GW - 181

PERMITS, RENEWALS, & MODS Application

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, October 28, 2009 11:29 AM
To: Sandoval, Monica; 'Bays, David'
Cc: VonGonten, Glenn, EMNRD; Perrin, Charlie, EMNRD; Powell, Brandon, EMNRD
Subject: GW-181 Trunk M CS, Admin. Complete
Attachments: GW-181 Admin Complete Letter.pdf; GW-181 Draft Permit Cover.pdf; GW-181 Draft Permit.pdf; GW-181OCD PN.pdf

Ms. Monica Sandoval

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

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/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 28, 2009

Dear Ms. Sandoval:

Re: Discharge Plan Renewal Permit GW-181
Williams Four Corners
Trunk M 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 September 3, 2009, to renew GW-181 for their Trunk M Compressor Station located in the NE/4 NE/4 of Section 29, Township 30 North, Range 6 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

Ms. Monica Sandoval
Williams Four Corners, LLC
188 CR 4900
Bloomfield NM 87413

Re: **DRAFT** Discharge Permit Renewal GW-181 Trunk M Compressor Station
NE/4 NE/4 of Section 29, Township 30 North, Range 6 West, NMPM
Rio Arriba County, New Mexico

Dear Mr. Dailey:

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

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

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. 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-181

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-181 (Discharge Permit) to Williams Four Corners (Owner/Operator), located 188 CR 4900, Bloomfield NM 87413, to operate Trunk M Gas Compressor Station located in the NE/4 NE/4 of Section 29, Township 30 North, Range 6 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 2756 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 20 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).

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

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

Owner/Operator, and the $1700.00 fee. This Discharge Permit will expire on **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 run-on and run-off plans and controls to separate chemical process areas and flow lines (contact areas) from storm water areas (non-contact areas), and shall comply with any additional commitments made in its approved Contingency Plan. The movement of storm water from a contact area to a non-contact area is a release, and the Owner/Operator shall report that release and take corrective action.

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

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

_____
Company Name - print name above

_____
Company Representative - print name

_____
Company Representative - Signature

Title_____

Date:_____

NOTICE OF PUBLICATION

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

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

(GW-181) Ms. Monica Sandoval, Environmental Compliance, Williams Four Corners, 188 CR 4900, Bloomfield NM, has submitted a renewal application for the previously approved discharge plan for their Trunk M compressor station, located in the NE/4 NE/4 of Section 29, Township 30 North, Range 6 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 2756 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 20 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

S E A L

Mark Fesmire, Director

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 9/1/09

or cash received on _____ in the amount of $ 1000.00

from W. Illanis Four Corners LLC

for GW-181

Submitted by: Lawrence Romero Date: 9/8/09

Submitted to ASD by: Lawrence Romero Date: 9/8/09

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

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

September 3, 2009

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

Re: Discharge Plan GW-181

Dear Sir:

Enclosed please find copies of Discharge Plan application renewal and check number 4027044917 for $100.00 to cover the filling fee for the following Williams Four Corners Trunk M Compressor Station GW- 181

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

Thank you,

Monica Sandoval
Environmental Compliance

Xc: FCA Environmental File 220

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Compressor Station (Trunk M Compressor Station, GW-181)

2. Operator: Williams Four Corners, LLC

Address: 188 CR 4900, Bloomfield, NM 87413

Contact Person: Monica Sandoval Phone: 505-632-4625

3. Location: NE/4 NE/4 Section 29 Township 30 North Range 6 West
Submit large scale topographic map showing exact location.

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

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

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

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

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

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

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

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

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

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

14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
Name: Monica Sandoval; Signature: Monica Sandoval Title: Environmental Specialist
E-mail Address: monica.sandoval@williams.com Date: _____

Trunk M Compressor Station

NMOCD Discharge Plan
GW-181 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 M Compressor Station is owned and operated by Williams Four Corners, LLC (Williams). The station was constructed in 1993 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 two reciprocating compressor engines (site-rated at 1378 horsepower each) and five 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	Monica Sandoval Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 632-4625

Item 3
Give a legal description of the location and county. Attach a large-scale topographic map.

Rio Arriba County, New Mexico
Township 30 North, Range 6 West, NE/4 NE/4 Section 29
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.

See information on-file at OCD. The facility plot plan has been updated and is included with this document as Figure 2. Modifications to the plot plan include the addition of dehydrators, tank location updates, and fenceline adjustment.

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.

