 56689 LEGAL NO: 69098 P.O.#: 01199000033 1 time(s) at \$ 102.71 233 LINES AFFIDAVITS: 5.25 6.75 TAX: TOTAL: 114.71

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO COUNTY OF SANTA FE

I, <u>MM Weideman</u> being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication a copy of which is hereto attached was published #69098 in said newspaper 1 day(s) between 04/05/2001 and 04/05/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 5 day of April, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

Vlideman LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 5 day of April A.D., 2001

Briting Notarv Commission Expires

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01-2021 • 505·983·3303 • fax: 505·984·1785 • P.O. Box 2048, Santa Fe, NM 87504-2048

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 23rd day of March, 2001.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of che	ck No. date	d <u>2/.7/01</u> ,
or cash received on	in the amount of \$	500.00
from Williams Field Services Sanysidro Pump Station - Gue 33		
San 4310 ro Pumpo Station - Gev 333 for San 4415 P.S Giv -333 Kits P.S Gud-33	2 VHuertano RS GW-335 4 Duran P.S. GW-336	-
Submitted by:		23/01
	Date:	
Received in ASD by:	Date:	
Filing Fee 📝 New Facility	Renewal	
Modification Other		
(
Organization Code <u>521.07</u>	Applicable FY 200	<u>'/</u>
To be deposited in the Water Qualit	y Management Fund.	
Full Payment 1/ or Annual	Increment	

IS MULT-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

DATE: 02/07/2001

*****\$500.00

70-2322/719 A/C 9401076

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PAY TO THE ORDER OF:

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

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W. W.

SANTA FE United States Bank One, NA Illinois

MA1353 (10/99)

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PAY ->

Authorized Signer

Environmental Affairs 188 CR 4900 Bloomfield, NM 87413 505/634-4956

505/632-4781 Fax

February 16, 2001

Mr. Jack Ford New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe NM 87505

Re: Discharge Plan Application and Filing Fee for WFS Pump Stations

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application and check number 1000235782 for \$500.00 to cover the filling fee for the following Williams Field Services (WFS) Compressor Stations:

FRMATION SUL

- San Ysidro Pump Station
- Caprock Pump Station
- Huefano Pump Station
- Mesa Pump Station
- San Luis Pump Station
- Duran Pump Station
- Estancia Pump Station
- Lybrook Pump Station
- Edgewood Pump Station
- White Lakes Pump Station
- Kutz Pump Station

Williams Field Services appreciates your assistance in handling this application. If you have any questions or require additional information, please contact me at 505/634/4956.

Thank you,

Clara M Garcia ⁴ Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III Chris Williams, Hobbs, OCD Dist I Tim Gum, Artesia, OCD Dist I

District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 South First, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 District IV 2040 South Pacheco, Santa Fe, NM 87505	State of New Mexico Energy Minerals and Natural Resources Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505	Revised March 17, 1999 Submit Original Plus 1 Copy to Santa Fe 1 Copy to Appropriate District Office
GAS PLANTS. REFINERIES	APPLICATION FOR SERVICE C 5, COMPRESSOR, AND CRUDE O Guidelines for assistance in completing the app	
🗌 New	Renewal Modification	Distribution) GW^{-33}
1. Type: Crude Pump Station (Hu	erfano Pump Station)	,
2. Operator: Williams Field Service	es Company	
Address: 188 CR 4900, Bloom	ield, NM 87413	
Contact Person: Mark J. Bareta	Phone: (5	505) 632-4634
3. Location: <u>NW</u> /4 <u>SW</u> Submit la	/4 Section 21 Township rge scale topographic map showing exact location	26 N Range 10 W
4. Attach the name, telephone number an	nd address of the landowner of the facility site.	
5. Attach the description of the facility v	vith a diagram indicating location of fences, pits	, dikes and tanks on the facility.
6. Attach a description of all materials st	tored or used at the facility.	
 Attach a description of present source must be included. 	s of effluent and waste solids. Average quality	and daily volume of waste water
8. Attach a description of current liquid	and solid waste collection/treatment/disposal pro	ocedures.
9. Attach a description of proposed mod	ifications to existing collection/treatment/dispos	sal systems.
10. Attach a routine inspection and main	tenance plan to ensure permit compliance.	
11. Attach a contingency plan for reporti	ng and clean-up of spills or releases.	
12. Attach geological/hydrological inform	nation for the facility. Depth to and quality of g	ground water must be included.
13. Attach a facility closure plan, and oth rules, regulations and/or orders.	her information as is necessary to demonstrate co	ompliance with any other OCD
14. CERTIFICATION		
I hereby certify that the information and belief.	submitted with this application is true and correct.	ct to the best of my knowledge
Name: Mark J. Bareta		nvironmental Specialist
Signature: MJ/M	Date: 2	-/15/2001

