

GW - 60

**INSPECTIONS &
DATA**



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

P 288 258 674

November 7, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-674

Ms. Leigh E. Gooding
Williams Field Services
P.O. Box 58900, M.S. 2G1
Salt Lake City, Utah 84158-0900

**RE: Inspection Reports for GW-60,
GW-248, GW-249, GW-250,
GW-256, and GW-257
San Juan County, New Mexico**

Dear Ms. Gooding:

The discharge plan inspection reports for the above captioned Williams Field Services Facilities are enclosed. Williams shall respond to each of the issues for each facility within 30 days of receipt of this letter and the enclosed inspection reports. Please send a copy of your response to OCD Santa Fe and the OCD Aztec District Office.

Williams Field Services continued commitment to the environmental quality of the State of New Mexico is appreciated. The OCD appreciates the professional conduct of WFS operations personnel who accompanied us during the inspections.

If you have any questions in the meantime feel free to give me a call at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist,
Environmental Bureau-OCD

xc: Mr. Denny Foust - OCD Aztec District Office.

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

| | | |
|---|-----------------------|--|
| Send to | Ms. Gooding - INS RPT | |
| Street & Number | GW-60, 248, 249, 250, | |
| Post Office, State, & ZIP Code | 256, 257 - Fall 1996 | |
| Postage | \$ | |
| Certified Fee | | |
| Special Delivery Fee | | |
| Restricted Delivery Fee | | |
| Return Receipt Showing to Whom & Date Delivered | | |
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| TOTAL Postage & Fees | \$ | |
| Postmark or Date | | |

PS Form 3800, April 1995

DISCHARGE PLAN INSPECTION

FACILITY NAME: Milagro "GW-60" LOCATION: SW/4 SE/4
Section 12, Township 29 North, Range 11 West, NMPM
San Juan County, New Mexico

DATE: 10/21/96 OWNER: Williams Field Services.

OCD INSPECTORS: Denny Faust and Pat Sanchez
"Inspect Train No. 5 modification and Lab Area."

1. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

No Compliance issues.

2. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

No Compliance issues.

3. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.

No Compliance issues.

4. **Above Ground Saddle Tanks:** Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

No Compliance issues.

5. **Tank Labeling:** All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

No Compliance issues.

6. **Below Grade Tanks/Sumps:** All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

No compliance issues.

7. **Underground Process/Wastewater Lines:** All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing so that an OCD representative may witness the testing.

According to plant personnel, all wastewater lines have been pressure tested. In the future the OCD will be notified of pressure testing as stipulated above.

8. **Onsite/Offsite Waste disposal and storage practices,** are all non-exempt wastes properly characterized and disposed of? Does the facility have an EPA hazardous waste number?

Lab waste is stored onsite - However, personnel were not sure if the waste had been characterized. (They seemed to believe "Laidlaw Environmental" would dispose of the waste.) See Sept. 9, 1996 letter from OCD pg. 2 point number 3.

9. **Class V Wells:** Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

Class V well is being investigated. Lab waste is no longer discharged to septic. The lab waste is currently stored onsite pending characterization for proper disposal.

10. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure. Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

No compliance issues.

11. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD District Office.

No compliance issues. Operators said they notify Salt Lake City, who then notify the proper agencies.

12. **Does the facility have any other potential environmental concerns/issues?**

No other compliance issues other than
the class V well which is being addressed
by Williams Field Services and their
consultant Philip environmental.

13. **Does the facility have any other environmental permits - i.e. SPCC, Storm water Plan, etc?**

Question not asked of operations personnel.

WFS

GW- 60 (PHOTOS BY OCD)



PHOTO NO. 1

DATE: 10/21/96



PHOTO NO. 2

DATE: 10/21/96

WFS GW- 60 (PHOTOS BY OCD)



