GW - 180

PERMITS, RENEWALS, & MODS Application

Lowe, Leonard, EMNRD

From:

Lowe, Leonard, EMNRD

Sent:

Wednesday, October 28, 2009 3:44 PM

To:

'Bays, David'; 'Deklau, Ingrid'; Sandoval, Monica; 'Dailey, Aaron';

'carol.cauthen@williams.com'

Cc:

Perrin, Charlie, EMNRD; Powell, Brandon, EMNRD

Subject:

GW-180 Trunk L CS, Admin. Complete

Attachments:

GW-180 Admin Complete Letter.pdf; GW-180 Draft Permit Cover.pdf; GW-180 Draft

Permit.pdf; GW-180 OCD PN.pdf

Mr. David Bays,

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

CW-180 PERM175

Attached are documents pertaining to this.

OCD has approved your public notice for publishing. Please publish and submit the proof of publication to OCD once received.

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

Thank you for your attention.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNF
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492

Fax: 505-476-3462

E-mail: leonard.lowe@state.nm.us

Website: http://www.emnrd.state.nm.us/ocd/



Bill Richardson

Governor Joanna Prukop Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



October 28, 2009

Dear Mr. Bays:

Re: Discharge Plan Renewal Permit GW-180

Williams Four Corners Trunk L Compressor Station Rio Arriba County, New Mexico

The New Mexico Oil Conservation Division (NMOCD) has received Williams Four Corners LLC's request and initial fee, dated October 1, 2009 to renew GW-180 for their Trunk L Compressor Station located in the SE/4 SE/4 of Section 21, SW/4 SW/4 Section 22 Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

The New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC has been satisfied and demonstrated to the NMOCD. Please provide a proof of publication affidavit once published. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

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

Sincerely,

Leonard Lowe

Environmental Engineer

LRL/lrl

xc: OCD District III Office, Aztec

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor

Joanna Prukop Cabinet Secretary Mark Fesmire
Division Director
Oil Conservation Division



October 28, 2009

Mr. David Bays Williams Four Corners, LLC 188 CR 4900 Bloomfield NM 87413

Re: **DRAFT** Discharge Permit Renewal GW-180 Trunk L Compressor Station SE/4 SE/4 of Section 21, SW/4 SW/4 of Section 22, Township 28 North, Range 5 West,

NMPM

Rio Arriba County, New Mexico

Dear Mr. Bays:

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

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

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Glenn von Gonten Acting Environmental Bureau Chief



DISCHARGE PERMIT GW-180

1. GENERAL PROVISIONS.

A. PERMITTEE AND PERMITTED FACILITY: The Oil Conservation Division (OCD) of the Energy, Minerals and Natural Resources Department issues discharge permit GW-180 (Discharge Permit) to Williams Four Corners (Owner/Operator), located 188 CR 4900, Bloomfield NM 87413, to operate the Trunk L Gas Compressor Station located in the SE/4 SE/4 of Section 21, SW/4 SW/4 of Section 22, Township 28 North, Range 5, West, NMPM, Rio Arriba County (Facility).

The facility provides metering and compression to various producers for the gathering of natural gas. The facility operates at total horsepower of 15,834 HP. Approximately 600-8000 bbl/yr of produced water, 500-8000 bbl/year of condensate and 500 – 2000 gal/year/engine of used oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 40 feet, with a total dissolved solids concentration of approximately 1000 - 2000 mg/L.

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

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

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

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

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

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

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

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

- FILING FEES AND PERMIT FEES: Pursuant to 20.6.2.3114 NMAC, every facility that submits a discharge permit application for initial approval or renewal shall pay the permit fees specified in Table 1 and the filing fee specified in Table 2 of 20.6.2.3114 NMAC. The OCD has already received the required \$100.00 filing fee for this application. The flat fee for a compressor station operating greater than 1001 HP is \$1700.00. The Owner/Operator shall submit this amount along with the signed Discharge Permit. Checks should be made out to the "New Mexico Water Quality Management Fund," not the Oil Conservation Division.
- G. EFFECTIVE DATE, EXPIRATION, RENEWAL CONDITIONS, AND PENALTIES FOR OPERATING WITHOUT A DISCHARGE PERMIT: This Discharge Permit is effective when the OCD receives the signed Discharge Permit from the

Owner/Operator, and the \$1700.00 fee. This Discharge Permit will expire on **February 21**, **2015.** The Owner/Operator shall submit an application for renewal no later than 120 calendar days before that expiration date, pursuant to 20.6.2.3106.F NMAC. If an Owner/Operator submits a renewal application at least 120 calendar days before the Discharge Permit expires and is in compliance with the approved Discharge Permit, then the existing Discharge Permit will not expire until OCD has approved or disapproved the renewal application. Operating with an expired Discharge Permit may subject the Owner/Operator to civil and/or criminal penalties. See NMSA 1978, Section 74-6-10.1 and NMSA 1978, Section 74-6-10.2.

- H. MODIFICATIONS: The Owner/Operator shall notify OCD of any facility expansion, production increase, or process modification that would result in any significant modification in the discharge of water contaminants. See 20.6.2.3107.C NMAC. OCD may require the Owner/Operator to submit a permit modification pursuant to 20.6.2.3109.E NMAC, and the OCD may modify or terminate a permit pursuant to NMSA 1978, Section 74-6-5(M) through (N).
- I. TRANSFER OF DISCHARGE PERMIT: Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of the Facility, the transferor shall notify the transferee in writing of the existence of the Discharge Permit, and shall deliver or send by certified mail to OCD a copy of such written notification, together with a certification or other proof that such notification has been received by the transferee pursuant to 20.6.2.3111 NMAC. Upon receipt of such notification, the transferee shall inquire into all of the provisions and requirements contained in the Discharge Permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in OCD's file or files concerning the Discharge Permit. Upon assuming either ownership or possession of the Facility the transferee shall have the same rights and responsibilities under the Discharge Permit as were applicable to the transferor. See 20.6.2.3111 NMAC.

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

Transfer of the ownership, control, or possession of the Facility does not relieve the transferor of responsibility or liability for any act or omission which occurred while the transferor owned, controlled or was in possession of the Facility. See 20.6.2.311.E NMAC.

- J. CLOSURE PLAN AND FINANCIAL ASSURANCE: The Owner/Operator shall notify OCD in writing when any operations of the Facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this Discharge Permit, or upon request from OCD, the Owner/Operator shall submit a closure plan, modified closure plan, and/or provide adequate financial assurance. See 20.6.2.3107 NMAC.
- K. COMPLIANCE AND ENFORCEMENT: If the Owner/Operator violates or is violating a condition of this Discharge Permit, the OCD may issue a compliance order requiring compliance immediately or within a specified time period, suspending or terminating this Discharge Permit, and/or assessing a civil penalty. See NMSA 1978, Section 74-6-10. OCD may

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

2. GENERAL FACILITY OPERATIONS

- A. LABELING: The Owner/Operator shall clearly label all tanks, drums, and containers to identify the contents and provide other emergency notification information. The Owner/Operator may use a tank code numbering system, if that tank code numbering system is incorporated into its approved Contingency Plan.
- B. INSPECTIONS AND MAINTENANCE OF SECONDARY CONTAINMENT SYSTEMS: The Owner/Operator shall inspect all secondary containment systems and sumps designed for spill collection/prevention and leak detection at least weekly to ensure proper operation and to prevent over topping or system failure. The Owner/Operator shall record the results of its inspection in a log book.

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

- C. RECORD KEEPING: The Owner/Operator shall maintain at the Facility records of all inspections required by this Discharge Permit for a minimum of five years and shall make those records available for OCD inspection.
- D. TESTING: The Owner/Operator shall provide OCD with notice one week prior to conducting any test required under this Discharge Permit, so that OCD may witness the test. The Owner/Operator shall maintain at the Facility records of all tests conducted pursuant to this Discharge Permit and the results of those tests, and make those records available for OCD inspection. The Owner/Operator shall give verbal notice of a test failure to OCD within 24 hours, and file a written report of the failure with the OCD within 15 days. The Owner/Operator shall complete repairs to correct the failure as provided in its approved Contingency Plan or as required by OCD.
- E. RELEASE REPORTING: The Owner/Operator shall report unauthorized releases of water contaminants pursuant to 19.15.29 NMAC and any additional commitments made in the approved Contingency Plan. For purposes of this Discharge Permit, "releases" includes breaks,

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

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

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

- G. ANNUAL REPORT: The Owner/Operator shall submit an annual report to OCD by March 15 of each year. The annual report shall include the following:
 - 1. For each waste stream, the amount of effluent and waste solids generated and stored in the prior calendar year;
 - 2. The amount of and final disposition of each waste stream;
 - 3. A copy of all inspections conducted of secondary containment systems; and
 - 4. The nature and amount of any releases, with a description of the disposition of any contaminated soil or water.

3. MATERIAL STORAGE.

- A: DRUM AND CONTAINER STORAGE: The Owner/Operator shall store all drums and other containers, including empty drums and containers, on a curbed, impermeable pad. "Containers" include tote tanks, sacks, and buckets. The Owner/Operator shall store empty drums on their sides with the bungs in place and lined up on a horizontal plane. These requirements do not apply to drums and containers that contain only fresh water and are clearly so labeled.
- B. PROCESS, MAINTENANCE, MATERIAL, AND WASTE STORAGE AREAS: The Owner/Operator shall pave and curb all process, maintenance, material and waste storage areas at its facility, or incorporate another appropriate spill collection device for the areas. (See 20.6.2.1203C(2) NMAC).
- C. ABOVE GROUND TANKS: The Owner/Operator shall place above ground tanks on impermeable pads and surround the tanks with lined berms or other impermeable secondary containment system having a capacity at least equal to one and one-third times the capacity of the largest tank, or, if the tanks are interconnected, of all interconnected tanks. The

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

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

4. WASTE MANAGEMENT.

- A. WASTE STREAMS: This Discharge Permit authorizes the Owner/Operator to handle the waste streams identified in its approved Discharge Plan Application. Owner/Operator must obtain OCD approval for disposal of any waste stream not identified in its approved Discharge Plan Application.
- **B.** WASTE STORAGE: The Owner/Operator shall store waste at its Facility only in clearly marked waste storage areas that have been identified in its approved Discharge Plan Application, except that waste generated during emergency response operations may be stored elsewhere for no more than 72 hours. OCD may approve additional waste storage areas on a case-by-case basis. The Owner/Operator shall not store oil field waste (see 19.15.2 NMAC) on site for more than 180 calendar days without obtaining approval from OCD.
- C. WASTE DISPOSAL: This Discharge Permit does not authorize on site disposal of nondomestic wastes.

