GW - 187

GENERAL CORRESPONDENCE

YEAR(S):

2006 - 1995

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2007 NOV 13 AM 11 55

Williams

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

November 7, 2007

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

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

Dear Mr. Lowe,

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

More specifically, the updates to Table 1 include replacing language that stated waste would be disposed at a "NMOCD-approved" or simply "approved" disposal facility with text that states waste will be disposed at "any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste." Recently, Williams has had some difficulty using NMED-approved disposal sites due to the current language.

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

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

Five Points (GW-078)
29-6#2 (GW-121)
29-6#3 (GW-198)
29-6#4 (GS-122)
30-5 (GW-108)
31-6 (GW-118)
32-7 (GW-117)
32-8#2 (GW-111)
32-8#3 (GW-116)
32-9 (GW-091)
Aztec (GW-155)
Blanco (GW-327)
Cabresto (GW-352)
Carracas (GW-112)
Cedar Hill (GW-087)
Chaco (GW-331)
Coyote (GW-250)
Crouch Mesa (GW-129)
Culpepper (GW-353)
Decker Junction (GW-134)
Dogie (GW-330)
El Cedro (GW-149)
Glade (GW-321)
Hare (GW-343)
Honolulu (GW-315)
Horse Canyon (GW-061)
Horton (GW-323)
Kernaghan (GW-271)
La Cosa (GW-187)
Laguna Seca (GW-307)
La Jara (GW-223)
Lateral N-30 (GW-256)
Lawson Straddle (GW-322)
Lybrook (GW-047)
Manzanares (GW-062)
Martinez (GW-308)
Middle Mesa (GW-064)
Milagro (GW-060)
Navajo (GW-182)
North Crandell (GW-310)
Pipkin (GW-120)
Pritchard (GW-274)
Pump Mesa (GW-063)
Quintana Mesa (GW-309)
Richardson (GW-320)
Sims Mesa (GW-068)
Snowshoe (GW-287)
Thompson (GW-328)
Trunk A (GW-248)
Trunk B (GW-249)
Trunk C (GW-257)
Trunk L (GW-180)
Trunk M (GW-181)
Trunk N (GW-306)
Wildhorse (GW-079)

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

Respectfully submitted,

David Bays
Senior Environmental Specialist

Attachment

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	500 gal*	Berm or concrete pad and wastewater system	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Produced Water/Natural Gas Condensate	Above Ground Storage Tank	300 bbl 120 bbl 40 bbl	Berms	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at **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.**
Wash-down Water	Below Grade Sump, vaulted	70 bbl 45 bbl	Dual-walled tanks	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to **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 that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste.**
Used Oil Filters	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at 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.
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	Non - exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank		Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	500 gal* 125 gal* 100 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	500 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

*Number of tanks installed dependent on number of engines and dehydrators installed on site. Engines and dehydrators are installed or removed to meet demand.

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Produced Water/Natural Gas Condensate	**Inlet Scrubber, Gas Inlet Separator, Dehydrators**	2000-8000 bbl/year	No Additives
Waste Water /Wash Down Water	Compressor and Dehy Skids	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	50-500/year/engine	No Additives
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

2006 AUG 23 AM 11 44

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

August 22, 2006

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

Re: Change of Company Name

Dear Mr. Price;

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

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

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

Sincerely,

David Bays
Senior Environmental Specialist

Attachments

xc: Clara Cardoza
Monica Sandoval
WFS FCA file 210

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

October 4, 2005

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

Re: Discharge Plan GW-198, GW-187, GW-321, GW-323, GW-322 and GW-320
Application Renewal and Filing
Fees

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan permit renewals for the following Williams Field Services (WFS) Compressor Stations:

- **29-6#3 (GW-198)**
- **La Cosa (GW-187)**
- **Glade (GW-321)**
- **Horton (GW-323)**
- **Lawson(GW-322)**
- **Richardson (GW-320)**

Check number 4027004660 in the amount of $600.00 was previously submitted to cover the filing fees. Williams Field Services appreciates your assistance in handling these applications and fees. If you have any questions or require additional information, please contact me at 505/632/4625.

Thank you,

Monica Sandoval

Monica Sandoval
Environmental Compliance

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

AFFIDAVIT OF PUBLICATION

Ad No. 52023

STATE OF NEW MEXICO
County of San Juan:

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

Monday, July 25, 2005.

And the cost of the publication is $168.46.

Connie Pruitt

ON 7/25/05 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Wynell Corey

My Commission Expires November 17, 2008.

COPY OF PUBLICATION

918 Legals

NOTICE OF PUBLICATION

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

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

(GW-187) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their La Cosa compressor station located in the NE/4 NW/4, Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water and waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in above ground, closed-top steel tanks prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-198) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their 29-6 #3 Compressor Station located in the NW/4 NE/4, Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Up to 3,000 barrels of produced water is generated on site and collected in containment vessels prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 140 to 640 feet with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-218) – Dawn Trucking Corporation, Mr. Barry Bond, (505) 327-6314, P.O. Box 1498, Farmington, New Mexico 87499-1498, has submitted a discharge renewal application for the Farmington facility located in the SW/4 NW/4, Section 19, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal in an OCD approved facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 1,575 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-320) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Richardson Straddle compressor station located in the SW/4 NE/4, Section 27, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in above ground, in a closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 110 to 180 feet with a total dissolved solids concentrations ranging from approximately 450 mg/l to 2400 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-321) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Glade compressor station located in the NW/4 SW/4, Section 30, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of 40 feet with o total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-322) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Lawson compressor station located in the SE/4 SW/4, Section 36, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills,

leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of 51 feet with a total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-323) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Horton compressor station located in the SE/4 SE/4, Section 10, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge ranges in depth from 90 feet to 115 feet with a total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 18th day of July 2005.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

MARK FEISMIER, P.E., Director

Legal No. 52023 published in The Daily Times, Farmington, New Mexico on Monday, July 25, 2005.

NOTICE OF PUBLICATION

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

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

(GW-187) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their La Cosa compressor station located in the NE/4 NW/4, Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water and waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in above ground, closed-top steel tanks prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-203)-Baker Hughes Petrolite (formerly Petrolite Corporation), Mr. Roy Young, 10520 West I-20 East, Odessa, Texas 79765, has submitted a Discharge Permit Renewal Application for their Hobbs Facility located in the NE/4, Section 7, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top receptacle and transported off-site for disposal at an OCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 100 mg/L. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-204)-Baker Hughes Petrolite (formerly Petrolite Corporation), Mr. Roy Young, 10520 West I-20 East, Odessa, Texas 79765, has submitted a Discharge Permit Renewal Application for their Artesia Facility located in the SE/4, Section 33, Township 16 South, Range 26 East, NMPM, Eddy County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top receptacle and transported off-site for disposal at an OCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 15 feet with a total dissolved solids concentration of approximately 2160 mg/L. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-205) - Corrosion. Ltd., Mr. Tommie Farrell, P.O. Box 5097, Hobbs, New Mexico 88241-5097, has submitted a discharge plan renewal application for their Hobbs Service Facility located in the SW/4 NE/4, Section 4, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle face will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentrations of approximately 712 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-218) - Dawn Trucking Corporation, Mr. Barry Bond, (505) 327-6314, P.O. Box 1498, Farmington, New Mexico 87499-1498, has submitted a discharge renewal application for the Farmington facility located in the SW/4 NW/4, Section 19, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal in an OCD approved facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 1,575 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-320) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Richardson Straddle compressor station located in the SW/4 NE/4, Section 27, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in above ground, in a closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 110 to 180 feet with a total dissolved solids concentrations ranging from approximately 450 mg/l to 2400 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-321) - Williams Field Services, Inc., David Bays, Senior En- ted a discharge permit renewal application for their Lawson compressor station located in the SE/4 SW/4, Section 36, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of 51 feet with a total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-323) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Horton compressor station located in the SE/4 SE/4, Section 10, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge ranges in depth from 90 feet to 115 feet with a total dissolved solids concentrations ranging from approximately 200 mg/l to 2000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

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

La Cosa Compressor Station

NMOCD
Discharge Plan
GW-187

Williams Field Services
188 CR 4900
Bloomfield, NM 87413

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1.0 TYPE OF OPERATION

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

2.0 LEGALLY RESPONSIBLE PARTY

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

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

3.0 LOCATION OF FACILITY

The facility is located in Section 34, Township 29 North, Range 11 West, in San Juan County, New Mexico, approximately 1.6 miles south of Bloomfield, New Mexico. The facility latitude and longitude are North 36° 41.275,98' and West 107° 58.737,66'. A site location map is attached (USGS 7.5 Min. Quadrangles: Bloomfield, New Mexico) as Figure 1.

4.0 LANDOWNER

Williams owns the subject property.

Williams
PO Box 2400
Tulsa, OK 74101
918-573-2000

5.0 FACILITY DESCRIPTION

This facility is a field compressor station and is un-manned. The site has been permitted to allow operation of four 1408 site-rated hp engines and one 2980 site-rated hp engine. Currently, only engine 1408 hp engine and one 2980 hp engine exist at the site. Compressors 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, engine coolant and waste water. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

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

Barring facility modification and/or process changes, the classification of non-exempt wastes by laboratory analyses will be made once during the approval period of this plan. Subsequent laboratory analyses will be performed at the generator's discretion (minimum of once every five years), or more frequently to comply with waste acceptance procedures of the disposal facility.

8.0 STORM WATER PLAN

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

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

8.1 Site Assessment and Facility Controls

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

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

8.2 Best Management Practices

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

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

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

9.0 INSPECTION, MAINTENANCE AND REPORTING

Williams personnel will operate and maintain the 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 Release Reporting and Pollution Prevention and Control are included in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).

11.0 SITE CHARACTERISTICS

The La Cosa Compressor Station is located on the mesa south of Bloomfield, NM. The site elevation is approximately 5,600 feet above mean sea level. The natural ground surface topography slopes downward towards the San Juan River, approximately 0.9 miles to the north. The maximum relief over the site is approximately 10 feet. Intermittent flow from the site will follow natural drainage to the east and then follow an unnamed ephemeral stream channel to the north towards the San Juan River. The San Juan River, at approximately 5,410 feet in elevation, is the nearest down-gradient perennial source of surface water to the site.

A review of the available hydrologic data (1,2) for this area revealed that there are six water wells within a 1/2-mile radius of the La Cosa Compressor Station. Five of the wells are shallow, with depth to water ranging between 6 and 34 feet. Two of the wells are used for domestic purposes. The total dissolved solids concentration of area ground water is expected to range from 200 to 2000 parts per million.

The table below presents available information provided for each of the six wells.

Township; Range; Section	Quarter[a]	Apx. Distance from Site (mi)	Well #	Use[b]	Well Depth (ft)	Water Bearing Stratifications (ft)	Description	Depth to Water (ft)
29N; 11W; 27	133	0.25-0.5	SJ 00700	dom	20	10-20	shallow alluvium/basin fill	7
29N; 11W; 27	243	0.25-0.5	SJ 01808 0-2	pol	27	19-25	sandstone/gravel/conglomerate	19
29N; 11W; 27	244	0.25-0.5	SJ 01808 0-3	pol	39	35-35	sandstone/gravel/conglomerate	34
29N; 11W; 27	233	0.25-0.5	SJ 01808 0-4	pol	32	24-30	sandstone/gravel/conglomerate	25
29N; 11W; 27	114	0.25-0.5	SJ 02227	dom	27	18-25	shallow alluvium/basin fill	6
29N; 11W; 34	4144	0.5+	---	---	800	---	Ojo Alamo Sandstone	---

Note a: 1=NW/4; 2=NE/4; 3=SW/4; 4=SE/4
Note b: dom = domestic; pol = pollution control well

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

References

[1]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, 2005.

12.0 FACILITY CLOSURE PLAN

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

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

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

TABLES

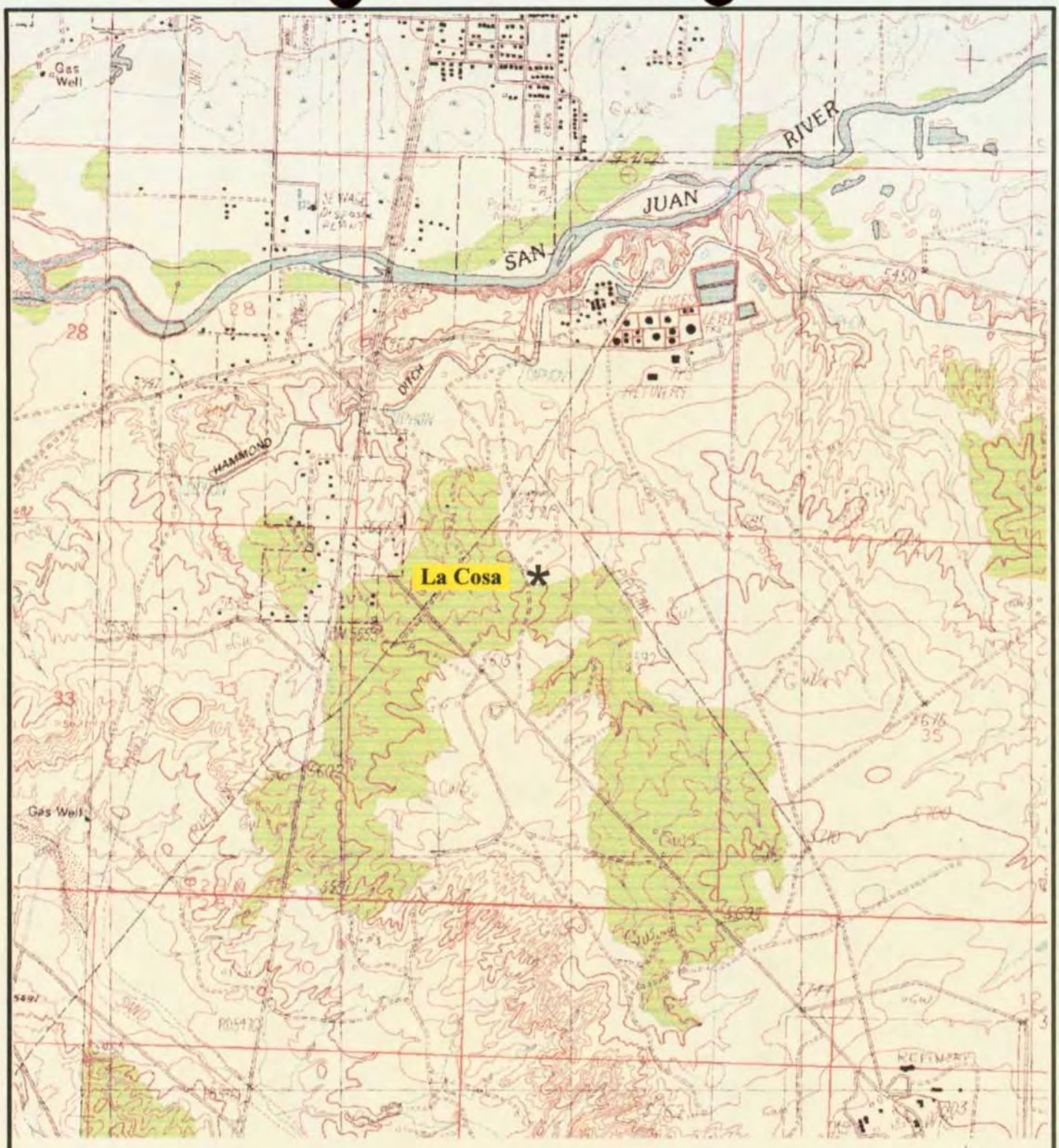
TABLE 1
SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS
LA COSA COMPRESSOR STATION

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	100-500 gallons/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	20-60/year/engine	No Additives
Condensate/Produced Water	Scrubber	200-3000 barrels/year	No Additives
Waste Water	Compressor Skid	500-3000 gallons/year/engine	Biodegradable soap and tap water w/ traces of oil
Used Process Filters	Air	25-100/year	No Additives
Empty Drums/Containers	Liquid Containers	0-20/year	No Additives
Used/Off-spec Antifreeze	Natural gas compression	0-200 gal/year	No Additives
Used/Off-spec Ambitrol	Natural gas compression	0-200 gal/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
LA COSA COMPRESSOR STATION

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil*	Above Ground Storage Tank	(1) 500 gal; (1) 200 gal; (1) 55 gal	Metal tank or Concrete Pad and Waste Water System	Non-exempt	Transported to a Williams or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Condensate/Produced Water	Above Ground Storage Tank	2940 gal	Earthen 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	740 gal	Dual-walled	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.
Ambitrol Tank	Above Ground Storage Tank	500 gal	Concrete Pad and Waste Water System	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Antifreeze Tank	Above Ground Storage Tank	300 gal	Concrete Pad and Waste Water System	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil*	Above Ground Storage Tank	500 gal tank for each engine	Concrete Pad and Waste Water System	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

