GW – 364

PERMITS, RENEWALS, & MODS Application

Environmental Department
188 County Road 4900
Bloomfield, NM 87413
(505) 634-4951
Fax (505) 632-4781

January 14, 2008

Mr. Leonard Lowe
New Mexico Oil Conservation Division
1220 S. St. Francis
Santa Fe. NM 87505

Dear Mr. Lowe:

Please find enclosed the signed Conditions of Approval, along with checks for the renewal fees for the following Discharge Permits:

Permit No.	Facility
GW-364	Bancos Compressor Station
GW-365	Eul Canyon Compressor Station

If you need any additional information, please call me at (505) 634-4951.

Sincerely yours,

David Bays

David Bays, REM
Sr. Environmental Specialist

cc: file 220

ATTACHMENT TO THE DISCHARGE PERMIT
WILLIAMS FOUR CORNERS, LLC, BANCOS COMPRESSOR STATION (GW-364)
DISCHARGE PERMIT APPROVAL CONDITIONS
JANUARY 8, 2008

Please remit a check for $1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
C/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. However, the owner/operator still owes the required $1700.00 renewal permit fee for a gas compressor station less than 1001 horsepower.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on January 01, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, 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. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its August 9, 2007 discharge plan newly submitted application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. **Class V Wells:** The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. **Housekeeping:** The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. **Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. **OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. **Storm Water:** The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. **Unauthorized Discharges:** The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: It is understood by the NMOCD that this facility is non operational and is currently in "idle" mode until Williams Four Corners decides to have the facility put back on line. Williams Four Corners shall verify that the site is considered "clean" with no environmental concerns at this time of renewal. If there are any concerns with the site (i.e. soil staining) then it should be address now. If the site is already "clean" then this

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.
Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: Williams Four Corners, LLC, (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Williams Four Corners, LLC

Company Name-print name above

David Bays

Company Representative- print name

David Bays

Company Representative- signature

Title Sr. Environmental Specialist

Date: 01/10/2008

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 1/11/08

or cash received on _____ in the amount of $ 1700 00

from Williams Four Corners

for GW-364

Submitted by: Lawrence Rancio Date: 1/17/08

Submitted to ASD by: Laurrini Romero Date: 1/17/08

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 7/30/07

or cash received on _____ in the amount of $ 100.00

from Williams Four Corners

for GW-364

Submitted by: Lawrence Romero Date: 8/8/07

Submitted to ASD by: Lawrence Romero Date: 8/8/07

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

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 OCD Guidelines for assistance in completing the application)

☒ New ☐ Renewal ☐ Modification

1. Type: Natural Gas Compressor Station (Bancos Compressor Station)
2. Operator: Williams Four Corners, LLC

   Address: 188 County Road 4900 Bloomfield, NM 87413

   Contact Person: David Bays Phone: (505) 634-4951
3. Location: NW/4 NE/4 Section 36 Township 32N Range 6W
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 daily quality and daily volume of waste water must be included.
8. Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.
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 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: Environmental Specialist

Signature: David Bays Date: August 1, 2008

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

Bancos Compressor Station

NMOCD
Discharge Plan

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

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1.0 TYPE OF OPERATION

The Bancos Compressor Station was built in 2006 to provide metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery through the Williams Four Corners LLC (Williams) system.

2.0 LEGALLY RESPONSIBLE PARTY

Williams Four Corners, LLC
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 Bancos Compressor Station is located in Section 36, Township 32 North, Range 6 West, in Rio Arriba County, New Mexico, approximately 34 miles east-northeast of Aztec, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangles: Bancos Mesa NW, 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 is leasing the subject property from:

Commissioner of Public Lands
State Land Office, Bldg 310
Old Santa Fe Trail
Santa Fe, NM 87410

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 of four 1,214-hp engines, one 1,041-hp engine, and five dehydrators. Currently, four engines and one dehydrator exist at the site. Compressors and dehydrators may be installed or removed to meet demand. 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.