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

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

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

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 water wells located within a 1-mile radius of the Trunk M 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 Frances Creek at an elevation of 6240 feet(2). 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)
29N; 6W; 28	3,2,3	0.75	SJ 00040	NOT	420	77-79, 285-291, 360-368	Drilled in 1953; shallow	No info available
29N; 6W; 28	3,2,3	0.75	SJ 00041	NOT	348	80-83, 263-283, 333-348	Drilled in 1953; Source: shallow	No info available

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

Note b: dom = domestic; unk=unknown; NOT=no use of right or point of diversion

References

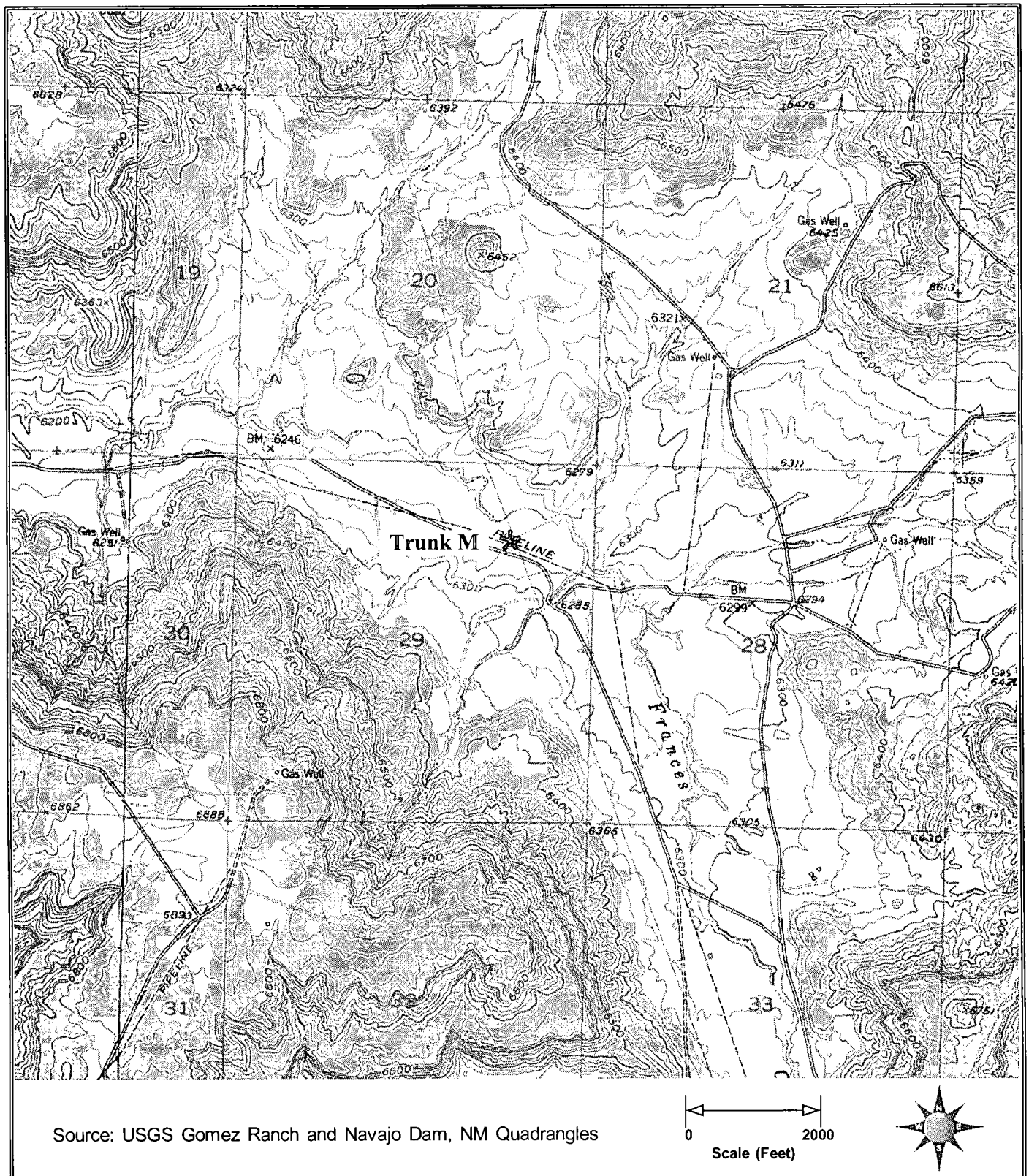
[1]Online Well Reports and Downloads, New Mexico Office of the State Engineer, search performed 7/28/2009.

[2]Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

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.



