

**GW – 400**

**PERMITS,  
RENEWALS,  
& MODS  
Application**

## **Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Wednesday, October 28, 2009 3:01 PM  
**To:** 'Dailey, Aaron '  
**Cc:** Sandoval, Monica; 'Bays, David'  
**Subject:** NEW GW-400 Ojito CS, Admin. Complete  
**Attachments:** GW-400 Admin Complete Letter.pdf; GW-400 Draft Permit Cover.pdf; GW-400 Draft Permit.pdf; GW-400 OCD PN.pdf ,

Mr. Aaron Dailey

The OCD has determined your discharge plan application to be **administratively complete**.

Attached are documents pertaining to this.

OCD request that Williams Four Corners update their public notice to reference that the facility is processing a new discharge permit.

If you have any questions please do not hesitate to call me.

Thank you for your attention.

llowe

### **Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>



New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



October 28, 2009

Dear Mr. Dailey:

**Re: New Discharge Plan Permit GW-400  
Williams Four Corners  
Ojito Compressor Station  
Rio Arriba County, New Mexico**

The New Mexico Oil Conservation Division (NMOCD) has received Williams Four Corners LLC's, request and initial fee, dated October 9, 2009 for a new discharge permit for the Ojito compressor station located in SW/4 SW/4 of Section 7, NW/4 NW/4 of Section 7, 26 North, 3 West, Rio Arriba County, New Mexico. The Oil Conservation Division has identified this facility as GW - 400 for their discharge permit, please reference all future submitted documentation with this number. The initial submittal has provided the required information in order to deem the application "administratively" complete.

The New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC for a new discharge plan was satisfied and demonstrated to the NMOCD. Therefore each public notice must be approved by the OCD prior to the applicant posting them to the public. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us). On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Leonard Lowe  
Environmental Engineer

LRL/lrl

xc: OCD District III Office, Aztec





New Mexico Energy, Minerals and Natural Resources Department

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Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



October 28, 2009

Mr. Aaron Dailey  
Williams Four Corners, LLC  
188 CR 4900  
Bloomfield NM 87413

Re: **DRAFT** Discharge Permit Renewal GW-400 Ojito Compressor Station  
SW/4 SW/4 of Section 6, NW/4 NW/4 of Section 7, Township 26 North, Range 3 West,  
NMPM  
Rio Arriba County, New Mexico

Dear Mr. Dailey:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Williams Four Corners, LLC, (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed Attachment to the Discharge Permit. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us). 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,

Glenn von Gonten  
Acting Environmental Bureau Chief



## DISCHARGE PERMIT GW-400

### 1. GENERAL PROVISIONS.

**A. PERMITTEE AND PERMITTED FACILITY:** The Oil Conservation Division (OCD) of the Energy, Minerals and Natural Resources Department issues a new discharge permit GW-400 (Discharge Permit) to Williams Four Corners (Owner/Operator), located 188 CR 4900, Bloomfield NM 87413, to operate the Ojito Gas Compressor Station located in the SW/4 SW/4 of Section 6, NW/4 NW/4 of Section 7, Township 26 North, Range 3 West, NMPM, Rio Arriba County (Facility).

The facility provides metering and compression to various producers for the gathering of natural gas. The facility operates at total horsepower of 2400 HP. Approximately 600-8000 bbl/yr of produced water, 500-8000 bbl/year of condensate and 500 - 2000 gal/year/engine of used oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 25 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/L.

**B. SCOPE OF PERMIT:** OCD regulates the disposition of nondomestic wastes resulting from the oil field service industry to protect the public health and the environment pursuant to authority granted in the Oil and Gas Act (Chapter 70, Article 2 NMSA 1978) at NMSA 1978, Section 70-2-12(B)(22). OCD has been granted authority to administer the Water Quality Act (Chapter 74, Article 6 NMSA 1978) as it applies to the oil and field service industry by statute, NMSA 1978, Section 70-2-12(B)(22), and by delegation from the Water Quality Control Commission pursuant to NMSA 1978, Section 74-6-4(E).

The Water Quality Act and the rules issued under that Act protect ground water and surface water of the State of New Mexico by providing that, unless otherwise allowed by rule, no person shall cause or allow effluent or leachate to discharge so that it may move directly or indirectly into ground water unless such discharge is pursuant to an approved discharge plan. See 20.6.2.3104 NMAC and 20.6.2.3106 NMAC. A facility having no intentional liquid discharges is still required to have a discharge plan. Inadvertent discharges of liquids (*e.g.*, leaks and spills, or any type of accidental discharge of contaminants) or improper disposal of waste solids still have a potential to cause ground water contamination or threaten public health and the environment.

Because the Owner/Operator did not identify any intentional discharge that will occur at the Facility, this Discharge Permit does not authorize any discharge. This Discharge Permit addresses the protection of public health and the environment, and the prevention of water pollution, by preventing and mitigating unintentional discharges.

This Discharge Permit does not convey any property rights of any sort or any exclusive privilege, and does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of state, federal or local laws, rules or regulations.

**C. DISCHARGE PERMIT CONDITIONS:** By agreeing to this Discharge Permit, the Owner/Operator agrees to the specific provisions set out in this document, and the commitments made in the approved Discharge Plan Application and the attachments to that application, which are incorporated into the Discharge Permit by reference. Subsequent modifications of this Discharge Permit pursuant to the Water Quality Act, and subsequent approvals granted by OCD under this Discharge Permit are incorporated into the Discharge Permit, and the Owner/Operator agrees to the provisions in those subsequent modifications and approvals.

If this Discharge Permit is a permit renewal, it replaces the permit being renewed. Replacement of a prior permit does not relieve the Owner/Operator of its responsibility to comply with the terms of that prior permit while that permit was in effect.

**D. DEFINITIONS:** Terms not specifically defined in this Discharge Permit shall have the same meanings as those in the Water Quality Act, the Oil and Gas Act or the rules adopted pursuant to those Acts, as the context requires.

**E. GENERAL PERFORMANCE STANDARDS:** The Owner/Operator shall operate in accordance with the Discharge Permit conditions to comply with the Water Quality Act and the Oil and Gas Act and the rules issued pursuant to those Acts, so that neither a hazard to public health nor undue risk to property will result (see 20.6.2.3109.C NMAC); so that no discharge will cause or may cause any stream standard to be violated (see 20.6.2.3109.H(2) NMAC); so that no discharge of any water contaminant will result in a hazard to public health, (see 20.6.2.3109.H(3) NMAC); so that the numerical standards specified of 20.6.2.3103 NMAC are not exceeded; to protect public health and the environment (see NMSA 1978, Section 70-2-12(B)(22)); and to prevent waste of oil and gas, prevent the contamination of fresh waters and so that oil and gas are not used wastefully or allowed to leak or escape from a natural reservoir or from wells, tanks, containers, pipe or other storage conduit or operating equipment. See 19.15.2.8 NMAC.

The Owner/Operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards specified at 20.6.2.3101 NMAC and 20.6.2.3103 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams).

**F. FILING FEES AND PERMIT FEES:** Pursuant to 20.6.2.3114 NMAC, every facility that submits a discharge permit application for initial approval or renewal shall pay the permit fees specified in Table 1 and the filing fee specified in Table 2 of 20.6.2.3114 NMAC. The OCD has already received the required \$100.00 filing fee for this application. The flat fee for a compressor station operating greater than 1001 HP is \$1700.00. The Owner/Operator shall submit this amount along with the signed Discharge Permit. Checks should be made out to the "New Mexico Water Quality Management Fund," not the Oil Conservation Division.

