GW - 45

GENERAL CORRESPONDENCE

YEAR(S):

2007-1997

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, January 11, 2007 10:46 AM
To: 'Bays, David'
Cc: Price, Wayne, EMNRD
Subject: RE: OCD Discharge Plan Application for Williams Kutz Canyon Gas Plant (GW-045) & Keblah Compressor Station (GW-329)

David:

Today the OCD will close out your GW-329 discharge plan (DP) in RBDMS and transfer the file contents of the GW-329 file into the GW-045 (Williams Kutz Canyon Gas Plant) file. The Kutz Canyon Gas Plant DP does not expire until 6/28/08. Please forward the survey plat from your message below to me for the GW-045 DP file. Please contact me if you have questions. Thank you.

From: Bays, David [mailto:David.Bays@Williams.com]
Sent: Wednesday, January 10, 2007 5:48 PM
To: Chavez, Carl J, EMNRD
Cc: Price, Wayne, EMNRD; Jones, Brad A., EMNRD
Subject: RE: OCD Discharge Plan Application for Williams Kutz Canyon Gas Plant (GW-045) & Keblah Compressor Station (GW-329)

I have requested an actual survey plat for the facility and will forward it as soon as I receive it from our Right of Way Dept. Until I receive the survey plat, here is a USGS map showing the location of the Keblah Turbine. It is inside the Kutz Canyon Plant property fence.

David Bays, REM
Sr. Environmental Specialist
Williams Midstream
Phone: (505) 634-4951
Fax: (505) 632-4781

From: Chavez, Carl J, EMNRD [mailto:CarlJ.Chavez@state.nm.us]
Sent: Wednesday, January 10, 2007 1:46 PM
To: Bays, David
Cc: Price, Wayne, EMNRD; Jones, Brad A., EMNRD
Subject: RE: OCD Discharge Plan Application for Williams Kutz Canyon Gas Plant (GW-045) & Keblah Compressor Station (GW-329)

David:

Can you e-mail me or fax me a map depicting the locations of both GW-045 and GW-329? Thank you.

From: Bays, David [mailto:David.Bays@Williams.com]
Sent: Tuesday, January 09, 2007 5:31 PM
To: Chavez, Carl J, EMNRD
Cc: Price, Wayne, EMNRD; Jones, Brad A., EMNRD
Subject: RE: OCD Discharge Plan Application for Williams Kutz Canyon Gas Plant (GW-045) & Keblah Compressor Station (GW-329)

Wayne, per our discussion, Keblah is NOT a stand alone compressor station, it is inside the Kutz Canyon Plant, and serves the same function as all the other compressors at the facility. It is also considered part of the Kutz Plant by the NMED which includes the turbine in the air quality permit. The Kutz Canyon Plant includes a number of other compressors, both turbine and reciprocating, and this unit should have not been permitted as a stand alone facility. It is "in plant" horsepower.

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

December 22, 2006

Mr. Wayne Price
State of New Mexico
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Dear Mr. Price:

Williams Four Corners, LLC would like to modify its Kutz Canyon Gas Plant OCD Discharge Plan (GW-045) to incorporate the Keblah Compressor Station, which has operated under OCD Discharge Plan GW-329. The Keblah Compressor Station is located within the same property boundary as the Kutz Canyon Gas Plant in Section 12, Township 28 North, Range 11 West, in San Juan County, as shown on the attached site map. Also attached, please find the Discharge Plan Application associated with this request.

The air quality permit for this site allows the operation of one 1200-hp Solar turbine, as noted in the documentation previously submitted to your office. Attached please find Table 1 of the Kutz Discharge Plan (submitted in 2003) titled *Source, Quantity and Quality of Effluent and Waste Solids,* and the last page of Table 2 of the same plan titled *Transfer, Storage, and Disposal of Process Fluids, Effluents, and Waste Solids* which have been revised to include information regarding the Keblah Compressor Station. Revised text has been underlined and italicized in the tables for convenience. No other changes or updates are applicable at this time. When the Kutz Canyon Gas Plant Discharge Plan (GW-045) is due for renewal, all applicable modifications will be incorporated into the documentation.

Documentation attached to this letter includes:

- Discharge Plan Application form
- Site map
- Site plot plan
- Table 1, revised, *Source, Quantity and Quality of Effluent and Waste Solids, Kutz Canyon Gas Plant*
- Table 2, revised, *Transfer, Storage, and Disposal of Process Fluids, Effluents, and Waste Solids, Kutz Canyon Gas Plant*
- Public Notice

If you have any questions, I can be reached at 505-634-4951.

Respectfully submitted,

David Bays
Sr. Environmental Specialist

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☐ Renewal ☒ Modification

1. Type: Gas Plant (Kutz Canyon Gas Plant GW-045 is being modified to incorporate Keblah Station GW-329)
2. Operator: Williams Four Corners, LLC

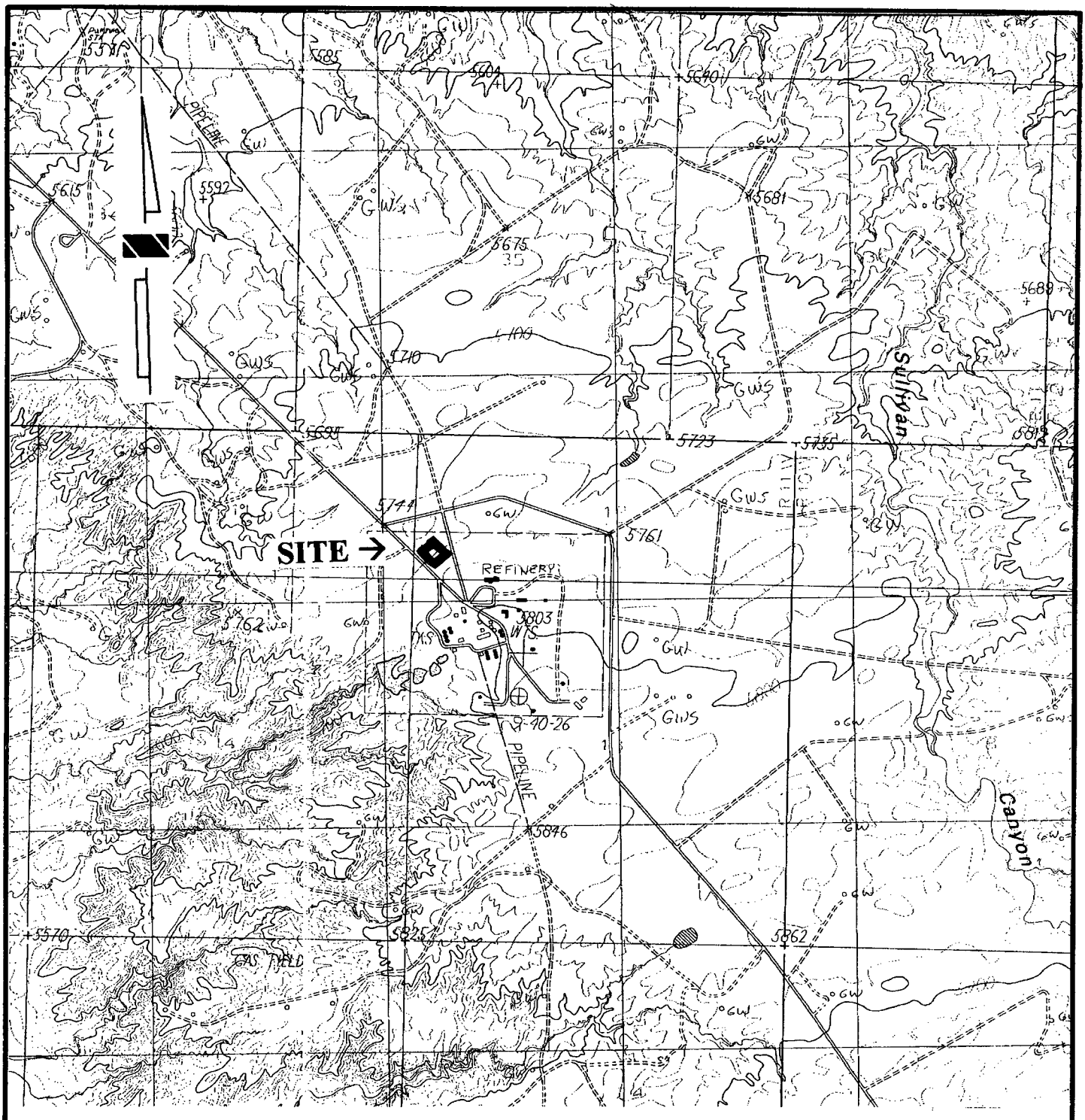
   Address: 188 County Road 4900, Bloomfield, NM 87413

   Contact Person: David Bays Phone: (505) 634-4951
3. Location: NW/4 NW/4 Section 12 Township 28N Range 11W
4. Attach the name, telephone number and address of the landowner of the facility site.
   Williams Four Corners, LLC; 188 CR 4900; Bloomfield, NM 87413
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
   Keblah information included in this submittal.
6. Attach a description of all materials stored or used at the facility.
   Keblah information included in this submittal.
7. Attach a description of present sources of effluent and waste solids. Average daily quality and daily volume of waste water must be included.
   Keblah information included in this submittal.
8. Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.
   Keblah information included in this submittal.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
   No changes, see December 2000 GW-329 and February 2003 GW-045.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
    No changes, see December 2000 GW-329 and February 2003 GW-045.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
    No changes, see December 2000 GW-329 and February 2003 GW-045.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
    No changes, see December 2000 GW-329 and February 2003 GW-045.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other rules, regulations, and/or orders.
    No changes, see December 2000 GW-329 and February 2003 GW-045.
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: David Bays Title: Environmental Specialist

Signature: David Bays Date: December 22, 2006

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



Source:USGS Bloomfield Quadrangle, New Mexico

Scale: 1" = 2,000'

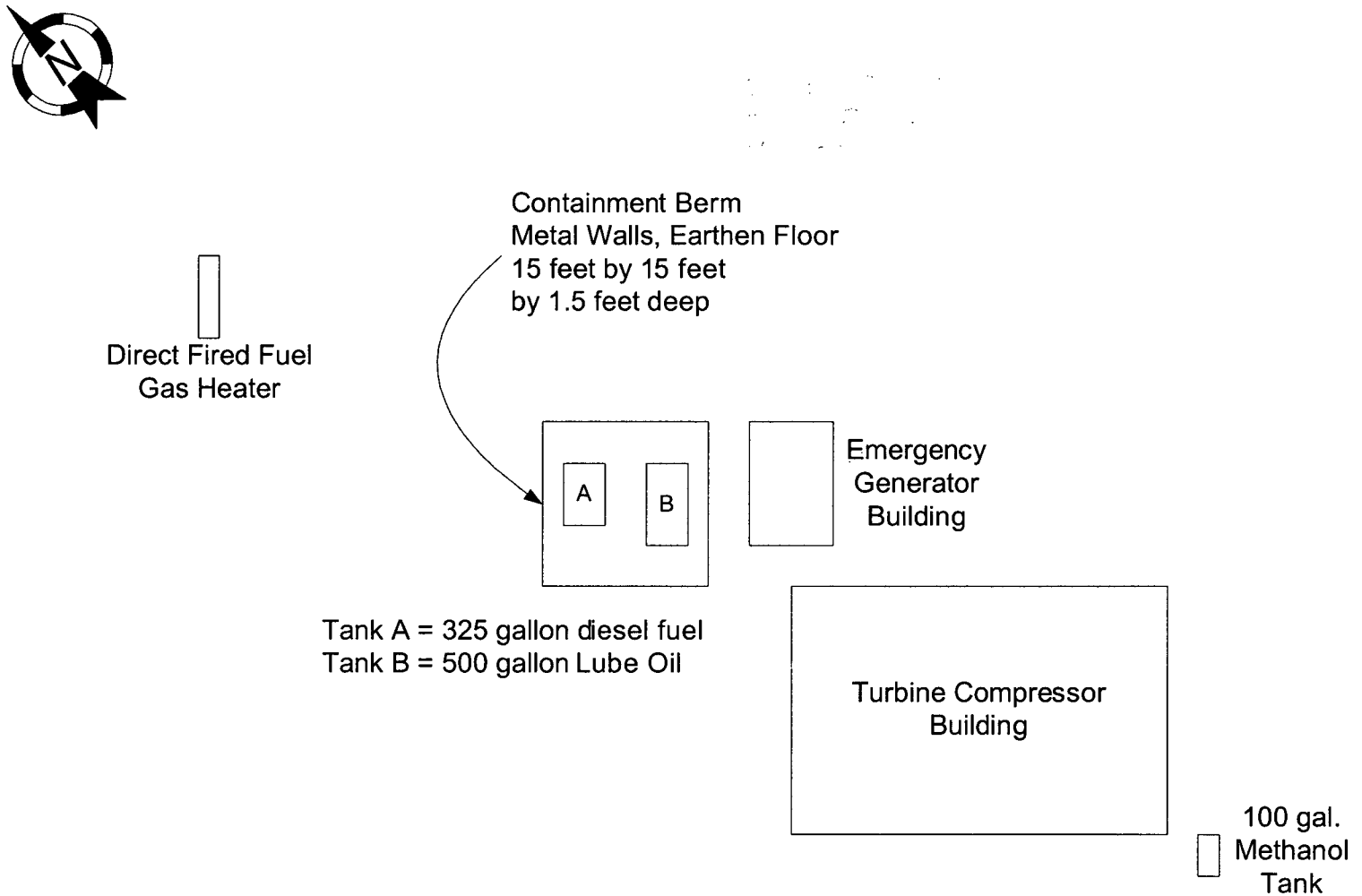
Williams

Figure 1 Site Vicinity / Topographic Map

Kleblah Compressor Station

Section 12, Township 28N Range 11W

San Juan County, New Mexico



Williams Four Corners, LLC
Keblah Compressor (Located at the Kutz Canyon Gas Plant)
Not To Scale