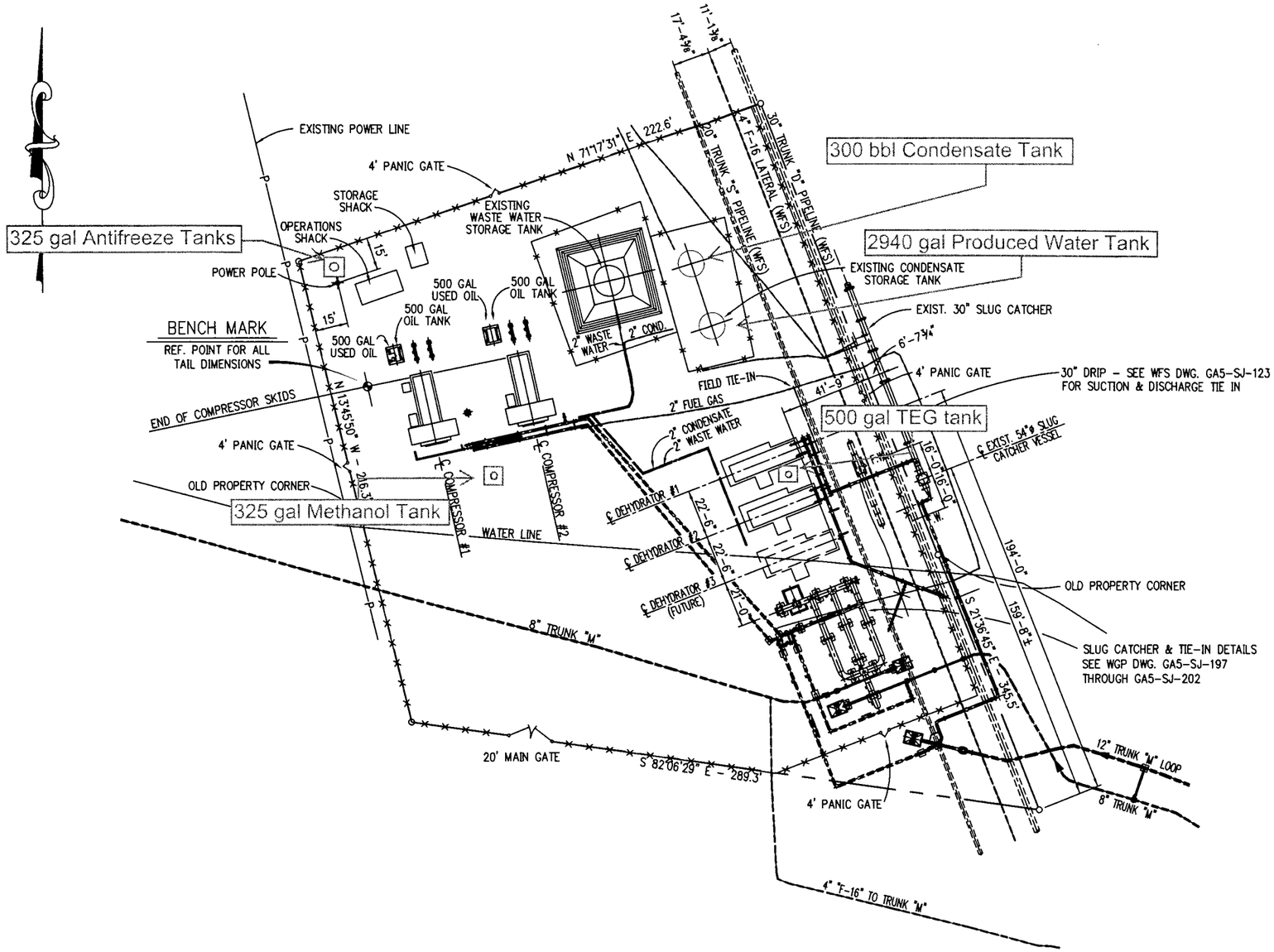
Source: USGS Gomez Ranch and Navajo Dam, NM Quadrangles

Figure 1 Site Vicinity / Topographic Map

Trunk M Compressor Station

Section 29, Township 30N Range 6W

Rio Arriba County, New Mexico



REVISED
AUGUST 11, 2009
DESTROY ALL PREVIOUS REVS.

NOTES:

DRAWING NO.	TITLE
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REFERENCE DRAWINGS

REV	DRAWN BY	DATE REVISED	CHECKED BY	PROJECT ENG.	APPROVED BY
4	P.HENDERSON	8/11/09	REVISED PER REDLINES FROM M. MC ANDREWS		
3	GST	6/13/07	AS-BUILT		
2	DDA	3/2/07	REVISED FOR DEHYDRATOR ADDITION		

REVISIONS

WILLIAMS MIDSTREAM GAS & LIQUIDS

TRUNK "M" COMPRESSOR STATION
PLOT PLAN

DRAWN BY	HFM	SCALE: 1"= 30'	A.F.E.:
CHECKED BY			
PROJECT ENGL			
APPROVED BY			
DATE ISSUED	11/18/94		

TKM-1-M1

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	AST	500 gal*	Metal tray and wastewater system	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Natural Gas Condensate/ Produced Water	AST	2940 gal	Lined 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.
Natural Gas Condensate	AST	300 bbl	Lined 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.
Waste Water/ Wash Down Water	AST	100 bbl	Lined vault	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.
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.
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.
Antifreeze	AST	325 gal	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol	AST Unit day tank	500 gal 100 gal*	Metal tank Day tank on dehy skid	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	AST	500 gal*	Metal tray and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol	AST	325 gal	Metal tank	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 Inlet Separator, Dehydrators, Condensate Tank	600-8000 bbl/year	May contain trace lube oil and/or glycol
Natural Gas Condensate	Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank	500-8000 bbl/year	No Additives
Waste Water/ Wash Down Water	Compressor and Dehy Skids; Process Areas; Condensate Tank	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
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

PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in September 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 NE/4, NE/4 of Section 29 Township 30 North, Range 6 West in Rio Arriba County, New Mexico. The facility, located approximately 22 miles east of Blanco, 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 in the range of 20 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-309 para su Quintana Mesa Compressor Station localizada en el NE/4, NE/4 de la Sección 29, Municipio 30 Norte, Recorren 6 Oeste en Rio Arriba County, New Mexico. La instalación, este de aproximadamente 272 millas localizado de Blanco, 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 20 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.

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-181) in September 2009. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations.

The facility, located in the NE/4, NE/4 Section 29, Township 30 North, Range 6 West, Rio Arriba County, New Mexico (BLM Grant NM101002), approximately 22 miles east of Blanco, 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 in the range of 20 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,

Monica Sandoval
Environmental Specialist

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-181
WILLIAMS FIELD SERVICES, INC.
TRUNK M COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(April 4, 2005)

1. Payment of Discharge Plan Fees: The $100.00 filing fee has been received by the OCD. There is a required flat fee equal to $400.00 for compressor station facilities with horsepower rating less than 1000 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 plan, with the first payment due upon receipt of this approval.

2. Williams Field Services Company Commitments: Williams Field Services Company will abide by all commitments submitted in the discharge plan renewal application dated February 7, 2005 and these conditions for approval.

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

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

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks 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. Underground Process/Wastewater Lines: 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 plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans 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. Housekeeping: 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. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.

14. Transfer of Discharge Plan: 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. Storm Water Permit: 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 M Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk M 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. Certification: 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

by Claudia Cardoza
Claudia Cardoza

Environmental Compliance
Title

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/20/05,

or cash received on ________ in the amount of $ 400.00

from Williams Field Services

for Trunk M C.S. GW-181

(Facility Name) (DP No.)

Submitted by: [signature] Date: 8/3/05

Submitted to ASD by: ________ Date: ________

Received in ASD by: ________ Date: ________

Filing Fee ____ New Facility ____ Renewal ✓

Modification ____ Other ________ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ____

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

Williams

WILLIAMS FIELD SERVICES COMPANY
PO Box 21218
Tulsa, OK 74121-1218
Customer Support 1-866-778-2665

JPMorgan Chase Bank N.A.
Chicago, IL

[illegible]

[redacted]

DATE 07/20/2005

PAY TO THE ORDER OF

PAY → $***********400.00 USD

NEW MEXICO OIL CONSERVATION DIV
WATER QUALITY MANAGEMENT FUND
2040 S PACHECO

SANTA FE NM 87505
UNITED STATES

[signature]
Authorized Signer

SUPPLIER NUMBER
403816

[redacted]

WILLIAMS FIELD SERVICES COMPANY
PO Box 21218
Tulsa, OK 74121-1218
Customer Support 1-866-778-2665

CHECK NUMBER	PAY DATE	SUPPLIER NO.	SUPPLIER NAME	TOTAL AMOUNT
[redacted]	07/20/2005	403816	NEW MEXICO OIL CONSERVATION DIV	**********400.00

INVOICE NUMBER	INV. DATE	INVOICE DESCRIPTION	NET AMOUNT
18-JUL-2005	20050718	OCD DISCHARGE PLAN RENEWAL FEES	400.00

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Compressor Station (Trunk M Compressor Station, GW-181)

2. Operator: Williams Field Services Company

   Address: 188 CR 4900, Bloomfield, NM 87413

   Contact Person: Clara Garcia Phone: 505-632-4606

3. Location: SW/4 NW/4 Section 29 Township 30 North Range 6 West
   Submit large scale topographic map showing exact location.

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

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

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

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

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

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

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

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

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

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

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

Name: Clara M. Garcia Title: Environmental Compliance

Signature: Clara M. Garcia Date: 2/7/2005

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

Trunk M
Compressor Station

NMOCD
Discharge Plan
GW-181

Williams Field Services
188 CR 4900
Bloomfield, NM 87413

Table of Contents

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1.0 TYPE OF OPERATION

The Trunk M Compressor Station was constructed in 1993 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 M. Garcia, Environmental Compliance
Phone and Address, Same as Above

3.0 LOCATION OF FACILITY

The facility is located in Section 29, Township 30 North, Range 6 West, in Rio Arriba County, New Mexico, approximately 28.5 miles east of Bloomfield, New Mexico. The facility latitude and longitude are North 36° 47.243,70' and West 107° 28.840,26'. A site location map is attached (USGS 7.5 Min. Quadrangles: Gomez Ranch and Navajo Dam, 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 two (2) 1378 site-rated hp engines and two (2) dehydrators. Currently, only (2) engines 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.