**G. EFFECTIVE DATE, EXPIRATION, RENEWAL CONDITIONS, AND PENALTIES FOR OPERATING WITHOUT A DISCHARGE PERMIT:** This Discharge Permit is effective when the OCD receives the signed Discharge Permit from the

Owner/Operator, and the \$1700.00 fee. This Discharge Permit will expire on **Month, day, year**. The Owner/Operator shall submit an application for renewal no later than 120 calendar days before that expiration date, pursuant to 20.6.2.3106.F NMAC. If an Owner/Operator submits a renewal application at least 120 calendar days before the Discharge Permit expires and is in compliance with the approved Discharge Permit, then the existing Discharge Permit will not expire until OCD has approved or disapproved the renewal application. Operating with an expired Discharge Permit may subject the Owner/Operator to civil and/or criminal penalties. See NMSA 1978, Section 74-6-10.1 and NMSA 1978, Section 74-6-10.2.

**H. MODIFICATIONS:** The Owner/Operator shall notify OCD of any facility expansion, production increase, or process modification that would result in any significant modification in the discharge of water contaminants. See 20.6.2.3107.C NMAC. OCD may require the Owner/Operator to submit a permit modification pursuant to 20.6.2.3109.E NMAC, and the OCD may modify or terminate a permit pursuant to NMSA 1978, Section 74-6-5(M) through (N).

**I. TRANSFER OF DISCHARGE PERMIT:** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of the Facility, the transferor shall notify the transferee in writing of the existence of the Discharge Permit, and shall deliver or send by certified mail to OCD a copy of such written notification, together with a certification or other proof that such notification has been received by the transferee pursuant to 20.6.2.3111 NMAC. Upon receipt of such notification, the transferee shall inquire into all of the provisions and requirements contained in the Discharge Permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in OCD's file or files concerning the Discharge Permit. Upon assuming either ownership or possession of the Facility the transferee shall have the same rights and responsibilities under the Discharge Permit as were applicable to the transferor. See 20.6.2.3111 NMAC.

The transferee (new owner/operator) shall provide the OCD with a signed original of the Discharge Permit.

Transfer of the ownership, control, or possession of the Facility does not relieve the transferor of responsibility or liability for any act or omission which occurred while the transferor owned, controlled or was in possession of the Facility. See 20.6.2.3111.E NMAC.

**J. CLOSURE PLAN AND FINANCIAL ASSURANCE:** The Owner/Operator shall notify OCD in writing 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 Discharge Permit, or upon request from OCD, the Owner/Operator shall submit a closure plan, modified closure plan, and/or provide adequate financial assurance. See 20.6.2.3107 NMAC.

**K. COMPLIANCE AND ENFORCEMENT:** If the Owner/Operator violates or is violating a condition of this Discharge Permit, the OCD may issue a compliance order requiring compliance immediately or within a specified time period, suspending or terminating this Discharge Permit, and/or assessing a civil penalty. See NMSA 1978, Section 74-6-10. OCD may

also commence a civil action in district court for appropriate relief, including injunctive relief. See NMSA 1978, Section 74-6-10(A)(2); NMSA 1978, Section 74-6-11. The Owner/Operator may be subject to criminal penalties for discharging a water contaminant without a discharge permit or in violation of a condition of a discharge permit; making any false material statement, representation, certification or omission of material fact in an application, record, report, plan or other document filed, submitted or required to be maintained under the Water Quality Act; falsifying, tampering with or rendering inaccurate any monitoring device, method or record required to be maintained under the Water Quality Act; or failing to monitor, sample or report as required by a permit issued pursuant to a state or federal law or regulation. See NMSA 1978, Section 74-6-10.2.

## 2. GENERAL FACILITY OPERATIONS

**A. LABELING:** The Owner/Operator shall clearly label all tanks, drums, and containers to identify the contents and provide other emergency notification information. The Owner/Operator may use a tank code numbering system, if that tank code numbering system is incorporated into its approved Contingency Plan.

**B. INSPECTIONS AND MAINTENANCE OF SECONDARY CONTAINMENT SYSTEMS:** The Owner/Operator shall inspect all secondary containment systems and sumps designed for spill collection/prevention and leak detection at least weekly to ensure proper operation and to prevent over topping or system failure. The Owner/Operator shall record the results of its inspection in a log book.

The Owner/Operator shall empty all spill collection and/or secondary containment devices of fluids within 72 hours of discovery. The Owner/Operator shall report any leak or failure of a secondary containment system to OCD as a release, in accordance with Permit Condition 2.E. The Owner/Operator shall repair any leak or failure of a secondary containment system as provided in its approved Contingency Plan or as required by OCD.

**C. RECORD KEEPING:** The Owner/Operator shall maintain at the Facility records of all inspections required by this Discharge Permit for a minimum of five years and shall make those records available for OCD inspection.

**D. TESTING:** The Owner/Operator shall provide OCD with notice one week prior to conducting any test required under this Discharge Permit, so that OCD may witness the test. The Owner/Operator shall maintain at the Facility records of all tests conducted pursuant to this Discharge Permit and the results of those tests, and make those records available for OCD inspection. The Owner/Operator shall give verbal notice of a test failure to OCD within 24 hours, and file a written report of the failure with the OCD within 15 days. The Owner/Operator shall complete repairs to correct the failure as provided in its approved Contingency Plan or as required by OCD.

**E. RELEASE REPORTING:** The Owner/Operator shall report unauthorized releases of water contaminants pursuant to 19.15.29 NMAC and any additional commitments made in the approved Contingency Plan. For purposes of this Discharge Permit, "releases" includes breaks,

leaks, spills and other failures of a primary or secondary containment system, and the movement of storm water from a "contact area" to a "non-contact area." At a minimum, the Owner/Operator shall file a written report of the release with both the OCD District Office and the OCD Santa Fe Office within 15 days for both "major releases" and "minor releases" as defined in 19.15.29.7 NMAC, and give verbal notice to both the OCD District Office and the OCD Santa Fe Office within 24 hours of discovering a "major release."

**F. CORRECTIVE ACTION FOR RELEASES:** The Owner/Operator shall take appropriate corrective action as specified in its approved Contingency Plan for all releases of contaminants whether or not the release qualifies as a "major" or "minor" release as defined in 19.15.29.7 NMAC.

The Owner/Operator shall address any contamination through the discharge permit process or pursuant to 20.6.2.4000 NMAC through 20.6.2.4116 NMAC (Prevention and Abatement of Water Pollution). OCD may require the Owner/Operator to modify its Discharge Permit to provide for investigation, remediation, abatement, and monitoring for any vadose zone or water pollution.

**G. ANNUAL REPORT:** The Owner/Operator shall submit an annual report to OCD by March 15 of each year. The annual report shall include the following:

1. For each waste stream, the amount of effluent and waste solids generated and stored in the prior calendar year;
2. The amount of and final disposition of each waste stream;
3. A copy of all inspections conducted of secondary containment systems; and
4. The nature and amount of any releases, with a description of the disposition of any contaminated soil or water.