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

D. CLASS V WELLS: Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are UIC Class V injection wells, pursuant to 20.6.2.5002.B NMAC.

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

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

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

The Owner/Operator must test existing below-grade tanks, pits and ponds without secondary containment and leak detection annually or as specified herein. The Owner/Operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods.

- **B. EXISTING SUMPS:** A sump is any impermeable vessel or collection device incorporated within a secondary containment system, with a capacity less than 500 gallons, which remains predominantly empty, serves as a drain or receptacle for *de minimis* releases on an intermittent basis and is not used to store, treat, dispose of or evaporate products or wastes. The Owner/Operator shall empty all sumps of all materials at least once a week.
- C. NEW BELOW-GRADE TANKS, PITS, PONDS AND SUMPS: The Owner/Operator shall obtain OCD's approval before installing a new below-grade tank, pit, pond or sump. The Owner/Operator should submit a proposed design plan to OCD to install a new below-grade tank, pit, pond or sump at least 90 calendar days before it intends to install the new unit. Design plans for below-grade tanks, pits, and ponds shall incorporate secondary containment and leak detection. Proposed design plans for pits and ponds shall include hydrologic and geologic reports, siting information, monitoring and closure plans and information on foundation and liners. OCD will review and approve, approve with conditions, or deny the Owner/Operator's proposed design for a new below-grade tank, pit, pond or sump.
- **D. FENCING:** The Owner/Operator shall fence all below-grade tanks, pits and ponds pursuant to 19.15.17.11.D NMAC.
- E. SCREENING AND NETTING: The Owner/Operator shall screen or net all open top tanks that are eight feet in diameter or larger and all pits (including lined pits), or otherwise render the tanks and pits non-hazardous to wildlife, including migratory birds, pursuant to 19.15.17.11.E NMAC.
- 6. UNDERGROUND PROCESS AND WASTEWATER PIPELINES.

- A. TESTING: The Owner/Operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water. The Owner/Operator shall test all pressure-rated pipe to 150% of the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The Owner/Operator may propose other test methods for OCD's review and approval.
- B. SCHEMATIC DIAGRAMS OR PLANS: The Owner/Operator shall maintain at its Facility all underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location.
- C. NEW UNDERGROUND PIPING: The Owner/Operator must notify OCD prior to installing any new underground piping. The Owner/Operator should submit a design plan to the OCD for new underground piping at least 90 calendar days before it intends to begin construction. The OCD shall determine whether any modifications to this Discharge Permit are necessary and appropriate based on the new underground piping.
- 7. STORM WATER: The Owner/Operator shall implement and maintain storm water runon and run-off plans and controls to separate chemical process areas and flow lines (contact areas)
 from storm water areas (non-contact areas), and shall comply with any additional commitments
 made in its approved Contingency Plan. The movement of storm water from a contact area to a
 non-contact area is a release, and the Owner/Operator shall report that release and take corrective
 action.
- 8. ADDITIONAL SITE SPECIFIC CONDITIONS: N/A
- 9. CERTIFICATION: (OWNER/OPERATOR) by the officer whose signature appears below, acknowledges receipt of this Discharge Permit, and has reviewed its terms and conditions.

| Company Name - print name above | |
|-------------------------------------|---|
| Company Representative - print name | _ |
| Company Representative - Signature | |
| Title | |
| Date: | |

NOTICE OF PUBLICATION

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

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

(GW-180) Mr. David Bays, Environmental Coordinator, Williams Four Corners, 188 CR 4900, Bloomfield NM, has submitted a renewal application for the previously approved discharge plan for their Trunk L compressor station, located in the SE/4 SE/4 of Section 21, SW/4 SW/ of Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County. The facility provides metering and compression to various producers for the gathering of natural gas. The facility operates at total horsepower of 15,834 HP. Approximately 600-8000 bbl/yr of produced water, 500-8000 bbl/year of condensate and 500 – 2000 gal/year/engine of used oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 40 feet, with a total dissolved solids concentration of approximately 1000 - 2000 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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

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

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

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

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

| I hereby acknowledge receipt of check No dated 10/7/09 |
|--|
| from Cirrus Consulting |
| , |
| for <u>GW-180</u> |
| Submitted by: / Aurence Kornero Date: 10/19/09 |
| Submitted to ASD by: Jacobse Form Date: 18/19/09 |
| Received in ASD by: Date: |
| Filing Fee New Facility Renewal |
| ModificationOther |
| Organization Code 521.07 Applicable FY 2004 |
| To be deposited in the Water Quality Management Fund. |
| Full Payment or Annual Increment |

RECEIVED Cirrus Consulting, LLC

2009 OCT 9 AM 10 53

October 6, 2009

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

Subject:

Discharge Plan Renewal Application

Williams Four Corners, LLC Trunk L Compressor Station (GW-180)

Dear Mr. Lowe:

On behalf of Williams Four Corners, LLC, Cirrus Consulting, LLC submitted the Discharge Plan renewal application for the Trunk L Compressor Station (GW-180) to you via email on October 6, 2009. A copy of the email was also forwarded to Brandon Powell, OCD District 3.

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

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

Sincerely,

Ingrid Deklau

District II
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1200 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 Submit Original
Plus I Copy
to Santa Fe
I Copy to Appropriate
District Office

Revised June 10, 2003

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

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

| | New Renewal Mödification | | | | | | |
|----------------|---|--|--|--|--|--|--|
| 1. | Type: Compressor Station (Trunk L Compressor Station, GW-180) | | | | | | |
| 2. | Operator: Williams Four Corners, LLC | | | | | | |
| Ad | dress: 188 CR 4900, Bloomfield, NM 87413 | | | | | | |
| C ₀ | ntact Person: David Bays Phone: 505-634-4951 | | | | | | |
| 3. | Location: SE/4 SE/4 Section 21; SW/4 SW/4 Section 22 Township 28North Range 5 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. fac | Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the cility. | | | | | | |
| 6. | Attach a description of all materials stored or used at the facility. | | | | | | |
| 7. wa | Attach a description of present sources of effluent and waste solids. Average quality and daily volume of ste 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. | 0. Attach a routine inspection and maintenance plan to ensure permit compliance. | | | | | | |
| 11. | 1. Attach a contingency plan for reporting and clean-up of spills or releases. | | | | | | |
| | Attach geological/hydrological information for the facility. Depth to and quality of ground water must be luded. | | | | | | |
| | Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other D rules, regulations and/or orders. | | | | | | |
| b N | 4. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the test of my knowledge and belief. Name: Carol Cauthen; Signature: E-mail Address: carol.cauthen@williams.com Title: Environmental Specialist Date: 10/1/2009 | | | | | | |



Trunk L Compressor Station

NMOCD Discharge Plan GW-180 Renewal

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

October 2009

Item I

Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant (CO_2 removal) and compressor station include the total combined site rated horsepower.

The Trunk L Compressor Station is owned and operated by Williams Four Corners, LLC (Williams). The station was constructed in 1995 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams system. The site is permitted for fourteen reciprocating compressor engines (site-rated at 1131 horsepower each) and seven dehydrators. Compressors and dehydrators may be installed or removed to meet demand. In addition, there are various storage tanks, support structures and ancillary equipment.

Item 2

Name of operator or legally responsible party and local representative.

Legally Responsible Party/

Operator

Williams Four Corners, LLC

188 County Road 4900

Bloomfield, NM 87413 (505) 632-4600/4634

(800)-645-7400 (24 hour emergency notification)

Local Representative

David Bays

Williams Four Corners, LLC

188 County Road 4900 Bloomfield, NM 87413

(505) 634-4951

Item 3

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

Rio Arriba County, New Mexico

Township 28 North, Range 5 West, SE/4 SE/4 Section 21; SW/4 SW/4 Section 22

The topographic map is attached as Figure 1.

Item 4

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

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

Item 5

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

There have been no modifications to this section. See information on-file at OCD. The facility plot plan has been updated and is included with this document as Figure 2.

Item 6

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

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

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

Item 7

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

The source, quantity, and quality of effluent and waste solids expected to be generated at the compressor station are summarized in Table 2.

Item 8

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

There have been no modifications except that used oil filters and oil soaked pads and socks will be recycled per OCD regulations. This is reflected in Table 1, which describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site. See additional information on-file at OCD.

Itom 0

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

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

Item 10

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

There have been no modifications to this item. See information on-file at OCD.

Item 11

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

There have been no modifications to this item. See information on-file at OCD.

Item 12

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

A current well search was performed using the New Mexico Office of the State Engineer's WATERS Database(1) for this renewal application. There is no new information to report for this item. Information on the two documented water wells in the vicinity of the Trunk L Compressor Station is presented in the table below. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 1000-2,000 mg/l. The closest documented source of groundwater is the alluvial deposits of an unnamed ephemeral stream channel at an elevation of 6700 feet(3). Depth to groundwater is expected to be over 40 feet. See additional information on-file at OCD.

| Township; Range; Section | Quarter ^a | Apx. Distance from Site (mi) | Well # | Use ^b | Well Depth (ft) | Water Bearing Stratification (ft) | Description | Depth to Water (ft) |
|--------------------------------|----------------------|------------------------------|--------|------------------|-----------------------|--|-----------------------------------|------------------------------|
| | | | | | | 60-100 | 5 | |
| | | | SJ | | | 200-240 | Drilled in 1953; source shallow; | |
| 28N; 5W; 28 | 3 | >1 | 00036 | IND | 303 | 260-285 | Sandstone/gravel/conglomerate | 243 |
| | | | SJ | NO | | 140-185 | Drilled in 1953; Source: shallow; | |
| 28N; 5W; 28 | Unknown | Unkņown | 00047 | Т | 465 | 200-245 | Sandstone/gravel/conglomerate | 265 |

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

Note b: IND = industrial; NOT=no use of right or point of diversion

References

¹Online Well Reports and Downloads, New Mexico Office of the State Engineer, search performed 9/25/2009.