FIGURES



Source: USGS Bloomfield and Horn Canyon, NM Quadrangles

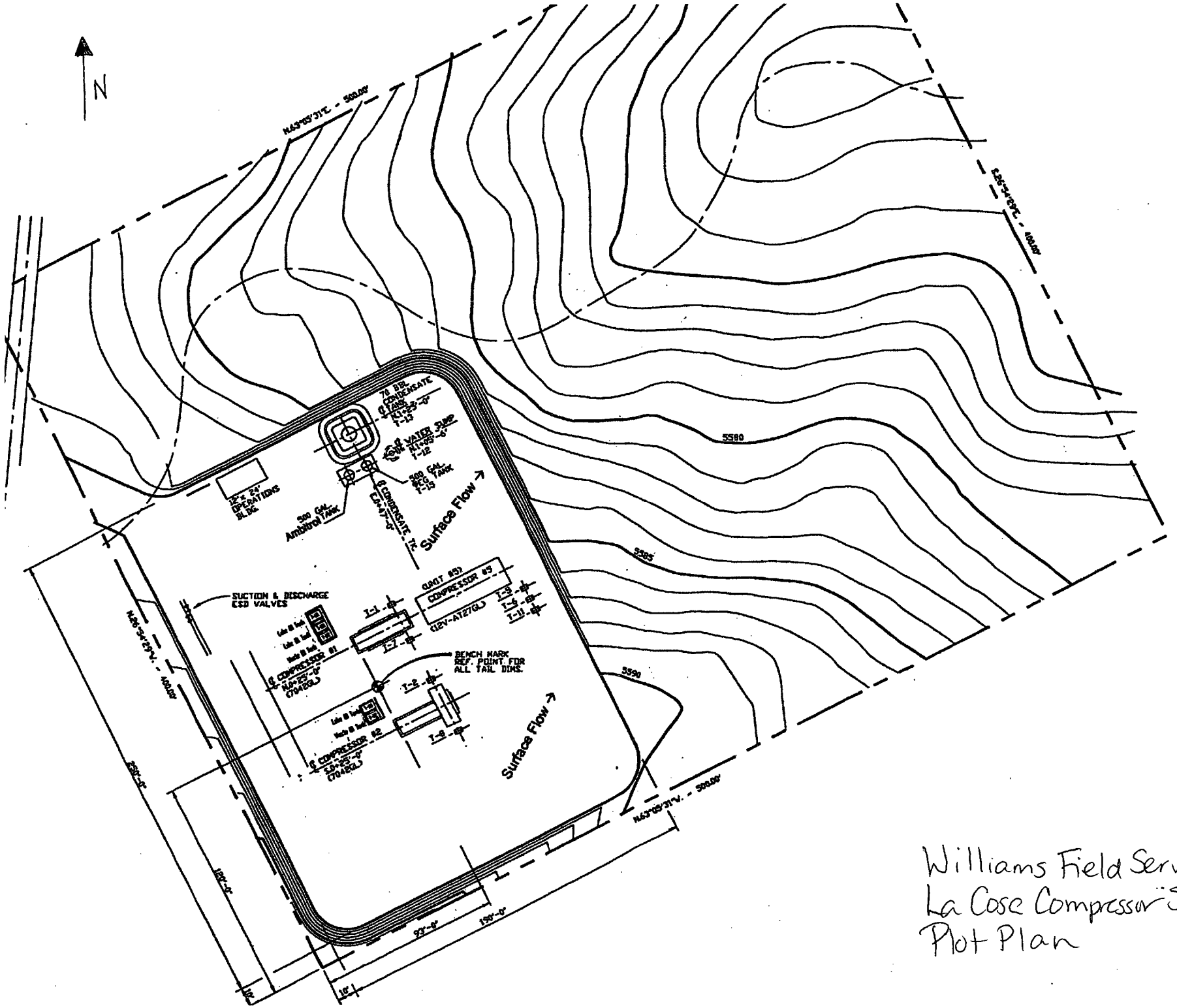
Williams

Figure 1 Site Vicinity / Topographic Map

La Cosa Compressor Station

Sections 34, Township 29N Range 11W

San Juan County, New Mexico



Williams Field Services
La Cosa Compressor Station
Plot Plan

APPENDICES

Appendix A
WFS 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

Release/Spill Report Form

Month | Day | Year

Release Verification Time: | Release Stop Time:

Region | District | Area

Location Name | Location Identifier

Mainline Name | Mainline Identifier

Area Manager | Company Asset | State

Address | County | Zip Code

Release Discovered by: | Time

Release Reported by: | Time

Section | Township | Range | Milepost | Tract #

Offshore | Latitude | Longitude

Release Reportable? | Waterway Affected? | Name

Report	Date	Number	Time	Name	Title	City	State
NRC ☐							
SERC ☐							
LEPC ☐							
TRRC ☐							
EPA ☐							
Other ☐							

Product Released: | Total BBL's Released | 0

BBL's Recovered Wet | 0

Cause of Release: | BBL's Recovered Soil | 0

Total BBL's Recovered | 0

Released To: | Other: | BBL's Not Recovered | 0

Remarks:

Origin Of Release:

Temperature | Relative Humidity | Precipitation

Cloud Cover | Wind Speed | Wind Direction

Injury | Death | Fire | Explosion

Unconsciousness | Hospitalization

Loss/Damage Estimate

Incident Investigator:

Environmental Contact for this Release:

Safety Contact for this Release:

Compliance Administrator for this area:

Form completed by:

Completion Date:

Form was e-mailed to Williams on:

1.0 PURPOSE

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

Note 1:

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

Note 2:

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

2.0 PROCEDURE

2.1 Offshore Release Reporting (w/sheen on water)

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

2.1.1.1 Any release that causes sheen on water.

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

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

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

2.2.1.1 Any Gas release >50 MSCF;

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

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

2.2.1.4 Any unintentional, non-maintenance related release ≥5 gallons of a Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;

2.2.1.5 Any release of Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or

2.2.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.3.2.1 through 2.3.1.6.

2.2.2 The Environmental Specialist and the DOT Compliance Coordinator will determine reportability and, if required, perform telephonic notifications in accordance with applicable regulations.

2.2.3 The Environmental Specialist will complete the WES - 35 Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 10 working days.

2.2.4 The Environmental Specialist will complete any required follow-up written reports and/or documentation for non-transportation events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.

2.2.5 The DOT Compliance Coordinator will complete any required follow-up reports and/or documentation for transportation related events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.

2.3 Onshore Releases

2.3.1 Immediately report to 3E Company at 888-677-2370 (toll free) the following type(s) of onshore release(s) or event(s):

2.3.1.1 Any liquid release that enters, or is expected to enter, any waterway (i.e., ditch, arroyo, intermittent stream, etc.);

2.3.1.2 Any individual liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) >1 gallon;

2.3.1.3 Any cumulative liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) >5 gallons within a 24-hour period (drips, pinhole leaks, etc.). (NOTE: Report immediately upon determining, or suspecting that the 5 gallon/24 hour threshold will be met or exceeded);

2.3.1.4 Any Gas release >50 MSCF;

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

2.3.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or hazardous liquids lost and/or, costs of clean up or recovery of the operator **and/or** others ≥ $50,000;

2.3.1.7 Any unintentional, non-maintenance related release ≥5 gallons of a hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;

2.3.1.8 Any release of hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or

2.3.1.9 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.4.1.1 through 2.4.1.8.

2.3.2 3E Company will immediately make the required telephonic notifications in accordance with the Telephonic and Written Release Reporting Requirements.

2.3.3 Information that will be needed when reporting to 3E is on WES-35 - Release Report Form.

2.3.4 Refer to the Onshore Release/Spill Notification Flowchart for more information regarding the onshore reporting workflow.

2.3.5 The Environmental Specialist will follow-up with Operations to verify that adequate response and reporting measures have been taken for each release and track closure of each release report with appropriate regulatory agencies.

Note:

Flares and Thermal Oxidizers

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

2.4 Planned / Scheduled Blowdowns

2.4.1 Notify your Environmental Specialist as far as possible in advance of planned / scheduled blowdowns that are not an exception per 2.5 of this procedure.

2.4.2 Be prepared to provide to your Environmental Specialist a current extended chromatographic analysis of the product to be released.

2.4.3 The Environmental Specialist will:

2.4.3.1 Review information provided;

2.4.3.2 Notify appropriate agencies;

2.4.3.3 Obtain required permits or permissions;

2.4.3.4 Provide Operations with any special conditions and / or limitations to be observed before, during, and/or after the planned / scheduled blowdown event; and

2.4.3.5 Perform any required post event reporting or follow-up to agencies.

2.5 Exceptions to Procedure:

2.5.1 Sheen on rainwater within facilities, dikes, valve boxes, etc.. that is not the result of a release event. However, one must follow proper disposal and housekeeping practices for these cases.

2.5.2 Routine releases to pollution control devices (flares, thermal oxidizers, etc.) **in accordance with permit conditions or limitations.**

2.5.3 Site-specific procedures may qualify as an exception, if reviewed and approved by your Environmental Specialist.

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

2.5.1 Within 45 days of any release that affected soil or water, Operations will submit to the Environmental Specialist the following information:

2.5.1.1 Quantity of soil, water, or product removed as a result of a release;

2.5.1.2 Disposition of soil, water, or product removed (i.e., land, farm, landfill, disposal, etc.);

2.5.1.3 Update of costs incurred because of release. (Includes value of lost product, repair costs response costs, clean up costs, disposal costs, etc.)

2.5.1.4 Environmental Specialist will update release database with additional information from 2.5.1.1 through 2.5.1.3.

2.6 Release Database

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

3.0 REFERENCES

3.1 Regulatory

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

3.1.2 49 CFR 191, 192 and 195

3.2 Related Policies/Procedures

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

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

4.0 DEFINITIONS

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

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

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

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

4.5 **Onshore Release** - Any release that does not occur offshore in a Tidally Affected Zone.

4.6 **Tidally Affected Zone** - Relating to or affected by tides: *the tidal maximum; tidal pools; tidal waters.*

4.7 **DOT jurisdictional Pipeline or Pipeline Facility** – Pipeline or pipeline facility subject to 49 CFR Parts192 or 195.

4.8 **Hazardous Liquid** – Per 49 CFR 195.2 - petroleum, petroleum products, or anhydrous ammonia.

➢➢➢End of Procedure≺≺≺

System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
01/20/03		Added link to Onshore Release/Spill Notification Flowchart
	2.0	Deleted Scope
	3.1	**Deleted** "Certain Company operated assets can be the source of hydrocarbon or other fluid releases or atmospheric releases into the environment. Although we can learn much about our assets and operating practices by tracking all releases, the procedure below has been developed so that the Company can allocate its resources most appropriately. However, every spill situation is different: If there is a realistic risk of exposure to the public, livestock, the soil or ground water, the event and condition must be reported. **Proper reporting ensures a proper response.**" **Added** "This procedure applies to liquid and gas releases"
	3.2	Deleted "direct the administration of all Release reporting in their area and provide the following:"
	3.2 bullet	Deleted "Provide reportable release volumes to Operations, as requested, for common routine, intentional, maintenance blow-down events." Deleted "Compile all submitted release data to calculate total release-related associated costs for their area." Rewrote to read "Submit release follow-up information to the applicable regulatory agencies"
	4.1	Added "Liquid releases should be reported using the measurement unit used when transporting the product"
	4.4	Added "A deliberate, controlled release of gaseous or liquid material to the environment"
	5.0	Deleted Responsibilities
	6.1	Added "Onshore"
7/11/03	1.0	Delete "The purpose of this procedure is to provide a standard method for determining what constitutes a", reportable and details instruction on what needs to be done when a reportable release occurs"
7/11/03	2.0	Delete "SCOPE"
	2.1	Deleted "Applies To - all of Williams Energy Services' domestic Midstream/NGL and inland Transportation and Terminal facilities."

	2.2	Deleted "Exceptions - Williams Energy Canada (WEC) Foreign assets, marine terminals, and offshore assets. Marine facilities and offshore assets will report releases in accordance with facility specific Offshore Spill Response Plans and reportable quantities. The Offshore Spill Notification Matrix should also be adhered to. Foreign locations WEC will report releases per their WEC management team's guidelines."
	3.1	Deleted "Certain Company operated assets can be the source of hydrocarbon or other fluid releases or atmospheric releases into the environment. Although we can learn much about our assets and operating practices by tracking all releases, the procedure below has been developed so that the Company can allocate its resources most appropriately. However, every spill situation is different: If there is a realistic risk of exposure to the public, livestock, the soil or ground water, the event and condition must be reported. Proper reporting ensures a proper response." Added "This procedure applies to liquid and gas releases.
	3.2	Deleted "Administration", "direct the administration of all Release reporting in their area and provide the following", "liquid maintenance", "Provide reportable release volumes to Operations, as requested, for common routine intentional maintenance blow-down events", "Compile all submitted release data to calculate total release costs for their area.", "Each Environmental Specialist will communicate to their respective Area the required timeframes for submittal. Added "Submit to the applicable regulatory agencies"
	4.0	Moved "Definitions" to end of document
	5.0	Deleted "Responsibilities" Section
7/11/03	6.1	Added "Offshore Releases - Operations will immediately report all offshore releases to O'Brien Oil Pollution Services (985-781-0804) and to the Environmental Specialist. O'Brien will make the required notifications and reports to the appropriate regulatory agencies in accordance with the (add O'Brien matrix)"
	6.1.1	Added "The Environmental Specialist will complete the WES 35 - Release Report Form and forward to the Compliance Specialist in Tulsa within 5 working days"
	6.2	Deleted "or their designee", "(or within 15 minutes if an ammonia release"
	6.2.1	Deleted "Due to a system/part failure", within a 24 hour period (unless excluded by", "Any non-maintenance release from a pipeline 5 gallons or greater (i.e., seal failure or leaking valve) Added "where the release", "within a 24-hour period

	6.2.2	Deleted "Sheen on rainwater puddles in a facility (follow proper housekeeping practices)", NOTE – FLARES" "A permitted flare may have permit limits and may require tracking of flaring events Exceedance of permit limits must be immediately reported to your local Environmental Specialist, not to the toll free number", " with the exception of ammonia which must be reported for any release of 20 gallons (100 pounds) or more." Added "Routine", "A permitted flare may have permit limits and may require tracking of flaring events. Exceedance of permit limits must be immediately report to your local Environmental Specialist not to the toll-free number"
	6.2.3	Deleted "can be found at the link provided in Section 7/3. (WES-35 – Release Report Form.xls). (Changed this to a link and changed the title of the link" Added "onshore releases is listed in WES-35 Release Report Form
7/11/03	6.2.4	Deleted "NOTE - RESPONSE MEASURES The Environmental Specialist will contact local Operations to ensure adequate response measures have been taken for each release event and to track closure of each release event wit the appropriate regulatory agencies (if necessary). Added "The third party contractor will notify the appropriate regulatory agencies in accordance with the Release Matrices"
	6.3	Change "90" to "45", "record" to "database" Deleted "(KC filter press, contract disposal, etc.),",
	7.2.1	Added "Pollution Prevention and Spill Response"
	7.3	Added "Release Report Form, WES-35 (changed the title of the link)" "Offshore Incident Notification Matrix ", "Onshore Release/Spill Notification Flowchart", "O'Brien Matrix"
8/22/03	2.2.2	Added "Allow sufficient time for Operations..."
	2.0	Added "Written reports are required..." to Note section
	3.1.7	Deleted "within one hour of occurrence or discovery"
	2.4.7	Added "Some materials, such a ethylene/propylene..."
	2.4.12	Added "Louisiana allows 1.0 MMscf releases without approval or notification..."
	2.5	Added "Compliance Specialist" for maintaining database
9/3/3	3.3.3	Deleted "any release that exists an offshore platform and causes a sheen"

	3.3.3 D	Deleted "MTBE, benzene, 1,3-butadiene" Deleted "Some materials, such a ethylene/propylene have a reduced RQ due to area attainment status (Baton Rouge, Louisiana), verify RQ in pounds when atmospheric releases occur." Added "This threshold may be modified by the ES for specific areas or facilities."
	2.4.11	Deleted "Incidental" (i.e., not from a system/part failure) liquid releases less than 5 gallons of glycol, amine, methanol, condensate or other products, to include releases at truck loading racks"
	2.4.12	Changed to read "Intentional "blowdown" events (i.e., less than 5 bbls of propane/butane mix, or 50 mscf of natural gas. Louisiana allows 1.0 mmscf releases without approval or notification. If quantities are greater than 1.0 mmscf, contact your Environmental Specialist."
	2.5.3	Added "Offshore Releases not involving a sheen – Your area ES."
04/18/04	2.3.1.3 – 2.3.1.7 and 2.4.2.5 – 2.4.2.9; 4.0 – Definitions; and 2.4.4 Document Header General	Added reporting requirements from 49 CFR 191, 192 & 195; Added 4.6, 4.7 and 4.8; Changed "Title E" to "Tidally"; Established link to WES-35 – Release Report Form; Changed "Energy Services" to "System Integrity Plan," changed revision number from 5 to 6 and changed effective date to 04/19/04; and Made miscellaneous obvious corrections.
09/15/04	Entire Document	Reordered and rewritten Added Plans Required of Pipelines/Facilities Clarified that 3E needs to be called as soon as possible and corrections made later.

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 At least Annually, perform visual inspections of oil storage tanks and containers (single containers with capacities >55 gallons) for signs of deterioration, discharges or accumulation of oil inside diked areas. Document Inspections on 0019 – External Visual Tank Inspection form.

2.2 Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with SIP-ADM-7.15 - Aboveground Storage Tank Integrity

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

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, the 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. See 6.04-ADM-003 – Plans Required for Facilities-Pipelines to determine the plans applicable to your facility/pipeline.

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 secondary containment calculations to be conducted.

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 5 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. Operations is responsible for ensuring all personnel receive the required SPCC/FRP training on an annual basis. This training may be coordinated with the Environmental Specialist as part of the required annual review.

3.0 REFERENCES

3.1 Regulatory

3.1.1 Oil Pollution Prevention Act of 1990

3.1.2 40 CFR 112, Oil Pollution Prevention (EPA)

3.1.3 Applicable state, regional and local regulations

3.2 Related Policies/Procedures

3.2.1 Training CD for SPCC Plans

3.2.2 SIP-ADM-7.15 - Aboveground Storage Tank Integrity

3.3 Forms and Attachments

3.3.1 WES-87 – Record of Secondary Containment Discharge

3.3.2 WES-35 - Release Report Form

3.3.3 6.04-ADM-002 - Release Reporting

3.3.4 6.04-ADM-003 – Plans Required for Facilities-Pipelines

3.3.5 0019 – External Visual Tank Inspection

3.3.6 SIP-ADM-12.01 - Emergency Response and Planning

3.3.7 Spill Prevention Control and Countermeasure (SPCC) Plan

3.3.8 Facility Response Plan

3.3.9 SIP Feedback/Change Request

4.0 DEFINITIONS

4.1 Aboveground Storage Tank (AST) – A tank that has all its surfaces above the existing grade so as to allow visual inspection of all the tank surfaces.

4.2 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 **MMS** – Minerals Management Service

4.7 **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.

4.8 **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.

4.9 **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.

4.10 **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).

4.11 **OSRO** – Oil Spill Response Organization

4.12 **PREP** – National Preparedness for Response Exercise Program

4.13 **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.

4.14 **RSPA** – Research and Special Programs Administration

4.15 **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.