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.

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).

11.0 SITE CHARACTERISTICS

The Trunk M Compressor Station is located in the Frances Creek Valley. The site elevation is approximately 6260 feet above sea level. The natural ground surface topography slopes downward toward the north. The maximum relief over the site is approximately 10 feet. Site drainage is to the north. Intermittent flow from the site will follow natural drainage to the north into the Frances Creek drainage. Frances Creek drains west into the Navajo Lake. The Navajo Lake is the nearest down-gradient perennial source of surface water and is located approximately 3.0 miles west from the site, at an elevation of approximately 6,100 feet.

The site is underlain by quaternary alluvium which has been deposited over the sandstones and shales of the San Jose and Nacimiento Formation. These alluvial deposits are also the only identified down-gradient sources of ground water nearby the site. Ground water within these alluvial deposits flows toward Navajo Reservoir. The ground water in the alluvial deposits is expected to have a total dissolved solids (TDS) concentration of approximately 2,000 mg/l. In addition, in 1953 Phillips Petroleum drilled a well in Section 35, T30N, R6W which penetrated the Ojo-Alamo Sandstone and encountered water with a TDS concentration of 1,239 mg/l.

A review of the available hydrologic data(1) for this area revealed that the closest documented source of groundwater are the alluvial deposits of Frances Creek at an elevation of 6240 feet.

The nearest identified ground water wells(2) are owned by S.J. and J.C. Gomez in the SW/4; NE/4; SW/4 of Section 28, T30N, R 6W, approximately ¾ miles southeast of the site. The wells were drilled in 1953. S.J. Gomez's well (SJ00040) was drilled to a depth of 420 feet with water bearing stratifications identified at 77-79 feet; 285-291 feet; and 360-368 feet. J.C. Gomez's well (SJ00041) was drilled to a depth of 348 feet with water bearing stratifications identified at 80-83 feet; 263-283 feet; and 333-348 feet. No downgradient wells were identified within a one-mile radius of the site.

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

References

[1]Klausing, 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.

Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

[2]Online 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 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

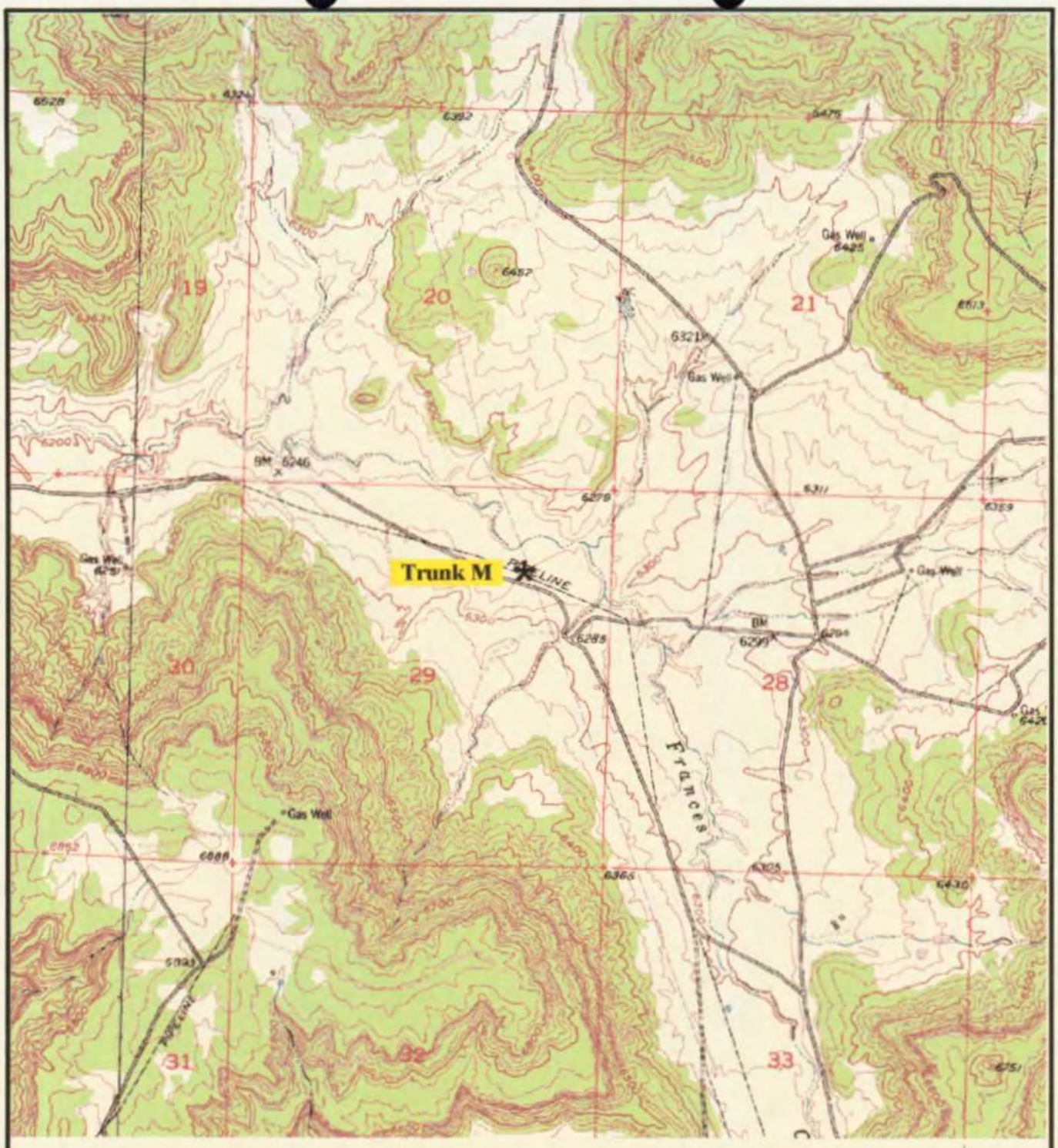
TABLE 1
SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS
TRUNK M COMPRESSOR STATION

