

GW - 61

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

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2006-1989

RECEIVED

2007 NOV 13 AM 11 55



Environmental Department  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4625  
505/632-4781 Fax

November 7, 2007

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

RE: Update to Williams Four Corners, LLC OCD Discharge Plans

Dear Mr. Lowe,

Williams Four Corners, LLC (Williams) would like to update the "Description of Final Disposition" for wastes generated at its facilities, and to include clarification of sources of waste streams not previously specified in its existing OCD Discharge Plans. These items are discussed in Table 1, "Storage and Disposal of Process Fluids, Effluent and Waste Solids", and Table 2, "Source, Quantity, and Quality of Effluent and Waste Solids", in each of Williams' current facility-specific OCD Discharge Plans. (Note that in older plans, these table numbers are reversed).

More specifically, the updates to Table 1 include replacing language that stated waste would be disposed at a "NMOCD-approved" or simply "approved" disposal facility with text that states waste will be disposed at "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." Recently, Williams has had some difficulty using NMED-approved disposal sites due to the current language.

Updates to Table 2 include expanding the "Source" of "Used Process Filters" to include amine filters, charcoal, activated carbon, and molecular sieve in addition to the air, inlet, fuel, fuel gas and glycol filters typically included in the Discharge Plans. Additionally, the "Source" of "Condensate and/or Produced Water" has been expanded to include the inlet scrubber, gas inlet separator, and dehydrators. These changes are included for clarification purposes only and provide a more descriptive list of waste that may be generated at the facilities. All of the items listed are related to existing processes at the facilities.

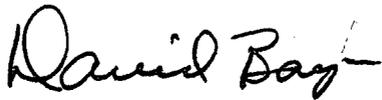
Please see the attached Table 1 and Table 2, from the recent OCD Discharge Plan renewal application for Williams' Rosa Compressor Station, for an example of how the updates apply at a typical Williams' facility. The updated information is indicated by bold text. We will update this information in each OCD Discharge Plan as it comes up for renewal. In the meantime, we request that the updates described herein are effective immediately for the sites listed below upon your receipt of this letter.

Five Points (GW-078)  
29-6#2 (GW-121)  
29-6#3 (GW-198)  
29-6#4 (GS-122)  
30-5 (GW-108)  
31-6 (GW-118)  
32-7 (GW-117)  
32-8#2 (GW-111)  
32-8#3 (GW-116)  
32-9 (GW-091)  
Aztec (GW-155)  
Blanco (GW-327)  
Cabresto (GW-352)  
Carracas (GW-112)  
Cedar Hill (GW-087)  
Chaco (GW-331)  
Coyote (GW-250)  
Crouch Mesa (GW-129)  
Culpepper (GW-353)  
Decker Junction (GW-134)  
Dogie (GW-330)  
El Cedro (GW-149)  
Glade (GW-321)  
Hare (GW-343)  
Honolulu (GW-315)  
Horse Canyon (GW-061)  
Horton (GW-323)  
Kernaghan (GW-271)

La Cosa (GW-187)  
Laguna Seca (GW-307)  
La Jara (GW-223)  
Lateral N-30 (GW-256)  
Lawson Straddle (GW-322)  
Lybrook (GW-047)  
Manzanares (GW-062)  
Martinez (GW-308)  
Middle Mesa (GW-064)  
Milagro (GW-060)  
Navajo (GW-182)  
North Crandell (GW-310)  
Pipkin (GW-120)  
Pritchard (GW-274)  
Pump Mesa (GW-063)  
Quintana Mesa (GW-309)  
Richardson (GW-320)  
Sims Mesa (GW-068)  
Snowshoe (GW-287)  
Thompson (GW-328)  
Trunk A (GW-248)  
Trunk B (GW-249)  
Trunk C (GW-257)  
Trunk L (GW-180)  
Trunk M (GW-181)  
Trunk N (GW-306)  
Wildhorse (GW-079)

These updates are not significant and do not pose a hazard to public health or undue risk to property. These facilities do not discharge wastewater to surface or subsurface waters. All wastes generated at these facilities are temporarily stored in tanks or containers.

Respectfully submitted,



David Bays  
Senior Environmental Specialist

Attachment

**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	500 gal*	Berm or 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.
Produced Water/Natural Gas Condensate	Above Ground Storage Tank	300 bbl 120 bbl 40 bbl	Berms	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at <b>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.</b>
Wash-down Water	Below Grade Sump, vaulted	70 bbl 45 bbl	Dual-walled tanks	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to <b>any facility permitted by any state, federal, or tribal agency to receive industrial solid waste</b> ; or evaporation at Williams' facility may be considered. <b>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.</b>
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 <b>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.</b> 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 <b>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.</b> 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 <b>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.</b> 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.
Antifreeze	Above Ground Storage Tank		Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	500 gal* 125 gal* 100 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	500 gal*	Berm or 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.

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

<b>PROCESS FLUID / WASTE</b>	<b>SOURCE</b>	<b>QUANTITY (Ranges)</b>	<b>QUALITY</b>
Produced Water/Natural Gas Condensate	<b>Inlet Scrubber, Gas Inlet Separator, Dehydrators</b>	2000-8000 bbl/year	No Additives
Waste Water /Wash Down Water	Compressor and Dehy Skids	100-5000 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
<b>Used Process Filters</b>	<b>Charcoal, Activated Carbon, Molecular Sieve</b>	<b>50-500 cubic yd/yr</b>	<b>No Additives</b>
Used Process Filters	<b>Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Amibitol</b>	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

2006 AUG 23 AM 11 44



Environmental Department  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4606  
505/632-4781 Fax

August 22, 2006

Mr. Wayne Price  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Re: Change of Company Name

Dear Mr. Price;

In accordance with Conditions of Discharge Plan Approval attached to each discharge plan approved by the New Mexico Oil Conservation Division, we hereby provide notice of a change of ownership for the Williams facilities identified in the attached table to Williams Four Corners, LLC.

As a corporate strategy, Williams has created regional limited liability corporations for our assets. So, although a new corporation has been created, Williams Four Corners LLC is still a wholly-owned unit of Williams, and there is no change of corporate ownership for these facilities. Williams will continue to comply with the terms and conditions of all approved discharge plans. All other administrative items (responsible official, environmental contacts, mailing addresses, etc.) remain unchanged.

If you have any questions, please call David Bays, Senior Environmental Specialist, at (505) 632-4951 or Ingrid Deklau of Cirrus Consulting at (801) 583-3107.

Sincerely,

A handwritten signature in cursive script that reads "David Bays".

David Bays  
Senior Environmental Specialist

Attachments

xc: Clara Cardoza  
Monica Sandoval  
WFS FCA file 210

# AFFIDAVIT OF PUBLICATION

Ad No. 52868

## STATE OF NEW MEXICO County of San Juan:

CONNIE PRUITT, being duly sworn says:  
That she is the ADVERTISING MANAGER of  
THE DAILY TIMES, a daily newspaper of  
general circulation published in English at  
Farmington, said county and state, and that  
the hereto attached Legal Notice was  
published in a regular and entire issue of the  
said DAILY TIMES, a daily newspaper duly  
qualified for the purpose within the meaning of  
Chapter 167 of the 1937 Session Laws of the  
State of New Mexico for publication and  
appeared in the Internet at The Daily Times  
web site on the following day(s):

Thursday, January 26, 2006.

And the cost of the publication is \$248.28.

Connie Pruitt

ON 1/30/06 CONNIE PRUITT  
appeared before me, whom I know personally  
to be the person who signed the above  
document.

Wynell Corey  
My Commission Expires November 17, 2008.

## COPY OF PUBLICATION

918

Legals

### NOTICE OF PUBLICATION

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

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

(GW-060) - Williams Field Service, Clara Cardoza, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Milagro Gas Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 gallons per day of process wastewater will be disposed of in open top evaporation tanks with a synthetic impervious liner and leak detection system. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth of 40 feet with a total dissolved solids concentrations of 5800 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-061) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Horse Canyon compressor station located in the NE/4 NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth of 380 feet with a total dissolved solids concentrations of approximately 3150 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-327) - Williams Field Service, Mark J. Baretz, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Blanco compressor station located in the NW/4 SW/4, Section 32, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. All effluents generated on site are collected in containment vessels prior to transport to an OCD approved off-site disposal facility. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 100 to 150 feet with a total dissolved solids concentrations ranging from 200 to 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-328) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Thompson compressor station located in the SE/4 SE/4, Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 90 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-331) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Chaco compressor station located in the SE/4 SW/4, Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-343) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Hare Compressor Station located in the SE/4 NW/4, Section 24, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of produced water is collected in a covered below grade vaulted tank prior to transport to an OCD approved off-site disposal facility. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations

NOTICE OF PUBLICATION

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(GW-061) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Horse Canyon compressor station located in the NE/4 NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. 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. Groundwater most likely to be affected by an accidental discharge is at a depth of 380 feet with a total dissolved solids concentrations of approximately 3150 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-327) - Williams Field Service, Mark J. Baretts, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Blanco compressor station located in the NW/4 SW/4, Section 32, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. All effluents generated on site are collected in containment vessels prior to transport to an OCD approved off-site disposal facility. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 100 to 150 feet with a total dissolved solids concentrations ranging from 200 to 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-328) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Thompson compressor station located in the SE/4 SE/4, Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit ad-

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. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 90 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-331) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Chaco compressor station located in the SE/4 SW/4, Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-343) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Hare Compressor Station located in the SE/4 NW/4, Section 24, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of produced water is collected in a covered below grade vaulted tank prior to transport to an OCD approved off-site disposal facility. The dis-

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. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-233) - Williams Field Service, Mark J. Baretts, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their La Jara compressor station located in the NW/4 NW/4, Section 17, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. All waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit 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. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 325 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-330) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Dogie compressor station located in the NW/4 NW/4, Section 4, Township 25 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD ap-

posed discharge plan or its modification. The Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comment may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

(GW-002) - Duke Energy Field Services, LP, Mr. Tony R. Lee, Asset Manager, 1625 West Marland, Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Snakebite Booster Station located in the SE/4 SW/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Current facility operations are limited to ground water remedial operations and removal of minimal pipeline liquids from the natural gas gathering system. The operator does not propose to discharge effluent or waste solids on site, all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable state and federal regulations. Groundwater most likely to be affected by an accidental discharge is at a depth of 85 feet with a total dissolved solids concentration of 600 mg/l. The discharge permit 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.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to

the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information presented at the hearing.

If no hearing is held, the Director will approve the plan based on the information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 1st day of December 2005.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION SEAL MARK FEISMI P.E., Director Legal #78314 Pub. January 27, 2006



Environmental Affairs  
188 CR 4900  
Bloomfield, NM 87413  
505/632-4625  
505/632-4781 Fax

December 13, 2005

Mr. Jack Ford  
New Mexico Oil Conservation Division  
Water Quality Management Fund  
1220 S St. Francis Dr.  
Santa Fe NM 87505

**Re: Discharge Plan for Hare and Horse Canyon**

Dear Mr. Ford:

Please find replacement tables for Hare and Horse Canyon Discharge Plan renewals mailed to you last week. Would you please replace these into the Plans?

Williams Field Services appreciates your assistance in handling these applications and fees. If you have any questions or require additional information, please contact me at 505/632/4625.

Thank you,

A handwritten signature in cursive script that reads "MSandoval".

Monica Sandoval  
Environmental Compliance

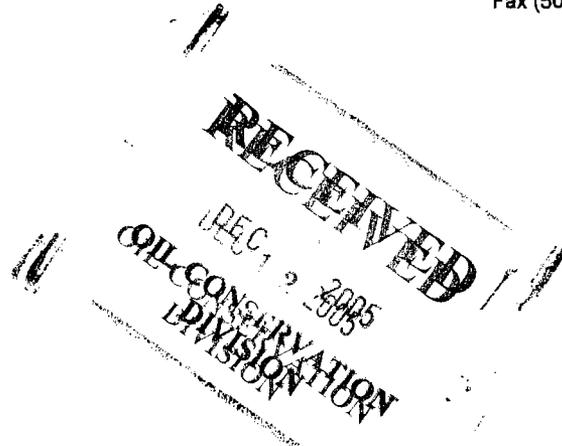
Xc: Denny Foust, Aztec, OCD Dist III  
FCA Environmental File 220



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

December 9, 2005

New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505



Dear Sirs:

Please find enclosed the original plus one copy of the Discharge Plan, renewal applications for the Williams Field Services Co. ("WFS") Hare, Horse Canyon and Thompson Compressor Stations. Also enclosed is WFS check number 4027007383 in the amount of \$300.00 in payment of the filing fee (\$100.00 per facility).

If you need any additional information please call me at (505) 634-4951, or Ms. Monica Sandoval at (505) 632-4625.

Sincerely yours,

David Bays, REM  
Sr. Environmental Specialist

cc: w/ attachment  
Mr. Denny Foust - OCD - Aztec  
File 220 - Hare Station  
File 220 - Horse Canyon Station  
File 220 - Thompson Station

*Wrong amount  
Returned check  
12-13-05  
JF*

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

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

from Williams Field Services

for Hare C.S.  
Horse Canyon C.S.  
Thompson C.S.

GW-343  
GW-561  
GW-328

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

Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee  New Facility \_\_\_\_\_ Renewal

Modification \_\_\_\_\_ Other \_\_\_\_\_ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment  or Annual Increment \_\_\_\_\_

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. IT ALSO HAS A REFLECTIVE WATERMARK ON THE BACK.

Williams

Customer Support 1-866-749-8669

DATE 12/19/2005

PAY TO THE ORDER OF

PAY \$\*\*\*\*\*300.00

USD

NEW MEXICO OIL CONSERVATION DIV  
1220 S ST FRANCIS DR

SANTA FE  
UNITED STATES

NM 87505

[Signature]  
Authorized Signer

SUPPLIER NUMBER  
403816



District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Revised June 10, 2003

Submit Original  
Plus 1 Copy  
to Santa Fe  
1 Copy to Appropriate  
District Office

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS,  
REFINERIES, COMPRESSOR, GEOTHERMAL FACILITIES  
AND CRUDE OIL PUMP STATIONS**

(Refer to the OCD Guidelines for assistance in completing the application)

New       Renewal       Modification

1. Type: Compressor Station (Horse Canyon Compressor Station, GW-061)

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, NM 87413

Contact Person: David Bays

Phone: 505-634-4951

3. Location: Section 27      Township 30 North      Range 9 West  
Submit large scale topographic map showing exact location.

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

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

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

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

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

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

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

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

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

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

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

Name: David Bays

Title: Sr. Environmental Specialist

Signature: David Bays

Date: 12/09/05

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

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OIL CONSERVATION  
DIVISION  
DEC 13 2005



## Horse Canyon Compressor Station

NMOCD  
Discharge Plan  
GW-061

Williams Field Services  
188 CR 4900  
Bloomfield, NM 87413



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## 1.0 TYPE OF OPERATION

The Horse Canyon Compressor Station was built in 1991 to provide metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Milagro Plant.

## 2.0 LEGALLY RESPONSIBLE PARTY

Williams Field Services  
188 CR 4900  
Bloomfield, NM 87413  
(505) 634-4951

Contact Person:  
David Bays, Senior Environmental Specialist  
Phone and Address, Same as Above

## 3.0 LOCATION OF FACILITY

The Horse Canyon Compressor Station is located in Section 27, Township 30 North, Range 9 West, in San Juan County, New Mexico, approximately 13.3 miles east of Aztec, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangles: Archuleta and Turley, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

## 4.0 LANDOWNER

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

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

## 5.0 FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site allows the operation of fourteen 1390-hp engines and ten dehydrators. Currently, five engines and four dehydrators exist at the site. Compressors and dehydrators may be installed or removed to meet demand. A wastewater evaporation operation is also located on site. In addition, there are various storage tanks, support structures and ancillary equipment.

## 6.0 SOURCE, QUANTITY AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

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



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

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, certain absorbents, spill residues, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, laboratory waste, empty drums, and waste water. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

Non-exempt waste management will be conducted in accordance with NMOCD requirements including the preparation of a Certificate of Waste Status for each non-exempt waste stream. Non-exempt wastes will be analyzed at a minimum for BTEX, TPH, RCRA D-List metals, ignitability, corrosivity, and reactivity to initially determine if such waste are hazardous as defined in 40 CFR Part 261. All wastes at the facility will be periodically surveyed for naturally occurring radioactive material (NORM) to determine if the concentrations of radium 226 exceed 30 picocuries per gram or if radiation exposure exceeds 50 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.

## 8.0 STORM WATER PLAN

This storm water section was developed to provide a plan to monitor and mitigate impact to storm water runoff from the facility. It serves to satisfy storm water management concerns of the NMOCD. It is not intended to comply with 40 CFR Part 122, Storm Water Discharges as this facility is excluded in 122.26 (c) (1) (iii).

This section concentrates on the identification of potential pollutants, inspection and maintenance of the pollutant controls, and gives a description of structural controls to prevent storm water pollution.

### 8.1 Site Assessment and Facility Controls

An evaluation of the material used and stored on this site that may be exposed to storm water indicates that no materials would routinely be exposed to precipitation. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms, curbs, or emergency response actions, could flow overland to open off-site drainage ditches (arroyos) and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.



## 8.2 Best Management Practices

Following are Best Management Practices (BMPs) to be implemented to prevent or mitigate pollution to storm water from facility operations:

- All waste materials and debris will be properly disposed of on an on-going basis in appropriate containers and locations for collection and removal from the site.
- Temporary storage of potential pollutant sources will be located in areas with appropriate controls for storm water protection. This would include ensuring all containers are sealed/covered and otherwise protected from contact with precipitation.
- Periodic inspection of channels and culverts shall be performed at least twice annually and after any major precipitation event.
- Sediment deposits and debris will be removed from the channels and culverts as necessary and any erosion damage at the outfall (if any) will be repaired or controlled.
- Conduct inspections of the facility on a regular basis as part of the preventive maintenance site check. Such inspections will include the visual assessment of corroded or damaged drums and tanks, broken or breached containment structures, collapsed or clogged drainages or drain lines.

Implementation of the BMPs will prevent or mitigate impact to storm water runoff from this facility.

## 9.0 INSPECTION, MAINTENANCE AND REPORTING

Williams' personnel will operate and maintain the facility. The facility will be remotely monitored for equipment malfunctions and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. Regular inspections will be conducted throughout the facility. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

In the event of a release of a reportable quantity, the operator reports the release to a contracted spill notification service. The service immediately notifies the Williams Environmental Department and all appropriate agencies.

## 10.0 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Spill containment berms around above ground storage tanks will be designed to contain 133% of the tank capacity. The below-grade tanks will be constructed with a means of leak detection, and will either be double-walled tanks, double-bottomed tanks or a tank set on an impermeable pad.

Williams' corporate policy and procedure for Release Reporting and Pollution Prevention and Control are included in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).



### 11.0 SITE CHARACTERISTICS

The Horse Canyon Compressor Station is located approximately 13.3 miles east of Aztec, New Mexico. The site elevation is approximately 5,970 feet above mean sea level. The natural ground surface topography slopes downward toward the south. The maximum relief over the site is approximately 20 feet. Intermittent flow from the site will follow the natural drainage to the south towards an unnamed drainage. The nearest down-gradient perennial source of surface water to the site is the San Juan River, located approximately 1.9 miles south of the site at an elevation of approximately 5,600 feet.

A review of the available hydrologic data (1,2) for this area revealed that there are no water wells within a ¼-mile radius of Horse Canyon 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 200 to 400 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 PPM.

The table below presents available information provided for the nearest well to the site.

Township; Range; Section	Quarter <sup>a</sup>	Apx. Distance from Site (mi)	Well #	Use <sup>b</sup>	Well Depth (ft)	Water Bearing Stratifications (ft)	Description	Depth to Water (ft)
30N; 9W; 33	444	~1.6	SJ 02092	Dom	32	24-29	Shallow Alluvium/Basin Fill	15
30N; 9W; 36	3	~1.6-2.0	SJ 02298	Dom	15	4-15	Sandstone/Gravel/Conglomerate	4

Note a: 1=NW/4; 2=NE/4; 3=SW/4; 4=SE/4

Note b: Dom = domestic

The 100-year 24-hour precipitation event at a regional weather station is 2.8 inches. This small amount of rainfall for the area should pose minimal flood hazards. When practical, surface water runoff from the area surrounding the site is to be diverted around the facility into the natural drainage path. Vegetation in the area consists predominantly of sagebrush and native grasses.

### References

<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, 2005.



Effective Date:

December 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.

# TABLES

**TABLE 1**  
**SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS**  
**HORSE CANYON COMPRESSOR STATION**

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Produced Water/ Natural Gas Condensate	Dehydrator, Scrubber, Gas Inlet Separator	2000-5000 bbl/year	No Additives
Waste Water/Wash Down Water	Compressor Skid; Hauled in for evaporation	1000-5000 gal/year/engine; 10,000-20,000 bbl/yr	Biodegradable soap and tap water with traces of used oil
Glycol	Waste water evaporation equipment; Dehydrator	1000-12,000 bbl/yr	No Additives
Evaporation Solids	Liquid Containers	10-40 bbl/yr	No Additives
Used Oil	Compressor; Waste Water Evaporation Equipment	1000-2000 gal/year/engine; 600-1200 bbl/yr	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	200-500/year/engine	No Additives
Used Process Filters	Air, Inlet, Fuel Gas	200-500/year	No Additives
Empty Drums/Containers	Liquid Containers	0-80/year	No Additives
Spill Residue ( i.e. soil, gravel, etc)	Incidental Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incidental Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives

**TABLE 2**  
**TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS**  
**HORSE CANYON COMPRESSOR STATION**  
**Natural Gas Compression Operations**

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Produced Water/Natural Gas Condensate	Above Ground Storage Tank	300 bbl	Berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Waste Water/Wash-down water	Above Ground Storage Tank	165 bbl	Berm and vault	Non-exempt	Water may be evaporated at Williams evaporation facility or transported to a NMOCD-approved disposal facility.
Used Oil	Above Ground Storage Tank	165 bbl	Berm	Non-exempt	May be hauled to WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Spill Residue (i.e., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI. Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	2 @ 500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	6 @ 100 gal* & 50 gal*	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above Ground Storage Tank	100 bbl; 6 @ 500 gal*	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Emulsion Breaker	Above Ground Storage Tank	125 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Corrosion Inhibitor	Above Ground Storage Tank	525 gal; 125 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Solvent Tank - petroleum Degreaser - water based	Above Ground Storage Tank	400 gal; 400 gal	Metal tank; concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

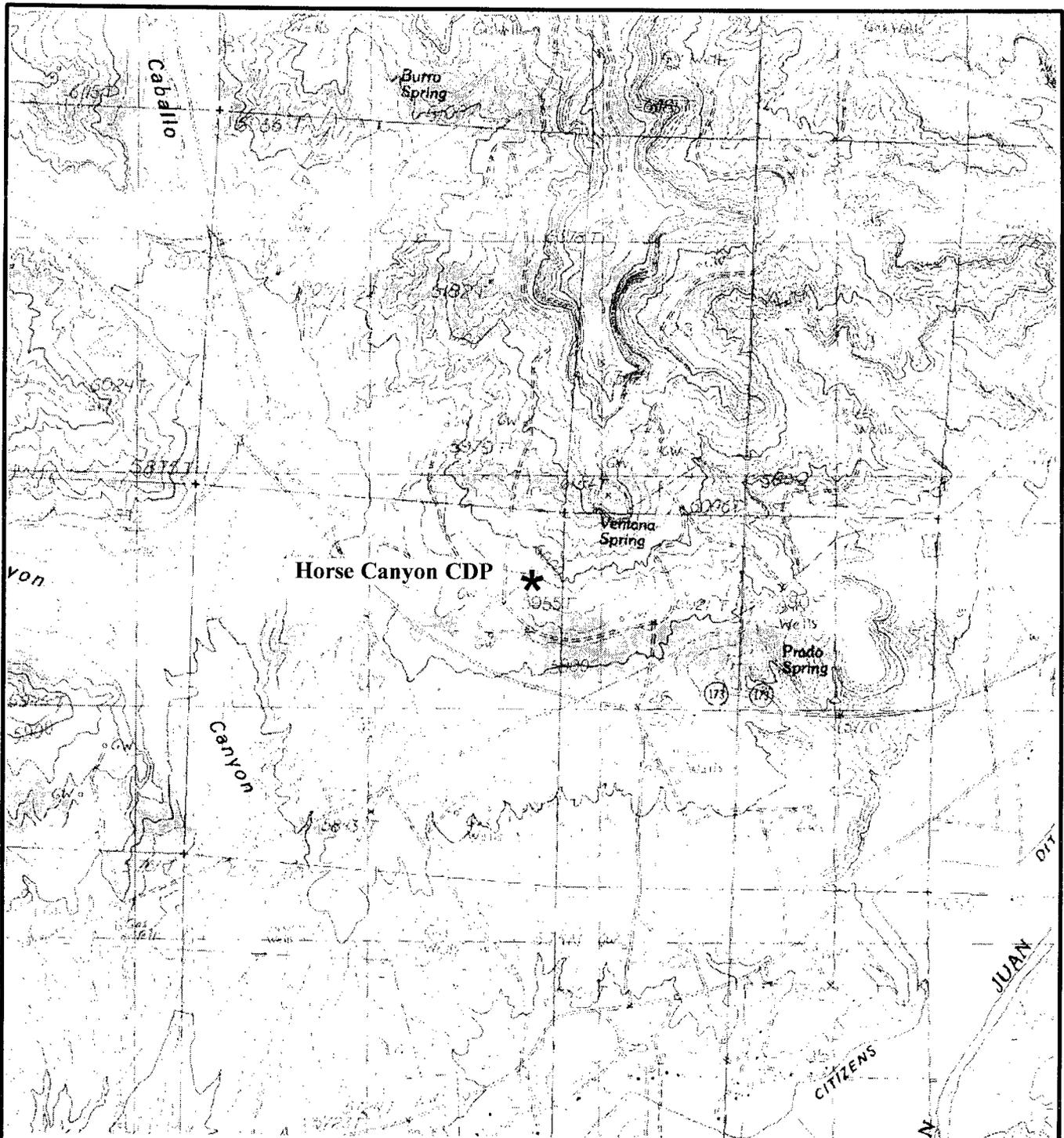
\*Number of tanks varies with number of compressors or dehy's installed.

**TABLE 2**  
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**HORSE CANYON COMPRESSOR STATION**  
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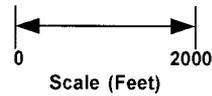
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Spill Residue (i.e., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	2 @ 500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
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Solvent Tank - petroleum Degreaser - water based	Above Ground Storage Tank	400 gal; 400 gal	Metal tank; concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

\*Number of tanks varies with number of compressors or dehy's installed.

**FIGURES**



Source: USGS Archuleta and Turley, NM Quadrangles



**Figure 1 Site Vicinity / Topographic Map  
Horse Canyon CDP Compressor Station**

Section 27, Township 30N Range 9W  
San Juan County, New Mexico



# APPENDICES

**Appendix A**  
**WFS Spill Control Procedures**

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

## 1.0 PURPOSE

- 1.1 To determine conditions under which facilities are subject to the requirements of the EPA Oil Pollution Prevention program, specify the actions required at facilities to comply with pollution prevention and/or response plans, and to ensure facilities are in compliance with all applicable oil pollution prevention regulations.

## 2.0 PROCEDURE

### 2.1 Pollution Prevention Plans

- 2.1.1 The oil pollution prevention regulations include two plans related to non-transportation onshore facilities. The most common is the Spill Prevention Control and Countermeasure (SPCC) Plan. The second is the Facility Response Plan (FRP).

2.1.1.1 An SPCC Plan is a written document that describes the steps a facility takes to prevent oil spills and to minimize the risk of harm to the environment.

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

- 2.1.2 The Environmental Specialist is responsible for:

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

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

2.1.2.3 Communicating plan requirements with Operations.

2.1.2.4 Providing site-specific training to Operations.

2.1.2.5 Scheduling and performing an Annual SPCC facility inspection.

**NOTE**

If your facility requires a Facility Response Plan (FRP), it will include an Emergency Response Plan (referred to as an Emergency Response Action Plan (ERAP) by the EPA regulations). A separate ERP specified by SIP-ADM-12.01 – Emergency Response and Planning is not required. See 6.04-ADM-003 – Plans Required for Facilities-Pipelines to determine the plans applicable to your facility/pipeline.

**2.1.3 Operations is responsible for:**

- 2.1.3.1 Providing initial and Annual review of plan(s), providing comments to the Environmental Specialist (ES) and meeting published timeframes for reviews and comments.
- 2.1.3.2 Ensuring it is capable of complying with Plan requirements, including monitoring, recordkeeping, and reporting.
- 2.1.3.3 Performing inspections required by the plan(s).
- 2.1.3.4 Maintaining documentation required by the plan(s) on the appropriate forms.
- 2.1.3.5 Conducting annual drills if an FRP is in place for the facility.
- 2.1.3.6 Ensuring adequate response contractors are available in the area.
- 2.1.3.7 Performing visual inspections of oil storage tanks and containers (single containers with capacities >55 gallons) for signs of deterioration, discharges or accumulation of oil inside diked areas at least Annually. Document Inspections on 0019 – External Visual Tank Inspection form.
- 2.1.3.8 Maintaining all inspection logs, secondary containment drainage logs, etc., for a period of 5 years. These records must be maintained in a centralized location at the facility and must be easily accessible to an inspector.
- 2.1.3.9 Coordinating training for all personnel with the Environmental Specialist as part of the required annual review.
- 2.1.3.10 Perform maintenance or repairs necessary to prevent or stop leaks or releases and document the work following company maintenance and repair procedures.

- 2.1.3.11 Documenting routine releases of storm water from containment areas shall be documented on WES-87 – Record of Secondary Containment Discharge. All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.

### 3.0 REFERENCES

#### 3.1 Regulatory

- 3.1.1 Oil Pollution Prevention Act of 1990
- 3.1.2 40 CFR 112, Oil Pollution Prevention (EPA)
- 3.1.3 Applicable state, regional and local regulations

#### 3.2 Related Policies/Procedures

- 3.2.1 Training CD for SPCC Plans
- 3.2.2 SIP-ADM-7.15 - Aboveground Storage Tank Integrity

#### 3.3 Forms and Attachments

- 3.3.1 WES-87 – Record of Secondary Containment Discharge
- 3.3.2 WES-35 - Release Report Form
- 3.3.3 6.04-ADM-002 - Release Reporting
- 3.3.4 6.04-ADM-003 – Plans Required for Facilities-Pipelines
- 3.3.5 0019 – External Visual Tank Inspection
- 3.3.6 SIP-ADM-12.01 - Emergency Response and Planning
- 3.3.7 Spill Prevention Control and Countermeasure (SPCC) Plan
- 3.3.8 Facility Response Plan
- 3.3.9 SIP Feedback/Change Request

### 4.0 DEFINITIONS

- 4.1 **Aboveground Storage Tank (AST)** – A tank that has all its surfaces above the existing grade so as to allow visual inspection of all the tank surfaces.
- 4.2 **EPA** – Environmental Protection Agency
- 4.3 **Facility** – Any terminal, facility, pipeline, etc. owned or operated by Williams.

- 4.4 Facility Response Plan** - Required for any non-transportation related facility that could be expected to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines.
- 4.5 Oil** – Oil of any kind or any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. The EPA accepts the definition of oil as the list provided by the USCG at <http://www.uscg.mil/vrp/faq/oil.shtml>.
- 4.6 Oil Pollution Act (OPA) of 1990** – OPA 1990 requires regulated facilities to submit spill response plans that address the facility owner's or operator's ability to respond to a "worst-case discharge." OPA 90 is being implemented by EPA under 40 CFR 112, Oil Pollution Prevention, Section 112.20, Facility Response Plans.
- 4.7 Oil Spill Response Plan** – An Oil Spill Response Plan provides information on responding to a spill at a facility and is intended to satisfy the requirements of the Oil Pollution Act of 1990; Facility Response Plan requirements of 40 CFR 112, Oil Pollution Prevention (EPA); Pipeline Response Plan requirements of 49 CFR 194, Response Plans for Onshore Oil Pipelines (RSPA); Facility Response Plan requirements of 33 CFR 154 Subpart F, Response Plans for Oil Facilities (USCG); and 30 CFR 254, Oil-Spill Response Requirements for Facilities Located Seaward of the Coast Line (MMS).
- 4.8 Release** – synonymous with spill in this document. Williams' definition of a release is contained in the Release Reporting Guidelines which is maintained by the Environmental Group.
- 4.9 Spill Prevention, Countermeasures, and Control (SPCC) Plan** – An SPCC Plan provides information on spill prevention at a facility and is intended to satisfy the requirements of the SPCC Plan requirements in 40 CFR 112, Oil Pollution Prevention.
- 4.10 USCG** – United States Coast Guard

➤➤➤End of Procedure◀◀◀

### System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
9/15/04	2.1	Deleted for manned facilities Deleted daily facility Deleted for unmanned facilities perform daily inspections. Added Document Inspections on 0018 – Visual External Inspections.
	2.2	New - Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with <u>SIP-ADM-7.15 - Aboveground Storage Tank Integrity</u> Renumbered
	2.5	New Routine releases of storm water from containment areas shall be documented on <u>WES-87 – Record of Secondary Containment Discharge</u> . All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
	2.5	Deleted: When to Initiate 2.5.1 The first person to discover a spill/release at a facility will immediately take appropriate action to protect life, and ensure safety of personnel. An attempt will be made to mitigate the effects of the spill by terminating operations, closing valves, or taking other measures to stop the leak or spill as long as personnel are not in danger. 2.5.2 For onshore releases: If the spill is reportable (refer to <u>6.04-ADM-002 - Release Reporting</u> procedure), the appropriate person (usually person discovering the release) will immediately notify the 24 hour O&TS release hotline at 1-888-677-2370 and, if necessary, local emergency response personnel/contractors.
		<p style="text-align: center;"><b>NOTE</b></p> The current 24 hour O&TS release hotline is managed by a contractor, 3E. 3E provides 24-hour service/support, to include reporting major incidents and providing on-demand MSDSs.
		2.5.3 Offshore releases: If the spill creates a sheen (refer to <u>6.04-ADM-002 - Release Reporting</u> procedure), the appropriate person (usually person discovering the release) will immediately notify O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and the Environmental Specialist or

		<p>his/her management team.</p> <p><b>2.5.4 Receiving and reviewing the initial release report</b></p> <p>2.5.4.1 Onshore releases: Within 24 hours, 3E will distribute an initial release report to the Area. The initial distribution will be made via Area e-mail boxes.</p> <p>2.5.4.2 Each person that receives an initial report is required to review the report for correctness and clarity. All corrections must be provided to 3E in a return e-mail within 4 working days of receipt.</p> <p>2.5.4.3 Offshore releases: The ES will complete the <u>WES-35 - Release Report Form</u> and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt.</p> <p><b>2.5.5 Receiving a final release report</b></p> <p>2.5.5.1 Onshore releases: 3E will gather the corrections from the initial release report and distribute a final report within 5 days of the release. The final report is sent to a distribution list controlled by Williams.</p> <p>2.5.5.2 Off-shore releases: The ES or Compliance Administrator will gather corrections and distribute the final report to all stakeholders using the appropriate area and final distribution lists.</p> <p><b>2.5.6 Providing Follow-up Information on the Release</b></p> <p>2.5.6.1 The Operations Manager or his/her designee shall notify the local Environmental Specialist of the specific response measures taken to respond to the release and all follow-up actions that were taken as a result of the spill or release, if this information was not reported to 3E. It is recommended that the update be provided within 2 workdays of the actions being completed.</p>
	2.6 Note Box	Added See <u>6.04-ADM-003 – Plans Required for Facilities- Pipelines</u> to determine the plans applicable to your facility/pipeline.
	2.6.6	Added This training may be coordinated with the Environmental Specialist as part of the required annual review.
	3.3.4	Added 0018 – Visual External Inspections Renumbered
	4.6	Deleted Hydrocarbons and Other Fluids definition
7-26-05	Entire document	Rearranged, renumbered, rewrote to clarify responsibilities
	Note	Shortened to clarify

	4.0	Deleted definitions not associated with this procedure.
--	-----	---

	<b>System Integrity Plan</b>	System Integrity Plan	Document No. 6.04-ADM-002	
		Revision No. 8	Effective Date. 01/01/06	Page: 1 of 7
Procedure: <p style="text-align: center;"><b>RELEASE REPORTING</b></p>				

## 1.0 PURPOSE

- 1.1 To define the process for reporting releases and certain other events. The terms "release" and "spill" may be used synonymously within this procedure.