TABLE 1
SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS
KUTZ CANYON PLANT

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Engines, Compressors, *Turbines*, Oil/Water Separator	1,000–5,000 gallons/month	Used motor oil w/no additives
Used Solvent	Parts Cleaner	0-500 gal/year	No additives
Condensate & Natural Gasoline	Gas Conditioning Process	40,000-100,000 gallons/month	No additives
Condensate	Flare Separator	2,000-5,000 gallons/month	Hydrocarbons with traces of glycol and amine
Condensate/Amine	Flare Separator	2,000-5,000 gallons/month	Hydrocarbons with amine
Waste Water	Cooling Tower, Filter Separator, Open Drain System/Wash Down water, Produced Water, Kutz 2 Control Room Sink, Iron Sponge Process Water, Oil/Water Separator	1-1.5 million gallons/year	High TDS water, dissolved salts, traces of amine, glycol and oil
Washdown Water	*Turbine Skid*	*1000-1500 gal/year/turbine*	*Biodegradable soap and tap water with traces of used oil*
Used Oil Filters	Engines, *Turbines*, and Compressors	500-1,000 filters/year	No additives
Used Process Filters	Air, Inlet, Fuel Gas, CO_2 and Hydrocarbon Removal	500-1,500/year	No additives
Empty Drums / Containers	Liquid Containers	200-800/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Mole Sieve	Used in removal of water from Natural gas stream	20,000-25,000 lbs/yr	No additives
Used Iron Sponge	H2S Treatment System	500-1,000 bushels/yr	No additives
Used Carbon	Amine System	4,000-6,000 lbs/yr	No additives
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

Modified with text in italics 12-2006

TABLE 2 Continued
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
KUTZ PLANT

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Lube Oil (Tank 65)	Above Ground Storage Tank	2,930 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol (R&G)	Above Ground Storage Tank	1,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol (North R)	Above Ground Storage Tank	1,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol	Above Ground Storage Tanks	(2) 90,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Lube Oil	Above Ground Storage Tank	500 gallons	Metal Tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Gasoline	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Petroleum Solvent	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Refrigerant Grade Propane	Above Ground Storage Tanks	20,000 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Propane	Above Ground Storage Tanks	80,000 gallons	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Y-Product	Above Ground Storage Tanks	(2) 80,000 gallons	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel (Keblah CS)	*Above Ground Storage Tanks*	*325 gallons*	*Metal Walls with Earthen Floor*	*N/A*	*Off-spec material recycled or disposed consistent with applicable regulations.*
Lube Oil (Keblah CS)	*Above Ground Storage Tanks*	*500 gallons*	*Metal Walls with Earthen Floor*	*N/A*	*Off-spec material recycled or disposed consistent with applicable regulations.*

Modified with text in italics 12-2006

TABLE 2 Continued
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
KUTZ PLANT

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Methanol (Keblah CS)	*Above ground storage tank*	*100 gallons*	*Berm*	*N/A*	*Off-spec material recycled or disposed consistent with applicable regulations.*
Used Oil (Keblah CS)	*Drums or other containers*	*Varies*	*Mobile Unit*	*Non-exempt*	*May be hauled to a WFS or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.*
Wash-down Water (Keblah CS)	*Drums or other containers*	*Varies*	*Mobile Unit*	*Non-exempt*	*Contractor may pump wash water back into truck after washing; water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.*

Modified with text in italics 12-2006

PUBLIC NOTICE

Notice of Discharge Plan Modification Application

Keblah 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 Four Corners, LLC of 188 County Road 4900, Bloomfield, NM 87413, hereby announces intent to submit to the Oil Conservation Division a Discharge Plan Modification application for the permitted Keblah Compressor Station (GW-329) and incorporate it into the Williams Four Corners, LLC Kutz Plant Discharge Plan (GW-045), as the sites are located within the same property line. Williams expects to submit the permit application to the Oil Conservation Division in December 2006.

The facility, located in Section 12, Township 28 North, Range 11 West, San Juan County, New Mexico, approximately 2 miles south of Bloomfield, provides natural gas metering and compression services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be in the range of 200 to 500 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.

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

December 18, 2006

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Commissioner of Public Lands
State Land Office, Bldg 310
Old Santa Fe Trail
Santa Fe, NM 87410

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC is preparing to submit to the Oil Conservation Division a Discharge Plan Modification application for the permitted Keblah Compressor Station (GW-329) and incorporate it into the Williams Four Corners, LLC Kutz Plant Discharge Plan (GW-045), as the sites are located within the same property line. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Modification application to the Oil Conservation Division during December 2006.

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Comments or inquiries regarding this permit or the permit

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

Respectfully submitted,

Monica Sandoval
Environmental Compliance Administrator

7006 0100 0000 3767 3736

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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ 4.64

FARMINGTON NM 87401 DEC 19 2006 Postmark Here USPS

Sent To: Comm. of Public Lands
Street, Apt. No., or PO Box No.: State Land Office Bldg 310 Old Santa Fe Trail
City, State, ZIP+4: Santa Fe NM 87410

PS Form 3800, June 2002 See Reverse for Instructions

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

December 18, 2006

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC is preparing to submit to the Oil Conservation Division a Discharge Plan Modification application for the permitted Keblah Compressor Station (GW-329) and incorporate it into the Williams Four Corners, LLC Kutz Plant Discharge Plan (GW-045), as the sites are located within the same property line. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Modification application to the Oil Conservation Division during December 2006.

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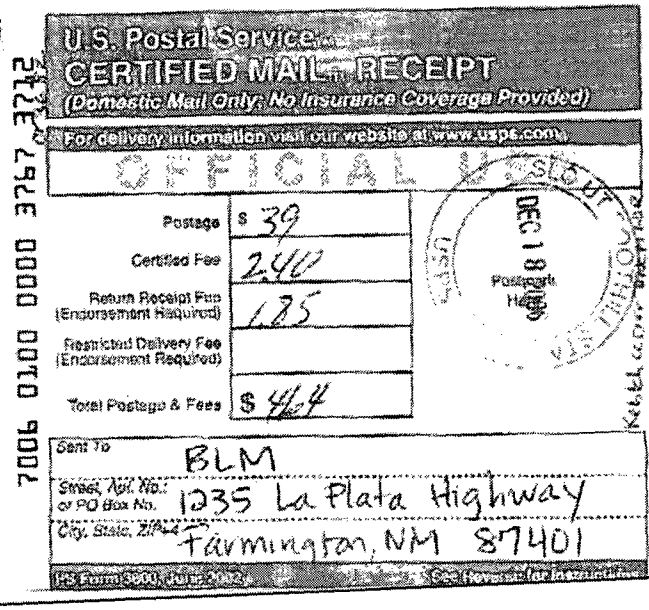
Comments or inquiries regarding this permit or the permitti

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

Respectfully submitted,

Monica Sandoval for
Environmental Compliance Administrator



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

Date: 5/14/2004

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

FAX Transmittal

To:	Jack Ford	**Phone:**	505-476-3489
	NMOCD	**Fax No:**	505-476-3462
From:	Michael K. Lane	**Phone:**	505 632-4625
	Environmental Specialist	**Fax No:**	505 632-4781
CC:	Denny Foust	**Phone:**	505-334-6178
		Fax No:	505-334-6170
Pg:	2		
Re:	C-141 for Kutz-Chaco Dehy/Flare BGT		

Jack/Denny: Hope I filled this out correctly. This is a new BGT for the Kutz Plant GW-045.

Myke

"There's never enough time to do all the nothing you want!" Calvin & Hobbes by Watterson.

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-144
March 12, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No X

Type of action: Registration of a pit or below-grade tank X Closure of a pit or below-grade tank ☐

Operator: Williams Field Services Telephone: (505) 632-4625 e-mail address: Michael.K.Lane@Williams.com

Address: 188 CR 4900, Bloomfield, NM 87413

Facility or well name: Kutz Canyon Gas Plant API #: GW-045 U/L or Qtr/Qtr NW/4 Sec 13 T 28N R 11W

County: San Juan Co. Latitude _____ Longitude _____ NAD: 1927 X 1983 ☐ Surface Owner Federal ☐ State ☐ Private X Indian ☐

Pit	**Below-grade tank**
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Volume ____bbl	Volume: 85 bbl Type of fluid: Produced Water and Drip Construction material: Steel Double-walled, with leak detection? Yes X If not, explain why not.

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet **100 feet or more**	(20 points) (10 points) **(0 points)**
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No	(20 points) **(0 points)**
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet **1000 feet or more**	(20 points) (10 points) **(0 points)**
	Ranking Score (Total Points)	**0**

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines X, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**

Date: 5/14/04

Printed Name/Title Michael K. Lane, Environmental Specialist Signature 

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Date: May 18, '04
Printed Name/Title W. Jack FORD ENVIRONMENTAL ENGINEER Signature 

Minor modification to GW-045

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-144
March 12, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

RECEIVED
MAY 1 8 2004
OIL CONSERVATION DIVISION

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☒
Type of action: Registration of a pit or below-grade tank ☒ Closure of a pit or below-grade tank ☐

Operator: Williams Field Services Telephone: (505) 632-4625 e-mail address: Michael.K.Lane@Williams.com

Address: 188 CR 4900, Bloomfield, NM 87413

Facility or well name: Kutz Canyon Gas Plant API #: _____ U/L or Qtr/Qtr NW/4 Sec 13 T 28N R 11W

County: San Juan Co. Latitude _____ Longitude _____ NAD: 1927 ☒ 1983 ☐ Surface Owner Federal ☐ State ☐ Private ☒ Indian ☐

Pit

Type: Drilling ☐ Production ☐ Disposal ☐
Workover ☐ Emergency ☐
Lined ☐ Unlined ☐
Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Volume ____bbl

Below-grade tank

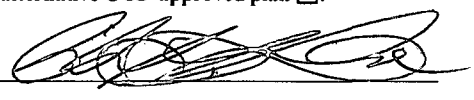
Volume: 85 bbl Type of fluid: Produced Water and Drip
Construction material: Steel
Double-walled, with leak detection? Yes ☒ If not, explain why not.

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet **100 feet or more**	(20 points) (10 points) **(0 points)**
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes **No**	(20 points) **(0 points)**
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet **1000 feet or more**	(20 points) (10 points) **(0 points)**
	Ranking Score (Total Points)	**0**

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☒, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**

Date: 5/14/04

Printed Name/Title Michael K. Lane, Environmental Specialist Signature 

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:

Date: _____

Printed Name/Title _____ Signature _____

Williams Energy Services-Enve
188 CR 4900
Bloomfield, NM 87413
505/632-4606
505/632-4781 Fax

September 1, 2004

Mr. Jack Ford
Oil Conservation Division
1220 South St Francis Dr
Santa Fe NM 87505

Re: Drain Line Testing Results at Various Williams Field Services Facilities

Dear Mr. Ford:

Williams Field Services conducted a facility review and drain line testing in accordance to the Oil Conservation Division Discharge Plan requirements. Subsurface, non-pressurized process and wastewater lines were tested. The facility drain line testing reports are enclosed with this letter. A review and testing summary is provided in the table below.

Facility	Permit #	Completion Date	Results	Comments
El Cedro	GW-149	07/26/2004	Passed	
Honolulu	GW- 315	08/05/2004	Passed	Visual inspection, piping above ground
Kutz #1 & #2	GW-045	07/16/2004	Passed	Test done on multiple days
Navajo	GW-182	07/28/2004	Passed	

If you have any questions or require additional information, please contact me at (505) 632-4606.