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1,000-1,500 gallons/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	50-100 gallons/year/engine	No Additives
Condensate	Scrubber	500-1,000 barrels/year	No Additives
Produced Water	Gas Inlet Separator and Scrubber	600-1,500 barrels/year	May contain trace lube oil and/or glycol
Waste Water	Compressor Skid	500-1,500 gallons/year/engine	Biodegradable soap and tap water w/ traces of oil and glycol.
Used Process Filters	Air, Inlet and Glycol	75-100/year	No Additives
Used/Off-spec Glycol	Dehydrator	0-50 gal/year	No Additives
Used/Off-spec Antifreeze	Natural gas compression	0-200 gal/year	No Additives
Used/Off-spec Corrosion Inhibitor	Natural gas compression	0-200 gal/year	No Additives
Empty Drums/Containers	Liquid Containers	0-20/year	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 M 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	Metal tray 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.
Produced Water	Above Ground Storage Tank	1000 gal	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Produced Water	Above Ground Storage Tank	840 gal	Double wall tank with berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Condensate	Above Ground Storage Tank	300 bbl	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Waste Water	Above Ground Storage Tank	100 bbl	Concrete 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.
Spill Residue (i.e., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Glycol	Day Tank on unit	50 gal	Tank on dehy skid	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	500 gal tank for each engine	Metal tray and waste water system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Corrosion Inhibitor	Above Ground Storage Tank	325 gallons	Metal Tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	325 gallons	Metal Tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