²Stone, 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.

³Klausing, R.L. and G.E. Welder, 1984, Availability of Hydrologic Data in San Juan County, New Mexico:, U.S.G.S. Open-File Report 84-608.

Item 13

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

There have been no modifications to this section. See information on-file at OCD.

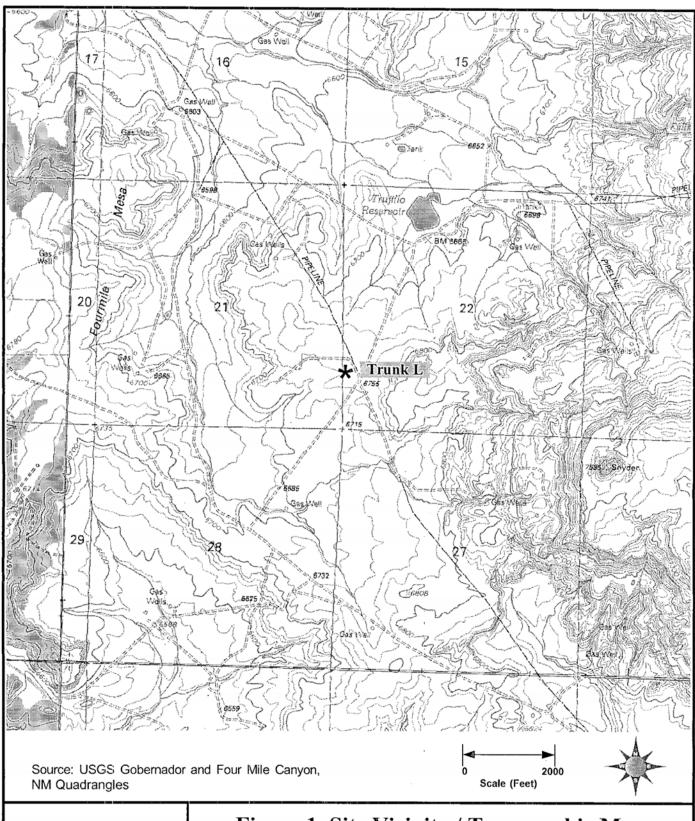




Figure 1 Site Vicinity / Topographic Map Trunk L Compressor Station

Section 22, Township 28N Range 5W Rio Arriba County, New Mexico

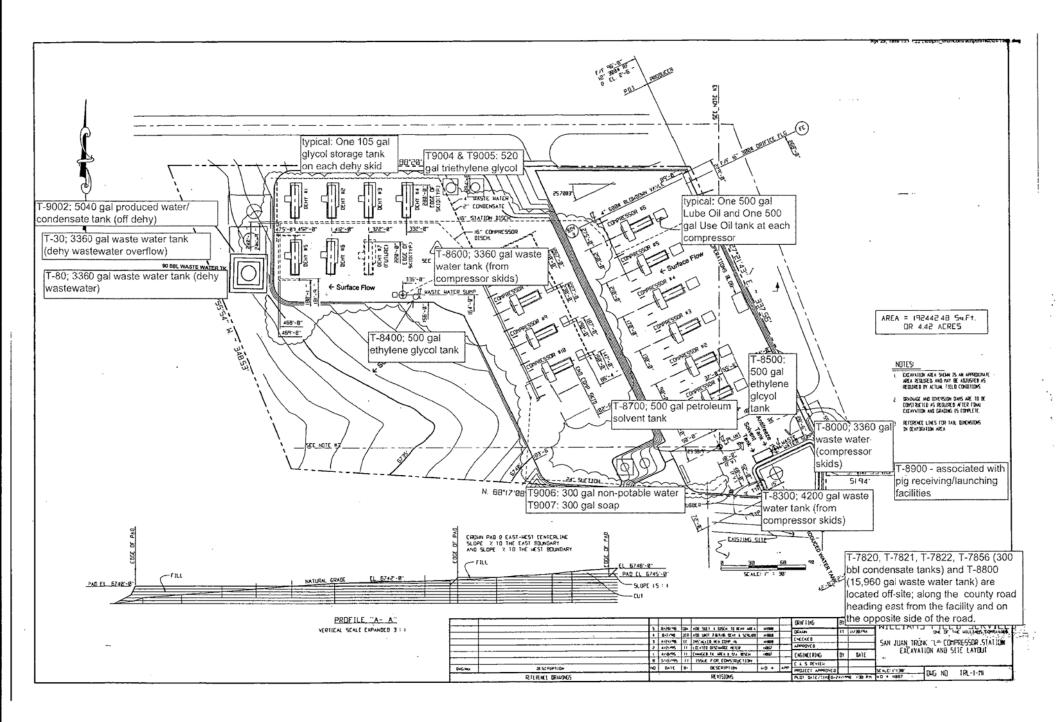


Table 1
Transfer, Storage and Disposal of Process Fluids, Effluent and Waste Solids

| PROCESS FLUID/WASTE | STORAGE | STORAGE CAPACITY (approximate) | CONTAINMENT/ SPILL PREVENTION | RCRA STATUS | DESCRIPTION OF FINAL DISPOSITION |
|--|------------------------------|--------------------------------------|---|-----------------------|--|
| Used Oil | Above ground storage tank | 500 gal* | Concrete pad and wastewater sump | Non- exempt | May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling. |
| T80: Waste Water (dehy waste water) T30: Waste Water (dehy waste water overflow) | Below grade tank | 3360 gal each | Double wall, double bottom tanks | Exempt | Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. |
| T8300: Waste Water (compressor skids) | Above ground storage tank | 4200 gal | Earthen berm, lined | Non- exempt | Contractor may pump wash water back into truck after washing; water may be transported to any facility permitted by any state, federal, or tribal agency to receive industrial solid waste; or evaporation at Williams' facility may be considered. Any waste determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste. |
| T8600 and T8000: Waste Water Sumps (compressor skids) | Below grade tank | 2@3360 gal | Double wall, double bottom | Non- exempt | Contractor may pump wash water back into truck after washing; water may be transported to any facility permitted by any state, federal, or tribal agency to receive industrial solid waste; or evaporation at Williams' facility may be considered. Any waste determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste. |
| T9002: Natural Gas Condensate/ Produced Water (off dehy) | Below grade tank | 5040 gal | Double wall, double bottom tank | Exempt | Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. |
| Natural Gas Condensate | Above ground storage tank | 4 @ 300 bbl | Lined earthen berm | Exempt | Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. |
| T8800: Natural Gas Condensate/Produced Water | Below grade tank | 380 bbl | Double wall, double bottom tank | Exempt | Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. |
| T8900: Natural Gas Condensate | Above ground storage tank | 200 gal | Metal pan | Exempt | Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. |
| Used Oil Filters, Oil Soaked Pads & Socks | Drum or other container | Varies | Transported in drum or other container | Non- exempt | Used oil filters and oil soaked pads and socks will be recycled as required by OCD regulations. |
| Used Process Filters | Drum or other container | Varies | Transported in drum or other container | Exempt | Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available. |
| Spill Residue (e.g., soil, gravel, etc.) | N/A ⁻ | N/A | In situ treatment, land-farm, or alternate method | Incident dependent | Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases. |

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

| PROCESS FLUID/WASTE | STORAGE | STORAGE CAPACITY (approximate) | CONTAINMENT/ SPILL PREVENTION | RCRA STATUS | DESCRIPTION OF FINAL DISPOSITION |
|---------------------------------------|---|--------------------------------------|--|-----------------|--|
| Used Absorbents | Drum or other container | Varies | Transported in drum or other container | Non- exempt | Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available. |
| Empty Drums / Containers | N/A | N/A | Berm or transported to Williams' or contractor facility | Non - exempt | Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations. |
| T9006: Non-Potable Water | Above ground storage tank | 3000 gal | None | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| T9007: Soap | Above ground storage tank | 300 gal | Metal pan | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| T8400 & T8500: Ethylene Glycol | Above ground storage tank | 500 gal 500 gal | Metal pan Concrete pad/waste water sump | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| Triethylene Glycol | Above ground storage tank (Unit day tank) | 105 gal* | Concrete pad with drain to dehy waste water tank | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| T9004 & T 9005: Triethylene Glycol | Above ground storage tank | 520 gal | Metal Pans | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| Lube Oil | Above ground storage tank | 500 gal* | Concrete pad and wastewater sump | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| T8700: Petroleum- based Solvent | Above ground storage tank | 500 gal | Concrete pad and wastewater sump | 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. AST=Above Ground Storage Tank

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

| PROCESS FLUID / WASTE | SOURCE | QUANTITY (Ranges) | QUALITY | |
|---|---|-----------------------------|--|--|
| Natural Gas Condensate/ Produced Water Inlet Scrubber, Gas Separator, Dehydra Condensate Tan | | 600-8000 bbl/year | May contain trace lube oil and/or glycol | |
| Natural Gas Condensate | Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank | 500-8000 bbl/year | No Additives | |
| Waste Water/ Wash Down Water | Compressor and Dehy Skids; Process Areas; Condensate Tank | 100-5000 gal/year/unit | Biodegradable soap and tap water with traces of used oil and/or glycol | |
| Used Glycol/Antifreeze/ Methanol | Site and Field Dehydration/ Coolant | 0-4000 bbl/yr | No additives | |
| Used Solvent Parts Cleaner; Pipeline Additive | | 0-500 gal/year | No additives | |
| Used Oil Compressors | | 500-2000 gal/year/engine | Used Motor Oil w/ No Additives | |
| Used Oil Filters | Compressors | 50-500/year/engine | No Additives | |
| Used Process Filters | Charcoal, Activated Carbon, Molecular Sieve | 50-500 cubic yd/yr | No Additives | |
| Used Process Filters | Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol | 75-500/year | No Additives | |
| Empty Drums/Containers | Liquid Containers | 0-80/year | No Additives | |
| Spill Residue (i.e. soil, gravel, etc) | Incidental Spill | Incident Dependent | Incident Dependent | |
| Used Adsorbents | Incidental Spill/Leak Equipment Wipe-down | Incident Dependent | No Additives | |
| Used/off-spec materials (eg. glycol, antifreeze, corrosion inhibitor) | Dehydration and compression | 0-200 gal/yr/material | No Additives | |

See attached DRAFT Public Notice, to include the following:

- Newspaper notice published in Farmington Daily Times in English and Spanish
- Landowner notice to BLM



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

October 1, 2009

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC submitted a Discharge Plan Renewal application to the Oil Conservation Division for the permitted Trunk M Compressor Station (GW-180) in October 2009. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations.