**Note 1:**

Due to the rigid timeframes for reporting to regulatory agencies (usually within one hour of an event) and the possibility for penalties associated with delayed reporting, **it is imperative that releases and events requiring reporting by this procedure are reported immediately. If you are unsure of the release amount do not delay reporting by attempting to exactly determine the amount. Report immediately with an estimate, and correct later.**

**Note 2:**

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

## 2.0 PROCEDURE

### 2.1 Offshore Release Reporting (w/sheen on water)

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

2.1.1.1 Any release that causes sheen on water.

2.1.2 OOPS will immediately make the required telephonic notifications and submit written reports to the appropriate regulatory agencies, the appropriate Qualified Individual (QI), and the Environmental Specialist.

### 2.2 Offshore Release Reporting (w/o sheen on water)

2.2.1 Immediately report to your Environmental Specialist and the DOT Compliance Coordinator (Tulsa) the following type(s) of offshore release(s) or event(s):

2.2.1.1 Any Gas release >50 MSCF;

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

2.2.1.3 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or Hazardous Liquids lost **and/or**, costs of clean up or recovery of the operator **and/or** others  $\geq$  \$50,000;

- 2.2.1.4 Any unintentional, non-maintenance related release  $\geq 5$  gallons of a Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;
  - 2.2.1.5 Any release of Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or
  - 2.2.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.3.2.1 through 2.3.1.6.
- 2.2.2 The Environmental Specialist and the DOT Compliance Coordinator will determine reportability and, if required, perform telephonic notifications in accordance with applicable regulations.
- 2.2.3 The Environmental Specialist will complete the WES - 35 Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 10 working days.
- 2.2.4 The Environmental Specialist will complete any required follow-up written reports and/or documentation for non-transportation events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.
- 2.2.5 The DOT Compliance Coordinator will complete any required follow-up reports and/or documentation for transportation related events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.

### 2.3 Onshore Releases

- 2.3.1 Immediately report to 3E Company at 888-677-2370 (toll free) the following type(s) of onshore release(s) or event(s):
- 2.3.1.1 Any liquid release that enters, or is expected to enter, any waterway (i.e., ditch, arroyo, intermittent stream, etc.);
  - 2.3.1.2 Any individual liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.)  $> 1$  gallon;
  - 2.3.1.3 Any cumulative liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.)  $> 5$  gallons within a 24-hour period (drips, pinhole leaks, etc.). (NOTE: Report immediately upon determining, or suspecting that the 5 gallon/24 hour threshold will be met or exceeded);
  - 2.3.1.4 Any Gas release  $> 50$  MSCF;
  - 2.3.1.5 Any event that involves a release of any amount of Gas or hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility **and** a death or personal injury necessitating in-patient hospitalization;

- 2.3.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or hazardous liquids lost and/or, costs of clean up or recovery of the operator **and/or** others  $\geq$  \$50,000;
  - 2.3.1.7 Any unintentional, non-maintenance related release  $\geq$ 5 gallons of a hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;
  - 2.3.1.8 Any release of hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or
  - 2.3.1.9 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.4.1.1 through 2.4.1.8.
- 2.3.2 3E Company will immediately make the required telephonic notifications in accordance with the Telephonic and Written Release Reporting Requirements.
  - 2.3.3 Information that will be needed when reporting to 3E is on WES-35 - Release Report Form.
  - 2.3.4 Refer to the Onshore Release/Spill Notification Flowchart for more information regarding the onshore reporting workflow.
  - 2.3.5 The Environmental Specialist will follow-up with Operations to verify that adequate response and reporting measures have been taken for each release and track closure of each release report with appropriate regulatory agencies.

**Note:**

**Flares and Thermal Oxidizers**

Flares, thermal oxidizers and other pollution control devices typically have permit limits and conditions and may require tracking of flaring and/or other routine and/or non-routine events. Refer to your facility specific permit conditions. Immediately report any exceedance of permit limits or variance from permit to your Environmental Specialist, whom will notify the appropriate regulatory agency(s).

## **2.4 Planned / Scheduled Blowdowns**

- 2.4.1 Notify your Environmental Specialist as far as possible in advance of planned / scheduled blowdowns that are not an exception per 2.5 of this procedure.
- 2.4.2 Be prepared to provide to your Environmental Specialist a current extended chromatographic analysis of the product to be released.

2.4.3 The Environmental Specialist will:

- 2.4.3.1 Review information provided;
- 2.4.3.2 Notify appropriate agencies;
- 2.4.3.3 Obtain required permits or permissions;
- 2.4.3.4 Provide Operations with any special conditions and / or limitations to be observed before, during, and/or after the planned / scheduled blowdown event; and
- 2.4.3.5 Perform any required post event reporting or follow-up to agencies.

## 2.5 Exceptions to Procedure:

- 2.5.1 Sheen on rainwater within facilities, dikes, valve boxes, etc.. that is not the result of a release event. However, one must follow proper disposal and housekeeping practices for these cases.
- 2.5.2 Routine releases to pollution control devices (flares, thermal oxidizers, etc.) **in accordance with permit conditions or limitations.**
- 2.5.3 Site-specific procedures may qualify as an exception, if reviewed and approved by your Environmental Specialist.

## 2.5 Post Report Follow-up (for Remediation and Cost Purposes)

- 2.5.1 Within 45 days of any release that affected soil or water, Operations will submit to the Environmental Specialist the following information:
  - 2.5.1.1 Quantity of soil, water, or product removed as a result of a release;
  - 2.5.1.2 Disposition of soil, water, or product removed (i.e., land, farm, landfill, disposal, etc.);
  - 2.5.1.3 Update of costs incurred because of release. (Includes value of lost product, repair costs response costs, clean up costs, disposal costs, etc.)
  - 2.5.1.4 Environmental Specialist will update release database with additional information from 2.5.1.1 through 2.5.1.3.

## 2.6 Release Database

- 2.6.1 The Tulsa Release Reporting Compliance Specialist will maintain the release database and update with follow-up information from 2.5.1.1 through 2.5.1.3 above.

### 3.0 REFERENCES

#### 3.1 Regulatory

3.1.1 Various regulatory requirements at the State and Federal levels require reporting of releases and/or release events.

3.1.2 49 CFR 191, 192 and 195

#### 3.2 Related Policies/Procedures

3.2.1 SIP-ADM-6.04 - Pollution Prevention and Spill Response

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

#### 3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

### 4.0 DEFINITIONS

**4.1 Liquid** - For the purposes of these reporting criteria, a substance should be considered a liquid if it is transported or stored in liquid form. Liquid releases should be reported using the measurement unit used when transporting the product (i.e., gallons/barrels).

**4.2 Gas** - For the purposes of these reporting criteria, a substance should be considered a gas if it is transported or stored in gaseous state. Gas releases should be reported using the measurement unit used when transporting the product (i.e., m.s.c.f.).

**4.3 Facility Boundary** - The Facility Boundary is the area within the fenced perimeter or the property line. If no fence or clear property line exists, then the facility boundary is that area clearly maintained by Operations (graveled, mowed, cleared, etc.), excluding pipeline rights-of-way.

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

- 4.5 **Onshore Release** - Any release that does not occur offshore in a Tidally Affected Zone.
- 4.6 **Tidally Affected Zone** - Relating to or affected by tides: *the tidal maximum; tidal pools; tidal waters.*
- 4.7 **DOT jurisdictional Pipeline or Pipeline Facility** – Pipeline or pipeline facility subject to 49 CFR Parts 192 or 195.
- 4.8 **Hazardous Liquid** – Per 49 CFR 195.2 - petroleum, petroleum products, or anhydrous ammonia.

➤➤➤End of Procedure<<<<

## System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
04/18/04	2.3.1.3 – 2.3.1.7 and 2.4.2.5 – 2.4.2.9;  4.0 – Definitions; and  2.4.4  Document Header        General	Added reporting requirements from 49 CFR 191, 192 & 195;  Added 4.6, 4.7 and 4.8; Changed "Title E" to "Tidally";  Established link to WES-35 – Release Report Form;  Changed "Energy Services" to "System Integrity Plan," changed revision number from 5 to 6 and changed effective date to 04/19/04; and  Made miscellaneous obvious corrections.
09/15/04	Entire Document	Reordered and rewritten  Added Plans Required of Pipelines/Facilities  Clarified that 3E needs to be called as soon as possible and corrections made later.

**RELEASE/SPILL REPORTING**

**MATERIAL SAFETY DATA SHEETS**

**CHEMICAL EXPOSURES/POISONINGS**

**Dial**

**24HRS/DAY - 7DAYS/WEEK**

**1-888-677-2370**

Info you should have when calling:

- Time of Release/Spill
- Location of the Release
- Asset where Release Occurred
- Amount Released
- Name of Chemical or Product Released



**3E COMPANY**

1905 Aston Avenue, Carlsbad, CA 92008

Telephone: 760-602-8700

Fax: 760-602-8888

Release/Spill Report Form

Month  Day  Year   
 Release Verification Time:  Release Stop Time:   
 Region  District  Area   
 Location Name  Location Identifier   
 Mainline Name  Mainline Identifier   
 Area Manager  Company Asset  State   
 Address  County  Zip Code   
 Release Discovered by:  Time   
 Release Reported by:  Time   
 Section  Township  Range  Milepost  Tract #   
 Offshore  Latitude  Longitude   
 Release Reportable?  Waterway Affected?  Name   

Report	Date	Number	Time	Name	Title	City	State
NRC <input type="checkbox"/>							
SERC <input type="checkbox"/>							
LEPC <input type="checkbox"/>							
TRRC <input type="checkbox"/>							
EPA <input type="checkbox"/>							
Other <input type="checkbox"/>							

 Product Released:  Total BBL's Released   
 Cause of Release:  BBL's Recovered Wet   
 Released To:  Other:  BBL's Recovered Soil   
 BBL's Recovered Total BBL's Recovered   
 BBL's Not Recovered   
 Remarks:   
 Origin Of Release:   
 Temperature  Relative Humidity  Precipitation   
 Cloud Cover  Wind Speed  Wind Direction   
 Injury  Death  Fire  Explosion   
 Unconsciousness  Hospitalization   
 Loss/Damage Estimate   
 Incident Investigator:   
 Environmental Contact for this Release:   
 Safety Contact for this Release:   
 Compliance Administrator for this area:   
 Form completed by:   
 Completion Date:   
 Form was e-mailed to Williams on:

**Appendix B**  
**NMOCD Notification and Corrective Action**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Form C-141  
Revised October 10, 2003

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

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? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

Describe Area Affected and Cleanup Action Taken.\*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:		<b><u>OIL CONSERVATION DIVISION</u></b>	
Printed Name:		Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:	
E-mail Address:	Conditions of Approval:		Attached <input type="checkbox"/>
Date:	Phone:		

\* Attach Additional Sheets If Necessary

**Appendix C**  
**Public Notice**

## PUBLIC NOTICE

### Notice of Discharge Plan Renewal Application

#### Horse Canyon Compressor Station

Pursuant to the requirements of the New Mexico Water Quality Control Commission Regulation 20 NMAC 2.6.2 – GROUND AND SURFACE WATER PROTECTION, Williams Field Services Company of 188 County Road 4900, Bloomfield, NM 87413, hereby announces intent to apply to the New Mexico Oil Conservation Division to renew the Discharge Plan for the Horse Canyon Compressor Station. Williams expects to submit the permit application to the Oil Conservation Division in December 2005.

The facility, located in Section 27, Township 30 North, Range 9 West, San Juan County, New Mexico, approximately 13.3 miles east 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 an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be at least 200 to 400 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

Director of the Oil Conservation Division  
1220 South Saint Francis Dr.  
Santa Fe NM 87505  
(505) 827-1464

Please refer to the company name and site name, as used in this notice, or send a copy of this notice when making inquiries, since the Department might not have received the application at the time of this notice.



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

December 5, 2005

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Horse Canyon Compressor Station (GW-061). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during December 2005.

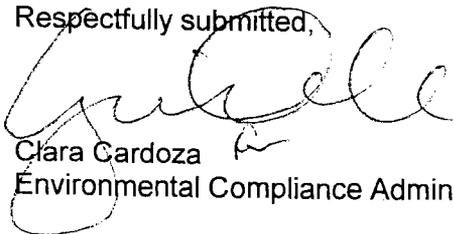
The facility, located in Section 27, Township 30 North, Range 9 West, San Juan County, New Mexico, approximately 13.3 miles east of Aztec, provides natural gas compression and conditioning services.

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 an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be at least 200 to 400 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,



Clara Cardoza  
 Environmental Compliance Administrator

7004 2510 0005 2372 3869

FARMINGTON, NM 87401

0.37	UNIT ID: 0012
2.30	
1.75	
4.42	Clerk: KK4R43
	12/06/05

BLM  
 1235 N. La Plata Hwy  
 Farmington NM 87401



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

April 5, 2005

**Mark E. Fesmire, P.E.**  
Director  
Oil Conservation Division

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

**RE: Field Inspections**

Dear Ms. Garcia:

Attached are copies of the field inspections performed on various William Field Services Company's facilities. These inspections were performed on March 21, 22, and 23, 2005 by New Mexico Oil Conservation Division personnel, Mr. Jack Ford, Mr. Darrel Davis, and Mr. Ed Martin. No photographs were taken during the inspections.

Please review each of the facilities on the attached report and address the comments of items observed during the inspections. No Notice of Violation will be issued as a result of these inspections, however, a number of corrections at the facilities need immediate attention. Kindly inform me as these corrections are made. An e-mail note will be sufficient at this time. My e-mail address is: [jwford@state.nm.us](mailto:jwford@state.nm.us)

If you have any questions please contact me at (505) 476-3489.

Sincerely,

W. Jack Ford, C.P.G.  
Environmental Bureau  
Oil Conservation Division

Attachment

Cc: OCD Aztec District Office

3/22/2005 eWJF0509037684

WFS 32-8 3 CDP CS

Compressor Station

Field Inspection

Normal Routine Activity

Jack Ford

Operator: WILLIAMS FIELD SERVICES CO.

Permit(s) Authorizing Facility GW-116

Samples   
Photos / Etc.   
Docs Reviewed

Violation Detail (If applicable) No Violations Identified - All O.K.

Violation Description

Comments / Action Required Unlabeled drum needs to be labeled. Water in below grade tank pit needs to be pumped out.

Addition Concerns as Checked: Unauth. Release  Drums  Process Area  Pad / Berm / Liner  BG Tanks/Sumps  Labeling  WD Practice  UG Lines  Housekeeping  Class V  Remediations  Storm Water

3/23/2005 eWJF0509043884

WFS HORSE CANYON CS

Compressor Station

Field Inspection

Normal Routine Activity

Jack Ford

Operator: WILLIAMS FIELD SERVICES CO.

Permit(s) Authorizing Facility GW-61

Samples   
Photos / Etc.   
Docs Reviewed

Violation Detail (If applicable) Contamination observed on ground surface

Other (Describe below)

Violation Description

Comments / Action Required Oil stained gravel and soil along the base of all compressor pads. Two compressor units have severe overflow of used compressor oil onto the ground surface. Immediate attention is required to correct this condition. Two soil piles appear to be oil contaminated and require remediation or proper disposal. The floor of the pit containing the produced water tank appears abnormally wet. Produced water tank should be inspected for potential leakage. Hydrocarbon stained soils in pit located between the produced water tank pit and the used oil/lube oil tank pit are improperly located. Soils in this pit are to be removed and placed in a lined bermed area for proper treatment or removed and disposed of properly. Lube oil/used oil tank pit needs removal of excessive water. Saddle tank drums need to be clearly labeled of contents. Out of service white plastic tank needs to be addressed for removal if further use is not intended. Stainless sheetmetal cover of piping has ruptured exposing insulation. If insulation is asbestos, abatement is required for the exposed insulation.

Addition Concerns as Checked: Unauth. Release  Drums  Process Area  Pad / Berm / Liner  BG Tanks/Sumps  Labeling  WD Practice  UG Lines  Housekeeping  Class V  Remediations  Storm Water

3/23/2005 eWJF0509043014

VFS LATERAL N-30 (KOCH-GARDNER) C:

Compressor Station

Field Inspection

Normal Routine Activity

Ed Martin

Operator: WILLIAMS FIELD SERVICES CO.

Permit(s) Authorizing Facility GW-256

Samples   
Photos / Etc.   
Docs Reviewed

Violation Detail (If applicable) No Violations Identified - All O.K.

Violation Description

Comments / Action Required Minimal oil staining around base of compressors requires remediation. Saddle tank containing glycol needs to be more clearly labeled.

Addition Concerns as Checked: Unauth. Release  Drums  Process Area  Pad / Berm / Liner  BG Tanks/Sumps  Labeling  WD Practice  UG Lines  Housekeeping  Class V  Remediations  Storm Water

OIL CONSERVATION DIV.

02 APR 26 AM 11:00



**Four Corners Area**  
*Environmental Department*  
#188 CR 4900  
Bloomfield, N.M. 87413  
Phone: (505) 634-4956  
Fax: (505) 632-4781

April 23, 2002

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

**Re: Horse Canyon Compressor Station (GW-61) Discharge Plan Modification**

Dear Mr. Ford:

Please be advised that a 500-gallon methanol storage tank has not been described previously in the site's Discharge Plans. The tank is located within a concrete containment with at least 133% of the tank capacity.

The tank location is highlighted on attached facility plot plan. Please make note of this change in the facility's Discharge Plan.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Ethel Holiday".

Ethel Holiday  
Environmental Compliance Specialist

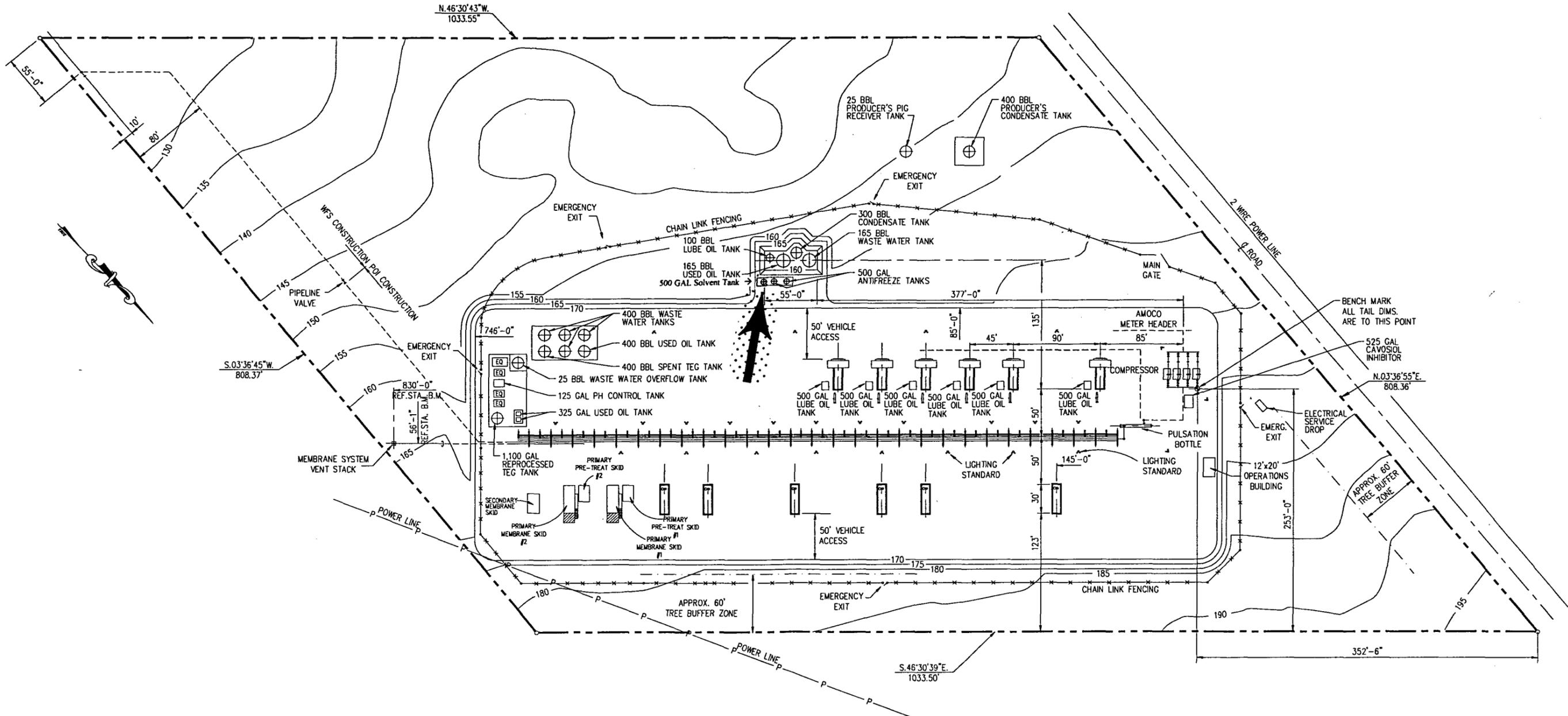
Attachments: Horse Canyon Plot Plan

Xc: Denny Foust, Aztec OCD

**SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN**

**ATTACHMENT 'A' PRODUCT & WASTE STORAGE**

OPERATIONS		
Manual	HORSE CANYON COMPRESSOR STATION	
Section	SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN	Tab 13 Document No. 42.13.001
Effective Date	12-20-99	Issue No. 05 Page No. 5 of 8



REFERENCE DRAWINGS										REVISIONS										<b>DRAFTING BY DATE</b> PHIL 8-21-98 <b>CHECKED BY</b> <b>APPROVED BY</b> <b>ENGINEER BY DATE</b> DESIGNED BY PRJ. APPROVED				STATE: NEW MEXICO COUNTY: SAN JUAN		<b>WILLIAMS FIELD SERVICES</b> ONE OF THE WILLIAMS COMPANIES	
HORSE CANYON COMPRESSOR STATION SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN PLOT PLAN										REVISED PER AS-BUILT REVISED PER UPDATE				SCALE: 1" = 50' V.Q. NO. --		DWG NO. HOC-1-P13		SHEET 1 OF 02									

**NOTICE OF PUBLICATION**

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

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

**(GW-061) - Williams Field Service, Mark J. Baretz, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Horse Canyon compressor station located in the NE/4**

**NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 380 feet with a total dissolved solids concentrations of approximately 3150 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-063) - Williams Field Service, Mark J. Baretz, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Pump Mesa CDP compressor station located in the SW/4 SE/4, Section 14, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 938 feet with a total dissolved solids concentrations of approximately 9800 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-064) - Williams Field Service, Mark J. Baretz, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Middle Mesa compressor station located in the SE/4 SW/4, Section 10, Township 31 North, Range 7 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 940 feet with a total dissolved solids concentrations of approximately 900 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday.

Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 1st day of June, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

Legal #69613  
Pub. June 25, 2001

**AFFIDAVIT OF PUBLICATION**

**Ad No. 44643**

**STATE OF NEW MEXICO  
County of San Juan:**

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

Friday, June 22, 2001.

And the cost of the publication is \$131.44.

Alethia Rothlisberger

ON 6/27/01 ALETHIA ROTH LISBERGER appeared before me, whom I know personally to be the person who signed the above document.

Jimmy Beck  
My Commission Expires April 02, 2004

**COPY OF PUBLICATION**

918

Legals

**NOTICE OF PUBLICATION**

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

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 1st day of June, 2001.

STATE OF NEW MEXICO

## Ford, Jack

---

**From:** Martin, Ed  
**Sent:** Tuesday, June 19, 2001 1:24 PM  
**To:** 'Farmington Daily Times'  
**Cc:** Ford, Jack  
**Subject:** Public Notices

Attn: Legal Notices

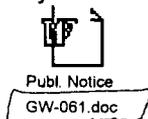
Please publish the attached notices one time immediately upon receipt of this request. Upon publication, please send to this office:

1. Publisher's affidavit
2. Invoice for ad (our purchase order # is 01199000031

Please publish no later than Monday, June 25, 2001.

If you have any questions, call me at (505) 476-3492 or reply to this e-mail.

Thank you.



**Ford, Jack**

---

**From:** Martin, Ed  
**Sent:** Tuesday, June 19, 2001 1:16 PM  
**To:** 'Santa Fe New Mexican'  
**Cc:** Ford, Jack  
**Subject:** Public Notices

Attn: Legal Notices Dept.

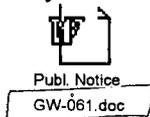
Please publish the attached notices one time immediately upon receipt of this request. Upon publication, please send the following to this office:

1. Publisher's affidavit
2. Invoice for ad (Our purchase order # is 01199000033)

Please publish no later than Monday, June 25, 2001.

If you have any questions, call me at 476-3492 or reply to this message.

Thank you.



## NOTICE OF PUBLICATION

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

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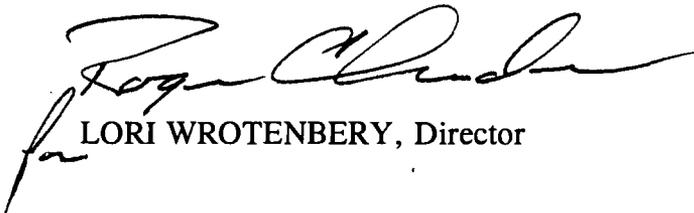
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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 1st day of June, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

SEAL

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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Revised March 17, 1999

Submit Original  
Plus 1 Copy  
to Santa Fe  
1 Copy to Appropriate  
District Office

**DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,  
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS**

(Refer to the OCD Guidelines for assistance in completing the application)

New  Renewal  Modification

*Filing Fee  
Paid*

1. Type: Compressor Station (Horse Canyon Compressor Station)

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, New Mexico 87413

Contact Person: Mark J. Bereta

Phone: (505) 632-4634

3. Location: NE/4 NE/4 Section 27 Township 30North Range 9West

Submit large scale topographic map showing exact location.

*San Juan*

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: Mark J. Bereta

Title: Senior Environmental Specialist

Signature: *Mark J. Bereta*

Date: *May 21, 2001*

**DISCHARGE PLAN RENEWAL**  
**HORSE CANYON COMPRESSOR STATION**  
**(GW- 61)**

Williams Field Services Company

May 2001

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- Appendix A – WES Spill Control Procedures  
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**I. TYPE OF OPERATION**

The Horse Canyon Compressor Station was built in 1991 to provide metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Milagro Plant.

**II. LEGALLY RESPONSIBLE PARTY**

Williams Field Services  
188 CR 4900  
Bloomfield, NM 87413  
(505) 632-4634

**Contact Person:**

Mark J. Baretta, Senior Environmental Specialist  
Phone and Address, Same as Above

**III. LOCATION OF FACILITY**

The Horse Canyon Compressor Station is located in Section 27, Township 30 North, Range 9 West, in San Juan County, New Mexico, approximately 13.3 miles east of Aztec, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangles: Archuleta and Turley, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

**IV. LANDOWNER**

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

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

**V. 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 six 895-hp engines. A waste water evaporation operation is also located on site. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

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

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

**TABLE 1**  
**SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS**  
**HORSE CANYON COMPRESSOR STATION**

<b>PROCESS FLUID/WASTE</b>	<b>SOURCE</b>	<b>QUANTITY (Ranges)</b>	<b>QUALITY</b>
Used Oil	Compressors Waste Water Evaporation Equipment	1100-1500 gal/year/engine 600-1200 bbl/year	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Wash-down Water	Compressor Skid	1000-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Natural Gas Condensate	Scrubber, Gas Inlet Separator	2000-5000 bbl/year	No additives
Glycol	Waste Water Evaporation Equipment	600-1200 bbl/year	No additives
Waste Water / Produced Water	Drawn of Natural Gas Condensate Tank	500-1,000 bbl/year	No additives
Used Process Filters	Air, Inlet and Fuel Gas	100-200/year	No additives
Evaporation Solids	Liquid Containers	10-40 bbls/year	No additives
Empty Drums / Containers	Liquid Containers	20-40/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

**VII. 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, condensate spill cleanups (spill residue), certain absorbents, 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, and engine coolant.

Tables 2a & 2b describe the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site. The tables also include information regarding the type of container in which the waste stream will be stored, container capacity, and containment/spill prevention provisions.

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.

**TABLE 2a**  
**TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS**  
**Horse Canyon Compressor Station**  
**Natural Gas Compression Operations**

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	165 bbl	Berms	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Natural Gas Condensate/ Produced Water	Above Ground Storage Tank	300 bbl	Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Wash-down Water	Above Ground Storage Tank	165 bbl	Berm	Non-exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	Varies	Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Corrosion Inhibitor	Above ground storage tank	525 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above ground storage tanks	(2) 500 gallons (6) 100 & 50 gallons	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above ground storage tanks	100 bbl (6) 500 gallons	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

**TABLE 2b**  
**TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS**  
**Horse Canyon Compressor Station**  
**Waste Water Evaporation Operation**

<b>PROCESS FLUID/WASTE</b>	<b>STORAGE</b>	<b>CONTAINER CAPACITY (approximate)</b>	<b>CONTAINMENT/ SPILL PREVENTION</b>	<b>RCRA STATUS</b>	<b>DESCRIPTION OF FINAL DISPOSITION</b>
Waste Water	Above Ground Storage Tanks	(4) 400 bbl 25 bbl	Berms	Source Specific	Evaporation at this WFS facility.
Used Oil	Above Ground Storage Tank	400 bbl (2) 325 gallons	Berm	Non-exempt	May be hauled to a WFS or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.
Evaporation Solids	Drum or other container	Varies	Berms	Source Specific	Transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	Varies	Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Spent Glycol	Above ground storage tanks	400 bbl	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Reprocessed Glycol	Above ground storage tanks	1,100 gallons	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
PH Control	Above ground storage tanks	125 gallons	Berms	N/A	Off-spec material recycled or disposed consistent with applicable 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.

## **VIII. STORM WATER PLAN**

This storm water section was developed to provide a plan to monitor and mitigate impact to storm water runoff from the facility. It serves to satisfy storm water management concerns of the NMOCD. It is not intended to comply with 40 CFR Part 122, Storm Water Discharges as this facility is excluded in 122.26 (c) (1) (iii).

This section concentrates on the identification of potential pollutants, inspection and maintenance of the pollutant controls, and gives a description of structural controls to prevent storm water pollution.

### **Site Assessment and Facility Controls**

An evaluation of the material used and stored on this site that may be exposed to storm water indicates that no materials would routinely be exposed to precipitation. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms, curbs, or emergency response actions, could flow overland to open off-site drainage ditches (arroyos) and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.

### **Best Management Practices**

Following are Best Management Practices (BMPs) to be implemented to prevent or mitigate pollution to storm water from facility operations:

- All waste materials and debris will be properly disposed of on an on-going basis in appropriate containers and locations for collection and removal from the site.
- Temporary storage of potential pollutant sources will be located in areas with appropriate controls for storm water protection. This would include ensuring all containers are sealed/covered and otherwise protected from contact with precipitation.
- Periodic inspection of channels and culverts shall be performed at least twice annually and after any major precipitation event.
- Sediment deposits and debris will be removed from the channels and culverts as necessary and any erosion damage at the outfall (if any) will be repaired or controlled.
- Conduct inspections of the facility on a regular basis as part of the preventive maintenance site check. Such inspections will include the visual assessment of corroded or damaged drums and tanks, broken or breached containment structures, collapsed or clogged drainages or drain lines.

Implementation of the BMPs will prevent or mitigate impact to storm water runoff from this facility.

**IX. INSPECTION, MAINTENANCE AND REPORTING**

WFS personnel will operate and maintain the compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through Gas Dispatch. The facility will be visited several times per week at a minimum, and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

In the event of a release of a reportable quantity, the operator reports the release to a WFS spill notification service. The service immediately notifies the WFS Environmental Department and all appropriate agencies.

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

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

WFS corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).

**XI. SITE CHARACTERISTICS**

The Horse Canyon Compressor Station is located approximately 13.3 miles east of Aztec, New Mexico. The site elevation is approximately 5,970 feet above mean sea level. The natural ground surface topography slopes downward toward the south. The maximum relief over the site is approximately 20 feet. Intermittent flow from the site will follow natural drainage to the south towards an unnamed drainage. The nearest down-gradient perennial source of surface water is the San Juan River located approximately 1.9 miles south of the site, at an elevation of approximately 5,600 feet.

A review of the available hydrologic data<sup>1,2,3</sup> for this area revealed that there are no water wells within a 1/4-mile radius of Horse Canyon 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 200 to 400 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

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

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

### References

<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>Records of Water Wells in San Juan County, 1978-1983.

<sup>3</sup>Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2001.