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	4 @ 400 gal*	Concrete pad and wastewater system	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Condensate/Produced Water	Above Ground Storage Tank	2 @ 400 bbl	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.
Waste Water/ Wash-down Water	Below Grade Sump	90 bbl	Double-walled	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to any facility permitted by any state, federal, or tribal agency to receive industrial solid waste; or evaporation at Williams facility may be considered. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste.
Used Oil Filters	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Used Process Filters	Drum or other container	Varies	Transported in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Spill Residue (e.g., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non - exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Methanol	Above Ground Storage Tank	500 gal	Fiberglass berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	500 gal 400 gal	Metal berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	500 gal* 100 gal* 50 gal*	Metal berm Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	4 @ 500 gal*	Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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

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 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
Source, Quantity, and Quality of Effluent and Waste Solids

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

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. Storage 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 sumps 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).

11.0 SITE CHARACTERISTICS

The Bancos Compressor Station is located approximately 34 miles east-northeast of Aztec, New Mexico. The site elevation is approximately 6,660 feet above mean sea level. The natural ground surface topography slopes downward toward the south. Intermittent flow from the site will follow the unnamed drainage towards the south to Bancos Canyon. Approximately 7 miles southeast of the site, Bancos Canyon drains into Navajo Lake. Navajo Lake, at approximately 6,100 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 no water wells within a 1/2-mile radius of Bancos Compressor Station. The water-bearing unit in this area is the San Jose Formation. The San Jose Formation is the youngest Tertiary bedrock unit. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 100 to 500 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 PPM.

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

[1]Stone, 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.