4.16 Underground Storage Tank (UST) – A tank that has all its surfaces below the existing grade.

4.17 USCG – United States Coast Guard

➢➢➢End of Procedure≺≺≺

System Integrity Plan Change Log

Date	Change Location	Brief Description of Change
9/3/3	2.1.5	Deleted
	2.2.1 B	Added "O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and"
	2.2.2 B	Changed 48-72 to "4 working days"
	2.2.2 C	Changed to "For offshore releases: If the release is not reported to OOPS, the ES will complete the WES 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. For releases reported to OOPS the ES will not distribute an initial report."
	2.2.3 B	Changed to "For off-shore or marine facility releases: The ES or Compliance Administrator will gather corrections and distribute the final report to all stakeholders via the final distribution list."
	2.3.3	Deleted Marine Facility and is responsible Rewrote to read "The Environmental Specialist is responsible for preparation of SPCC plans or FRP's ."
10/24/03	2.2.4.1	Deleted "Controlled by Area FOA
	2.3.4.3	Deleted "If release is not reported to Oops"
	2.2.4.3	Deleted "for releases reported to Oops, the ES will not distribute an initial report."
	2.2.5.2	Deleted "marine facility"
	2.2.6.1	Deleted "there is no specific timeframe to submit this information."
	2.3.3.1	Deleted "or the SPCC/FRP Program Manager"
	2.3.3.3	Deleted "or the SPCC/FRP Program Manager"
	2.3.5	Deleted "Program Manager" and "Local"
9/15/04	2.1	Deleted for manned facilities Deleted daily facility Deleted for unmanned facilities perform daily inspections. Added Document Inspections on 0018 – Visual External Inspections.
	2.2	New - Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with SIP-ADM-7.15 - Aboveground Storage Tank Integrity Renumbered

	2.5	New Routine releases of storm water from containment areas shall be documented on WES-87 – Record of Secondary Containment Discharge. All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
	2.5	Deleted: When to Initiate 2.5.1 The first person to discover a spill/release at a facility will immediately take appropriate action to protect life, and ensure safety of personnel. An attempt will be made to mitigate the effects of the spill by terminating operations, closing valves, or taking other measures to stop the leak or spill as long as personnel are not in danger. 2.5.2 For onshore releases: If the spill is reportable (refer to 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 Note Box	Added See 6.04-ADM-003 – Plans Required for Facilities-Pipelines to determine the plans applicable to your facility/pipeline.
	2.6.6	Added This training may be coordinated with the Environmental Specialist as part of the required annual review.
	3.3.4	Added 0018 – Visual External Inspections Renumbered
	4.6	Deleted Hydrocarbons and Other Fluids definition

Appendix B
NMOCD Notification and Corrective Action

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

State of New Mexico
Energy Minerals and Natural Resources

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

PUBLIC NOTICE

Notice of Discharge Plan Renewal Application

La Cosa 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 La Cosa Compressor Station. Williams expects to submit the permit application to the Oil Conservation Division in June 2005.

The facility, located in Section 34, Township 29 North, Range 11 West, San Juan County, New Mexico, approximately 1.6 miles south of Bloomfield, 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 expected to be greater than 10 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

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

NOTA PUBLICA

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

Estación de Compresor de La Cosa

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, William Field Services de 188 County Road 4900, Bloomfield, NM 87413, por la presente anuncian la intención para aplicar a la División de la Conservación del Petróleo de nuevo méxico para renovar el Plan de la Descarga para la Estación de Compresor de La Cosa. William esperan someterse la aplicación del permiso a la División de la Conservación del Petróleo en junio 2005.

La facilidad, localizado en la Sección 34, Municipio 29 al norte, la Gama 11 al oeste, San Condado de Juan, nuevo méxico, aproximadamente 1,6 sur de millas de Bloomfield, 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 se espera ser más que 10 pies. El suma se disolvió la concentración de sólidos de agua de suelo de área se espera estar en la gama de partes de 200-2,000 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.
Santa Fe NM 87505
(505) 827-1464

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

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

June 8, 2005

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted La Cosa Compressor Station (GW-187). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during June 2005.

The facility, located in Section 34, Township 29 North, Range 11 West, San Juan County, New Mexico, approximately 1.6 miles south of Bloomfield, provides natural gas compression and conditioning services.

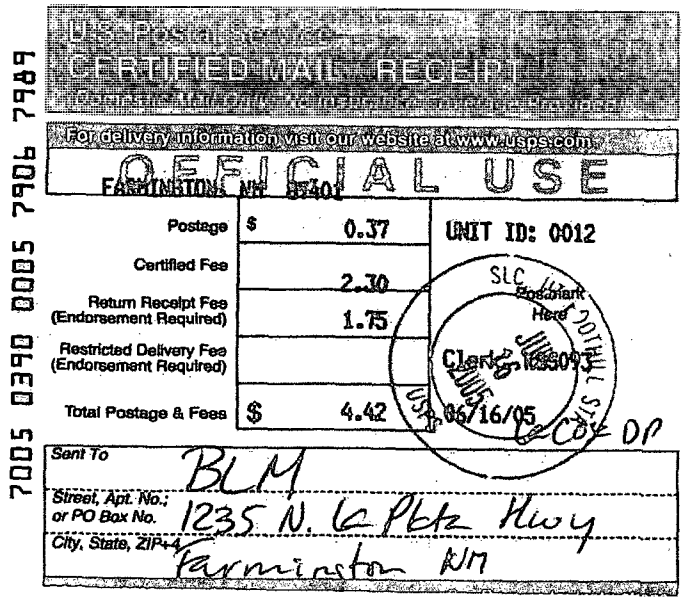
The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. Waste shipped 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 expected to be greater than 10 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,

Clara Garcia
Environmental Compliance Administrator



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

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

April 4, 2005

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

RE: Discharge Permit Renewal Notice for Williams Field Services Facilities

Dear Ms. Garcia:

Williams Field Services has the following discharge permits that expire on the dates shown below.

GW-187 expires 6/6/2005 – La Cosa Compressor Station
GW-322 expires 6/27/2005 – Lawson Compressor Station
GW-323 expires 6/27/2005 – Horton Compressor Station
GW-320 expires 6/27/2005 – Richardson Saddle Compressor Station
GW-321 expires 6/27/2005 – Glade Compressor Station
GW-198 expires 7/31/2005 - 29-6 #3 CDP Compressor Station

WQCC 3106.F. If the holder of an approved discharge permit submits an application for discharge permit renewal at least 120 days before the discharge permit expires, and the discharger is not in violation of the approved discharge permit on the date of its expiration, then the existing approved discharge permit for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge permit continued under this provision remains fully effective and enforceable. An application for discharge permit renewal must include and adequately address all of the information necessary for evaluation of a new discharge permit. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge permit renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit renewal will be assessed a fee equal to the filing fee of $100.00 plus a flat fee dependent upon horsepower rating for or type of gas processing facilities. The $100.00 filing fee is submitted with the discharge permit renewal applications and is nonrefundable.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge permit renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge permit renewal request.** (Copies of the WQCC regulations and discharge permit application form and guidelines are available on OCD's website at **www.emnrd.state.nm.us/ocd/**).

If any of the above facilities no longer has any actual or potential discharges and a discharge permit is not needed, please notify this office. If the Duke Energy Field Services has any questions, please do not hesitate to contact me at (505) 476-3489.

Sincerely,

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

cc: OCD Artesia District Office

Williams

Environmental Affairs
188 CR 4900
Bloomfield, NM 87413
505/634-4956
505/632-4781 Fax

March 7, 2001

187

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

Re: Storm Water Management Plans

Dear Mr. Ford:

Enclosed please find copies of Storm Water Management Plans for La Cosa, Trunk M, Trunk L as request by the OCD with the previous submittal for renewal of discharge plans for these stations.

Williams Field Services appreciates your assistance in handling these updates. If you have any questions or require additional information, please contact me at 505/634/4956.

Thank you,

Clara M. Garcia

Clara M Garcia
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

STORM WATER MANAGEMENT PLAN

TRUNK M COMPRESSOR STATION

Williams Field Services Company

March 2001

Table of Contents

List of Figures - All figures follow Section VI

I. PURPOSE

The purpose is to establish a Storm Water Management 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).

II. TYPE OF OPERATION

The Trunk M Compressor Station was built to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Ignacio Plant.

III. LEGALLY RESPONSIBLE PARTY

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

Contact Person:
Mark J. Bareta, Senior Environmental Specialist
Phone and Address, Same as Above

IV. LOCATION OF FACILITY

The Trunk M Compressor Station is located in the Section 29, Township 30 North, Range 6 West, in Rio Arriba County, New Mexico. A site location map is attached as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section VI of the text.

V. FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. The air permit for this site allows the operation of one 900-hp Caterpillar. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

VI. STORM WATER MANAGEMENT

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

Site Assessment and Facility Controls

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

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms, curbs, or emergency response actions, could flow overland to open off-site drainage ditches (arroyos)

and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.

Best Management Practices

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

- All waste materials and debris will be properly disposed of on an on-going basis in appropriate containers and locations for collection and removal from the site.

- Temporary storage of potential pollutant sources will be located in areas with appropriate controls for storm water protection. This would include ensuring all containers are sealed/covered and otherwise protected from contact with precipitation.

- Periodic inspection of channels and culverts shall be performed at least twice annually and after any major precipitation event.

- Sediment deposits and debris will be removed from the channels and culverts as necessary and any erosion damage at the outfall (if any) will be repaired or controlled.

- Conduct inspections of the facility on a regular basis as part of the preventive maintenance site check. Such inspections will include the visual assessment of corroded or damaged drums and tanks, broken or breached containment structures, collapsed or clogged drainages or drain lines.

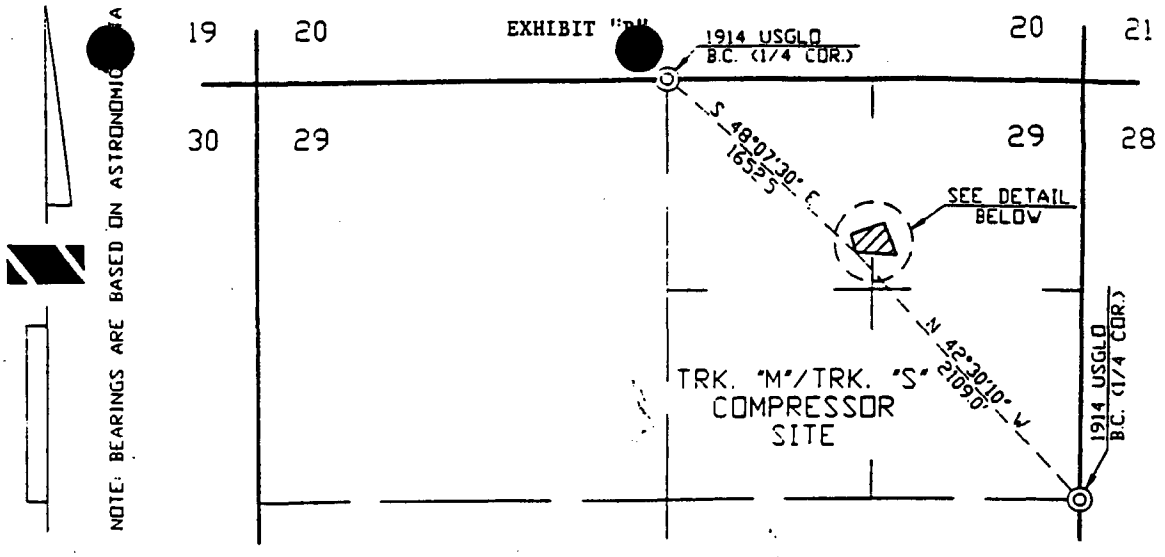
Implementation of the BMPs will prevent or mitigate impact to storm water runoff from this facility.

FIGURE 1

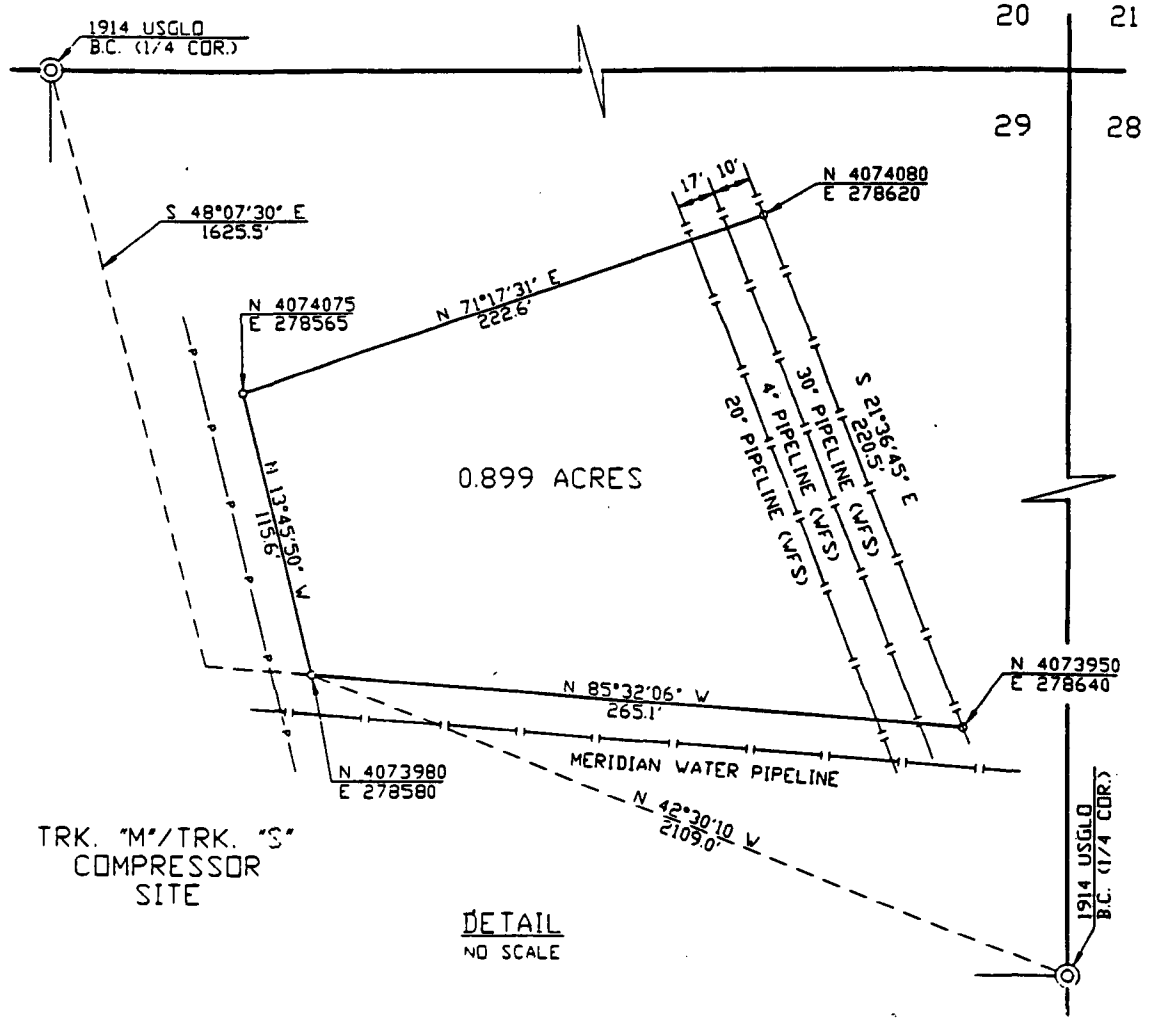
SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLOT PLAN



PLAN VIEW
SCALE 1" = 1000'



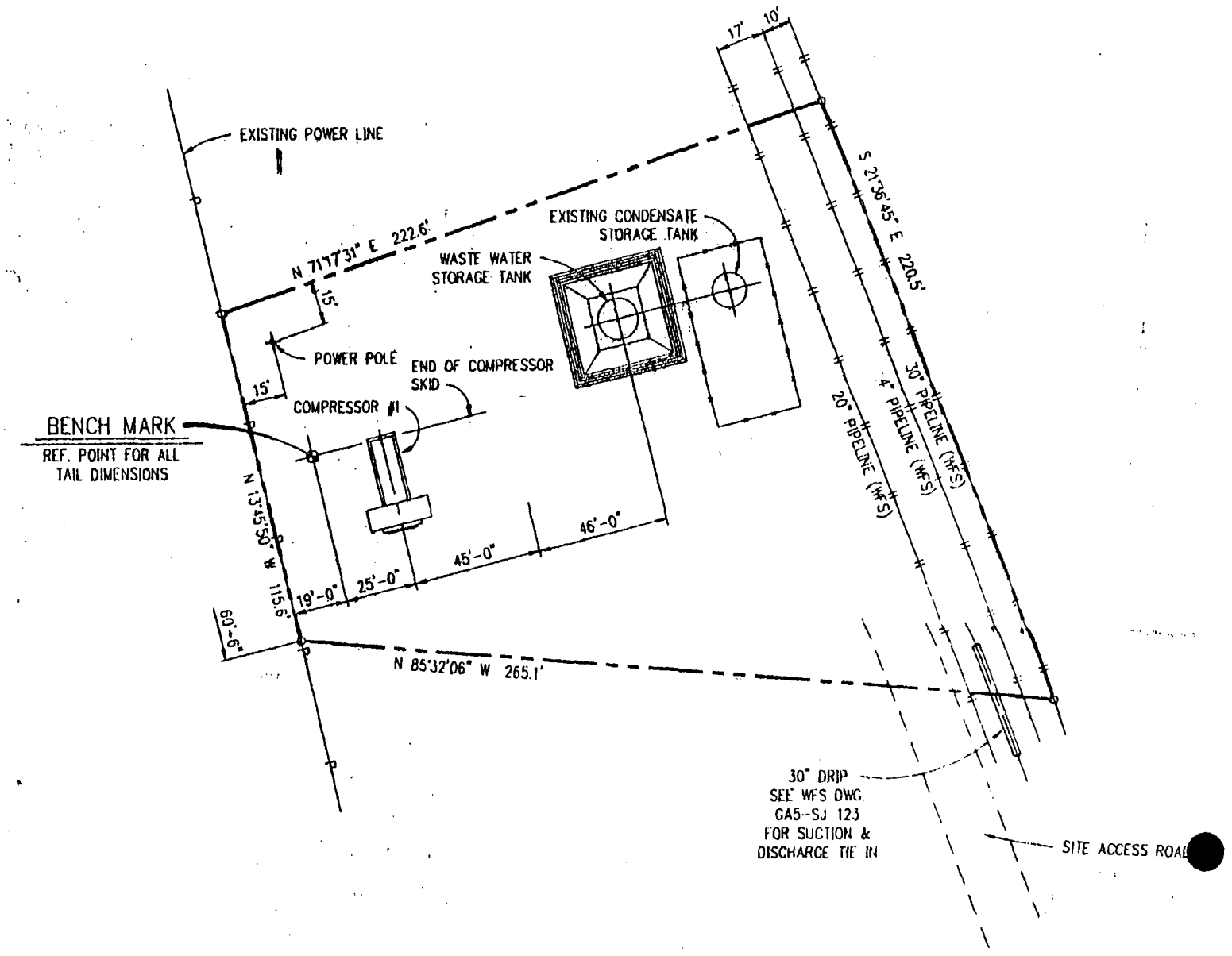
DETAIL
NO SCALE

NO	DATE	BY	REVISION	APP
1	4/14/94	CJF	ISSUED FOR REVIEW	

WILLIAMS GAS PROCESSING
ONE OF THE WILLIAMS COMPANIES

SAN JUAN GATHERING SYSTEM
TRK. "M"/TRK. "S" COMPRESSOR SITE
SEC. 29, T-30-N, R-6-W, NMPM
RIO ARRIBA COUNTY, NEW MEXICO

R/W NO.		SURVEYED 4/8/94	REF DWG	SCALE 1"=1000'	DATE 4/14/94	APPROVED BY	REV
LOC NO.	11088	MILE POST	OWNER GOMEZ v GOMEZ INC.	DRAWN BY CJF	CHECKED BY FAD	DWG NO. 765.12-X-21	1



GENERAL NOTES:

1. SITE OF APPROX. 30' x 40' TO BE LEVELED AND DEGRUBBED TO A MAXIMUM DEPTH OF 6".

0 30 60 90
SCALE: 1" = 30'

PRODUCTION OPERATORS INC.