## **XII. FACILITY CLOSURE PLAN**

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

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

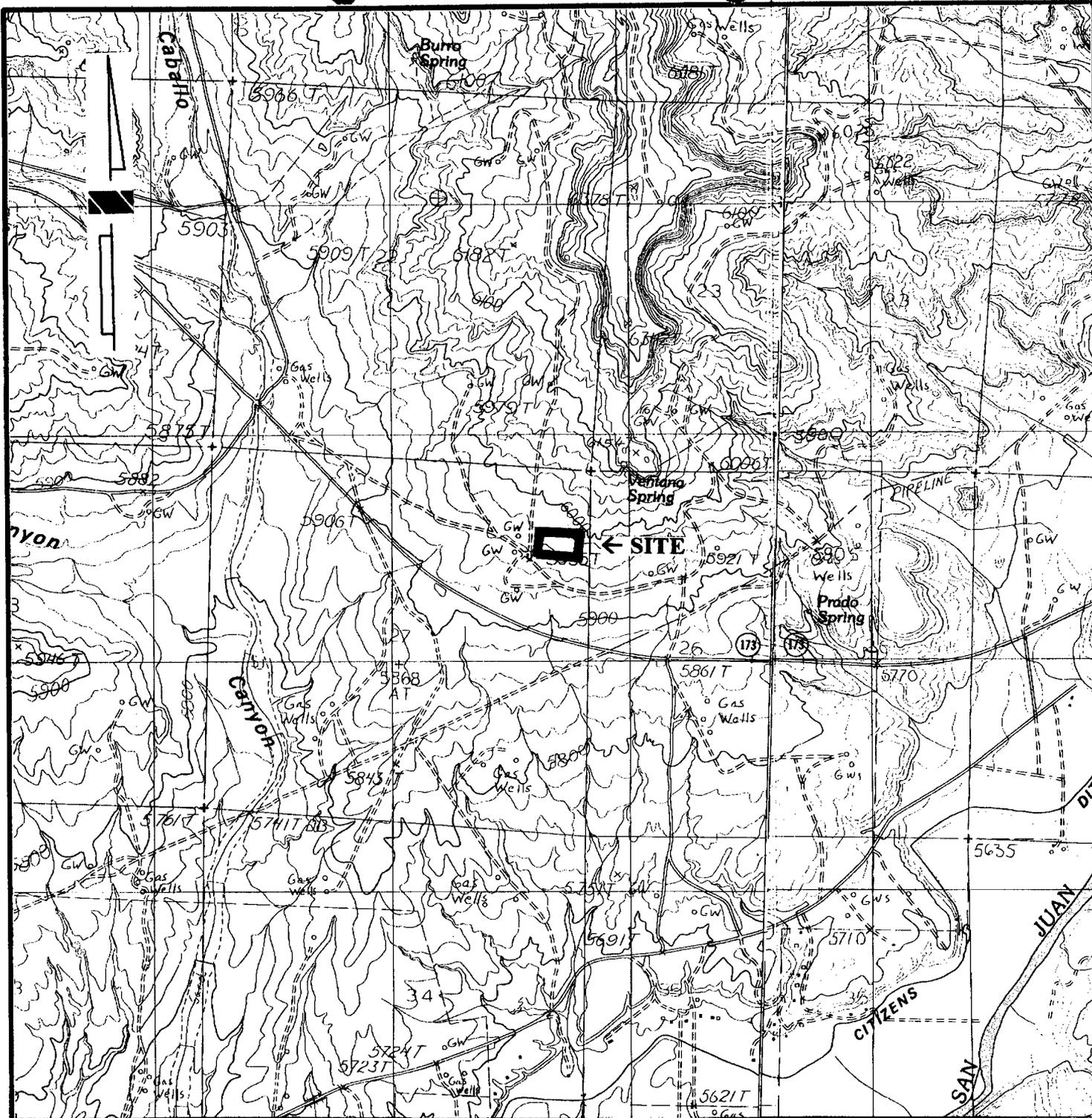
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

**FIGURE 1**

**SITE VICINITY / TOPOGRAPHIC MAP**

**FIGURE 2**

**SITE PLAN**



Source: USGS Turley and Archuleta Quadrangles, New Mexico

Scale: 1" = 2,000'

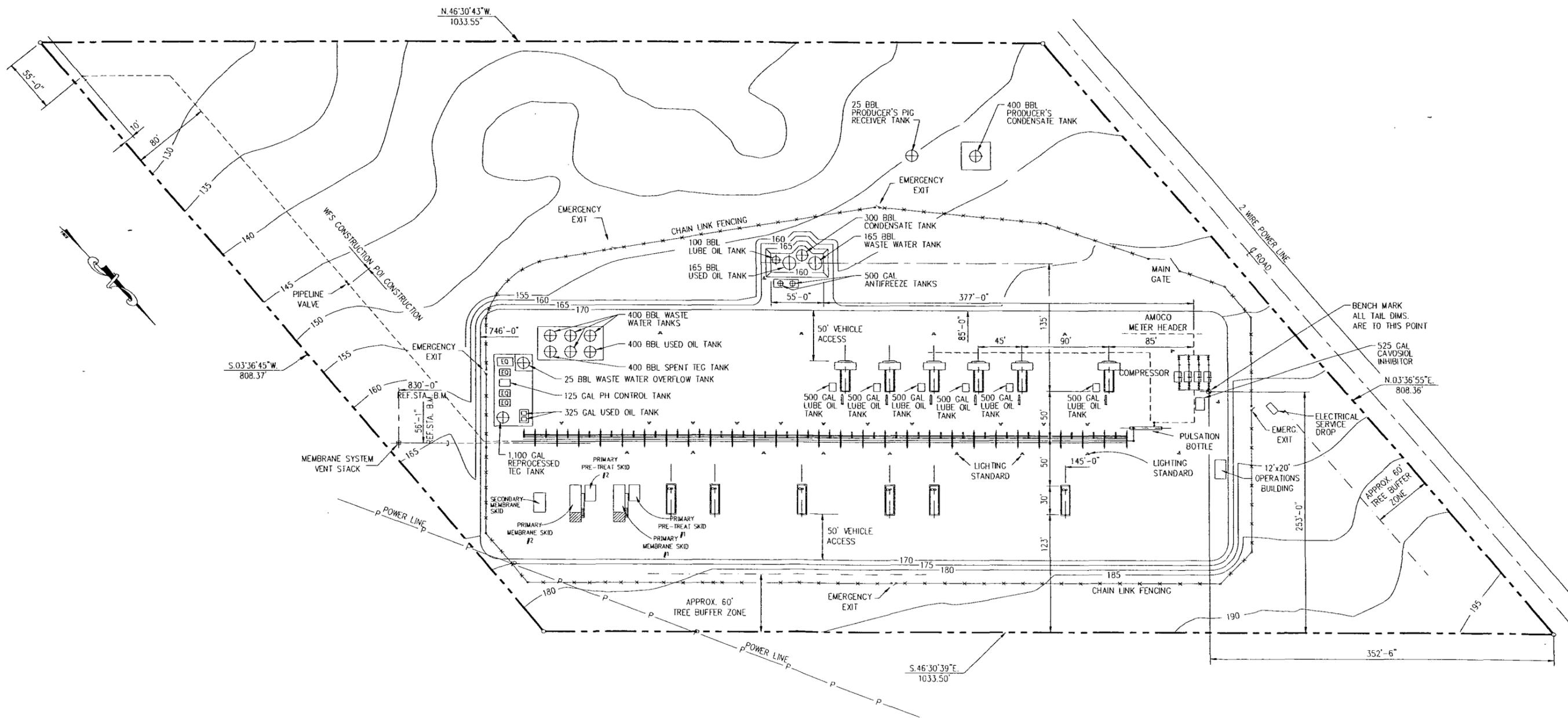


**Figure 1 Site Vicinity / Topographic Map**  
**Horse Canyon Compressor Station**  
 Section 27, Township 30N Range 9W  
 San Juan County, New Mexico

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

ATTACHMENT "A" PRODUCT & WASTE STORAGE

OPERATIONS		
Manual	HORSE CANYON COMPRESSOR STATION	
Section	Tab	Document No.
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN	13	4213.001
Effective Date	Issue No.	Page No.
12-20-99	05	5 of 8



REFERENCE DRAWINGS										REFERENCE DRAWINGS										REVISIONS										DRAFTING BY DATE PHIL 8-21-98 CHECKED BY APPROVED BY ENGINEER BY DATE DESIGNED BY PROJ. APPROVED				STATE: NEW MEXICO COUNTY: SAN JUAN		WILLIAMS FIELD SERVICES ONE OF THE WILLIAMS COMPANIES	
02 12/28/99 BES 01 8-21-98 PHIL REVISED PER AS-BUILT REVISED PER UPDATE										DWG NO. HOC-1-P13				SHEET 1 OF 1		REV 02																					

**APPENDIX A**  
**SPILL CONTROL PROCEDURES**

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

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*Hit "CTRL-F" to find text on this page.*

## ▶ Document History (ISO9001)

## ▼ Document Body

### 1.0 PURPOSE AND SCOPE

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

### 2.0 CONTENTS

### 3.0 POLICY

#### 3.1 GENERAL

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

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

- a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act
- c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
- d. Section 112 of the Clean Air Act
- e. Section 7 of the Toxic Substance Control Act

- 3.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- 3.1.5 Facilities which could discharge or spill, oil or hazardous substances into a watercourse must comply with the applicable federal, state or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake or standing body of water capable of collecting or transporting an oil or hazardous substance.
- 3.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
  - a. Non-Transportation Related Facilities
    - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
    - (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
  - b. Transportation Related Facilities
    - (1) All vehicles, pipeline facilities, loading/unloading facilities and other mobile facilities which transport oil or hazardous substances.
- 3.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all oil and hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.
- 3.1.8 The facility superintendent is responsible for spill prevention. His/her duties include,

but are not limited to, the following:

- a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
  - b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
  - c. Briefings should highlight and describe known discharges or spills and recently developed precautionary measures.
- 3.1.9 Each individual facility is checked annually by the superintendent or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.
  - b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
  - c. An annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.
- 3.1.10 Any field drainage ditches, road ditches, traps, sumps or skimmers should be inspected at regular scheduled intervals for accumulation of oil or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

## **3.2 BULK STORAGE TANKS**

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

### **3.3 FACILITY DRAINAGE**

- 3.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from diked areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.
- 3.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.
- 3.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.
- 3.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:
- a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation or displacement by foreign materials.
  - b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.
  - c. Any dike three feet or higher should have a minimum cross section of two feet at the top.
- Other means of containment or spill control include, but are not limited to:
- 3.3.5
- a. Berms or retaining walls
  - b. Curbing
  - c. Culverting, gutters or other drainage systems
  - d. Weirs, booms or other barriers
  - e. Spill diversion ponds or retention ponds
  - f. Sorbent materials

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

- 3.4.1 Aboveground valves and pipelines should be examined regularly by operating

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

### **3.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK**

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

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

## **4.0 PROCEDURE**

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

- 4.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity shall immediately contain the release (if safe to do so) and notify the facility superintendent, dispatcher or other designee. Releases must be reported to gas control in the following three circumstances:

I. The Following Situations Always Require IMMEDIATE Reporting to Gas Control:

1. Release reaches or may reach surface water: (pond, lake, wash or ground water)
2. Release leaves Williams property
3. Release is of questionable nature (i.e., unknown product, unknown hazards)

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

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

- Ammonia
- Antifreeze
- Amine

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

### III. Releases of Certain Other Materials Reportable:

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

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

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

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

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

- a. Name of company facility and/or location of facility and nature of discharge or spill
- b. Description and quantity of emission or substance discharged
- c. Description of the circumstances causing the discharge or spill
- d. Name, title and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
- e. Action taken or being taken to mitigate and correct discharge or spill
- f. Water bodies or streams involved
- g. Time and duration of discharge or spill

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

**Gas Control Personnel**

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

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

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

**Facility Superintendent**

- 4.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.

- 4.1.6 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed. If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).

- 4.1.7 Advises Environmental Affairs by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

**Environmental Affairs**

- 4.1.8 Assesses reporting requirements to state and federal agencies (contacts Legal Department and Right-of-Way Department, if appropriate). (See Emergency Operating Procedure Manuals).

- 4.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.

- 4.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

**4.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL**

**Facility Superintendent or Designee**

- 4.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:

a. Time and date of discharge or spill

b. Facility name and location

c. Type of material spilled

d. Quantity of material spilled

e. Area affected

f. Cause of spill

g. Special circumstances

h. Corrective measures taken

i. Description of repairs made

j. Preventative measures taken to prevent recurrence.

4.2.2 Forwards the completed written description to Environmental Affairs. Retains a copy for future reference.

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

**ATTACHMENT A  
DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS**

TYPE OF FACILITY WHERE THE DISCHARGE OR SPILL OCCURS	CONTAINMENT PROCEDURES	MATERIALS USED FOR CONTAINMENT
A. Oil Pipeline (as defined in C.1.4)	1. Closes appropriate block valves.  2. Contains Discharge or spill by: Ditching covering, applying sorbents, constructing an earthen dam or burning.  3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	1. Straw  2. Loose Earth  3. Oil Sorbent 3M Brand  4. Plain Wood chips  5. Sorb-Oil Chips Banta Co.  6. Sorb-Oil Swabs Banta Co.  7. Sorb-Oil Mats Banta Co.  8. Or Equivalent Materials
B. Vehicle	1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, apply sorbents or burning.  2. Notifies immediately Environmental Affairs and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials.	

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

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**APPENDIX B**

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

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

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999  
Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release 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

**NATURE OF RELEASE**

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*		
Describe Area Affected and Cleanup Action Taken.*		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.		
Signature:	<b>OIL CONSERVATION DIVISION</b>	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
Date:	Phone:	Conditions of Approval:
		Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

February 9, 2001

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 0074**

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

**RE: Discharge Plan Renewal Notice for Williams Field Services Facilities**

Dear Ms. Garcia:

Williams Field Services has the following discharge plans, which expire during the current calendar year.

**GW-060 expires 3/21/2001 – Milagro Compressor Station**  
**GW-233 expires 4/1/2001 – La Jara Compressor Station**  
**GW-061 expires 6/6/2001 – Horse Canyon Compressor Station**  
**GW-062 expires 6/6/2001 – Manzanares Compressor Station**  
**GW-063 expires 6/6/2001 – Pump Mesa Compressor Station**  
**GW-064 expires 6/6/2001 – Middle Mesa Compressor Station**  
**GW-079 expires 6/21/2001 – Wild Horse Compressor Station**  
**GW-078 expires 6/21/2001 - 5-Points Compressor Station**  
**GW-250 expires 8/9/2001 – Coyote Springs Compressor Station**  
**GW-249 expires 8/9/2001 – Trunk B Booster Compressor Station**  
**GW-248 expires 8/9/2001 – Trunk A Booster Compressor Station**  
**GW-257 expires 9/18/2001 – Trunk C Compressor Station**  
**GW-256 expires 9/18/2001 – Koch-Gardner Compressor Station**  
**GW-087 expires 11/27/2001 – Cedar Hill Compressor Station**  
**GW-271 expires 12/17/2001 – Kernaghan Compressor Station**  
**GW-274 expires 12/17/2001 – Pritchard Straddle Compressor Station**  
**GW-273 expires 12/17/2001 – Moore Compressor Station**  
**GW-272 expires 12/17/2001 – Kernaghan B-8 Compressor Station**

**WQCC 3106.F.** If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued

under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 20NMAC 6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00. After January 15, 2001 renewal discharge plans require a flat fee equal to the flat fee schedule for gas processing facilities pursuant to revised WQCC Regulations 20NMAC 6.2.3114. A copy of the revised fee schedule is included for your assistance. The \$100.00 filing fee is to be submitted with each discharge plan renewal application and is nonrefundable.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A complete copy of the regulations is also available on NMED's website at [www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)).

If any of the above-sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services has any questions, please do not hesitate to contact Mr. Jack Ford at (505) 476-3489.

Sincerely,



Roger C. Anderson  
Oil Conservation Division

cc: OCD Aztec District Office

*Work copy*

SITE NAME	DISCHARGE PLAN #	CURRENT OCD PLAN # of Units/ HP	ACTUAL INSTALLS # of Units/ HP	AQB PERMITTED # of Units/ HP	
<b>Category 1 - Update OCD Plans for actual compression; AQB permit allows additional installations</b>					
OK 31-6 #1	X	GW-118	6 units/990 HP ea <i>5+4</i>	15 units/1370 HP ea	16 units/1370 HP ea
No Mod. request → OK 32-7 #1	✓	GW-117	4 units/895 HP ea <i>ok</i>	6 units/1357 HP ea	8 units/1357 HP ea
No Mod. request → OK 32-8 #2	X	GW-111	4 units/895 HP ea <i>4+2</i>	5 units/1357 HP ea	9 units/1357 HP ea
OK HORSE CYN. CDP	OK	GW-61	4 units/895 HP ea <i>11/7</i>	6 units/1390 HP ea	14 units/1390 HP ea
OK MIDDLE MESA CDP	X	GW-64	10 units/895 HP ea <i>10+4</i>	19 units/1362 HP ea	20 units/1362 HP ea
OK PUMP MESA CDP	OK	GW-63	6 units/895 HP ea <i>6+6</i>	10 units/1363 HP ea	14 units/1363 HP ea
OK TRUNK N C.S.	OK	GW-306	5 units/1140 HP ea	6 units/1140 HP ea	8 units/1368 HP ea
No Mod. request → OK TRUNK L C.S.	X	GW-180	6 units/990 HP ea	10 units/990 HP ea	14 units/1131 HP ea
<b>Category 2 - OCD Plan currently reflects all AQB permitted units; however, all units not yet installed</b>					
29-6 #4 CDP		GW-122	10 units; total site HP 10,980 <i>4+3</i>	6 units/1377 HP ea.; 1 unit/1148 HP	9 units/1377 HP ea.; 1 unit/1148 HP
32-9 CDP		GW-91	8 units/1379 HP ea	5 units/1379 HP ea	8 units/1379 HP ea
OK CEDAR HILL CDP		GW-87	10 units/1386 HP ea <i>OK 5+1</i>	7 units/1386 HP ea	10 units/1386 HP ea
KERNAGHAN B-8 STRADDLE		GW-272	2 units/764 HP ea	1 unit/764 HP	2 units/764 HP ea
MANZANARES CDP		GW-62	4 units/895 HP ea	3 units/895 HP ea	4 units/1300 HP ea
MOORE STRADDLE		GW-273	2 units/ 778 HP ea	1 unit/ 778 hp	2 units/ 778 hp ea
NAVAJO CDP		GW-182	4 units/2946 HP ea	3 units/2916 HP ea	4 units/2916 HP ea
TRUNK A BOOSTER C.S.		GW-248	6 units/1367 HP ea	3 units/1367 HP ea	6 units/1369 HP ea
TRUNK B BOOSTER C.S.		GW-249	7 units/1367 HP ea	3 units/1367 HP ea	7 units/1367 HP ea
MARTINEZ DRAW		GW-308	2 units/1380 HP ea	1 unit/1380 HP	2 units/1232 HP ea
QUINTANA MESA		GW-309	2 units/1380 HP & 1151 HP	1 unit/1232 HP	2 units/1232 HP & 1118 HP
<b>Category 3 - Update OCD Plans for actual compression; all AQB permitted units installed</b>					
29-6 #2 CDP	X	GW-121	5 units/895 HP ea. <i>5+2</i>	12 units/1370 HP ea.	12 units/1370 HP ea.
ROSA #1 CDP	X	GW-292	1 unit/1372 HP	2 unit/1372 HP	2 units/1371 HP ea
TRUNK M C.S.	X	GW-181	1 unit/990 HP	2 units/1378 HP ea	2 units/1378 HP ea
PIPKIN		GW-120	2 units/856 HP total	1 unit/1403 HP	1 unit/1403 HP
LA JARA FIELD	X	GW-233	1 Solar T-3000/ 2831 hp; 2 Solar T-4000/ 2897 hp ea.	2 Solar T-4000, 2 Solar T-4700S, 1 Solar T-4700=total 17,700 hp	2 Solar T-4000, 2 Solar T-4700S, 1 Solar T-4700=total 17,700 hp

No Mod. request → OK  
 No Mod. request → OK  
 No Mod. request → OK

Notice of add. 9 units 7-91. Not in app.  
 Notice on removal  
 (mod. to 14 units '92)  
 (14 units in removal app. '92)  
 (6 units in app. '95)  
 (up to 8 units in removal app. '98)

OK

-change hp total



295 Chipeta Way  
P.O. Box 58900  
Salt Lake City, UT 84108  
801/584-6543  
801/584-7760

May 11, 1999

Mr. Jack Ford  
NM OCD  
2040 South Pacheco  
Santa Fe, New Mexico 87505

Re: Modification of Williams Field Services Discharge Plan for Horse Canyon (GW – 061)

Dear Mr. Ford:

Pursuant to our conversation today and my March 1999 submittal to you, Williams Field Services (WFS) formally requests modification to the Discharge Plan for the Horse Canyon compressor site to allow the installation of up to fourteen 1390 horsepower units. There are currently six units operating at the site. This modification includes the installation of additional units and an increase in horsepower from 895 to 1390. No additional waste streams will be generated with this modification. This modification corresponds to permitting levels allowed by the Air Permit currently held for this site.

If you have any questions or require additional information, I can be reached at 801-584-6543.

Sincerely,

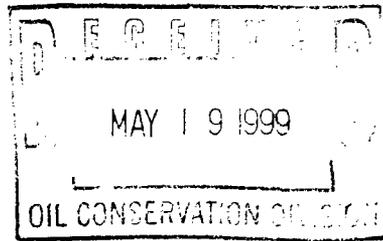
A handwritten signature in black ink, appearing to read "Ingrid Deklau".

Ingrid Deklau  
Environmental Specialist

XC: Denny Foust, Aztec OCD



295 Chipeta Way  
P.O. Box 58900  
Salt Lake City, UT 84108  
801/584-6543  
801/584-7760



May 14, 1999

Mr. Jack Ford  
NM OCD  
2040 South Pacheco  
Santa Fe, New Mexico 87505

Re: WFS Requests for Modification of Various OCD Discharge Plans

Dear Mr. Ford:

Enclosed you will find formal requests for modification of OCD Discharge Plans for sites listed in the following categories on my March 1999 submittal to you:

- Category 1 Update OCD Plans for actual compression; AQB permit allows additional installs
- Category 3 Update OCD Plans for actual compression; all AQB permitted units installed
- Category 5 Current OCD Plan reflects actual installs; AQB permit allows additional installs.

The table below lists the sites for which modifications have been requested.

Category 1	Category 3	Category 5
31-6	Rosa #1	30-5
32-7	Trunk M	30-8
32-8#2	La Jara	Decker Junction
↙ Horse Canyon	Note 1: 29-6#2 belongs in Cat. 6	Sims Mesa
Middle Mesa	Note 2: Pipkin OCD plan reflects more units than actual installs	Lateral N-30
Pump Mesa		
Trunk N		
Trunk L		

For sites that fall under Categories 1 and 3, the OCD Discharge Plans need to be modified to reflect the actual number of units currently installed at the site, and also allow room for additional installations for which WFS currently holds Air Permits.

For sites that fall under Category 5, the OCD Discharge Plan properly reflects the current number of units installed, but the Plan should be modified to allow for the additional units allowed under WFS Air Permits for the site.

If you have any questions or require additional information, I can be reached at 801-584-6543.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ingrid Deklau', written over the word 'Sincerely,'.

Ingrid Deklau  
Environmental Specialist

Xc: Denny Foust, Aztec OCD



295 Chipeta Way  
P.O. Box 58900  
Salt Lake City, UT 84108  
801/584-6543  
801/584-7760

September 14, 1998

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

**Re: Underground Line Testing Results at various Williams Field Services Facilities**

Dear Mr. Ford:

Enclosed, please find a copy of the results of the underground line testing that was performed at the Williams Field Services (WFS) facilities listed below.

Trunk C (GW-259)  
Hart Mountain (GW-208)  
Decker Junction (GW-134)  
Aztec (GW-155)  
Cedar Hill (GW-87)  
Horse Canyon (GW-61)  
32-7 (GW-117)

Carracas (GW-112)  
32-8#3 (GW-116)  
Rosa #1 (GW-292)  
Manzanares (GW-62)  
Simms Mesa (GW-68)  
Trunk A (GW-248)  
29-7 (GW-136)

30-5 (GW-108)  
30-8 (GW-133)  
Trunk B (GW-249)  
32-9 (GW-91)  
Kernaghan (GW-271)  
Trunk N (GW-306)  
32-8#2 (GW-111)

Also  
Added: Moore (GW-273)

Pritchard (GW-274)

Kernaghan B-8 (GW-272)

If you have any questions concerning this submittal, please call me at 801-584-6543.

Sincerely,



Ingrid Deklau  
Environmental Specialist

XC: Denny Foust, NM OCD



**AFFIDAVIT OF PUBLICATION**

No. 39766

**COPY OF PUBLICATION**

STATE OF NEW MEXICO  
County of San Juan:

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

Monday, June 29, 1998

and the cost of publication is: \$69.92

*Denise H. Henson-Woodall*

On 6-30-98 DENISE H. HENSON WOODALL appeared before me, whom I know personally to be the person who signed the above document.

*Roger C. Anderson*  
My Commission Expires November 1, 2000

**Legals**



**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, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

**(GW-061) - Williams Field Services, Ingrid A. Deklau, (801) 584-6543, P.O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge application for modification of its previously approved discharge plan for the Horse Canyon Compressor Station located in the NW/4 SW/4 of Section 35, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. The addition of a tank battery containing up to six (6) 400 barrel closed tanks will be installed for storage of waste water collected and transported to this facility for treatment and disposal using an enhanced closed evaporation system. Remaining solids will be collected for transport offsite to an OCD approved disposal facility. Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of approximately 380 feet with a total dissolved solids concentration of approximately 3,150 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application(s) may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan application(s), the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. 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 there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

**GIVEN** under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 19th day of June, 1998.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

/s/Roger C. Anderson  
for LORI WROTENBERY, Director

**SEAL**

Legal No. 39766, published in The Daily Times, Farmington, New Mexico, on Monday, June 29, 1998.

# The Santa Fe New Mexican

Since 1849 We Read You.

NM OCD  
ATTN: SALLY MARTINEZ  
2040 S. PACHECO  
SANTA FE, NM 87505

ADVERTISING DIVISION

AD NUMBER: 32258      ACCOUNT: 56689  
LEGAL NO: 63745      P.O.#: 98199000257  
182 LINES      1 time(s) at \$ 72.80  
AFFIDAVITS:      5.25  
TAX:      4.88  
TOTAL:      82.93

### NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 19th day of June 1998.

STATE OF NEW MEXICO  
OIL CONSERVATION  
DIVISION  
LORI WROTENBERY,  
Director

Legal #63745  
Pub. June 26, 1998

### AFFIDAVIT OF PUBLICATION

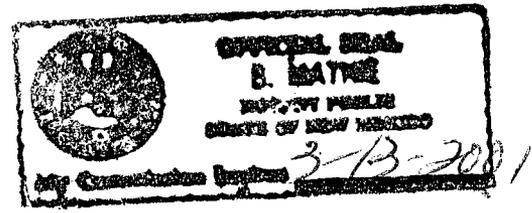
STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, B. Reiner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTE FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #63745 a copy of which is hereto attached was published in said newspaper 1 day(s) between 06/26/1998 and 06/26/1998 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 26 day of June, 1998 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ Betsy Reiner  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
26 day of June A.D., 1998

Notary B. Matthe  
Commission Expires 3-13-2001



NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 19th day of June 1998.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

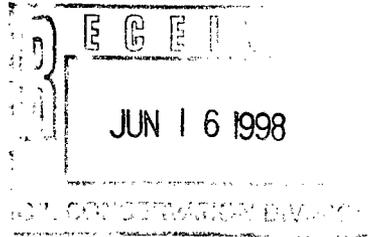


*Lori Wrottenbery*  
LORI WROTENBERY, Director

S E A L



295 Chipeta Way  
P.O. Box 58900  
Salt Lake City, UT 84108  
801/584-6543  
801/584-7760



June 8, 1998

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

**Re: Update to Williams Field Services Horse Canyon Discharge Plan GW-61**

Dear Mr. Ford:

This letter serves as notification of update to the GW-61 Williams Field Services (WFS) Horse Canyon Compressor Station Discharge Plan.

Evaporator Installation

WFS plans to install a wastewater evaporator at the Horse Canyon Compressor Station. The wastewater stream will consist of wash water and rainwater from compressor and dehydrator skids. Deminimus quantities of lube oil, antifreeze, and/or triethylene glycol (TEG) may enter the wastewater stream via leaks and condensation.

Wastewater will be collected from several compressor stations within the Manzanares System, and transported to this location for consolidation and evaporation. The water will be received into a tank battery containing up to six 400-bbl tanks. The water will then flow into a natural gas fired evaporation unit. As the water evaporates, TEG and lube oil will be concentrated and drawn off to a heater treater. The temperature and retention time of the liquid in the heater treater will promote separation of the lube oil from the TEG. The lube oil will be drawn off into a waste oil tank for recycling. The TEG solution will be filtered and discharged first into a regeneration unit (reboiler) to remove any remaining water, and then to a distillation unit to remove any other contaminants. The re-refined TEG product will then be used in WFS dehydrators.

The tanks and equipment involved in this process will be surrounded by an earthen berm.

The solids that remain after evaporation will be periodically removed and disposed at an OCD or other approved facility. The volume of waste generated is expected to be approximately 1 drum of solid waste per 10,000 bbl of treated water.

A pilot study of this system was tested at one of our facilities. A sample of the wastewater to be evaporated and resulting sludge were analyzed for TCLP volatiles, metals, and semi-volatiles. All results

were non-detect, except for those listed in the table below. All results were below regulatory limits. WFS plans to sample the sludge and wastewater periodically to ensure accurate characterization of the waste streams.

Parameter	Wastewater (mg/l)	Sludge (mg/l)	Regulatory Level (mg/l)
Benzene	0.18	ND	0.5
2-Butanone (MEK)	ND	0.4	200
Arsenic	ND	0.006	5
Barium	0.41	0.07	100
Chromium	ND	0.1	5
Lead	0.393	ND	5
Selenium	0.014	0.005	1
m,p-Creosol	ND	0.44	200
o-Creosol	ND	0.285	200

ND=non-detect

#### Tank Update

The following storage tanks are present on the site. Many of these tanks are listed in the current Discharge Plan. For your convenience, all WFS storage tanks at the location are included in the list below.

- (1) 300 bbl Condensate Tank, in earthen berm
- (1) 100-bbl Lube Oil Tank, in earthen berm
- (1) 500-gal Solvent Tank, berm to be constructed
- (2) 500-gal Antifreeze Tanks, in concrete containment
- (1) 500-gal Lube Oil day tank adjacent to each compressor, berm to be constructed
- (1) 165-bbl Waste Oil Tank, in earthen berm
- (1) 165-bbl Wastewater Tank, in earthen berm

#### Number of Compressors

There are currently 8 compressors at the site, though this number may change in the future.

If you have any questions, I can be reached at 801-584-6543. Your assistance in handling these matters is appreciated.

Best regards,



Ingrid A. Deklau  
Environmental Specialist

Xc: Denny Foust, Aztec OCD



February 21, 1996

Roger C. Anderson  
Environmental Bureau Chief  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

Re: Groundwater Discharge Plan Renewals

Dear Mr. Anderson

On behalf of Williams Field Services and Williams Gas Processing - Blanco I am submitting renewal applications for the following Groundwater Discharge Plans.

GW-61 Horse Canyon Compressor Station, San Juan County  
GW-62 Manzanares Compressor Station, San Juan County  
GW-63 Pump Mesa Compressor Station, San Juan County  
GW-64 Middle Mesa Compressor Station, San Juan County  
GW-78 Five Points Compressor Station, Rio Arriba County  
GW-79 Wild Horse Compressor Station, Rio Arriba County

4665 INDIAN SCHOOL NE

SUITE 106

I am enclosing a check for \$ 300.00 to cover the filing fee for the 6 applications. If you have any questions or need clarification, please call me or Leigh Gooding of Williams Field Services at 801-584-6543.

ALBUQUERQUE

Sincerely,

A handwritten signature in cursive script that reads 'Susan E. Boyle'.

Susan E. Boyle  
Project Manager

NEW MEXICO

87110

cc: w/attachments  
Denny Foust  
OCD Aztec Office

PHO 505 266 6611

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 2/21/96

or cash received on \_\_\_\_\_ in the amount of \$ ~~212.96~~  
\$ 300.00

from Environmental Services  
for WFS Horse Canyon (GW61); Manzanitas (GW62); Pump Mesa (GW63); Middle Mesa (GW64); Five Points (GW78); Wild Horse (GW79)

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
(Facility Name) (DP No.)

Submitted to ASD by: R. Chudler Date: 3/25/96

Received in ASD by: Angela Herrera Date: 3-29-96

Filing Fee  New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_



Norwest Bank New Mexico, N.A.  
Albuquerque, New Mexico 87103-1081

Cashier's  
Check

0204/c.gilbert

Remitter \*\*Environmental Services, Inc.\*\*

Date February 21, 1996

95-219/1070

Pay NORWEST BANK NEW MEXICO, N.A. 300 dollars 00 cents \$ \*\*300.00\*\*

To the Order of \*\*Oil Conservation Division\*\*

Christy Gilbert  
Authorized Representative



RECEIVED

FEB 28 1996

2260

USFWS - NMESSO

OIL CONSERVATION DIVISION  
RECEIVED

'96 MAR 14 AM 8 52

**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, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

**(GW-61) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah 84158-0900, has submitted a Discharge Plan Renewal Application for the Horse Canyon CDP located in the NE/4 NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 380 feet with a total dissolved solids concentration of approximately 3,150 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

**(GW-62) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah 84158-0900, has submitted a Discharge Plan Renewal Application for the Manzanares CDP located in the SE/4 SW/4, Section 28, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 27 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 115 feet with a total dissolved solids concentration of approximately 910 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

**(GW-63) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah 84158-0900, has submitted a Discharge Plan Renewal Application for the Pump Mesa CDP located in the SW/4 SE/4, Section 14, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 938 feet with a total dissolved solids concentration of approximately 9800 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.**

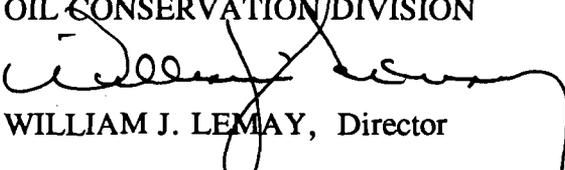
(GW-64) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah 84158-0900, has submitted a Discharge Plan Renewal Application for the Middle Mesa CDP located in the SE/4 SW/4, Section 10, Township 31 North, Range 7 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 940 feet with a total dissolved solids concentration of approximately 900 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 26th day of February, 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
WILLIAM J. LEMAY, Director

WJL/pws

S E A L

**NO EFFECT FINDING**

The described action will have no effect on listed species, wetlands, or other important wildlife resources.

Date March 13, 1996

Consultation # GWOC96-1

Approved by 

U.S. FISH and WILDLIFE SERVICE  
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE  
ALBUQUERQUE, NEW MEXICO

**RECEIVED**

MAR 15 1996

Environmental Bureau  
Oil Conservation Division

# The Santa Fe New Mexican

Since 1849. We Read You.

NEW MEXICO OIL CONSERVATION

AD NUMBER: 473905

ACCOUNT: 56689

LEGAL NO: 59186

P.O. #: 96199002997

308 LINES once at \$ 123.20

Affidavits: 5.25

Tax: 8.03

Total: \$ 136.48

## AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 59186 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 1st day of MARCH 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
1st day of MARCH A.D., 1996



OFFICIAL SEAL

Candace C. Ruiz

NOTARY PUBLIC - STATE OF NEW MEXICO

My Commission Expires: 7/27/99

RECEIVED  
MAR 7 1996  
CONSERVATION DIVISION

**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, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

(GW-61) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah 84158-0900, has submitted a Discharge Plan Renewal Application for the Horse Canyon CDP located in the NE/4 NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 380 feet with a total dissolved solids concentration of approximately 3,150 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-62) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah 84158-0900, has submitted a Discharge Plan Renewal Application for the Manzanares CDP located in the SE/4 SW/4, Section 28, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 27 gallons per day of waste water is stored

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 26th day of February, 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
WILLIAM J. LEMAY, Director  
#59186  
Pub. March 1, 1996

# AFFIDAVIT OF PUBLICATION

No. 35978

**STATE OF NEW MEXICO**  
**County of San Juan:**

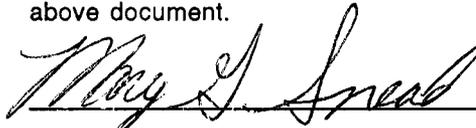
**ROBERT LOVETT** being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES,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

Monday, March 4, 1996

and the cost of publication is: \$110.60

  
\_\_\_\_\_

On ~~3/5/96~~ <sup>3/4/96</sup> ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.