FIGURES



Source: USGS Gomez Ranch and Navajo Dam, NM Quadrangles

Williams

Figure 1 Site Vicinity / Topographic Map

Trunk M Compressor Station

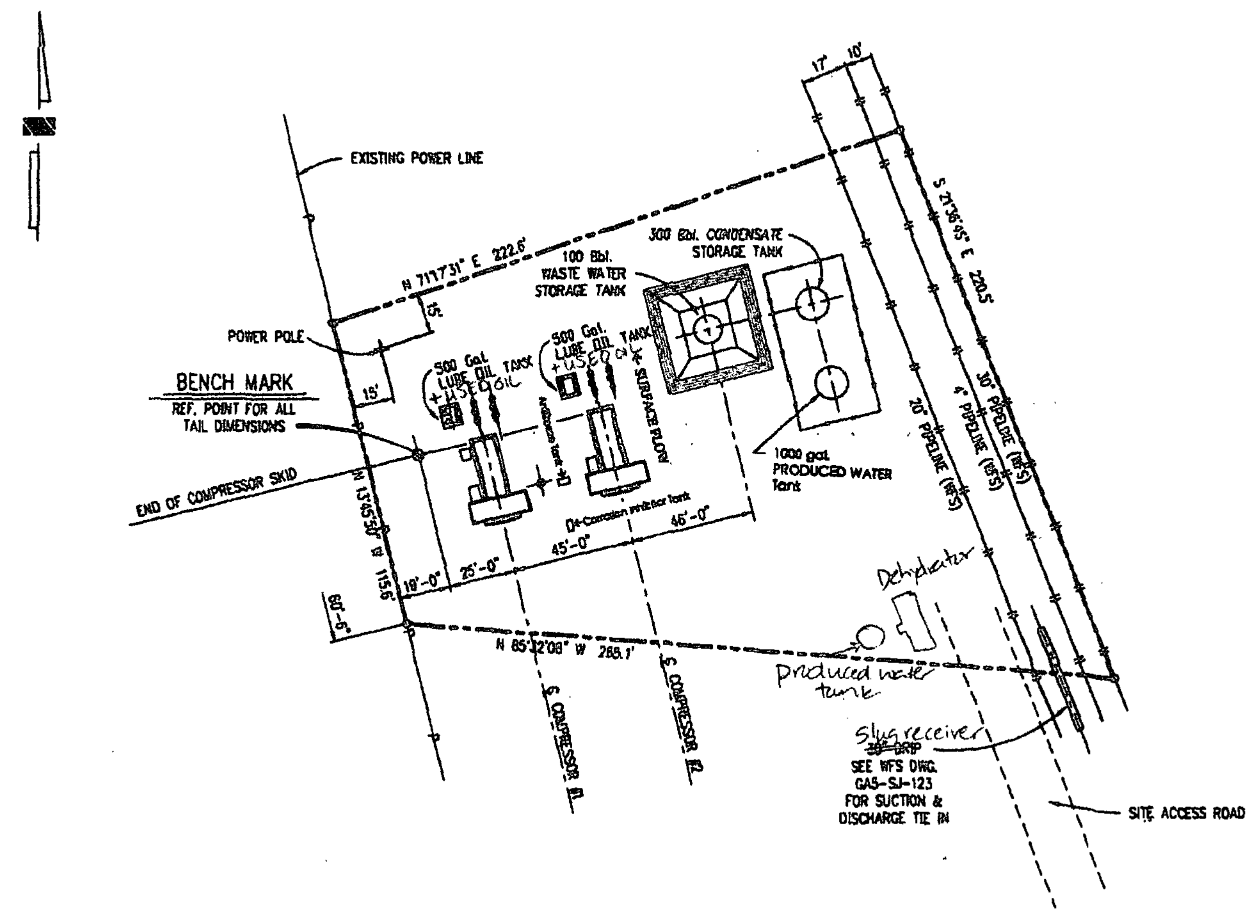
Section 29, Township 30N Range 6W

Rio Arriba County, New Mexico

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

OPERATIONS		
TRUCK "H" COMPRESSOR STATION		
SPILL PREVENTION CONTROL	13	4213(C)
10-10-93	0	3 of 8

ATTACHMENT "A" - PRODUCT & WASTE STORAGE LOCATIONS



DRAFTING	BY	DATE		WILLIAMS GAS PROCESSING
DRAWN BY				
CHECKED BY			TRUNK "H" COMPRESSOR STATION SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN PLOT PLAN	
APPROVED BY				
ENGINEER	BY	DATE		
			SCALE: 1" = 50'	DWG NO. TRKH-1-P6

REFERENCE DRAWINGS

REFERENCE DRAWINGS

REVISIONS

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

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 EMIS 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 EMIS tasks.

3.3.3 Maintain documentation required by the EMIS 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 6.04-ADM-002 - Release Reporting 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

5.0 LINKS

5.1 6.04-ADM-001 - Pollution Prevention and Control

5.2 6.04-ADM-002 - Release Reporting

5.3 EMIS

5.4 SIP Feedback/Change Request

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 WES-35 - 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)

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 6.04-ADM-002 - Release Reporting

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.

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<<<

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.

2.3.1.2 Any liquid release that causes a sheen.

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 WES-35 - 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 not occur in a Title E effected zone.

>>>End of Procedure<<<

WES Release Report Form

Call 3E at 1-888-67[redacted]2370 to report all releases (susp[redacted]ed or confirmed)

Is this a drill: | Type of Drill: | Williams

Release Reported by: | Report Time:

Please provide the correct spelling

Phone Number: | Job Title:

Date Release Occurred:

Month | Day | Year | State

Product Released:

Released to:

Define Other:

Estimated Released	0	(a)
Estimated Free Liquids Recovered	0	(b)
Estimated Amount Recovered Soil	0	(c)
Estimated Total Amount Recovered	0	(b+c)
Estimated Amount Not Recovered	0	(a-b-c)

Note: For a release to be contained inside of a "dike" it must be a permanent dike designed specifically to contain releases.

Release Reportable? | Waterway Affected? | Name

3E should inform the regulatory agencies listed below, that Emergency Response is not required.

Report	Date	Number	Time	Name	Title	City	State
NRC ☐							
SERC ☐							
3E Only	Was a written report requested?		Time Frame		Days		
TNRCC ☐							
3E Only	If a written report is requested, do not provide it. Contact Environmental Specialist.						
LEPC ☐							
Other ☐							

Business Unit | Asset Group

Inside Facility Boundary? | Facility Type:

Facility Asset: ☐ | Facility Name:

OR

Pipeline Asset: ☐ | Pipeline Name: | Pipe Type:

3E can search the data base by: Pipeline, Terminal, Station, Receipt Facility or Delivery Point.

Note: Check "Pipeline Asset" if release occurs on a pipeline outside the facility boundary. Breakout Tank?