Respectfully Submitted,

Clara M. Garcia
Environmental Compliance

Attachments: Drain Line Testing Reports

xc: FCA Environmental 220 File
Denny Foust, OCD Aztec

Environmental Waste Water Line Test Report

Williams

LOCATION:	Kutz plant #1
DATE:	7-16-04
Sec, Range and Township	Sec 12 T28N R11W

START OF WATER FILL:	DATE:	7-16-04	TIME:	7:30AM
START OF TEST PERIOD:	DATE:	7-16-04	TIME:	12:30 PM
END OF TEST PERIOD:	DATE:	7-16-04	TIME:	1:30 PM

TEST DATA:
1. Water height by manual measurement at the datum.
2. Test to commence when maximum fill is reached and first manual measurement is recorded.
3. Test time 1 hour at 3lbs

No.	Time	Water Height	Remarks:
1	12:30	7' 2"	Holding
2	12:35	7' 2"	
3	12:40	7' 2"	
4	12:50	7' 2"	
5	12:55	7' 2"	
6	1:00	7' 2"	
7	1:10	7' 2"	
8	1:20	7' 2"	
9	1:25	7' 2"	
10	1:30	7' 2"	test Held

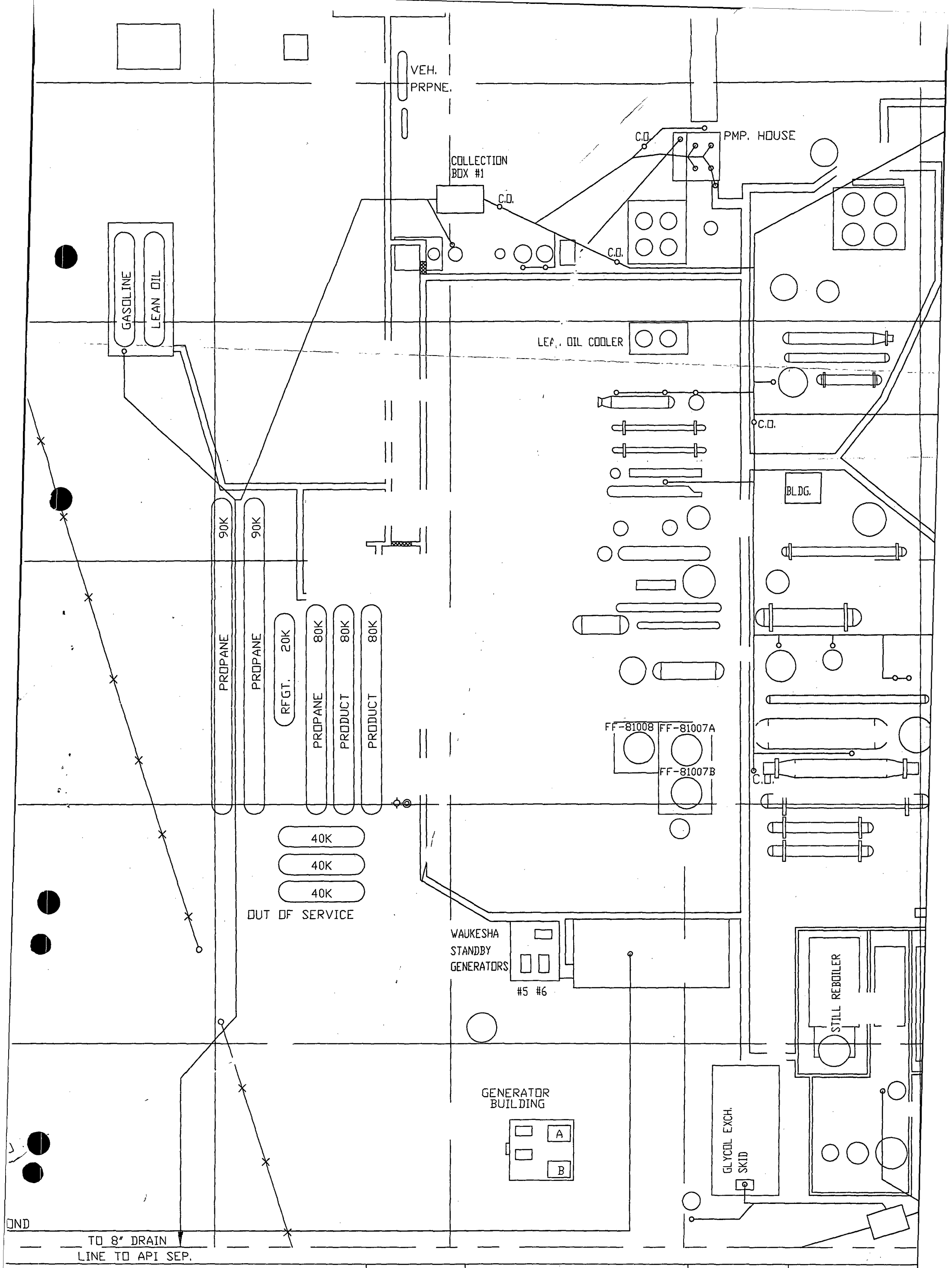
Additional Remarks:
Fixed one leak
The plant will Be tested in Sections This test Section is #4

TEST IS: ☒ ACCEPTED ☐ REJECTED

RECORDED BY: GARY COLE [signature] SUNLAND (TEST Contractor)

VERIFIED BY: Kenny Lovato (Williams) (LOCATION SUPERVISOR)

APPROVED BY: Bryant Rowdy (Test Inspector)



DRAWING NO.	TITLE	DRAWING NO.	TITLE

REFERENCE DRAWINGS

Environmental Waste Water Line Test Report

LOCATION:	Ruth Plant #1 + #2
DATE:	7-13-04
Sec, Range and Township	Sec 12 T28N R11W

START OF WATER FILL:	DATE:	7-12-04	TIME:	9:30 AM
START OF TEST PERIOD:	DATE:	7-13-04	TIME:	1:00 PM
END OF TEST PERIOD:	DATE:	7-13-04	TIME:	2:00 PM

TEST DATA:
1. Water height by manual measurement at the datum.
2. Test to commence when maximum fill is reached and first manual measurement is recorded.
3. Test time 1 hour at 3lbs

No.	Time	Water Height	Remarks:
1	1:00 PM	7'	Holding
2	1:05 PM	7'	
3	1:10 PM	7'	
4	1:20 PM	7'	
5	1:30 PM	7'	
6	1:40 PM	7'	
7	1:45 PM	7'	
8	1:50 PM	7'	
9	1:55 PM	7'	
10	2:00 PM	7'	Test Held

Additional Remarks:
This plant will need to be tested in Sections
This will be Section #3

TEST IS: ☒ ACCEPTED ☐ REJECTED

RECORDED BY: GARY COLE Gary Cole SCHLAND (TEST Contractor)

VERIFIED BY: Jake Vick (LOCATION SUPERVISOR)

APPROVED BY: Bryant Rowdy (Test Inspector)

test Section #3

FROM KUTZ 1
OPEN DRAINS

FROM COOLING TOWER
BLEED

FROM SAND FILTER
BLEED

6" SUMP

4"

VALVE BOX

AP2

SKID

COLLECTION
BOX #2

CONTROL
BLDG.

85-103
ANALYZER
BLDG.

inst. air

VLR

HE-81040

P-81039A & B
T-81025

P-81061
P-81062

SLOP
TANK

C.D.

41-106

HE-81037 & HE-81038

HE-81039

P-81040A
P-81040B

VS-81024

P-81038A
P-81038B

VS-81025

FF-81016A
FF-81016B

FF-81017A
FF-81017B

S-81024

S-81028

VS-81033

P-81042B

P-81042A

C.D.
C.D.
P-81046B

P-81046A
C.D.

S-81017

S-81016

HE-81036

VS-81022
INLET FILT. SEP.
INLET COAL. FILT. SEP.

VS-81023

F-81016

S-81026

T-81013

S-81019
TREATED GAS
SCRUBBER

P-81041

D-81002A

D-81002B

FF-81021C
C.D.

S-81016

S-81022

S-81021

P-81018

P-81043B

H-81005

FF-81021D

DEG

PIPE RACK

HE-81041

HE-81042

HE-81044

Environmental Waste Water Line Test Report

LOCATION:	Ruth plant #1
DATE:	6-24-04
Sec, Range and Township	Sec. 12 T28N R11W

START OF WATER FILL:	DATE:	6-18-04	TIME:	8:00 AM
START OF TEST PERIOD:	DATE:	6-21-04	TIME:	1:30 PM
END OF TEST PERIOD:	DATE:	6-21-04	TIME:	2:30 PM

TEST DATA:
1. Water height by manual measurement at the datum.
2. Test to commence when maximum fill is reached and first manual measurement is recorded.
3. Test time 1 hour at 3lbs

No.	Time	Water Height	Remarks:
1	1:30	7'	Holding
2	1:35	7'	
3	1:45	7'	
4	1:50	7'	
5	1:55	7'	
6	2:00	7'	
7	2:10	7'	
8	2:20	7'	
9	2:25	7'	
10	2:30	7'	test Held

Additional Remarks:
Note: This test section is on the old Clark Comp. Building
6-18-04 repaired two leaks
6-21-04 repaired 4 leaks
Test Section #2

TEST IS: ☒ ACCEPTED ☐ REJECTED

RECORDED BY: Kyle GARY DOLE SURLAND (TEST Contractor)

VERIFIED BY: Randy Smith (LOCATION SUPERVISOR)

APPROVED BY: Bryant Moseley (Test Inspector)

P-81058

C.O.

C.O.

FIRE PUMP HOUS

KUTZ 1
CONTROL ROOM

P-81013

FF-81012

FF-81005

C.O.

REFRIGERANT COMPRESSORS

R-1 R-2 R-3 G-1 G-2 G-3 G-4

STILL BOILER

METER HOUSE

C.O.

3 WTR. TK.
229,000 GAL.

TO
KUTZ 2

COLLECTION
BOX 32

FROM MAINT.
SHOP

TITLE	NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK.	APP.
								0						

REVISIONS

DR
DRAWN
CHECK
APPRO
ENG
PROJ.

test Section #2

Environmental Waste Water Line Test Report

Williams

LOCATION:	Kutz Plant #2
DATE:	6-15-04
Sec, Range and Township	Sec 12 T28N R11W

START OF WATER FILL:	DATE:	6-15-04	TIME:	11:15 AM
START OF TEST PERIOD:	DATE:	6-15-04	TIME:	12:05 PM
END OF TEST PERIOD:	DATE:	6-15-04	TIME:	~~ET~~ 1:05 PM

TEST DATA:
1. Water height by manual measurement at the datum.
2. Test to commence when maximum fill is reached and first manual measurement is recorded.
3. Test time 1 hour at 3lbs

No.	Time	Water Height	Remarks:
1	12:05	7"	Holding
2	12:10	7"	
3	12:15	7"	
4	12:25	7"	
5	12:30	7'	
6	12:35	7'	
7	12:40	7'	
8	12:45	7'	
9	12:55	7'	
10	1:05	7'	Test Held

Additional Remarks:
Note this plant will Need to Be tested on Several Sections this test is on the Kutz #2 line

TEST IS: ☒ ACCEPTED ☐ REJECTED

RECORDED BY: GARY cole Sky Lab SUNLAND (TEST Contractor)

VERIFIED BY: Randy Smith (LOCATION SUPERVISOR)

APPROVED BY: Bryant Kennedy (Test Inspector)

FILE 220

Environmental Waste Water Line Test Report

LOCATION:	Navajo CDP
DATE:	7-28-04
Sec, Range and Township	Sec. 27 T30N R8W

START OF WATER FILL:	DATE:	7-28-04	TIME:	8:00 AM
START OF TEST PERIOD:	DATE:	7-28-04	TIME:	12:30 PM
END OF TEST PERIOD:	DATE:	7-28-04	TIME:	1:30 PM

TEST DATA:
1. Water height by manual measurement at the datum.
2. Test to commence when maximum fill is reached and first manual measurement is recorded.
3. Test time 1 hour at 3lbs

No.	Time	Water Height	Remarks:
1	12:30PM	7'2"	Holding
2	12:35	7'2"	
3	12:40	7'2"	
4	12:50	7'2"	
5	12:55	7'2"	
6	1:05	7'2"	
7	1:10	7'2"	
8	1:20	7'2"	
9	1:25	7'2"	
10	1:30PM	7'2"	Test Held

Additional Remarks:

TEST IS: [X] ACCEPTED [ ] REJECTED

RECORDED BY: GARY GAS Sunland (TEST Contractor)

VERIFIED BY: (LOCATION SUPERVISOR)

APPROVED BY: (Test Inspector)

Williams

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

October 31, 2003

Mr. W. Jack Ford
State of New Mexico - Oil Conservation Division
Environmental Bureau
1220 South St. Francis Dr.
Santa Fe, NM 87505

RE: Request to Update Discharge Plans and C-134 Permits
Kutz Canyon Gas Processing Plant (GW-045) San Juan Co, NM
Lybrook Gas Plant (GW-047), Rio Arriba Co, NM

This correspondence is to a request to update the Discharge Plans and associated C-134 permits for the referenced Williams plants.

If there are any questions or additional information is requested, please contact me at (505) 632-4625.

Respectfully submitted,

Michael Lane
Williams Energy Services
Four Corners Area Environmental Specialist

Encl:

XC: Pat McCown, Lybrook Plant
Danny Sullivan, Kutz Plant
Environmental File: 220

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-134
Revised June 10, 2003

Submit 4 Copies to
appropriate District Office

Permit No. _____
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952

FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(I)

Operator Name: **Williams Field Services** **(NMOCD Discharge Plan: GW-045)**

Operator Address: **188 CR 4900, Bloomfield, NM 87413**

Lease or Facility Name **Kutz Canyon Gas Plant** Location **NW/4 S13, T28N, R11W**
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: **236 ft X 236 ft X 10 ft (Evaporation Pond)**

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

Pond is used to evaporate waste water from the processing plant (Kutz I and II). An API oil/water separator is located upstream of effluent to pond to prevent incidental oil form reaching the pond. Perimeter is fenced and sprayers help to discourage wildlife and birds from using pond.

1) If any oil or hydrocarbons should reach this facility, give method and time required for removal:

Should oil reach the pond, a boom will be used to isolate oil and the oil will be skimmed from the water surface.

2) If any oil or hydrocarbons reach the above-described facility, the operator is required to notify the appropriate District Office of the OCD with 24 hours.