  
\_\_\_\_\_

My Commission Expires March 21, 1998

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

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If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. ~~If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the discharge plan application and information submitted at the hearing.~~

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 26th day of February, 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

/s/William J. LeMay  
WILLIAM J. LEMAY, Director

SEAL

WJL/pws



March 6 52

March 4, 1996

**RECEIVED**

**MAR 4 1996**

Environmental Bureau  
Environmental Bureau  
Oil Conservation Division

Mr. Pat Sanchez  
Petroleum Engineer Specialist  
NM Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Subject: Horse Canyon Discharge Permit Application

Dear Mr. Sanchez:

Enclosed are three corrected pages for replacement in your two copies of the Horse Canyon Groundwater Discharge Permit Application. The location of the compressor station has been changed on each page to reflect NE/4 NE/4 Section 27, T 30 N, R 9 W.

Thank you.

Sincerely,

*Ann W. Whitehead*

Ann W. Whitehead  
Environmental Technician

Encl.

4665 INDIAN SCHOOL NE

SUITE 106

ALBUQUERQUE

NEW MEXICO

87110

PHO 505 266 6611

Environmental Bureau  
 Oil Conservation Division  
 2040 S. Pacheco  
 Santa Fe, NM 87505

**DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS,  
 OIL REFINERIES AND GAS COMPRESSOR STATIONS**

*(Refer to OCD Guidelines for assistance in completing the application.)*

- I. TYPE: Natural Gas Compressor Station - Horse Canyon Compressor Station
- II. OPERATOR: Williams Field Services  
 ADDRESS: 295 Chipeta Way, Salt Lake City, Utah 84158-0900  
 CONTACT PERSON: Leigh Gooding PHONE: 801-584-6543
- III. LOCATION: NE /4 NE /4 Section 27 Township 30 North Range 9 West  
 Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner(s) of the facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of sources, quantities and quality of effluent and waste solids.
- VII. Attach a description of current liquid and solid waste transfer and storage procedures.
- VIII. Attach a description of current liquid and solid waste disposal procedures.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
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- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

XIII. CERTIFICATION

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

Name: Terry G. Spradlin

Manager,  
 Title: Environmental Health and Safety

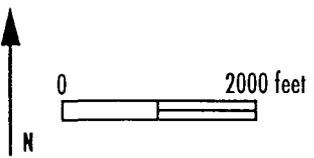
Signature: 

Date: 2-29-96

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.



**Horse Canyon Compressor Station**  
 Williams Field Services  
 T 30 N, R 9 W, NE 1/4 NE 1/4 Section 27  
 San Juan County, New Mexico



## Location of Horse Canyon Compressor Station

**Horse Canyon Compressor Station**  
**Groundwater Discharge Plan GW-61**

---

This document constitutes an application to renew Groundwater Discharge Plan GW-61 for the Horse Canyon Compressor Station. Discharge Plan GW-61 was approved by the New Mexico Oil Conservation Division (NMOCD) on June 6, 1991, it expires on June 5, 1996. Modifications to the plan to incorporate plant expansions were approved by the OCD in June 1992, October 9, 1992, and March 3, 1993. This renewal application consolidates the information presented in the original plan and covered by subsequent modifications. This renewal application has been prepared in accordance with the NMOCD "Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants, Oil Refineries, and Gas Compressor Stations" (revised 12-95) and New Mexico Water Quality Control Commission (WQCC) regulations 3-104 and 3-106.

**1 Type of Operation**

Horse Canyon Compressor Station is owned and operated by Williams Field Services (WFS) and provides metering, compression and dehydration services to various producers for the gathering of coal seam methane gas on a contract basis for ultimate delivery to the WFS Milagro Plant near Bloomfield, NM. WFS has contracted the day-to-day operation of the compression equipment to Production Operators, Inc. (POI).

**2 Operator/Legally Responsible Party**

**Operator**

Williams Field Services  
295 Chipeta Way  
PO Box 58900  
Salt Lake City, UT 84158-0900  
(801) 584-6543  
attention: Leigh Gooding

**Legally Responsible Party**

Williams Field Services  
295 Chipeta Way  
PO Box 58900  
Salt Lake City, UT 84158-0900  
(801) 584-6543  
attention: Leigh Gooding

**3 Location of Discharge/Facility**

San Juan County, NM  
Township 30 North, Range 9 West, NE/4 NE/4 sec. 27  
(appendix 1 contains a map of the site location)

## NOTICE OF PUBLICATION

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

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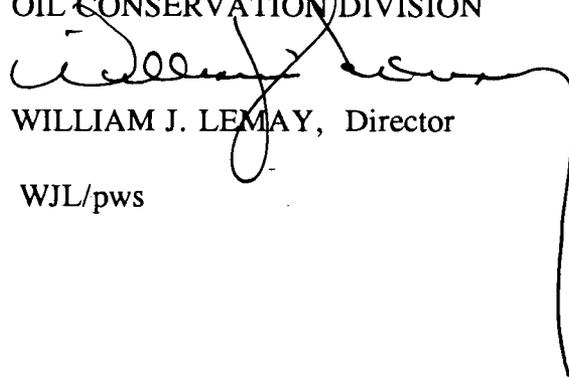
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 26th day of February, 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
WILLIAM J. LEMAY, Director

WJL/pws

S E A L

February 21, 1996



Roger C. Anderson  
Environmental Bureau Chief  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

RECEIVED

FEB 22 1996

Environmental Bureau  
Oil Conservation Division

Re: Groundwater Discharge Plan Renewals

Dear Mr. Anderson

On behalf of Williams Field Services and Williams Gas Processing - Blanco I am submitting renewal applications for the following Groundwater Discharge Plans.

GW-61 Horse Canyon Compressor Station, San Juan County  
GW-62 Manzanares Compressor Station, San Juan County  
GW-63 Pump Mesa Compressor Station, San Juan County  
GW-64 Middle Mesa Compressor Station, San Juan County  
GW-78 Five Points Compressor Station, Rio Arriba County  
GW-79 Wild Horse Compressor Station, Rio Arriba County

4665 INDIAN SCHOOL NE

SUITE 106

I am enclosing a check for \$ 300.00 to cover the filing fee for the 6 applications. If you have any questions or need clarification, please call me or Leigh Gooding of Williams Field Services at 801-584-6543.

ALBUQUERQUE

Sincerely,

Susan E. Boyle  
Project Manager

NEW MEXICO

87110

cc: w/attachments  
Denny Foust  
OCD Aztec Office

PHO 505 266 6611

Environmental Bureau  
Oil Conservation Division  
2040 S. Pacheco  
Santa Fe, NM 87505

RECEIVED 12/93

FEB 22 1996

Environmental Bureau  
Oil Conservation Division

6W-61

**DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS,  
OIL REFINERIES AND GAS COMPRESSOR STATIONS**

*(Refer to OCD Guidelines for assistance in completing the application.)*

- I. TYPE: Natural Gas Compressor Station - Horse Canyon Compressor Station
- II. OPERATOR: Williams Field Services  
ADDRESS: 295 Chipeta Way, Salt Lake City, Utah 84158-0900  
CONTACT PERSON: Leigh Gooding PHONE: 801-584-6543
- III. LOCATION: NE/4 NE/4 27  
NW/4 SW/4 Section ~~35~~ Township 30 North Range 9 West  
Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner(s) of the facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
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- XIII. CERTIFICATION

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

Name: Terry G. Spradlin

Manager,  
Title: Environmental Health and Safety

Signature: 

Date: 2-20-96

**Horse Canyon Compressor Station—Groundwater Discharge Plan**  
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# **Horse Canyon Compressor Station**

## **Groundwater Discharge Plan GW-61**

---

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### **2 Operator/Legally Responsible Party**

#### **Operator**

Williams Field Services  
295 Chipeta Way  
PO Box 58900  
Salt Lake City, UT 84158-0900  
(801) 584-6543  
attention: Leigh Gooding

#### **Legally Responsible Party**

Williams Field Services  
295 Chipeta Way  
PO Box 58900  
Salt Lake City, UT 84158-0900  
(801) 584-6543  
attention: Leigh Gooding

### **3 Location of Discharge/Facility**

San Juan County, NM  
Township 30 North, Range 9 West, NW/4 SW/4 sec. 35  
(appendix 1 contains a map of the site location)

#### 4 Landowner

The site is owned by Williams Field Services.

#### 5 Facility Description

Appendix 1 contains the facility layout. The facility removes liquids and CO<sub>2</sub> and compresses field gas as it travels toward the Milagro Plant. Field gas passes through an inlet scrubber owned and operated by AMOCO (Producer) and into the the compressor station. There are 14 compressors at the facility, 9 dehydration units, and 3 CO<sub>2</sub> membrane units.

#### 6 Materials Stored or Used

Table 1 identifies materials and storage methods for substances used and stored at the plant. The first column corresponds to the identification labels on the layout and effluent production diagrams in appendix 1 as well as the SPCC Plan.

**Table 1**  
**Materials Used and Stored**

<i><b>Id</b></i>	<i><b>Name</b></i>	<i><b>Composition</b></i>	<i><b>Type</b></i>	<i><b>Container</b></i>	<i><b>Capacity</b></i>
TK-a	Lube oil	Oil	Liquid	AGT	100 bbl
TK-b	Waste oil	Oil	Liquid	AGT	165 bbl
TK-c*	Lube oil	Oil	Liquid	AGT	500 gal
TK-d	Condensate	Hydrocarbons, water	Liquid	AGT	300 bbl
TK-e	Wastewater	Hydrocarbons, water, detergent	Liquid	AGT	165 bbl
TK-f1	Antifreeze	Ethylene glycol	Liquid	AGT	500 gal
TK-f2	Antifreeze	Ethylene glycol	Liquid	AGT	500 gal
TK-g	Condensate	Hydrocarbons, water	Liquid	AGT	400 bbl
TK-h	Solvent	Varsol	Liquid	AGT	500 gal
-	Filters	Drained waste	Solid	Drums	55-gal

AGT = aboveground tank (non-pressurized)

\* Tanks (TK-c1 through TK-c14) located adjacent to each compressor.

MSD Sheets are maintained on the site and will be provided to the OCD upon request.

#### 7 Sources and Quantities of Effluent and Waste Solids

Table 2 summarizes the effluent and solid wastes generated at the plant. The major sources of liquid and solid waste are described in the sections following table 2.



**Table 2**  
**Effluent and Solid Waste Sources, Quantity, Quality, and Disposition**

<i>Source</i>	<i>Waste/Quality</i>	<i>Quantity</i>	<i>Disposition</i>
Compressor engines	Drained oil	< 165 bbl 2x/yr	TK-b Waste oil tank Removed by contractor for recycling
Separators, scrubbers, CO2 pretreat units	Natural gas liquids	< 300 bbl 52x/yr	TK-d Condensate tank Removed by contractor to injection facility
Condensate tank bottoms, engine washwater, storage area rainwater, CO2 units	Water, hydrocarbons, coolant, detergent, solvent	<165 bbl 24x/yr	TK-e Wastewater tank Removed by contractor to injection facility
Pig receiver condensate, inlet scrubber	Natural gas liquids	varies	TK-g Condensate tank Owned and operated by Producer
Used engine oil filters, sorbents	Special solid waste	1-3 filters/unit 4x/yr	Removed by POI to special waste container at POI office. Bin picked up by Waste Management and taken to special waste landfill
Used dehydrator glycol filters	Special solid waste	1 filter/unit 4x/yr	Removed by WFS to special waste container at District office. Bin picked up by Waste Management and taken to special waste landfill
Used CO2 unit filters, silicon beads from guard bed	Special solid waste	7 filters/skid 3x/yr	Removed by WFS to special waste container at District office. Bin picked up by Waste Management and taken to special waste landfill
Trash	Solid waste	varies	Removed by Waste Management to landfill
Porta-potty	Sewage	varies	Removed by contractor

**Separators/Scrubbers**

Liquids from the pulsation bottle, suction scrubbers at each engine, filter separators, header dumps, CO2 units, and dehydrator separators discharge into the condensate

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tank TK-d via underground piping. The amount of liquids accumulated by these units varies and is dependent upon the moisture content of the inlet gas stream.

The Producer operates an inlet separator at the facility which discharges liquids into the Producer's condensate tank TK-g.

#### **Boilers and Cooling Towers/Fans**

There are no boilers or cooling towers/fans located at the facility.

#### **Process and Storage Equipment Wash Down**

Oily waste water is generated during wash down of the compressor engines. Engine wash water contains water and detergent with trace amounts of lube oil, coolant and solvent. Compressor engines are washed down once per month. A maximum of 80 gallons of wash water is generated during each washing. Each compressor skid is equipped with a drain line which transports wash water to waste water tank TK-e. No RCRA-listed hazardous wastes are contained in the wash water.

Drums, tanks, and trucks are not washed at the facility.

#### **Solvents/Degreasers**

Less than 1 gallons per unit of dishwashing-type detergent is used for compressor engine wash down. Detergent is brought to the site as needed by the contractor responsible for performing the wash. Solvent is stored on site in an above-ground tank TK-h. Less than 10 gallons per month of solvent is used at the site. Wash water collection and storage is discussed above in Process and Storage Equipment Wash Down.

#### **Spent Acids/Caustics**

There are no spent acids or caustics at the facility.

#### **Used Engine Coolants**

A composition of 50 percent antifreeze and 50 percent water is used to cool the compressor engines at the facility. Prior to use, antifreeze is stored in tanks TK-f1 and TK-f2. No waste coolant is generated as engine use causes the coolant to evaporate.

#### **Waste Lubrication and Motor Oils**

The engine oil of the Aerial compressor units is changed twice per year. The engine oil of the White compressor units is changed 4 times per year. Waste oil from the units is drained via underground lines to the waste oil tank TK-b. The contents of TK-b are emptied about twice a year.

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### **Used Filters**

The Aerial compressor units each generate 3 filters with every oil change, the White compressor units each generate 1 filter with every oil change. After removal from the engines, these items are placed on a drain unit located in the truck loading and-containment area. Drained socks and filters are stored in closed containers prior to removal from the site.

Each of the dehydrator units generates 1 glycol filter per quarter. Spent units are stored in closed 55-gallon drums on one of the dehy skids until removed by WFS to a special waste container at their District office.

Each of the CO<sub>2</sub> processing skids generates up to 7 waste filters. Filters are changed as needed, but never more than three times a year. Silicon beads from the guard beds may be changed as often as once a year.

### **Solids and Sludges**

No solids or sludges are generated at the facility.

### **Painting Wastes**

No painting wastes are generated at the facility.

### **Sewage**

A porta-potty is located at the facility. It is owned and maintained by a contractor who removes liquids for off-site disposal as necessary.

### **Lab Wastes**

The facility is not equipped with a lab.

### **Other Liquid and Solid Wastes**

Paper and other solid waste, excluding filters and sorbents, are removed from the site weekly by Waste Management.

## **8 Liquid and Solid Waste Collection/Storage/Disposal**

This section provides a general description of the collection, storage, and disposal systems used for effluents and solid wastes generated at the plant. Section 7 identifies the specific collection, storage, and disposal method utilized for each of the effluents generated at the plant.

### **Collection**

Wastewater from the on-site equipment is transported to the waste water tank TK-b via 4-inch diameter underground PVC piping. Natural gas liquids are transported to the



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condensate tank TK-d via 2-inch diameter underground steel piping. Waste oil is transported to the waste oil tank TK-b via 4-inch diameter underground steel piping. Lube oil is transported to each of the compressor units from their respective lube oil tanks TK-h via 2-inch diameter underground steel piping.

Natural gas liquids are transported from the Producers pig receiver and inlet scrubber via underground lines to the Producer's condensate tank TK-g.

All underground piping was installed in 1990 when the facility was constructed. Hydrostatic testing of underground effluent pipelines has not been conducted at the facility. Hydrostatic testing will take place within the five-year period of the renewed discharge plan. WFS will submit a plan and timetable for hydrostatic testing of the underground effluent pipelines for OCD approval 6 months prior to the planned test.

### **Storage**

All storage tanks located at the facility are constructed of steel. They are all situated on gravel.

The condensate tank TK-d, wastewater tank TK-e, waste oil tank TK-b, and lube oil tank TK-a are surrounded by a gravel berm which was constructed to contain approximately 133% the volume of the largest tank. The Producer's condensate tank TK-g is surrounded by a gravel berm which was constructed to contain approximately 133% of its contents.

All of the lube oil tanks TK-c1 through TK-c14 and the solvent tank TK-h are on saddleracks. For overflow containment, tanks on saddle racks are underlain by concrete splash aprons equipped with retention curbs or have containment of piping and valving. Fluids which collect within the curbed area drain through a pipe into a closed containment system.

The antifreeze tanks TK-f1 and TK-f2 are on elevated stands located within the barrel storage area. The barrel storage area is constructed of concrete and is curbed. Rainwater from the pad drains into the wastewater tank TK-e.

### **On-Site Disposal**

There are no on-site disposal facilities at the facility.

### **Off-site Disposal**

All effluent and waste is removed and disposed of as identified on table 3.



**Table 3**  
**Off Site Disposal Contractors and Disposal Facilities**

<i>Waste</i>	<i>Removal Contractor</i>	<i>Disposal Facility</i>
Wastewater and condensate	Triple-S Trucking Aztec, NM 505-334-6193	Basin Disposal Co. 6 CR 5046 Bloomfield, NM 505-325-6336 OGRID #001739
Used oil	D&D Oil Recycling Bloomfield, NM 505-632-9130	D&D Oil Recycling Bloomfield, NM 505-632-9130
Filters and sorbents	Waste Management (picked up at WFS District office at Milagro plant or POI office in Aztec)	San Juan County Regional Landfill #78 County Rd 3140 Farmington, NM 505-334-1121

### **9 Proposed Modifications**

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

### **10 Inspection, Maintenance, and Reporting**

The facility is inspected daily by the operator. Maintenance is performed and records are kept according to POI and WFS procedures.

### **11 Spill/Leak Prevention and Reporting (Contingency Plans)**

The station is graveled to allow for early leak detection and quick response by facility personnel in the event of a leak of process fluids. POI is contractually obligated to handle all spills as required by the SPCC Plan and WFS procedures and to report all spills and leak, according to the requirements of the state of New Mexico found in NMOCD Rule 116 and WQCC Section 1203. Copies of these regulations are in appendix 3.

### **12 Site Characteristics**

Appendix 4 contains the information regarding site characteristics from the facility's initial application for groundwater discharge plan approval.

### **13 Additional Information**

#### **History of Ownership and Compliance**

The facility commenced operation in 1991 under discharge plan GW-61. The facility



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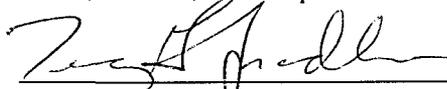
discharge plan was subsequently modified to reflect equipment changes in 1992 and 1993. Appendix 5 contains copies of all relevant documentation.

**Closure Plan**

All reasonable and necessary measures will be taken to prevent the exceedance of WQCC Section 3103 quality standards should WFS choose to permanently close the facility. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. 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.

**Affirmation**

I hereby certify that I am familiar with the information contained in and submitted with this discharge plan for the Horse Canyon Compressor Station and that such information is true, accurate, and complete to the best of my knowledge and belief.

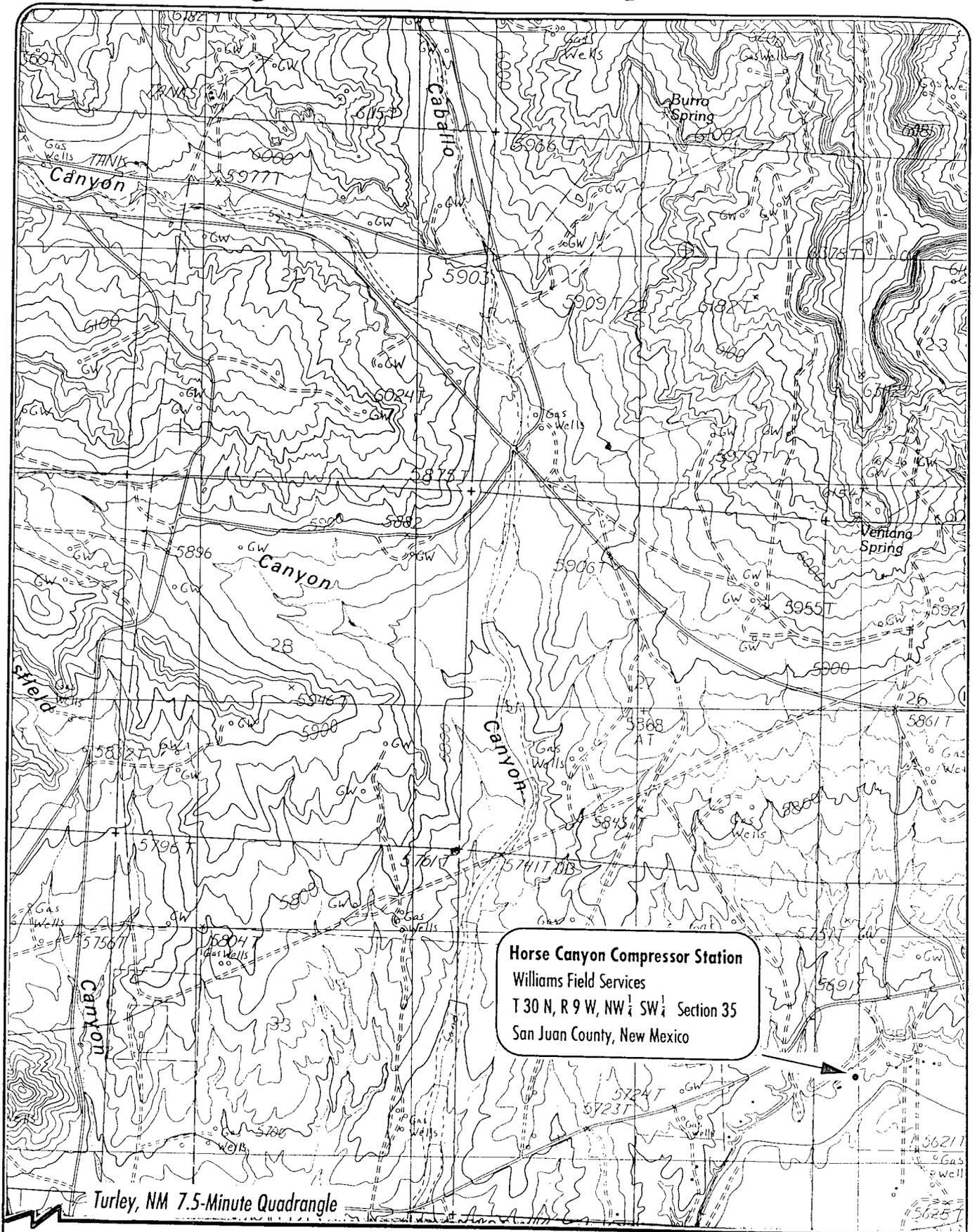


Terry G. Spradlin  
Manager, Environmental Health and Safety  
Williams Field Services

2-20-96

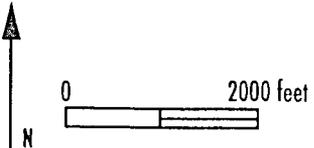
Date



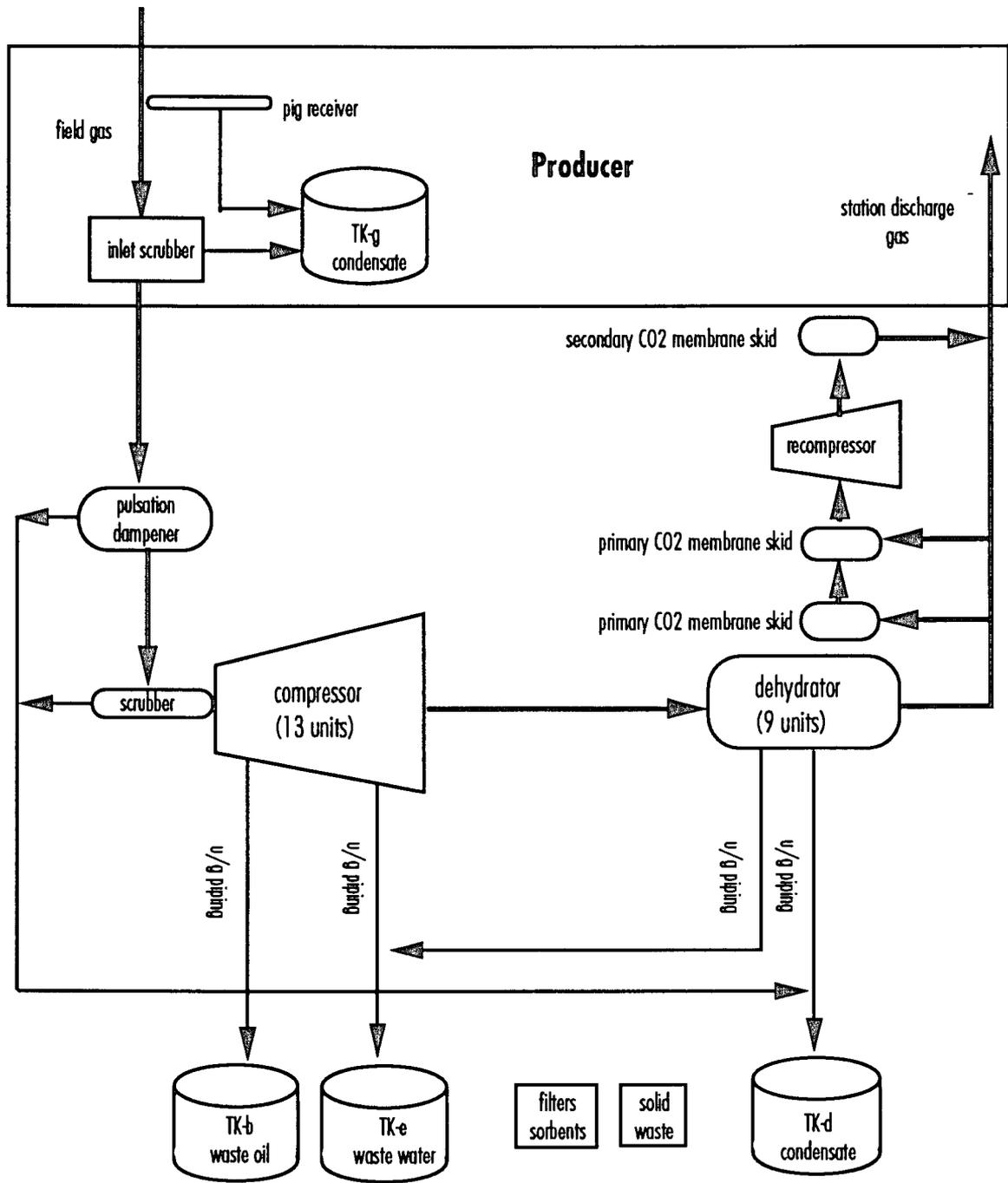


**Horse Canyon Compressor Station**  
 Williams Field Services  
 T 30 N, R 9 W, NW 1/4 SW 1/4 Section 35  
 San Juan County, New Mexico

Turley, NM 7.5-Minute Quadrangle



## Location of Horse Canyon Compressor Station



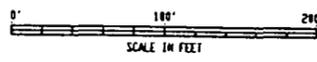
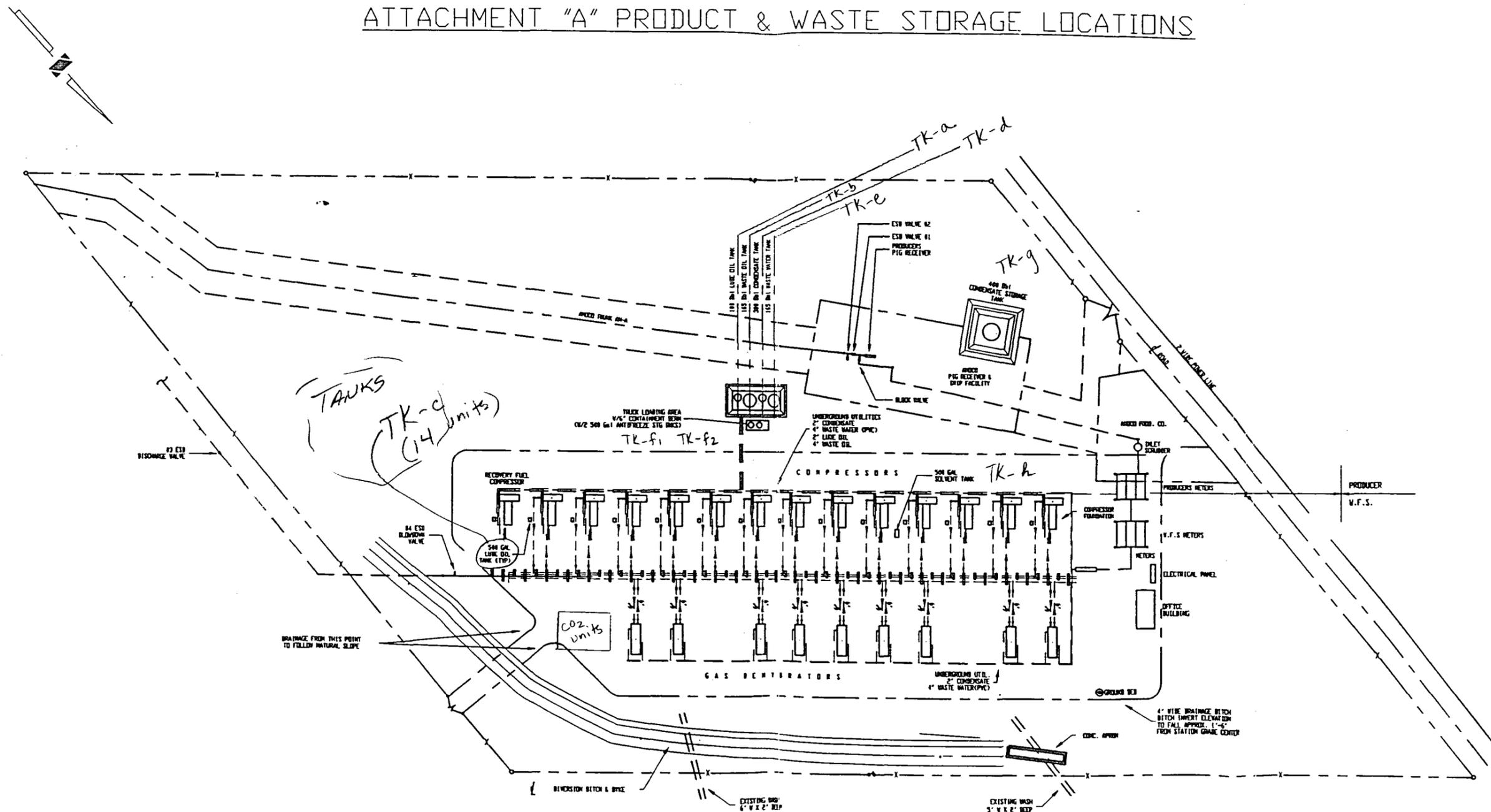
**Horse Canyon Compressor Station Effluent and Solid Waste Production Diagram**

**GATHERING**

Manual	HORSE CANYON C.D.P. COMPRESSOR STATION	
Section	EMERGENCY OPERATIONS PROCEDURES	Document No. 42.13.001
Effective Date	JANUARY, 1995	Page No. 3 of 5
Tab	13	Issue No. 04

Subject or Title: SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS



RULE 113. - SHOOTING AND CHEMICAL TREATMENT OF WELLS

(as of 3-1-91)

If injury results to the producing formation, injection interval, casing or casing seat from shooting, fracturing, or treating a well and which injury may create underground waste or contamination of fresh water, the operator shall give written notice to the Division within five (5) working days and proceed with diligence to use the appropriate method and means for rectifying such damage. If shooting, fracturing, or chemical treating results in irreparable injury to the well the Division may require the operator to properly plug and abandon the well.

RULE 114. - SAFETY REGULATIONS

(as of 3-1-91)

A. All oil wells shall be cleaned into a pit or tank, not less than 40 feet from the derrick floor and 150 feet from any fire hazard. All flowing oil wells must be produced through an oil and gas separator of ample capacity and in good working order. No boiler or portable electric lighting generator shall be placed or remain nearer than 150 feet to any producing well or oil tank. Any rubbish or debris that might constitute a fire hazard shall be removed to a distance of at least 150 feet from the vicinity of wells and tanks. All waste shall be burned or disposed of in such manner as to avoid creating a fire hazard.

B. When coming out of the hole with drill pipe, drilling fluid shall be circulated until equalized and subsequently drilling fluid level shall be maintained at a height sufficient to control subsurface pressures. During course of drilling blowout preventers shall be tested at least once each 24-hour period.

RULE 115. - WELL AND LEASE EQUIPMENT

(as of 3-1-91)

A. Christmas tree fittings or wellhead connections shall be installed and maintained in first class condition so that all necessary pressure tests may easily be made on flowing wells. On oil wells the Christmas tree fittings shall have a test pressure rating at least equivalent to the calculated or known pressure in the reservoir from which production is expected. On gas wells the Christmas tree fittings shall have a test pressure equivalent to at least 150 percent of the calculated or known pressure in the reservoir from which production is expected.

B. Valves shall be installed and maintained in good working order to permit pressures to be obtained on both casing and tubing. Each flowing well shall be equipped to control properly the flowing of each well, and in case of an oil well, shall be produced into an oil and gas separator of a type generally used in the industry.

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS  
AND BLOWOUTS

*(Due to be  
been seen -  
still correct  
1/96)*

(as of 3-1-91)

A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with

oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

(3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

(4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.

(7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of

the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

(8) SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

(9) CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

(10) WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

RULE 117. - WELL LOG, COMPLETION AND WORKOVER REPORTS

(as of 3-1-91)

Within 20 days after the completion of a well drilled for oil or gas, or the recompletion of a well into a different common source of supply, a completion report shall be filed with the Division on Form C-105. For the purpose of this rule, any hole drilled or cored below fresh water or which penetrates oil- or gas-bearing formations or which is drilled by an "owner" as defined herein shall be presumed to be a well drilled for oil or gas.

RULE 118. - HYDROGEN SULFIDE GAS - PUBLIC SAFETY

(as of 3-1-91)

A. The intent of this rule is to provide for the protection of the public's safety in areas where hydrogen sulfide ( $H_2S$ ) gas in concentrations greater than 100 parts per million (PPM) may be encountered.

B. Producing operations should be conducted with due consideration and guidance from American Petroleum Institute (API) publication "Conducting Oil and Gas Production Operations Involving Hydrogen Sulfide" (RP-55). The operator of a lease producing, or a gas processing plant handling  $H_2S$  or any other related facility where  $H_2S$  gas is present in concentrations of 100 PPM or more shall take reasonable measures to forewarn and safeguard persons having occasion to be on or near the property. In addition to training operator's employees in  $H_2S$  safety such measures may include, but are not necessarily limited to, posting of warning signs, fencing of surface installations, installation of safety devices and wind direction indicators, and maintaining tanks, thief hatches and gaskets, valves and piping in condition so as to prevent avoidable loss of vapors. Where release of hydrogen sulfide is unavoidable, the operator shall burn or vent the gas stream in such a manner as to avoid endangering human life.