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

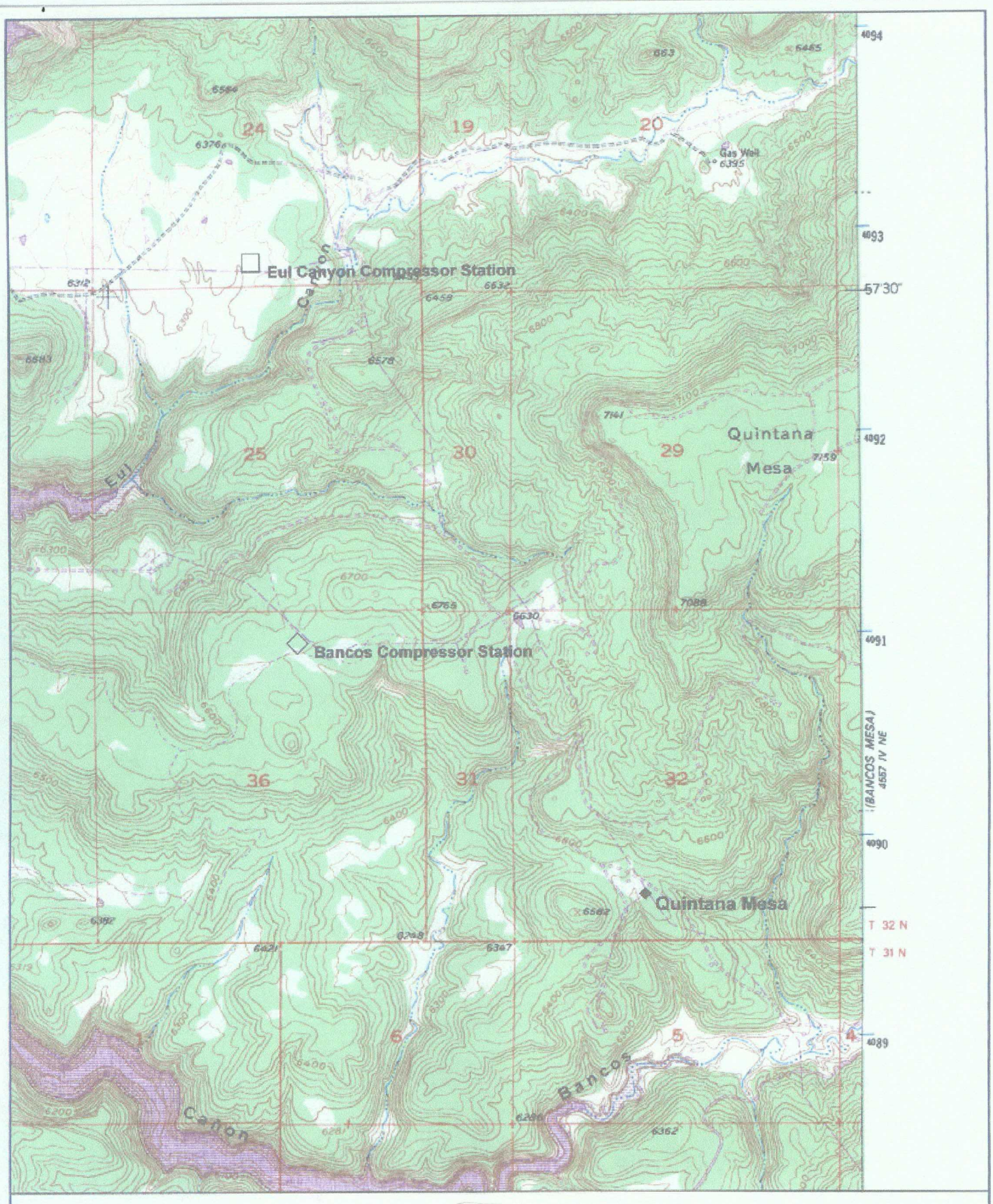
12.0 FACILITY CLOSURE PLAN

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.

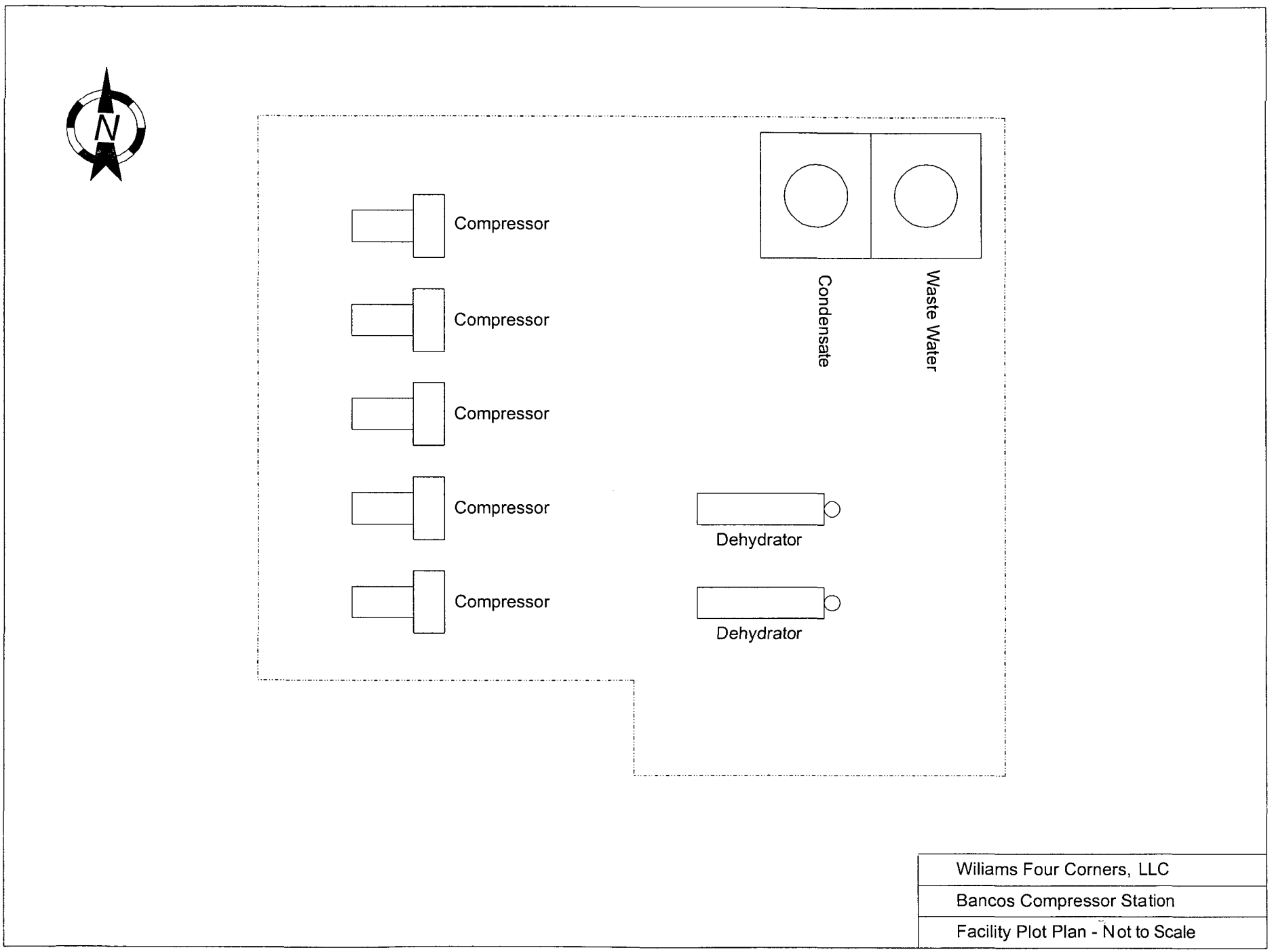
Generally, closure measures will include removal or closure in place of underground piping and other equipment. All wastes will be removed from the site and properly disposed in accordance with the rules and regulations in place at the time of closure. When all fluids, contaminants, and equipment have 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.