The facility, located in the SE/4, SE/4 Section 21, and SW/4, SW/4 Section 22, Township 28 North, Range 5 West, Rio Arriba County, New Mexico (BLM Grant NM93664 and NM93664#1), approximately 4 miles south-southeast of Gobernador, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100–5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be greater than 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,

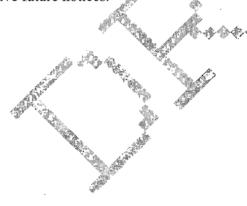
Carol Harkins Environmental Specialist

PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in October 2009 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-181 for their Trunk M Compressor Station located in the SE/4, SE/4 Section 21, and SW/4, SW/4 Section 22, Township 28 North, Range 5 West in Rio Arriba County, New Mexico. The facility, located approximately 4 miles south-southeast of Gobernador, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100 – 5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be greater than 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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



ATENCIÓN PÚBLICA

Williams Four Corners, LLC, County Road 4900, Bloomfield, NM 87413, han presentado una aplicación de renovación en septiembre de 2009 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para la descarga antes aprobada planean GW-180 para su Trunk L Compressor Station localizada en el SE/4, SE/4 de la Sección 21, SW/4, SW/4 de la Sección 22, Municipio 28 Norte, Recorren 5 Oeste en Rio Arriba County, New Mexico. La instalación, sur-sureste de aproximadamente 4 millas localizado de Gobernador, proporciona servicios de acondicionamiento y compresión de gas naturales.

El plan de descarga se dirige como las caídas, los agujeros, y otras descargas casuales a la superficie serán manejados. Los materiales típicos generados o usados en la instalación incluyen el echar agua condensado/producir de gas natural, el petróleo de lubricación nuevo y usado, echar agua de desecho aceitoso del equipo se lavan abajo, y glicol. La cantidad de wastewater generado es 100 – 5000 galones por año por motor. La instalación no descarga para revestir o subrevestir los echares agua. Toda la basura generada será temporalmente almacenada en tanques o contenedores equipados con la contención secundaria. La basura transportó offsite será dispuesto o reciclado en una instalación permitida por la agencia estatal, federal, o tribal recibir tal basura. Se espera que la profundidad de agua subterránea estimada en el sitio esté en la variedad de 40 pies. El total se disolvió se espera que la concentración de sólidos del agua subterránea de área esté en la variedad de 200-2,000 partes por millón.

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

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-180 WILLIAMS FIELD SERVICES, INC. TRUNK L COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS (April 4, 2005)

- 1. Payment of Discharge Permit Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
- 2. <u>Williams Field Services Company Commitments:</u> Williams Field Services Company will abide by all commitments submitted in the discharge permit renewal application dated February 2, 2005 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
 - 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 6. <u>Above Ground Tanks:</u> All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <u>Above Ground Saddle Tanks:</u> Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

- 9. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
 - 14. <u>Transfer of Discharge Permit:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Storm Water Permit:</u> Williams Field Services Company shall maintain storm water runoff controls. As a result of BP America Production Company's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services Company shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services Company shall also take immediate corrective actions pursuant to Item 12 of these conditions.

- 16. Closure: The OCD will be notified when operations of the Trunk L Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk L Compressor Station a closure permit will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. <u>Certification:</u> Williams Field Services Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES COMPANY

SR. ENVERONMENTAL SPECIALIST

Title

OF CHECK/CASH

| I hereby acknowledge receipt of ch | eck No dated 1/19/05 |
|------------------------------------|------------------------------|
| or cash received on | _ in the amount of \$ 200.00 |
| from Williams Field Services | |
| for Trunk L CP | GW-181 |
| Submitted by: | Date: 2-21-05 |
| Submitted to ASD by: | Date: |
| Received in ASD by: | Date: |
| Filing Fee V New Facility | Renewal |
| Modification Other | |
| Organization Code <u>521.07</u> | Applicable FY 2001 |
| To be deposited in the Water Quali | ty Management Fund. |
| Full Payment V or Annual | |

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SANTA FE UNITED STATES

NM 87505

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

E-mail Address: clara.garcia@williams.com

State of New Mexico **Energy Minerals and Natural Resources**

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

Submit Original Plus 1 Copy to Santa Fe

Revised June 10, 2003

1 Copy to Appropriate District Office

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

(Refer to the OCD Guidelines for assistance in completing the application) Modification New Renewal Type: Compressor Station (Trunk L Compressor Station, GW-180) Operator: Williams Field Services Company Address: 188 CR 4900, Bloomfield, NM 87413 Contact Person: Clara Garcia Phone: 505-632-4606 3. Location: Section 21 and 22 Township 28 North Range 5 West Submit large scale topographic map showing exact location. 4. Attach the name, telephone number and address of the landowner of the facility site. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. Attach a description of all materials stored or used at the facility. 6. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. Attach a description of proposed modifications to existing collection/treatment/disposal systems. 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. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief. Name: Clara Ma Garcia Title: Environmental Compliance Signature:



Trunk L Compressor Station

NMOCD Discharge Plan

Williams Field Services 188 CR 4900 Bloomfield, NM 87413



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1.0 TYPE OF OPERATION

The Trunk L Compressor Station was constructed in 1995 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams Field Services (WFS) system.

2.0 LEGALLY RESPONSIBLE PARTY

Williams Field Services 188 CR 4900 Bloomfield, NM 87413 (505) 632-4606

Contact Person:

Clara Garcia, Environmental Compliance Phone and Address, Same as Above

3.0 LOCATION OF FACILITY

The facility is located in Sections 21 and 22, Township 28 North, Range 5 West, in Rio Arriba County, New Mexico, approximately 4 miles south-southeast of Gobernador, New Mexico. The facility latitude and longitude are North 36° 38.572,63' and West 107° 21.263,11'. A site location map is attached (USGS 7.5 Min. Quadrangles: Gobernador and Four Mile Canyon, New Mexico) as Figure 1.

4.0 LANDOWNER

Williams Field Services 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 a field compressor station and is un-manned. The site has been permitted to allow operation of fourteen (14) natural gas recip engines and seven (7) dehydrators. Currently, ten (10) engines, for a combined site-rated horsepower of 15,834 horsepower, and six (6) glycol dehydrators exist at the site. Compressors and dehydrators may be installed or removed to meet demand. The facility layout is illustrated in Figure 2.

6.0 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.



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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, 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. 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.



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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 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 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 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).



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11.0 SITE CHARACTERISTICS

The Trunk L Compressor Station is located on the western foot of Laguna Seca Mesa. The site elevation is approximately 6, 740 feet above mean sea level. The natural ground surface topography slopes downward toward the southwest. The maximum relief over the site is approximately 15 feet. Intermittent flow from the site will follow the unnamed drainage towards the southwest. The drainage turns north and flows approximately 2.8 miles to Gobernador Canyon Wash. Gobernador Canyon Wash flows into the San Juan River approximately 19.5 miles west of the site. The San Juan River, at approximately 5,650 feet in elevation, is the nearest downgradient perennial source of surface water to the site.

The site is underlain by quaternary alluvium which has been deposited over the sandstones and shales of the Nacimiento Formation. A review of the available hydrologic data(1) for this area revealed that the closest documented source of ground water downgradient from the site is the alluvial deposits of an unnamed ephemeral stream channel. The channel is located approximately 1,000 feet southwest of the subject site at an elevation of approximately 6700 feet. Ground water within these alluvial deposits flows northwest toward the San Juan River and is expected to have a total dissolved solids (TDS) concentration of approximately 2,000 mg/l. Depth to groundwater is expected to be over 40 feet.

The nearest identified ground water well is owned by Burlington Resources (SJ-00036) and is located in the center of the SW ¼ of Section 28, Township 28 North, Range 5 West, just over 1 mile from the compressor station. Another industrial well, owned by Mamie Mangum (SJ-0036), is also located in the SW ¼ of Section 28, but at an unspecified location. Both these wells are located downgradient of the subject site. Depth to water was reported at 243 feet and 265 feet respectively(2).

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.

References

¹Klausing, R.L. and G.E. Welder, 1984, Availability of Hydrologic Data in San Juan County, New Mexico:, U.S.G.S. Open-File Report 84-608.

Lyford, F.P., May 1979, Ground Water in the San Juan Basin, New Mexico and Colorado, U.S.G.S Water-Resource Investigations 70-73

¹Stone, 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.

²Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2000.