PHOTO NO. 3

DATE: 10/21/96

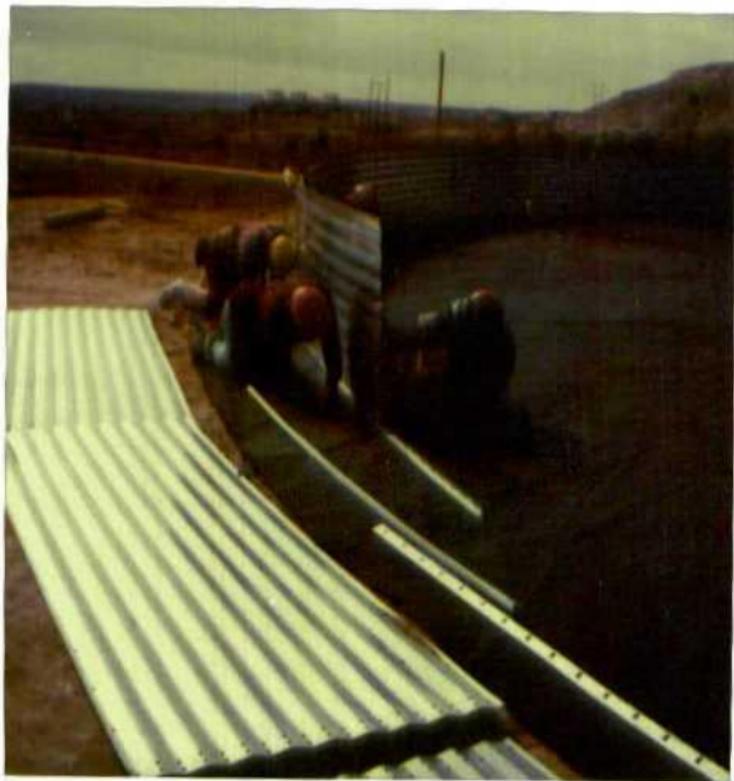
~~NO
Photo NUMBER
4~~

PHOTO NO. 4

DATE: 10/21/96



2/27/91 Milagro Plant
3rd pit



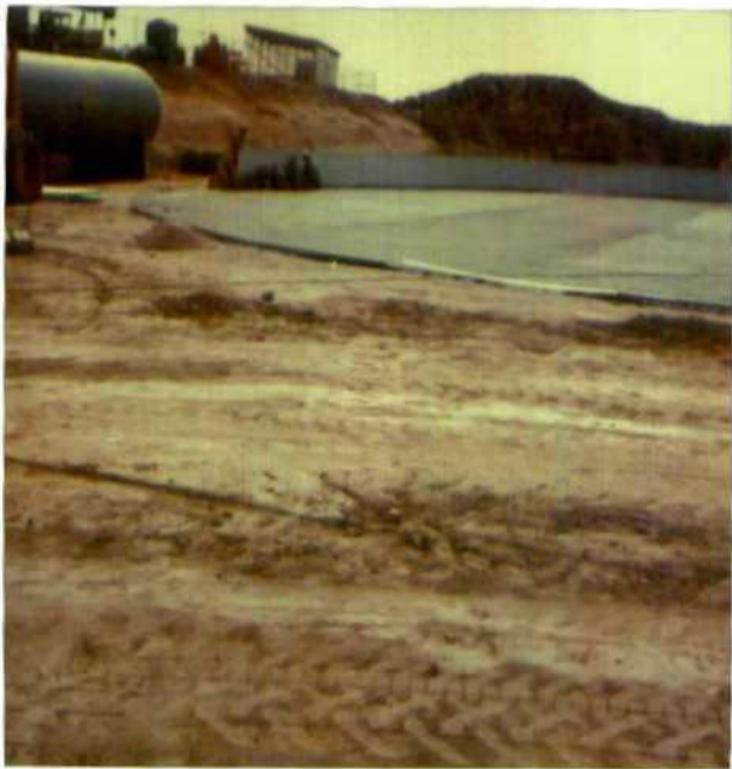
2/27/91 Mikagro Plant
2nd pit



2/26/91 Milagro Plant
1st Pit



Milagro 2/21/91
3rd pit



milavgro 2/22/91



Milargo 2/25/91
1st pit



11/1/1990 2/25/91
2nd pit



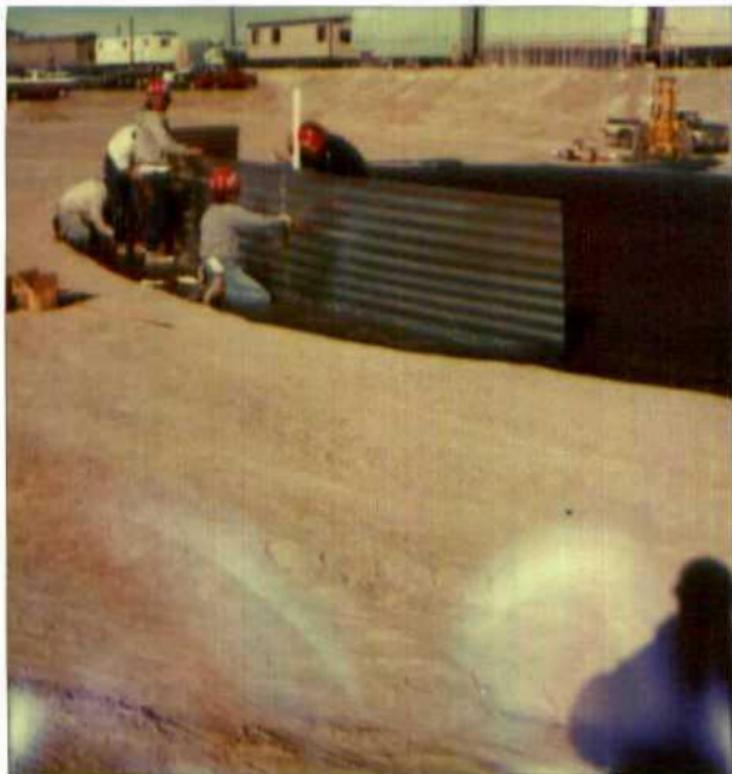
Milagro 2/22/91



Milavro 2/25/91
1st PIT



Milargvo 2/21/91
2nd pit



Milagro 2/21/91



2/25/77 Milagro
1st Pit