FIGURES



Name: BANCOS MESA NW
Date: 1/24/2005
Scale: 1 inch equals 2000 feet



Wiliams Four Corners, LLC
Bancos Compressor Station
Facility Plot Plan - Not to Scale

APPENDICES

APPENDIX A

WILLIAMS SPILL CONTROL PROCEDURES

Form WES-35

Release Report Form

Call 3E Company at 1-888-677-2370 to report all on-shore releases (suspected or confirmed)
Call O'Brien Oil Pollution Services at 1-985-781-0804 to report all off-shore releases (suspected or confirmed)

1 **This is a Williams Midstream or Williams Field Services Incident Notification**

2 Name and Title of Individual Reporting:

3 Call Back Phone number:

4 Is emergency assistance required, such as the Fire Department or Police?

5 Is this a Drill?

6 Is this a facility or Pipeline Release?

7 If Pipeline, is it in DOT Jurisdiction ?

8 What is the Name of the facility / Pipeline where the release occurred?

9 State of Release?

Area:

District:

Nearest City and State:

County / Parish:

Section: (or Latitude if off shore)

Township: (or Longitude if off shore)

Range:

Address of Contact:

10 Date Release Discovered?

11 Time Release Discovered?

12 a) Product Released:

Total Quantity Released and Units

Released as a Gas or Liquid?

If Liquid, What Quantity contained or Recovered?

Estimated Amount Recovered Soil:

Estimated Total Amount Recovered:

Other Products Released (If any):

13 If Liquid, was a stream or Waterway effected?

What is the name of the stream or water way

14 If Liquid, did the Release go outside the Facility Boundary?

15 Has the Release been Stopped or Contained?

16 If Stopped, What was the Stop Time of the Release?

17 What is the Source of the Release? (example: tank, valve, pipe)

(a) **INCIDENT SUMMARY:**

18 What is the Preliminary Pre-Investigation Cause? (Check all that apply)

Excavation Damage:	☐	**Intentional Blowdown:**	☐	**Equipment Failure:**	☐
Corrosion-Internal:	☐	**Incorrect Operation Operator:**	☐	**Third Party Damage:**	☐
Corrosion-External:	☐	**Incorrect Operation Contractor:**	☐	**Non-Maintenance:**	☐
Maintenance:	☐	**Other:**	☐	**Natural Forces:**	☐
Material or Weld Failure:	☐	**If Other Explain:**			

19 Weather Conditions (Check All that Apply):

Windy	☐	**Calm**	☐	**Raining**	☐
Hailing	☐	**Sleeting**	☐	**Snowing**	☐
Sunny	☐	**Cloudy**	☐		

If an offshore release meets the major incident criteria, call 3E immediately to report the major incident.