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



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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 TRUNK L COMPRESSOR STATION

| PROCESS FLUID / WASTE | SOURCE | QUANTITY (Ranges) | QUALITY | |
|---|---|------------------------------------|--|--|
| Used Oil | Compressor | 1,000-2,000 gallons/year/engine | Used Motor Oil w/ No Additives | |
| Used Oil Filters | Compressor | 50-100 /year/engine | No Additives | |
| Waste Water | Dehydrator/Dehydrator skid | 600-1,800 barrels/year | Water with some hydrocarbons, lube oil, and glycol | |
| Waste Water | ste Water Compressor Skid | | Biodegradable soap and tap water w/ traces of oil. | |
| Used Process Filters Air, Inlet and Glycol | | 150-200/year | No Additives | |
| Empty Drums/Containers Liquid Containers | | 0-20/year | No Additives | |
| Used/ Off-spec Glycol Dehydrator | | 0-100 gal/year | No Additives | |
| Used/ Off-spec Antifreeze Natural gas compression | | 0-100 gal/year | No Additives | |
| Used/ Off-spec Solvent | sed/ Off-spec Solvent Natural gas compression | | No Additives | |
| Spill Residue (i.e. soil, gravel, etc) | Incident Spill | Incident Dependent | Incident Dependent | |
| Used Adsorbents | Incident Spill/Leak Equipment Wipe-down | Incident Dependent | No Additives | |

TABLE 2 TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS TRUNK L COMPRESSOR STATION

| PROCESS FLUID/WASTE | STORAGE | STORAGE CAPACITY (approximate) | CONTAINMENT/ SPILL PREVENTION | RCRA STATUS | DESCRIPTION OF FINAL DISPOSITION |
|--------------------------|------------------------------|--------------------------------------|---|----------------|--|
| Used Oil | Above Ground Storage Tank | 500 gal tank for each engine | Concrete pad and waste water system | Non-exempt | Transported to a Williams or contactor 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. |
| Waste Water | Above Ground Storage Tank | 4,200 gal | Earthen berm | Exempt | Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility. |
| Waste Water | Above Ground Storage Tank | 2 sumps, 740 gal each | Dual-Walled | Non-exempt | Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility. |
| Waste Water | Above Ground Storage Tank | 3,780 gal and 2,520 gal | Earthen vault | Non-Exempt | Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility. |
| 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. |
| Empty Drums / Containers | N/A | N/A | Berm or transported to a Williams or Contractor facility. | 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 | 500 gallons | Metal tank | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| Glycol | Day Tank on unit | 100 gal for each dehy | Concrete pad and waste water system | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| Lube Oil | Above Ground Storage Tank | 500 gal tank for each engine | Concrete pad and waste water system | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| Petroleum-based Solvent | Above Ground Storage Tank | 300 gallons | Concrete pad and waste water system | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |
| Antifreeze | Above Ground Storage Tank | 500 gallons | Concrete pad and waste water system | N/A | Off-spec material recycled or disposed consistent with applicable regulations. |

FIGURES

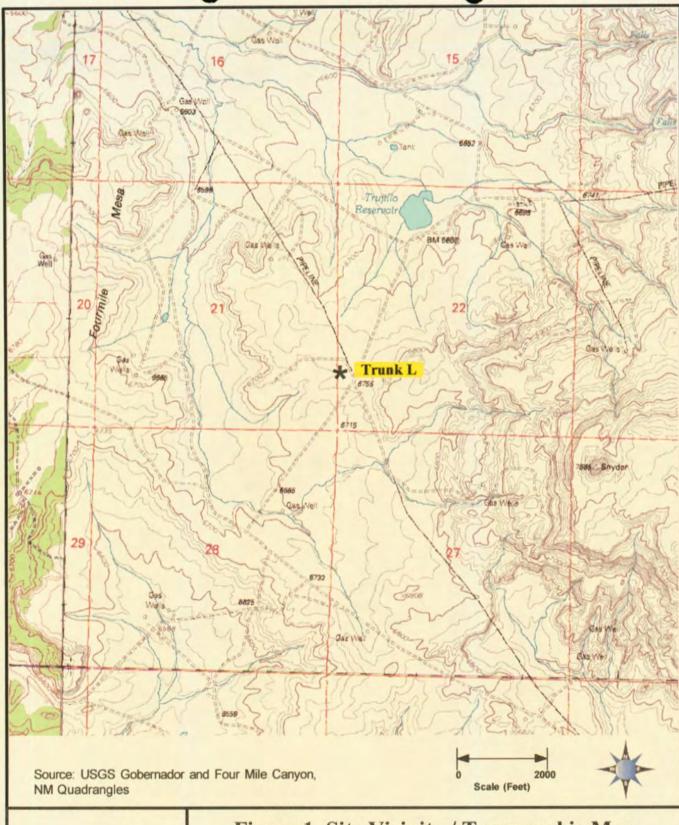
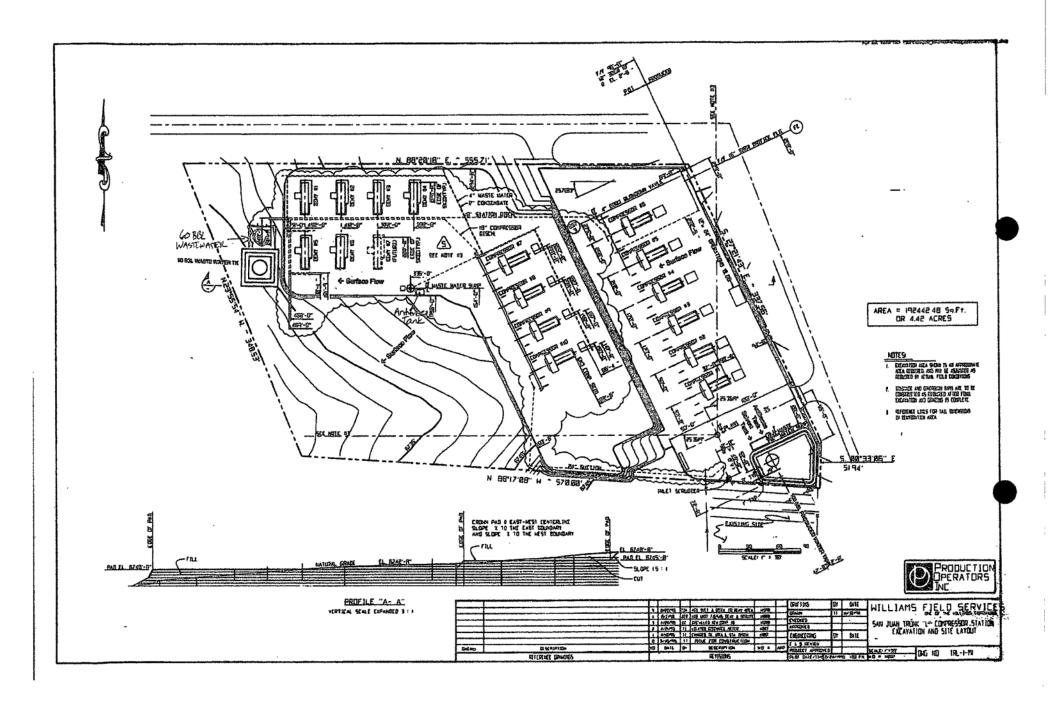




Figure 1 Site Vicinity / Topographic Map Trunk L Compressor Station

Section 22, Township 28N Range 5W Rio Arriba County, New Mexico



APPENDICES

APPENDIX A SPILL CONTROL PROCEDURES

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

Current telephonic

http://processbackbone/livelink/livelink
form WES-35



System Integrity Plan

Environment Protection

SIP-ADM-6.04

Revision No:

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Initiative:

POLLUTION PREVENTION AND SPILL RESPONSE

1.0 OBJECTIVE

1.1 To prevent releases and mitigate their effects if they occur.

2.0 DESCRIPTION

- 2.1 Company operated assets can be the source of releases into the environment, some of which may be harmful to employees, neighboring communities and the environment in which we all live. The Company has established the following standards to prevent and mitigate these environmental impacts and achieve regulatory compliance.
- 2.2 The major aspects of the standards are:
 - 2.2.1 Preparation and implementation of a plan for pollution prevention and spill response (e.g.; Spill Prevention Control and Countermeasures (SPCC), Oil Spill Response Plan (OSRP), etc.) for each applicable Company asset to prevent and/or contain a spill.
 - 2.2.2 Preparation and implementation of spill response plans to identify risks and minimize the potential to harm the environment from a release.
 - 2.2.3 Procedure for reporting releases

3.0 STANDARDS

3.1 The Environmental Team Leader shall:

3.1.1 Establish and maintain 6.04-ADM-001 - Pollution Prevention and Control procedure, 24 hour Release Reporting and Notification system (3E) and 6.04-ADM-002 - Release Reporting procedure for Company operated assets. These procedures will, at a minimum, ensure the Company's compliance with applicable regulations and will be reviewed and updated Annually.

3.2 The Environmental Specialist shall:

3.2.1 Establish and maintain pollution prevention and spill response plans, which may include but are not limited to FRPs, SPCCs or OSRPs as required by applicable regulations per the 6.04-ADM-001 - Pollution Prevention and Control procedure.



- 3.2.2 Coordinate the review and distribution of pollution prevention and spill response plans, which may include FRPs, SPCCs and OSRPs every 5 years from the date of certification and/or modify the plan to address new or different operating conditions or deficiencies within 30 days of identification. Offshore plans shall be reviewed every 2 years. Documentation of the review shall be provided to the MMS Regional Supervisor.
- 3.2.3 When new or additional tasks are required, add the necessary tasks to the <u>EMIS</u> within 30 days of identification.
- 3.2.4 Distribute the pollution prevention and spill response plans.

3.3 The Manager of Operations shall:

- 3.3.1 Coordinate the timely execution of the EMIS/EMPAC pollution prevention and spill response plan tasks that are assigned to local Operations management. Submit required documentation to the Environmental Specialist as required by the task.
- 3.3.2 Prior to initial operation, review pollution prevention and spill response plans, with appropriate personnel as required by <u>EMIS</u> tasks.
- 3.3.3 Maintain documentation required by the <u>EMIS</u> tasks and distribute copies of documentation as instructed in the task (i.e. secondary containment drainage log, survey data for dikes, etc).
- 3.3.4 Prior to initiation of operations and on an annual basis thereafter review the facility's pollution prevention and spill response plans. At a minimum, the annual review should include personnel changes, phone number changes and product changes in tanks. Forward any changes to the area Environmental Specialist. Establish and maintain adequate resources are available to execute the pollution prevention and spill response plans.
- 3.3.5 Report all releases and spills in accordance with the <u>6.04-ADM-002 Release Reporting</u> procedure.