DISCHARGE PLAN

WILLIAMS ENERGY SERVICES NATURAL GAS LIQUIDS PIPELINE SYSTEM HUERFANO PUMP STATION

Williams Energy Services

February 2001

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List of Figures - All figures follow Section XI

Figure 1 - Site Vicinity / Topographic Map Figure 2 - Facility Plot Plan

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List of Appendices

Appendix A – WES Spill Control Procedures Appendix B – NMOCD Notification of Fire, Breaks, Spills, Leaks, and Blowouts

I. <u>TYPE OF OPERATION</u>

The Huerfano Pump Station was built in 1980 to pump natural gas liquids along the Williams Natural Gas Liquids (NGL) Pipeline (formerly MAPCO).

II. LEGALLY RESPONSIBLE PARTY

Williams Energy Services (formerly MAPCO) 188 CR 4900 Bloomfield, NM 87413 (505) 632-4634

Contact Person: Mark J. Bareta, Senior Environmental Specialist Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Huerfano Pump Station is located in the NW/4 of SW/4 of Section 21, Township 26 North, Range 10 West, in San Juan County New Mexico, approximately 17.3 miles southeast of Bloomfield, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangle: Huerfano Trading Post, NW, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

IV. LANDOWNER

Williams Energy Services (WES) is leasing the subject property from:

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

Fce Schedule Based Fce Schedule Pump on Crude Pump Station

V. FACILITY DESCRIPTION

This facility is <u>classified asia pipeline pump</u>, <u>station and is unmanned</u>. The air permit for this site allows the operation of <u>four 1300 up Solar turbines</u>. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

VI. SOURCE, QUANTITY, AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

The source, quantity, and quality of effluent and waste solids generated at the compressor station are summarized in Table 1.

TABLE 1 SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS HUERFANO PUMP STATION

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Engine	200-400 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Engine	4-8 filters/year/engine	No additives
Wash-down Water	Engine Skidland Barrel -	1000-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Used Process Filters	Air, Inlet and Fuel Gas	75-100/year	No additives
Empty Barrels	Liquid Containers	20-40/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

Used oil filters have been collected from representative NGL pump stations and analyzed for TCLP Metals. The results of the analysis found that the filters did not exceed TCLP concentrations for metals. The analyses were submitted to the disposal facility along with the Waste Acceptance Profiles. These profiles are updated every two years or as required by the disposal facility.

VII. TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND WASTE SOLIDS

Wastes generated at this facility fall into the non-exempt category. Waste management will be conducted as outlined in Table 2. Non-exempt waste management will be conducted in accordance with NMOCD requirements including the preparation of a Certificate of Waste Status for each non-exempt waste stream.

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

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

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

 TABLE 2

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

 HUERFANO PUMP STATION

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil Filters	Drum or other container	Varies	Transported to a WES or contractor facility in drum or other container	Non-exempt	Transported to a WES or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the facility. Recycling options may be considered when available.
Wash-down Water	Below ground Tank vaulted	1550 gallons	Tank set in concrete containment	Non-exempt	Wash-down water will be transported to NMOCD-approved facility; or evaporation at WES facility may be considered in future.
Used Process Filters	Drum or other container	Varies	Transported to a WES or contractor facility in drum or other container	Non-exempt	Transported to a WES or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the 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 WES or contractor consolidation point and ultimately recycled/disposed.
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land-farm, or alternate method	Non-exempt	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 WES or contractor facility in drum or other container	Non-exempt	Transported to a WES or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the facility. Recycling options may be considered when available.
Methanol	Drum	55 gallons	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above ground storage tanks	300 gallons 35 gallons	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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VIII. 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, identification of personnel responsible for implementation, inspection and maintenance of the pollutant controls, and gives a description of structural controls to prevent storm water pollution.