20 Anyone Hospitalized?

21 Significant Media Coverage?

22 Fatality?

23 Injury?

24 Fire?

25 Explosion?

26 Preliminary Loss Damage Estimate:

Last Revised: 7/14/06

Form WES-35

Release Report Form

Call 3E Company at 1-888-677-2370 to report all on-shore releases (suspected or confirmed)
Call O'Brien Oil Pollution Services at 1-985-781-0804 to report all off-shore releases (suspected or confirmed)

Is the release reportable based on the Release/Spill Matrix?	
Why Release is Reportable (enter determining factor from Matrix)	

Agencies Contacted:

	Date	Time	Name & Title	Number	City & State
NRC ☐					
SERC ☐					
LEPC ☐					
Other (Enter) ☐					

Additional Information:

District Supervisor:	
Safety Contact for this Release:	
Environmental Contact for this Release:	

Mitigation/Remediation Follow-Up

Last Revised: 7/14/06

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

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

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

2.0 PROCEDURE

2.1 Offshore Release Reporting

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

2.1.1.1 Any Release of oil to water.

2.1.2 OOPS will determine if the Release is reportable and immediately make the required telephonic notifications which include, but are not limited to notifying the National Response Center (NRC) and submit written reports to the appropriate regulatory agencies, the appropriate Qualified Individual (QI) and the Environmental Specialist

2.1.3 Immediately report to your Environmental Specialist and the Offshore Compliance Specialist the following type(s) of offshore Release(s) or event(s):

2.1.3.1 Any Gas Release >50 MSCF;

2.1.3.2 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;

2.1.3.3 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 ≥ $50,000;

2.1.3.4 Any unintentional, non-maintenance related Release ≥5 gallons of a Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;

2.1.3.5 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

2.1.3.6 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 2.1.3.1 through 2.1.3.5.

2.1.4 The Environmental Specialist and/or the Offshore Compliance Specialist will determine reportability and, if required, perform telephonic notifications in accordance with applicable regulations which include, but are not limited to notifying the NRC and subsequent additional agencies, if required, within prescribed timeframes.

2.1.5 The Environmental Specialist will complete the WES - 35 Release Report Form and forward to the Team Lead Environmental in Tulsa within 10 working days.

2.1.6 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.

2.1.7 The Offshore Compliance Specialist will complete any required follow-up written reports beyond the initial telephonic notifications given by either 3E Company or OOPS for DOT reportable events. Such follow up written reports must be submitted no later than 30 days of the event, or no later than 30 days of the date of discovery of the event on either Form 7100.2 - Incident Report - Gas Transmission and Gathering Systems or Form 7000-1 - Accident Report - Hazardous Liquid Pipeline Systems; as well as completing and additional documentation that may be required for transportation related events within regulatory timeframes and in accordance with the Telephonic and Written Release Reporting Requirements for the specific State in which the event occurred.

2.1.8 If additional information relative to the event is discovered after the initial final report, then such information shall be submitted on a supplemental report. If the event involved a Liquids line (49 CFR 195), then the supplemental report must be submitted within 30 days of discovering the additional information. If the event involved gas (49 CFR 192), the supplemental report must be submitted as soon as is practicable after the discovery of new information.

2.2 Onshore Releases

2.2.1 Immediately report to 3E Company at 888-677-2370 the following type(s) of onshore Release(s) or event(s):

2.2.1.1 Any Liquid Release that enters, or is expected to enter, any waterway (i.e., ditch, arroyo, intermittent stream, or any other body of water.);

2.2.1.2 Any individual Liquid Release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) >1 gallon;

2.2.1.3 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);

2.2.1.4 Any Gas Release >50 MSCF;

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

2.2.1.6 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 ≥ $50,000;

2.2.1.7 Any unintentional, non-maintenance related Release ≥5 gallons of a Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;

2.2.1.8 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

2.2.1.9 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 2.2.1.1 through 2.2.1.8.

NOTE

Releases that are completely contained within structures that have been designed for the purpose of containment must be reported to 3E if any of the above criteria are met. When 3E is informed that the Release was completely contained inside of a containment structure, 3E will not report the Release to any state or federal agency.

2.2.2 3E Company will immediately make the required telephonic notifications in accordance with the Telephonic and Written Release Reporting Requirements which includes, but is not limited to notification to the National Response Center (NRC).

2.2.3 Information that will be needed when reporting to 3E is on WES-35 - Release Report Form.

2.2.4 Refer to the Onshore Release/Spill Notification Flowchart for more information regarding the onshore reporting workflow.

2.2.5 The Environmental Specialist and/or DOT Compliance Specialist as appropriate, 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, 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).