3.4 All Employees shall:

3.4.1 Utilize the pollution prevention and spill response plans for responding to spills, as applicable.

4.0 MEASURES

- 4.1 Number of overdue pollution prevention and spill response plans
- 4.2 Number of drills conducted versus number of drills required

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5.0 LINKS

- 5.1 6.04-ADM-001 Pollution Prevention and Control
- 5.2 6.04-ADM-002 Release Reporting
- 5.3 <u>EMIS</u>
- 5.4 SIP Feedback/Change Request

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System Integrity Plan

Environmentar Protection

6.04-ADM-001

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Procedure:

POLLUTION PREVENTION AND CONTROL OF HYDROCARBON LIQUIDS AND OTHER FLUIDS

1.0 PURPOSE

1.1 To outline the 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 For manned facilities perform daily visual facility inspection. For unmanned facilities perform periodic inspections. Document Inspections on the appropriate Facility Log.
- 2.2 Perform monthly facility inspections and document on the Facility's Monthly Inspection Form or (equivalent).
- 2.3 Perform maintenance or repairs necessary to prevent or stop leaks or releases and document the work following company maintenance and repair procedures.
- 2.4 Maintain appropriate spill response equipment at an easily accessible location at the facility and ensure facility personnel are trained on the materials and their use(s).

2.5 When to Initiate

- 2.5.1 The first person to discover a spill/release at a facility will immediately take appropriate action to protect life, and ensure safety of personnel. An attempt will be made to mitigate the effects of the spill by terminating operations, closing valves, or taking other measures to stop the leak or spill as long as personnel are not in danger.
- 2.5.2 For onshore releases: If the spill is reportable (refer to 6.04-ADM-002 Release Reporting procedure), the appropriate person (usually person discovering the release) will immediately notify the 24 hour O&TS release hotline at 1-888-677-2370 and, if necessary, local emergency response personnel/contractors.

NOTE

The current 24 hour O&TS release hotline is managed by a contractor, 3E. 3E provides 24-hour service/support, to include reporting major incidents and providing on-demand MSDSs.

- 2.5.3 Offshore releases: If the spill creates a sheen (refer to 6.04-ADM-002 Release Reporting procedure), the appropriate person (usually person discovering the release) will immediately notify O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and the Environmental Specialist or his/her management team.
- 2.5.4 Receiving and reviewing the initial release report
 - 2.5.4.1 Onshore releases: Within 24 hours, 3E will distribute an initial release report to the Area. The initial distribution will be made via Area e-mail boxes.
 - 2.5.4.2 Each person that receives an initial report is required to review the report for correctness and clarity. All corrections must be provided to 3E in a return e-mail within 4 working days of receipt.
 - 2.5.4.3 Offshore releases: The ES will complete the <u>WES-35</u> Release Report Form and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt.
- 2.5.5 Receiving a final release report
 - 2.5.5.1 Onshore releases: 3E will gather the corrections from the initial release report and distribute a final report within 5 days of the release. The final report is sent to a distribution list controlled by Williams.
 - 2.5.5.2 Off-shore releases: The ES or Compliance Administrator will gather corrections and distribute the final report to all stakeholders using the appropriate area and final distribution lists.



2.5.6 Providing Follow-up Information on the Release

2.5.6.1 The Operations Manager or his/her designee shall notify the local Environmental Specialist of the specific response measures taken to respond to the release and all follow-up actions that were taken as a result of the spill or release, if this information was not reported to 3E. It is recommended that the update be provided within 2 workdays of the actions being completed.

2.6 Facility Pollution Prevention Plans

- 2.6.1 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)
 - 2.6.1.1 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.
 - 2.6.1.2 A Facility Response Plan is a written document that describes the procedures for responding to a spill.

NOTE

If your facility requires a Facility Response Plan (FRP), it will include an Emergency Response Action Plan (ERAP), which is equivalent to a Williams Emergency Response Plan (ERP). Therefore, if a facility has an FRP, Environmental Specialist will be responsible for preparation of the ERAP, and a separate ERP (as required by SIP-ADM-12.01 - Emergency Response and Planning) is not required.

- 2.6.2 The Environmental Specialist is responsible for preparation of SPCC plans or FRPs.
- 2.6.3 Operations is responsible for:
 - 2.6.3.1 Reviewing draft plan(s), providing comments to the Environmental Specialist (ES) and meeting published timeframes for reviews and comments
 - 2.6.3.2 Ensuring it is capable of complying with the document upon publication
 - 2.6.3.3 Reviewing the plan(s) Annually and providing revisions or updates to the ES
 - 2.6.3.4 Performing inspections required by the plan(s)

POLLUTION PRESENTION AND CONTROL OF HYDROCARBON LIQUIDS AND OTHER FLUIDS



6.04-ADM-001

- 2.6.3.5 Maintaining documentation required by the plan(s) on the appropriate forms
- 2.6.3.6 Conducting annual drills if an FRP is in-place for the facility
- 2.6.3.7 Ensuring adequate response contractors are available in the area
- 2.6.3.8 Providing to the ES a current site survey to allow for dike calculations to be conducted, as required by the EPA for SPCC plans
- 2.6.4 Requirements to Maintain Records The facility is required to maintain all inspection logs, secondary containment drainage logs, etc., for a period of 3 years. These records must be maintained in a centralized location at the facility and must be easily accessible to an inspector.
- 2.6.5 Requirements to Maintain the EMIS The EMIS will be populated with all requirements of the facility's plans (SPCC/FRP) and any associated best management practices. The Environmental Group (ES, and CA) is responsible for maintaining the database.
- 2.6.6 Training Requirements The Federal regulations for oil pollution prevention require annual training on the facility's plans and an overall education on plan requirements/purpose. The facility is responsible for ensuring all personnel receive the required SPCC/FRP training on an annual basis.

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

3.3 Forms and Attachments

- 3.3.1 WES-87 Record of Secondary Containment Discharge
- 3.3.2 WES-35 Release Report Form
- 3.3.3 <u>6.04-ADM-002 Release Reporting</u>

POLLUTION PREVENTION AND CONTROL OF HYDROCARBON LIQUIDS AND OTHER FLUIDS

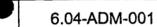
6.04-ADM-001

3.3.4 SIP-ADM-12.01 - Emergency, Response and Planning

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 DOT** Department of Transportation
- 4.3 EPA Environmental Protection Agency
- **4.4** Facility Any terminal, facility, pipeline, etc. owned or operated by Williams.
- 4.5 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.
- 4.6 Hydrocarbons and Other Fluids Hydrocarbons and other fluids include oil, gasoline, diesel, condensate, solvents, other petroleum products, and any mixture of water with any of the above liquids.
- 4.7 MMS Minerals Management Service
- 4.8 Navigable Waters The Clean Water Act defines the navigable waters of the United States as the following: all navigable waters, as defined in judicial decisions prior to the passage of the Clean Water Act, and tributaries of such waters; interstate waters; intrastate lakes, rivers, and streams that are used by interstate travelers for recreational or other purposes; and intrastate lakes, rivers, and streams from which fish and shellfish are taken and sold in interstate commerce.
- 4.9 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.
- 4.10 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.

POLLUTION PREVENTION AND CONTROL OF HYDROCARBON LIQUIDS AND OTHER FLUIDS



- 4.11 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).
- 4.12 OSRO Oil Spill Response Organization
- 4.13 PREP National Preparedness for Response Exercise Program
- 4.14 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.
- 4.15 RSPA Research and Special Programs Administration
- 4.16 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.
- 4.17 Underground Storage Tank (UST) A tank that has all its surfaces below the existing grade.
- 4.18 USCG United States Coast Guard

>>>End of Procedure << <



Energy Services

| System Integrity | Document No. 6.04- | 6.04-ADM-002 | | |
|------------------|--------------------|--------------|--|--|
| Revision No: | Effective Date: | Page: | | |
| , 5 | 01/01/04 | 1 of 9 | | |

Procedure:

RELEASE REPORTING

1.0 PURPOSE

1.1 To define the process for reporting releases.

2.0 PROCEDURE

2.1 This Procedure Applies To Liquid And Gas Releases.

2.2 The Environmental Specialist (ES) will:

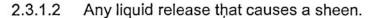
- 2.2.1 Provide information and guidance to each Area where exceptions to this procedure are required based on State laws, rules and/or permit conditions, including specifics on the required alternate or revised reporting.
- 2.2.2 Review scheduled blow-down events in order to determine whether or not a permit is required. Allow sufficient time for Operations to obtain a gas analysis if necessary – data may be required in calculations.
- 2.2.3 Coordinate with appropriate regulatory agencies, obtain required permits and inform Operations of regulatory requirements that must be met prior to performing blow-downs.
- 2.2.4 Submit release follow-up information to the applicable regulatory agencies.
- 2.2.5 Contact local Operations to ensure adequate response measures have been taken for each release and track closure of each release with the appropriate regulatory agencies, if necessary.

NOTE

Third parties operating Company' facilities (i.e., Hanover/POI) are responsible for adhering to this guidance document and reporting releases appropriately. Written reports are required to be submitted to Agencies within 5 – 7 days of the notification of a reportable release and Operations will be involved in verifying that the information submitted by the Area Environmental Specialist is accurate.

2.3 Offshore Releases

- 2.3.1 A reportable offshore release is:
 - 2.3.1.1 Any atmospheric releases greater than 50 mscf when in gaseous form prior to release. This threshold may be increased by the ES for specific areas or facilities based on state and local regulations.



2.3.2 Gas Only Releases

- 2.3.2.1 Operations will immediately report all reportable offshore gas releases within one hour of occurrence or discovery to the Environmental Specialist and the DOT Compliance . Coordinator.
- 2.3.2.2 The Environmental Specialist and the DOT Compliance Coordinator will determine whether the incident is reportable to any regulatory agencies, and will complete any required telephonic reporting to the appropriate regulatory agencies.
- 2.3.2.3 The Environmental Specialist will complete the WES Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 5 working days.
- 2.3.2.4 The Environmental Specialist and DOT Compliance Coordinator will complete any required follow-up written reports and/or documentation.
- 2.3.3 Liquid Hydrocarbon or Gas and Liquid Hydrocarbon Releases
 - 2.3.3.1 Operations will immediately report any offshore release that causes a sheen to O'Brien's Oil Pollution Services (OOPS) (985-781-0804). OOPS will make the required notifications and reports to the appropriate regulatory agencies.
 - 2.3.3.2 Operations will also immediately report any offshore releases to the Environmental Specialist and the DOT Compliance Coordinator that meet the reportable criteria of this document.
 - 2.3.3.3 The Environmental Specialist will complete the <u>WES-35</u> Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 5 working days, based on the release report provided by OOPS.
 - 2.3.3.4 The DOT Compliance Coordinator will complete any required follow-up reports and/or documentation relating to transportation-related agency requirements (e.g., DOT).