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.

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.

IX. INSPECTION, MAINTENANCE AND REPORTING

WES and/or contract personnel will operate and maintain the pumping units at the facility. The facility will be monitored remotely for equipment malfunctions through NGL Pipeline Control and by regular site visits. The facility will be visited several times per week at a minimum, and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year.

In the event of a release of a reportable quantity, the operator reports the release to NGL Pipeline Control who immediately notifies the WES Environmental Affairs Department. WES Environmental Affairs then reports the release to the appropriate agencies. Records of spills, leaks, or other pollutant discharges, if any, and inspections and maintenance activities will be maintained by WES for at least one year at area offices.

X. SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Spill containment berms around above ground storage tanks will be designed to contain 1-1/3 times the volume of the tank. The below-grade tanks will be constructed with a means of leak detection, and will either be double-bottomed tanks or a tank set on an impermeable pad.

WES corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided 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).

XI. SITE CHARACTERISTICS

The Huerfano Pump Station is located approximately 17.3 miles southeast of Bloomfield, New Mexico. The site elevation is approximately 6,520 feet above mean sea level. The natural ground surface topography slopes downward toward the west-northwest. The maximum relief over the site is approximately 10 feet.

Intermittent flow from the site will follow the unnamed drainage towards the west. The unnamed drainage meets the Gallegos Canyon wash approximately 7.5 miles west of the site. Gallegos Wash drains approximately 14.7 miles north into the San Juan River. The San Juan River, at approximately 5,300 feet in elevation, is the nearest down-gradient perennial source of surface water to the site.

A review of the available hydrologic data^{1,2,3} for this area revealed that there are no water wells within a 1/4-mile radius of the Huerfano Pump Station. The Nacimiento Formation is the waterbearing unit underlying the site. This formation consists of a sequence of interbedded sandstone and mudstone. Ground water depth at the site is estimated to be 500 to 1,000 feet below the surface. The total dissolved solids concentration of area ground water ranges from 500 to 3,000 parts permittion.

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

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

References

¹Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

²Online Climate Information, Western Regional Climate Center, 2000

³Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2000.