NO.	DATE	BY	DESCRIPTION	W.O. #	APP.
0	12/22/94	HFM	ISSUED FOR CONSTRUCTION		
A	11/29/94	HFM	ISSUED FOR APPROVAL		

REVISIONS

DRAFTING	BY	DATE
DRAWN	HFM	11/18/94
CHECKED		
APPROVED		
ENGINEERING	**BY**	**DATE**
C & S REVIEW		
PROJECT APPROVED	V.Mc	11/30/94
PLOT DATE/TIME	12/22/1994 3:41 P.M.	

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

TRK. "M"/TRK/ "S" COMPRESSOR STATION EXCAVATION & SITE LAYOUT

SCALE: 1"=30'
W.O. #

DWG. NO. TKM-1-M1

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

April 25, 2000

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: OCD Discharge Plan Renewal: La Cosa Compressor Station (GW-187)

Dear Mr. Anderson:

Enclosed, please find the application for the Discharge Plan Renewal of Williams Field Services (WFS) La Cosa Compressor Station (GW-187). Check number 1000090299 for $50 to cover the application fee is included with this submittal. The information attached serves to summarize and update information submitted by WFS in the March 1995 application. For your information, documents in the WFS files that are believed to constitute the La Cosa Compressor Station Discharge Plan are listed below.

Undated letter (apx 4/99)	WFS update regarding compressor unit installation at WFS sites
October 17, 1996	WFS Discharge Plan Update (replace wastewater sump)
June 6, 1995	OCD approval of application
May 16, 1995	WFS response to OCD 5/12/95 request
May 12, 1995	OCD request for additional information
March 23, 1995	WFS Application

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

Sincerely,

Ingrid A. Deklau
Senior Environmental Specialist

enclosures

xc: Denny Foust, Aztec OCD Office

Information in the following sections updates information included in the March 1995 application and subsequent updates submitted to the OCD by WFS. The text below is formatted to correspond to the format of the March 1995 application. A plot plan of the facility is included as an attachment following this letter for your convenience.

1.0 GENERAL INFORMATION

1.1 Contact Person

Ingrid Deklau
Environmental Specialist
801-584-6543

Landowner
Williams Field Services
PO Box 58900
Salt Lake City, Utah 84158

1.3 Type of Natural Gas Operation

There are currently 2 compressor units (one 1408 hp site-rated, one 2980 hp site-rated) operating at the site. However, the current New Mexico Air Quality Permit for this site allows the installation of 3 additional 1408 hp compressor units.

2.0. GENERAL PROCESSES

2.1 Process Fluids

Table 1 below has been redesigned to illustrate transfer, storage, and disposal of process fluids, effluents, and waste solids.

2.2 Spill/Leak Prevention and Housekeeping Procedures

Additional information: An updated copy of the WFS Corporate policy and procedures for controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided following the site diagram included in this letter. WFS Environmental Affairs will report significant spills and leaks to the OCD pursuant to OCD Rule 116 and WQCC 1-203.

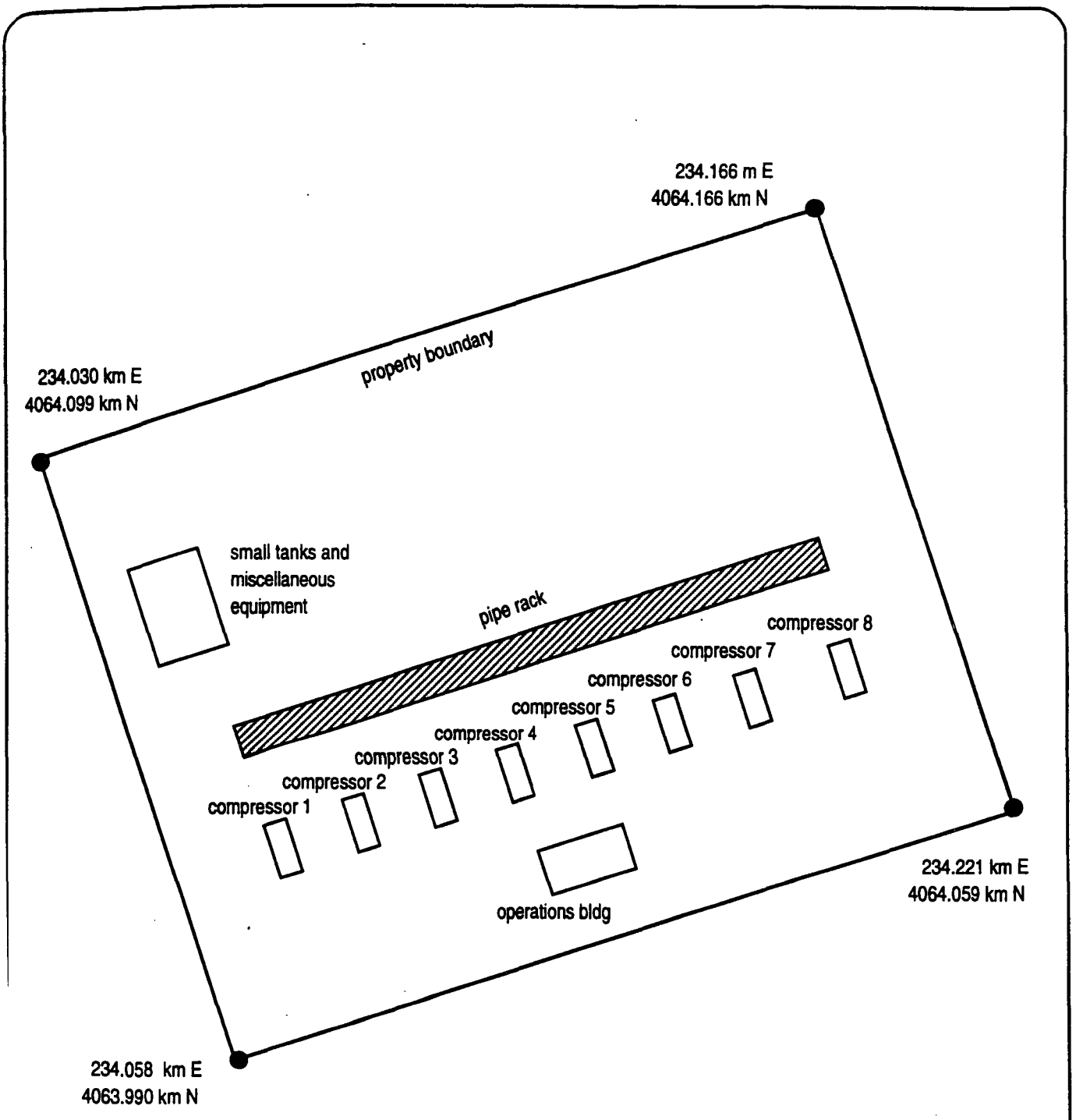
2.3 Disposal of Waste Fluids

No new waste streams have been generated since the plan was originally submitted in 1995 and subsequently modified. The following table supplements the information in Section 2.3, as it appears in the March 1995 application. Section 2.3, as it appears in the March 1995 application is accurate, with the following exception: 1) Used motor oil is collected in a closed piping system that drains to a 500-gal used oil tank adjacent to each compressor.

TABLE 1
TRANSFER, STORAGE, AND DISPOSAL OF EFFLUENTS, AND WASTE SOLIDS
LA COSA COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCE	STORAGE (typical)	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Compressors, engines	AST*	2@ 500 gal adjacent to compressors	Berm	Non-exempt	Transported to EPA-registered used oil marketer for recycling.
Condensate	If plant shutdown and bypassed	AST*	Apx 210 bbl	Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD-approved facility.
Wash Down/ Waste Water	Rain/ wash down water off equipment skids; draw-off condensate tank	Sump	740 gal	Double-wall, fiberglass tank with leak detection	Non-exempt; Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered.
Used Oil Filters	Compressors, engines	Special waste bin	Varies	N/A	Non-exempt	Drained and transported to approved disposal facility.
Spill Residue (i.e., soil, gravel) or other exempt waste	Incidental spills, leaks, or cleanup	Incident dependent	N/A	In-situ treatment, landfarm, or alternate method	Incident dependent	Landfarmed on-site or disposed at OCD-approved facility (free liquid will be removed from residue, i.e., pumping, solidification, evaporation). On-site treatment will be conducted per applicable NMOCD Guidelines.
Used Absorbents	Incidental spills, leaks, or cleanup	Special waste bin	Varies	N/A	Non-exempt	Drained and transported to approved disposal facility.
Lube Oil	For use in compressors, engines, etc.	AST*	3@ 500 gal adjacent to compressor; 2000 gal bulk storage	Berm	N/A	N/A
Antifreeze	Used in equipment to prevent freezing	AST*	2@500 gal	Berm	N/A	N/A

*AST= Above Ground Storage Tank



Not To Scale

Figure 1-2
La Cosa Compressor Station Site Layout

Williams	**Reference (Book Title)** Operations/Maintenance Field Services	**Task/Document No.** 21.10.020
	Section General/Safety	**Regulation No.**
	Subject Discharges or Spills of Oil or Hazardous Substances; Preventing, Controlling and Reporting of	**Effective Date** 09/22/99

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

▸ Document History (ISO9001)

▾ Document Body

A. PURPOSE AND SCOPE

A.1 To establish the policy and procedure for preventing, controlling and reporting of discharges or spills of oil or hazardous substances to the environment in accordance with Company practices and federal, state and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).

A.2 This document pertains to Company personnel, Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

B. CONTENTS

C. POLICY

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

D. PROCEDURE

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

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

C. POLICY

C.1 GENERAL

C.1.1 All Company facilities which could discharge or spill, oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the

public health or welfare including, but not limited to, fish, shellfish, wildlife, shorelines and beaches are subject to the provisions of this document.

C.1.2 Oil, for purpose of this document, means oil of any kind or in any form, including but not limited to petroleum hydrocarbon, fuel oil, Y grade, natural gas liquids, condensate, mixed products, sludge, oil refuse and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) is not considered to be oil.

C.1.3 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:

a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act

c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)

d. Section 112 of the Clean Air Act

e. Section 7 of the Toxic Substance Control Act

C.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

C.1.5 Facilities which could discharge or spill, oil or hazardous substances into a watercourse must comply with the applicable federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.

C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:

a. Non-Transportation Related Facilities

(1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.

(2) Underground storage facilities having a total capacity in excess of 42,000 gallons.

b. Transportation Related Facilities

(1) All vehicles, pipeline facilities, loading/unloading facilities and other mobile facilities which transport oil or hazardous substances.

C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all oil and hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.

C.1.8 The facility superintendent is responsible for spill prevention. His/her duties include, but are not limited to, the following:

a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.

b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.

c. Briefings should highlight and describe known discharges or spills and recently developed precautionary measures.

C.1.9 Each individual facility is checked annually by the superintendent or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:

a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.

b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.

c. An annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.

C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at regular scheduled intervals for accumulation of oil or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the oil or substance stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.

C.2.2 The facility superintendent should evaluate tank level monitoring requirements to prevent tank overflow.

C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.

C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

C.3 FACILITY DRAINAGE

C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from diked areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.

C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.

C.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.

C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:

a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation, or displacement by foreign materials.
b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.
c. Any dike three feet or higher should have a minimum cross section of two feet at the top.

C.3.5 Other means of containment or spill control include, but are not limited to:

a. Berms or retaining walls;
b. Curbing;
c. Culverting, gutters, or other drainage systems;
d. Weirs, booms, or other barriers;
e. Spill diversion ponds or retention ponds;
f. Sorbent materials

C.4 TRANSFER OPERATIONS, PUMPING and IN-PLANT/STATION PROCESS

C.4.1 Aboveground valves and pipelines should be examined regularly by operating personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks and metal surfaces.

C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

C.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.

C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.

C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and

outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets that may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

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

D. PROCEDURE

D.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of Oil or Hazardous Substance

Any Employee

D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity shall immediately contain the release (if safe to do so) and notify the facility superintendent, dispatcher, or other designee. Releases must be reported to gas control in the following three circumstances:

I. The Following Situations Always Require IMMEDIATE Reporting to Gas Control:
1. Release reaches or may reach surface water: (pond, lake, wash or ground water;
2. Release leaves Williams property; or
3. Release is of questionable nature (i.e., unknown product, unknown hazards)
II. Onsite Releases of Certain Common Industrial Materials Above 10 Gallon Threshold Are Reportable.

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

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

III. Releases of Certain Other Materials Reportable:

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

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

NOTE 1: A release includes material released (intentionally or unintentionally) to air, water,

or soil. When notifying Gas Control of a Release, be prepared to provide information on the type of material spilled, amount released, weather conditions, time and date of release, person discovering release and measures taken to control the release.

NOTE 2: Refer to Attachment A for containment procedures.

Facility Superintendent, Controller or Designee

D.1.2 Contacts Gas Control immediately by telephone and provides the following information:

a. Name of company facility and/or location of facility and nature of discharge or spill
b. Description and quantity of emission or substance discharged
c. Description of the circumstances causing the discharge or spill
d. Name, title and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
e. Action taken or being taken to mitigate and correct discharge or spill
f. Water bodies or streams involved
g. Time and duration of discharge or spill
h. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)

Gas Control Personnel

D.1.3 Advises Environmental Affairs departments immediately by telephone concerning the incident including any incidents reported by persons not employed with the Company.

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

D.1.4 If Environmental Affairs cannot be contacted, notifies Director over Environmental Affairs.

Facility Superintendent

D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.

D.1.6 If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).

D.1.7 Advises Environmental Affairs by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

Environmental Affairs

D.1.8 Assesses reporting requirements to state and federal agencies (contacts Legal Department and Right-of-Way Department, if appropriate). (See Emergency Operating Procedure Manuals).

D.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.

D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee

cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Superintendent or Designee

D.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:

a. Time and date of discharge or spill
b. Facility name and location
c. Type of material spilled
d. Quantity of material spilled
e. Area affected
f. Cause of spill
g. Special circumstances
h. Corrective measures taken
i. Description of repairs made
j. Preventative measures taken to prevent recurrence.

D.2.2 Forwards the completed written description to Environmental Affairs. Retains a copy for future reference.

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

ATTACHMENT A

DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS

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

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

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AFFIDAVIT OF PUBLICATION

Ad No. 42870

STATE OF NEW MEXICO
County of San Juan:

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

Monday, May 29, 2000

And the cost of the publication is: $87.63

Emmett J. McKinley

ON 6/13/2000 EMMETT MCKINLEY appeared before me, whom I know personally to be the person who signed the above document.

Duncan L. Slade

My Commission Expires April 10, 2004

COPY OF PUBLICATION

918 Legals

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-187) - Williams Field Service, Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84108-0900, has submitted a discharge plan renewal application for their La Cosa compressor station located in the NE/4 NW/4, Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 53 gallons per day of wash water will be collected and stored in above ground closed-top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 140 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 11th day of May, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

/s/ Roger Cullander
for LORI WROTENBERY, Director

SEAL

Legal No. 42870 published in the Daily Times, Farmington, New Mexico, Monday, May 29, 2000.