2.3 Planned / Scheduled Blowdowns

2.3.1 Notify your Environmental Specialist as far as possible in advance of planned / scheduled blowdowns that are not an exception per 2.4 of this procedure.

2.3.2 Be prepared to provide to your Environmental Specialist a current extended chromatographic analysis of the product to be Released.

2.3.3 The Environmental Specialist will:

2.3.3.1 Review information provided;

2.3.3.2 Notify appropriate agencies;

2.3.3.3 Obtain required permits or permissions;

2.3.3.4 Provide Operations with any special conditions and/or limitations to be observed before, during, and/or after the planned/scheduled blowdown event; and

2.3.3.5 Perform any required post event reporting or follow-up to agencies.

2.4 Exceptions to Procedure:

2.4.1 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 and document using WES-87 - Record of Secondary Containment Discharges.

2.4.2 Routine Releases to Pollution Control Devices (flares, thermal oxidizers, etc.) in accordance with permit conditions or limitations.

2.4.3 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.

3.0 REFERENCES

3.1 Regulatory

3.1.1 49 CFR 191.5, 191.7 and 191.15

3.1.2 49 CFR 195.50, 195.52 and 195.54

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 Form 7100.2 - Incident Report - Gas Transmission and Gathering Systems

3.3.4 Form 7000-1 - Accident Report - Hazardous Liquid Pipeline Systems;

3.3.5 Telephonic and Written Release Reporting Requirements

3.3.6 WES-87 - Record of Secondary Containment Discharges

3.3.7 SIP Feedback/Change Request

4.0 DEFINITIONS

4.1 DOT jurisdictional Pipeline or Pipeline Facility – Pipeline or pipeline facility subject to 49 CFR Parts192 or 195.

4.2 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.

4.3 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.).

4.4 Hazardous Liquid – Petroleum, petroleum products, or anhydrous ammonia.

4.5 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).

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

4.7 Oil – As defined by the USCG list of petroleum and non-petroleum oils.

4.8 Onshore Release - Any Release that does not occur offshore in a Tidally Affected Zone.

4.9 **Tidally Affected Zone -** Relating to or affected by tides: the tidal maximum; tidal pools; tidal waters.

➢➢➢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.
2/27/06	2.1	Deleted "With Sheen On Water"
	2.1.1.1	Deleted "that causes sheen on water" to "of oil to water."
	2.2	Deleted "Offshore Release Reporting without sheen on water" Renumbered
	2.1.2	Added "determine if the Release is reportable and"
	2.2.1.1	Added "or any other body of water."
	4.5	New and renumbered
03/01/06	2.1.2	Added reference to National Response Center (NRC)
	2.1.4	Added reference to National Response Center (NRC)
	2.1.7	Clarified 30 day follow up written requirements; added links to forms.
	2.1.8	New. Added to clarify supplemental reports.
	2.2.2	Added reference to National Response Center (NRC)
	3.3	Added links to DOT Gas and Liquid Forms
8-21-06	1.1	Note #2 Added "or other acceptable reporting procedure."
	Global	Changed "DOT Compliance Coordinator" to "Offshore Compliance Specialist" where appropriate.
	2.2.9 Note Box	New
	2.2.5	Added "and/or DOT Compliance Specialist as appropriate,"
	2.4.1	Added "and document using WES-87 - Record of Secondary Containment Discharges"
01/01/07	Global	Changed Release Report Database Compliance Specialist to Team Lead Environmental
	2.6	Deleted "Release Database 2.6.1 The Team Lead Environmental will maintain the Release database and update with follow-up information from 2.5.1.1 through 2.5.1.3 above."