XII. FACILITY CLOSURE PLAN

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



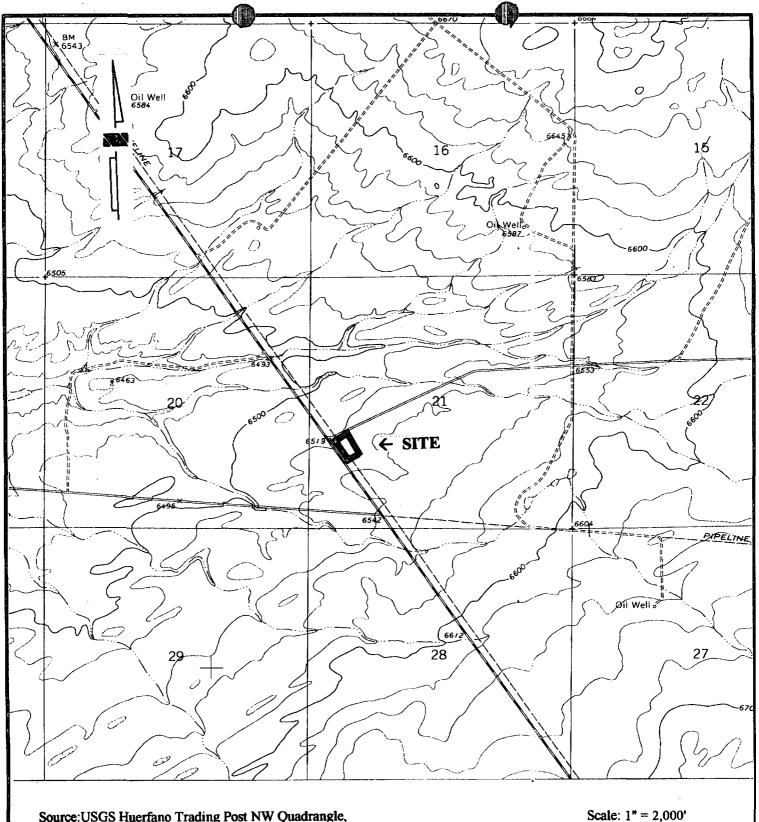


FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLOT PLAN



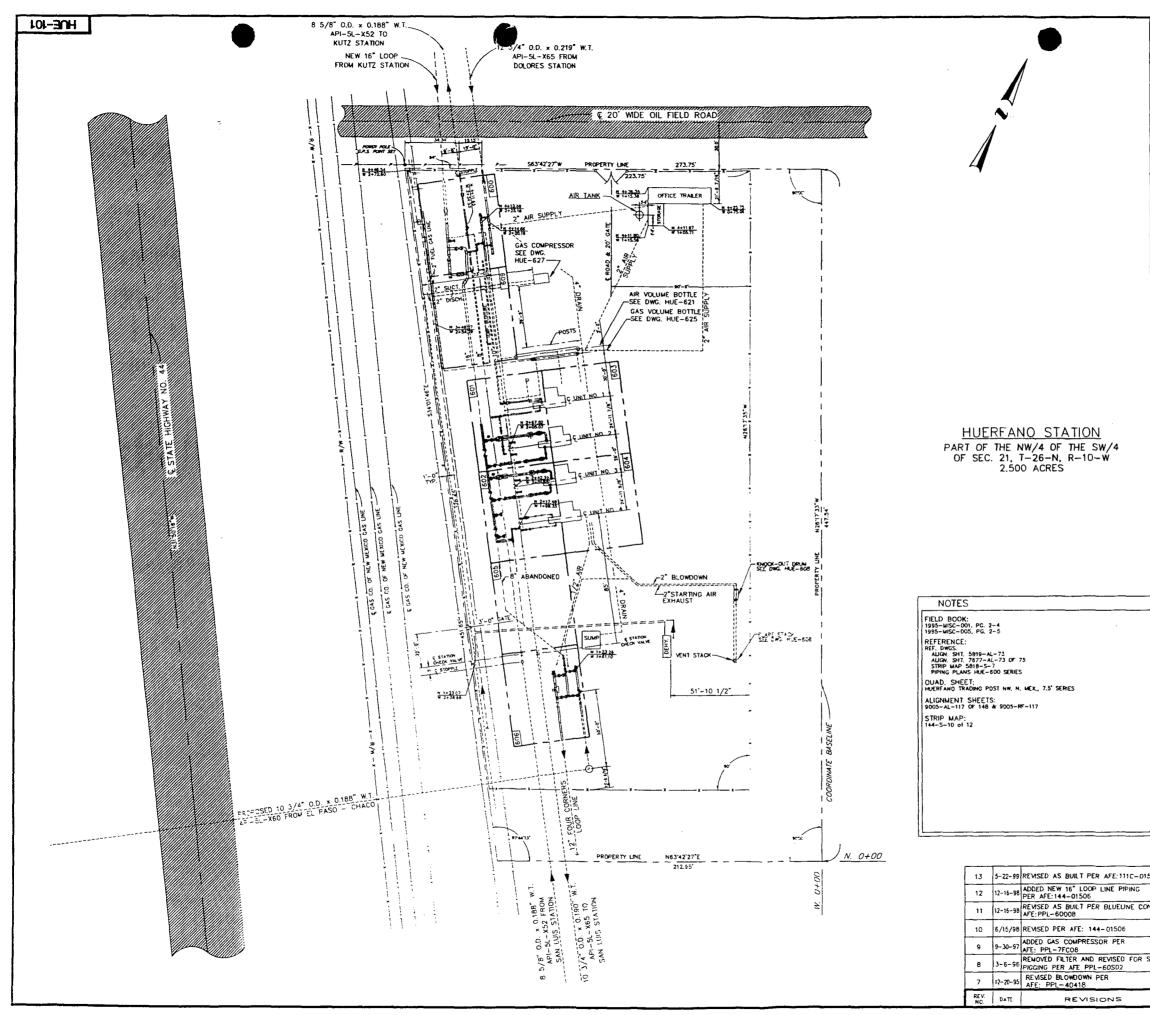
Source: USGS Huerfano Trading Post NW Quadrangle, New Mexico