C. Wells drilled in known  $H_2S$  gas producing areas, or where there is substantial probability of encountering  $H_2S$  gas in concentrations of 100 PPM or more, should be planned and drilled with due regard to and guidance from API RP-49 "Recommended Practices for Safe Drilling of Wells Containing Hydrogen Sulfide", latest edition. Wells completed and serviced by well servicing units where there is substantial probability of encountering  $H_2S$  gas in concentrations of 100 PPM or more should be worked on with due regard to the latest industry accepted practices. These practices may include, but are not necessarily limited to, the proper training of personnel in  $H_2S$  safety and the use of  $H_2S$  safety equipment as listed for safe operations by the American Petroleum Institute draft report for "Land, Oil and Gas Well Servicing and Workover Operations Involving Hydrogen Sulfide."\*

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B. Plans, specifications and reports required by this Section, if related to facilities for the production, refinement and pipeline transmission of oil and gas, or products thereof, shall be filed instead with the Oil Conservation Division. [1-4-68, 12-1-95]

C. Plans and specifications required to be filed under this Section must be filed prior to the commencement of construction. [9-3-72]

**1203. NOTIFICATION OF DISCHARGE--REMOVAL.**

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required: [2-17-74, 12-24-87]

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief of the Ground Water Protection and Remediation Bureau of the department, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

- a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;
- b. the name and address of the facility;
- c. the date, time, location, and duration of the discharge;
- d. the source and cause of discharge;
- e. a description of the discharge, including its chemical composition;
- f. the estimated volume of the discharge; and
- g. any actions taken to mitigate immediate damage from the discharge.

[2-17-74, 2-20-81, 12-24-87, 12-1-95]

2. When in doubt as to which agency to notify, the

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person in charge of the facility shall notify the Chief of the Ground Water Protection and Remediation Bureau of the department. If that department does not have authority pursuant to commission delegation, the department shall notify the appropriate constituent agency. [12-24-87, 12-1-95]

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same department official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification. [12-24-87]

4. The oral and written notification and reporting requirements contained in this Subsection A are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein. [2-17-74, 12-24-87]

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge. [2-17-74, 12-24-87]

6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief of the Ground Water Protection and Remediation Bureau of the department or appropriate counterpart in a delegated agency, in an effort to determine the department's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days. [12-24-87, 12-1-95]

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the department. In the event that the report is not satisfactory to the department, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified

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time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the department. [12-24-87]

8. In the event that the modified corrective action report also is unsatisfactory to the department, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the department secretary. The department secretary shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the secretary concerning the shortcomings of the modified corrective action report, the department may take whatever enforcement or legal action it deems necessary or appropriate. [12-24-87, 12-1-95]

9. If the secretary determines that the discharge causes or may with reasonable probability cause water pollution in excess of the standards and requirements of Section 4103 of this Part, and the water pollution will not be abated within one hundred and eighty (180) days after notice is required to be given pursuant to Section 1203.A.1 of this Part, the secretary may notify the facility owner/operator that he is a responsible person and that an abatement plan may be required pursuant to Sections 4104 and 4106.A of this Part. [12-1-95]

B. Exempt from the requirements of this Section are continuous or periodic discharges which are made: [2-17-74]

1. in conformance with regulations of the commission and rules, regulations or orders of other state or federal agencies; or [2-17-74]

2. in violation of regulations of the commission, but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies. [2-17-74]

C. As used in this Section and in Sections 4100 through 4115, but not in other Sections of this Part: [2-17-74, 12-1-95]

1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water; [2-17-74]

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling

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stock, or activity of any kind, whether stationary or mobile;  
[2-17-74]

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes; [2-17-74]

4. "operator" means the person or persons responsible for the overall operations of a facility; and [12-24-87]

5. "owner" means the person or persons who own a facility, or part of a facility. [12-24-87]

D. Notification of discharge received pursuant to this Part or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement. [2-17-74]

E. Any person who has any information relating to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, is urged to notify the Chief of the Ground Water Protection and Remediation Bureau of the department. Upon such notification, the secretary may require an owner/operator or a responsible person to perform corrective actions pursuant to Sections 1203.A.5 or 1203.A.9 of this Part. [12-1-95]

[1204-1209] Reserved

1210. VARIANCE PETITIONS.

A. Any person seeking a variance pursuant to Section 74-6-4 (G) NMSA 1978, shall do so by filing a written petition with the commission. The petitioner may submit with his petition any relevant documents or material which the petitioner believes would support his petition. Petitions shall: [7-19-68, 11-27-70, 9-3-72]

1. state the petitioner's name and address;  
[7-19-68, 11-27-70]

2. state the date of the petition; [7-19-68]

3. describe the facility or activity for which the variance is sought; [7-19-68, 11-27-70]

4. state the address or description of the property upon which the facility is located; [11-27-70]

**WILLIAMS FIELD SERVICES COMPANY**  
 ONE OF THE WILLIAMS COMPANIES   
**OPERATIONS**

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
Effective Date 6-10-93	Issue No. 1	Page No. 1 of 6

Subject of Title

DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

**A. PURPOSE AND SCOPE**

- A.1 To establish the policy and procedure for preventing, controlling, and reporting of spills or discharges of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
- A.2 This document pertains to Company personnel and Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

**B. CONTENTS**

**C. POLICY**

- C.1 General
- C.2 Bulk Storage Tanks
- C.3 Facility Drainage
- C.4 Transfer Operations, Pumping, and In-Plant/Station Process
- C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack

**D. PROCEDURE**

- D.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of a Hazardous or Toxic Substance
- D.2 Submitting Written Notification of a Discharge or Spill

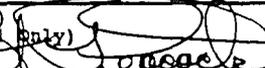
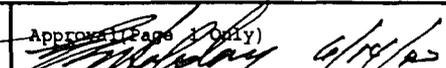
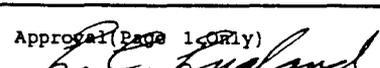
ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

**C. POLICY**

**C.1 GENERAL**

- C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.
- C.1.2 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
  - a. Section 101 (N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
  - b. Section 307(a) and Section 311 (b)(2)(A) of the Clean Water Act
  - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
  - d. Section 112 of the Clean Air Act
  - e. Section 7 of the Toxic Substance Control Act

Supersedes Policy and Procedure 12.10.020 dated July 7, 1989.

Approval (Page 1 Only) 	Approval (Page 1 Only) 	Approval (Page 1 Only) 
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# OPERATIONS

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
Effective Date 6-16-93	Issue No. 1	Page No. 2 of 6

Subject of Title

DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

- C.1.3 The term hazardous substance does not include petroleum, including crude oil or any fraction thereof, which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.4 Oil, for the purpose of this document, means oil of any kind or in any form, including but not limited to petroleum, fuel oil, Y grade, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) are not considered to be oil.
- C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the required federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
- a. Non-Transportation Related Facilities
    - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
    - (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
  - b. Transportation Related Facilities
    - (1) All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.
- C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all hazardous substance storage vessels at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.
- C.1.8 The facility supervisor is responsible for spill prevention. His/her duties include, but are not limited to, the following:
- a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
  - b. Conduct briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
  - c. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.
- C.1.9 Each individual facility is checked by the supervisor or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.

## OIL CONSERVATION DIVISION

October 18, 1995

CERTIFIED MAIL  
RETURN RECEIPT NO. Z-765-963-079

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

RE: **Discharge Plan GW-61 Renewal**  
**Horse Canyon CDP**  
**San Juan County, New Mexico**

Dear Ms. Gooding:

On June 6, 1991, the groundwater discharge plan, GW-61, for the Williams Field Services CDP located in SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, **will expire on June 5, 1996**. The plan was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, you must renew your discharge plan. **If Williams Field Services submits an application for renewal at least 120 days before the discharge plan expires (on or before February 5, 1996), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether you have made, or intend to make, any changes in your system, and if so, please include these modifications in your application for renewal.

The discharge plan renewal application for the Horse Canyon CDP is subject to the WQCC Regulations 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus a flat fee of \$690 for Compressor Stations over 3,000 horsepower.

The (50) dollar filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan - with the first payment due at the time of approval. Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

Ms. Leigh Gooding  
October 18, 1995  
Page 2

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request. The following information is included: Application form, Guidelines, and WQCC regulations.

If you no longer have any actual or potential discharges a discharge plan is not needed, please notify this office. If you have any questions regarding this matter, please do not hesitate to contact Patricio W. Sanchez at (505) 827-7156.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

RCA/pws

xc: Mr. Denny Foust

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800  
FAX. (801) 584-6483

February 17, 1993

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87504

Re: Manzanares System C.D.P. Facility Expansion - San Juan and Rio Arriba  
Counties

Dear Mr. Anderson:

The attached table summarizes the anticipated current and future expansion of the Williams Field Services' Manzanares Gathering System C.D.P.'s, and the corresponding increase in waste fluids which will be generated at these locations. Although new compressors and/or dehydrators are being added at these sites, no additional bulk storage for waste liquids (used oil, waste water, etc.) will be installed above that which is currently located at the facilities.

Williams Field Services believes that the addition of these units will result in insignificant increases in the fluids handled at the specific C.D.P.'s. Please review this table and advise me of any Discharge Plan modifications which you determine will be necessary.

Thank you for your attention to this matter.

Sincerely,

*Carol Revelt*

Carol Revelt  
Environmental Specialist

Attachment

cc: D. Compton, 10309  
J. West, MND

WILLIAMS FIELD SERVICES - MANZANARES GATHERING SYSTEM  
CENTRAL DELIVERY POINT EXPANSION/MODIFICATION

<u>C.D.P. Name</u>	<u>Location</u>	<u>Discharge Permit #</u>	<u>Original # Compressors</u>	<u>Additional Compressors</u>	<u>Anticipated Additional Waste-Oil Generated</u>	<u>Original # Dehydrators</u>	<u>Additional Dehydrators</u>	<u>Anticipated Additional Waste Water Generated</u>
29-6 No. 2	Sec. 10, 29N, 6W Rio Arriba County	GW-121	5	2	250 gal/quarter	5	2	30 gal/day
29-6 No. 4	Sec. 19, 29N, 6W Rio Arriba County	GW-122	4	3	375 gal/quarter	2	2	30 gal/day
31-6 No. 1	Sec. 1, 30N, 6W Rio Arriba County	GW-118	5	4	500 gal/quarter	5	4	60 gal/day
32-7 No. 1	Sec. 34, 32N, 7W San Juan County	GW-117	4	---	---	2	1	15 gal/day
32-8 No. 2	Sec. 27, 32N, 8W San Juan County	GW-111	4	---	---	2	1	15 gal/day
32-8 No. 3	Sec. 9, 31N, 8W San Juan County	GW-116	4	2	250 gal/quarter	2	1	15 gal/day
Cedar Hill	Sec. 28, 32N, 10W San Juan County	GW-87	5	1	125 gal/quarter	3	3	45 gal/day
Horse Canyon	Sec. 27, 30N, 9W San Juan County	GW-61	14	---	---	9	1	15 gal/day
Middle Mesa	Sec. 10, 31N, 7W San Juan County	GW-64	7	---	---	4	3	45 gal/day
Pump Mesa	Sec. 14, 31N, 8W San Juan County	GW-63	6	6	750 gal/quarter	4	4	60 gal/day
Sims Mesa	Sec. 22, 30N, 7W Rio Arriba County	GW-68	7	---	---	5	1	15 gal/day

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



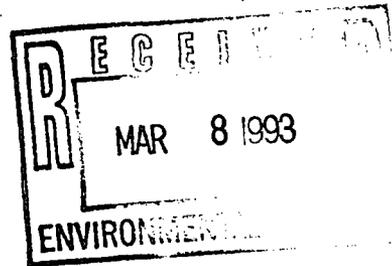
BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

March 3, 1993

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-111-334-304**



Ms. Carol Revelt  
Environmental Specialist  
Williams Field Services Company  
P.O. Box 58900  
Salt Lake City, Utah

**Re: Discharge Plan Modifications  
Manzanares Gathering System  
San Juan County, New Mexico  
Rio Arriba County, New Mexico**

Dear Ms. Revelt:

The Oil Conservation Division (OCD) has received your letter dated February 17, 1993 requesting a determination on Williams Field Services' proposed modifications of existing compressor facilities as to what effect this would have on the existing discharge plans. The discharge plan modifications were submitted pursuant to Section 3-109.F. of the New Mexico Water Quality Control Commission (WQCC) Regulations.

Pursuant to WQCC Regulation 3-109.F. the modification to the previously approved discharge plans are hereby approved. The OCD has determined that these modifications are minor, therefore, public notice was not issued and the required flat rate fee for modification of a discharge plan is waived. However, the regulations require that a fifty (50) dollar filing fee be paid for each of the eleven specified facilities. The filing fee for the discharge plan modifications are due upon receipt of this letter.

Please make checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

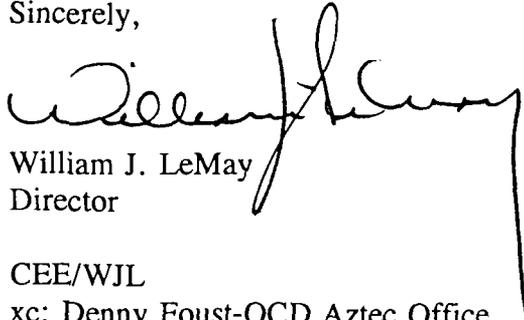
Ms. Carol Revelt  
March 3, 1993  
Page 2

The approved modifications are to the following facilities:

- (GW-121) San Juan 29-6 No.2 C.D.P. Compressor Station
- (GW-122) San Juan 29-6 No.4 C.D.P. Compressor Station
- (GW-118) San Juan 31-6 No.1 C.D.P. Compressor Station
- (GW-117) San Juan 32-7 No.1 C.D.P. Compressor Station
- (GW-111) San Juan 32-8 No.2 C.D.P. Compressor Station
- (GW-116) San Juan 32-8 No.2 C.D.P. Compressor Station
- (GW-87) Cedar Hill Compressor Station
- (GW-61) Horse Canyon Compressor Station
- (GW-64) Middle Mesa Compressor Station
- (GW-63) Pump Mesa Compressor Station
- (GW-68) Sims Mesa Compressor Station

If you have any question you can contact the Environmental Bureau at (505) 827-5812.

Sincerely,



William J. LeMay  
Director

CEE/WJL  
xc: Denny Foust-OCD Aztec Office  
11 Discharge Plan files

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800  
FAX (801) 584-6483

June 1, 1992

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87504

Re: Horse Canyon Compressor Station Discharge Plan Update - San Juan County

Dear Mr. Anderson:

Attached please find information pertaining to modifications at the Williams Field Services Horse Canyon Compressor Station, the original discharge plan for which was approved on June 1, 1992 (GW-61). Williams Field Services believes that these facility modifications will not appreciably change the quality or volume of the discharge water generated at the facility above that which was specified in the original discharge plan.

If NMOCOD determines that the modifications indicated in the attached document require a major modification of the existing discharge plan, Williams Field Services will submit a discharge plan modification for your review and approval.

Please call me at (801) 584-6716 if you have any questions or need additional information.

Sincerely,

*Carol Revelt*

Carol Revelt  
Environmental Specialist

Attachment

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800  
FAX (801) 584-6483

September 28, 1992

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87504

Re: Horse Canyon Compressor Station Discharge Plan Update - San Juan County

Dear Mr. Anderson:

Attached please find information pertaining to modifications at the Williams Field Services Horse Canyon Compressor Station, the original discharge plan for which was approved on June 1, 1992 (GW-61). Williams Field Services believes that these facility modifications will not appreciably change the quality or volume of the discharge water generated at the facility above that which was specified in the original discharge plan.

If NMOCD determines that the modifications indicated in the attached document require a major modification of the existing discharge plan, Williams Field Services will submit a discharge plan modification for your review and approval.

Please call me at (801) 584-6716 if you have any questions or need additional information.

Sincerely,

*Carol Revelt*

Carol Revelt  
Environmental Specialist

Attachment

## HORSE CANYON COMPRESSOR STATION DISCHARGE PLAN UPDATE

### I. BACKGROUND INFORMATION

On February 21, 1991, Williams Field Services (WFS) submitted a discharge plan for the Horse Canyon Compressor Station to the New Mexico Oil Conservation Division (OCD) for review and approval. The plan covered the discharges associated with the installation of eleven (11) 895 hp skid-mounted, self-contained, natural gas fired lean-burn compressor units, seven (7) skid-mounted, self contained glycol dehydration units, and associated equipment. The plan, GW-61, was subsequently approved by OCD on June 6, 1991.

The terms of the discharge plan approval indicate that Section 3-104 of the New Mexico Water Quality Control Regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." In addition, pursuant to Section 3-107.C, WFS is required to notify the Director of the OCD of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

### II. EXPANSION AT THE HORSE CANYON COMPRESSOR STATION

As indicated below, WFS has modified the Horse Canyon Compressor Station. WFS believes that the modifications which have been or will be implemented have not resulted in an appreciable change in the quantity or quality of process waste fluids generated at the site from that which was specified in the original discharge plan.

#### A. Additional Compression and Dehydration

Since the original discharge plan approval, Williams Field Services has expanded the facility by installing three (3) additional 895 hp skid-mounted, natural gas-fired lean-burn compressor units, two (2) additional glycol dehydration units, and associated equipment. The location of these additional units is shown in Figure 1. These compressors have been installed exactly as the initial units at Horse Canyon, including the placement of all spill and leak prevention devices.

Waste-management data collected by P.O.I., the designated Horse Canyon facility operator, indicate that the installation of these units has not resulted in an increase in the amount of fluids generated at this facility above that mentioned in the February, 1991 discharge plan. In mid-September, 1992, P.O.I. indicated that since startup of the facility in early 1991 only approximately 6,000 gallons of used oil have been hauled from the facility, which is consistent with the terms of the original discharge plan. As the compressor units become older, however, the oil will be changed more frequently and the amount of used oil generated will approach 1750 gallons per quarter, a 375 gallon per quarter increase over the projection of 1375 gallons per quarter contained in the original discharge plan.

With respect to the quantities of condensate and waste water collected, a total of approximately three - 80 barrel loads are transported from the site per month. P.O.I. estimates that the source of the majority of this fluid is the compressor station inlet suction scrubber, which removes fluids present in the inlet gas which have been introduced into the pipeline by production upsets upstream of the Horse Canyon compressor station. Again, the addition of the dehydrators has not contributed to an appreciable increase in the quantity of fluids generated at the facility.

## B. CO<sub>2</sub> Removal Facilities

In addition to the compression and dehydration modification, in mid-October WFS will install two primary and one secondary CO<sub>2</sub> removal membrane units at the Horse Canyon Compressor Station (see Figure 1 for the location of the membrane units within the compressor station). These units are designed to reduce the CO<sub>2</sub> content of the all of the gas flowing through the Horse Canyon compressor station from 10% to 7%. Attachments 1, 2, and 3 present the design of the membrane system.

The membrane units are mounted on decked, sealed skids equipped with steel bottoms and pollution rails to capture any potential leaks and rain water. The primary membrane units, each of which will handle approximately 50% of the gas stream, consist of a pretreat skid containing an inlet filter separator and a guard bed of silica gel. These filters will remove any potential liquid and solid impurities from the gas before it passes through the membrane itself. Once the gas has been pretreated, it will flow through the attached primary membrane unit where the CO<sub>2</sub> concentration in the gas will be reduced from 10% to 7%. The residue gas from both of the primary membranes will be discharged into the station discharge line for ultimate delivery to the Milagro Gas Plant, located in Bloomfield, New Mexico. The permeate from the primary membranes, which contains both CO<sub>2</sub> and methane, will then be re-compressed by an existing compressor and sent through a secondary membrane unit where a secondary separation will occur. The permeate from the secondary membrane will be directed a vent stack and the residual natural gas will be discharged into either the station fuel gas system or the suction line.

Liquid wastes from the pretreat and membrane skids, consisting of rain water and washdown water, will be directed to the existing waste water storage tank. Condensate waste from pretreat unit, primary and secondary membranes, and the line drips will be directed to the existing condensate tank. Since the gas flowing into these units has been dehydrated immediately upstream of the membranes, insignificant quantities of liquids (i.e. estimated at less than 10 gallons per day total) are expected to be generated as a result of the installation of the membrane units. Any solid wastes associated with the operation of the membrane system, i.e., silica gel or the membranes themselves, will be disposed of according to local, state, and federal requirements.

In addition to the membrane system, in late August, 1992 WFS plans to install one more glycol dehydration at this facility. Again, WFS does not

anticipate that the operation of this dehydrator will result in an significant increase in volume of waste water handled at this site.

All wastes from the facility have been and will continue to be disposed of or recycled in accordance with the existing discharge plan.

No new types of liquid wastes have been or will be generated as a result of the recent and planned modifications at the Horse Canyon Compressor Station.

III. SUMMARY

Although modifications have occurred at or are scheduled for the Horse Canyon Compressor Station, WFS believes that these modifications will not result in a significant change in the volume of waste liquids generated at this facility. If the Oil Conservation Division determines that a future increase in the quantity of used oil generated at this facility (i.e. an increase of 375 gallons per quarter) requires a modification to the existing discharge permit, WFS will submit a revision to the existing discharge plan incorporating all of the above mentioned modifications.

P. Von McAllister  
Signature

P. Von McAllister  
Name

September 28, 1992  
Date

Project Manager  
Title

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



October 9, 1992

BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

Ms. Carol Revelt  
Williams Field Services Co.  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900

Re: Discharge Plan GW - 61

Dear Ms. Revelt:

The Oil Conservation Division (OCD) received your request, dated June 1, 1992, on September 29, 1992, to modify the previously approved discharge plan for the Horse Canyon Compressor Station located in the NE/4 NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County New Mexico. The modification consists of the addition of three (3) 895 hp compressor units. This modification will not alter the quality or quantity of discharges, therefore it is a minor modification and public notice is not required.

Based on the information provided in your request, modification of discharge plan GW-61 is hereby approved.

Please be advised that this approval does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

If you have any questions please call Roger Anderson at (505) 827-5812.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay".

William J. LeMay  
Director

xc: OCD Aztec Office

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

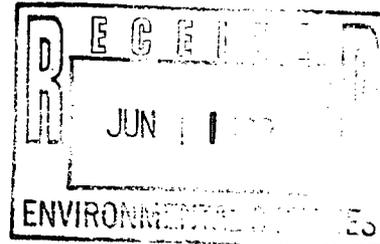
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

June 6, 1991

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

CERTIFIED MAIL  
RETURN RECEIPT NO. P-327-278-147



Ms. Sandy Fishler  
Williams Field Services  
P. O. Box 58900  
Salt Lake City, Utah 84158-0990

RE: Discharge Plan GW-61  
Horse Canyon Compressor Station  
San Juan County, New Mexico

Dear Ms. Fishler:

The groundwater discharge plan GW-61 for the Williams Field Services Horse Canyon Compressor Station located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM San Juan County, New Mexico is hereby approved. The discharge plan consists of the application dated December 3, 1990 and materials dated January 24, 1991 submitted as supplements to the application.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.A., please note Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

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

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Ms. Sandy Fishler

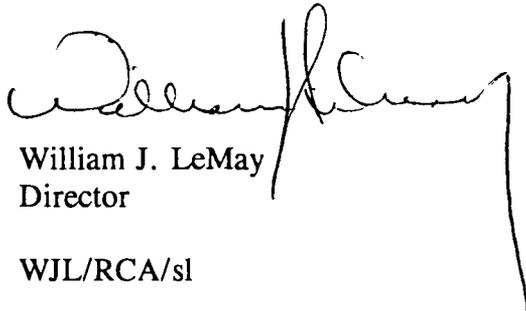
June 6, 1991

Page -2-

Pursuant to Section 3-109.G.4., this plan approval is for a period of five (5) years. This approval will expire June 5, 1996 and you should submit an application for renewal in ample time before that date.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



William J. LeMay  
Director

WJL/RCA/sl

cc: OCD Aztec Office



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



October 9, 1992

BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

Ms. Carol Revelt  
Williams Field Services Co.  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900

Re: Discharge Plan GW - 61

Dear Ms. Revelt:

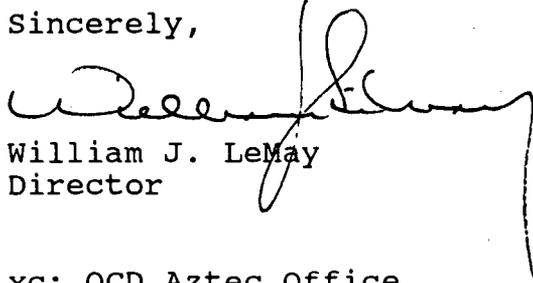
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Based on the information provided in your request, modification of discharge plan GW-61 is hereby approved.

Please be advised that this approval does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

If you have any questions please call Roger Anderson at (505) 827-5812.

Sincerely,

  
William J. LeMay  
Director

xc: OCD Aztec Office

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

June 5, 1991

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
Land Office Building  
P.O. Box 2088  
Santa Fe, NM 87504-2088

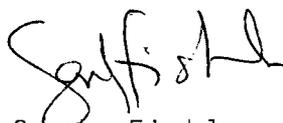
RE: Horse Canyon JW-61  
Manzanares JW-62  
Pump Mesa JW-63  
Middle Mesa JW-64

Dear Mr. Anderson:

Revised site plans are enclosed to replace Figure 2 in the Discharge Plans for Horse Canyon, Manzanares, Pump Mesa, and Middle Mesa Compressor Stations. The revision to Figure 2 depicts underground piping for process fluids, per your request.

Please call me at (801) 584-6730 if there are questions or comments regarding this submittal.

Sincerely,



Sandy Fishler  
Environmental Specialist

SF/pm

attachment(s)

0069

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800  
FAX: (801) 584-6483

June 1, 1992

**RECEIVED**

**SEP 29 1992**

**OIL CONSERVATION DIV.  
SANTA FE**

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87504

Re: Horse Canyon Compressor Station Discharge Plan Update - San Juan County

Dear Mr. Anderson:

Attached please find information pertaining to modifications at the Williams Field Services Horse Canyon Compressor Station, the original discharge plan for which was approved on June 1, 1992 (GW-61). Williams Field Services believes that these facility modifications will not appreciably change the quality or volume of the discharge water generated at the facility above that which was specified in the original discharge plan.

If NMOCD determines that the modifications indicated in the attached document require a major modification of the existing discharge plan, Williams Field Services will submit a discharge plan modification for your review and approval.

Please call me at (801) 584-6716 if you have any questions or need additional information.

Sincerely,

*Carol Revelt*

Carol Revelt  
Environmental Specialist

Attachment



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
Ecological Services  
Suite D, 3530 Pan American Highway, NE  
Albuquerque, New Mexico 87107

May 28, 1991

RECEIVED

MAY 27 1991

OIL CONSERVATION DIVISION

Mr. William J. Lemay, Director  
New Mexico Energy, Minerals and  
Natural Resources Department  
Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

The U.S. Fish and Wildlife Service (Service) has reviewed the Public Notices dated April 24, 1991, regarding the effects of granting State of New Mexico groundwater discharge permits on fish, shellfish, and wildlife resources in New Mexico.

The Service has determined that there are no wetlands or other environmentally sensitive habitats that will be adversely affected by the following activities.

BW-1: Conoco Incorporated, Midland, Texas.

BW-4: Wasserhund Incorporated, Lovington, New Mexico.

The Service has determined that there may be risks to migratory birds from the proposed permitted activities listed below, and that nets or screens be erected over the tanks to prevent any migratory bird species (waterfowl, shorebirds, songbirds, or raptors) from gaining access to the washdown water and used oil. If a migratory bird should be killed by coming in contact with these fluids, a violation of the Migratory Bird Treaty Act will have occurred.

The proposed permittees are:

~~GW-61: Williams Field Services, Salt Lake City, Utah, Horse Canyon~~ Compressor Station.

GW-62: Williams Field Services, Salt Lake City, Utah, Manzanares Compressor Station.

GW-63: Williams Field Services, Salt Lake City, Utah, Pump Mesa Compressor Station.

GW-64: Williams Field Services, Salt Lake City, Utah, Middle Mesa Compressor Station.

GW-77: Meridian Oil, Inc., Farmington, New Mexico, Middle Mesa Compressor Station.

If you have any questions, please call Richard Roy at (505) 883-7877.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Fowler-Propst", with a long horizontal flourish extending to the right.

Jennifer Fowler-Propst  
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico  
Director, New Mexico Energy, Minerals and Natural Resources Department,  
Forestry and Resources Conservation Division, Santa Fe, New Mexico  
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas  
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife  
Enhancement, Albuquerque, New Mexico

AFFIDAVIT OF PUBLICATION

No. 27641

STATE OF NEW MEXICO,  
County of San Juan:

CHRISTINE HILL being duly sworn, says: "That she is the NATIONAL AD MANAGER of The Farmington Daily Times, a daily newspaper of general circulation published in English in Farmington, said county and state, and that the hereto attached LEGAL NOTICE

was published in a regular and entire issue of the said Farmington Daily Times, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for ONE consecutive (days) (///// ) on the same day as follows:

First Publication WEDNESDAY, MAY 1, 1991

Second Publication \_\_\_\_\_

Third Publication \_\_\_\_\_

Fourth Publication \_\_\_\_\_

and that payment therefore in the amount of \$ 74.24 has been made.

*Christine Hill*

Subscribed and sworn to before me this 10th day of MAY, 1991.

*Constance Andrew*

Notary Public, San Juan County,  
New Mexico

My Comm expires: JULY 3, 1993

COPY OF PUBLICATI

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, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone 505-827-5800:

(GW-61)-Williams Field Services, Robert Peacock, Project Manager, P. O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for its proposed Horse Canyon compressor station located in the NE/4 NE 1/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 115 gallons per day of washdown water and used oil will be stored in the above ground steel tank sited within a bermed area prior to transport to a state approved recycling contractor or an OCD approved offsite disposal facility. Groundwater most likely to be affected by any spill, leak or other accidental discharge to the surface is at a depth of approximately 380 feet with a total dissolved solids concentration of approximately 3150 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-62)-Williams Field Services, Robert Peacock, Project Manager, P. O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for its proposed Manzanares compressor station located in the SE/4 SW 1/4, Section 28, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 35 gallons per day of washdown water and used oil will be stored in an above ground steel tank sited within a bermed area prior to transport to a state approved recycling contractor or an OCD approved offsite disposal facility. Groundwater most likely to be affected by any spill, leak or other accidental discharge to the surface is at a depth of approximately 115 feet with a total dissolved solids concentration of approximately 910 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-63)-Williams Field Services, Robert Peacock, Project Manager, P. O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for its proposed Pump Mesa compressor station located in the SE/4 SE/4, Section 14, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 70 gallons per day of washdown water and used oil will be stored in an above ground steel tank sited within a bermed area prior to transport to a state approved recycling contractor or an OCD approved offsite disposal facility. Groundwater most likely to be affected by any spill, leak or other accidental discharge to the surface is at a depth of approximately 938 feet with a total dissolved solids concentration of approximately 9800 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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aged.

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant information.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of April, 1991. To be published on or before May 3, 1991.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
WILLIAM J. LEMAY, Director

SEAL

Legal No. 27641 published in the Farmington Daily Times, Farmington, New Mexico on Wednesday, May 1, 1991.

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

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Any interested person may obtain further information from the Oil Conservation Division and may submit the Director of

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the **Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for ..... 1 ..... times, the first publication being on the ..... 2 ..... day of ..... May ..... 1991, and the subsequent consecutive publications on ..... 1991.

Thomas J. Smithson  
Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this ..... 2 ..... day of ..... May ..... 1991.

PRICE ..... \$51.68 .....

Statement to come at end of month.

CLA-22-A (R-12/91)

ACCOUNT NUMBER ..... C 81184 .....

Bernadette Ortiz

12-18-93

NOTICE OF PUBLICATION

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

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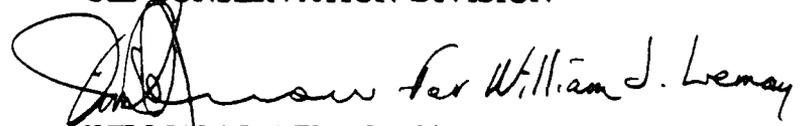
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of April, 1991. To be published on or before May 3, 1991.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
WILLIAM J. LEMAY, Director

S E A L



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

June 6, 1991

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

CERTIFIED MAIL  
RETURN RECEIPT NO. P-327-278-147

Ms. Sandy Fishler  
Williams Field Services  
P. O. Box 58900  
Salt Lake City, Utah 84158-0990

RE: Discharge Plan GW-61  
Horse Canyon Compressor Station  
San Juan County, New Mexico

Dear Ms. Fishler:

The groundwater discharge plan GW-61 for the Williams Field Services Horse Canyon Compressor Station located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM San Juan County, New Mexico is hereby approved. The discharge plan consists of the application dated December 3, 1990 and materials dated January 24, 1991 submitted as supplements to the application.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.A., please note Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

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

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Ms. Sandy Fishler

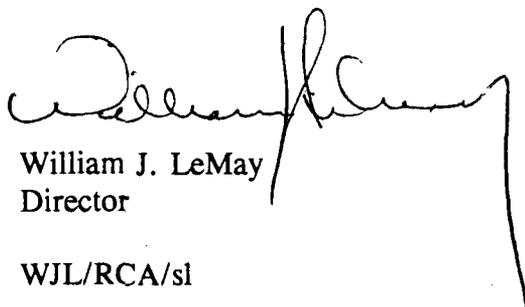
June 6, 1991

Page -2-

Pursuant to Section 3-109.G.4., this plan approval is for a period of five (5) years. This approval will expire June 5, 1996 and you should submit an application for renewal in ample time before that date.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay". The signature is written in a cursive style with a long, vertical tail stroke extending downwards from the end of the name.

William J. LeMay  
Director

WJL/RCA/sl

cc: OCD Aztec Office

**WILLIAMS FIELD SERVICES COMPANY**  
ONE OF THE WILLIAMS COMPANIES

**W** OIL CONSERVATION DIVISION  
RECEIVED

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

'91 APR 12 AM 9 03

April 8, 1991

Mr. Roger Anderson  
NM Oil Conservation Division  
State Land Office Building  
Santa Fe, NM 87504

Re: Horse Canyon C/S Discharge Plan -- JW-61

Dear Mr. Anderson:

We have addressed the items listed in your letter dated March 18, 1991 regarding the Horse Canyon Compressor Station. This written response and the attached Turley topographic map (Exhibit 1) amends the Horse Canyon Discharge Plan.

Response to Item 1 - Oil Leaks Around Compressors

Oil leaks from the compressor engines have been eliminated by reworking piping and proper maintenance.

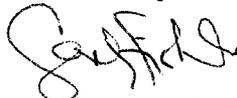
The compressor skid drip containment will be extended along the catwalk adjacent to the oil filter on each compressor unit to contain spillage during maintenance activities. Completion timetable - May 10, 1991.

Response to Item 2 - Spill Containment for Lubricating Oil Daytanks

Spill control measures for tanks on saddle racks consist of a drip pan beneath each tank and piping from the tank vent to the drip pan. Liquids in the drip pan drain via a closed pipe system into the washdown water tank. Completion timetable - May 10, 1991.

Please contact me a (801) 584-6730 if you have any questions or comments regarding this submittal and approval of the discharge plan.

