

GW - 87

**INSPECTIONS &
DATA**



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

July 11, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-594-835-277

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

RE: Discharge Plan Inspections
GW-61, GW-62, GW-63, GW-64 and GW-87
San Juan County, New Mexico

Dear Ms. Gooding:

The New Mexico Oil Conservation Division (OCD) on June 4, 1996 along with Williams Field Service Operator Mr. Frank Chacon inspected the Horse Canyon (GW-61), Manzanares (GW-62), Pump Mesa (GW-63), Middle Mesa (GW-64), and Cedar Hill (GW-87) compressor stations. The inspections purpose was to determine compliance with the previously approved OCD discharge plan renewals for the facilities. The information that follows will address the concerns of the OCD at the above mentioned facilities.

Note: For WFS information the OCD has enclosed duplicate copies of all photos taken during the inspections.

1. GW-61 or Horse Canyon Compressor Station, (Inspected 06/04/96)

A. The overall house keeping and pollution prevention in place at the site appears to be in compliance with OCD discharge permit GW-061. However, it should be noted that many of the lube oil saddle tanks at the site did not have pad and curb type containment under them - **WFS within 30 days of receipt of this letter will propose a time line to the OCD for coming into compliance with this item.**

B. Waste issues - it appears that painting does occur at the facility as paint products were found to be in storage at the site - **WFS shall within 30 days of receipt of this inspection report determine how the paint waste is disposed/recycled and provide the OCD with an answer.**

C. Solvents - WFS shall not commingle solvent wastes with other wastes that are non-hazardous in terms of RCRA unless WFS can prove by characteristic testing or process knowledge (i.e. MSDS) that the solvent is non-hazardous. **WFS will address this issue within 30 days of receipt of this inspection report to the OCD.**

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(D.) WFS needs to make certain that only RCRA Subtitle C Exempt wastes are being disposed of at Class II UIC disposal well facilities - and other wastes that do not meet the criteria of the exemption are not injected into class II UIC disposal wells.

2. GW-62 or Manzanares Compressor Station, (Inspected 06/04/96)

A. The overall house keeping and pollution prevention in place at the site appears to be in compliance with OCD discharge permit GW-062. However, it should be noted that many of the lube oil saddle tanks at the site did not have pad and curb type containment under them - **WFS within 30 days of receipt of this letter will propose a time line to the OCD for coming into compliance with this item.**

B. Waste issues - it appears that painting does occur at the facility as paint products were found to be in storage at the site - **WFS shall within 30 days of receipt of this inspection report determine how the paint waste is disposed/recycled and provide the OCD with an answer.**

C. Solvents - WFS shall not commingle solvent wastes with other wastes that are non-hazardous in terms of RCRA unless WFS can prove by characteristic testing or process knowledge (i.e. MSDS) that the solvent is non-hazardous. **WFS will address this issue within 30 days of receipt of this inspection report to the OCD.**

(D.) WFS needs to make certain that only RCRA Subtitle C Exempt wastes are being disposed of at Class II UIC disposal well facilities - and other wastes that do not meet the criteria of the exemption are not injected into class II UIC disposal wells.

3. GW-63 or Pump Mesa Compressor Station, (Inspected 06/04/96)

A. Same as (1.) and (2.) above.

4. GW-64 or Middle Mesa Compressor Station, (Inspected 06/04/96)

A. Same as (1.) and (2.) above.

B. A 5 gallon can of "Carburetor Cleaner" NAPA 6406 containing Methylene chloride was found at the site - it appears POI uses this chemical as part of valve maintenance on the recipis - WFS should require POI to use solvents that would not cause potential RCRA problems - as an example what would happen if a 5 gallon can of this chemical were accidentally spilled into to the below grade waste water piping at the site and then hauled to a class II disposal well?

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5. **GW-87 or Cedar Hill Compressor Station, (Inspected 06/04/96)**

A. Same as (1.) and (2.) above.

Note: All OCD rules/regulations/and guidelines are available on the Internet at WWW.EMNRD.STATE.NM.US.

The OCD would like to thank the Williams Field Service Operators for their professional conduct during the discharge plan inspection site visits.

If there any questions regarding this report feel free to call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez
Petroleum Engineering Specialist

XC: Mr. Denny Foust - Geologist.

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**ATTACHMENT NO.1 - WFS GW-61
Horse Canyon COMPRESSOR**

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**ATTACHMENT NO.2 - WFS GW-62
Manzanares COMPRESSOR**

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**ATTACHMENT NO.3 - WFS GW-63
Pump Mesa COMPRESSOR**

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**ATTACHMENT NO.4 - WFS GW-64
Middle Mesa COMPRESSOR**

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**ATTACHMENT NO.5 - WFS GW-87
Cedar Hill COMPRESSOR**

<WFS> GW-087 (PHOTOS BY OCD)



PHOTO NO. 01

DATE: 06/04/96



PHOTO NO. 02

DATE: 06/04/96

<WFS> GW-087 (PHOTOS BY OCD)



PHOTO NO. 03

DATE: 06/04/96



PHOTO NO. 04

DATE: 06/04/96

<WFS> GW-087 (PHOTOS BY OCD)



PHOTO NO. 05

DATE: 06/04/96