Willams

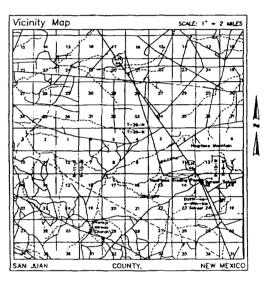
Figure 1 Site Vicinity / Topographic Map Huerfano Pump Station

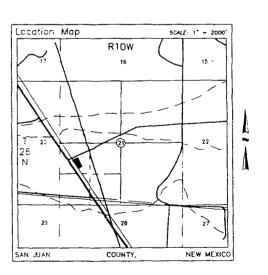
Section 21, Township 26N Range 10W San Juan County, New Mexico

AT WEITED



BILL OF ATERIAL						
пен на.	QUANT.	DESCRIPTION	SALV.	NEW.		
1	1028'	FENCE, 6' x 11 GA. x 2" CHAINLINK MESH W/TOP BRACKET (45' OUT)				
		& 3 STRANDS OF BARBED WIRE, C/W TOP RAIL, CORNER, LINE & GATE				
		POSTS, ALL BRACES & ERECTION HARDWARE. ALL MAT'L. GALVANIZED				
2	1	GATE, 20' DEL. SWG., CYCLONE "INVINCIBLE" OR EQUAL				
3	1	GATE, 3' x 7' TALL SINGLE SWG., CYCLONE "INVINCIBLE" OR EQUAL				
4	115	PIPE, 2 3/6" 0.0. x .154" WT., API-5L-GR.B				
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APPENDIX A

SPILL CONTROL PROCEDURES

14

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	Reference (Book Title) Operations/Maintenance Field Services	Task/Document No. 21.10.020
Williams	Section General/Safety	Regulation No./Reference
	Subject Discharges or Spills of Oil or Hazardous Substances; Preventing, Controlling and Reporting of	Effective Date 12/15/99

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Document History (ISO9001)

Document Body

1.0 PURPOSE AND SCOPE

- 1.1 To establish the policy and procedure for preventing, controlling and reporting of discharges or spills of oil or hazardous substances to the environment in accordance with Company practices and federal, state and local requirements, including Title 40 of the Code of Federal Regulations Part 112 (Oil Pollution Prevention).
- 1.2 This document pertains to Company personnel, Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

2.0 CONTENTS

3.0 POLICY

3.1 GENERAL

- 3.1.1 All Company facilities which could discharge or spill, oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to, fish, shellfish, wildlife, shorelines and beaches are subject to the provisions of this document.
- 3.1.2 Oil, for purpose of this document, means oil of any kind or in any form, including but not limited to petroleum hydrocarbon, fuel oil, Y grade, natural gas liquids, condensate, mixed products, sludge, oil refuse and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) is not considered to be oil.
- 3.1.3 Hazardous Substance, for purposes of this procedure, is defined as any chemical or

material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:

a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act

c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)

d. Section 112 of the Clean Air Act

e. Section 7 of the Toxic Substance Control Act

- 3.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- 3.1.5 Facilities which could discharge or spill, oil or hazardous substances into a watercourse must comply with the applicable federal, state or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake or standing body of water capable of collecting or transporting an oil or hazardous substance.
- 3.1.6 Facilities which are subject to the requirements stated in this policy are as follows:

a. Non-Transportation Related Facilities

(1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.

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

b. Transportation Related Facilities

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

- 3.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all oil and hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.
- 3.1.8 The facility superintendent is responsible for spill prevention. His/her duties include,

but are not limited to, the following:

a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.

b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.

c. Briefings should highlight and describe known discharges or spills and recently developed precautionary measures.

3.1.9 Each individual facility is checked annually by the superintendent or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:

a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.

b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.

c. An annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.

3.1.10 Any field drainage ditches, road ditches, traps, sumps or skimmers should be inspected at regular scheduled intervals for accumulation of oil or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

3.2 BULK STORAGE TANKS

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

3.3 FACILITY DRAINAGE

- 3.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from diked areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.
- 3.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.
- 3.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.
- 3.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:

a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation or displacement by foreign materials.

b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.

c. Any dike three feet or higher should have a minimum cross section of two feet at the top.