Operator proposes the following alternate protective measures: _____

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature _____ Title **Environmental Specialist** Date 10/31/03

Printed Name **Michael K. Lane** Telephone No. **(505) 632-4625**

E-mail Address Michael.K.Lane@Williams.com

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected _____ Approved by _____

Inspected by _____ Title _____

Date _____

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

July 31, 2003

Mr. Michael K. Lane
Williams Field Services
188 CR 4900
Bloomfield, New Mexico 87413

RE: Site Modification Approval
GW-045, Kutz Canyon Gas Plant
San Juan County, New Mexico

Dear Mr. Lane:

The OCD has received the site modification letter and site plan, dated July 22, 2003, from Williams Field Services for the Kutz Canyon Gas Plant GW-045 located in NW/4, Section 13, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. The request to locate an additional slop glycol storage tank at the site is **hereby approved and is considered a minor modification to the current discharge permit.**

Please note that 20 NMAC 6.2.3104 of the regulations requires that **"When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."** Pursuant to 20 NMAC 6.2.3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. Further, this approval does not relieve Williams Field Services from liability should operations result in contamination to the environment.

Sincerely,

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

cc: Mr. Denny Foust - Aztec District Office

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

July 22, 2003

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

RE: Request to add a Slop Glycol Tank (T-15206)
Plant Discharge Plan: GW-045
Kutz Canyon Gas Plant, San Juan County, NM

This correspondence is to request permission to locate an additional slop glycol storage tank at the reference facility. The tank will have a 1,000 gallon capacity, located within a block and concrete secondary containment, and will be identified as (T-15206). Refer to the attached Figure (KTZ-1-P7) from the Discharge Plan (February 2003).

A revised copy of Table 2 of the reference Discharge Plan is included with this request.

If there are any questions or additional information is requested, please contact me at (505) 632-4625.

Respectfully submitted,

Michael Lane
Williams Energy Services
Four Corners Area Environmental Specialist

Encl:

XC: Ed Shinpock, Maintenance Tech
Kutz Environmental File: 220

TABLE 2 Continued
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
KUTZ PLANT
NMOCD Discharge Plan GW-045
Revised 7/22/2003

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Lube Oil (Tank 65)	Above Ground Storage Tank	2,930 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol (R&G)	Above Ground Storage Tank	1,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol (North R)	Above Ground Storage Tank	1,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol	Above Ground Storage Tanks	(2) 90,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Lube Oil	Above Ground Storage Tank	500 gallons	Metal Tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Gasoline	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Petroleum Solvent	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Refrigerant Grade Propane	Above Ground Storage Tanks	20,000 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Propane	Above Ground Storage Tanks	80,000 gallons	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Y-Product	Above Ground Storage Tanks	(2) 80,000 gallons	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Slop Glycol	**Above Ground Storage Tanks**	**1,000 gallons (T-15206)**	**Concrete Block Walls with Concrete Floor**	**N/A**	**Off-spec material recycled or disposed consistent with applicable regulations.**

Note: Slop glycol tank added July 2003.

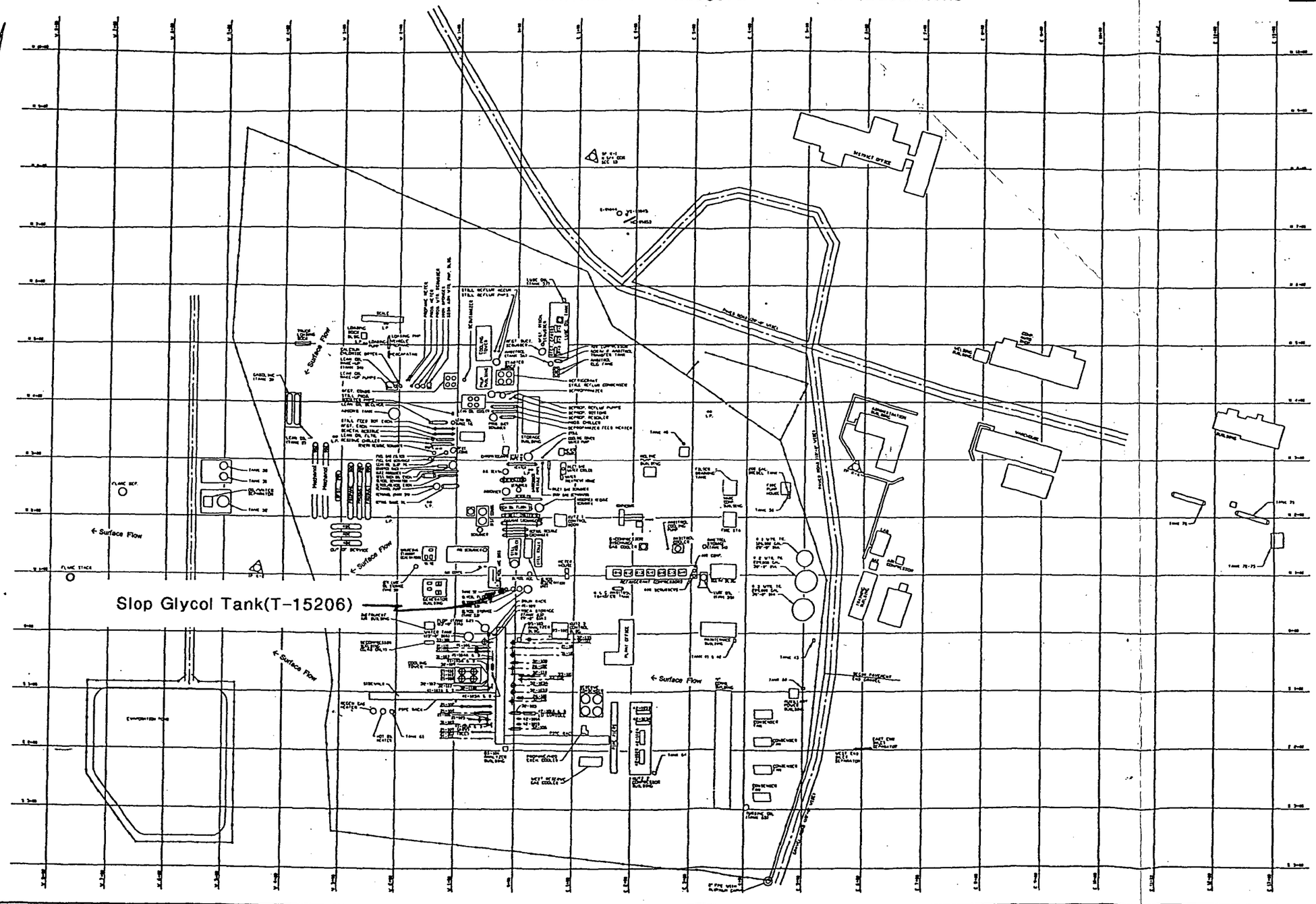
SPILL PREVENTION CONTROL & COUNT[illegible] PLAN

OPERATIONS

KUTZ GAS CONDITIONING PLANT & COGEN

Section	Tab	Document No.
EMERGENCY OPERATIONS PROCEDURES	13	42 13.001
Effective Date	Issue No.	Page No.
3/27/98	03	5of 7

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS



EQUIPMENT KEY LIST

41-109	ANTI FOAM FEED PUMP
33-101	LUBE OIL TANK
41-106	DEA MAKEUP PUMP
21-111	LEAN/RICH EXCHANGER
21-116	DEA STRIPPER REBOILER
41-104 A&B	DEA STRIPPER BOTTOMS PUMPS
31-107	DEA STRIPPER
41-105 A&B	LEAN DEA BOOSTER PUMP
32-109	DEA STRIPPER OVERHEAD ACCUMULATOR
21-110	LEAN DEA COOLER
21-112	DEA STRIPPER OVERHEAD CONDENSER
21-108	REGENERATION GAS COOLER
32-107	REGEN GAS SCRUBBER
32-117	INSTRUMENT AIR SCRUBBER
32-118	HOT OIL SURGE TANK
41-107 A&B	HOT OIL PUMPS
41-103 A&B	DEA STRIPPER REFLUX PUMPS
21-102	RICH DEA FILTER
21-104	GAS CHILLER
21-106	COLD GAS/GAS LIQUID EXCHANGER
21-105	COLD GAS/GAS LIQUID EXCHANGER
31-103	DEMETHANIZER
41-101 A&B	DEMETHANIZER BOTTOMS PUMPS
21-109(ABOVE)	DEMETHANIZER TRIM REBOILER
21-103(BELOW)	DEMETHANIZER REBOILER
21-114	DEMETHANIZER PRODUCT CHILLER
85-104	ANALYZER BUILDING
85-102	CONTROL BUILDING
32-135	CONTACTOR OVERHEAD SCRUBBER
32-101	INLET GAS FILTER SEPARATOR
21-101	DEA CONTACTOR INLET GAS EXCHANGER
31-101	DEA CONTACTOR
32-108	RICH DEA FLASH TANK
26-102	RICH DEA FILTER
32-114	LOW PRESSURE FUEL GAS SCRUBBER
33-101	LUBE OIL TANK
33-102	TREATED GAS FILTER SEPARATOR
32-103A	INLET GAS DEHYDRATOR
32-103B	INLET GAS DEHYDRATOR
26-101	DEHYDRATOR OUTLET FILTER
32-116	EXPANDER COMPRESSOR SUCTION SCRUBBER
32-105	HIGH PRESSURE SEPERATOR
42-101A	FIRST STAGE EXPANDER/COMPRESSOR
42-101B	SECOND STAGE EXPANDER/COMPRESSOR
42-102A	K4
42-102B	K5
42-103A	K6
42-103B	K7
21-113	REFRIGERANT CONDENSER

NO.	DATE	BY	DESCRIPTION	V.O.NO.	CHK.	APP.
2	3/27/98	BCS	ADDED TANK NUMBERS AND DESCRIPTIONS			
1	06/11/97	BCS	COD DRAWING REDRAWN ON 24" x 36" BORDER			

REVISIONS

DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE

REFERENCE DRAWINGS

REFERENCE DRAWINGS

DRAFTING	BY	DATE
DRAWN BY	BCS	6/11/97
CHECKED BY		
APPROVED BY		
ENGINEER	BY	DATE
DESIGNED BY		
PROJ. APPROVED		

STATE: NEW MEXICO
COUNTY: SAN JUAN

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

KUTZ GAS CONDITIONING PLANT
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
PLOT PLAN

SCALE: 1" = 80'-0"
V.O. NO.
DWG NO. KTZ-1-P7
SHEET OF
REV 02

S:\Wfsds\PM_ .TZ\EOD\00070102 Fri Apr 03 10:32:29 1998

Environmental Affairs
188 CR 4900
Bloomfield, NM 87413
505/632-4606
505/632-4781 Fax

July 14, 2003

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

Re: Discharge Plan GW-045, -129, -133, -134, -155, -292, -293, and -306

Dear Mr. Ford:

Enclosed please find the signed copy of the discharge plan conditions for the Williams Field Services (WFS) Kutz Canyon Gas Plant, Crouch Mesa CDP, 30-8 CDP, Decker Junction CS, Aztec CDP, Rosa #1 CS, Gallegos, CS, and Trunk N CS. Also included is the flat fee required by the approval conditions.

Williams Field Services appreciates your assistance in handling this and processing the fees. If you have any questions or require additional information, please contact me at 505/632/4606.

Thank you,

Clara M Garcia
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. 350010862 dated 6-26-03,

or cash received on _____ in the amount of $ 13,300 —

from Williams Field Services

for See attached cover letter (Combines w/check #350011221)
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal ✓

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

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

Williams

WILLIAMS FIELD SERVICES COMPANY
P.O. Box 21218 Tulsa, OK 74121-1218

350010862

DATE 06/26/2003

PAY TO THE ORDER OF:

PAY ➔ *****$13,300.00

WATER MANAGEMENT QUALITY MANAGEMENT FUND
C/O OIL CONSERVATION DIV
1220 S ST FRANCIS DR

SANTA FE NM 87505
United States

Bank One, NA
Illinois

Authorized Signer

VOID VOID VOID VOID VOID VOID VOID VOID VOID VOID VOID VOID

⑈350010862⑈ ⑆071923226⑆ 940116 7⑈

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. 3500012211 dated 7-11-03,

or cash received on ______________ in the amount of $ 2,600.00

from Williams Field Services

for See attached cover letter

Submitted by: (Facility Name) [signature] Date: (DP No.) 7-17-03

Submitted to ASD by: ______________ Date: ______________

Received in ASD by: ______________ Date: ______________

Filing Fee ____ New Facility ____ Renewal ✓

Modification ____ Other ______________ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ____

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

Williams

WILLIAMS FIELD SERVICES COMPANY
P. O. Box 21218, Tulsa, OK 74121-1218

3500012211

DATE 07/11/2003

PAY TO THE ORDER OF:

PAY → ******$2,600.00

WATER MANAGEMENT QUALITY MANAGEMENT FUND
C/O OIL CONSERVATION DIV
1220 S ST FRANCIS DR

SANTA FE NM 87505
United States

Bank One, NA
Illinois

Authorized Signer

⑈3500012211⑈ ⑆071923226⑆ 9401167⑈

INVOICE NUMBER	INVOICE [redacted]TE	BATCH NAME	INVOICE [redacted]CRIPTION	NET AMOUNT
GW129293	20030630	IMAGING-PATH-10-JUL-03	DIFF OF FLAT FEE	2,600.00

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
3500012211	07/11/2003	94141	WATER MANAGEMENT QUALITY MANAGEMENT FUND	$2,600.00

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
24-JUN-03	20030624	IMAGING-PATH-25-JUN-03	RENEWAL APPLICATION	13,300.00

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
3500010862	06/26/2003	94141	WATER MANAGEMENT QUALITY MANAGEMENT FUND	$13,300.00

AFFIDAVIT OF PUBLICATION

Ad No. 48168

STATE OF NEW MEXICO
County of San Juan:

CONNIE PRUITT, being duly sworn says: That she is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meeting of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s): Monday, June 30, 2003.