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION

AD NUMBER: 150218 ACCOUNT: 56689
LEGAL NO: 67453 P.O.#: 00199000278
177 LINES 1 time(s) at $ 78.03
AFFIDAVITS: 5.25
TAX: 5.20
TOTAL: 88.48

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE
I, J. Barrett being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #67453 a copy of which is hereto attached was published in said newspaper 1 day(s) between 05/25/2000 and 05/25/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 25 day of May, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Jessica Barrett
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 24 day of May A.D., 2000

Notary Candace R. Duston

Commission Expires 11/16/2003

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-187) - Williams Field Service, Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84108-0900, has submitted a discharge plan renewal application for their La Cosa compressor station located in the NE/4 NW/4, Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 53 gallons per day of wash water will be collected and stored in above ground closed-top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 140 feet with a total dissolved solids concentration of approximately 2000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of May, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
LORI WROTENBERY, Director

Legal #67453
Pub. May 25, 2000

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 11th day of May, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

Work Copy

SITE NAME	DISCHARGE PLAN #	CURRENT OCD PLAN # of Units/ HP	ACTUAL INSTALLS # of Units/ HP	AQB PERMITTED # of Units/ HP
Category 4 - Current OCD Plan reflects more units than actual install; AQB permit allows additional installs				
CARRACAS CDP	GW-112	2 units/895 HP ea	1 unit/895 HP	3 units/1378 HP ea
LA COSA C.S.	GW-187	8 units/ 1185 hp ea.	1 unit/2980 hp; 1 unit/1408 hp	1 unit/2980 hp; 4 units/1408 hp ea
Category 5 - Current OCD Plan reflects actual installations; AQB permit allows additional installs				
30-5 #1CDP	GW-108	9 units/1088 HP ea.	9 units/1088 HP ea.	12 units/1374 HP ea.
30-8 CDP	GW-133	10 units/1085 HP ea	10 units/1085 HP ea	14 units/1375 HP ea
DECKER JUNCTION CDP	GW-134	10 units/895 HP ea	10 units/895 HP ea	16 units/1388 HP ea
SIMS MESA CDP	GW-68	7 units/895 HP ea OK	7 units/895 HP ea	10 units/1374 HP ea
LATERAL N-30 C.S.	GW-256	2 units/1117 HP ea	2 units/1117 HP ea	6 units/1356 HP ea
Category 6 - Current OCD Plan reflects actual installations; all AQB permitted units are installed				
29-6 #3CDP	GW-198	1 unit/1129 HP ea.	1 unit/1129 HP ea.	1 unit/1129 HP ea,
32-8 #3	GW-116	6 units; /total site HP 8178	6 units/1373 HP ea	6 units/1373 HP ea
AZTEC CDP	GW-155	12 units/1384 HP ea	12 units/1384 HP ea	12 units/1384 HP ea
HART MTN. BOOSTER C.S.	GW-208	2 units/895 HP ea	2 units/895 HP ea	2 units/1151 HP ea
KERNAGHAN STRADDLE	GW-271	2 units/895 HP ea	2 units/895 HP ea	2 units/1121 HP ea
PRITCHARD STRADDLE C.S.	GW-273	3 units/1270 HP ea	3 units/1270 HP ea	3 units/1279 HP ea
TRUNK C BOOSTER C.S	GW-257	2 units/1268 HP ea	2 units/1268 HP ea	2 units/1268 HP ea
LAGUNA SECA	GW-307	2 units/1375 HP & 1146 hp	2 units/1375 HP& 1146 hp	2 units/1232 HP ea
TRUNK G C.S.	GW-229	1 unit/1373 HP	1 unit/1373 HP	1 unit/1373 HP
NORTH CRANDELL	GW-310	1 Sup 8GTL; 1059 hp	1 Sup 8GTL; 1059 hp	1 Sup 8GTL; 1059 hp
SNOW SHOE STRADDLE	GW-287	1 Caterpilla 500 HP	1 Caterpilla 500 HP	1 Caterpilla 500 HP
5-POINTS	GW-78	1Wauk H24GL; 418 hp	1Wauk H24GL; 418 hp	1Wauk H24GL; 418 hp
GALLEGOS	GW-293	1 Wauk F18; 335 hp	1 Wauk F18; 335 hp	1 Wauk F18; 335 hp
WILD HORSE	GW-79	1 unit/540 HP	1 unit/540 HP	1 unit/538 HP
COYOTE SPRINGS	GW-250	1 unit/1367 HP	1 unit/1367 HP	1 unit/1367 HP
CROUCH MESA	GW-129	1 unit/110 HP	1 unit/110 HP	1unit/677 HP

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

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

February 25, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-142-564-961

Ms. Ingrid Deklau
Williams Field Services
P. O. Box 58900
Salt Lake City, Utah 84108

RE: Discharge Plan Renewal Notice for Williams Field Services Facilities

Dear Mr. Deklau:

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

✓	**GW-~~137~~ 187 expires**	**6/6/2000 – La Cosa Compressor Station**
	GW-198 expires	**7/31/2000 – 29-6 No. 3 CDP Compressor Station**
	GW-208 expires	**8/18/2000 – Hart Mountain Booster Compressor Station**
	GW-229 expires	**12/6/2000 – Trunk G Compressor Station**

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $50.00 plus a flat fee equal to one-half of the original flat fee for gas processing facilities. The $50.00 filing fees is are be submitted with the discharge plan renewal applications and are nonrefundable.

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

If any of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,

Roger C. Anderson
Oil Conservation Division

cc: OCD Aztec District Office

Z 142 564 961

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

FORD OCD

Sent to I. Deklau	
Street & Number WFS	
Post Office, State, & ZIP Code SLC	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	DR Notice 2000

PS Form 3800, April 1995

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 11, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-142-564-985

Ms. Ingrid A. Deklau
Senior Environmental Specialist
Williams Field Services Company
P.O. Box 58900
Salt Lake City, Utah 84108

RE: Discharge Plan GW-187 Renewal
La Cosa CDP Compressor Station
San Juan County, New Mexico

Dear Ms. Deklau:

On June 6, 1995, the groundwater discharge plan , GW-187, for the Williams Field Services La Cosa CDP Compressor Station located in the NE/4 NW/4 of Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. **The approval will expire on June 6, 2000.**

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed. **Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether Williams Field Services has made or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the **La Cosa CDP Compressor Station** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $50.00 plus a flat fee equal to one-half of the original flat fee for compressor stations with horsepower greater than 3000 horsepower. The $50.00 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

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

If the La Cosa CDP Compressor Station no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services Company has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf

enclosed: Discharge Plan Application form

cc: OCD Aztec District Office

Z 142 564 985 OCD

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

Sent to I. Deklau	
Street & Number WFS	
Post Office, State, & ZIP Code SLC	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form 3800, April 1995

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-187) - WILLIAMS Field Services, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah, 84158-0900 has submitted a Discharge plan application for their La Cosa Compressor facility located in the NE/4 nw/4, Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, near Bloomfield, New Mexico. The total wash water discharge will be about 53 gallons/day, this water will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 140 feet with a total dissolved solids concentration of approximately 2,000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-188) - EL PASO NATURAL GAS Company, 100 N. Stanto, El Paso, Texas, 79901 has submitted a Discharge plan application for their 3B-1 Plant facility located in the NE/4 NW/4 SW/4, Section 33, Township 30 North, Range 9 West, NMPM, San Juan County, near Blanco, New Mexico. The total discharge will be about 15 gallons/day; This fluid will consist of oil and water and will be discharged to closed top storage tanks on the slight-hydorcarbon phase will be separated from the water and recycled. The waster water will then disposed of by evaporation at an approved OCD facility evaporation pond. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1,500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-189) - EL PASO NATURAL GAS Company, 100 N. Stanton, El Paso, Texas, 79901 has submitted a Discharge plan application for their Angel Park Plant facility located in the NE/4 NE/4, Section 8, Township 27 North, Range 10 West, NMPM, San Juan County, near Bloom field, New Mexico. The total discharge will be about 15 gallons/day; This fluid will consist of oil and water and will be discharged to closed top storage tanks on the slight-hydrocarbon phase will be separated from the water and recycled. The waster water will than disposed of by evaporation at an approved OCD facility evaporation pond. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 900 feet with a total dissolved solids concentration of 510 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-024) - GAS COMPANY OF NEW MEXICO, Alvarado Square Albuquerque, New Mexico, 87158-0900 has submitted a renewal application for the previously approved discharge plan for their Avalon Natural Gas Plant facility located in the NW/4 SE/4, Section 9, Township 21 South, Range 27 East, NMPM, Eddy Couty, near Carlsbad, New Mexico. Approximately 1,050 gallons/day of process wastewater is diposed of in an OCD approved offsite diposal facility. The wastewater has a total dissolved solids concentration of approximately 2600 mg/L. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at depth of approximately 80 feet with a total dissolved solids concentration of 1100 mg/L. The discharge plan address how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-179) - T&C TAnk Rental and Anchor Service Corporation, Mark Spolton, Manager, 11262 E. Highway 82, Artesia, New Mexico, 88210 has submitted a discharge plan application for their Artesia facility located in the E/2 NE/4, Section 18, Township 17 South, Range 27 East, NMPM, Eddy County, New Mexico. Approximately 630 gallons/day of produced water, with a total dissolved solids concentration of approximately 20,000 mg/L and will be collected and stored in a netted open top tank prior to transport to an offsite OCD approved disposal site. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 224 feet with a total dissolved solids concentration of approximatley 1973 mg/L. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of April, 1995.

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

Journal: May 5, 1995.

STATE OF NEW MEXICO
County of Bernalillo SS

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being of the 5 day of May, 1995, and the subsequent consecutive publications on _____, 1995

Bill Tafoya

AL SEAL
Garcia
PUBLIC
EW MEXICO
20-96

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 9th day of May 1995

PRICE $ 71.99

Statement to come at end of month.

Garcia

CLA-22-A (R-1/93) ACCOUNT NUMBER 180937

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES, INC.
P.O. Box 58900 Salt Lake City, Utah 84158-0900

October 17, 1996

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

RE: La Cosa Compressor Station GW- 187

Dear Mr. Anderson:

This letter is to update you on the status of the failed sump at the La Cosa Compressor Station. The original fiberglass wastewater sump was replaced on October 7, 1996 with a structurally reinforced, double-walled fiberglass tank. The tank holds approximately 750-gallons and is equipped with a leak detection port. The port will be inspected on a monthly basis in accordance with the approved discharge plan.

If you have any questions, please feel free to call me at (801) 584-6543.

Sincerely,

Leigh E. Gooding
Sr. Environmental Specialist

cc: Dave Sanders. KUT

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES, INC.

P.O. Box 58900 Salt Lake City, Utah 84158-0900

October 1, 1996

Mr. William LeMay
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Dear Mr. LeMay:

Williams Field Services (WFS) has identified a quality control problem in the below-grade fiberglass sumps recently installed at several WFS compressor stations. Following removal of the fiberglass sump at WFS' La Jara Compressor Station, (notification letter to NMOCD dated September 5, 1996) WFS discovered that the sump did not meet WFS' specifications. During routine monthly leak inspections, WFS detected liquid in the detection port of the sumps at the following four (4) compressor stations:

29-6 #3 CDP (GW-198)
29-7 CDP (GW-136)
La Cosa CDP (GW-187)
Navajo CDP (GW-182)

The La Cosa sump was immediately removed upon detection of the liquid in the outer sump. The sump was visually inspected and the outer wall was found to be intact. To date, the sump at La Cosa has not been permanently replaced.

WFS is in the process of securing a vendor to supply replacement sumps. Once a vendor is selected, WFS will remove and replace all of the failed sumps. Upon removal, the sumps will be visually inspected. If the integrity of the outer wall has been breeched, the surrounding soil will be excavated and confirmation samples will be collected from the walls of the excavation. Soil samples will be analyzed for total petroleum hydrocarbons (TPH). WFS will notify Mr. Denny Foust of the NMOCD Aztec office prior to each tank removal to allow NMOCD to have a representative on site. Weather permitting, WFS plans to replace all failed tanks within the next 90 days.

WFS' Trunk A (GW-243), Trunk B (GW-249), and Trunk C (GW-257) Booster Stations are currently under construction. At these sites, the below-grade sumps will be placed in concrete vaults.

295 Chipeta Way Salt Lake City, Utah 84108
(801) 584-7033

If you require any additional information, please feel free to contact me at (801) 584-6543.

Sincerely,

Leigh E. Gooding
Sr. Environmental Specialist

cc: Denny Foust, NMOCD Aztec Office
Jim West, MND
Dave Sanders, KUT

295 Chipeta Way Salt Lake City, Utah 84108
(801) 584-7033

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

P.O. Box 58900
Salt Lake City, UT 84158-0900
(801) 584-7033
FAX: (801) 584-6483

July 22, 1996

Mr. Patricio Sanchez
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Sanchez:

In response to you letters dated July 9, and July 11, 1996 concerning New Mexico Oil Conservation Division (NMOCD) Discharge Plan inspections at several Williams Field Services (WFS) facilities, I have prepared the following response:

NMOCD Letter Dated July 9, 1996

1. GW-187 or La Cosa Compressor Station (Inspected 06/05/96)

A. The La Cosa Compressor Station discharges to the Transwestern Blanco Hub. As the gas is pipeline quality, natural gas liquids are not expected to be generated at this location. The only anticipated wastes are used oil filters and washdown water which are non-exempt wastes and were described in the Discharge Plan as such. In the event natural gas liquids are generated at this facility, they will be characterized for hazardous constituents and disposed in accordance with all applicable Federal, State, and local regulations. The Discharge Plan for this station states that the gas will be discharged into the Kutz Plant (not the Milagro plant as stated in your letter). This is an incorrect statement. The gas comes from the Kutz Plant into the La Cosa Station and then into the Blanco hub.

3. GW-233 or La Jara Compressor Station (Inspected 06/03/96)

A. The landfarmed soil at the La Jara station was generated from lube oil spills. WFS chose to address the oil and grease constituents through conventional landfarming. The soil has been sampled and analyzed for TPH, Oil & Grease and will be periodically turned and retested. The soil will be characterized for hazardous constituents upon final disposition.

NMOCD Letter Dated July 11, 1996

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

A. As stated in the NMOCD-approved discharge plan for this station, "All of the lube oil tanks are on saddle racks. For overflow containment, tanks on saddle racks are underlain by concrete splash aprons equipped with retainment cubs or have containment of piping and valving." The tanks which you note as not having pad and curb-type containment are equipped with containment under the piping and valving.

B. WFS does not anticipate generating any paint wastes at this facility. It is company policy to use the entire contents of any hazardous product. All non-exempt wastes generated at WFS facilities are characterized for hazardous constituents and disposed in accordance with all applicable Federal, State, and local regulations.

C. It is WFS's policy to only use non-hazardous stoddard type or mineral spirits solvents. The MSDS for this solvent was previously supplied to NMOCD (attached).

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

A. As stated in the NMOCD-approved discharge plan for this station, "All of the lube oil tanks are on saddle racks. For overflow containment, tanks on saddle racks are underlain by concrete splash aprons equipped with retainment cubs or have containment of piping and valving." The tanks which you note as not having pad and curb-type containment are equipped with containment under the piping and valving.

B. WFS does not anticipate generating any paint wastes at this facility. It is company policy to use the entire contents of any hazardous product. All non-exempt wastes generated at WFS facilities are characterized for hazardous constituents and disposed in accordance with all applicable Federal, State, and local regulations.

C. It is WFS's policy to only use non-hazardous stoddard type or mineral spirits solvents. The MSDS for this solvent was previously supplied to NMOCD (attached).

If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Leigh E. Gooding
Sr. Environmental Specialist

attachment

MATERIAL SAFETY DATA SHEET

350-66 SOLVENT

PHIBRO ENERGY USA, INC.

BASIS PETROLEUM, INC.

500 DALLAS AVE., SUITE 3200
HOUSTON, TX 77002

Emergency Phone Numbers
24 Hour Emergency: 713-923-6641
Chemtrec Emergency: 800-424-9300

General Assistance

General Assistance: 713-848-5127

I. GENERAL INFORMATION

Trade Name:
350-66 Solvent

CAS Registry Number:
64742-88-7

Chemical Family
Paraffinic and Naphthenic Hydrocarbons

DOT Proper Shipping Name:
Petroleum Distillate, n.o.s.

DOT Hazard Class:
3

Synonyms:
Stoddard Solvent, Mineral Spirits, 140 Solvent

DOT Identification Number/Packaging Group:
UN 1268/III

Marine Pollutants:
No

II. SUMMARY OF HAZARDS

May cause irritation to eyes, skin and respiratory system. Avoid liquid, mist and vapor contact. Harmful or fatal if swallowed. Aspiration hazard, can enter lungs and cause damage. May cause irritation or be harmful if inhaled or absorbed through the skin. Flammable Liquid. Vapors may explode.

III. HAZARDOUS INGREDIENTS

Component	CAS Number	Concentration
n-Nonane	111-84-2	2 - 6 %
n-Octane	111-65-9	<1 - 3 %
1,2,4-Trimethylbenzene	95-63-6	1 - 5 %

IV. PHYSICAL DATA

Boiling Point: 350°F - 400°F

Specific Gravity: 0.79 @ 60°F

Melting Point: not applicable

Vapor Pressure: 0.1 psi @ 100°F

Vapor Density (air=1): >1

Percent Volatile: moderate

MATERIAL SAFETY DATA SHEET

IV. PHYSICAL DATA (Cont'd)

Solubility in Water: Negligible

Appearance and Odor: Water white liquid with mild hydrocarbon odor

V. FIRE AND EXPLOSION HAZARD DATA

Flash Point: 140°F

Autoignition Temperature: >400°F

Flammability Limits in Air:
- Lower Explosive Limit: 0.9%
- Upper Explosive Limit: 6.0%

NFPA Classification:
- Health: Slight (1)
- Fire: High (3)
- Reactivity: Stable (0)
- Specific Hazard: not applicable

Basic Firefighting Procedures

Flammable Liquid. Use dry chemical, foam or carbon dioxide to extinguish the fire. Consult foam manufacturer for appropriate media, application rates and water/foam ratio. Water can be used to cool fire-exposed containers, structures and to protect personnel. If a leak or spill has not ignited, ventilate area and use water spray to disperse gas or vapor and to protect personnel attempting to stop a leak. Use water to flush spills away from sources of ignition. Do not flush down public sewers.

Unusual Fire and Explosion Hazards

Dangerous when exposed to heat or flame. Vapors form flammable or explosive mixtures with air at room temperature. Vapor or gas may spread to distant ignition sources (pilot lights, welding equipment, electrical equipment, etc.) and flash back. Vapors may accumulate in low areas. Vapors may concentrate in confined areas. Flowing product can be ignited by self generated static electricity. Use adequate bonding and grounding to prevent static buildup. Runoff to sewer may cause fire or explosion hazard. Containers may explode in heat of fire. Irritating or toxic substances may be emitted upon thermal decomposition. For fires involving this material, do not enter any enclosed or confined space without proper protective equipment, which may include NIOSH approved self-contained breathing apparatus with full face mask. Clothing, rags or similar organic material contaminated with this product and stored in a closed space may undergo spontaneous combustion. Transfer to and from commonly bonded and grounded containers.

VI. REACTIVITY INFORMATION

Stability: Stable under normal conditions of use

Incompatibility: Avoid strong oxidizing agents (peroxide, dichromate, permanganate, chlorine, etc.), strong acids, caustics and halogens.

Hazardous Polymerization: Will not occur

Hazardous Reactions/Decomposition Products: Combustion may produce carbon monoxide, carbon dioxide and reactive hydrocarbons (aldehydes, aromatics, etc.)

Conditions to Avoid: Heat, sparks, open flame, static electricity or any other potential ignition sources should be avoided. Prevent vapor accumulation. Do not switch load.

MATERIAL SAFETY DATA SHEET

VII. HEALTH HAZARD INFORMATION

Product Listed as a Carcinogen or Potential Carcinogen by:

NTP - No IARC - No OSHA - No Other - No

Target Organs: Respiratory system, skin.

Primary Routes of Entry: Inhalation, ingestion, dermal or eye contact.

This product is included in the current TSCA inventory.

WARNING: This product contains benzene and toluene, chemicals known to the State of California to cause birth defects and other reproductive harm.