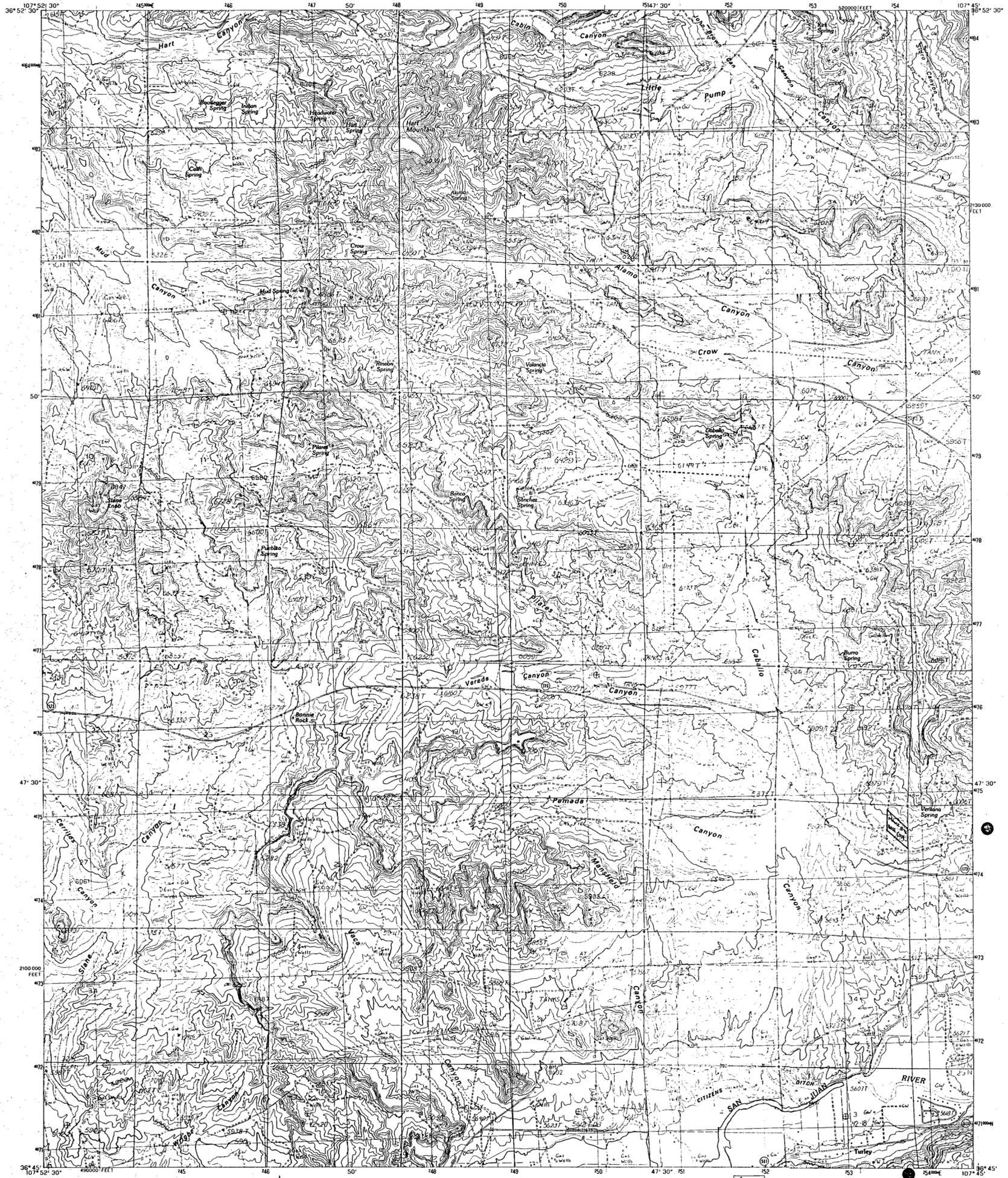
Sincerely,



Sandy Fishler  
Environmental Specialist

cc. Robert Peacock

0059



PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY  
CONTROL BY THE UNITED STATES GEOLOGICAL SURVEY  
COMPILED FROM AERIAL PHOTOGRAPHS TAKEN . . . . .  
FIELD CHECKED . . . . .  
PROJECTION . . . . .  
GRID . . . . .  
UTM GRID DECLINATION . . . . .  
MAGNETIC NORTH DECLINATION . . . . .  
VERTICAL DATUM . . . . .  
HORIZONTAL DATUM . . . . .  
To place on the predicted North American Datum of 1983,  
move the projection lines as shown by dashed corner ticks  
(2 meters north and 55 meters east).  
There may be private inholdings within the boundaries of any  
Federal and State Reservations shown on this map.  
All marginal data and lettering generated and positioned by  
automated type placement procedures.

**PROVISIONAL MAP**  
Produced from original  
manuscript drawings. Informa-  
tion shown as of date of  
field check. 2



QUADRANGLE LOCATION

1	2	3	4	5	6	7	8

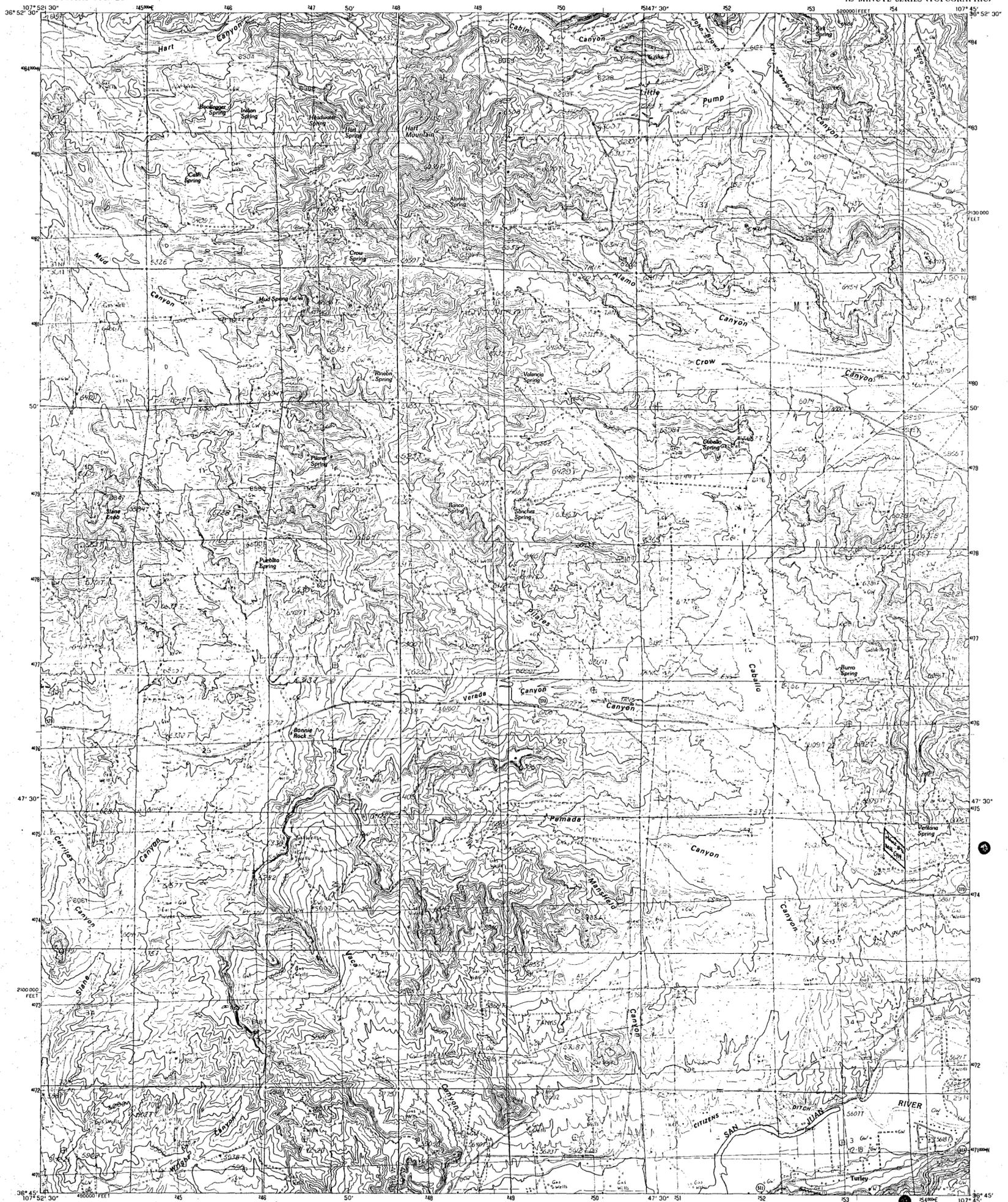
ADJOINING 7.5' QUADRANGLE NAMES

**ROAD LEGEND**

Improved Road . . . . .  
Unimproved Road . . . . .  
Trail . . . . .  
Interstate Route U.S. Route State Route

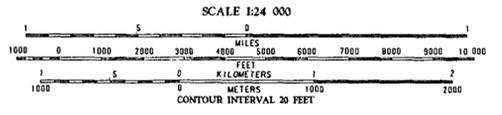
TURLEY, NEW MEXICO  
PROVISIONAL EDITION 1985  
56107-G7-TF-024

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225  
OR RESTON, VIRGINIA 22092.



PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY  
CONTROL BY ..... U.S.G.S. NEW/NOAA  
COMPILED FROM AERIAL PHOTOGRAPHS TAKEN ..... 1962  
FIELD CHECKED BY ..... 1962  
PROJECTION ..... TRANSVERSE MERCATOR  
GRID ..... 600-METER UNIVERSAL TRANSVERSE MERCATOR ..... 30-METER  
1983-1987 STATE GRID TICKS ..... NEW MEXICO WEST ZONE  
UTM GRID DECLINATION ..... 14° WEST  
1983 MAGNETIC NORTH DECLINATION ..... 1° 34' WEST  
VERTICAL DATUM ..... NATIONAL GEODESIC VERTICAL DATUM OF 1985  
HORIZONTAL DATUM ..... 1983 NORTH AMERICAN DATUM  
To place on the projected North American Datum of 1983,  
move the projection lines as shown by dashed corner ticks  
(2 meters north and 55 meters east)  
There may be private inholdings within the boundaries of any  
Federal and State Reservations shown on this map  
All marginal data and lettering generated and positioned by  
automated type placement procedures

**PROVISIONAL MAP**  
Produced from original  
manuscript drawings. Infor-  
mation shown as of date of  
field check. 2



THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225  
OR RESTON, VIRGINIA 22092

QUADRANGLE LOCATION

1	2	3	4	5	6	7	8
Color Hill			Crown Hill			Crown Hill	
Crown Hill			Crown Hill			Crown Hill	
Crown Hill			Crown Hill			Crown Hill	
Crown Hill			Crown Hill			Crown Hill	
Crown Hill			Crown Hill			Crown Hill	
Crown Hill			Crown Hill			Crown Hill	
Crown Hill			Crown Hill			Crown Hill	

ADJOINING 7.5 QUADRANGLE NAMES

**ROAD LEGEND**

Improved Road .....  
Unimproved Road .....  
Trail .....  
Interstate Route .....  
U.S. Route .....  
State Route .....

TURLEY, NEW MEXICO  
PROVISIONAL EDITION 1985  
3607-G7TF-024

## HORSE CANYON COMPRESSOR STATION DISCHARGE PLAN UPDATE

### I. BACKGROUND INFORMATION

On February 21, 1991, Williams Field Services (WFS) submitted a discharge plan for the Horse Canyon Compressor Station to the New Mexico Oil Conservation Division (OCD) for review and approval. The plan covered the discharges associated with the installation of eleven (11) 895 hp skid-mounted, self-contained, natural gas fired lean-burn compressor units, seven (7) skid-mounted, self contained glycol dehydration units, and associated equipment. The plan, GW-61, was subsequently approved by OCD on June 6, 1991.

The terms of the discharge plan approval indicate that Section 3-104 of the New Mexico Water Quality Control Regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." In addition, pursuant to Section 3-107.C, WFS is required to notify the Director of the OCD of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

### II. EXPANSION AT THE HORSE CANYON COMPRESSOR STATION

As indicated below, WFS has modified the Horse Canyon Compressor Station. WFS believes that the modifications which have been or will be implemented have not resulted in an appreciable change in the quantity or quality of process waste fluids generated at the site from that which was specified in the original discharge plan.

#### A. Additional Compression and Dehydration

Since the original discharge plan approval, Williams Field Services has expanded the facility by installing three (3) additional 895 hp skid-mounted, natural gas-fired lean-burn compressor units, two (2) additional glycol dehydration units, and associated equipment. The location of these additional units is shown in Figure 1. These compressors have been installed exactly as the initial units at Horse Canyon, including the placement of all spill and leak prevention devices.

Waste-management data collected by P.O.I., the designated Horse Canyon facility operator, indicate that the installation of these units has not resulted in an increase in the amount of fluids generated at this facility above that mentioned in the February, 1991 discharge plan. In mid-September, 1992, P.O.I. indicated that since startup of the facility in early 1991 only approximately 6,000 gallons of used oil have been hauled from the facility, which is consistent with the terms of the original discharge plan. As the compressor units become older, however, the oil will be changed more frequently and the amount of used oil generated will approach 1750 gallons per quarter, a 375 gallon per quarter increase over the projection of 1375 gallons per quarter contained in the original discharge plan.

With respect to the quantities of condensate and waste water collected, a total of approximately three - 80 barrel loads are transported from the site per month. P.O.I. estimates that the source of the majority of this fluid is the compressor station inlet suction scrubber, which removes fluids present in the inlet gas which have been introduced into the pipeline by production upsets upstream of the Horse Canyon compressor station. Again, the addition of the dehydrators has not contributed to an appreciable increase in the quantity of fluids generated at the facility.

## B. CO<sub>2</sub> Removal Facilities

In addition to the compression and dehydration modification, in mid-October WFS will install two primary and one secondary CO<sub>2</sub> removal membrane units at the Horse Canyon Compressor Station (see Figure 1 for the location of the membrane units within the compressor station). These units are designed to reduce the CO<sub>2</sub> content of the all of the gas flowing through the Horse Canyon compressor station from 10% to 7%. Attachments 1, 2, and 3 present the design of the membrane system.

The membrane units are mounted on decked, sealed skids equipped with steel bottoms and pollution rails to capture any potential leaks and rain water. The primary membrane units, each of which will handle approximately 50% of the gas stream, consist of a pretreat skid containing an inlet filter separator and a guard bed of silica gel. These filters will remove any potential liquid and solid impurities from the gas before it passes through the membrane itself. Once the gas has been pretreated, it will flow through the attached primary membrane unit where the CO<sub>2</sub> concentration in the gas will be reduced from 10% to 7%. The residue gas from both of the primary membranes will be discharged into the station discharge line for ultimate delivery to the Milagro Gas Plant, located in Bloomfield, New Mexico. The permeate from the primary membranes, which contains both CO<sub>2</sub> and methane, will then be re-compressed by an existing compressor and sent through a secondary membrane unit where a secondary separation will occur. The permeate from the secondary membrane will be directed a vent stack and the residual natural gas will be discharged into either the station fuel gas system or the suction line.

Liquid wastes from the pretreat and membrane skids, consisting of rain water and washdown water, will be directed to the existing waste water storage tank. Condensate waste from pretreat unit, primary and secondary membranes, and the line drips will be directed to the existing condensate tank. Since the gas flowing into these units has been dehydrated immediately upstream of the membranes, insignificant quantities of liquids (i.e. estimated at less than 10 gallons per day total) are expected to be generated as a result of the installation of the membrane units. Any solid wastes associated with the operation of the membrane system, i.e., silica gel or the membranes themselves, will be disposed of according to local, state, and federal requirements.

In addition to the membrane system, in late August, 1992 WFS plans to install one more glycol dehydration at this facility. Again, WFS does not

anticipate that the operation of this dehydrator will result in an significant increase in volume of waste water handled at this site.

All wastes from the facility have been and will continue to be disposed of or recycled in accordance with the existing discharge plan.

No new types of liquid wastes have been or will be generated as a result of the recent and planned modifications at the Horse Canyon Compressor Station.

III. SUMMARY

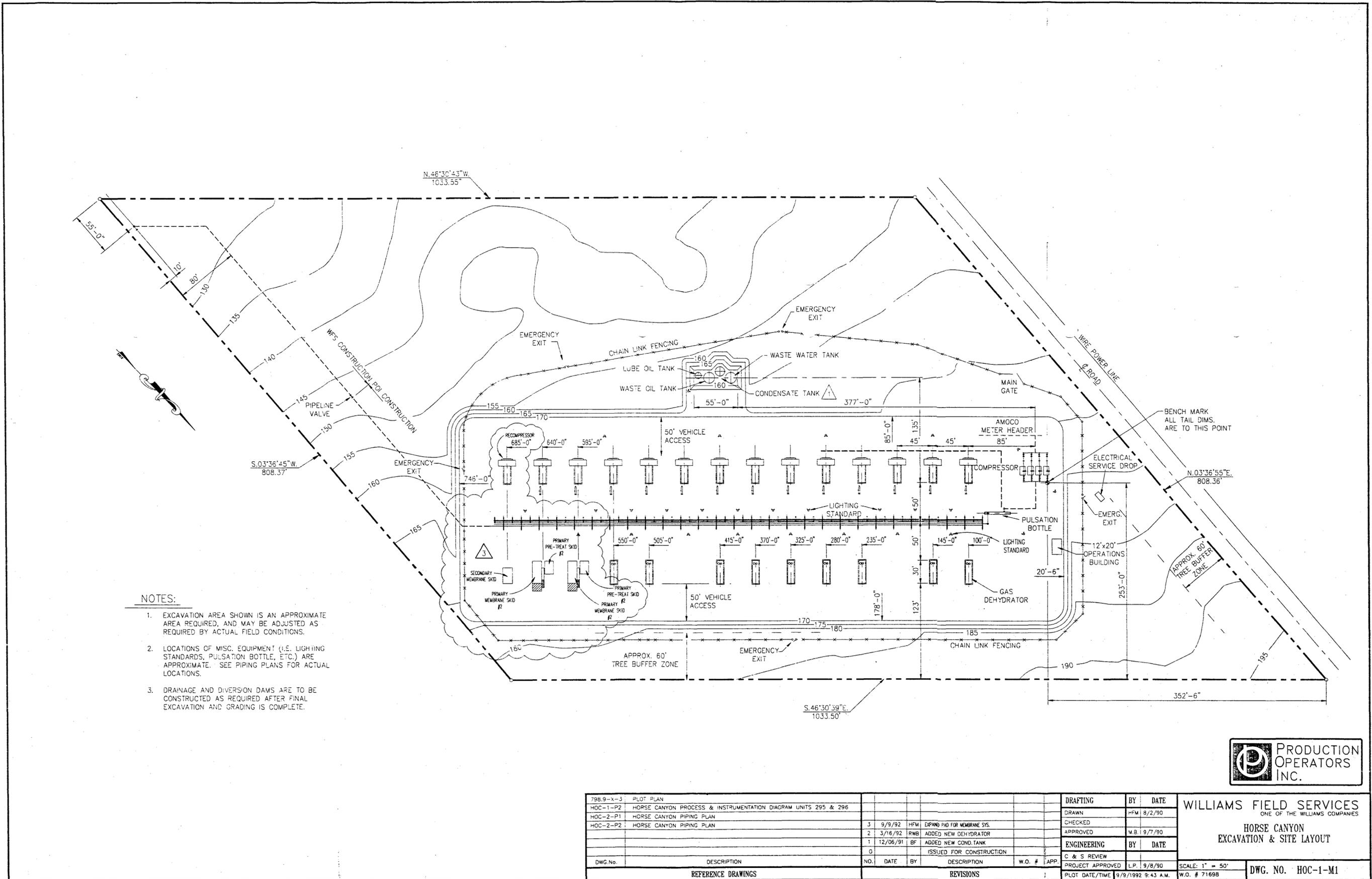
Although modifications have occurred at or are scheduled for the Horse Canyon Compressor Station, WFS believes that these modifications will not result in a significant change in the volume of waste liquids generated at this facility. If the Oil Conservation Division determines that a future increase in the quantity of used oil generated at this facility (i.e. an increase of 375 gallons per quarter) requires a modification to the existing discharge permit, WFS will submit a revision to the existing discharge plan incorporating all of the above mentioned modifications.

P. Von McAllister  
Signature

September 28, 1992  
Date

P. Von McAllister  
Name

Project Manager  
Title



**NOTES:**

1. EXCAVATION AREA SHOWN IS AN APPROXIMATE AREA REQUIRED, AND MAY BE ADJUSTED AS REQUIRED BY ACTUAL FIELD CONDITIONS.
2. LOCATIONS OF MISC. EQUIPMENT (I.E. LIGHTING STANDARDS, PULSATION BOTTLE, ETC.) ARE APPROXIMATE. SEE PIPING PLANS FOR ACTUAL LOCATIONS.
3. DRAINAGE AND DIVERSION DAMS ARE TO BE CONSTRUCTED AS REQUIRED AFTER FINAL EXCAVATION AND GRADING IS COMPLETE.



**WILLIAMS FIELD SERVICES**  
ONE OF THE WILLIAMS COMPANIES

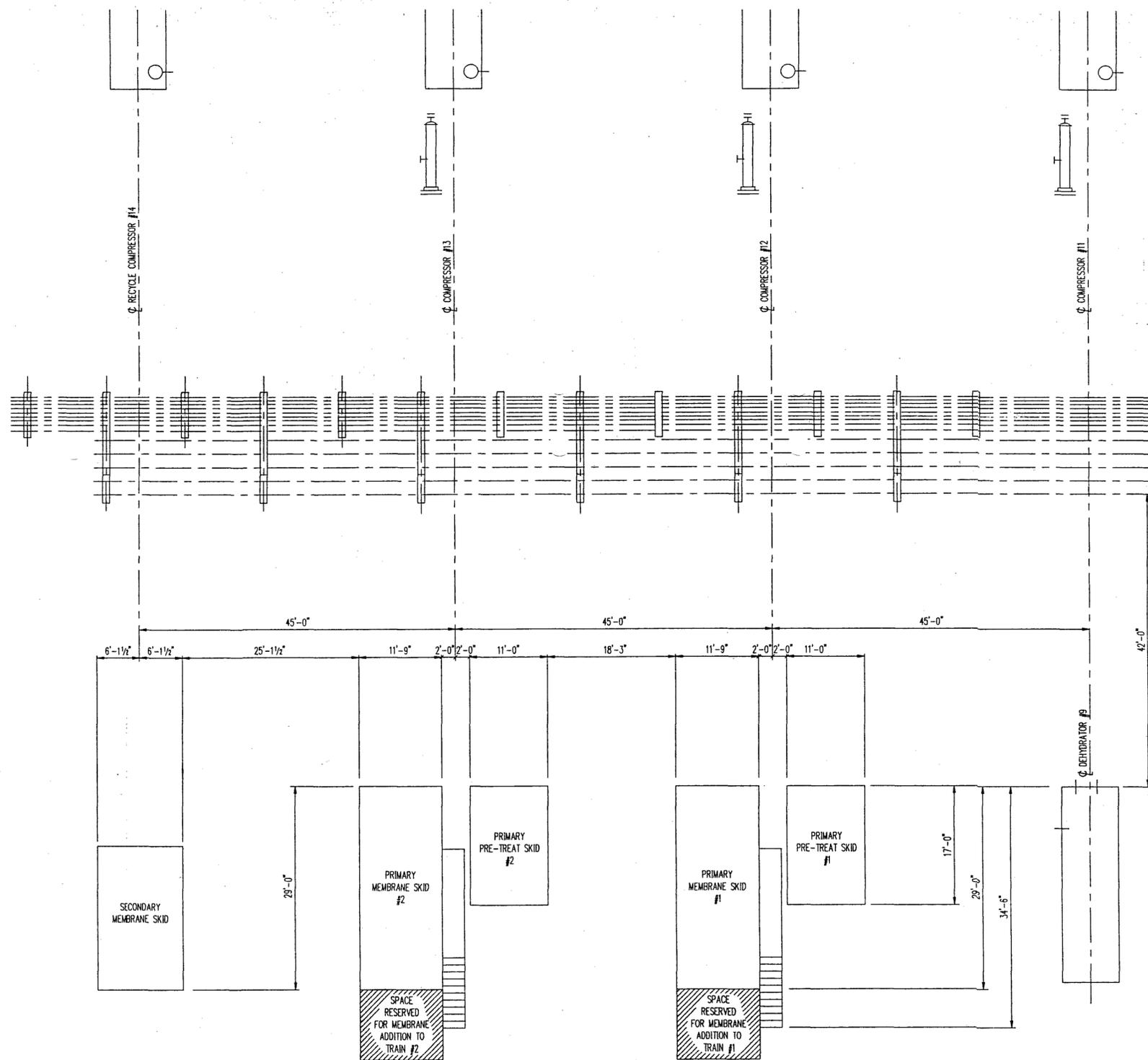
**HORSE CANYON  
EXCAVATION & SITE LAYOUT**

DWG. No.	DESCRIPTION	NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
798.9-x-3	PLOT PLAN						
HOC-1-P2	HORSE CANYON PROCESS & INSTRUMENTATION DIAGRAM UNITS 295 & 296						
HOC-2-P1	HORSE CANYON PIPING PLAN						
HOC-2-P2	HORSE CANYON PIPING PLAN						
		3	9/9/92	HFM	EXPAND PAD FOR MEMBRANE SYS.		
		2	3/16/92	RWB	ADDED NEW DEHYDRATOR		
		1	12/06/91	BF	ADDED NEW COND. TANK		
		0			ISSUED FOR CONSTRUCTION		

DRAFTING	BY	DATE
DRAWN	HFM	8/2/90
CHECKED		
APPROVED	M.B.	9/7/90
ENGINEERING	BY	DATE
C & S REVIEW		
PROJECT APPROVED	L.P.	9/8/90
PLOT DATE/TIME		9/9/1992 9:43 A.M.

SCALE: 1" = 50'  
W.O. # 71698  
DWG. NO. HOC-1-M1

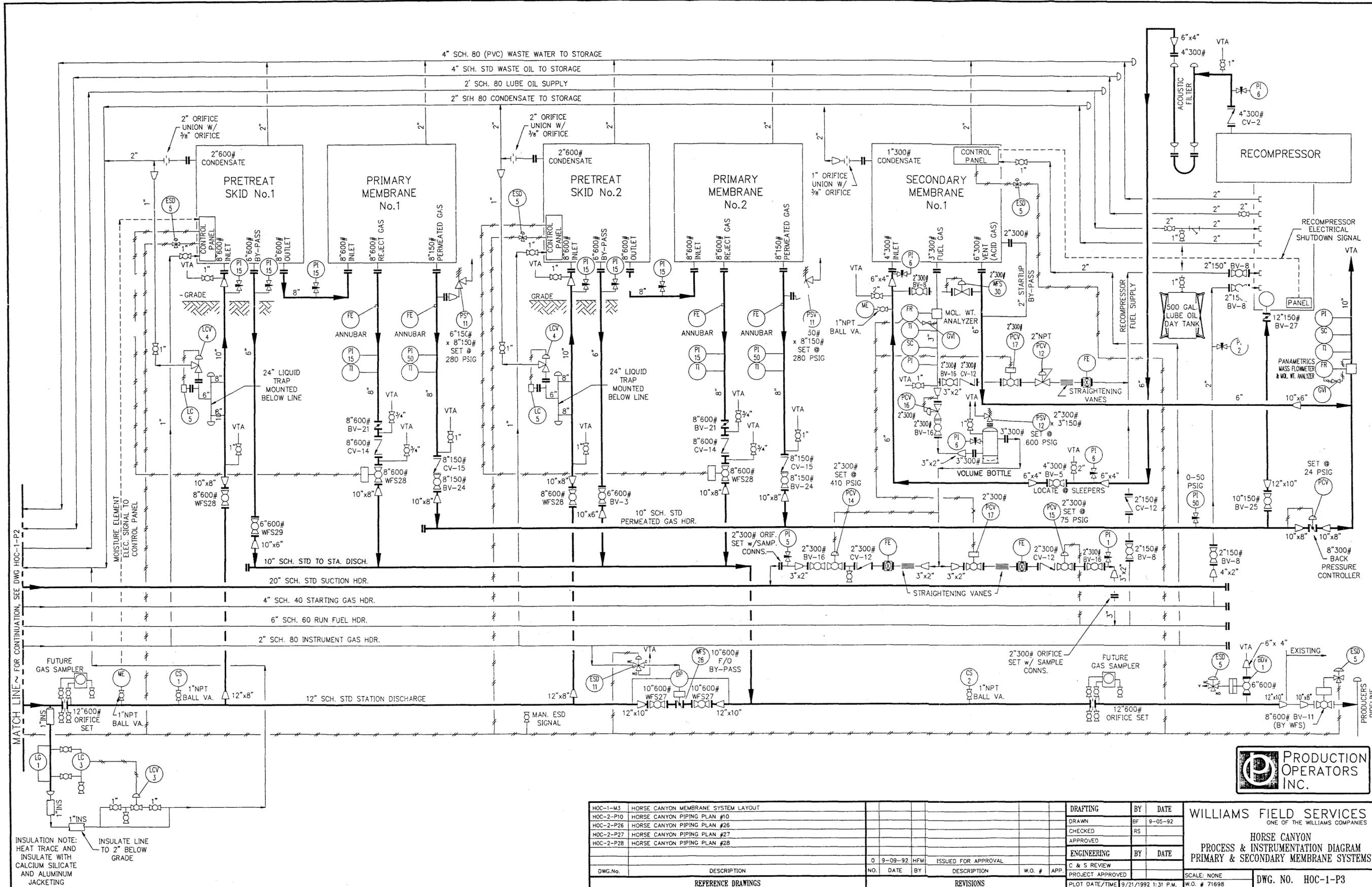
**FIGURE 1**



**WILLIAMS FIELD SERVICES**  
 ONE OF THE WILLIAMS COMPANIES  
**HORSE CANYON**  
 MEMBRANE SYSTEM LAYOUT

DRAFTING		BY	DATE
DRAWN		HFM	9/4/92
CHECKED			
APPROVED			
ENGINEERING		BY	DATE
C & S REVIEW			
PROJECT APPROVED			
PLOT DATE/TIME		9/8/1992 2:37 P.M.	SCALE: 1/8" = 1'-0"
REVISIONS			W.O. # 10015

DWG. NO. HOC-1-M3



MATCH LINE FOR CONTINUATION, SEE DWG HOC-1-P2

INSULATION NOTE:  
HEAT TRACE AND  
INSULATE WITH  
CALCIUM SILICATE  
AND ALUMINUM  
JACKETING

INSULATE LINE  
TO 2" BELOW  
GRADE

DWG.No.	DESCRIPTION	NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
HOC-1-M3	HORSE CANYON MEMBRANE SYSTEM LAYOUT						
HOC-2-P10	HORSE CANYON PIPING PLAN #10						
HOC-2-P26	HORSE CANYON PIPING PLAN #26						
HOC-2-P27	HORSE CANYON PIPING PLAN #27						
HOC-2-P28	HORSE CANYON PIPING PLAN #28						

REFERENCE DRAWINGS

NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
0	9-09-92	HFM	ISSUED FOR APPROVAL		

REVISIONS

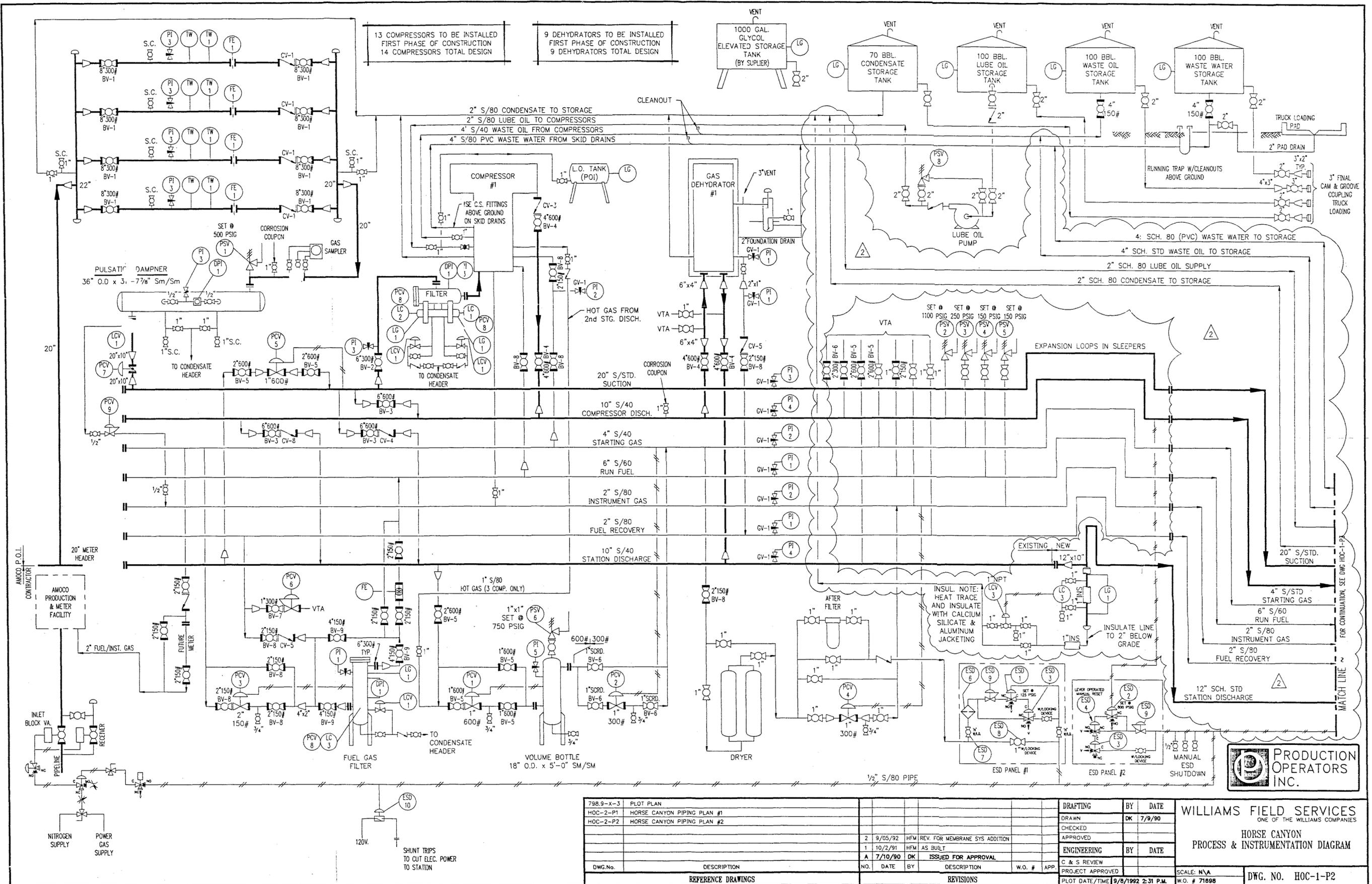
DRAFTING	BY	DATE
DRAWN	BF	9-05-92
CHECKED	RS	
APPROVED		
ENGINEERING	BY	DATE
C & S REVIEW		
PROJECT APPROVED		
PLOT DATE/TIME	9/21/1992 1:31 P.M.	