And the cost of the publication is $175.39

Connie Pruitt

ON 6-30-03 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Donna Beck

My Commission Expires April 2, 2004.

COPY OF PUBLICATION

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 permit application(s) has been submitted to the Director of the Oil Conservation Division, 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-045) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services Kutz Canyon Gas Processing Plant facility located in the SW/4 of Section 12, NE/4 of Section 13, SE/4 of Section 14, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1 to 1.5 million gallons per year of process waste water is disposed of in an OCD approved double lined evaporation pond with leak detection. The total dissolved solids (TDS) of the waste water is approximately 1,500 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is shallow perched water with TDS concentrations ranging from 8,000 to 18,000 mg/l. Deeper ground water is at a depth of 200 feet with estimated total dissolved solids concentration ranging from 2,000 to 4,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.
(GW-129) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services Crouch Mesa CDP Compressor Station located in the SE/4 NE/4 of Section 23, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 barrels per year of processed water is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 200 feet with estimated 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-133) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services 30-8 CDP Compressor Station located in the SW/4 SE/4 of Section 32, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 barrels per year of processed water is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 220 feet with estimated 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-134) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services Decker Junction Compressor Station located in the NE/4 SE/4 of Section 19, Township 32 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 barrels per year of processed water is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 30 feet with estimated 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-155) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR

4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services Aztec CDP Compressor Station located in the SW/4 SW/4 of Section 8, Township 32 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 barrels per year of processed water is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 50 feet with estimated 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-306) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services Trunk N Compressor Station located in the NW/4 NE/4 of Section 8, Township 32 North, Range 7 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 barrels per year of processed water is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 200 feet with estimated 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-292) - Williams Field Services, Michael K. Lane, (505) 632-4625, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge renewal application for the Williams Field Services facility located on the boundary of the NE/4 NE/4 of Section 7 and the NW/4 NW/4 of Seciton 8, Township 31 North, Range 6 West, NMPM, San Juan County, New Mexico. Approximately 2,400 gallons per year of waste water is collected in a fiberglass storage tank then transported offsite for disposal. Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of approximately 300 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.

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 permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's web site http://www.emnrd.state.nm.us/ocd/. Prior to ruling on any proposed discharge permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 17th day of June 2003.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

LORI WROTENBERY, Director

Legal No. 48168 published in The Daily Times, Farmington, New Mexico on Monday, June 30, 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 permit application(s) has been submitted to the Director of the Oil Conservation Division, 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-296) – Flatrock Energy Partners on behalf of Raptor Gas Transmission LLC, operated by ConocoPhillips Midstream Operations, Joyce Miley, (281) 293-4498, P.O. Box 2197-Humble 3036, Houston, Texas 77252-2197, has submitted a discharge permit renewal application for the Cedar Canyon Compressor Station located in the SE/4 SE/4 of Section 9, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1000 mg/l. Natural gas products, waste oil and water is stored in above ground tanks prior to being transported off-site to OCD approved facilities. 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.

(GW-143) – Flatrock Energy Partners on behalf of Raptor Gas Transmission LLC, operated by ConocoPhillips Midstream Operations, Joyce Miley, (281) 293-4498, P.O. Box 2197-Humble 3036, Houston, Texas 77252-2197, has submitted a discharge permit renewal application for the Cal Mon Compressor S[illegible]n located in the [illegible]/4 NW/4 of Section 35, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentration of approximately 3500 mg/l. Natural gas products, waste oil and water are stored in above ground tanks prior to being transported off-site to OCD approved facilities. 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.

(GW-136) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services 29-7 #1 CDP Compressor Station located in the NE/4 SE/4 of Section 15, Township 29 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 5000 to 15000 gallons per year of waste water is stored in an above ground storage tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 50 to 200 feet with estimated 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-149) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services El Cedro Compressor Station located in the NW/4 of Section 31, Township 29 North, Range 5 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 barrels per year of processed water is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of approximately 145 feet with estimated 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-295) – Smith Services (formerly B & B Machine Shop), Mr. Maurice Sticker, (505) 393-4964, 1120 West Bender Blvd., Hobbs, New Mexico 88240, has submitted a discharge renewal application for the Smith Services (formerly B & B Machine Shop) Hobbs Facility located in Section 21, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 30 gallons per month of waste motor oils are collected in drums then transported offsite for disposal. Approximately 2 gallons per month of used solvents are recycled on site. Scrap metals are collected in barrels and transported off site for recycling. Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of 50 feet with a total dissolved solids concentration ranging from 390 to 480 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-045) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services Kutz Canyon Gas Processing Plant facility located in the SW/4 of Section 12, NE/4 of Section 13, SE[illegible] of Section 14, Tow[illegible]ip 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1 to 1.5 million gallons per year of process waste water is disposed of in an OCD approved double lined evaporation pond with leak detection. The total dissolved solids (TDS) of the waste water is approximately 1,500 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is shallow perched water with TDS concentrations ranging from 8,000 to 18,000 mg/l. Deeper ground water is at a depth of 200 feet with estimated total dissolved solids concentration ranging from 2,000 to 4,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-129) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services Crouch Mesa CDP Compressor Station located in the SE/4 NE/4 of Section 23, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 barrels per year of processed water is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 200 feet with estimated 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-133) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams Field Services 30-8 CDP Compressor Station located in the SW/4 SE/4 of Section 32, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 barrels per year of processed water is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. The total dissolved solids (TDS) of the waste water is approximately 1,100 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is at a depth of 220 feet with estimated 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-134) - Williams Field Services, Michael K. Lane, (505) 632-4625, 118 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for the Williams

Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of approximately 300 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-293) - Williams Field Services, Michael K. Lane, (505) 632-4625, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge renewal application for the Williams Field Services Gallegos compressor station facility located in the NW/4 NW/4 of Section 7, Township 25 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 200 gallons per year of waste water is collected in a fiberglass storage tank then transported offsite for disposal. Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of 200 feet or more with a total dissolved solids concentration of approximately 3,700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No 3500002622 dated 3/14/03,

or cash received on ____________ in the amount of $ 600.00

from Williams Field Services

for See attached

(Facility Name)

Submitted by: [signature] Date: 3/21/03 (DP No.)

Submitted to ASD by: ____________ Date: ____________

Received in ASD by: ____________ Date: ____________

Filing Fee ✓ New Facility ___ Renewal ✓

Modification ___ Other ____________ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

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

Williams

WILLIAMS FIELD SERVICES COMPANY
P O BOX 21218 • Tulsa OK 74121-1218

A/C 9401167

3500002622

DATE 03/14/2003

PAY TO THE ORDER OF:

PAY ➡ ********$600.00

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

SANTA FE NM 87505
United States

Bank One, NA
Illinois

[signature]
Authorized Signer

⑈3500002622⑈ ⑆071923226⑆ 9401167⑈

Environmental Affairs
188 CR 4900
Bloomfield, NM 87413
505/632-4606
505/632-4781 Fax

March 19, 2003

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- Application Renewal and Filing Fee

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application renewal and check number 3500002622 for $600.00 to cover the filling fee for the following Williams Field Services (WFS) Compressor Stations:

- 30-8 CDP (GW-133)
- Aztec CDP (GW-155)
- Crouch Mesa CDP (GW-129)
- Decker Junction CS (GW-134)
- Kutz Canyon Plant (GW-045)
- Trunk N CS (GW-306)

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 505/632/4606.

Thank you,

Clara M Garcia
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

☐ New ☑ Renewal ☐ Modification

1. Type: Compressor Station (Kutz Canyon Plant GW-045)

2. Operator: Williams Field Services Company

   Address: 188 CR 4900, Bloomfield, New Mexico 87413

   Contact Person: Michael K. Lane Phone: (505) 632-4625

3. Location: NW/4 Section 13 Township 28 North Range 11 West
   Submit large scale topographic map showing exact location.

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

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

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

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

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

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

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

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

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

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

14. CERTIFICATION

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

   Name: Michael K. Lane Title: Environmental Specialist III

   Signature: _____ for Date: March 19, 2003

DISCHARGE PLAN RENEWAL

KUTZ CANYON PLANT
(GW-045)

Williams Field Services Company

February 2003

Table of Contents

List of Tables

List of Figures - All figures follow Section XI

List of Appendices

I. TYPE OF OPERATION

This facility is classified as a natural gas processing plant. The plant removes ethane and higher hydrocarbons from field natural gas. The hydrocarbons that are removed are marketed in several places. The residual natural gas is also marketed by another company. Williams purchased the plant in 1995.

II. LEGALLY RESPONSIBLE PARTY

Williams Field Services
188 CR 4900
Bloomfield, NM 87413
(505) 632-4625

Contact Person:
Michael K. Lane, Senior Environmental Specialist
Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Kutz Canyon Plant is located in Section 13, Township 28 North, Range 11 West, in San Juan County, New Mexico, approximately 3 miles south of Bloomfield, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangle: Bloomfield, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

IV. LANDOWNER

Williams Field Services is leasing the subject property from:

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

V. FACILITY DESCRIPTION

The Plant was originally constructed in 1949. The Plant consists of two different extraction systems to remove ethane and higher hydrocarbons from field natural gas. The Kutz #1 Processing Unit was built in 1949 with a designed unit capacity for 120 million cubic feet of gas per day using refrigerated oil absorption process. An upgrade and new extraction system, the Kutz #2 Processing Unit was added in 1976. The Kutz #2 unit was designed for a cryogenic process and has a capacity of approximately 80 mmcf/d. Both units are currently active. The hydrocarbons that are removed are marketed in several places. The residual natural gas is also marketed by another company.

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

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

TABLE 1
SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS
KUTZ CANYON PLANT

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Engines, Compressors, Oil/Water Separator	1,000–5,000 gallons/month	Used motor oil w/no additives
Used Solvent	Parts Cleaner	0-500 gal/year	No additives
Condensate & Natural Gasoline	Gas Conditioning Process	40,000-100,000 gallons/month	No additives
Condensate	Flare Separator	2,000-5,000 gallons/month	Hydrocarbons with traces of glycol and amine
Condensate/Amine	Flare Separator	2,000-5,000 gallons/month	Hydrocarbons with amine
Waste Water	Cooling Tower, Filter Separator, Open Drain System/Wash Down water, Produced Water, Kutz 2 Control Room Sink, Iron Sponge Process Water, Oil/Water Separator	1-1.5 million gallons/year	High TDS water, dissolved salts, traces of amine, glycol and oil
Used Oil Filters	Engines and Compressors	500-1,000 filters/year	No additives
Used Process Filters	Air, Inlet, Fuel Gas, CO_2 and Hydrocarbon Removal	500-1,500/year	No additives
Empty Drums / Containers	Liquid Containers	200-800/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Mole Sieve	Used in removal of water from Natural gas stream	20,000-25,000 lbs/yr	No additives
Used Iron Sponge	H2S Treatment System	500-1,000 bushels/yr	No additives
Used Carbon	Amine System	4,000-6,000 lbs/yr	No additives
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

VII. TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND WASTE SOLIDS

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

TABLE 2
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
KUTZ CANYON PLANT

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Waste Water	Pond	N/A	Double Lined	Non-exempt	Liquids are directed to the pond for evaporation. Liquids may be transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility.
Natural Gasoline (Tank 3)	Above Ground Storage Tank	19,000 gallons	Concrete Wall with Earthen Floor	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Amine/Gasoline Slop (Tank 30)	Above Ground Storage Tank	8,820 gallons	Metal Walls with Earthen Floor	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Used Oil/Water Slop (Tank 31)	Above Ground Storage Tank	4,200 gallons	Metal Walls with Earthen Floor	Non-exempt	Transported to an EPA-registered used oil marketer for recycling or disposal at an approved disposal facility.
Waste Water (Tank 32)	Above Ground Storage Tank	10,500 gallons	Metal Walls with Earthen Floor	Non-exempt	Liquids are directed to the pond for evaporation. Liquids may be transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility.
Used Oil/Amine/ Glycol (Tank 40)	Above Ground Storage Tank	1,000 gallons	Fiberglass Tank	Non-exempt	Transported to an EPA-registered used oil marketer for recycling or disposal at an approved disposal facility.
Condensate (Tank 52)	Above Ground Storage Tank	2,000 gallons	Metal Walls with Earthen Floor	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Used Oil (Tank 40)	Above Ground Storage Tank	2,000 gallons	Concrete Wall with Earthen Floor	Non-exempt	May be hauled to a WFS or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.
Compressor Used Oil	Above Ground Storage Tank	500 gallons	Metal Tank	Non-exempt	May be hauled to a WFS or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Roll off bin or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.