2.4 Onshore Releases

2.4.1 Operations will communicate all reportable onshore releases within one hour of their occurrence or discovery to 3E at 1-888-677-2370. Refer to the Onshore Release/Spill Notification Flowchart. 3E will notify the appropriate regulatory agencies in accordance with the Release Matrices.

2.4.2 A Reportable Release is:

- 2.4.2.1 A release of liquid (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) where the release is greater than 1 gallon if a one-time event, or greater than 5 gallons within a 24-hour period if a cumulative event (i.e., drips). See exclusions in 2.4.3.
- 2.4.2.2 Any release of liquid (greater than 1 gallon) outside the facility boundary
- 2.4.2.3 Any release, regardless of size, which enters a waterway (i.e., ditch, arroyo, intermittent stream, etc.),
- 2.4.2.4 All atmospheric releases greater than 50 mscf when in gaseous form prior to release. This threshold may be increased by the ES for specific areas or facilities.

2.4.3 A Non-Reportable Release is:

- 2.4.3.1 Sheen on rainwater within a facility not resulting from a release event. Sheen on rainwater in dikes and/or valve boxes not resulting from a release event. (Follow proper disposal and housekeeping practices.)
- 2.4.3.2 Gaseous releases less than 50 mscf. This threshold may be increased by the ES for specific areas or facilities.
- 2.4.3.3 Routine, permitted gaseous releases to a control device (i.e., a flare)

NOTE - FLARES

A flare may have permit limits and may require tracking of flaring events. Refer to facility specific flare procedures if applicable. Any exceedance of permit limits (including smoking flares) must be immediately reported to your local Environmental Specialist and not to 3E.

2.4.4 The information required to be reported for all onshore releases is listed in WES Release Report Form.

2.5 Whom to Call:

- 2.5.1 Onshore Releases Our third party contractor (3E) at the toll free number 1-888-677-2370.
- 2.5.2 Offshore releases involving a sheen Our third party contractor (OOPS) at the number 1-985-781-0804, your area ES and the DOT Compliance Coordinator.
- 2.5.3 Offshore Releases not involving a sheen Your area ES and the DOT Compliance Coordinator.

2.6 Post Report Follow-up

- 2.6.1 The following information on all Reportable Releases will be submitted to the Environmental Specialist by Operations within 45-days of the release or its discovery:
 - 2.6.1.1 Quantity of soil removed to capture release
 - 2.6.1.2 Description of soil "disposal" (i.e., land, farm, landfill)
 - 2.6.1.3 Quantity of water/product removed and disposed of to respond to release
 - 2.6.1.4 What was done with the water/product
 - 2.6.1.5 Update of the cost incurred from the release. This includes the cost of lost product, associated repair costs and costs to respond to and clean up the release (payroll, material/supplies and/or outside services), even if only a portion of this information is known
- 2.6.2 The Environmental Specialist will ensure:
 - 2.6.2.1 The required written reports are completed and sent to the SERC following a release that has been reported to a federal or state agency.
 - 2.6.2.2 The release database is updated with quantities released and remedial action taken.
- 2.7 The Release Report Database Compliance Specialist in Tulsa will maintain the release database, to include follow-up information. Operations is not required to maintain copies of release reports; however, Operations will be responsible to ensure adequate and accurate information is provided to 3E, the ES, and the DOT Compliance Coordinator.

3.0 REFERENCES

3.1 Regulatory - There are various regulatory requirements at the State and Federal level that require Williams to report releases. The releases that exceed their specific reportable quantity will be reported to the appropriate regulatory agencies.

3.2 Related Policies/Procedures

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

3.3 Forms and Attachments

- 3.3.1 WES-35 Release Report Form
- 3.3.2 Offshore Incident Notification Matrix
- 3.3.3 Onshore Release/Spill Notification Flow Chart
- 3.3.4 Offshore Incident Notification Matrix
- 3.3.5 Telephonic and Written Release Reporting Requirements
- 3.3.6 SIP Feedback/Change Request

4.0 DEFINITIONS

- 4.1 Liquid For the purposes of these reporting criteria, a substance should be reported as a liquid release if it exists in liquid form at the time of the release. Liquid releases should be reported using the measurement unit used when transporting the product. Under some circumstances both liquids and gases are released, and each should be reported separately.
- 4.2 Gas For the purposes of these reporting criteria, a substance should be reported as an atmospheric release of gas if it exists in gaseous form at the time of the release. Gas releases should be reported using the measurement unit used when transporting the product (i.e., natural gas: mscf; propane: barrels, etc.). Under some circumstances both liquids and gases are released, and each should be reported separately.
- 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 local Operations (graveled, mowed, cleared, etc.), excluding pipeline right-of-ways.
- **4.4 Offshore Release -** Any release that occurs in a Title E effected zone.
- **4.5** Onshore Release Any release that does <u>not</u> occur in a Title E effected zone.

>>>End of Procedure << <

WES Release Report Form
Call 3E at 1-888-67 370 to report all releases (suspended or confirmed)

| Is this a d | Irill: | ~ | Type of Dri | II: [| ▼ | | Will | liams |
|-------------|------------------------------------|-----------------|-----------------|-------------------------|-------------------------|----------------|------------|-----------|
| Release F | Reported by: | : [| Please provid | de the correct spelling | Report Time: | | |] |
| Phone Nu | ımber: | | 7.10000 2.107.1 | | Job Title: | | | |
| Date Rele | ase Occurre | ed: | | | | | | |
| Month | | ~ | ∙ Day | • | Year | • | State | ~ |
| Product F | Released: | | | ~ | Estimated F | Released | 0 | (a) |
| | | | | Estim | ated Free Liquids F | Recovered | 0 | (b) |
| Released | to: | | ₩ | | nated Amount Reco | | 0 | (c) |
| | | | | Estima | ated Total Amount F | Recovered | 0 | (b+c) |
| Define Of | ther: | | | Estir | nated Amount Not F | Recovered | 0 | (a-b-c) |
| Note: For | a release to | be contained | inside of a " | dike" it must be a pe | rmanent dike designe | d specifically | to contain | releases. |
| Rolease F | Reportable? | - | Water | vay Affected? | ▼ Name | 1 | | |
| ixcicase i | of a Charles of high second a last | | | | that Emergency Resp | onse is not re | quired. | |
| Report | Date | Number | | Name | Title | Ci | | State |
| NRC [| | | - | | | | | II a |
| SERC [| | | | | | | 200 | 1 4 |
| 3E Only | Was a writ | ten report re | quested? | Time Frame | ▼ Days | | | |
| TNRCC | | | | | | | | |
| 3E Only | If a writter | report is re | quested, do | not provide it. Co | ontact Environment | al Specialist. | | |
| LEPC [| | | | | | | | |
| Other [|] | | | , and the | | | | <u> </u> |
| Business | Unit | | \\ | Asset Group | | ▼ | | |
| Inside Fa | cility Bound | lary? | ▼ 1 | Facility Type: | | | | ~ |
| 1 | ty Asset: [| | ity Name: | Lane or | | | | |
| l . | OR | | | | | | | |
| Pipelin | e Asset: | Pipeli | ne Name: | | | Pipe Type: | | |
| 3E can se | arch the data | base by: Pipe | line, Termin | al, Station, Receipt F | acility or Delivery Poi | int. | | |
| Note: Che | eck "Pipeline | Asset" if relea | ase occurs o | n a pipeline outside | the facility boundary. | Breakout 7 | Tank? | ▼ |
| Incident | Summary: | | | | | | | |
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WES Release Report Form Call 3E at 1-888-677-2370 to report all releases (suspected or confirmed)

| Release Discovered I | oy: | | | | Discov | er Time | | | |
|---|---------------|-------------|------------|---------------------------|-----------|---------------|---------------|--------------------|-------------|
| Release Verified: | \ | Verificatio | n Time: | | , | Release S | top Time: | | |
| | | | District: | | | V | Area: | | ~ |
| Area Supervisor: | | | | | | | | | |
| Address of Release | | | | | City: | | | | |
| Nearest City: | | | County: | | | Zip Code: | | | |
| DOT Jurisdiction: Note: Determine if the | release is fr | • | _ | ationing N nal asset w | | le or outside | a facility. | | |
| Caller's E-mail Addre | ss: | | | | V110 | Provide sp | elling of e-m | nail address. | |
| Pipeline Address: | _ | | | | | | , | | |
| Section | Township | | Range | | Milepost | | Tract# | | |
| Offshore 🔻 | | Latitude | | | Lor | ngitude | | | |
| Origin of Release: | | | | | | | | | |
| Owner of well site or | Leasehold v | where relea | se/spill | occurred: | | | | | |
| Cause (pre-investiga | tion) Check | all that ap | ply: | | | | | _ | |
| Third Party Damage | | Equipment | Failure [| | , | | Weld Failur | e 🗌 | |
| Internal Corrosion | | Other 🔲 | | | | Excavation | Damage | | |
| External Corrosion | | Incorrect O | peration - | - Contracto | r 🗌 | Intentional | Blowdown: | | |
| Natural Forces | | Incorrect O | peration | - Operator | | Maintenan | ce 🗌 No | on-Maintenai | nce 🗌 |
| Did water affect the r | elease in an | y way? | • | If Yes, | Explain: | | : | | |
| Temp |] | Relative H | lumidity | |] | Preci | pitation | | |
| Cloud Cover | ▼ | Wind Spe | ed | |] | Wind I | Direction | | |
| Injury 🔻 | Fire | • | Fatality | • | Explosion | _ | Unconsci | ousness | ~ |
| 3 or more Hospitalize | ed | ▼ | Significa | nt News | Coverage | - | | | |
| Incident Classificatio | n: | | | - | | | | osts associated wi | th clean-up |
| Environmental Conta | ct for releas | se: | | | • | • | | | |
| Safety Contact for th | is release: | | | | | ▼] | | | |
| Form completed by: | | | | | Completio | on Date: | | | |
| Latest revision date for form | | 05/06/03 | | | | | | | |
| Replaces previous revision | date . | 01/24/03 | | | | | | | |