### **3. MATERIAL STORAGE.**

**A. DRUM AND CONTAINER STORAGE:** The Owner/Operator shall store all drums and other containers, including empty drums and containers, on a curbed, impermeable pad. "Containers" include tote tanks, sacks, and buckets. The Owner/Operator shall store empty drums on their sides with the bungs in place and lined up on a horizontal plane. These requirements do not apply to drums and containers that contain only fresh water and are clearly so labeled.

**B. PROCESS, MAINTENANCE, MATERIAL, AND WASTE STORAGE AREAS:** The Owner/Operator shall pave and curb all process, maintenance, material and waste storage areas at its facility, or incorporate another appropriate spill collection device for the areas. (See 20.6.2.1203C(2) NMAC).

**C. ABOVE GROUND TANKS:** The Owner/Operator shall place above ground tanks on impermeable pads and surround the tanks with lined berms or other impermeable secondary containment system having a capacity at least equal to one and one-third times the capacity of the largest tank, or, if the tanks are interconnected, of all interconnected tanks. The

Owner/Operator is not required to provide secondary containment for any tanks that contain fresh water, and that are clearly so labeled.

The Owner/Operator shall retrofit existing above ground tanks that do not meet the requirements described above. The Owner/Operator shall submit a plan for the retrofitting to the OCD no later than the date for submitting an application for renewal of this Permit. The OCD will review and approve, approve with conditions, or deny the Owner/Operator's plan. The approved plan for retrofitting existing above ground tanks shall be incorporated into any permit renewal.

#### 4. WASTE MANAGEMENT.

**A. WASTE STREAMS:** This Discharge Permit authorizes the Owner/Operator to handle the waste streams identified in its approved Discharge Plan Application. **Owner/Operator must obtain OCD approval for disposal of any waste stream not identified in its approved Discharge Plan Application.**

**B. WASTE STORAGE:** The Owner/Operator shall store waste at its Facility only in clearly marked waste storage areas that have been identified in its approved Discharge Plan Application, except that waste generated during emergency response operations may be stored elsewhere for no more than 72 hours. OCD may approve additional waste storage areas on a case-by-case basis. The Owner/Operator shall not store oil field waste (see 19.15.2 NMAC) on site for more than 180 calendar days without obtaining approval from OCD.

**C. WASTE DISPOSAL:** This Discharge Permit does not authorize on site disposal of nondomestic wastes.

The Owner/Operator shall dispose of the waste streams identified in its approved Discharge Plan Application at OCD permitted or approved facilities in accordance with the applicable rules for disposal at those facilities. The Owner/Operator is approved for the simplified procedure set out in 19.15.35.8.B(4) NMAC for disposal of wastes specified in 19.15.35.8.C(2) and (3) NMAC at solid waste facilities without OCD's prior written authorization provided that the waste stream has been identified in the approved Discharge Plan Application and existing process knowledge of the waste stream does not change.

**D. CLASS V WELLS:** 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 UIC Class V injection wells, pursuant to 20.6.2.5002.B NMAC.

This Discharge Permit does not authorize the use of a Class V injection well for the disposal of industrial waste at the Facility. The Owner/Operator shall close any Class V industrial waste injection wells at the Facility that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes (*e.g.*, septic systems, leach fields, dry wells, *etc.*) pursuant to 20.6.2.5005 NMAC within 90 calendar days of the issuance of this Discharge Permit. Other Class V wells, including wells used only for the injection of domestic wastes, must be permitted by the New Mexico Environment Department.

**5. BELOW-GRADE TANKS, PITS, PONDS, AND SUMPS.**

**A. EXISTING BELOW-GRADE TANKS, PITS AND PONDS:** Below-grade tanks, pits, and ponds must have secondary containment systems with leak detection. The Owner/Operator shall retrofit existing below-grade tanks, pits and ponds that do not have secondary containment and leak detection systems to meet these requirements. The Owner/Operator shall submit a plan for the retrofitting to OCD no later than the date for submitting an application for renewal of this Discharge Permit. OCD shall review and approve, approve with conditions, or deny the Owner/Operator's retrofit plan. The approved plan for retrofitting existing below-grade tanks, pits and ponds shall be incorporated into any permit renewal.

The Owner/Operator must test existing below-grade tanks, pits and ponds without secondary containment and leak detection annually or as specified herein. 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.

**B. EXISTING SUMPS:** A sump is any impermeable vessel or collection device incorporated within a secondary containment system, with a capacity less than 500 gallons, which remains predominantly empty, serves as a drain or receptacle for *de minimis* releases on an intermittent basis and is not used to store, treat, dispose of or evaporate products or wastes. The Owner/Operator shall empty all sumps of all materials at least once a week.

**C. NEW BELOW-GRADE TANKS, PITS, PONDS AND SUMPS:** The Owner/Operator shall obtain OCD's approval before installing a new below-grade tank, pit, pond or sump. The Owner/Operator should submit a proposed design plan to OCD to install a new below-grade tank, pit, pond or sump at least 90 calendar days before it intends to install the new unit. Design plans for below-grade tanks, pits, and ponds shall incorporate secondary containment and leak detection. Proposed design plans for pits and ponds shall include hydrologic and geologic reports, siting information, monitoring and closure plans and information on foundation and liners. OCD will review and approve, approve with conditions, or deny the Owner/Operator's proposed design for a new below-grade tank, pit, pond or sump.

**D. FENCING:** The Owner/Operator shall fence all below-grade tanks, pits and ponds pursuant to 19.15.17.11.D NMAC.

**E. SCREENING AND NETTING:** The Owner/Operator shall screen or net all open top tanks that are eight feet in diameter or larger and all pits (including lined pits), or otherwise render the tanks and pits non-hazardous to wildlife, including migratory birds, pursuant to 19.15.17.11.E NMAC.

**6. UNDERGROUND PROCESS AND WASTEWATER PIPELINES.**

**A. TESTING:** 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. The Owner/Operator shall test all pressure-rated pipe to 150% of 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 propose other test methods for OCD's review and approval.

**B. SCHEMATIC DIAGRAMS OR PLANS:** The Owner/Operator shall maintain at its Facility all underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location.

**C. NEW UNDERGROUND PIPING:** The Owner/Operator must notify OCD prior to installing any new underground piping. The Owner/Operator should submit a design plan to the OCD for new underground piping at least 90 calendar days before it intends to begin construction. The OCD shall determine whether any modifications to this Discharge Permit are necessary and appropriate based on the new underground piping.

**7. STORM WATER:** The Owner/Operator shall implement and maintain storm water run-on and run-off plans and controls to separate chemical process areas and flow lines (contact areas) from storm water areas (non-contact areas), and shall comply with any additional commitments made in its approved Contingency Plan. The movement of storm water from a contact area to a non-contact area is a release, and the Owner/Operator shall report that release and take corrective action.

**8. ADDITIONAL SITE SPECIFIC CONDITIONS:** N/A

**9. CERTIFICATION: (OWNER/OPERATOR)** by the officer whose signature appears below, acknowledges receipt of this Discharge Permit, and has reviewed its terms and conditions.