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

3.2.3 6.04-ADM-002 - Release Reporting

3.2.4 6.04-ADM-003 – Plans Required for Facilities-Pipelines

3.2.5 SIP-ADM-12.01 - Emergency Response and Planning

3.3 Forms and Attachments

3.3.1 WES-87 – Record of Secondary Containment Discharge

3.3.2 WES-35 - Release Report Form

3.3.4 0019 – External Visual Tank Inspection

3.3.5 Spill Prevention Control and Countermeasure (SPCC) Plan

3.3.6 Facility Response Plan

3.3.7 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. Williams' definition of a release is contained in the Release Reporting Guidelines 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 SIP-ADM-7.15 - Aboveground Storage Tank Integrity Renumbered
	2.5	New Routine releases of storm water from containment areas shall be documented on WES-87 – Record of Secondary Containment Discharge. All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
	2.5	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 6.04-ADM-002 - Release Reporting 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. NOTE 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 6.04-ADM-002 - Release Reporting 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 his/her management team. 2.5.4 Receiving and reviewing the initial release report 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. 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. 2.5.4.3 Offshore releases: The ES will complete the WES-35 - Release Report Form and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt. 2.5.5 Receiving a final release report 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. 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. 2.5.6 Providing Follow-up Information on the Release 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.
	2.6 Note Box	Added See 6.04-ADM-003 – Plans Required for Facilities-Pipelines 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
7-26-05	Entire document	Rearranged, renumbered, rewrote to clarify responsibilities
	Note	Shortened to clarify
	4.0	Deleted definitions not associated with this procedure.

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.

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? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ 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.

Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
E-mail Address:	Conditions of Approval:	Attached ☐
Date: Phone:		

* Attach Additional Sheets If Necessary

APPENDIX C

PUBLIC NOTICE

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

June 5, 2007

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 is preparing to submit to the Oil Conservation Division a Discharge Plan application for the Bancos Compressor Station. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan application to the Oil Conservation Division during July 2007.

The facility, located in Section 36, Township 32 North, Range 6 West, Rio Arriba County, New Mexico, approximately 34 miles east-northeast of Aztec, provides natural gas compression and conditioning services.

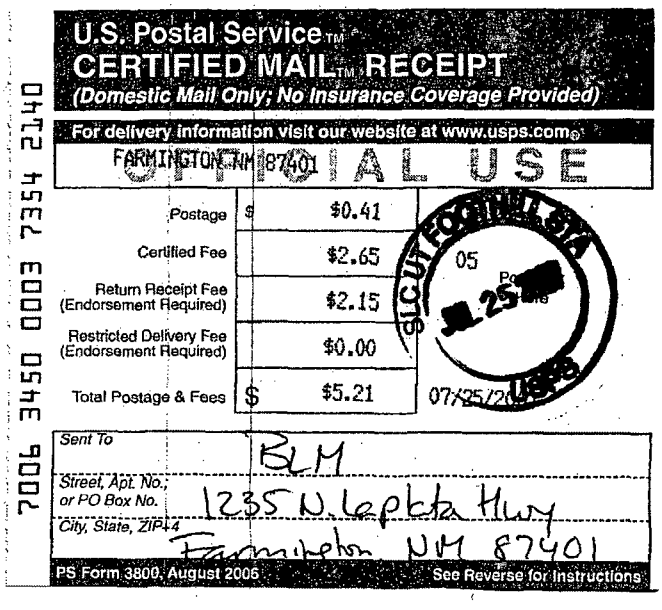
The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive industrial solid waste. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is 100 to 500 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,

Carol Harkins
EH&S Specialist



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

June 5, 2007

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Bureau of Reclamation
555 Broadway NE, Suite 100
Albuquerque, NM 87102-2352

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC is preparing to submit to the Oil Conservation Division a Discharge Plan application for the Bancos Compressor Station. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan application to the Oil Conservation Division during June 2007.

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Santa Fe NM 87505

Respectfully submitted,

Carol Harkins
EH&S Specialist

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

June 5, 2007

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

State of New Mexico
Commissioner of Public Lands
State Land Office, Bldg 310
Old Santa Fe Trail
Santa Fe, NM 87410

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC is preparing to submit to the Oil Conservation Division a Discharge Plan application for the Bancos Compressor Station. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan application to the Oil Conservation Division during June 2007.

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

Respectfully submitted,

Carol Harkins
EH&S Specialist

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SLS UT FOOTHILL STA 0012 JL 25 2007 05 Postmark Here
07/25/2007

Sent To: State of New Mexico - Comm. of Public Lands
Street, Apt. No.; or PO Box No.: State Land Office, Bldg 310
City, State, ZIP+4: Old Santa Fe Trail S.F. NM 87410

PS Form 3800, August 2006 See Reverse for Instructions