**WILLIAMS FIELD SERVICES**  
ONE OF THE WILLIAMS COMPANIES

**HORSE CANYON**  
PROCESS & INSTRUMENTATION DIAGRAM  
PRIMARY & SECONDARY MEMBRANE SYSTEMS

SCALE: NONE  
DWG. NO. HOC-1-P3





DWG.No.	DESCRIPTION	NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
798.9-x-3	PLOT PLAN						
HOC-2-P1	HORSE CANYON PIPING PLAN #1						
HOC-2-P2	HORSE CANYON PIPING PLAN #2						

NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
2	9/05/92	HFM	REV. FOR MEMBRANE SYS ADDITION		
1	10/2/91	HFM	AS BUILT		
A	7/10/90	DK	ISSUED FOR APPROVAL		

DRAWING		BY	DATE
DRAWN		DK	7/9/90
CHECKED			
APPROVED			
ENGINEERING		BY	DATE
C & S REVIEW			
PROJECT APPROVED			
PLOT DATE/TIME		9/8/1992 2:31 P.M.	

**WILLIAMS FIELD SERVICES**  
 ONE OF THE WILLIAMS COMPANIES

**HORSE CANYON**  
 PROCESS & INSTRUMENTATION DIAGRAM

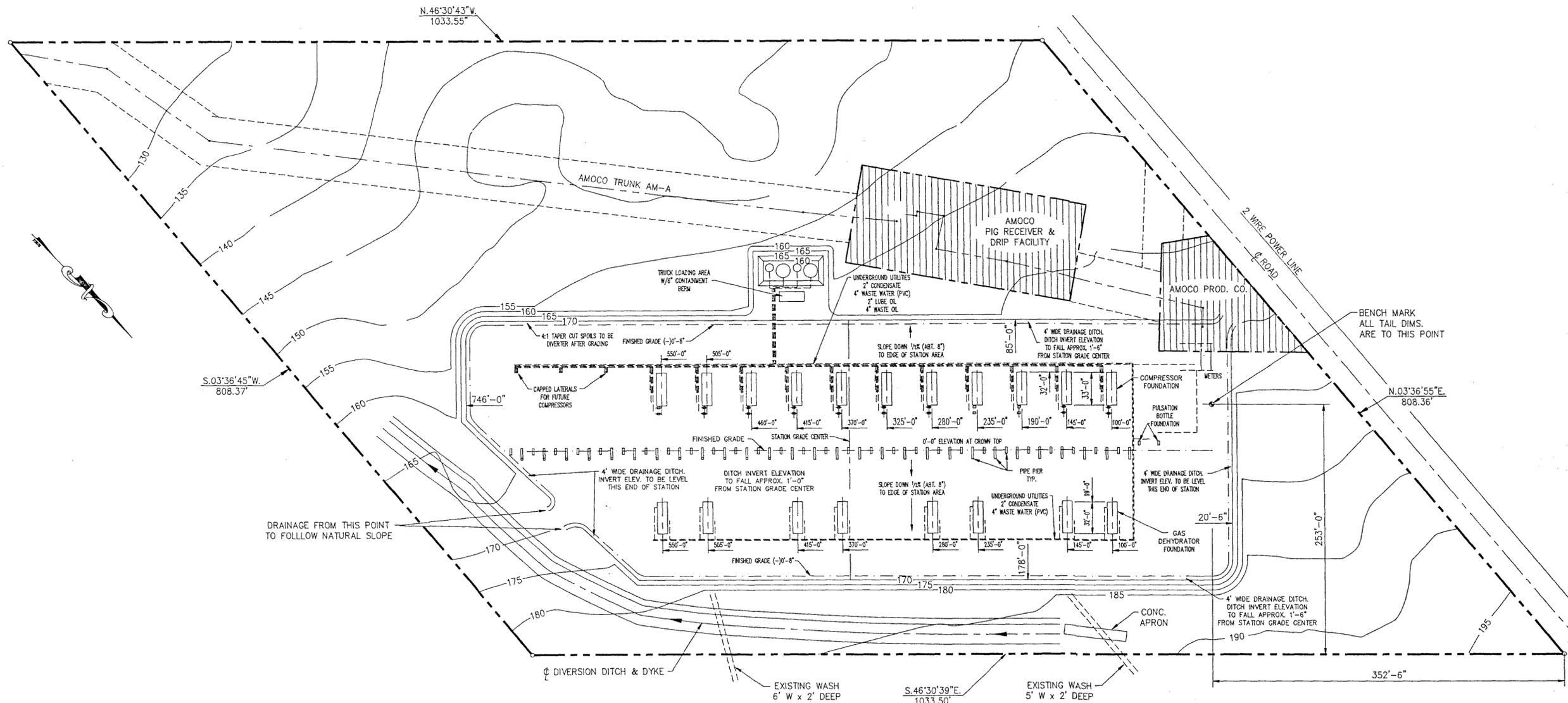
SCALE: N/A  
 W.O. # 71696

DWG. NO. HOC-1-P2



NOTES:

1. FINISH GRADE AT CENTER OF SITE SHALL BE CROWN TOP AT CENTER, AND + OR - 1/2% GRADE AT NORTH AND SOUTH.
2. DITCHES TO BE ADJUSTED BY FIELD TO ACCOMPLISH DRAIN PLAN.
3. STABILIZATION OF SITE TO BE DETERMINED UPON RECOMMENDATIONS OF SOILS REPORT.
4. AFTER CONSTRUCTION ALL ACCESS AREAS TO BE CAPPED WITH GRAVEL.



WILLIAMS FIELD SERVICES  
ONE OF THE WILLIAMS COMPANIES

HORSE CANYON  
O.C.D. DISCHARGE PLAN

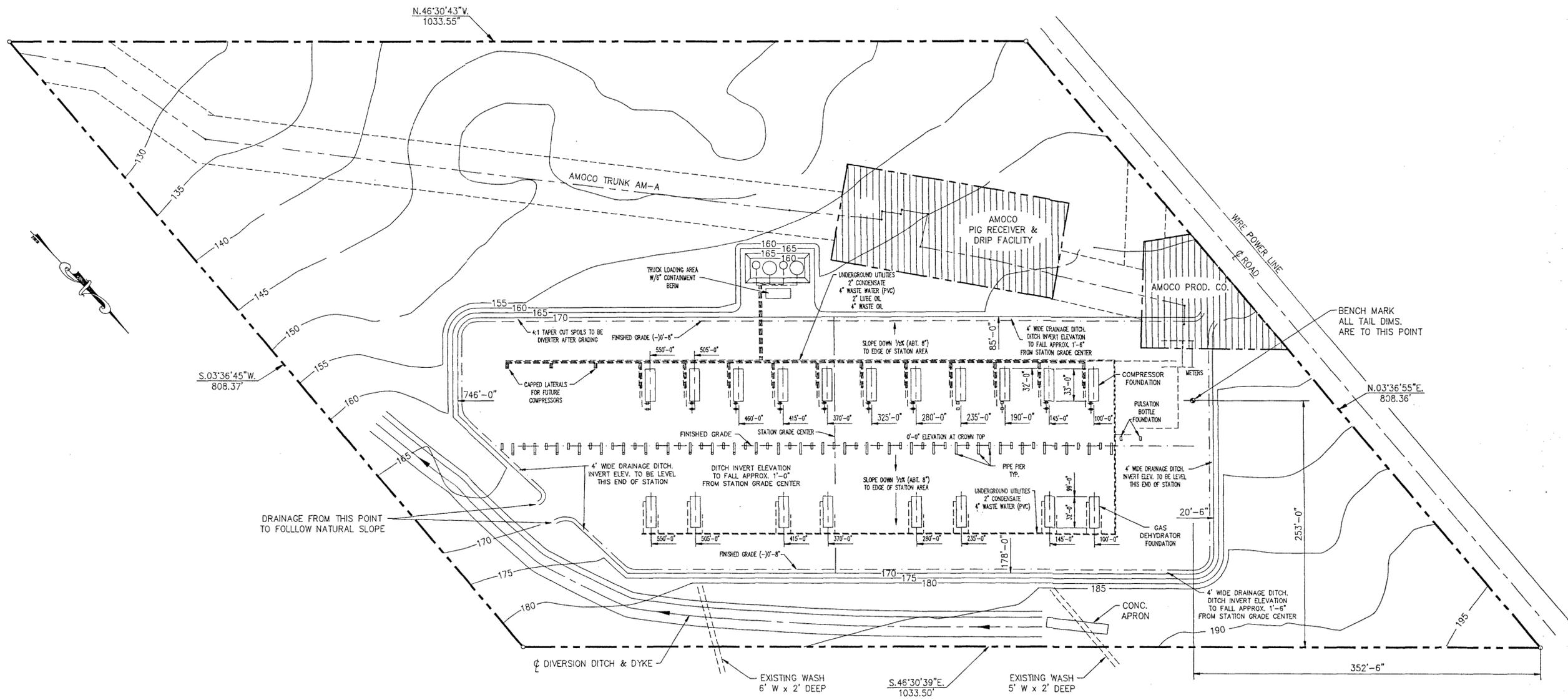
DWG. No.	DESCRIPTION	NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
798.9-X-3	PLOT PLAN						
HOC-1-P2	HORSE CANYON PROCESS & INSTRUMENTATION DIAGRAM UNITS 295 & 296						
HOC-2-P1	HORSE CANYON PIPING PLAN						
HOC-2-P2	HORSE CANYON PIPING PLAN						
REFERENCE DRAWINGS		REVISIONS					

DRAFTING	BY	DATE
DRAWN	HFM	5/23/91
CHECKED		
APPROVED		
ENGINEERING	BY	DATE
C & S REVIEW		
PROJECT APPROVED		
PLOT DATE	HFM	5/23/91

SCALE: 1"=50'  
W.O. # 71698  
DWG. NO. HOC-OCD

**NOTES:**

1. FINISH GRADE AT CENTER OF SITE SHALL BE CROWN TOP AT CENTER, AND + OR - 1/2% GRADE AT NORTH AND SOUTH.
2. DITCHES TO BE ADJUSTED BY FIELD TO ACCOMPLISH DRAIN PLAN.
3. STABILIZATION OF SITE TO BE DETERMINED UPON RECOMMENDATIONS OF SOILS REPORT.
4. AFTER CONSTRUCTION ALL ACCESS AREAS TO BE CAPPED WITH GRAVEL.



**WILLIAMS FIELD SERVICES**  
 ONE OF THE WILLIAMS COMPANIES  
**HORSE CANYON**  
**O.C.D. DISCHARGE PLAN**

DWG.No.	DESCRIPTION	NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
798.9-X-3	PLOT PLAN						
HOC-1-P2	HORSE CANYON PROCESS & INSTRUMENTATION DIAGRAM UNITS 295 & 296						
HOC-2-P1	HORSE CANYON PIPING PLAN						
HOC-2-P2	HORSE CANYON PIPING PLAN						
REFERENCE DRAWINGS		REVISIONS					

DRAFTING	BY	DATE
DRAWN	HFM	5/23/91
CHECKED		
APPROVED		
ENGINEERING	BY	DATE
C & S REVIEW		
PROJECT APPROVED		
PLOT DATE	HFM	5/23/91

SCALE: 1"=50'  
 W.O. # 71698  
 DWG. NO. HOC-OCD

DISCHARGE PLAN  
FOR HORSE CANYON  
COMPRESSOR STATION

Gw-61

Williams Field Services

February 1991

1.0 GENERAL INFORMATION

1.1 Legally Responsible Party

Williams Field Services  
Horse Canyon Compressor Station  
P.O. Box 58900, M.S. 10368  
Salt Lake City, Utah 84158-0900  
(801) 584-6730

Contact Person

Sandy Fishler  
Environmental Specialist  
(801) 584-6730  
Address, Same as Above

1.2 Location of Discharge

The Horse Canyon Compressor Station is located in the NE 1/4, NE 1/4 of Section 27, Township 30 North, Range 9 West, San Juan County, New Mexico. A vicinity map is attached (Turley, New Mexico topographic map) as Exhibit 1. A site plan is provided as Exhibit 2. The compressor station site is approximately 14.72 acres.

1.3 Type of Natural Gas Operation

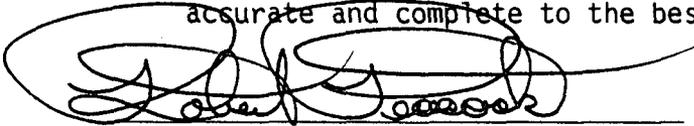
The Horse Canyon Compressor Station will provide metering, compression, and dehydration services to various producers for the gathering of coal seam methane gas (Fruitland Coal Formation) on a contract basis for ultimate delivery through the WFS Milagro Plant (CO<sub>2</sub> removal) near Bloomfield, New Mexico.

Eleven 895 hp (site) skid mounted, self contained, natural gas fired lean-burn compressor units and seven skid mounted, self contained glycol dehydration units are planned for this site.

This facility is classified as a field compressor station; there will be no formal office or other support facilities not essential to field compression.

1.4 Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate and complete to the best of my knowledge and belief.

  
Signature

Robert Peacock  
Name

21 FEBRUARY, 1991  
Date

Project Manager  
Title

2.0 GENERAL PROCESSES

2.1 Process Fluids

The Horse Canyon compressor station began operating on December 23, 1990. Normal operating mode is expected March 1, 1991. Material Safety Data Sheets for glycol and oil used in the equipment are provided in Appendix A. Table 1 lists the sources and planned disposition of liquid wastes with approximations of the quantity and quality type. Once a sufficient amount of representative waste is generated at a typical field compressor station in the region, Williams Field Services will obtain a grab sample for chemical analysis as listed below. The samples will be collected directly at the source. Sampling and analytical techniques will conform with standard methods referenced in WQCC 107.B.

<u>Sample</u>	<u>Parameters</u>
Washdown Wastewater	TDS, pH, BETX, As, Ba, Cd, Cr, Pb, Hg, TOX.
Used Motor Oil	As, Cd, Cr, Pb, TOX, Flash Point

Additional Chemicals listed in WQCC 1-101.44 and 3-103 are not expected to be present in any process fluids or in the coal seam gas transported at the Horse Canyon Compressor Station.

2.2 Spill/Leak Prevention and Housekeeping Procedures

Production Operators, Incorporated has been contracted to operate and maintain the Horse Canyon Compressor Station. The facility will be inspected several times per week at a minimum and a POI operator is also on call 24 hours per day, 7 days per week, 52 weeks per year. The facility is remotely monitored for equipment malfunction. Production Operators must comply with Williams' spill response procedures.

Environmental Protection is a contractual obligation as follows:

POLLUTION/HAZARDOUS WASTE. POI shall take all necessary precautions to control pollution of any kind resulting from POI's operation of the Compression Equipment (Pollution). At POI's sole cost, all hazardous substances, hazardous wastes and oil will be managed to prevent contamination of property and associated surface and groundwater resources.

POI will comply with all applicable spill reporting and recordkeeping requirements of federal, state and local laws and regulations pertaining to hazardous substances, hazardous wastes and oil. POI shall be responsible for all costs related to the cleanup and disposal of contaminated material as well as personal or property damage resulting from such contamination on said property. Hazardous wastes will be properly stored and disposed of in accordance with applicable state and federal laws and regulations.

TABLE 1

Sources and Disposition of  
Process Fluids

<u>Source</u>	<u>Disposition</u>	<u>Quantity</u>	<u>Quality Type</u>	<u>Additives</u>
Compressor Engines	Collected Separately in tank	1,375 gal each quarter	Used Motor Oil	None
Glycol Re-generation	Collected Separately in Evaporation Standpipe	100 gpd	Distilled Water	Triethylene Glycol
Gas Inlet Separator	Collected Separately in Blowdown Tank	trace, available for upsets	High TDS Water	None
Washdown water	Collected separately in tank	Intermittent	Rainwater, tapwater with traces of used motor oil & TEG	Soap

William's corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix B. Significant spills and leaks will be reported to the NMOCD pursuant to Rule 116 using the OCD form (see Appendix B). Spill containment dikes will contain 1 1/3 volume of the largest vessel.

Surface runoff is diverted around the site by the use of drainage ditches on the north and east perimeter (see Exhibit 2). Surface runoff within the site drains by sheet flow to the south and east.

All pressure vessels on site have been tested in accordance with the requirement of the ASME Boiler and Pressure Vessel Code. All interconnecting gas piping on site has been tested in accordance with the requirements of the ASME Code for Pressure Piping, B31.8 Gas Transmission and Distribution Piping Systems.

### 2.3

#### Disposal of Waste Fluids

The disposition of waste fluids is described in Table 1 of section 2.1.

Used motor oil is collected in a closed piping system from each individual unit to a common above ground collection tank and trucked from the site by an EPA registered used oil marketer or recycler.

Distilled water vapor which condenses within the steam line of the glycol regeneration process is collected separately in a standpipe adjacent to each dehydrator. The water is pumped from the standpipe as required and transferred to a tank and trucked from the site to an NMOCD authorized disposal facility.

Wash down wastewater from engine deck plates, will be collected in a closed piping system directly to the wastewater storage tank and disposed of at a commercial facility authorized by the NMOCD.

A gas inlet separator and blow down tank are present at the compressor station in case of an upset to prevent liquid carryover to the compressor engines. Liquids will be stored in an above ground atmospheric tank prior to being hauled off site to a commercial disposal facility authorized by the NMOCD.

Porta pottys present at this facility will be serviced under a contract requiring proper sewage disposal in accordance with applicable laws and regulations.

3.0

### Site Characteristics

The Horse Canyon Compressor Station is located northwest of the central part of the San Juan Basin. The area is characterized by tertiary bedrock hillsides and mesas and Plio-Pleistocene gravel terraces along the San Juan River valley and its major tributaries.

The station is situated on Nacimiento sandstone bedrock at the base of a mesa approximately 1 3/4 miles north of the San Juan River. There is no shallow groundwater present at the Horse Canyon site.

The soil is a clayey sand. Vegetation in the area surrounding the compressor station is juniper forest with approximately 30% cover.

A tributary draining south to the San Juan River is located approximately 1,000 feet south of the plant yard.

Ventana Spring is located approximately 1300 feet northeast of the property boundary. Ventana Spring surfaces at approximately 6120 foot elevation. The Horse Canyon Compressor Station, located at a 6,000 foot elevation is not expected to have any impact on Ventana Spring.

The next closest source of groundwater is located in a 30' deep well in the NW 1/4, SW 1/4 of Section 35, Township 30 North, Range 9 West, at an elevation of 5,620 feet. This is approximately 1 1/3 miles south and downgradient from the station. Groundwater exists in an unconfined sandstone aquifer in the Nacimiento formation and in an unconfined aquifer in alluvium closely associated with the San Juan River. The water level is 5,622 feet. Specific conductance was measured at 4,500 umhos in October, 1974. (USGS 1984 Open-File Report 84-608). Groundwater is used for stock, irrigation, and domestic purposes.

0036

APPENDIX "A"  
MATERIAL SAFETY DATA SHEETS



MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED: 01/12/89

\*\*\*\*\* I. PRODUCT IDENTIFICATION \*\*\*\*\*  
 MOBIL PEGASUS 485

SUPPLIER:	MOBIL OIL CORP.	HEALTH EMERGENCY TELEPHONE:	(212) 883-4411
CHEMICAL NAMES AND SYNONYMS:	PET. HYDROCARBONS AND ADDITIVES	TRANSPORT EMERGENCY TELEPHONE:	(800) 424-9300 (CHEMTREC)
USE OR DESCRIPTION:	INDUSTRIAL LUBRICANT	PRODUCT TECHNICAL INFORMATION:	(800) 662-4525

\*\*\*\*\* II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES \*\*\*\*\*

APPEARANCE: ASTM 5.0 LIQUID      ODOR: MILD      PH: NA  
 VISCOSITY AT 100 F, SUS: 650.0    AT 40 C, CS: 72.0  
 VISCOSITY AT 210 F, SUS: 70.0    AT 100 C, CS: 13.0  
 FLASH POINT F(C): 480(249)    (ASTM D-92)  
 MELTING POINT F(C): NA      POUR POINT F(C): 10(-12)  
 BOILING POINT F(C): > 600(316)  
 RELATIVE DENSITY, 15/4 C: 0.89      SOLUBILITY IN WATER: NEGLIGIBLE  
 VAPOR PRESSURE-MM HG 20C: < .1

NA-NOT APPLICABLE    NE-NOT ESTABLISHED    D-DECOMPOSES  
 FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

\*\*\*\*\* III. INGREDIENTS \*\*\*\*\*

	WT PCT	EXPOSURE LIMITS	SOURCES
	(APPROX)	MG/M3	PPM
			(AND NOTES)
POTENTIALLY HAZARDOUS INGREDIENTS:			
NONE			

OTHER INGREDIENTS:  
 REFINED MINERAL OILS      >90  
 ADDITIVES AND/OR OTHER INGREDIENTS.    <10

SEE SECTION XII FOR COMPONENT REGULATORY INFORMATION.

SOURCES: A-ACGIH-TLV, A\*-SUGGESTED-TLV, M-MOBIL, O-OSHA, S-SUPPLIER  
 NOTE: LIMITS SHOWN FOR GUIDANCE ONLY. FOLLOW APPLICABLE REGULATIONS.

\*\*\*\*\* IV. HEALTH HAZARD DATA \*\*\*\*\*

--- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---  
 EFFECTS OF OVEREXPOSURE: NOT EXPECTED TO BE A PROBLEM.

\*\*\*\*\* V. EMERGENCY AND FIRST AID PROCEDURES \*\*\*\*\*

--- FOR PRIMARY ROUTES OF ENTRY ---  
 EYE CONTACT: FLUSH WITH WATER.  
 SKIN CONTACT: WASH CONTACT AREAS WITH SOAP AND WATER.  
 INHALATION: NOT EXPECTED TO BE A PROBLEM.  
 INGESTION: NOT EXPECTED TO BE A PROBLEM. HOWEVER, IF GREATER THAN 1/2 LITER (PINT) INGESTED, IMMEDIATELY GIVE 1 TO 2 GLASSES OF WATER AND CALL A PHYSICIAN, HOSPITAL EMERGENCY ROOM OR POISON CONTROL CENTER FOR ASSISTANCE. DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

**Mobil**

MOBIL PEGASUS 485

605816

PAGE 2 OF 5

## \*\*\*\*\* VI. FIRE AND EXPLOSION HAZARD DATA \*\*\*\*\*

FLASH POINT F(C): 480(249) (ASTM D-92)

FLAMMABLE LIMITS. LEL: .6 UEL: 7.0

EXTINGUISHING MEDIA: CARBON DIOXIDE, FOAM, DRY CHEMICAL AND WATER FOG.

SPECIAL FIRE FIGHTING PROCEDURES: WATER OR FOAM MAY CAUSE FROTHING.

USE WATER TO KEEP FIRE EXPOSED CONTAINERS COOL. WATER SPRAY MAY BE

USED TO FLUSH SPILLS AWAY FROM EXPOSURE. FOR FIRES IN ENCLOSED

AREAS, FIREFIGHTERS MUST USE SELF-CONTAINED BREATHING APPARATUS.

PREVENT RUNOFF FROM FIRE CONTROL OR DILUTION FROM ENTERING STREAMS

OR DRINKING WATER SUPPLY.

UNUSUAL FIRE AND EXPLOSION HAZARDS: NONE

NFPA HAZARD ID: HEALTH: 0, FLAMMABILITY: 1, REACTIVITY: 0

## \*\*\*\*\* VII. REACTIVITY DATA \*\*\*\*\*

STABILITY (THERMAL, LIGHT, ETC.): STABLE

CONDITIONS TO AVOID: EXTREME HEAT

INCOMPATIBILITY (MATERIALS TO AVOID): STRONG OXIDIZERS

HAZARDOUS DECOMPOSITION PRODUCTS: CARBON MONOXIDE.

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

## \*\*\*\*\* VIII. SPILL OR LEAK PROCEDURE \*\*\*\*\*

ENVIRONMENTAL IMPACT: REPORT SPILLS AS REQUIRED TO APPROPRIATE

AUTHORITIES. U. S. COAST GUARD REGULATIONS REQUIRE IMMEDIATE

REPORTING OF SPILLS THAT COULD REACH ANY WATERWAY INCLUDING

INTERMITTENT DRY CREEKS. REPORT SPILL TO COAST GUARD TOLL FREE

NUMBER 800-424-8802.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: ADSORB ON FIRE RETARDANT

TREATED SAWDUST, DIATOMACEOUS EARTH, ETC. SHOVEL UP AND DISPOSE OF

AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH

CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT

CHARACTERISTICS AT TIME OF DISPOSAL.

WASTE MANAGEMENT: PRODUCT IS SUITABLE FOR BURNING IN AN ENCLOSED,

CONTROLLED BURNER FOR FUEL VALUE OR DISPOSAL BY SUPERVISED

INCINERATION. SUCH BURNING MAY BE LIMITED PURSUANT TO THE RESOURCE

CONSERVATION AND RECOVERY ACT. IN ADDITION, THE PRODUCT IS

SUITABLE FOR PROCESSING BY AN APPROVED RECYCLING FACILITY OR CAN BE

DISPOSED OF AT ANY GOVERNMENT APPROVED WASTE DISPOSAL FACILITY.

USE OF THESE METHODS IS SUBJECT TO USER COMPLIANCE WITH APPLICABLE

LAWS AND REGULATIONS AND CONSIDERATION OF PRODUCT CHARACTERISTICS

AT TIME OF DISPOSAL.

## \*\*\*\*\* IX. SPECIAL PROTECTION INFORMATION \*\*\*\*\*

EYE PROTECTION: NO SPECIAL EQUIPMENT REQUIRED.

SKIN PROTECTION: NO SPECIAL EQUIPMENT REQUIRED. HOWEVER, GOOD PERSONAL

HYGIENE PRACTICES SHOULD ALWAYS BE FOLLOWED.

RESPIRATORY PROTECTION: NO SPECIAL REQUIREMENTS UNDER ORDINARY

CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.

VENTILATION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE

AND WITH ADEQUATE VENTILATION.

## \*\*\*\*\* X. SPECIAL PRECAUTIONS \*\*\*\*\*

NO SPECIAL PRECAUTIONS REQUIRED.

Mobil

MOBIL PEGASUS 485

605816

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\*\*\*\*\* XI. TOXICOLOGICAL DATA \*\*\*\*\*

---ACUTE TOXICOLOGY---

ORAL TOXICITY (RATS): LD50: > 5 G/KG SLIGHTLY TOXIC (ESTIMATED) ---  
 BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

DERMAL TOXICITY (RABBITS): LD50: > 2 G/KG SLIGHTLY TOXIC (ESTIMATED) ---  
 BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

INHALATION TOXICITY (RATS): NOT APPLICABLE ---HARMFUL CONCENTRATIONS OF  
 MISTS AND/OR VAPORS ARE UNLIKELY TO BE ENCOUNTERED THROUGH ANY  
 CUSTOMARY OR REASONABLY FORESEEABLE HANDLING, USE, OR MISUSE OF  
 THIS PRODUCT.

EYE IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. ---BASED ON  
 TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

SKIN IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. ---BASED ON  
 TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

---SUBCHRONIC TOXICOLOGY (SUMMARY)---

SEVERELY SOLVENT REFINED AND SEVERELY HYDROTREATED MINERAL BASE OILS  
 HAVE BEEN TESTED AT MOBIL ENVIRONMENTAL AND HEALTH SCIENCES  
 LABORATORY BY DERMAL APPLICATION TO RATS 5 DAYS/WEEK FOR 90 DAYS AT  
 DOSES SIGNIFICANTLY HIGHER THAN THOSE EXPECTED DURING NORMAL  
 INDUSTRIAL EXPOSURE. EXTENSIVE EVALUATIONS INCLUDING MICROSCOPIC  
 EXAMINATION OF INTERNAL ORGANS AND CLINICAL CHEMISTRY OF BODY  
 FLUIDS, SHOWED NO ADVERSE EFFECTS.

---CHRONIC TOXICOLOGY (SUMMARY)---

THE BASE OILS IN THIS PRODUCT ARE SEVERELY SOLVENT REFINED AND/OR  
 SEVERELY HYDROTREATED. TWO YEAR MOUSE SKIN PAINTING STUDIES OF  
 SIMILAR OILS SHOWED NO EVIDENCE OF CARCINOGENIC EFFECTS.



MOBIL PEGASUS 485

605816

PAGE 4 OF 5

\*\*\*\*\* XII. REGULATORY INFORMATION \*\*\*\*\*  
GOVERNMENTAL INVENTORY STATUS: ALL COMPONENTS REGISTERED IN ACCORDANCE WITH TSCA.

D.O.T. SHIPPING NAME: NOT APPLICABLE

D.O.T. HAZARD CLASS: NOT APPLICABLE

US OSHA HAZARD COMMUNICATION STANDARD: PRODUCT ASSESSED IN ACCORDANCE WITH OSHA 29 CFR 1910.1200 AND DETERMINED NOT TO BE HAZARDOUS.

RCRA INFORMATION: THE UNUSED PRODUCT, IN OUR OPINION, IS NOT SPECIFICALLY LISTED BY THE EPA AS A HAZARDOUS WASTE (40 CFR, PART 261D); DOES NOT EXHIBIT THE HAZARDOUS CHARACTERISTICS OF IGNITABILITY, CORROSIVITY, OR REACTIVITY, AND IS NOT FORMULATED WITH THE METALS CITED IN THE EP TOXICITY TEST. HOWEVER, USED PRODUCT MAY BE REGULATED.

U.S. SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA) TITLE III: THIS PRODUCT CONTAINS NO "EXTREMELY HAZARDOUS SUBSTANCES".

SARA (302) REPORTABLE HAZARD CATEGORIES: NONE

THIS PRODUCT CONTAINS NO CHEMICALS REPORTABLE UNDER SARA (313) TOXIC RELEASE PROGRAM.

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS BELOW:

CHEMICAL NAME	CAS NUMBER	LIST CITATIONS
*** NO REPORTABLE INGREDIENTS ***		

--- KEY TO LIST CITATIONS ---

- |               |              |                |              |              |
|---------------|--------------|----------------|--------------|--------------|
| 1 - OSHA Z,   | 2 - ACGIH,   | 3 - IARC,      | 4 - NTP,     | 5 - NCI,     |
| 6 - EPA CARC, | 7 - NFPA 49, | 8 - NFPA 325M, | 9 - DOT HMT, | 10 - CA RTK, |
| 11 - IL RTK,  | 12 - MA RTK, | 13 - MN RTK,   | 14 - NJ RTK, | 15 - MI 293, |
| 16 - FL RTK,  | 17 - PA RTK, | 18 - CA P65.   |              |              |

--- NTP, IARC, AND OSHA INCLUDE CARCINOGENIC LISTINGS ---

NOTE: MOBIL PRODUCTS ARE NOT FORMULATED TO CONTAIN PCBs.

\*\*\*\*\*  
INFORMATION GIVEN HEREIN IS OFFERED IN GOOD FAITH AS ACCURATE, BUT WITHOUT GUARANTEE. CONDITIONS OF USE AND SUITABILITY OF THE PRODUCT FOR PARTICULAR USES ARE BEYOND OUR CONTROL; ALL RISKS OF USE OF THE PRODUCT ARE THEREFORE ASSUMED BY THE USER AND WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. NOTHING IS INTENDED AS A RECOMMENDATION FOR USES WHICH INFRINGE VALID PATENTS OR AS EXTENDING LICENSE UNDER VALID PATENTS. APPROPRIATE WARNINGS AND SAFE HANDLING PROCEDURES SHOULD BE PROVIDED TO HANDLERS AND USERS.  
\*\*\*\*\*

\*\*\*\*\*  
PREPARED BY: MOBIL OIL CORPORATION  
ENVIRONMENTAL AFFAIRS AND TOXICOLOGY DEPARTMENT, PRINCETON, NJ  
FOR FURTHER INFORMATION, CONTACT:  
MOBIL OIL CORPORATION, PRODUCT FORMULATION AND QUALITY CONTROL  
3225 GALLOWES ROAD, FAIRFAX, VA 22037 (703) 849-3265  
\*\*\*\*\*

**Mobil**

MOBIL PEGASUS 485

605816

PAGE 5 OF 5

\*\*\*\*\* APPENDIX \*\*\*\*\*

FOR MOBIL USE ONLY: (FILL NO: RN1022D1001) MCN: , MHC: 1\* 1\* NA 0\*

0\*, MPPEC: , PPEC: , US83-002 APPROVE 08/23/83



72-62-7820-01

**MATERIAL SAFETY  
DATA SHEET**

**ETHYLENE GLYCOL**

**SECTION V-HEALTH HAZARD DATA (CONTINUED)**

**IF IN EYES:** FLUSH WITH LARGE AMOUNTS OF WATER, LIFTING UPPER AND LOWER LIDS OCCASIONALLY, GET MEDICAL ATTENTION.

**IF SWALLOWED:** IMMEDIATELY DRINK TWO GLASSES OF WATER AND INDUCE VOMITING BY STIMULATING THE PHARYNX WITH YOUR FINGER AT BACK OF THROAT. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. GET MEDICAL ATTENTION IMMEDIATELY.

**IF BREATHED:** IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED, GIVE ARTIFICIAL RESPIRATION. KEEP PERSON WARM, QUIET, AND GET MEDICAL ATTENTION.

**PRIMARY ROUTE(S) OF ENTRY:**

INHALATION  
INGESTION

**SECTION VI-REACTIVITY DATA**

**HAZARDOUS POLYMERIZATION:** CANNOT OCCUR

**STABILITY:** STABLE

**INCOMPATIBILITY:** AVOID CONTACT WITH, STRONG OXIDIZING AGENTS.

**SECTION VII-SPILL OR LEAK PROCEDURES**

**STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:**

**SMALL SPILL:** ABSORB LIQUID ON PAPER, VERMICULITE, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND TRANSFER TO HOOD.

**LARGE SPILL:** ELIMINATE ALL IGNITION SOURCES (FLARES, FLAMES, INCLUDING WILD FIRES), ELIMINATE ALL ELECTRICAL SPARKS FOR ZONES NOT WEARING PROTECTIVE EQUIPMENT STOP SPILL AT SOURCE, DIKE AREA OF SPILL UNTIL CLEAN-UP HAS BEEN COMPLETED. TO SALVAGE TANK, REMAINING LIQUID MAY BE TAKEN UP ON SAND, CLAY, EARTH, FLOOR ABSORBENT OR OTHER ABSORBENT MATERIAL AND SHOVELLED INTO CONTAINERS.

**WASTE DISPOSAL METHOD:**

**SMALL SPILL:** ALLOW VOLATILE PORTION TO EVAPORATE IN HOOD. ALLOW SUFFICIENT TIME FOR VAPORS TO COMPLETELY CLEAR HOOD DUCT WORK. DISPOSE OF REMAINING MATERIAL IN ACCORDANCE WITH APPLICABLE REGULATIONS.

**LARGE SPILL:** DESTROY BY LIQUID INCINERATION IN ACCORDANCE WITH APPLICABLE REGULATIONS.

**SECTION VIII-PROTECTIVE EQUIPMENT TO BE USED**

**RESPIRATORY PROTECTION:** IF TLV OF THE PRODUCT OR ANY COMPONENT IS EXCEEDED, A NEIGHBORHOOD JOINTLY APPROVED AIR SUPPLIED RESPIRATOR IS ADVISED IN ABSENCE OF PROPER ENVIRONMENTAL CONTROL. OSHA REGULATIONS ALSO PERMIT OTHER EQUIPMENT SUPPLIERS). ENGINEERING OR ADMINISTRATIVE CONTROLS SHOULD BE IMPLEMENTED TO REDUCE EXPOSURE.

**VENTILATION:** PROVIDE SUFFICIENT MECHANICAL (GENERAL AND/OR LOCAL EXHAUST) VENTILATION TO MAINTAIN EXPOSURE BELOW TLV(S).