\_\_\_\_\_  
Company Name - print name above

\_\_\_\_\_  
Company Representative - print name

\_\_\_\_\_  
Company Representative - Signature

Title \_\_\_\_\_

Date: \_\_\_\_\_

## NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

**(GW-400) Mr. Aaron Dailey, Environmental Specialist, Williams Four Corners, 188 CR 4900, Bloomfield NM, has submitted a new application for approval of a discharge plan for their Ojito compressor station, located in the SW/4 SW/4 of Section 6, NW/4 NW/4 of Section 7, Township 26 North, Range 3 West, NMPM, Rio Arriba County. The facility provides metering and compression to various producers for the gathering of natural gas. The facility operates at total horsepower of 2400 HP. Approximately 600-8000 bbl/yr of produced water, 500-8000 bbl/year of condensate and 500 – 2000 gal/year/engine of used oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 25 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.**

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerales y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28<sup>th</sup> day of October 2009.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director

RECEIVED  
2009 OCT 13 PM 12 46

*Cirrus Consulting, LLC*

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October 9, 2009

Mr. Leonard Lowe  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Subject: Discharge Plan Application  
Williams Four Corners, LLC Ojito Compressor Station

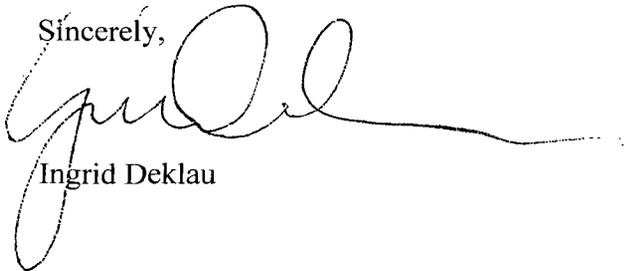
Dear Mr. Lowe:

On behalf of Williams Four Corners, LLC, Cirrus Consulting, LLC submitted the Discharge Plan application for the Ojito Compressor Station to you via email on October 9, 2009. A copy of the email was also forwarded to Brandon Powell, OCD District 3.

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

If any additional information is needed, please contact me at the number below or Aaron Dailey of Williams Four Corners, LLC at (505) 632-4708.

Sincerely,



Ingrid Deklau

---

*Cirrus Consulting, LLC*  
1828 Harrison Ave.  
Salt Lake City, Utah 84108

Tel: (801) 583-3107

ideklau@cirrusllc.com

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. \_\_\_\_\_ dated 10/9/09

or cash received on \_\_\_\_\_ in the amount of \$ 100<sup>00</sup>

from Cirrus Consulting

for GW-400

Submitted by: LAWRENCE RAMIREZ Date: 10/19/09

Submitted to ASD by: Juan Ramiro Date: 10/19/09

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 the OCD Guidelines for assistance in completing the application)

NEW

New     Renewal     Modification

1. Type: Compressor Station (Ojito Compressor Station)

2. Operator: Williams Four Corners, LLC

Address: 188 CR 4900, Bloomfield, NM 87413

Contact Person: Aaron Dailey

Phone: 505-632-4708

3. Location: SW/4 SW/4 Section 6 & NW/4 NW/4 Section 7 Township 26 North Range 3 West

Submit large scale topographic map showing exact location.

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

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

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

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

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

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

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

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

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

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

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

Name: Aaron Dailey; Signature: A. Dailey

Title: Environmental Specialist

E-mail Address: aaron.dailey@williams.com

Date: 10/9/09



# **Ojito Compressor Station**

## **NMOCD Discharge Plan**

**Williams Four Corners, LLC**

**188 CR 4900**

**Bloomfield, NM 87413**

October 2009

**Item 1**

*Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant (CO<sub>2</sub> removal) and compressor station include the total combined site rated horsepower.*

The Ojito Compressor Station is owned and operated by Williams Four Corners, LLC (Williams). The station was constructed in 1969 to provide various producers with natural gas gathering, compression, treatment and delivery services through the Williams system. The site is permitted for three reciprocating compressor engines (site rated at 800 hp each) and four dehydrators. In addition, there are various storage tanks, support structures and ancillary equipment.

**Item 2**

*Name of operator or legally responsible party and local representative.*

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

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

**Item 3**

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

Rio Arriba County, New Mexico  
Township 26 North, Range 3 West, SW/4 SW/4 Section 6 & NW/4 NW/4 Section 7  
The topographic map is attached as Figure 1.

**Item 4**

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

Bureau of Indian Affairs  
Jicarilla Apache Indian Agency  
PO box 167  
Dulce, New Mexico 87528  
575-759-3242

**Item 5**

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

This facility is classified as a field compressor station and it is partially manned; this facility serves as a district field office. A copy of the facility plot plan indicating location of equipment and tanks on the facility is attached as Figure 2.

**Item 6**

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

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

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

**Item 7**

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

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, 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 (NMOCD Form C-138) for each non-exempt waste stream. Non-exempt wastes will be analyzed at a minimum for BTEX, TPH, RCRA D-List metals, ignitability, corrosivity, and reactivity to initially determine if such waste are hazardous as defined in 40 CFR Part 261. All wastes at the facility will be periodically surveyed for naturally occurring radioactive material (NORM) to determine if the concentrations of Radium 226 exceed 30 picocuries per gram or if radiation exposure exceeds 50 microrentgens per hour. If affirmed, such materials will be handled and disposed in accordance with NMOCD NORM Regulations.

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

**Item 8**

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

All effluent from this site is handled in accordance with NMOCD and NMED regulations. Liquid and solid waste collection and disposal procedures are included in Table 1.

**Item 9**

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

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

**Item 10**

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

Williams' personnel will operate and maintain the facility. The facility is typically manned four days a week during the normal working hours. The facility is also 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 the Williams' spill notification service. The service immediately notifies the Environmental Department and all appropriate agencies as required.

**Item 11**

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

Spill containment berms around above ground storage tanks are designed to contain 133% of the tank capacity.

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 C-141.

**Item 12**

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

The Ojito Compressor Station is located in Cedar Canyon. The site elevation is approximately 6950 feet above mean sea level. The natural ground surface topography slopes downward toward the east. The maximum relief over the site is approximately 20 feet. Site drainage is to the east. Intermittent flow from the site will follow natural drainage east and then south via a wash approximately ½ mile to the Tapacito Creek drainage. Tapacito Creek drains to the west into Largo Canyon, approximately 17 miles to the west of the site. The nearest down gradient perennial

source of surface water is the San Juan River , at the northern-most reach of the Largo Canyon, and is located approximately 33 miles down gradient from the site, at an elevation of approximately 5530 feet.

The 100-year 24-hour precipitation event at a regional weather station is approximately 2.8 inches. This small amount of rainfall for the area should pose minimal flood hazard. When practical, surface water runoff from the area surrounding the site will be diverted around the facility into the natural drainage path.

A well search was performed using the references listed below for this application. Two water wells were found within a one-mile radius of Ojito Compressor Station. Available information regarding well use, legal description, depth of well, and depth to water for these wells is shown in the table below.

The estimated depth to groundwater is greater than 25 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2000 parts per million.

Township; Range; Section	Quarter <sup>a</sup>	Apx. Distance from Site (mi)	Well #	Use	Well Depth (ft)	Water Bearing Stratification (ft)	Description <sup>b</sup>	Depth to Water (ft) <sup>c</sup>
26N; 3W; 7	3,1,1,1	<0.25	unk	unk	unk	unk	6895 ft above msl Water bearing unit: Tsj (?); Qal (?) Spec conductance: 2000 umhos (6/21/78)	unk
26N; 3W; 7	3,1,4	>0.75	BIA Counting Pens	unk	370	unk	6890 ft above msl Water bearing unit: Tsjr Spec conductance: 1680 umhos (5/8/58)	74

unk = unknown; <sup>a</sup> 1=NW; 2=NE; 3=SW; 4=SE; <sup>b</sup> Qal=Quaternary alluvium; Tsj = Tertiary San Jose Formation; Tsjr = Tertiary San Jose Formation, Regina Member

### References

<sup>1</sup>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.