Other means of containment or spill control include, but are not limited to:

3.3.5

- a. Berms or retaining walls
- b. Curbing
- c. Culverting, gutters or other drainage systems
- d. Weirs, booms or other barriers
- e. Spill diversion ponds or retention ponds
- f. Sorbent materials

3.4 TRANSFER OPERATIONS, PUMPING and IN-PLANT/STATION PROCESS

3.4.1 Aboveground valves and pipelines should be examined regularly by operating

personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks and metal surfaces.

3.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

- 3.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.
- 3.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- 3.5.3 Loading and unloading a reas should be provided with an interlocked warning light, grounding shutdown, physical barrier system or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets that may allow leakage should be tightened, adjusted or replaced to prevent liquid leakage while in transit.

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

4.0 **PROCEDURE**

4.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of Oil or Hazardous Substance Any Employee

- 4.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity shall immediately contain the release (if safe to do so) and notify the facility superintendent, dispatcher or other designee. Releases must be reported to gas control in the following three circumstances:
 - I. The Following Situations Always Require IMMEDIATE Reporting to Gas Control:
 - 1. Release reaches or may reach surface water: (pond, lake, wash or ground water
 - 2. Release leaves Williams property
 - 3. Release is of questionable nature (i.e., unknown product, unknown hazards)

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

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

- Ammonia
- Antifreeze
- Amine

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

III. Releases of Certain Other Materials Reportable:

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

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

NOTE 1: A release includes material released (intentionally or unintentionally) to air, water or soil. When notifying Gas Control of a Release, be prepared to provide information on the type of material spilled, amount released, weather conditions, time and date of release, person discovering release and measures taken to control the release.

NOTE 2: Refer to Attachment A for containment procedures. **Facility Superintendent, Controller or Designee**

4.1.2 Contacts Gas Control immediately by telephone and provides the following information:

a. Name of company facility and/or location of facility and nature of discharge or spill

b. Description and quantity of emission or substance discharged

c. Description of the circumstances causing the discharge or spill

d. Name, title and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control

e. Action taken or being taken to mitigate and correct discharge or spill

f. Water bodies or streams involved

g. Time and duration of discharge or spill

h. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals) Gas Control Personnel

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

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

4.1.4 If Environmental Affairs cannot be contacted, notifies Director over Environmental Affairs.

Facility Superintendent

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

Environmental Affairs

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

4.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL Facility Superintendent or Designee

- 4.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:
 - a. Time and date of discharge or spill
 - b. Facility name and location
 - c. Type of material spilled
 - d. Quantity of material spilled

- e. Area affected
- f. Cause of spill
- g. Special circumstances
- h. Corrective measures taken
- i. Description of repairs made
- j. Preventative measures taken to prevent recurrence.
- 4.2.2 Forwards the completed written description to Environmental Affairs. Retains a copy for future reference.

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

DISCHARGE OR SPIL	L CONTAINMENT PROCEDU	RES AND MATERIALS
TYPE OF FACILITY WHERE THE DISCHARGE OR SPILL OCCURS	PROCEDURES	MATERIALS USED FOR CONTAINMENT
A. Oil Pipeline (as defined in C.1.4)	 Closes appropriate block valves. Contains Discharge or spill by: Ditching covering, applying sorbents, constructing an earthen dam or burning. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. 	7.Sorb-Oil Mats Banta Co.
B. Vehicle	 Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, apply sorbents or burning. Notifies immediately Environmental Affairs and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials. 	

ATTACHMENT A DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS

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	3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	
	Note : Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.	
C. Bulk Storage Tanks or any other Facilities	1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam or burning.	
	2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	

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If you have questions, suggestions, comments or concerns regarding the SETS Library, please contact <u>Documentation Services</u>.