Occupational Exposure Limits

Compound	Source	Year	Adopted Value for Time Period		
Mineral Spirits (Stoddard Solvent)	OSHA-PEL	1993	TWA	500 ppm	8 hour
	ACGIH-TLV	1989	TWA	100 ppm	8 hour
	NIOSH-REL	1989	TWA	350 mg/m^3	8 hour
	NIOSH-REL	1989	CL	1800 mg/m^3	15 min
Nonane	ACGIH-TLV	1989	TWA	200 ppm	8 hour
Octane	OSHA-PEL	1993	TWA	500 ppm	8 hour
	ACGIH-TLV	1989	TWA	300 ppm	8 hour
	NIOSH-REL	1989	TWA	75 ppm	8 hour
	ACGIH-TLV	1989	STEL	375 ppm	15 min
	NIOSH-REL	1989	CL	385 ppm	15 min
Trimethyl Benzene (Pseudocumene)	ACGIH-TLV	1989	TWA	25 ppm	8 hour
	NIOSH-REL	1989	TWA	100 ppm	8 hour
	ACGIH-TLV	1989	STEL	150 ppm	15 min
	NIOSH-REL	1989	CL	200 ppm	10 min

Effects and Hazards of Eye Contact

May cause severe irritation, redness, tearing, blurred vision and conjunctivitis.

Effects and Hazards of Skin Contact

Prolonged or repeated contact may cause moderate irritation, defatting (cracking), redness, itching, inflammation, dermatitis and possible secondary infection. High pressure skin injections are SERIOUS MEDICAL EMERGENCIES. Injury may not appear serious at first. Within a few hours, tissues will become swollen, discolored and extremely painful. See Notes to Physician section.

VII. HEALTH HAZARD INFORMATION (Cont'd.)

Effects and Hazards of Inhalation

Nasal and respiratory tract irritation, central nervous system effects including excitation, euphoria, contracted eye pupils, dizziness, drowsiness, blurred vision, fatigue, nausea, headache, loss of reflexes, tremors, convulsions, seizures, loss of consciousness, coma, respiratory arrest and sudden death could occur as a result of long term and/or high concentration exposure to vapors. May also cause anemia and irregular heart rhythm. Repeated or prolonged exposure may cause behavioral changes.

Effects and Hazards of Ingestion

This product may be harmful or fatal if swallowed. This product may cause nausea, vomiting, diarrhea and restlessness. DO NOT INDUCE VOMITING. Aspiration into the lungs can cause severe chemical pneumonitis or pulmonary edema/hemorrhage, which can be fatal. May cause gastrointestinal disturbances. Symptoms may include irritation, depression, vomiting and diarrhea. May cause harmful central nervous system effects, similar to those listed under "Inhalation".

Medical Conditions Aggravated by Exposure

Preexisting eye, skin, heart, central nervous system and respiratory disorders may be aggravated by exposure to this product.

Toxicological Information

C9 AROMATICS produced toxicity in both the mothers and their fetuses when these animals were exposed to significant concentrations of C9 aromatics throughout pregnancy.

MINERAL SPIRITS (Stoddard Solvent) can affect the body if it is inhaled, comes in contact with the eyes or skin, or is swallowed. The vapor is a mild narcotic and a mucous membrane irritant. Since it contains aliphatic and aromatic hydrocarbons in varying concentrations, toxicologic opinion is based is based upon deductions as to the relative health hazard of the different fractions. The vapor of the aliphatic fractions is chiefly nonane and isodecane, the aromatic component is considered more toxic. Stoddard solvent has an odor threshold of about 1 ppm and olfactory fatigue has been observed in about 6 minutes at low concentrations. Eye irritation was reported in a test exposure of human subjects at 150 ppm. Industrial exposures to unknown but fairly high concentrations over long periods have resulted in headaches, eye, nose and throat irritation, fatigue, marrow hypoplasia, and in extreme cases, death. Dermal exposures to the liquid solvent have caused dermatitis and jaundice.

NONANE causes a four hour LC_{50} in rats at concentrations of 3200 ppm, or at about the same level as VM&P Naphtha. This level is markedly lower than the lethal concentrations reported in earlier mice studies involving octane (13,500 ppm) and heptane (16,000 ppm), supporting the lower limit for nonane.

OCTANE can affect the body if it is inhaled, comes in contact with the skin or eyes or is swallowed. Octane vapor is a mild narcotic and mucous membrane irritant. Concentrations of 5600 to 13,700 ppm produced narcosis in mice in 30 to 90 minutes, the fatal concentration for animals is near 13,500 ppm. No chronic systemic effects have been reported in humans.

VII. HEALTH HAZARD INFORMATION (Cont'd.)

Toxicological Information (Cont'd.)

TRIMETHYL BENZENE (Pseudocumene) can affect the body if it is inhaled, comes in contact with the eyes or skin or it is swallowed. It may also enter the body through the skin. The liquid is a primary skin irritant, but system intoxication due to absorption through the skin is not probable. High concentrations of vapors (5000 to 9000 ppm) caused central nervous system depression. Pseudocumene may cause nervousness, tension, anxiety, and asthmatic bronchitis. In addition, the peripheral blood showed a tendency to hypochromic anaemia and a deviation from the normal in the coagulability of the blood.

VIII. EMERGENCY AND FIRST AID INFORMATION

Treatment for Eye Contact

Flush immediately with large amounts of water for at least 15 minutes. Eyelids should be held away from the eyeball to ensure thorough rinsing. Seek medical advice if pain or redness continues.

Treatment for Skin Contact

Wash exposed area thoroughly with soap and water. Remove contaminated clothing promptly and launder before reuse. Contaminated leather goods should be discarded. If irritation persists or symptoms described in the MSDS develop, seek medical attention. High pressure skin injections are SERIOUS MEDICAL EMERGENCIES. Get immediate medical attention.

Treatment for Inhalation

Remove to fresh air. If breathing is difficult, ensure clear airway and administer oxygen. If not breathing, apply artificial respiration or cardiopulmonary resuscitation. Keep person warm, quiet and get medical attention.

Treatment for Ingestion

Never give anything by mouth to an unconscious person. DO NOT induce vomiting. Aspiration of material into the lungs due to vomiting can cause chemical pneumonitis which can be fatal. Give vegetable oil or charcoal slurry to retard absorption. If spontaneous vomiting occurs, keep head below hips to prevent aspiration of liquid into lungs and monitor for breathing difficulty. SEEK IMMEDIATE MEDICAL ATTENTION. Keep person warm and quiet.

Notes to Physician

In case of ingestion, gastric lavage with activated charcoal can be used promptly to prevent absorption. Consideration should be given to the use of an intratracheal tube, to prevent aspiration. Irregular heart beat may occur, use of adrenalin is not advisable. Individuals intoxicated by the product should be hospitalized immediately, with acute and continuing attention to neurological and cardiopulmonary function. Positive pressure ventilation may be necessary. After the initial episode, individuals should be followed for changes in blood variables and the delayed appearance of pulmonary edema and chemical pneumonitis. Such patients should be followed for several days or weeks for delayed effects, including bone marrow toxicity, hepatic and renal impairment. Individuals with chronic pulmonary disease will be more seriously impaired, and recovery from inhalation exposure may be complicated. In case of skin injection, prompt debridement of the wound is necessary to minimize necrosis and tissue loss.

MATERIAL SAFETY DATA SHEET

IX. PRECAUTIONARY MEASURES

Respiratory Protection

If workplace exposure limits for product or components are exceeded, NIOSH equipment should be worn. Proper respirator selection should be determined by adequately trained personnel, based on the contaminants, the degree of potential exposure and published respiratory protection factors. This equipment should be available for nonroutine and emergency use.

Eye Protection

Keep away from eyes. Eye contact can be avoided by wearing safety glasses or chemical splash goggles.

Skin Protection

Keep away from skin. Skin contact can be minimized by wearing protective gloves such as neoprene, nitrile-butadiene rubber, etc. and, where necessary, impervious clothing and boots. Leather goods contaminated with this product should be discarded. A source of clean water should be available in the work area for flushing eyes and skin.

Ventilation

Avoid breathing mists and vapor. Use in well ventilated area. In confined space, mechanical ventilation may be necessary to reduce vapor concentrations to levels below the allowable exposure limits.

Other Precautionary Measures

Tanks, vessels or other confined spaces which have contained product should be freed of vapors before entering. The container should be checked with an explosimeter for safety and an oxygen meter to ensure a safe breathing atmosphere before entry. Empty containers may contain toxic, flammable/combustible or explosive residues or vapors. Do not cut, grind, drill, weld or reuse empty containers that contained this product. Do not transfer this product to another container unless the container receiving the product is labeled with proper DOT shipping name, hazard class and other information that describes the product and its hazards.

Precautions to be Taken in Handling and Storing

Store in tightly closed containers in cool, dry, isolated and well ventilated area away from heat, sources of ignition and incompatible materials. Use non-sparking tools and explosion proof equipment. Ground lines, containers, and other equipment used during product transfer to reduce the possibility of a static induced spark. Do not "switch" load (load into containers which previously contained gasoline or other low flash material) because of possible accumulation of a static charge resulting in a source of ignition. Use good personal hygiene practices. After handling this product, wash hands before eating, drinking, smoking or using toilet facilities.

X. SPILL AND LEAK PROCEDURES

Precautions in Case of a Spill or Release

If facility or operation has an "oil or hazardous substance contingency plan", activate its procedures. Stay upwind and away from spill. Wear appropriate protective equipment including respiratory protection as conditions warrant. Do not enter or stay in area unless monitoring indicates that it is safe to do so. Isolate hazard area and restrict entry to emergency crew. Flammable Liquid. Review Fire and Explosion Hazard Data before proceeding with clean up. Keep all sources of ignition (flames, smoking, flares, etc.) and hot surfaces away from release. Contain spill in smallest possible area. Recover as much product as possible (e.g., by vacuuming). Stop leak if it can be done without risk. Use water spray to disperse vapors. Spilled material may be absorbed by an appropriate absorbent, and then handled in accordance with environmental regulations. Prevent spilled material from entering sewers, storm drains, other unauthorized treatment/drainage systems and natural waterways. Contact fire authorities and appropriate federal, state and local agencies. If spill of any amount is made into or upon navigable waters, the contiguous zone, or adjoining shorelines, contact the National Response Center at 800-424-8802. For highway or railway spills, contact Chemtrec at 800-424-9300.

Waste Disposal Method

Dispose of material in accordance with local, county, state and federal regulations. Contact state and federal regulators to determine whether the material should be classified as a hazardous waste or industrial waste and handled accordingly. Use licensed transporter and disposal facility.

XI. SARA TITLE III INFORMATION

Section 302/304 Extremely Hazardous Substances

None

Section 311 Hazard Category

Acute	Chronic	Fire	Pressure	Reactive	Not Applicable
X	X	X			

Section 313 Toxic Chemicals

1,2,4-Trimethylbenzene 5% max

XII. LABELING INFORMATION

May cause irritation to eyes, skin and respiratory system. Avoid liquid, mist and vapor contact. Harmful or fatal if swallowed. Aspiration hazard, can enter lungs and cause damage. May cause irritation or be harmful if inhaled or absorbed through the skin. Flammable Liquid. Vapors may explode.

If swallowed, do not induce vomiting, aspiration hazard. Call physician immediately. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Wash skin with soap and plenty of water. Product soaked clothing should be removed and laundered before reuse. Read Emergency and First Aid Information section of the MSDS.

MATERIAL SAFETY DATA SHEET

XII. LABELING INFORMATION (Cont'd.)

Use only in well ventilated locations. Keep away from heat, spark and flames. In case of fire, use water spray, foam, dry chemical or carbon dioxide as described in the Fire and Explosion Hazard Data section of the MSDS. Do not pressurize, cut, weld, braze, solder, drill on or near this container. "Empty" container contains residue (liquid and/or vapor) and may explode in heat of a fire.

For industrial use only. Keep out of reach of children. Failure to use caution may cause serious injury or illness. Never siphon by mouth.

DISCLAIMER

The information, recommendations and suggestions herein were compiled from reference material and other sources believed to be reliable. However, the MSDS's accuracy or completeness is not guaranteed by Phibro Energy USA, Inc., nor is any responsibility assumed or implied for any loss or damage resulting from inaccuracies or omissions. Since conditions of use are beyond our control, no warranties of merchantability or fitness for a particular purpose are expressed or implied. This MSDS is not intended as a license to operate under, or recommendation to infringe on, any patents. Appropriate warnings and safe handling procedures should be provided to handlers and users.

Prepared By:

Ron Louvier
Health, Safety and Environmental

OIL CONSERVATION DIVISION-ENVIRONMENTAL BUREAU

TO: Ms. Leigh Gooding - WFS (7/7/95)

FROM: PATRICIO W. SANCHEZ , PETROLEUM ENGINEER 505-827-7156

NUMBER OF PAGES INCLUDING THIS ONE: 2

MESSAGE:

Per, your voice mail - Here is a list of NMOCD approved commercial Surface disposal facilities.

IF YOU HAVE ANY TROUBLE RECEIVING THIS FAX PLEASE CALL (505)-827-7133.

OCD FAX NUMBER: (505)-827-8177

Leigh Gooding Fax - 801-584-7760
Phone - 801-584-6543

COMMERCIAL SURFACE DISPOSAL FACILITIES

SOUTHEAST

COMPANY	ORDER NO.	LOCATION	WASTE	DATE
Burro Pipeline	R-3238	Lane Salt Lake S13 T10S R32E	PW	1967
C & C	R-9769-A	S02 T20S R37E	LF	1993
CRI	R-9166	S27 T20S R32E	PW TP S M	1990
Daugherty	R-5464	Crosby Salt Lake S24 T08S R29E S19 T08S R30E	PW	1977
ESSR	---	S01 T26S R31E	LF	1993
Loco Hills	R-6811-A	S16 T17S R30E	PW TP	1982
Parabo	R-5516	S29 T21S R38E	PW TP S M	1977 1983
R & R Inc.	---	S05 T02N R01E	PW	1993
Unichem	R-7113	S26 T23S R29E	PW	1982

NORTHWEST

COMPANY	ORDER NO.	LOCATION	WASTE	DATE
Basin Disposal	---	S03 T29N R11W	PW	1985
Envirotech No. 1	---	S26 T27N R11W	LF	1990
Envirotech No. 2	---	S06 T26N R10W	LF	1992
~~Sunco~~	---	~~S04 T29N R09W~~	~~PW~~	~~1988~~
Sunco	R-9485-A	S02 T29N R12W	PW	1991
TNT Construction	---	S08 T25N R03W	PW LF	1990 1992
Tierra	R-9772	S02 T29N R12W	LF	1992

PW - Produced Water
TP - Waste Oil Treating Plant
S - Solids
LF - Landfarm (Solids)
M - Drilling Muds

P. 01

TRANSACTION REPORT

JUL-17-95 MON 10:47 AM

FOR: OIL CONSERVATION DIV. SIO 5058278177

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE
JUL-17	10:46 AM	918015847760	1'12"	2	SEND	OK

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/13/95,
or cash received on 7/7/95 in the amount of $ 1380.00
from Williams Field Services
for La Casa C.S. GW187
(Facility Name) (DP No.)
Submitted by: _____ Date: _____
Submitted to ASD by: [signature] Date: 7/10/95
Received in ASD by: [signature] Date: 7-11-95
Filing Fee ___ New Facility ✓ Renewal ___
Modification ___ Other _____
(specify)
Organization Code 5207 Applicable FY 96

To be deposited in the Water Quality Management Fund.
Full Payment ✓ or Annual Increment ___

WILLIAMS FIELD SERVICES COMPANY
ONE OF THE WILLIAMS COMPANIES
P. O. Box 58900
Salt Lake City, Utah 84158-0900

Corestates Bank of Delaware, N.A.
In cooperation with 1st Interstate Bank
62-22
311

DATE	CHECK NO.	NET AMOUNT
06/13/95	[redacted]	1380.00

PAY
ONE THOUSAND THREE HUNDRED EIGHTY AND 00/100----------

TO THE ORDER OF
NEW MEXICO OIL CONSERVATION DI
NM WATER QUALITY MGMT FUND
2040 SOUTH PACHECO
SANTE FE NM 87504

Williams Field Services Company
[signature]
VICE PRESIDENT
AUTHORIZED REPRESENTATIVE

[redacted]

Williams Field Services Company

4341 NEW MEXICO OIL CONSERVATION DI [redacted] 06/13/95

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
Z765962694	DISCHARGE PLAN GW-187	06/06/95	1380.00	0.00	1380.00
			1380.00	0.00	1380.00

RECEIVED
JUL 07 1995
Environmental Bureau
Oil Conservation Division

PLEASE DETACH BEFORE DEPOSITING

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

P.O. Box 58900
Salt Lake City, UT 84158-0900
(801) 584-7033
FAX: (801) 584-6483

May 16, 1995

Mr. Patricio W. Sanchez
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

RE: Discharge Plan GW-187
La Cosa Compressor Station
San Juan County, New Mexico

Dear Mr. Sanchez:

Williams Field Services (WFS) submits this clarification of the above referenced discharge plan in response to your comments and request for additional information dated May 12, 1995.

I Section 2.1 Process Fluids

A. The results of previous tests conducted on similar waste streams showed that the washdown water did not exhibit any of the hazardous characteristics and used motor oil was suitable for recycling.

B. WQCC 1-101.44 will be changed to WQCC 1-101.ZZ.

II Section 2.2 Spill/Leak Prevention and Housekeeping Procedures

A. WFS will reference WQCC 1-203 spill reporting along with NMOCD Rule 116.

B. WFS does not anticipate generating any hazardous waste at this facility. The reference to "hazardous waste" is included to clarify POI's responsibilities in the event a non-exempt stream is found to contain hazardous constituents.

C. Exempt and non-exempt wastes are managed separately. Only exempt wastes are disposed down Class II injection wells. Non-exempt wastes are characterized for hazardous constituents. WFS considers washdown water an exempt waste in the same manner that rigwash is considered an exempt waste.

D.1. WQCC Section 1-203 spill reporting procedures will also be used along with NMOCD rule 116. WQCC Section 1-203 is attached to this clarification and as such, will be included in the discharge plan.

D.2. The statement should read, "All pressure vessels on site will be tested in accordance with the requirements of the ASME Boiler and Pressure Vessel Code. All interconnecting gas piping on site will be tested in accordance with the requirements of the ASME Code for Pressure Piping, B31.8 Gas Transmission and Distribution Piping Systems."