<sup>2</sup>Online Well Reports and Downloads, New Mexico Office of the State Engineer, search performed 12/5/2008.

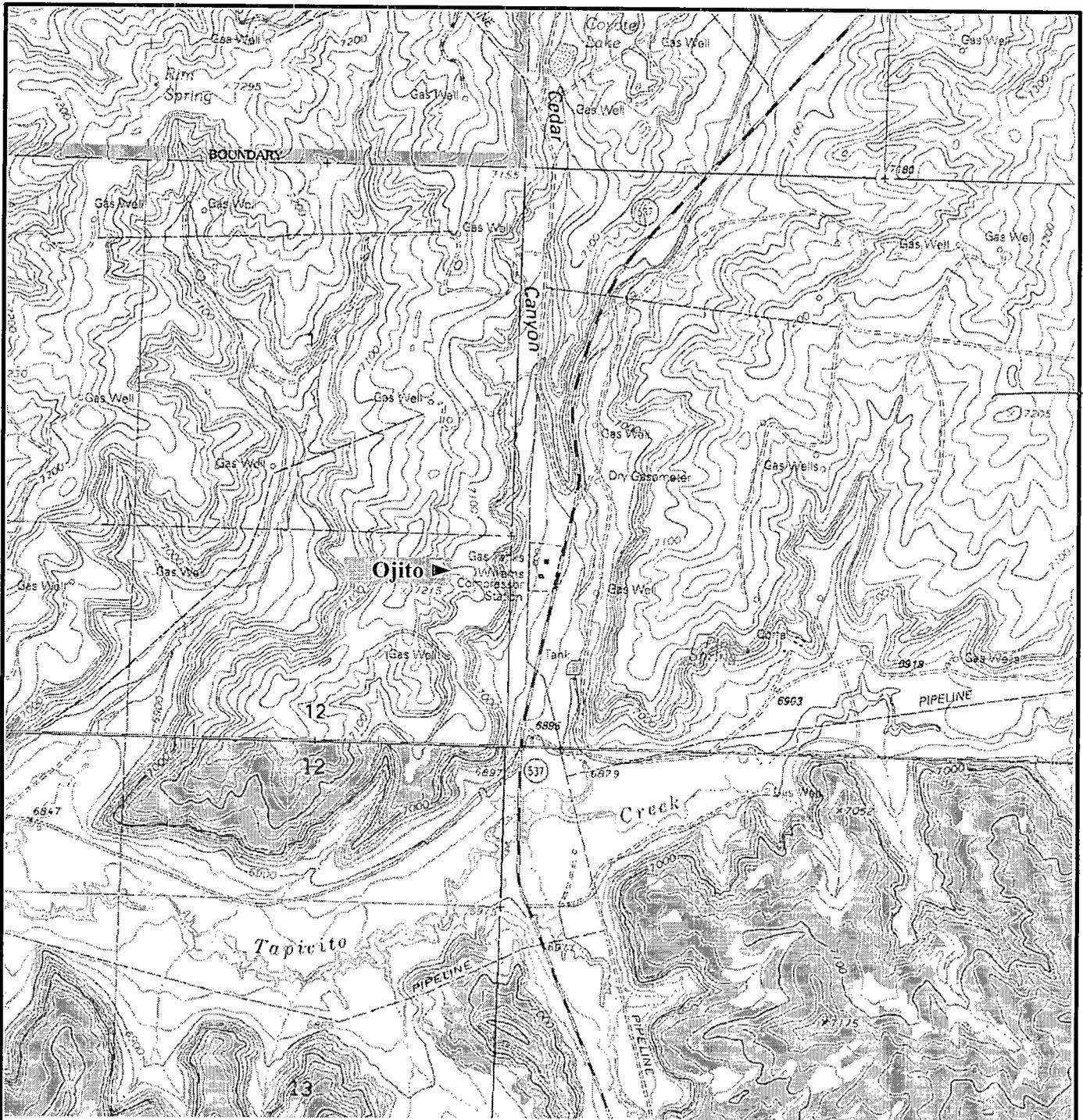
**Item 13**

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

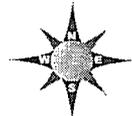
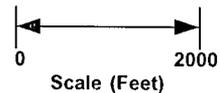
All reasonable and necessary measures will be taken to prevent the exceedence of WQCC Section 3103 water quality standards should Williams choose to permanently close the facility. Williams will submit a detailed closure plan to the NMOCD prior to closure.

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 and reseeded using a mix and methods specified by the USFS (land owner).

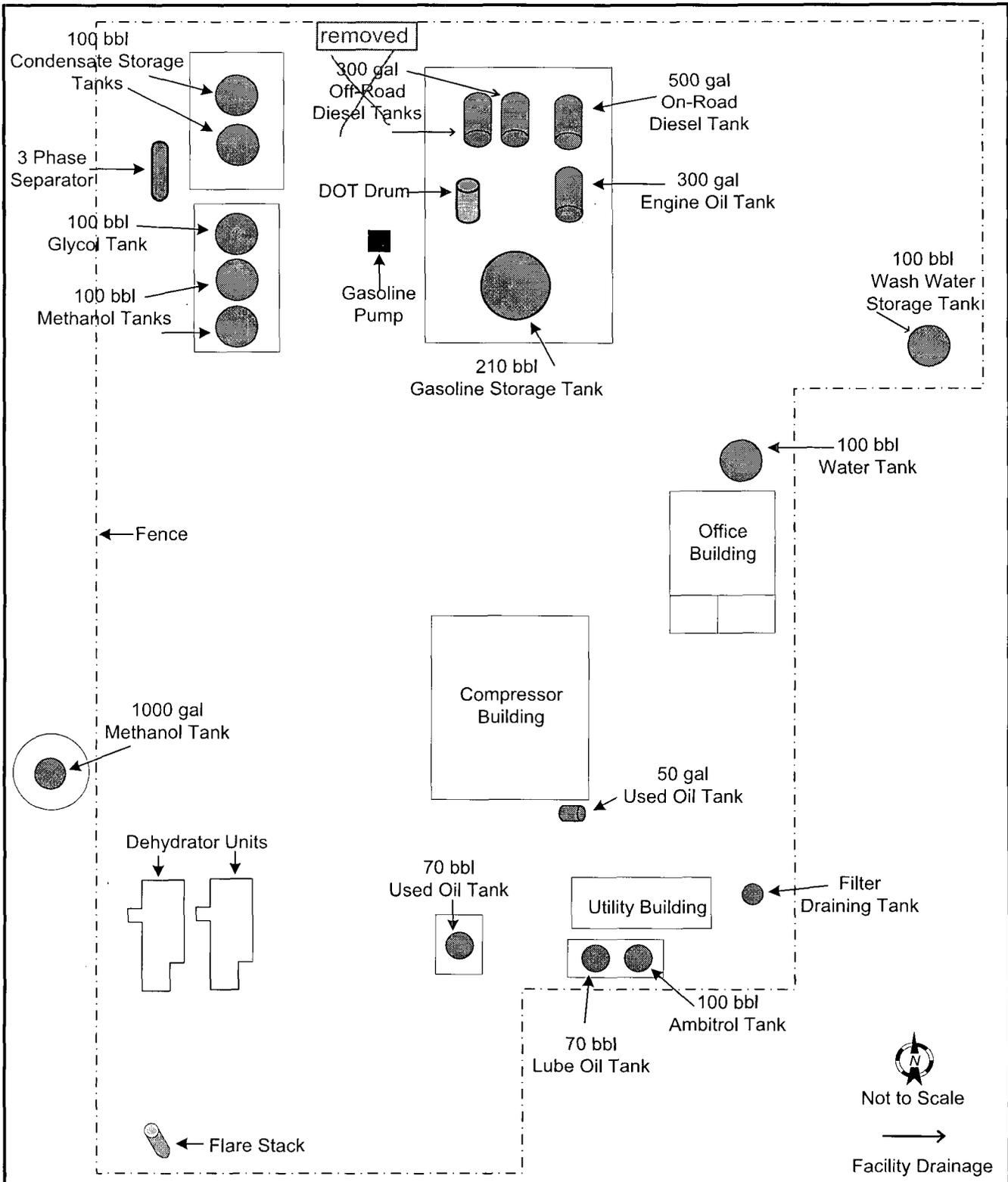
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.