TABLE 2 Continued
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
KUTZ PLANT

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Absorbents	Roll off bin or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Used Process Filters	Roll off bin or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Drained, transported to a WFS or contractor consolidation point, 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	Concrete Walls with Earthen Floor	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Mole Sieve	Roll off bin or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Used Carbon	Roll off bin or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Lean Oil (Tank 2)	Above Ground Storage Tanks	19,900 gallons	Concrete Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol (Tank 3)	Above Ground Storage Tanks	19,900 gallons	Concrete Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel (Tank 50)	Above Ground Storage Tanks	1,000 gallons 200 gallons	Concrete Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil (Tank 51)	Above Ground Storage Tank	3,000 gallons	Concrete Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

TABLE 2 Continued
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
KUTZ PLANT

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Ethylene Glycol (Tank 53)	Above Ground Storage Tank	8,000 gallons	Concrete Block Walls with Concrete Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ethylene Glycol (Tank 53)	Above Ground Storage Tank	1,800 gallons	Concrete Block Walls with Concrete Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol (Tank 54)	Above Ground Storage Tanks	3,300 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil (Tank 55)	Above Ground Storage Tanks	5,870 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol (Tank 56)	Above Ground Storage Tanks	2,750 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil (Tank 57)	Above Ground Storage Tank	3,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lean Oil (Tank 58)	Above Ground Storage Tank	10,330 gallons	Metal Walls with Concrete Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol (Tank 59)	Above Ground Storage Tank	4,510 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel (Tank 60)	Above Ground Storage Tanks	1000 & 1500 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diethylene Glycol (Tank 61)	Above Ground Storage Tank	705 gallons	Concrete Block Walls with Concrete Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Amine (Tank 62)	Above Ground Storage Tanks	8,000 & 4,200 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Defoamer (Tank 62)	Above Ground Storage Tank	500 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Amine (Tank 63)	Above Ground Storage Tank	8,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil (Tank 64)	Above Ground Storage Tank	2,920 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

TABLE 2 Continued
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
KUTZ PLANT

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Lube Oil (Tank 65)	Above Ground Storage Tank	2,930 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol (R&G)	Above Ground Storage Tank	1,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol (North R)	Above Ground Storage Tank	1,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol	Above Ground Storage Tanks	(2) 90,000 gallons	Metal Walls with Earthen Floor	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Lube Oil	Above Ground Storage Tank	500 gallons	Metal Tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Gasoline	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Petroleum Solvent	Above Ground Storage Tanks	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Refrigerant Grade Propane	Above Ground Storage Tanks	20,000 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Propane	Above Ground Storage Tanks	80,000 gallons	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Y-Product	Above Ground Storage Tanks	(2) 80,000 gallons	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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.

VIII. STORM WATER PLAN

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

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

Site Assessment and Facility Controls

An evaluation of the material used and stored on this site that may be exposed to storm water indicates that no materials would routinely be exposed to precipitation. The process units have a waste water system which channels process, floor drain, and cooling tower waste waters into the lined evaporation pond located at the southwest corner of the plant.

Storm water flows from the facility via culverts and trenches into the storm water impoundment located west of the facility. Any leakage or spill that is not contained in the vicinity of the source would be contained by storm water impoundment pond. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.

Best Management Practices

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

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

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

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

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

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

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

IX. INSPECTION, MAINTENANCE AND REPORTING

WFS's personnel will operate and maintain the compression unit at the facility. The facility will be manned and monitored 24hours per day onsite for equipment malfunctions. The facility equipment is visually inspected on a daily basis. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

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

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

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

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

XI. SITE CHARACTERISTICS

The Kutz Canyon Plant is located approximately 3 miles south of Bloomfield, New Mexico. The site elevation is approximately 5,800 feet above mean sea level. The natural ground surface topography slopes downward toward the west. The maximum relief over the site is approximately 30 feet. Intermittent flow from the site will follow natural drainage west to Kutz Canyon Wash. Kutz Canyon Wash drains to the north into San Juan River. The San Juan River, approximately 4.3 miles to the northwest of the site, is nearest down-gradient perennial source of surface water at an elevation of approximately 5,380 feet.

A review of the available hydrologic data[1,2] for this area revealed that there are no water wells within a one-mile radius of the Kutz Canyon Plant. The water-bearing unit in the area is the Nacimiento Formation. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 200 to 500 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

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

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

References

[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, 2000.

XII. FACILITY CLOSURE PLAN

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

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

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

FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLAN

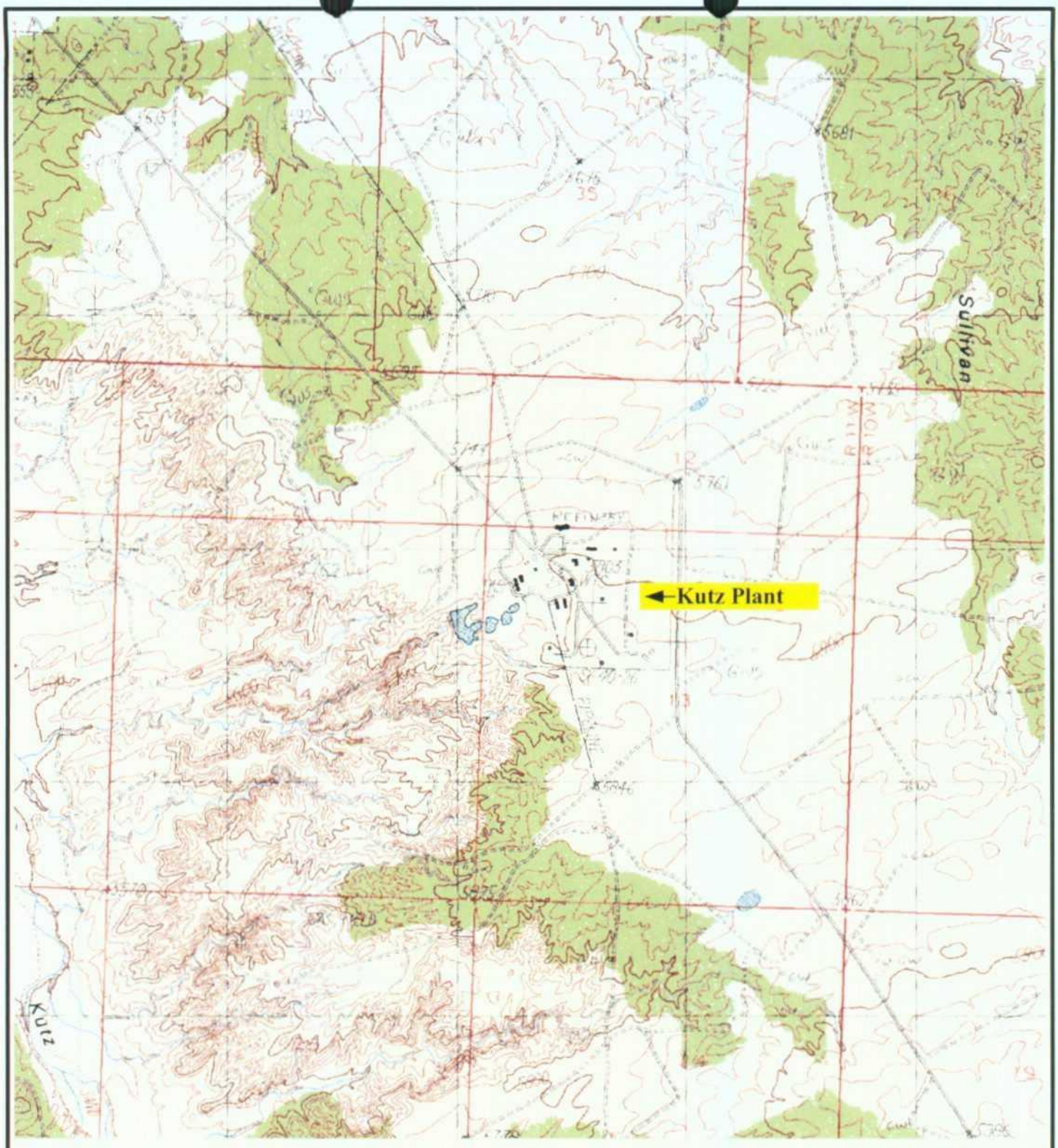


Figure 1 Site Vicinity / Topographic Map

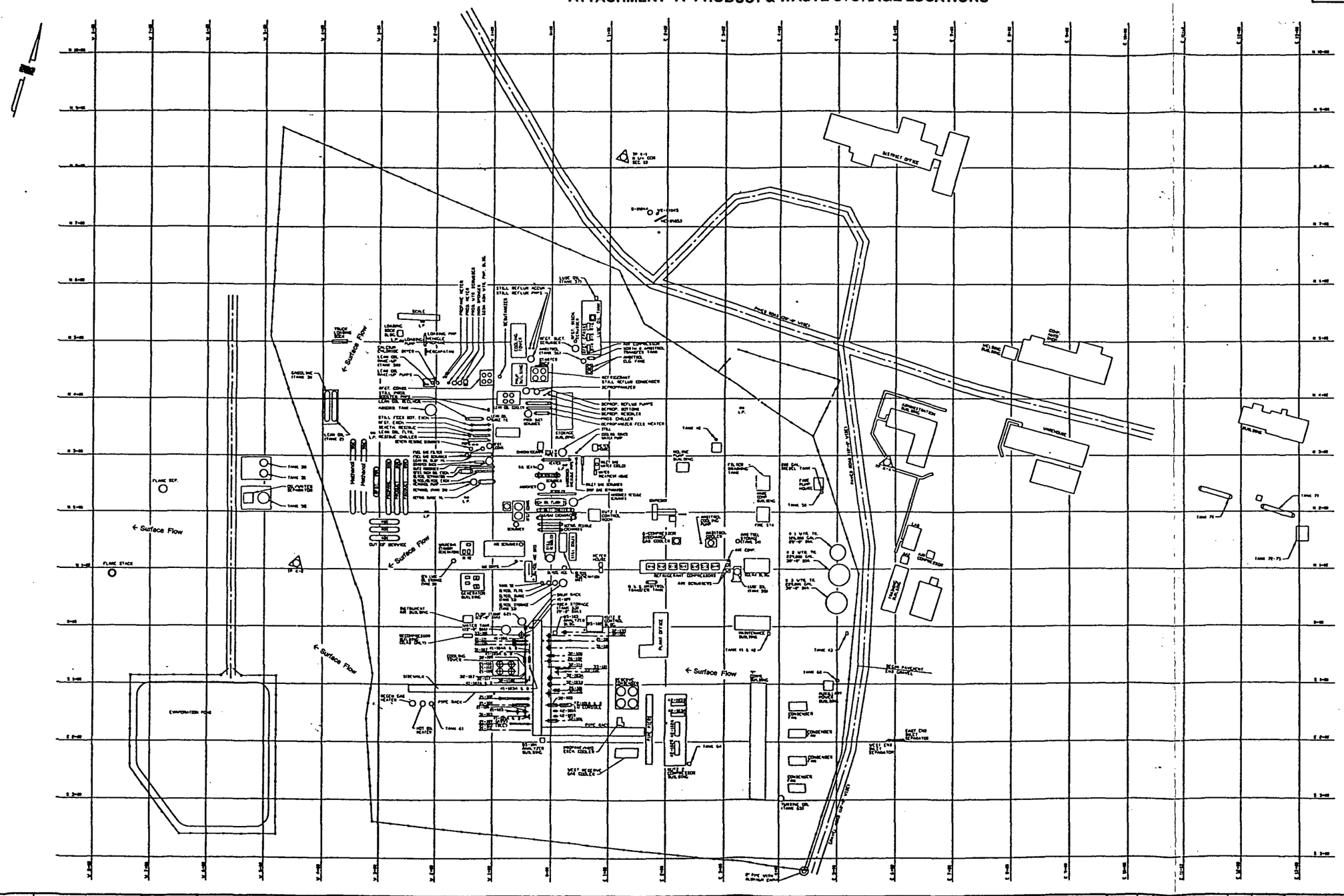
Kutz Plant

Section 13, Township 28N Range 11W

San Juan County, New Mexico

OPERATIONS		
Project: KUTZ GAS CONDITIONING PLANT & COGEN		
Section: EMERGENCY OPERATIONS PROCEDURES	Tab: 13	Document No.: 42.13.001
Effective Date: 3/27/98	Issue No.: 03	Page No.: 5 of 7