APPENDIX B

NMOCD NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS AND BLOWDOWNS

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

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe. NM 87505 Form C-141 Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Attached

Santa Fe, NM 87505 Release Notification and Corrective Action OPERATOR Initial Report Final Report Name of Company Contact Address Telephone No. Facility Name Facility Type Mineral Owner Surface Owner Lease No. LOCATION OF RELEASE Unit Letter Feet from the North/South Line | Feet from the East/West Line / Section Township Range County Latitude Longitude_ NATURE OF RELEASE Volume Recovered Type of Release Volume of Release Source of Release Date and Hour of Occurrence Date and Hour of Discovery Was Immediate Notice Given? If YES, To Whom? ☐ Yes ☐ No ☐ Not Required By Whom? Date and Hour Was a Watercourse Reached? If YES, Volume Impacting the Watercourse. ☐ Yes ☐ No 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. OIL CONSERVATION DIVISION Signature: Approved by District Supervisor: Printed Name: Title: Approval Date: Expiration Date:

Conditions of Approval:

Phone:

E-mail Address:

^{*} Attach Additional Sheets If Necessary

APPENDIX C PUBLIC NOTICE

Cirrus Consulting, LLC

1254 East Greenfield Circle, Salt Lake City, UT 84121 Voice Line: (801) 266-1222 ideklau@cirrusllc.com

MEMORANDUM

To:

Clara Garcia

From:

Ingrid Deklau

Date:

October 22, 2004

Subject:

Public Notice Posting for Trunk L Compressor Station

Clara,

The New Mexico water quality regulations (20.6.2.3108 NMAC) require that each discharge plan renewal application include documentation of notification of the intent to submit the application to the Oil Conservation Division. This includes posting of the public notice "at a conspicuous public location, at or near the existing or proposed facility for 30 days." Please have the notice posted as appropriate. After posting, please complete the table below and email it back to me, so we can include it with the application.

Call me if you have any questions.

Posting Location

Date of Posting

11/9/04

Thanks,

Ingrid

PUBLIC NOTICE

Notice of Discharge Plan Renewal Application

Trunk L Compressor Station

Pursuant to the requirements of the New Mexico Water Quality Control Commission Regulation 20 NMAC 2.6.2 – <u>GROUND AND SURFACE WATER PROTECTION</u>, 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 Trunk L Compressor Station. Williams expects to submit the permit application to the Oil Conservation Division in November 2004.

The facility is located in Sections 21 and 22, Township 28 North, Range 5 West, in Rio Arriba County, approximately 4 miles south-southeast of Gobernador, New Mexico and 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 with secondary containment. 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 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 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.

NOTA PUBLICA

La nota de la Aplicación de la Renovación del Plan de la Descarga

Trunk L Compressor Station

Según los requisitos de la Regulación de la Comisión de Control de calidad de Agua de nuevo méxico 20 2.6.2 de NMAC – el SUELO Y la PROTECCION de AGUA de SUPERFICIE, Williams Field Service Company de 188 Camino de Condado 4900, Bloomfield, NM 87413, por la presente anuncian la intención para aplicar a la División de la Conservación del Petróleo de nuevo méxico para renovar el Plan de la Descarga para la Estación de Trunk L Compressor Station. William esperan someterse la aplicación del permiso a la División de la Conservación del Petróleo en novembre 2004.

La facilidad se localiza en Secciones 21 y 22, Municipio 28 al norte, la Gama 5 al oeste, en el Condado de Rio Arriba, aproximadamente 4 del sur-sudeste de millas de Gobernador, nuevo méxico y proporciona gas natural la compresión y condicionar los servicios.

Las direcciones del permiso de la descarga cómo rocian, los escapes, y otras descargas accidentales a la superficie se manejarán. La facilidad no descarga wastewater para surgir ni aguas subterráneas. Todo malgasta engendrado será almacenado temporalmente en tanques o contenedores con la contención secundaria. El desecho envió offsite se dispondrá o será reciclado en un OCD aprobó el sitio. En caso de una descarga accidental, molió agua muy probable no se afectará. La profundidad estimada de la agua del suelo en el sitio es 40 pies. El suma se disolvió la concentración de sólidos de agua de suelo de área se espera estar en la gama de 2.000 partes por millón.

Los comentarios o las indagaciones con respecto a este permiso o el proceso que permiten puede ser dirigido a: Director de la División de la Conservación del Petróleo 1220 Santo del sur Francis Dr. Fe de Santa NM 87505 (505) 827-1464

Refiérase por favor al nombre de la compañía y el nombre del sitio, como utilizado en esta nota, o mande una copia de esta nota al hacer las indagaciones, desde que el Departamento no podría haber recibido la aplicación en el tiempo de esta nota.



Four Corners Area Environmental Department #188 County Road 4900 Bloomfield, N.M. 87413 Phone: (505) 632-4606 Fax (505) 632-4781

October 22, 2004

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 Trunk L Compressor Station (GW-180). 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 October 2004.

The facility, located in Section 21 and 22, Township 28 North, Range 5 West, Rio Arriba County, New Mexico, approximately 4 miles south-southeast of Gobernador, 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 <u>does not</u> discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. 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 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 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 M. García

Environmental Compliance

| n | | | | | | | |
|---------|---|----|------|---------------------------------------|--|--|--|
| 7327 | U.S. Postal Servicem CERTIFIED MAIL. RECEIPT (Demestic Mail Only; No Insurance Governo Provided) For delivery information visit our website at www.uspa.com | | | | | | |
| 4595 | USE | | | | | | |
| | Postage | \$ | 0.37 | UNIT ID: 0012 | | | |
| 7000 | Certified Fee | | 2,30 | SLC Postmark C.C. | | | |
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| 1,160 | Restricted Delivery Fee (Endorsement Required) | | | 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | | | |
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| | PS (5071) 3800, Juine 200 | 2 | | »See Reverse (or Institutions | | | |



Track & Confirm

Current Status

You entered 7004 1160 0007 4595 7327

Your item was delivered on October 26, 2004 at 9:25am in FARMINGTON, NM 87401. Additional information for this item is stored in files offline. A proof of delivery record may be available through your local Post Office for a fee.

Restoration Options

▶ Restore Offline Item

What is this?





site map contact us government services
Copyright © 1999-2002 USPS. All Rights Reserved. Terms of Use Privacy Policy

Enter label number:

Track & Confirm FAQs (

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-180 WILLIAMS FIELD SERVICES, INC. TRUNK L COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (February 14, 2000)

· · ·

- 1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor stations with horsepower rating greater than 3000 horsepower. The renewal flat fee required for this facility is \$690.00 which 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 upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.
- 2. <u>Williams Field Services, Inc. Commitments:</u> Williams Field Services, Inc. will abide by all commitments submitted in the discharge plan renewal application letter dated November 11, 1999 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261.
- 4. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <u>Process Areas:</u> All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <u>Above Ground Saddle Tanks:</u> Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
- 8. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

Page 1 of 3

- 9. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds-per-square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 11. <u>Class V Wells</u>: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Storm Water Plan:</u> The facility will have an approved storm water run-off plan.

- 16. <u>Closure:</u> The OCD will be notified when operations of the Trunk L Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk L Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. <u>Certification:</u> Williams Field Services, Inc., by the officer whose signature appears below, <u>accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services, Inc. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.</u>

Accepted:

WILLIAMS FIELD SERVICES, INC.

by Sr. Enot'l Spec Title

State of New Mexico ERALS and NATURAL RESOURCES DE ENERGY. M Santa Fe, New Mexico 87505





February 21, 1995

CERTIFIED MAIL RETURN RECEIPT NO.P-176-012-113

Mr. H. Lee Bauerle Williams Field Services, Inc. P.O. Box 58900 Salt Lake City, Utah 84158-0900

RE: Discharge Plan GW-180

> Trunk "L" Compressor Station Rio Arriba County, New Mexico

Dear Mr. Bauerle:

The discharge plan GW-180 for Williams Field Services, Inc. Trunk "L" Compressor Station located in the NW/4 SW/4 of Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated October 28, 1994.

The discharge plan application 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 Sections 3-109.E and 3-109.F. which provide for possible future amendments or modifications of the plan. Please be advised the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface water, ground water, 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 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 require "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.

VILLAGRA BUILDING - 408 Galisteo

Forestry and Resources Conservation Division P.O. Box 1948 87504-1948 827-5830 Park and Recreation Division P.O. Box 1147 87504-1147 827-7465

2040 South Pacheco

Office of the Secretary 827-5950 **Administrative Services**

827-5925

Energy Conservation & Management 827-5900 Mining and Minerals

827-5970 Oil Conservation

827-7131

Mr. H. Lee Bauerle February 21, 1995 Page 2

Pursuant to Section 3-109.G.4., this plan is for a period of five (5) years. This approval will expire on February 21, 2000, and you should submit an application in ample time before this date.

The discharge plan application for the Williams Field Services, Inc. Trunk "L" Compressor Station is subject to WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat fee. There is no flat fee for compressor stations site rated less than 1000 horsepower.

The OCD has received your fifty dollar filing fee.

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

Sincerely,

William J. LeMay

Director

WJL/cee Attachment

cc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-180 APPROVAL WILLIAMS FIELD SERVICES, INC. TRUNK "L" COMPRESSOR STATION DISCHARGE PLAN REQUIREMENTS (FEBRUARY 21, 1995)

- 1. <u>Drum Storage:</u> All drums will be stored on pad and curb type containment.
- 2. <u>Sump Inspection:</u> All pre-existing sumps will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.
- 3. <u>Berms:</u> All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
- 4. <u>Pressure testing:</u> All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
- 5. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and appropriate district office pursuant to WQCC Rule 1-203 and OCD Rule 116.