Source: USGS Pine Lake and Schmitz Ranch, NM Quadrangles



**Figure 1 Site Vicinity / Topographic Map**  
**Ojito Compressor Station**  
 Sections 6 & 7, Township 26N Range 3W  
 Rio Arriba County, New Mexico



**Facility Site Plan**  
**Ojito Compressor Station**

Rio Arriba County, New Mexico

Not to Scale  
 Facility Drainage

**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 Tank	Above Ground Storage Tank	2940 gal	Concrete Containment	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Compressor Used Oil Tank	Above Ground Storage Tank	50 gal	Concrete Containment	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Natural Gas Condensate	Above Ground Storage Tank	2 @ 100 bbl	Earthen 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.
Filter Draining Tank	Above Ground Storage Tank	440 gal	N/A	Non-exempt	Liquids will be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.
Used Oil Filters and Oil Soaked Pads and Socks	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Used oil filters and oil soaked pads and socks will be recycled as required by OCD regulations.
Used Process Filters	Drum or other container	Varies	Transported 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	Spill Pallets	Non-exempt	Barrels are returned to supplier and ultimately recycled/disposed consistent with applicable regulations.
Facility Water & Wash Water	Above Ground Storage Tank	2 @ 100 bbl	N/A	Non-Exempt	Off-spec material recycled or disposed consistent with applicable regulations.
On-road Diesel Tank	Above Ground Storage Tank	500 gal	Earthen Berm	Non-exempt	Off-spec material recycled or disposed consistent with applicable regulations.
Engine Oil Tank	Above Ground Storage Tank	300 gal	Earthen Berm	Non-exempt	Off-spec material recycled or disposed consistent with applicable regulations.
Gasoline	Above Ground Storage Tank	8820 gal	Earthen Berm	Non-exempt	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	2940 gal	Concrete walls, earthen floor	Non-exempt	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol	Above Ground Storage Tank	4200 gal	Concrete Walls with Earthen Floor	Non-exempt	Off-spec material returned to supplier for recycling or disposal consistent with applicable regulations.

**Table 1 (continued)  
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
Methanol	Above Ground Storage Tank	2 @ 4200 gal	Earthen Berm	N/A	Off-spec material returned to supplier for recycling or disposal consistent with applicable regulations.
Methanol	Above Ground Storage Tank	1000 gal	Metal Ring Containment	N/A	Off-spec material returned to supplier for recycling or disposal consistent with applicable regulations.

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Natural Gas Condensate/ Produced Water	Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank	600-8000 bbl/year	May contain trace lube oil and/or glycol
Natural Gas Condensate	Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank	500-8000 bbl/year	No Additives
Waste Water/ Wash Down Water	Compressor and Dehy Skids; Process Areas; Condensate Tank	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil and/or TEG
Used Glycol/Antifreeze/ Methanol	Site and Field Dehydration/ Coolant	0-4000 bbl/yr	No additives
Used Solvent	Parts Cleaner; Pipeline Additive	0-500 gal/year	No additives
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	50-500/year/engine	No Additives
Used Process Filters	Charcoal, Activated Carbon, Molecular Sieve	50-500 cubic yd/yr	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Amibitol	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
Used/off-spec materials (eg. glycol, antifreeze, corrosion inhibitor)	Dehydration and compression	0-200 gal/yr/material	No Additives

**APPENDIX A**

**Williams Four Corners, LLC**

**Release Reporting and Pollution Prevention Procedures**

	<b>System Integrity Plan</b>	Environmental Protection	Procedure No. 6.04-ADM-002	
		Revision No: 13	Effective Date: 01/01/09	Page: 1 of 10
Procedure: <b>RELEASE REPORTING</b>				

## 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 very short timeframes required 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 all Releases and events required to be reported by this Procedure are reported immediately. Do not delay reporting by attempting to exactly determine the amount released. Report immediately with an estimate and correct later.

### NOTE

Third parties operating Company facilities (e.g., Exterran) are responsible for reporting in accordance with this Procedure or other reporting Procedure if approved by the Company in advance.

## 2.0 PROCEDURE

### 2.1 Offshore Release Reporting

#### 2.1.1 Operations will:

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

2.1.1.1.1 Any Release of Oils as defined by the US Coast Guard to water or sludge beneath the surface of the water whether from Company facilities or others.

2.1.1.1.2 Any release of other (unpermitted) hazardous or toxic substances including but not limited to methanol, ethylene glycol, sodium hydroxide (caustic), sulfuric acid, fuel additives.

2.1.1.1.3 Any Gas Release >50 MSCF;

- 2.1.1.1.4 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;
  - 2.1.1.1.5 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or Hazardous Liquids lost **and/or**, costs of clean up or recovery of the operator **and/or** others  $\geq$ \$50,000.
  - 2.1.1.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.1.1.1.3 through 2.1.1.1.5.
- 2.1.1.2 Submit any revised/updated information related to the Release(s) to the Environmental Specialist upon discovery.
  - 2.1.1.3 Retain copies of the written notifications at the Facility or in a central location.
- 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 the Qualified Individual (QI) and submit written reports to the appropriate Qualified Individual (QI), Environmental Specialist and Offshore Compliance Specialist.
- 2.1.3 The Environmental Specialist will:
    - 2.1.3.1 Complete the Online Release Report within 3 working days.
    - 2.1.3.2 Complete any required follow-up written reports and/or documentation for non-transportation events within regulatory timeframes in accordance with the Release Reporting Requirements (Telephonic and Written).
    - 2.1.3.3 Retain copies of the written notifications in the Regulatory Communications folder.
- 2.1.4 The Offshore Regulatory Compliance Specialist will:
    - 2.1.4.1 Complete any required follow-up written reports 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.