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS



EQUIPMENT KEY LIST

41-109 ANTI FOAM FEED PUMP
33-101 LUBE OIL TANK
41-106 DEA MAKEUP PUMP
21-111 LEAN/RICH EXCHANGER
21-116 DEA STRIPPER REBOILER
41-104 A&B DEA STRIPPER BOTTOMS PUMPS
31-107 DEA STRIPPER
41-105 A&B LEAN DEA BOOSTER PUMP
32-109 DEA STRIPPER OVERHEAD ACCUMULATOR
21-110 LEAN DEA COOLER
21-112 DEA STRIPPER OVERHEAD CONDENSER
21-108 REGENERATION GAS COOLER
32-107 REGEN GAS SCRUBBER
32-117 INSTRUMENT AIR SCRUBBER
32-118 HOT OIL SURGE TANK
41-107 A&B HOT OIL PUMPS
41-103 A&B DEA STRIPPER REFLUX PUMPS
21-102 RICH DEA FILTER
21-104 GAS CHILLER
21-106 COLD GAS/GAS LIQUID EXCHANGER
21-105 COLD GAS/GAS LIQUID EXCHANGER
31-103 DEMETHANIZER
41-101 A&B DEMETHANIZER BOTTOMS PUMPS
21-109(ABOVE) DEMETHANIZER TRIM REBOILER
21-102(BELOW) DEMETHANIZER REBOILER
21-114 DEMETHANIZER PRODUCT CHILLER
65-104 ANALYZER BUILDING
65-102 CONTROL BUILDING
32-135 CONTACTOR OVERHEAD SCRUBBER
32-101 INLET GAS FILTER SEPARATOR
21-101 DEA CONTACTOR INLET GAS EXCHANGER
31-101 DEA CONTACTOR
32-108 RICH DEA FLASH TANK
26-102 RICH DEA FILTER
32-114 LOW PRESSURE FUEL GAS SCRUBBER
33-101 LUBE OIL TANK
33-102 TREATED GAS FILTER SEPARATOR
32-103A INLET GAS DEHYDRATOR
32-103B INLET GAS DEHYDRATOR
26-101 DEHYDRATOR OUTLET FILTER
32-116 EXPANDER COMPRESSOR SUCTION SCRUBBER
32-105 HIGH PRESSURE SEPERATOR
42-101A FIRST STAGE EXPANDER/COMPRESSOR
42-101B SECOND STAGE EXPANDER/COMPRESSOR
42-102A K4
42-102B K5
42-103A K6
42-103B K7
21-113 REFRIGERANT CONDENSER

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REFERENCE DRAWINGS				REFERENCE DRAWINGS				REVISIONS											
DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE	NO.	DATE	BY	DESCRIPTION	V.D.NO.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	V.D.NO.	CHK.	APP.
															2	3/27/98	BCS	ADDED TANK NUMBERS AND DESCRIPTIONS			
															1	06/11/97	BCS	COG DRAWING REDRAWN ON 24" x 36" BORDER			

DRAFTING	BY	DATE
DRAWN BY	BCS	6/11/97
CHECKED BY		
APPROVED BY		
ENGINEER	BY	DATE
DESIGNED BY		
PROJ. APPROVED		

STATE: NEW MEXICO
COUNTY: SAN JUAN

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

KUTZ GAS CONDITIONING PLANT
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
PLOT PLAN

SCALE: 1" = 80'-0"
V.D. NO.
DWG NO. KTZ-1-P7
SHEET 01
REV 02

APPENDIX A

SPILL CONTROL PROCEDURES

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

▸ Document History (ISO9001)

▾ Document Body

1.0 PURPOSE AND SCOPE

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

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

2.0 CONTENTS

3.0 POLICY

3.1 GENERAL

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

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

3.1.3 Hazardous Substance, for purposes of this procedure, is defined as any chemical or

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

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

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

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

d. Section 112 of the Clean Air Act

e. Section 7 of the Toxic Substance Control Act

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

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

3.1.6 Facilities which are subject to the requirements stated in this policy are as follows:

a. Non-Transportation Related Facilities

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

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

b. Transportation Related Facilities

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

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

3.1.8 The facility superintendent is responsible for spill prevention. His/her duties include,

but are not limited to, the following:

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

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

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

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

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

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

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

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

3.2 BULK STORAGE TANKS

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

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

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

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

3.3 FACILITY DRAINAGE

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

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

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

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

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

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

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

3.3.5 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

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

3.4.1 Aboveground valves and pipelines should be examined regularly by operating

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

3.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

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

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

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

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

4.0 PROCEDURE

4.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of Oil or Hazardous Substance

Any Employee

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

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

1. Release reaches or may reach surface water: (pond, lake, wash or ground water

2. Release leaves Williams property

3. Release is of questionable nature (i.e., unknown product, unknown hazards)

II. Onsite Releases of Certain Common Industrial Materials Above 10 Gallon Threshold Are Reportable.
Releases that do not migrate off-site or reach surface water may require reporting as well. All releases of 10 gallons or greater of the following materials should be contained and promptly reported to Gas Control:

- Ammonia
- Antifreeze
- Amine

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

III. Releases of Certain Other Materials Reportable:

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

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

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

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

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

a. Name of company facility and/or location of facility and nature of discharge or spill

b. Description and quantity of emission or substance discharged

c. Description of the circumstances causing the discharge or spill

d. Name, title and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control

e. Action taken or being taken to mitigate and correct discharge or spill

f. Water bodies or streams involved

g. Time and duration of discharge or spill

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

Gas Control Personnel

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

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

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

Facility Superintendent

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

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

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

Environmental Affairs

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

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

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

4.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Superintendent or Designee

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

a. Time and date of discharge or spill

b. Facility name and location

c. Type of material spilled

d. Quantity of material spilled

e. Area affected

f. Cause of spill

g. Special circumstances

h. Corrective measures taken

i. Description of repairs made

j. Preventative measures taken to prevent recurrence.

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

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

ATTACHMENT A
DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS

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

	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

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

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 March 17, 1999

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

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

Surface Owner	Mineral Owner	Lease No.☐

LOCATION OF RELEASE

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

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered☐
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery☐
Was Immediate Notice Given? ☐ 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:
Date: Phone:	Conditions of Approval:	Attached ☐

* Attach Additional Sheets If Necessary

APPENDIX C

PUBLIC NOTICE

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

February 5, 2003

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
7002241000000847216

The Navajo Tribe
C/O Office of Navajo Land Administration
PO Box 308
Window Rock AZ 86515

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 Kutz Canyon Plant (GW-045). 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 February 2003.

The facility, located in Section 13, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico, 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 temporally 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 because the estimated ground water depth at the site is 100-300 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

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

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

Respectfully submitted,

Clara M. Garcia
Environmental Compliance

COPY

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

November 20, 2002

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 9246

Mr. Michael K. Lane
Williams Field Services
188 CR 4900
Bloomfield, New Mexico 87413

RE: Discharge Plan Renewal Notice for Williams Field Services Facilities

Dear Mr. Lane:

The OCD is providing Williams Field Services a notice that the following discharge plans expire at various dates during the year 2003.

GW-292 expires 3/4/2003 – Rosa #1 Compressor Station
GW-293 expires 3/4/2003 - Gallegos Compressor Station
GW-133 expires 4/15/2003 – SJ 30-8 #1 CDP Compressor Station
GW-134 expires 4/15/2003 - Decker Junction Compressor Station
GW-136 expires 4/15/2003 - SJ 29-7 #1 CDP Compressor Station
GW-45 expires 6/28/2003 - Kutz Gas Plant
GW-306 expires 7/9/2003 - Trunk N Compressor Station
GW-149 expires 10/8/2003 El Cedro Compressor Station
GW-155 expires 12/13/2003 Aztec CDP Compressor Station

WQCC 20.6.2.3106.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 20.6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $100.00 plus a flat fee based upon the horsepower rating or type of facility for gas processing facilities. The $100.00 filing fee for each facility 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 any of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 476-3489.

Sincerely,

Roger C. Anderson
Oil Conservation Division

cc: OCD Aztec District Office

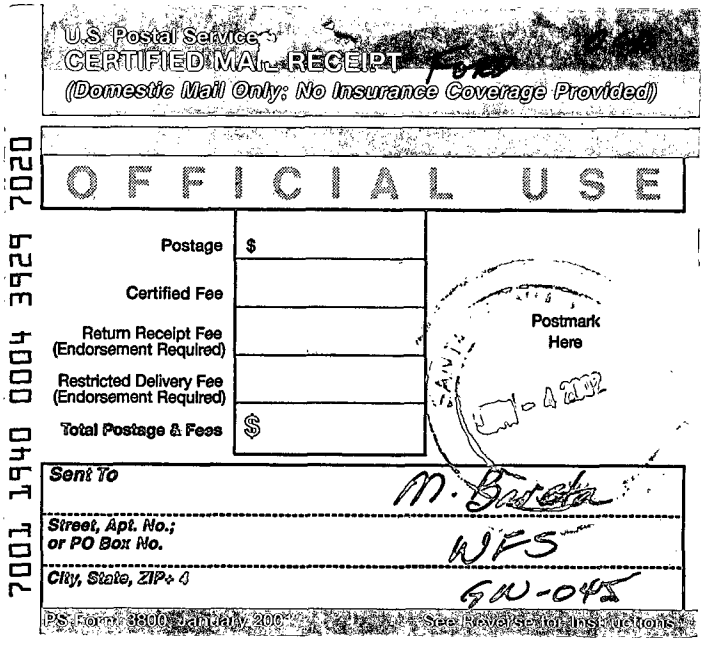
NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

January 4, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 7020



Mr. Mark J. Bareta
Williams Field Services
188 CR 4900
Bloomfield, New Mexico 87413

RE: Site Modification Notification
GW-045, Kutz Gas Plant
San Juan County, New Mexico

Dear Mr. Bareta:

The OCD has received the site modification letter, dated December 19, 2001, from Williams Field Services for the Kutz Gas Plant GW-045 located in SW/4 of Section 12, NW/4 of Section 13, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. **The site modifications are approved without modification to the discharge plan with the stipulation that all modifications comply with the discharge plan renewal approved May 15, 1998.**

Please note that Section 3104 of the regulations requires that **"When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."** Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. Further, this approval does not relieve Williams Field Services from liability should operations result in contamination to the environment.

Sincerely,

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

cc: Mr. Denny Foust - Aztec District Office

Four Corners Area
Environmental Department
#188 CR 4900
Bloomfield, N.M. 87413
Phone: (505) 632-4634
Fax: (505) 632-4781

December 19, 2001

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

Re: **Kutz Plant (GW-045) Discharge Plan Modification**

Dear Mr. Ford:

Please be advised that two – 90,000 gallon propane storage tanks are being converted to methanol storage tanks. An impermeable containment will be constructed to contain at least 133% of the tank capacities. The tank locations are highlighted on attached facility plot plan. Please make note of this change in the facility's Discharge Plan.

If you have any questions or require additional information, I can be reached at (505) 632-4634.

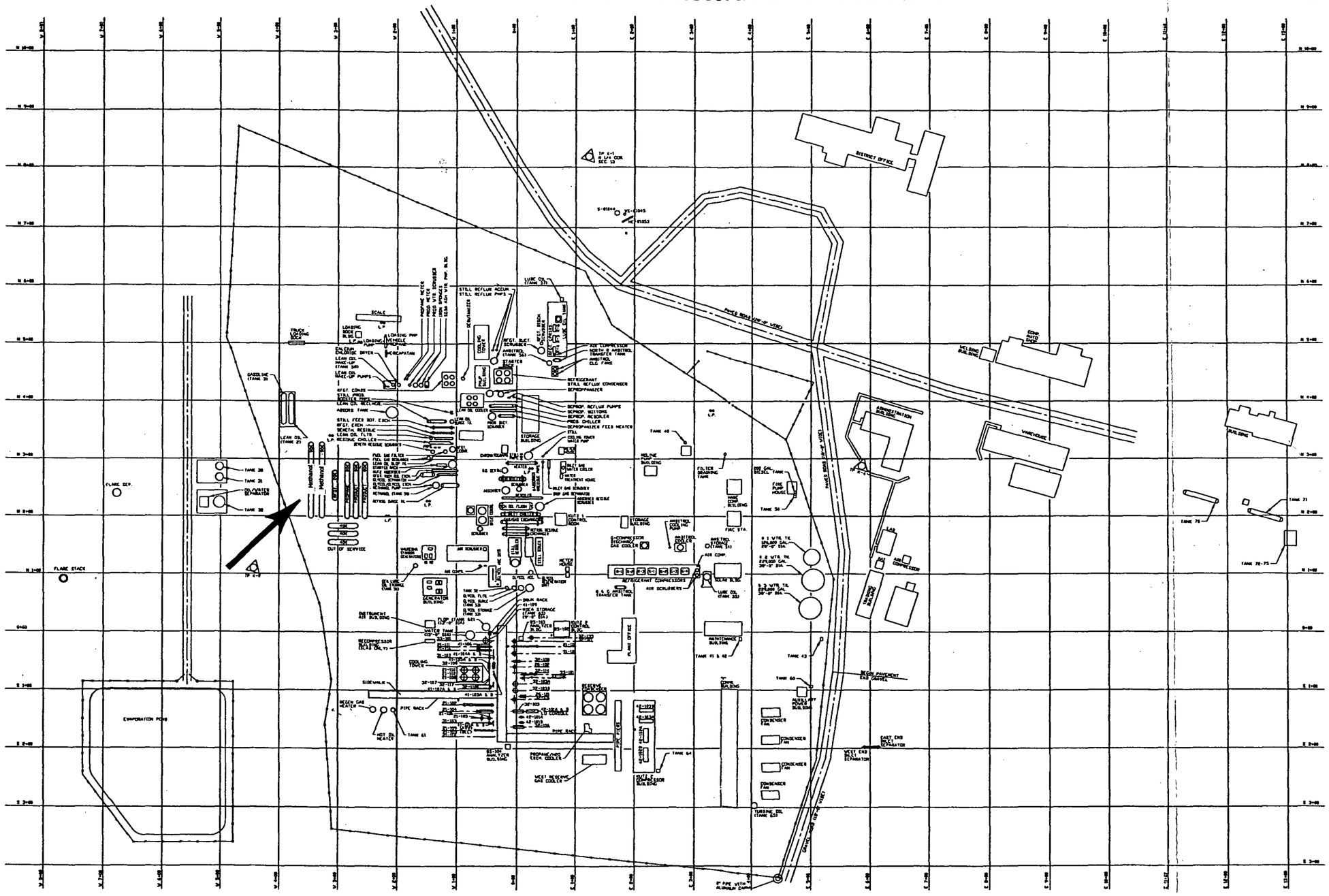
Sincerely,

Mark J. Bareta
Senior Environmental Specialist

Attachment: Kutz Plant Plot Plan
Xc: Denny Foust, Aztec OCD

OPERATIONS			
Manual	KUTZ GAS CONDITIONING PLANT & COGEN		
Section	EMERGENCY OPERATIONS PROCEDURES	Tab 13	Document No. 42.13.001
Effective Date	3/27/98	Issue No. 03	Page No. 5 of 7