Incident Summary:

WES Release Report Form

Call 3E at 1-888-677-[redacted]370 to report all releases (suspe[redacted]ed or confirmed)

Release Discovered by: _____ Discover Time _____

Release Verified: ☐ Verification Time: _____ Release Stop Time: _____

District: _____ Area: _____

Area Supervisor: _____

Address of Release _____ City: _____

Nearest City: _____ County: _____ Zip Code: _____

DOT Jurisdiction: ☐ Engineering Stationing Number: _____

Note: Determine if the release is from a DOT Jurisdictional asset whether inside or outside a facility.

Caller's E-mail Address: _____ Provide spelling of e-mail address.

Pipeline Address:

Section _____ Township _____ Range _____ Milepost _____ Tract # _____

Offshore ☐ Latitude _____ Longitude _____

Origin of Release: _____

Owner of well site or Leasehold where release/spill occurred: _____

Cause (pre-investigation) Check all that apply:

Third Party Damage ☐	Equipment Failure ☐	Material or Weld Failure ☐
Internal Corrosion ☐	Other ☐ _____	Excavation Damage ☐
External Corrosion ☐	Incorrect Operation - Contractor ☐	Intentional Blowdown: ☐
Natural Forces ☐	Incorrect Operation - Operator ☐	*Maintenance* ☐ *Non-Maintenance* ☐

Did water affect the release in any way? ☐ If Yes, Explain: _____

Temp _____ Relative Humidity _____ Precipitation _____

Cloud Cover ☐ Wind Speed _____ Wind Direction _____

Injury ☐ Fire ☐ Fatality ☐ Explosion ☐ Unconsciousness ☐

3 or more Hospitalized ☐ Significant News Coverage ☐

Incident Classification: _____ Loss/Damage Estimate: _____

Loss and damage estimate should include all costs associated with clean-up (maintenance, clean-up, product loss).

Environmental Contact for release: _____

Safety Contact for this release: _____

Form completed by: _____ Completion 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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name of Company	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

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

Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
E-mail Address:	Conditions of Approval:	Attached ☐
Date: Phone:		

* 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 M 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
Facility	11/9/04

Thanks,

Ingrid

PUBLIC NOTICE

Notice of Discharge Plan Renewal Application

Trunk M Compressor Station

Pursuant to the requirements of the New Mexico Water Quality Control Commission Regulation 20 NMAC 2.6.2 – GROUND AND SURFACE WATER PROTECTION, Williams Field Services Company of 188 County Road 4900, Bloomfield, NM 87413, hereby announces intent to apply to the New Mexico Oil Conservation Division to renew the Discharge Plan for the Trunk M Compressor Station. Williams expects to submit the permit application to the Oil Conservation Division in November 2004.

The facility is located in Section 29, Township 30 North, Range 6 West, in Rio Arriba County, approximately 28.5 miles east of Bloomfield, 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 20 feet. The total dissolved solids concentration of area ground water is expected to range from 1,000 to 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 M 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 Trunk M 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 la Sección 29, Municipio 30 al norte, la Gama 6 al oeste, en el Condado de Rio Arriba, aproximadamente 28,5 este de millas de Bloomfield, 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 20 pies. El suma se disolvió la concentración de sólidos de agua de suelo de área se espera recorrer de 1.000 a 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.

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-181
WILLIAMS FIELD SERVICES, INC.
TRUNK M 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 between 1000 and 3000 horsepower. The renewal flat fee required for this facility is $345.00 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. Williams Field Services, Inc. Commitments: Williams Field Services, Inc. will abide by all commitments submitted in the discharge plan renewal application letter dated November 30, 1999 and these conditions for approval.

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

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

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks 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. Underground Process/Wastewater Lines: 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. Class V Wells: 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. Housekeeping: 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. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.

14. Transfer of Discharge Plan: 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. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the Trunk M Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk M 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. Certification: Williams Field Services, Inc., by the officer whose signature appears below, 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.

Accepted:

WILLIAMS FIELD SERVICES, INC.

by _____
Sr. Envtl Spec
Title

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

February 21, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.P-176-012-114

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

RE: Discharge Plan GW-181
Trunk "M" Compressor Station
San Juan County, New Mexico

Dear Mr. Bauerle:

The discharge plan GW-181 for Williams Field Services, Inc. Trunk "M" Compressor Station located in the SE/4 NE/4 of Section 29, Township 30 North, Range 6 West, NMPM, San Juan 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.

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 "M" 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-181 APPROVAL
WILLIAMS FIELD SERVICES, INC.
TRUNK "M" COMPRESSOR STATION
DISCHARGE PLAN REQUIREMENTS
(FEBRUARY 21, 1995)

1. Drum Storage: All drums will be stored on pad and curb type containment.

2. Sump Inspection: 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. Berms: 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. Pressure testing: 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.