- 2.1.4.2 Complete any additional documentation that may be required for transportation related events within regulatory timeframes and in accordance with the Release Reporting Requirements (Telephonic and Written) for the specific State in which the event occurred.
- 2.1.4.3 Complete any required follow-up written reports as required by MMS regulations or applicable permits. Such follow up written reports must be submitted no later than 15 days after the Release has been stopped. Complete any additional documentation that may be required within regulatory timeframes and in accordance with the Offshore Spill Notification Matrix.
- 2.1.4.4 Retain copies of the written notifications in the Regulatory Communications folder.
- 2.1.4.5 Submit on a supplemental report any additional information relative to an event that is discovered after the initial final 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 a Gas line (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 Operations will:

- 2.2.1.1 Immediately report the following type(s) of onshore Release(s) or event(s) to the Company's third-party release reporting contractor, ES&H at 1-800-688-6747:
  - 2.2.1.1.1 Any Liquid Release (e.g., gasoline, diesel, MDEA, TEG, NGL, Brine etc.) that enters or has the potential to enter, any waterway (e.g., ditch, arroyo, intermittent stream, or any other body of water.);
  - 2.2.1.1.2 Any individual Liquid Release to the surface >1 gallon;
  - 2.2.1.1.3 Any cumulative Liquid Release to the surface >5 gallons within a 24-hour period (drips, pinhole leaks, etc.).

**NOTE**

Report immediately if you determine or suspect that the 5 gallon/24 hour threshold will be met or exceeded

**NOTE**

Releases that are completely contained within structures must be reported to the Company's third party release reporting contractor if any of the above criteria are met. When the third party release reporting contractor is informed that the Release was completely contained inside of a structure, the Release will not be reported to any state or federal agency.

- 2.2.1.1.4 Any Gas Release >50 MSCF;
- 2.2.1.1.5 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;
- 2.2.1.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or Hazardous Liquids lost **and/or**, costs of clean up or recovery of the operator **and/or** others  $\geq$ \$50,000;
- 2.2.1.1.7 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 2.2.1.1.1 through 2.2.1.1.6.
- 2.2.1.2 Submit any revised/updated information related to the Release(s) to the Environmental Specialist upon discovery.
- 2.2.1.3 Retain copies of the written notifications at the Facility or in a central location.

**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, who will notify the appropriate regulatory agency(s).

**2.2.2 ES&H will:**

2.2.2.1 Immediately make the required telephonic notifications in accordance with the Release Reporting Requirements (Telephonic and Written).

2.2.2.2 Complete the information required in the Online Release Report concurrent with their receipt of information in 2.2.2.1 above.

**2.2.3 The Environmental Specialist (or DOT Compliance Specialist, as appropriate) will:**

2.2.3.1 Follow-up with Operations to verify that adequate response and reporting measures have been taken for each Release.

2.2.3.2 Make the required written notifications in accordance with the Release Reporting Requirements (Telephonic and Written) and track closure of each Release report with appropriate regulatory agencies.

2.2.3.3 Retain copies of the written notifications in the Regulatory Communications folder.

2.2.3.4 Immediately make necessary changes to the Online Release Report as revised/updated information is provided.

**2.3 Planned / Scheduled Blowdowns****2.3.1 Operations will:**

2.3.1.1 Notify the Environmental Specialist as far as possible in advance of planned/scheduled blowdowns that are not an exception per 2.4.2 of this Procedure.

2.3.1.2 Provide the Environmental Specialist with the estimated quantity and material composition based on a current extended chromatographic analysis or process knowledge of the product to be released.

**2.3.2 The Environmental Specialist will:**

2.3.2.1 Review information provided from Operations;

2.3.2.2 Notify appropriate agencies;

2.3.2.3 Obtain required permits or permissions, or notify the Company's third party release reporting contractor;

- 2.3.2.4 Provide Operations with any special conditions and/or limitations to be observed before, during, and/or after the planned/scheduled blowdown event; and
- 2.3.2.5 Perform any required post event reporting or follow-up to agencies.
- 2.3.2.6 Retain copies of the written notifications in the Regulatory Communications folder.

## 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 and is not released from containment. Upon discovery, Operations should notify the Environmental Specialist and determine proper disposal practices for these cases.
- 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 Operations will submit the following information to the Environmental Specialist within 45 days of any Release that affected soil or water:
  - 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 (e.g., landfarm, landfill, disposal, etc.);
  - 2.5.1.3 Costs incurred because of Release. (Includes value of lost product, costs associated with repair, response, clean up, disposal, etc.)
- 2.5.2 The Environmental Specialist will update the Online Release Report with the 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 – N/A****3.3 Forms and Attachments**

3.3.1 Online Release Report

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Release Reporting Requirements (Telephonic & Written)

3.3.4 Form 7100.2 - Incident Report - Gas Transmission and Gathering Systems

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

3.3.6 SIP Feedback/Change Request

**4.0 DEFINITIONS**

**4.1 DOT Jurisdictional Pipeline or Pipeline Facility** – Pipeline or pipeline facility subject to 49 CFR Parts 192 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** – 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 their 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
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."
10/18/07	1.1	Rewrite NOTE to read: Due to the very short timeframes required 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 all Releases and events required to be reported by this Procedure are reported immediately. Do not delay reporting by attempting to exactly determine the amount released. Report immediately with an estimate and correct later
	2.1.1	Add "the Qualified Individual (QI), Team Lead," to the list of people to be informed of offshore releases.
	2.1.1.2	Add paragraph
	2.1.4	Delete "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."
	2.1.6	Delete "...beyond the initial telephonic notifications given by either 3E Company or OOPS for DOT reportable events"
	Global	Revised to reflect the change of release reporting contractor.

<b>RELEASE REPORTING</b>	6.04-ADM-002
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	2.1.1.2 – 2.1.1.3	New
	2.1.4.2	New

	<b>System Integrity Plan</b>	Element: Environmental Protection	Initiative No: SIP-ADM-6.04	
		Revision No: 12	Effective Date: 01/01/09	Page: 1 of 4
Initiative: <b>POLLUTION PREVENTION AND SPILL RESPONSE</b>				

## 1.0 OBJECTIVE

- 1.1 To prevent and/or mitigate the effects of unplanned releases.

## 2.0 DESCRIPTION

- 2.1 Company operated assets can be the source of releases into the environment, some of which may be harmful to employees, neighboring communities and the environment in which we all live. The Company has established the following standards to prevent, minimize, and mitigate these environmental impacts and maintain regulatory compliance.

## 3.0 STANDARDS

### 3.1 Manager of Environmental Stewardship shall:

- 3.1.1 Maintain 6.04-ADM-001 - Pollution Prevention and Control and 6.04-ADM-002 - Release Reporting for Company operated assets. These Procedures will be reviewed and updated Annually.

### 3.2 Environmental Specialist shall:

- 3.2.1 Validate the accuracy and completeness of the emergency contact information in the Release Reporting Requirements (Telephonic and Written) for the applicable agencies in their assigned states Annually.
- 3.2.2 Develop and maintain Pollution Prevention and Spill Response Plans, ensuring they are placed in Livelink, which may include but are not limited to Facility Response Plans (FRPs), Spill Prevention Control and Countermeasure Plans (SPCCs), Stormwater Pollution Prevention Plans (SWPPPs), New Mexico Oil Conservation Division (NMOCD) Discharge Plans or Oil Spill Response Plans (OSRPs) as required by applicable regulations per the 6.04-ADM-001 - Pollution Prevention and Control Procedure. A partial listing of regulatory requirements and applicability standards is provided in 6.04-ADM-003 - Plans Required for Facilities-Pipelines.
- 3.2.3 Review, recertify (where applicable) and distribute Pollution Prevention and Spill Response Plans on or before the scheduled due date.
- 3.2.4 Modify and distribute Pollution Prevention and Spill Response Plans to address new or different operating conditions or deficiencies within 60 days of identification.