APPENDIX B

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

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505 Form C-141 Revised March 17, 1999

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

Release Notificatio	n and Correctiv	e Action
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	OPERATOR	Initial Report Final Report
Name of Company	Contact	
Address	Telephone No.	
Facility Name	Facility Type	
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
1								

NATURE O	F RELEASE		
ype of Release	Volume of Release	Volume Recov	vered
ource of Relcase	Date and Hour of Occurrence	Date and Hou	r of Discovery
Vas Immediate Notice Given?	If YES, To Whom?	L	
3y Whom?	Date and Hour		
Was a Watercourse Reached?	If YES, Volume Impacting the Wa	itercourse.	
If a Watercourse was Impacted, Describe Fully.*	<u> </u>		
ж. С			
Describe Cause of Problem and Remedial Action Taken.*			
Describe Area Affected and Cleanup Action Taken.*	<u> </u>		
I hereby certify that the information given above is true and complete to and regulations all operators are required to report and/or file certain rele			
endanger public health or the environment. The acceptance of a C-141 r	eport by the NMOCD marked as "Fin	nal Report" does no	ot relieve the operato
of liability should their operations have failed to adequately investigate a water, human health or the environment. In addition, NMOCD acceptant			
compliance with any other federal, state, or local laws and/or regulations		nie operator or rea	ponsionity to
	OIL CONSER	VATION DIV	ISION
Signature:			
Printed Name:	Approved by District Supervisor:		
Title:	Approval Date:	Expiration E	Date:
Date: Phone:	Conditions of Approval:		Attached

* Attach Additional Sheets If Necessary

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NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131

February 24, 2000

CERTIFIED MAIL RETURN RECEIPT NO. Z-142-564-948

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

RE: Discharge Plan Requirement Williams Field Services (formerly MAPCO) Huerfano Pump Station San Juan County, New Mexico

Dear Ms. Deklau:

Under the provisions of the New Mexico Water Quality Control Commission (WQCC) Regulations, Williams Field Services, Inc. is hereby notified that the filing of a discharge plan is required for the Williams Field Services, Inc. (formerly MAPCO) Huerfano Pump Station located in Section 21, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico.

This facility was incorporated with a number of other pump stations under a discharge permit, GW-836, issued by the New Mexico Environment Department (NMED) to Mid-America Pipeline Company (MAPCO). Discharge plan GW-836 expired April 24, 1999. The NMED and the OCD made the determination that the Oil Conservation Division has jurisdiction over the environmental regulation of the MAPCO pipeline system and its ancillary facilities. With the notification by Williams Field Services, Inc. of the acquisition of assets by Williams, Inc. of the MAPCO liquid petroleum pipeline system an inspection of the facilities was performed by the OCD to determine if a single discharge plan would be adequate for this pipeline system and its pump station facilities. Subsequent to an inspection and evaluation of the facility it has been determined that a discharge plan will be required for the above captioned pump station.

This notification of discharge plan requirement is pursuant to Part 3104 and Part 3106 of the WQCC Regulations. The discharge plan, defined in Part 1101.N. of the WQCC Regulations, should cover all discharges of effluent or leachate at the facility or adjacent to the facility site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in below grade sumps, buried underground process tanks and/or piping), and closure plans for any pits or ponds whose use will be discontinued.

Ms. Ingrid Deklau February 24, 2000 Page 2



Enclosed is an application form for the above named facility. Two copies of your discharge plan application should be submitted to the OCD Santa Fe Office and one copy to the Aztec District Office for review purposes.

Section 3106 of the regulations requires a submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Part 3106 also allows the discharge to continue without an approved discharge plan until 240 days after written notification by the Director of the OCD that a discharge plan is required. An extension of this time period may be sought and approved for good cause.

Pursuant to the New Mexico Water Quality Control Commission (WQCC) Regulation 3114 "every billable facility submitting a discharge plan for approval, modification or renewal shall pay the fees specified in this section to the Water Quality Management Fund". WQCC Rule 3114 became effective as of August 18, 1991, and is found on page 38 of the WQCC Rules and Regulations.

Every billable facility submitting a new discharge plan will be assessed a fee equal to the filing fee plus either a flat fee or discharge fee. The filing fee is fifty (\$50) dollars and shall be submitted with the discharge plan application (nonrefundable). The remainder of the "total fee" for pump stations falls under the "flat fee" category. Please submit all checks to the OCD Santa Fe office and payable to the NMED-Water Quality Management.

If there are any questions on this matter, please feel free to contact Mr. W. Jack Ford at (505) 827-7156 as he is assigned responsibility for review of service facility discharge plans.

Sincerely,

Roger C. Anderson Oil Conservation Division

cc: OCD Aztec District Office

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13800, April 1995	Return Receipt Showing to Whom, Date, & Addressee's Address							
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