III Section 2.3 Disposal of Waste Fluids

A. Upon disposal, non-exempt waste streams are characterized for hazardous constituents (see II.C).

If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Leigh E. Gooding, P.G.
Environmental Specialist

attachment

cc: Denny Foust, OCD District III Office

Title:NM - Environment Department • Environmental Improvement Board • Water Quality Control Commission • Groundwater Protection and Remediation Bureau • WQCC 82-1 • Part I • 1-200 • 1-203

Section: 1-203 Notification of Discharge -- Removal
Date: November 18, 1993
Subject
Terms:

1-203. Notification of Discharge -- Removal.

A. With respect to any discharge from any facility of oil or water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required;

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

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the facility;

c. the date, time, location, and duration of the discharge;

d. the source and cause of discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of discharge; and

g. any actions taken to mitigate immediate from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

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

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge

notification and reporting requirements need not additionally comply with the notification and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

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

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the division. In the event that the report is not satisfactory to the division, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the division.

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

B. Exempt from the requirements of this section are continuous or periodic discharges which are made:

1. in conformance with water quality control commission regulations and rules, regulations or orders of other state or federal agencies; or

2. in violation of water quality control commission regulations but pursuant to an assurance of discontinuance or schedule of compliance approved by the Commission or one of its duly authorized constituent agencies.

C. As used in this section:

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

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes.

4. "operator" means the person or persons responsible for the overall operation of a facility; and

5. "owner" means the person or persons who own a facility, or part of a facility.

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

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 3:45 pm	Date 5-16-95

Originating Party	Other Parties
Ms. Leigh Gooding - WFS	Pat Sanchez - NMOCD

Subject: La Cosa C.S. GW 187

Discussion: Leigh has received request for more information letter from NMOCD-(PWS). In talking with other WFS Environmental - WFS (Lee Bowerly). WFS Had in the past worked under the assumption that washdown water is analagous to rig wash. I told her to go ahead and make that statement in a letter responding to additional information letter from OCD. IN # I also told Leigh that she could just submit the parts to the discharge plan that need amending and that she does not have to submit a whole new discharge plan.

Conclusions or Agreements:

Leigh will send clarification letter stating that washdown water is similar to rig wash - as far as useage intended and is therefore Exempt under RCRA.

Distribution:

Signed Patricia W. Sanchez

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

May 12, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-682

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

RE: Discharge Plan GW-187
La Cosa Compressor Station
San Juan County, New Mexico

Dear Ms. Gooding:

The NMOCD has received the proposed La Cosa Compressor Station discharge plan application for the facility located in NE/4 NW/4, Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The application filing fee in the amount of $50 was received by the NMOCD along with the discharge plan application. The NMOCD has prepared and sent out the public notice for the La Cosa Compressor Station facility as stated in WQCC section 3-108. NMOCD has conducted a preliminary review of the proposed discharge plan as received from Williams Field Services on April 6, 1995.

The following comments and request for additional information are based on the review of the Williams Field Services Compressor Station application. **Please note that unless otherwise stated, Williams Field Service response to all comments shall be received and reviewed by the OCD prior to approval of the discharge plan application.**

I. Under 2.1 Process Fluids

A. What were the results of previous tests conducted on similar waste streams?

B. WQCC 1-101.44 needs to be changed to WQCC 1-101.ZZ.

II. Under 2.2 Spill/Leak.....

A. Williams Field Services also needs to reference WQCC 1-203 spill reporting along with NMOCD Rule 116.

B. What potential hazardous waste would Williams Field Services have at this facility?

C. Table 1 - Sources and Disposition of Process Fluids
Williams Field Services needs to make certain that exempt and non-exempt waste streams are not commingled if the waste is to be disposed of down a class II injection well. Also, non-exempt streams need to be characterized for hazardous constituents.

D. Page 4 still under 2.2 Spill/Leak.....

1. WQCC section 1-203 spill reporting procedures should also be used along with NMOCD rule 116. Please include WQCC section 1-203 in the discharge plan.

2. The statement " All pressure vessels on the site have been....."

This entire paragraph should be clarified; It is the understanding of NMOCD that no construction has taken place on the site of the proposed discharge plan.

III. Under 2.3 Disposal of Waste Fluids

A. Upon disposal of the fluid waste streams-make certain that non-exempt streams have been characterized for hazardous constituents.
EXAMPLE: Washdown water that likely will contain non-exempt lube oil from the compressor skid.

Submittal of the requested information and commitments in a timely fashion will expedite the final review of the application and approval of the discharge plan.

If you have any questions, please feel free to call me at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineer
xc: denny foust

AFFIDAVIT OF PUBLICATION

No. 34728

STATE OF NEW MEXICO
County of San Juan:

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

Thursday, May 4, 1995

and the cost of publication was: $114.42

Robert Lovett

On 5/9/95 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.

Mary J. [illegible]

My Commission Expires

March [illegible]

COPY OF PUBLICATION

Legals

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulatic the following discharge plan applications and renewal application has been submitted to the Dir tor of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Te phone (505) 827-7131:

(GW-187) - WILLIAMS Field Services, P.O. BOX 58900, M.S. 2G1,Salt Lake City, Utah, 84158-0900 has submitted a Discharge plan application for their La Cosa Compressor facility located in the NE/4 NW/4, Section 34, Township 29 North, Range 11 West, NMPM, San Juan County, near Bloomfield New Mexico. The total wash water discharge will be about 53 gallons/day, this water will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 140 feet with a total dissolved solids concentration of approximately 2,000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-188) - EL PASO NATURAL GAS Company, 100 N. Stanton, El Paso, Texas, 79901 has submitted a Discharge plan application for their 3B-1 Plant facility located in the NE/4 NW/4 SW/4, Section 33, Township 30 North, Range 9 West, NMPM, San Juan County, near Blanco New Mexico. The total discharge will be about 15 gallons/day; This fluid will consist of oil and water and will be discharged to closed top storage tanks on the sight-hydrocarbon phase will be separated from the water and recycled. The waste water will then disposed of by evaporation at an approved OCD facility evaporation pond. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1,500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-189) - EL PASO NATURAL GAS Company, 100 N. Stanton, El Paso, Texas, 79901 has submitted a Discharge plan application for their Angel Peak Plant facility located in the NE/4 NE/4, Section 8, Township 27 North, Range 10 West, NMPM, San Juan County, near Bloomfield New Mexico. The total discharge will be about 15 gallons/day; This fluid will consist of oil and water and will be discharged to closed top storage tanks on the sight-hydrocarbon phase will be separated from the water and recycled. The waste water will then disposed of by evaporation at an approved OCD facility evaporation pond. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 900 feet with a total dissolved solids concentration of 510 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-024) - GAS COMPANY OF NEW MEXICO, Alvarado Square, Albuquerque, New Mexico, 87158-0900 has submitted a renewal application for the previously approved discharge plan for their Avalon Natural Gas Plant facility located in the NW/4 SE/4, Section 9, Township 21 South, Range 27 East, NMPM, Eddy County, near Carlsbad New Mexico. Approximately 1,050 gallons/day of process wastewater is disposed of in an OCD approved offsite disposal facility. The wastewater has a total dissolved solids concentration of approximately 2600 mg/L. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at depth of approximately 80 feet with a total dissolved solids concentration of 1100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-179) - T&C Tank Rental and Anchor Service Corporation, Mark Spolton, Manager, 11262 E. Highway 82, Artesia, New Mexico, 88210 has submitted a discharge plan application for their Artesia facility located in the E/2 NE/4, Section 18, Township 17 South, Range 27 East, NMPM, Eddy County, New Mexico. Approximately 630 gallons/day of produced water, with a total dissolved solids concentration of approximately 20,000 mg/L and will be collected and stored in a netted open top tank prior to transport to an offsite OCD approved disposal site. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 224 feet with a total dissolved solids concentration of approximately 1973 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

NOTICE OF PUBLICATION

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

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of April, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal | Time 8:35 AM | Date 4-27-95

Originating Party	Other Parties
Pat Sanchez	Leigh E. Gooding WFS

Subject Washdown water — volume / time useage

Discussion NMOCD needs a washdown water useage number (Rate) so that it may be used in the public notice & discharge Plan.

Called Back @ 1:30 pm - use 460 BBL/yr.
- i.e. will convert to 19,320 gal/yr.

Conclusions or Agreements Leigh to get a number from Manzanares District.

Distribution

Signed Robin W. Seapy

GW-187

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

P.O. Box 58900
Salt Lake City, UT 84158-0900
(801) 584-7033
FAX: (801) 584-6483

March 31, 1995

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Re: Discharge Plan for La Cosa Compressor Station - San Juan County

Dear Mr. Anderson:

Enclosed please find two copies of the Discharge Plan for Williams Field Services' La Cosa Compressor Station located in San Juan County, New Mexico. One copy of the plan was mailed directly to the District III office in Aztec per Mr. Denny Foust's request. Also enclosed, please find a check for $50.00 made payable to the New Mexico Water Quality Management Fund to cover the application fee for the above referenced project.

If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Leigh E. Gooding, P.G.
Environmental Specialist

Enclosures

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/28/95,

or cash received on 4-7-95 in the amount of $ 50.00

from WILLIAMS FIELD SERVICES

for LA COSA COMPRESSOR STATION GW-087
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Roger Anderson Date: 4-7-95

Received in ASD by: _____ Date: _____

Filing Fee X New Facility ____ Renewal ____

Modification ____ Other _____
(specify)

Organization Code 521.07 Applicable FY 95

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

WILLIAMS FIELD SERVICES COMPANY
ONE OF THE WILLIAMS COMPANIES

P. O. Box 58900
Salt Lake City, Utah 84158-0900

Corestates Bank of Delaware, N.A.
In cooperation with 1st Interstate Bank
62-22
311

DATE	CHECK NO.	NET AMOUNT
03/28/95	[redacted]	50.00

PAY
FIFTY AND 00/100----------

TO THE ORDER OF
NEW MEXICO OIL CONSERVATION DI
NM WATER QUALITY MGMT FUND
2040 SOUTH PACHECO
SANTE FE NM 87504

Williams Field Services Company
VICE PRESIDENT
AUTHORIZED REPRESENTATIVE

[redacted]

DISCHARGE PLAN

GW-187

SAN JUAN GATHERING SYSTEM
LA COSA COMPRESSOR STATION

Williams Field Services Company

March 1995

1.0 GENERAL INFORMATION

1.1 Legally Responsible Party

Williams Field Services
P.O. Box 58900, M.S. 2G1
Salt Lake City, Utah 84158-0900
(801) 584-6543

Contact Person

Ms. Leigh E. Gooding
Environmental Specialist
(801) 584-6543
Address, Same as Above

1.2 Location of Discharge

The La Cosa Compressor Station is located in the NE/4 NW/4 of Section 34, Township 29 North, Range 11 West, San Juan County, New Mexico. A Site Location map is attached (Bloomfield, New Mexico) as Figure 1. The Site Layout map is presented in Figure 2. The cleared site for this Compressor Station is 4.59 acres. The site boundary survey is provided in Figure 3.

1.3 Type of Natural Gas Operation

The La Cosa Compressor Station will connect the outlet of the Kutz Processing Plant into the Milagro Hub for delivery to Transwestern Transmission Company. The volume of gas through the station is expected to be approximately 100 MMCF/day.

Eight (8) Waukesha 7042GL, 1185 horse power (site rated), skid mounted, self contained, natural gas fired lean-burn compressor units are currently planned for this site.

This facility is classified as a field compressor station. Consequently there will be no formal office or other support facilities not essential to field compression.

1.4 Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate and complete to the best of my knowledge and belief.

Signature _____ Date 3/23/95

Rob M. Hawksworth

Director, Shared Services

2.0 GENERAL PROCESSES

2.1 Process Fluids

Table 1 lists the sources and planned disposition of liquid waste process and fluids with approximations of the quantity and type. Material Safety Data Sheets for glycol and oil used in the equipment were previously provided to New Mexico Oil Conservation Division (OCD) by Williams Field Services. For reference, representative samples of washdown wastewater and used motor oil have previously been collected at a typical Williams Field Services compressor station and analyzed for the parameters listed below.

Sample	Parameters
Washdown Wastewater	TDS, pH, BETX, As, Ba, Cd, Cr, Pb, Hg, TOX.
Used Motor Oil	As, Cd, Cr, Pb, TOX, Flash Point

Additional Chemicals listed in WQCC 1-101.44 and 3-103 are not expected to be present in any process fluids or in the conventional gas transported at the La Cosa Compressor Station.

2.2 Spill/Leak Prevention and Housekeeping Procedures

Production Operators, Incorporated (POI) will be contracted to operate and maintain the facility. The facility will be inspected several times per week at a minimum and a POI operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The facility will be remotely monitored for equipment malfunctions. Production Operators must comply with Williams' spill response procedures. In the event of a release of a reportable quantity, POI will immediately notify Williams Field Services Environmental Service Department and Williams Field Services will report the release to OCD.

Environmental Protection will be a contractual obligation as follows:

POLLUTION/HAZARDOUS WASTE. POI shall take all necessary precautions to control pollution of any kind resulting from POI's operation of the compression equipment. At POI's sole cost, all hazardous substances, hazardous wastes and oil will be managed to prevent contamination of property and associated surface and groundwater resources.

POI will comply with all applicable spill reporting and recordkeeping requirements of federal, state and local laws and regulations pertaining to hazardous substances, hazardous wastes and oil. POI shall be responsible for all costs related to the cleanup and disposal of contaminated material as well as personal or property damage resulting from such contamination on said property. Hazardous wastes will be properly stored and disposed of in accordance with applicable state and federal laws and regulations.

TABLE 1

Sources and Disposition of
Process Fluids

Source	Disposition	Quantity	Quality Type	Additives
Compressor Engines	Collected Separately in Tank	125 gal each quarter	Used Motor Oil	None
Gas Inlet Separator	Collected Separately in Blowdown Tank	Variable, available for upsets	High TDS Water	None
Washdown water	Collected Separately in Tank	Intermittent	Rainwater, Tapwater with Traces of Used Motor Oil & TEG	Soap
Lube Oil	Compressor Engines		Motor Oil	None

For overflow containment, tanks on saddle racks are underlain by concrete splash aprons equipped with retainment curbs. Fluids which collect within the curbed area drain through a pipe into a closed containment system. A drip pan will be placed beneath the catwalk adjacent to the oil filter on each compressor unit to contain spillage during maintenance activities.

Spill containment dikes around the bulk storage tanks will contain 1 1/3 volume of the largest vessel. Spill containment is also provided around the tank loading valves. Surface runoff within the site will drain by sheet flow to the east.

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 will be reported to the OCD pursuant to Rule 116 using the OCD form (see Appendix B).

All pressure vessels on site have been tested in accordance with the requirement of the ASME Boiler and Pressure Vessel Code. All interconnecting gas piping on site has been tested in accordance with the requirements of the ASME Code for Pressure Piping, B31.8 Gas Transmission and Distribution Piping Systems.

2.3 Disposal of Waste Fluids

The disposition of waste fluids is described in Table 1 of Section 2.1.

Used motor oil is collected in a closed-piping system from each individual unit to a common above-ground collection tank and trucked from the site by an EPA-registered used oil marketer or recycler.

Washdown wastewater from engine deck plates is collected in a closed piping system directly to the wastewater storage tank and disposed of at a commercial facility authorized by the OCD.

Porta-pottys present at this facility will be serviced under a contract requiring proper sewage disposal in accordance with applicable laws and regulations.

3.0 Site Characteristics

A. Hydrologic Features

The La Cosa Compressor Station is located in the NE/4 NW/4 of Section 34, Township 29 North, Range 11 West, San Juan County, approximately 1.7 miles south of Bloomfield, New Mexico. The graded site elevation is approximately 5,570 feet above mean sea level. The undeveloped site is covered by sagebrush, crested wheat grass, and native grasses. The site is underlain by quaternary alluvium which has been deposited over the sandstones and shales of the Nacimiento Formation.

The site is located approximately 1.0 mile south of the San Juan River. The river is located at an elevation of approximately 5,430 feet. Based on the elevation of the river, the expected depth to groundwater at the subject site is 140 feet below ground surface. A review of the available hydrologic data[1] for this area revealed that the closest documented source of ground water downgradient from the subject site is the alluvial deposits of an unnamed ephemeral stream channel. The channel is located immediately east of the subject site at an elevation of approximately 5,560 feet. Ground water within these alluvial deposits flows north toward the San Juan River and is expected to have a total dissolved solids (TDS) concentration of approximately 2,000 mg/l.

The nearest identified ground water well is located in the SE 1/4 of Section 34, Township 29 North, Range 11 West at an elevation of approximately 5,640 feet. The total depth of the well is 800 feet and no owner or number is given for the well. The well is located approximately 3,500 feet southeast, upgradient, of the subject site.