**PROTECTIVE GLOVES:** WEAR RESISTANT GLOVES SUCH AS, NITRILE RUBBER

**EYE PROTECTION:** CHEMICAL SPLASH GOGGLES IN COMPLIANCE WITH OSHA REGULATIONS ARE ADVISED; HOWEVER, OSHA REGULATIONS ALSO PERMIT OTHER TYPE SAFETY GLASSES. (CONSULT YOUR SAFETY EQUIPMENT SUPPLIER)

**OTHER PROTECTIVE EQUIPMENT:** TO PREVENT REPEATED OR PROLONGED SKIN CONTACT, WEAR IMPERVIOUS CLOTHING AND BOOTS.

**SECTION IX-SPECIAL PRECAUTIONS OR OTHER COMMENTS**

CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPTIED, SINCE EMPTIED CONTAINERS RETAIN PRODUCT RESIDUES (VAPOR, LIQUID, AND/OR SOLID), ALL HAZARD PRECAUTIONS GIVEN IN THIS DATASHEET MUST BE OBSERVED.

ETHYLENE GLYCOL HAS BEEN SHOWN TO PRODUCE DOSE-RELATED TERATOGENIC EFFECTS IN RATS AND MICE WHEN GIVEN BY GAVAGE OR IN DRINKING WATER AT HIGH CONCENTRATIONS. WHILE THERE IS NO CURRENTLY AVAILABLE INFORMATION TO SUGGEST THAT ETHYLENE GLYCOL SHOULD BE SEXUALLY DEFECTIVE IN HUMANS IT IS RECOMMENDED THAT EVERY EFFORT BE MADE TO PREVENT THE INGESTION OF ANY ETHYLENE GLYCOL AND TO KEEP PERSONNEL EXPOSURE BELOW THE ACGIH TLV.

OVEREXPOSURE TO COMPONENTS HAS APPARENTLY BEEN FOUND TO CAUSE THE FOLLOWING EFFECTS IN LABORATORY ANIMALS; KIDNEY DAMAGE

OVEREXPOSURE TO COMPONENTS HAS BEEN SUGGESTED AS A CAUSE OF THE FOLLOWING EFFECTS IN HUMANS; TUBERCULOSIS

**APPENDIX "B"**  
**SPILL CONTROL PROCEDURES**

Manual		
Policy and Procedure		
Section	Tab	Document No
Operating & Maint.	10	12.10.020
Effective Date	Issue No	Page No
JUL 07 1989	5	1 Of 10

Subject or Title  
DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES: Preventing, Controlling and Reporting of

**A. PURPOSE AND SCOPE**

- \*A.1 To establish the policy and procedure for preventing, controlling, and reporting of spills or discharges of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
- \*A.2 The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the Area Manager.

**B. CONTENTS**

**C. POLICY**

- C.1 General
- C.2 Bulk Storage Tanks
- C.3 Facility Drainage
- C.4 Transfer Operations, Pumping, and In-Plant Process
- C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack

**D. PROCEDURE**

- D.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of a Hazardous or Toxic Substance
- D.2 Submitting Written Notification of a Discharge or Spill

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials  
 ATTACHMENT B: Contractors Available for Discharge or Spill Containment  
 ATTACHMENT C: Agencies Requiring Notification

**C. POLICY**

**C.1 GENERAL**

- \*C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.
- \*\*C.1.2 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
  - a. Section 101 (N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA);
  - b. Section 307(a) and Section 311 (b)(2)(A) of the Clean Water Act;
  - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress);
  - d. Section 112 of the Clean Air Act;
  - e. Section 7 of the Toxic Substance Control Act;

\*Revised  
 \*\*Added

Supersedes Division Policy and Procedure 12.10.020 dated October 10, 1985

Approval (Page 1 Only) *[Signature]* Approval (Page 1 Only) *[Signature]* Approval (Page 1 Only) *[Signature]*

Manual Policy and Procedure		
Section Operating & Maint.	Tab 10	Document No 12.10.020
Effective Date JUL 07 1989	Issue No 5	Page No 2 of 10

Subject or Title

DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

The term hazardous substance does not include petroleum, including crude oil or any fraction thereof, which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

- \*\*C.1.3 Oil, for the purpose of this document, means oil of any kind or in any form, including but not limited to petroleum, fuel oil, Y grade, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) are not considered to be oil.
- \*C.1.4 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the required federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- \*C.1.5 Facilities which are subject to the requirements stated in this policy are as follows:
  - a. Non-Transportation Related Facilities
    - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
    - (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
  - b. Transportation Related Facilities
    - (1) All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.
- \*\*C.1.6 Each Northwest Pipeline location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan will also identify all hazardous substance storage vessels at the facility and the spill prevention measures in place to control discharges or spills.
- C.1.7 The District Superintendent is responsible for spill prevention. These duties include, but are not limited to, the following:
  - a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
  - b. Conducting briefings for operating personnel in sufficient intervals to assure adequate understanding of the Spill Plan at that facility. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.
- \*C.1.8 Each individual facility should be inspected, at least annually, by the District Superintendent or designee to determine the potential for discharges or spills of oil or hazardous substances. These inspection reports must be retained for three years. All facilities which have the potential for discharging or spilling oil or hazardous substances into a watercourse are required to have the following preventive measures:

\*Revised  
\*\*Added

Supersedes Division Policy and Procedure 12.10.020 dated October 10, 1985

Approval (Page 1 Only)

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Approval (Page 1 Only)



Manual		
Policy and Procedure		
Section	Tab	Document No
Operating & Maint.	10	12.10.020
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Subject or Title

**DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of**

- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.
- b. All tank batteries should, as far as practical, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
- c. A careful monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes regular inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.

C.1.9 Any field drainage ditches, road ditches, traps, suaps, or skimmers should be inspected at regularly scheduled intervals for accumulation of liquid hydrocarbons or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

\*C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the material stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.

\*\*C.2.2 The District Superintendent should evaluate level monitoring requirements to prevent tank overflow.

\*C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.

\*C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

C.3 FACILITY DRAINAGE

C.3.1 Provisions should be made for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from dike areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual design.

\*C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.

\*C.3.3 When possible, plant drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any plant drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.

\*C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the

\*Revised  
\*\*Added

Supersedes Division Policy and Procedure 12.10.020 dated October 10, 1985

Approval (Page 1 Only)	Approval (Page 1 Only)	Approval (Page 1 Only)
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STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

March 18, 1991

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

CERTIFIED MAIL  
RETURN RECEIPT NO. P-327-278-107

Ms. Sandy Fishler  
Environmental Specialist  
Williams Field Services  
P. O. Box 58900  
Salt Lake City, Utah 84158-0990

RE: Authorization to Discharge

Dear Ms. Fishler:

The Oil Conservation Division (OCD) has received your requests dated March 12, 1991 for authorization to discharge for 120 days without an approved discharge plan for the following five (5) new compressor stations:

1. Horse Canyon - NE/4 NE/4, Section 27, Township 30 North, Range 9 West, San Juan County, New Mexico
2. Manzanares - NE/4 NW/4, Section 33, Township 30 North, Range 8 West, San Juan County, New Mexico
3. Pump Mesa - SW/4 SE/4, Section 14, Township 31 North, Range 8 West, San Juan County, New Mexico
4. Middle Mesa - SE/4 SW/4, Section 10, Township 31 North, Range 7 West, San Juan County, New Mexico
5. Simms Mesa - NW/4 NE/4, Section 22, Township 30 North, Range 7 West, San Juan County, New Mexico

This authorization will allow start-up, testing and operation of the stations while the discharge plan applications are being reviewed.

Ms. Sandy Fishler  
March 18, 1991  
Page -2-

Pursuant to Water Quality Control Commission (WQCC) Regulations 3-106.B. and for good cause shown, you are hereby authorized to discharge at the five compressor stations listed above without an approved discharge plan for a period not to exceed 120 day commencing on the start-up date of each station. Notify this office of the actual dates of start-up.

During the 120 day period, processing of the discharge plan application will continue. Since the 120 day period can not be extended, timely submittal of any OCD-requested information will ensure that permitting is concluded prior to the expiration date.

If you have any questions, please contact David Boyer at (505) 827-5812 or Roger Anderson at (505) 827-5884.

Sincerely,

A handwritten signature in cursive script that reads "William J. LeMay". The signature is written in dark ink and is positioned above the typed name and title.

William J. LeMay  
Director

WJL/RCA/sl

cc: OCD Aztec Office



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

March 18, 1991

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

CERTIFIED MAIL  
RETURN RECEIPT NO. P-327-278-101

Ms. Sandy Fishler  
Williams Field Services  
P. O. Box 58900  
Salt Lake City, Utah 84158-0990

RE: Discharge Plan GW-61, Horse Canyon Compressor Station  
San Juan County, New Mexico

Dear Ms. Fishler:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the discharge plan application for the above referenced facility. The following comments and/or requests for additional information and commitments are based on review of the application and observations made during the March 5, 1991 OCD site inspection.

1. Oil was leaking on the ground from the compressors. Submit a plan with a completion timetable for the containment or elimination of these leaks.
2. Each compressor had a lube oil saddle tank ("daytank") adjacent to the compressor pad, but were not on the pad. Submit a timetable for installation of pad and curb type containment for these tanks.

Submission of the above requested information will allow review of your application to continue.

If you have any questions, please contact me at (505) 827-5884.

Sincerely,

Roger C. Anderson  
Environmental Engineer

RCA/sl

cc: OCD Aztec Office

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

March 12, 1991

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
Santa Fe, NM 87504

RE: Middle Mesa Compressor Station JW-64

Dear Mr. Anderson:

Williams Field Services requests authorization to operate the Middle Mesa Compressor Station while the New Mexico Oil Conservation Division is reviewing the Discharge Plan. The discharge plan is currently under development. There are two (2) dehydrators temporarily in place at the site. These should be in service by April 1, 1991. The permanent installation may be in service some time around August 1, 1991.

Please do not hesitate to contact me at (801) 584-6730 if there are any questions or concerns with this request.

Sincerely,



Sandy Fishler  
Environmental Specialist

SF/pm

0054

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

March 12, 1991

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
Santa Fe, NM 87504

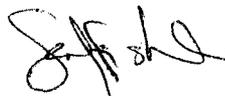
RE: Pump Mesa Compressor Station JW-63

Dear Mr. Anderson:

Williams Field Services requests authorization to operate the Pump Mesa Compressor Station while the New Mexico Oil Conservation Division is reviewing the Discharge Plan. The discharge plan is currently under development. There are two (2) dehydrators temporarily in place at the site. These should be in service by April 1, 1991. The permanent installation may be in service some time around June 1, 1991.

Please do not hesitate to contact me at (801) 584-6730 if there are any questions or concerns with this request.

Sincerely,



Sandy Fishler  
Environmental Specialist

SF/pm

0054

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

March 12, 1991

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
Santa Fe, NM 87504

RE: Manzanares Compressor Station JW-62

Dear Mr. Anderson:

Williams Field Services requests authorization to continue operating the Manzanares Compressor Station while the New Mexico Oil Conservation Division is reviewing the Discharge Plan. The discharge plan is currently under development. The start-up date and initial delivery from this station was January 15, 1991; however, the normal operating mode is contingent upon the start-up and operation of Milagro Plant, currently forecast for March 15, 1991.

Please do not hesitate to contact me at (801) 584-6730 if there are any questions or concerns with this request.

Sincerely,



Sandy Fishler  
Environmental Specialist

SF/pm

0054

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

March 12, 1991

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
Santa Fe, NM 87504

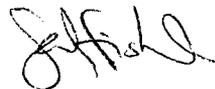
RE: Horse Canyon Compressor Station JW-61

Dear Mr. Anderson:

Williams Field Services requests authorization to continue operating the Horse Canyon Compressor Station while the New Mexico Oil Conservation Division is reviewing the Discharge Plan. The discharge plan was submitted on February 21, 1991. The start-up date and initial delivery from this station was December 23, 1990; however, the normal operating mode is contingent upon the start-up and operation of Milagro Plant, currently forecast for March 15, 1991.

Please do not hesitate to contact me at (801) 584-6730 if there are any questions or concerns with this request.

Sincerely,



Sandy Fishler  
Environmental Specialist

SF/pm

0054

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

March 12, 1991

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
Santa Fe, NM 87504

RE: Simms Mesa Compressor Station JW-68

Dear Mr. Anderson:

Williams Field Services requests authorization to continue operating the Simms Mesa Compressor Station while the New Mexico Oil Conservation Division is reviewing the Discharge Plan. The discharge plan is currently under development. There are four (4) dehydrators on permanent foundations at the site. The start-up date and initial delivery from this station was February 18, 1991; however, the date for normal operating mode which will include compression, is indefinite.

Please do not hesitate to contact me at (801) 584-6730 if there are any questions or concerns with this request.

Sincerely,



Sandy Fishler  
Environmental Specialist

SF/pm

0054

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

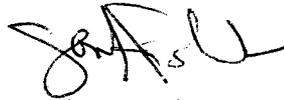
February 21, 1991

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, NM 87501

Dear Mr. Anderson:

Three (3) copies of a discharge plan for the Horse Canyon compressor station are hereby submitted. Please do not hesitate to contact me at (801) 584-6730 if you have any questions or comments regarding this submittal.

Sincerely,



Sandy Fishler  
Environmental Specialist

SF/slh



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

GARREY CARRUTHERS  
GOVERNOR

POST OFFICE BOX 208B  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

November 20, 1990

CERTIFIED MAIL -  
RETURN RECEIPT NO. P-327-278-306

Ms. Sandy Fisher  
Williams Field Services Company  
P. O. Box 58900  
Salt Lake City, Utah 84158-0900

RE: Discharge Plan Requirement

Dear Ms. Fisher:

Under the provisions of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of discharge plans is required for the following compressor stations:

1. Horse Canyon  
NE/4 NE/4, Section 27, Township 30 North, Range 9 West  
San Juan County, New Mexico
2. Manzanares  
NE/4 NW/4, Section 33, Township 30 North, Range 8 West  
San Juan County, New Mexico
3. Pump Mesa  
SW/4 SE/4, Section 14, Township 31 North, Range 8 West  
San Juan County, New Mexico
4. Middle Mesa  
SE/4 SW/4, Section 10, Township 31 North, Range 7 West  
San Juan County, New Mexico
5. Simms Mesa  
NW/4 NE/4, Section 22, Township 30 North, Range 7 West  
Rio Arriba County, New Mexico

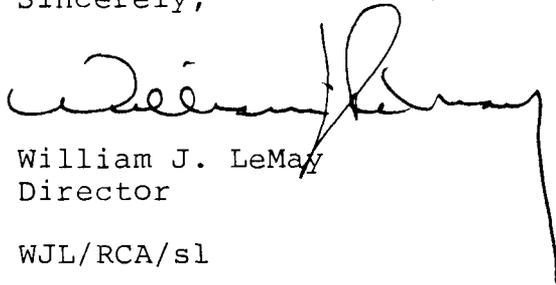
Ms. Sandy Fisher  
November 20, 1990  
Page -2-

This notification of discharge plan requirement is pursuant to Sections 3-104 and 3-106 of the WQCC Regulations. The discharge plan, defined in Section 1.101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in buried underground tanks and/or piping).

A copy of the regulations is enclosed for your convenience. Also enclosed is a copy of an OCD guide to the preparation of discharge plans for gas processing plants. The guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Three copies of each discharge plan application should be submitted.

If there are any questions on this matter, please feel free to call David Boyer at 827-5812, or Roger Anderson at 827-5884 as they have the assigned responsibility for review of all discharge plans.

Sincerely,



William J. LeMay  
Director

WJL/RCA/sl

Enclosure

cc: OCD Aztec District Office

**WILLIAMS FIELD SERVICES COMPANY**  
ONE OF THE WILLIAMS COMPANIES 

**RECEIVED**

P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800

AUG 31 1990

OIL CONSERVATION DIV.  
SANTA FE

August 28, 1990

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
P.O. Box 2088  
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

Notification is hereby provided, upon your request, of our intent to construct five (5) new field compressor sites in the San Juan Basin. Facilities at each site will consist of skid mounted 1000 hp field compressors, a field dehydrator and 3-70 barrel (or smaller) storage tanks (for lube oil, wastewater and used oil). The location of each site is provided below:

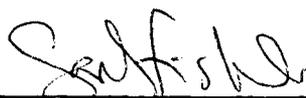
Horse Canyon (11 units)	NE 1/4, NE 1/4, Sec. 27, T-30-N, R-9-W
Manzanares (4 units)	NE 1/4, NW 1/4, Sec. 33, T-30-N, R-8-W
Pump Mesa (6 units)	SW 1/4, SE 1/4, Sec. 14, T-31-N, R-8-W
Middle Mesa (7 units)	SE 1/4, SW 1/4, Sec. 10, T-31-N, R-7-W
Simms Mesa (7 units)	NW 1/4, NE 1/4, Sec. 22, T-30-N, R-7-W

Wastewater and used oil will be collected directly into a tank. Spill containment dikes will surround all tanks.

There will be no discharge from these field compressor sites, therefore a discharge plan should not be required. We will begin the earthwork at these locations on September 3, 1990 and the compressor units must be in operation by November 23, 1990 due to contractual obligations.

I will contact you before September 14, 1990 to verify your concurrence with our interpretation that discharge plans are not required. If you need additional information or can respond to this notification in the meantime, please do not hesitate to contact me at (801) 584-6730.

Sincerely,



Sandy Fishler  
Environmental Services

SF/pm

0008

**WILLIAMS FIELD SERVICES COMPANY**  
 ONE OF THE WILLIAMS COMPANIES 

**RECEIVED**

P.O. BOX 58900  
 SALT LAKE CITY, UTAH 84158-0900  
 801-583-8800

AUG 31 1990

OIL CONSERVATION DIV.  
 SANTA FE

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Mr. Roger Anderson  
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Map B-31	Horse Canyon (11 units)	NE 1/4, NE 1/4, Sec. 27, T-30-N, R-9-W	
B-32	Manzanares * (4 units)	NE 1/4, NW 1/4, Sec. 33, T-30-N, R-8-W	2 miles N of Turkey Hwy 173
B-3	Pump Mesa * (6 units)	SW 1/4, SE 1/4, Sec. 14, T-31-N, R-8-W	2 miles S. of SPR. above spring
B-4	Middle Mesa (7 units)	SE 1/4, SW 1/4, Sec. 10, T-31-N, R-7-W	
B-25	Simms Mesa * (7 units)	NW 1/4, NE 1/4, Sec. 22, T-30-N, R-7-W	1/4 mile above Navajo Lake

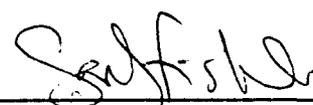
Wastewater and used oil will be collected directly into a tank. Spill containment dikes will surround all tanks.

There will be no discharge from these field compressor sites, therefore a discharge plan should not be required. We will begin the earthwork at these locations on September 3, 1990 and the compressor units must be in operation by November 23, 1990 due to contractual obligations.

I will contact you before September 14, 1990 to verify your concurrence with our interpretation that discharge plans are not required. If you need additional information or can respond to this notification in the meantime, please do not hesitate to contact me at (801) 584-6730.

\* Desinite need for D.P. - Close to Groundwater (spring) adjacent to Navajo Lake

Sincerely,



Sandy Fishler  
 Environmental Services

SF/pm

0008

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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

potential of reaching a watercourse. The construction of dikes must meet the following requirements:

- a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation, or displacement by foreign materials.
- b. Small dikes for temporary containment should be constructed at valves where leaking of oil or hazardous substances develops.
- c. Any dike three feet or higher should have a minimum cross section of two feet at the top.

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

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

C.4 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESS

- \*C.4.1 Aboveground valves and pipelines should be examined regularly by operating personnel to determine whether there are significant leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks, and metal surfaces.

C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

- C.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a tank car or truck loaded or unloaded in the plant.
- \*C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- \*C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any tank car or truck should be closely examined for leakage prior to filling and departure. All drains and outlets which may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

D. PROCEDURE

- \*D.1 IDENTIFYING, CONTAINING AND INITIAL REPORTING OF A DISCHARGE OR SPILL OF OIL OR HAZARDOUS SUBSTANCE

Any Employee

- \*D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity initiates immediate containment procedures and notifies District Superintendent.

NOTE: Refer to Attachment A for containment procedures.

\*Revised  
\*\*Added

Supersedes Division Policy and Procedure 12.10.020 dated October 10, 1985

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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

District Superintendent

- D.1.2      Contacts Gas Dispatch and Area Manager immediately by telephone and provides the following information:
- a.          Name of company facility and/or location of facility and nature of discharge or spill
  - b.          Description and quantity of substance discharged
  - c.          Name, title, and telephone number of person initially reporting the discharge or spill and person reporting to Gas Dispatch
  - d.          Action taken or being taken to mitigate and correct discharge or spill
  - e.          Water bodies or streams involved
  - f.          Time and duration of discharge or spill
  - g.          Outside involvement during discharge or spill (public government agencies, etc.)

Gas Dispatch Personnel

- \*D.1.3      Advises the responsible Area Manager and Environmental Services departments immediately by telephone concerning the incident including any incidents reported by persons not employed with the Company.

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

- \*D.1.4      If Environmental Services cannot be contacted, notifies Barry Swartz, Director, Transmission Services.

Area Manager

- D.1.5      Coordinates containment and clean-up of discharge or spill with the District Superintendent.
- D.1.6      If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. See Attachment B.
- D.1.7      Advises Environmental Services by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

Environmental Services

- \*\*D.1.8      Contacts Legal Department (and Right-of-Way Department, if appropriate) and assesses reporting requirements to state and federal agencies.
- \*\*D.1.9      Makes appropriate contacts with U.S. Coast Guard and state agencies when necessary.
- \*\*D.1.10     If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

\*Revised  
\*\*Added

Supercedes Division Policy and Procedure 12.10.020 dated October 10, 1985

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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

District Superintendent

D.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:

- a. Time and date of discharge or spill
- b. Facility name and/or spill location
- c. Type of material spilled
- d. Quantity of material spilled
- e. Area affected
- f. Cause of spill
- g. Special circumstances
- h. Corrective measures taken
- i. Description of repairs made
- j. Preventative measures taken to prevent recurrence.

D.2.2 Forwards the completed report to Environmental Services and a copy to Legal departments. Retains a copy for future reference.

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

\*Revised  
\*\*Added

Supersedes Division Policy and Procedure 12.10.020 dated October 10, 1985

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ATTACHMENT A

Discharge or Spill Containment Procedures and Materials

Type of Facility where the Discharge or Spill occurs	Containment Procedures	Material Used for Containment
A. Oil Pipeline (as defined in C.1.3)	<ol style="list-style-type: none"> <li>1. Closes appropriate block valves.</li> <li>2. Contains discharge or spill by: ditching covering, applying sorbents, constructing</li> <li>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</li> </ol>	<ol style="list-style-type: none"> <li>1. Straw</li> <li>2. Loose Earth</li> <li>3. Oil Sorbent - 3M Brand</li> <li>4. Plain Wood Chips</li> <li>5. Sorb - Oil Chips - Banta Co.</li> <li>6. Sorb - Oil Swabs - Banta, Co.</li> </ol>
B. Vehicle	<ol style="list-style-type: none"> <li>1. Contains discharge or spill by: ditching covering surface with dirt, constructing earthen dams, applying sorbents, or burning.</li> <li>2. Notifies immediately the Compliance and Safety Department and if there is any imminent danger to local residents notifies immediately the highway patrol or local police officials.</li> <li>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</li> </ol> <p><b>**NOTE:</b> Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.</p>	<ol style="list-style-type: none"> <li>7. Sorb - Oil Mats - Banta Co.</li> </ol>
C. Bulk Storage Tanks or any other Facilities	<ol style="list-style-type: none"> <li>1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning.</li> <li>2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</li> </ol>	

\*Revised  
\*\*Added

Supersedes Division Policy and Procedure 12.10.020 dated October 10, 1985

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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES: Preventing, Controlling and Reporting of

ATTACHMENT B

\*Contractors Available for Discharge or Spill Containment

COLORADO		
Contractor Name	Address	Telephone Number
G. R. Spencer Contractors	2200 East 114th Avenue, Suite 209 Thornton, CO 80233	303-484-2616
Ecology and Environment, Inc. (Mike Peceny)	1776 South Jackson Street Denver, CO 80210	303-757-4984
John Bunning Transfer	2473 Commerce Blvd. Grand Junction, CO 80505	303-245-5631
Smith Welding and Construction Company, Inc.	P.O. Box 1834 880 25 Road Grand Junction, CO 81502	303-242-4306
Western Engineers, Inc.	2150 U.S. 6 and 50 Grand Junction, CO 81505	303 242-5202
W. C. Streigel, Inc.	P.O. Box 860 17030 State Hwy 64 Rangely, CO 81648	303-675-8444 303-675-8749

IDAHO		
Contractor Name	Address	Telephone Number
Envirosafe Services of Idaho	1602 West Franklin Boise, Idaho	208-384-1500

NEW MEXICO		
Contractor Name	Address	Telephone Number
Four-Four (Burney Strunk)	P.O. Box 821 Farmington, NM 87401	505-327-6041 505-632-2680 (eves.)
Four-Way Co., Inc.	4816 East Main Farmington, NM 87401	505-327-0401
P & A Construction	Bloomfield, NM	505-632-8061
Rosenbaum Construction	Box 2308 Aztec Highway Farmington, NM 87401	505-325-6367

OREGON		
Contractor Name	Address	Telephone Number
Pegasus Waste Management	30250 S.W. Parkway Avenue Wilsonville, OR 97070	503-682-5802
Riedel Environmental Services, Inc. Portland, OR 97203	Foor of M. Portsouts Emergency: 800-334-0004	503-286-4656

Available for all NWP  
locations)

\*Revised  
\*\*Added

Supersedes Division Policy and Procedure 12.10.020 dated October 10, 1985

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ATTACHMENT C

Agencies Requiring Notification

State of Colorado  
 Water Quality Control Division . . . . (business hours) . . . . 1-303-331-4570  
 . . . . (night) . . . . . 1-303-370-9395

State of Idaho  
 State Emergency Services Division . . . . . 1-800-632-8000  
 Emergency and Poison Control Center (Outside Idaho) . . . . . 1-208-334-2241

State of New Mexico  
 Department of Environmental Improvement . . . . . 1-505-827-9329

State of Oregon  
 Emergency Services Division . . . . . 1-800-452-0311  
 (Outside Oregon). . . . . 1-503-378-4124

State of Utah  
 Environmental Health - Emergency Response (24 hour). . . . . 1-801-538-6333

State of Washington  
 Department of Ecology . . . . . (24 hour). . . . . 1-206-753-2353

State of Wyoming  
 Water Quality Div. - Dept. of Environmental Quality . (24 hour) . 1-307-777-7781

United States Coast Guard . . . . . 1-800-424-8802

**\*\*NOTE:** If a spill or discharge is the result of a vehicular accident the Highway Patrol or local police officials should be immediately notified. If imminent danger to local residents exists, state and/or local agencies; and available Company personnel should be used to notify the residents immediately.

\*Revised  
 \*\*Added

Supersedes Division Policy and Procedure 12.10.020 dated October 10, 1985

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ATTACHMENT B (Continued)

## Contractors Available for Discharge or Spill Containment

UTAH		
Contractor Name	Address	Telephone Number
A. L. Berna Construction	P.O. Box 8 Moab, UT 84532	801-259-5361
JBCO	Wagner Subdivision Moab, UT 84532	801-259-5316 801-259-8952
North American Environmental, Inc. (PCB Cleanup Work)	P.O. Box 1181 Bldg. G-9, Freeport Center Clearfield, UT 84016	801-776-0878
Ted Miller Company	3809 South 300 West Salt Lake City, UT 84115	801-268-1093

WASHINGTON		
Contractor Name	Address	Telephone Number
CES ChemPro, Inc.	3400 East Marginal Ways Seattle, WA 98134	206-682-4849 Emergency Phone Number
North American Environmental, Inc.	2432 East 11th Street Tacoma, WA 98421	206-272-9988
Northwest Enviroservice	P.O. Box 24443 Seattle, WA	206-622-1090
Oil Spill Service, Inc.	P.O. Box 548 Kirkland, WA 98033	206-823-6500

WYOMING		
Contractor Name	Address	Telephone Number
Eiden Construction & Roustabout Service	Marbleton, WY	307-276-3413
Flint Engineering and Const. Co. (Mike Kovern)	Box 807 Evanston, WY 82930	307-789-9396
Martin's Roustabout	Big Piney, WY (Martin Douglas)	307-276-3625 or 307-276-3626
Persh's Water Service	Big Piney, WY (Persh Puntaney)	307-276-3210
Skyline Construction	Big Piney, WY (Rod Bennett)	307-276-3383

\*Revised  
\*\*Added

Supercedes Division Policy and Procedure 12.10.020 dated October 10, 1985

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## RULE 116

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

The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

"Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipeline through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

1. Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)
2. "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels or crude oil or condensate, or 100 barrels or more of salt water, none of which reached a watercourse or enters a stream or lake, breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

3. "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.
4. Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipeline breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipeline breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.
5. Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.
6. Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.

IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in duplicate to the appropriate district office of the Division within ten days after discovery of the incident.

SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

State of New Mexico  
Energy and Minerals Department

OIL CONSERVATION DIVISION  
P.O. Box 2088  
Santa Fe, New Mexico 87504

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

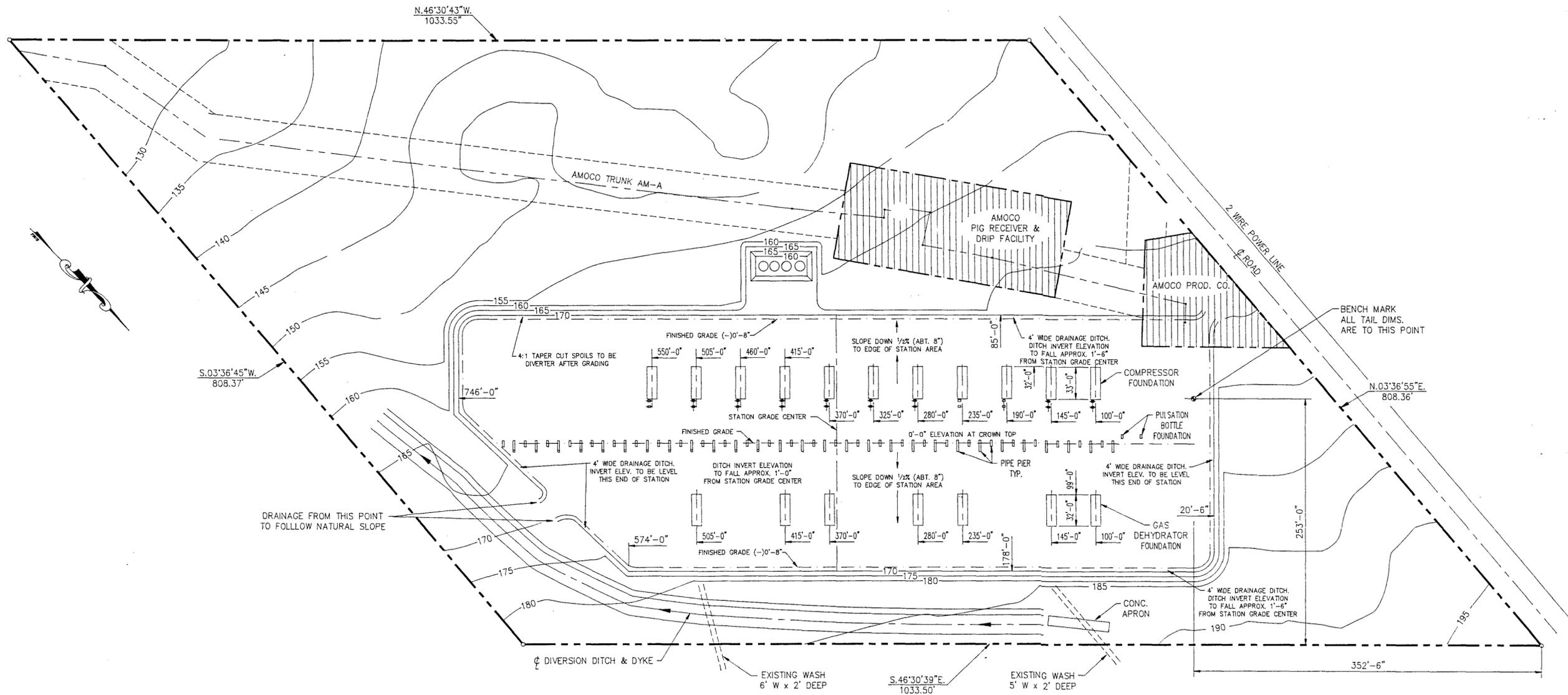
Name of Operator				Address				
Report of	Fire	Break	Spill	Leak	Blowout	Other*		
Type of Facility	Drig Well	Prod Well	Tank Btty	Pipe Line	Gaso Pint	Oil Rfy	Other*	
Name of Facility								
Location of Facility (Quarter/Quarter Section or Footage Description)					Sec.	Twp.	Rge.	County
Distance and Direction From Nearest Town or Prominent Landmark								
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				
Type of Fluid Lost				Quantity of Loss	_____ BO _____ BW	Volume Recovered	_____ BO _____ BW	
Did Any Fluids Reach a Watercourse?	Yes	No	Quantity					
If Yes, Describe Fully**								
Describe Cause of Problem and Remedial Action Taken**								
Describe Area Affected and Cleanup Action Taken**								
Description of Area	Farming	Grazing	Urban	Other*				
Surface Conditions	Sandy	Sandy Loam	Clay	Rocky	Wet	Dry	Snow	
Describe General Conditions Prevailing (Temperature, Precipitation, Etc.)**								
I Hereby Certify That the Information Above is True and Complete to the Best of My Knowledge and Belief								
Signed		Title			Date			

\*Specify

\*\*Attach Additional Sheets if Necessary

**NOTES:**

1. FINISH GRADE AT CENTER OF SITE SHALL BE CROWN TOP AT CENTER, AND + OR - 1/2% GRADE AT NORTH AND SOUTH.
2. DITCHES TO BE ADJUSTED BY FIELD TO ACCOMPLISH DRAIN PLAN.
3. STABILIZATION OF SITE TO BE DETERMINED UPON RECOMMENDATIONS OF SOILS REPORT.
4. AFTER CONSTRUCTION ALL ACCESS AREAS TO BE CAPPED WITH GRAVEL.



**WILLIAMS FIELD SERVICES**  
ONE OF THE WILLIAMS COMPANIES

**HORSE CANYON  
SITE GRADING PLAN**

798.9-X-3	PLOT PLAN				
HOC-1-P2	HORSE CANYON PROCESS & INSTRUMENTATION DIAGRAM UNITS 295 & 296				
HOC-2-P1	HORSE CANYON PIPING PLAN				
HOC-2-P2	HORSE CANYON PIPING PLAN				
		1	2/18/91	HFM	ADDED SURVEY DATA
		A			ISSUED FOR APPROVAL
DWG.No.	DESCRIPTION	NO.	DATE	BY	DESCRIPTION
	REFERENCE DRAWINGS				REVISIONS

DRAFTING	BY	DATE
DRAWN	HFM	9/14/90
CHECKED		
APPROVED		
ENGINEERING	BY	DATE
C & S REVIEW		
PROJECT APPROVED		
PLOT DATE	HFM	2/19/91

SCALE: 1"=50'

W.O. # 71698

DWG. NO. HOC-1-M2