- 3.2.5 For onshore releases, review initial release reports within 3 working days after entry into the online release report database by the Company's third party release reporting contractor.
- 3.2.6 For offshore releases, complete the Online Release Report upon notification from the Company's third party release reporting contractor.
- 3.2.7 For all releases, review the final release reports to ensure accuracy.
- 3.2.8 Complete any required follow-up written reports and/or documentation for non-transportation events within regulatory timeframes in accordance with the Release Reporting Requirements (Telephonic and Written).

### 3.3 Manager of Operations shall:

- 3.3.1 Complete the Pollution Prevention and Spill Response Plan tasks generated by the Environmental Management Information System (EMIS).
- 3.3.2 Forward any changes affecting the Pollution Prevention or Spill Response Plans to the area Environmental Specialist within 5 working days of such change(s).
- 3.3.3 Establish and maintain adequate resources to execute the Pollution Prevention and Spill Response Plans.
- 3.3.4 Correct deficiencies documented on the 0019 – External Visual Tank Inspection.
- 3.3.5 Review the initial release reports within 3 working days after entry into the Online Release Report.
- 3.3.6 Review the final release reports to ensure accuracy.

### 3.4 Employees shall:

- 3.4.1 Complete tasks generated by the Environmental Management Information System (EMIS).
- 3.4.2 Utilize the applicable Pollution Prevention and Spill Response Plan for responding to releases.
- 3.4.3 Report all releases in accordance with the 6.04-ADM-002 - Release Reporting Procedure.
- 3.4.4 Review the initial release reports within 3 working days after entry into the Online Release Report.
- 3.4.5 Review the final release reports to ensure accuracy.

**3.5 Project Manager shall:**

3.5.1 Prior to the initiation of construction of new facilities or modification of existing facilities, and prior to initial operation, review Pollution Prevention and Spill Response Plan requirements with the area Environmental Specialist.

**4.0 MEASURES****4.1 SIP Measures**

4.1.1 Number of unplanned reportable releases

**4.2 Element Measures – N/A****5.0 LINKS**

5.1 [6.04-ADM-001 - Pollution Prevention and Control](#)

5.2 [6.04-ADM-002 - Release Reporting](#)

5.3 [6.04-ADM-003 – Plans Required for Facilities-Pipelines](#)

5.4 [Online Release Report](#)

5.5 [Release Reporting Requirements \(Telephonic & Written\)](#)

5.6 [Facility Response Plans](#)

5.7 [Oil Spill Response Plan](#)

5.8 [Spill Prevention Control & Countermeasure Plans](#)

5.9 [SIP Feedback/Change Request](#)

➤➤➤End<<<<

### System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
8-22-06	2.1	Added "minimize"
	3.2.2	Deleted "3.2.2 When new or additional tasks are required, add the necessary tasks to EMIS within 30 days of identification."
	3.2.3 – 3.2.5	New
	3.3.3	New and renumbered
	3.4.3	New
	4.2	Deleted "Number of overdue pollution prevention and spill response plan reviews"
11/15/06	3.1.1	Deleted "Establish and"
	3.2.1	Added "in Livelink"
04/23/07	3.2.4	Changed Release Report Database Compliance Specialist in Tulsa to "Team Lead – Environmental". The other position does not exist.
10/14/07	2.2.1	Delete "To determine plans applicable to your facility/pipeline" Add "A partial listing of regulatory requirements and applicability standards is provided in <u>6.04-ADM-003 – Plans Required for Facilities-Pipelines.</u> "
	3.2.1	Add "A partial listing of regulatory requirements and applicability standards is provided in <u>6.04-ADM-003 – Plans Required for Facilities-Pipelines.</u> "
	3.3.2	Add "At a minimum, the Annual review should evaluate personnel, phone numbers and product changes in tanks or addition/removal of tanks. Forward any changes to the area Environmental Specialist. Establish and maintain adequate resources to execute the Pollution Prevention and Spill Response Plans."
	3.3.4, 3.3.5	Delete entire paragraph
	Global	Fix and update links
10/15/07	2.2	Remove entire section.
	3.2.1	Replace "Maintain Pollution Prevention and Spill Response Plans..." With "Develop and maintain Pollution Prevention and Spill Response Plans..."
12-04-08	Global	Rewritten to improve quality, provide clarity and define/assign responsibilities and to reflect process to follow with new release reporting contractor.

See attached DRAFT Public Notice, to include the following:

- Newspaper notice published in Farmington Daily Times in English and Spanish
- Postings
- Posting at facility fence (2 feet x 3 feet in size) in English and Spanish
  - Posting at offsite location (considering Counselor Trading Post or Dulce Post Office) in English and Spanish

Landowner Letters

- Landowners within 1/3 mile – need to confirm nothing beyond Jicarilla ownership
- Landowner notice to Jicarilla

For newspaper and  
posting

## PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted an application in October 2009 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for their Ojito Compressor Station located in the SW/4 SW/4 Section 6, NW/4 NW/4 of Section 7, Township 26 North, Range 3 West in Rio Arriba County, New Mexico. The facility, located approximately 25 miles northeast of Counselor, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100 – 5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be greater than 25 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

For newspaper and  
posting

### ATENCIÓN PÚBLICA

Williams Four Corners, LLC, County Road 4900, Bloomfield, NM 87413, han presentado una aplicación en octubre de 2009 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para su Ojito Compressor Station localizada en el SW/4 SW/4 de la Sección 6, NW/4 NW/4 de la Sección 7, Municipio 26 Norte, Recorren 3 Oeste en Rio Arriba County, New Mexico. La instalación, noreste de aproximadamente 25 millas localizado de Counselor, proporciona servicios de acondicionamiento y compresión de gas naturales.

El plan de descarga se dirige como las caídas, los agujeros, y otras descargas casuales a la superficie serán manejados. Los materiales típicos generados o usados en la instalación incluyen el echar agua condensado/producir de gas natural, el petróleo de lubricación nuevo y usado, echar agua de desecho aceitoso del equipo se lavan abajo, y glicol. La cantidad de wastewater generado es 100 – 5000 galones por año por motor. La instalación no descarga para revestir o subrevestir los echares agua. Toda la basura generada será temporalmente almacenada en tanques o contenedores equipados con la contención secundaria. La basura transportó offsite será dispuesto o reciclado en una instalación permitida por la agencia estatal, federal, o tribal recibir tal basura. Se espera que la profundidad de agua subterránea estimada en el sitio esté en la variedad de 25 pies. El total se disolvió se espera que la concentración de sólidos del agua subterránea de área esté en la variedad de 200-2,000 partes por millón.

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

Landowner



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

September 1, 2009

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Bureau of Indian Affairs  
Jicarilla Apache Indian Agency  
PO box 167  
Dulce, New Mexico 87528

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC submitted a Discharge Plan application to the Oil Conservation Division for the Ojito Compressor Station in October 2009. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations.

The facility, located in the SW/4 SW/4 Section 6, and NW/4 NW/4 Section 7 Township 26 North, Range 3 West, Rio Arriba County, New Mexico, approximately 25 miles northeast of Counselor, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100–5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be greater than 25 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:

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

Respectfully submitted,

Aaron Dailey  
Environmental Specialist