B. Flood Protection

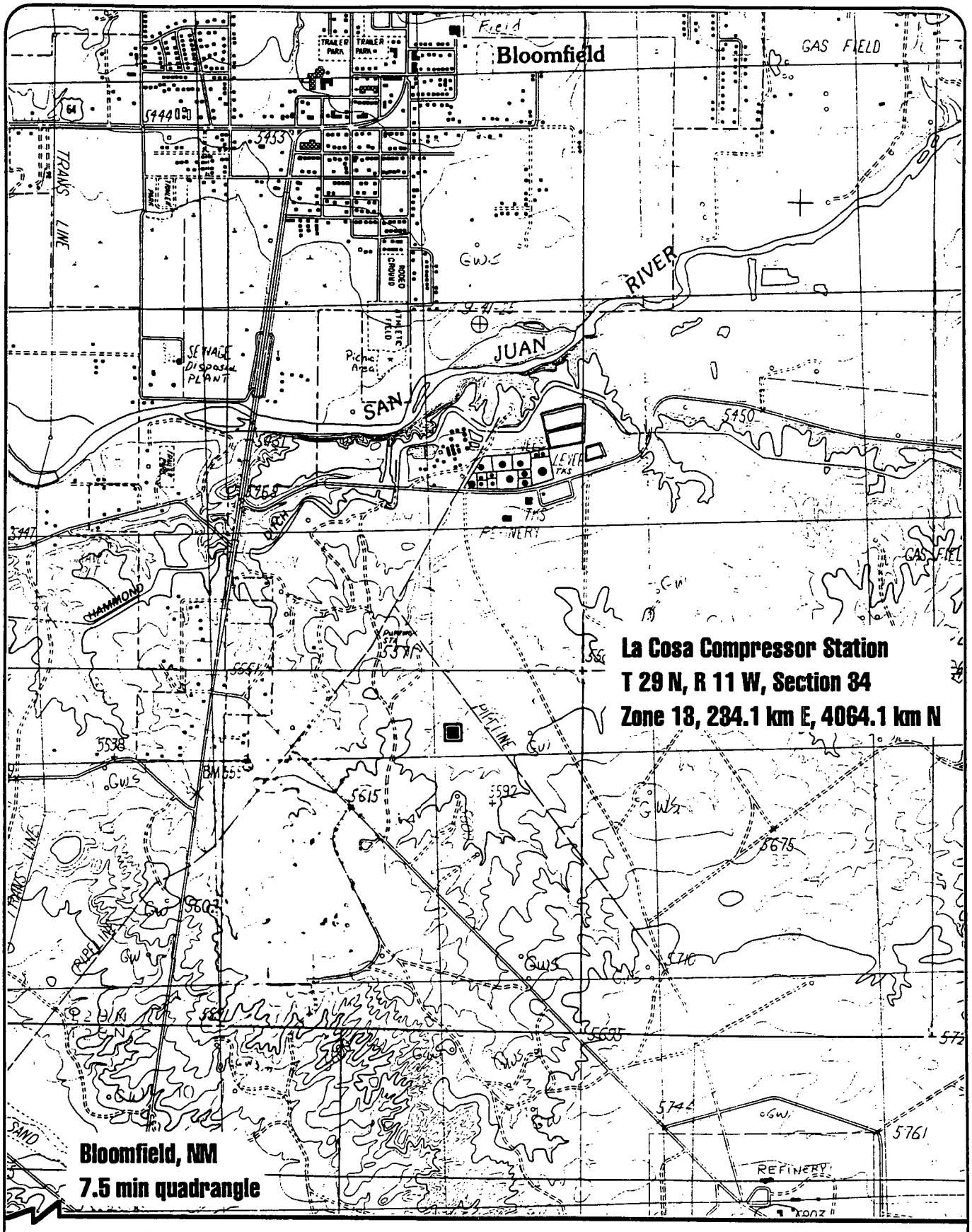
After final excavation and grading are complete, surface water runoff from the area surrounding the site will be diverted around the site into the natural drainage path.

---

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

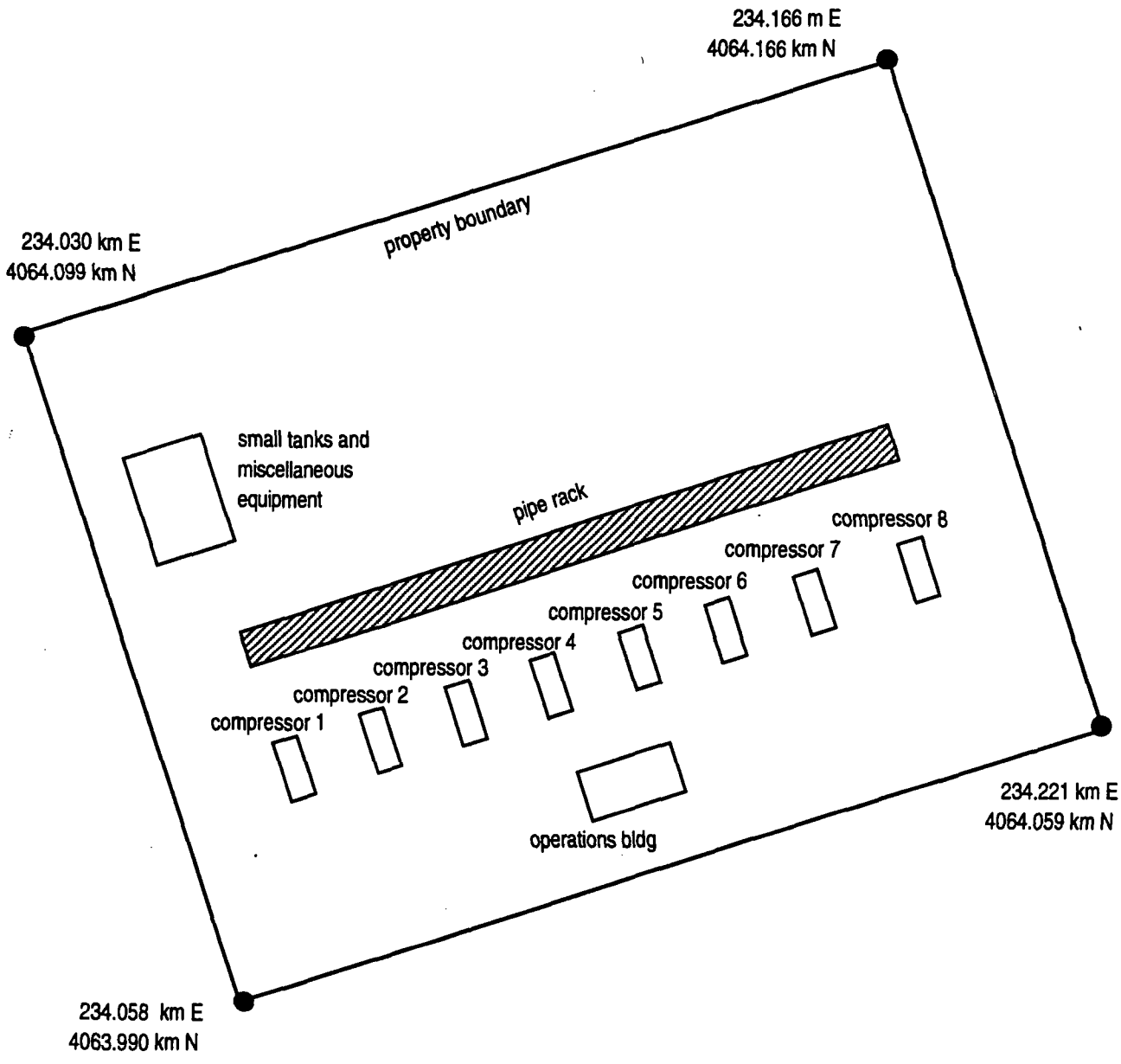
Lyford, F.P., "Ground Water in the San Juan Basin, New Mexico and Colorado", U.S.G.S. Water-Resource Investigations 79-73, May, 1979.

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



scale: 1 in ~ 2000 ft
1: 24,000

Figure 1-1
Location of Facility



esi

N

Not To Scale

Figure 1-2
La Cosa Compressor Station Site Layout

SAN JUAN GATHERING SYSTEM

LINE LA COSA COMPRESSOR STATION SITE

FROM

COUNTY SAN JUAN STATE NEW MEXICO

SECTION 34 TOWNSHIP 29-N RANGE 11-W

WILLIAMS FIELD SERVICES

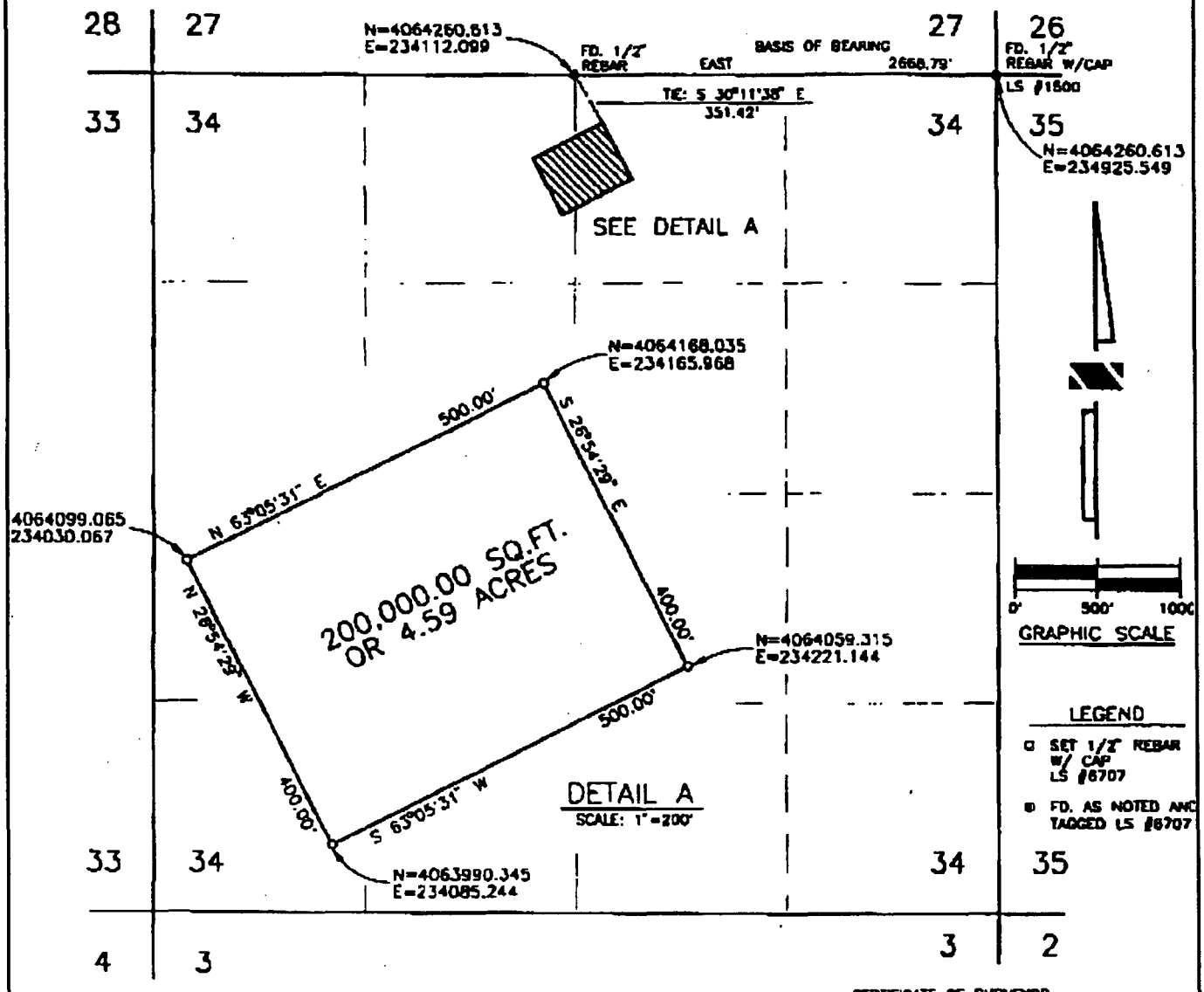
SCALE: 1" = 1000' DWG. NO.

DRAWN BY: P.B. DATE 12/22/94

CHECKED BY: L.M.T. SURVEYED 12/22/94

APPROVED: W.O. NO.

APPROVED: R/W NO.



LEGEND

- ○ SET 1/2" REBAR W/ CAP LS #6707
- ● FD. AS NOTED AND TAGGED LS #6707

NOTE: BEARINGS ARE BASED UPON THE NORTH LINE OF THE NE 1/4 SECTION 34, T29N, R11W, NMPM SAN JUAN COUNTY, NEW MEXICO. BEARS: EAST

NOTE: ALL COORDINATES AS SHOWN ARE UTM COORDINATES, NAD 27, ZONE 13, IN METERS.

CERTIFICATE OF SURVEYOR

I HEREBY CERTIFY THAT THIS PLAT IS A TRUE REPRESENTATION OF A SURVEY MADE BY ME OR UNDER MY DIRECT SUPERVISION, AND THE SAME IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Harvey D. Peterson

HARVEY D. PETERSON
NEW MEXICO L.S. #6707

CN FACTOR

CN PRESSURE

PRESSURE

MINIMUM:

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

Date: / - / - 95

# of pages ▶ /

From /

N

Figure 1-8
Facility Plot Plan

APPENDIX A

SPILL CONTROL PROCEDURES

WILLIAMS FIELD SERVICES COMPANY
ONE OF THE WILLIAMS COMPANIES

OPERATIONS

Manual	Department	
O & M Procedure		
Section	Tab	Document No.
Safety/General	10	21.10.020
Effective Date	Issue No.	Page No.
JUN 16 1993	1	1 of 6

Subject of Title

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

A. PURPOSE AND SCOPE

A.1 To establish the policy and procedure for preventing, controlling, and reporting of spills or discharges of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).

A.2 This document pertains to Company personnel and Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary applicaton of the standards; however, variations from the standards should be approved by the responsible Director.

B. CONTENTS

C. POLICY

C.1 GENERAL

C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.

C.1.2 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:

a. Section 101 (N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

b. Section 307(a) and Section 311 (b)(2)(A) of the Clean Water Act

c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)

d. Section 112 of the Clean Air Act

e. Section 7 of the Toxic Substance Control Act

Supersedes Policy and Procedure 12.10.020 dated July 7, 1989.

Approval (Page 1 Only)	Approval (Page 1 Only)	Approval (Page 1 Only)
	6/14/93	

FORM 1711 (1/92)

C.1.3 The term hazardous substance does not include petroleum, including crude oil or any fraction thereof, which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

C.1.4 Oil, for the purpose of this document, means oil of any kind or in any form, including but not limited to petroleum, fuel oil, Y grade, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) are not considered to be oil.

C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the required federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.

C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:

a. Non-Transportation Related Facilities

(1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.

(2) Underground storage facilities having a total capacity in excess of 42,000 gallons.

b. Transportation Related Facilities

(1) All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.

C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all hazardous substance storage vessels at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencys that must be notified in case of a spill.

C.1.8 The facility supervisor is responsible for spill prevention. His/her duties include, but are not limited to, the following:

a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
b. Conduct briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
c. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.

C.1.9 Each individual facility is checked by the supervisor or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:

a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.

b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.

c. A annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.

C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at annual scheduled intervals for accumulation of liquid hydrocarbons or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the material stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.

C.2.2 The facility supervisor should evaluate level monitoring requirements to prevent tank overflow.

C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.

C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

C.3 FACILITY DRAINAGE

C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from dike areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.

C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.

C.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.

C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:

a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for pecipitation, or displacement by foreign materials.

b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.

c. Any dike three feet or higher should have a minimum cross section of two feet at the top.

C.3.5 Other means of containment or spill control include, but are not limited to:

a. Berms or retaining walls;
b. Curbing;
c. Culverting, gutters, or other drainage systems;
d. Weirs, booms, or other barriers;
e. Spill diversion ponds or retention ponds;
f. Sorbent materials

C.4 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT/STATION PROCESS

C.4.1 Aboveground valves and pipelines should be examined annually by operating personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks, and metal surfaces.

C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

C.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.

C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.

C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets which may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

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

D. PROCEDURE

D.1 IDENTIFYING, CONTAINING AND INITIAL REPORTING OF A DISCHARGE OR SPILL OF OIL OR HAZARDOUS SUBSTANCE

Any Employee

D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity initiates immediate containment procedures and notifies facility supervisor.

NOTE: Refer to Attachment A for containment procedures.

Facility Supervisor

D.1.2 Contacts Gas Control and responsible Director immediately by telephone and provides the following information:

a. Name of company facility and/or location of facility and nature of discharge or spill
b. Description and quantity of emission or substance discharged
c. Name, title, and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
d. Action taken or being taken to mitigate and correct discharge or spill
e. Water bodies or streams involved
f. Time and duration of discharge or spill
g. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)

Gas Control Personnel

D.1.3 Advises Environmental Services departments immediately by telephone concerning the incident including any incidents reported by persons not employed with the Company.

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

D.1.4 If Environmental Services cannot be contacted, notifies Director over Environmental Services.

Facility Supervisor

D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.

D.1.6 If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).

D.1.7 Advises Environmental Services by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

Environmental Services

D.1.8 Contacts Legal Department (and Right-of-Way Department, if appropriate) and assesses reporting requirements to state and federal agencies. (See Emergency Operating Procedure Manuals).

D.1.9 Makes appropriate contacts with U.S. Coast Guard and state agencies when necessary.

D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Supervisor

D.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:

a. Time and date of discharge or spill
b. Facility name and location
c. Type of material spilled
d. Quantity of material spilled
e. Area affected
f. Cause of spill
g. Special circumstances
h. Corrective measures taken
i. Description of repairs made
j. Preventative measures taken to prevent recurrence.

D.2.2 Forwards the completed report to Environmental Services and a copy to Legal Department. Retains a copy for future reference.

NOTE: Environmental Services, in coordination with the Legal Department, submits written reports to government agencies.

ATTACHMENT A

Discharge or Spill Containment Procedures and Materials

Type of Facility where the Discharge or Spill occurs	Containment Procedures	Material Used for Containment
A. Oil Pipeline (as defined in C.1.4)	1. Closes appropriate block valves. 2. Contains discharge or spill by: ditching covering, applying sorbents, constructing an earthen dam, or burning. 3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	1. Straw 2. Loose Earth 3. Oil Sorbent - 3M Brand 4. Plain Wood Chips 5. Sorb - Oil Chips Banta Co. 6. Sorb - Oil Swabs - Banta Co. 7. Sorb - Oil Mats - Banta Co. 8. Or Equivalent Materials.
B. Vehicle	1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, applying sorbents, or burning. 2. Notifies immediately the Compliance and Safety Department and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials. 3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. NOTE: Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.	
c. Bulk Storage Tanks or any other Facilities	1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning. 2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	

APPENDIX B

OCD NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

DISTRICT I
P.O.Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO APPROPRIATE DISTRICT OFFICE IN ACCORDANCE WITH RULE 116 PRINTED ON BACK SIDE OF FORM

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

OPERATOR						ADDRESS		TELEPHONE #
REPORT OF	FIRE	BREAK	SPILL	LEAK		BLOWOUT	OTHER*	
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER*	
FACILITY NAME:								
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage						SEC.	TWP.	RGE.	COUNTY
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK								
DATE AND HOUR OF OCCURRENCE						DATE AND HOUR OF DISCOVERY		
WAS IMMEDIATE NOTICE GIVEN?	YES	NO	NOT REQUIRED			IF YES, TO WHOM		
BY WHOM						DATE AND HOUR		
TYPE OF FLUID LOST						QUANTITY OF LOSS	VOLUME RECOVERED	
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO	QUANTITY					
IF YES, DESCRIBE FULLY**								
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**								
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**								
DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER*				
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW	
DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**								

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED | PRINTED NAME AND TITLE | DATE

*SPECIFY **ATTACH ADDITIONAL SHEETS IF NECESSARY

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS (as of 3-1-91)

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

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

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

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

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

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

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

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

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

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

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

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

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