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS



EQUIPMENT KEY LIST

41-109 ANTI FOAM FEED PUMP
33-101 LUBE OIL TANK
41-106 DEA MAKEUP PUMP
21-111 LEAN/RICH EXCHANGER
21-116 DEA STRIPPER REBOILER
41-104 A&B DEA STRIPPER BOTTOMS PUMPS
31-107 DEA STRIPPER
41-105 A&B LEAN DEA BOOSTER PUMP
32-109 DEA STRIPPER OVERHEAD ACCUMULATOR
21-110 LEAN DEA COOLER
21-112 DEA STRIPPER OVERHEAD CONDENSER
21-108 REGENERATION GAS COOLER
32-107 REGEN GAS SCRUBBER
32-117 INSTRUMENT AIR SCRUBBER
32-118 HOT OIL SURGE TANK
41-107 A&B HOT OIL PUMPS
41-103 A&B DEA STRIPPER REFLUX PUMPS
21-102 RICH DEA FILTER
21-104 GAS CHILLER
21-106 COLD GAS/GAS LIQUID EXCHANGER
21-105 COLD GAS/GAS LIQUID EXCHANGER
31-103 DEMETHANIZER
41-101 A&B DEMETHANIZER BOTTOMS PUMPS
21-109(ABOVE) DEMETHANIZER TRIM REBOILER
21-103(BELOW) DEMETHANIZER REBOILER
21-114 DEMETHANIZER PRODUCT CHILLER
65-104 ANALYZER BUILDING
65-102 CONTROL BUILDING
32-125 CONTACTOR OVERHEAD SCRUBBER
32-101 INLET GAS FILTER SEPARATOR
21-101 DEA CONTACTOR INLET GAS EXCHANGER
31-101 DEA CONTACTOR
32-108 RICH DEA FLASH TANK
26-102 RICH DEA FILTER
32-114 LOW PRESSURE FUEL GAS SCRUBBER
33-101 LUBE OIL TANK
33-102 TREATED GAS FILTER SEPARATOR
32-103A INLET GAS DEHYDRATOR
32-103B INLET GAS DEHYDRATOR
26-101 DEHYDRATOR OUTLET FILTER
32-116 EXPANDER COMPRESSOR SUCTION SCRUBBER
32-105 HIGH PRESSURE SEPERATOR
42-101A FIRST STAGE EXPANDER/COMPRESSOR
42-101B SECOND STAGE EXPANDER/COMPRESSOR
42-102A K4
42-102B K5
42-103A K6
42-103B K7
21-113 REFRIGERANT CONDENSER

DRAWING NO.	TITLE	DRAWING NO.	TITLE
REFERENCE DRAWINGS			

DRAWING NO.	TITLE	DRAWING NO.	TITLE
REFERENCE DRAWINGS			

NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK.	APP.
2	3/27/98	BES	ADDED TANK NUMBERS AND DESCRIPTIONS			
1	06/11/97	BES	EOD DRAWING REDRAWN ON 24" x 36" BORDER			

REVISIONS

DRAFTING	BY	DATE
DRAWN BY	BES	6/11/97
CHECKED BY		
APPROVED BY		
ENGINEER	BY	DATE
DESIGNED BY		
PROJ. APPROVED		

STATE: NEW MEXICO
COUNTY: SAN JUAN

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

KUTZ GAS CONDITIONING PLANT
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
PLOT PLAN

SCALE: 1" = 80'-0"
W.O. NO.
DWG NO. KTZ-1-P7
SHEET OF
REV 02

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

August 9, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-519

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

Re: Inspection Report
Williams Field Services
GW-045, Kutz Canyon Gas Plant
San Juan County, New Mexico

Dear Ms. Deklau:

The New Mexico Oil Conservation Division (OCD) conducted an un-announced inspection of the Kutz Canyon Gas Plant on July 7, 1999. OCD would like to thank Mr. David Sanders and the various plant personnel for their cooperation during the inspection. Comments from the inspection conducted are as follows:

1. *Drum Storage: All drums that contain materials other than fresh water must be stored on an impermeable pad (i.e. concrete, asphalt, or other suitable containment) with curbing and be labeled for contents. All Empty drums should be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad with curbing.*

   Drums containing fluids were were not properly stored in the building containing the absorbent sock and pad collection tank. Drums were not properly labeled. Plant personnel need to be instructed on the proper storage of empty drums. (Photo #5)

   All drums should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

2. *Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest or all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.*

The above ground tanks that show evidence of some spill/leakage will be inspected on a regular basis in order to prevent leakage from the containment structures.

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

All drums should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

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

Piping and connection joints show evidence of leaks that have spilled onto the ground surface at Kutz #1 and at the oil/water separator. Some type of collection device should be provided to prevent the spillage onto the ground surface. Evidence of spillage was in the process of cleanup at the time of inspection. (Photos #1 & #2)

Sumps around the Kutz #1 compressor building contained trash and fluids which appeared to be free used oil and water. These fluids and trash need to be removed and disposed of properly. A method of collection for leaking used oil should be developed to prevent the used oil fluids from draining into these outside sump areas.

5. *Waste Disposal:*

The evaporation pond had 95% coverage of an oil emulsion across the surface of the pond. Pumping of this emulsion was underway at the time of the inspection. The presence of the oil emulsion on the surface of the evaporation pond must be eliminated. It is OCD's understanding that a heated oil/water separator will be used to eliminate the emulsion problem. This problem is a high priority requirement. (Photos #3 & #4)

The storage of used oil absorbent pads and socks during the drying and drainage process is being misused for trash depositing. The collection tank should have only the appropriate material within the collection tank. Drums, cardboard boxes, cans, buckets were observed to be deposited within the drainage tank in violation of disposal requirements. (Photo #6)

6. *Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.*

Plant personnel should be trained to observe for general housekeeping of the facility to prevent unwanted spills and leaks, unwanted trash in sumps and around equipment.

7. *Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the appropriate OCD District Office.*

Plant personnel should be instructed to promptly report any spills and leaks so that proper reporting and remedial action can be initiated.

Once again, OCD would like to thank the plant personnel for their time during our recent visit to your facilities, and for your commitment to operate in an environmentally conscience manner. If you have any questions, please call me at (505) 827-7156.

Sincerely,

W. Jack Ford, C.P.G.
Water Resources Engineering Specialist

xc: OCD Aztec District Office

Z 274 520 519 OCD

US Postal Service Ford 045
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to Ingrid 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 AUG 11 1999	

PS Form 3800, April 1995

Photo #1

GW-045 WILLIAMS FIELD SERVICES KUTZ CANYON GAS PLANT
Leak/spill onto ground surface at processing area in Kutz #1 part of plant.
Remediation by excavating contaminated soils.
July 7, 1999

Photo #2

GW-045 WILLIAMS FIELD SERVICES KUTZ CANYON GAS PLANT
Leak/spill onto ground surface at oil/water separator
July 7, 1999

Photo #3

GW-045 WILLIAMS FIELD SERVICES KUTZ CANYON GAS PLANT
Oil emulsion on surface of evaporation pond
July 7, 1999

Photo #4

GW-045 WILLIAMS FIELD SERVICES KUTZ CANYON GAS PLANT
Oil emulsion on surface of evaporation pond
July 7, 1999

Photo #5

GW-045 WILLIAMS FIELD SERVICES KUTZ CANYON GAS PLANT
Improperly stored drums
July 7, 1999

Photo #6

GW-045 WILLIAMS FIELD SERVICES KUTZ CANYON GAS PLANT
Improper use of absorbent pad & sock drainage tank.
July 7, 1999

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

SEP 21 1998

September 17, 1998

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

Re: Underground Line Testing Results for Williams Field Services Kutz Plant (GW-45)

Dear Mr. Ford:

Enclosed, please find a copy of the results of the underground line testing that was performed at the Williams Field Services (WFS) Kutz Plant (GW-45). If you have any questions concerning this submittal, please call me at 801-584-6543.

Sincerely,

Ingrid Deklau
Environmental Specialist

XC: Denny Foust, NM OCD

Williams – Kutz Plant
6/1/98
M. Smith

OPEN DRAINS TESTING PROCEDURES

Test #1

A) Plug the inlet to the API Separator.
B) Plug the outlet to collection box #2.
C) Plug the outlet to collection box #1.
D) Plug outlet of VLR collection box.
E) Start filling the system with water until water start to come out of drains at tank #3, Start treater, K2 glycol dehydrator and plug these drains as soon as the line is filled. Note: Water will continue to fill the K2 open drain system until it reaches the main header system in the process area.

F) Plug all plant process area drains.
Note: Water will continue to fill the system from the open drain at the highest point elevation (Fuel gas scrubber for K-building) until this system is full.
G) As soon as the system is full a water column (standpipe) will be attached to this drain. (hi point) and filled with water to 35" of water and monitored for 1 hour with no drop in level (Record test data).

Test #2

A) Plug the 12" inlet to collection box #2.
B) Plug all the drains in the R-G building.
C) Plug the drain to control room sink at K2.
D) Start filling water into the open drains at the maintenance shop. (hi point elevation)
Note: As water fills the drain lines monitor the open drains in the maintenance shop.
E) When the system is full, attach a water column (stand pipe) 35" of water to the drain in the maintenance shop. Fill to 35" of water and monitor with no loss in level for 1 hr. (Record test data).

Test #3

A) Plug the 2" inlet of collection box #2.
B) Plug one drain inside K-building.
C) Start filling water into the other drain at K-building.
D) When the drain gets full of water. Hook up the water column (stand pipe) and fill to 35" of water and monitor the level for 1 hour without loss of level. (Record test data).

Test #4

A) Install plug in the 2" inlet to collection box #2 from the EG system.
B) Install plug in the drains at the condensate tank drain.
C) Install a plug at the EG separator/exchanger area drain.
D) Fill water into the drain at the EG System (dehydrator O.H. separator drain until system is full.
E) Connect water column (standpipe) fill to 35" of water column and monitor level for 1 hour with no loss of level.

Test #5

A) Plug the 6" inlet to collection box #1.
B) Plug the outlet or over fill line at the cooling tower.
C) Plug all drains in the lean oil pump house.
D) Plug drains at the Iron Sponge units.
E) Start filling the system.
F) As the lines start to fill up and you get water coming out the K1 plant area drains.
G) Plug all open drains at the north Clark building.
H) The high point elevation and filling point will be at K1 inlet meter run area. Plug all drains including Marley Cooling Tower drain and inlet separator. Continue to fill until high point drain is full.
I) Attach water column (standpipe) and fill to 35" of water column. Monitor level without the loss of level for 1 hour. Record test data.

Test #6

A) Install plug in the outlet drain line from the fire pump house to the R& G drain.
B) Fill fire pump drain with water.
C) Install water column (standpipe) to this drain to 35" of water column for 1 hour without loss of level. Record test data.

Test #7

A) Plug the inlet into the pond.
B) Plug the 12" outlet from the API separator.
C) Plug the outlet from the wastewater storage tank.
D) Start filling the system from the cooling tower bleed line at K1 lean oil pump house.
E) Open the drain at the utility water sand filter until water comes out and then plug this line.
F) When the drain at the Cooling Tower bleed meter to the pond gets full, attach the water column (standpipe). Fill to 35" of water column and monitor for 1 hour without loss of level. Record test data.

Williams – Kutz Plant
6/1/98
M. Smith

Alternate Test Procedure for Test #1

Note: During Test #1, as we were filling the system we discovered that the rubber boot connecting the pipes together started to leak when we got the system almost full. The plug began to leak also due to the elevation from the high point test area to the inlet of the API (approx. 60' drop in elevation). We discontinued filling and drain the water from the system and install a dress coupling on the inlet to the API and one (1) on the 4" coming from K2 plant. The following will be the alternate test procedures: Test #1A, main 12" header, Test #1B Kutz 2 plant area, Test #1C, K-building.

Test #1A

A) Install a plug into the inlet of the API separator.
B) Install a plug into the outlet of the #2 collection box.
C) Install a plug into the outlet of the #1 collection box.
D) Install a plug into the outlet of the VLR collection box.
E) Install a plug into the outlet of the K2 4" drain at the dresser coupling.
F) Install a plug into the drain tank #3 and a plug at the salt treater drain.
G) Start filling the system with water at the #2 collection box. (Plug is drilled and topped with a valve for testing).
H) As soon as system is full. Hook up test equipment (standpipe) water column at the high point in elevation. Fill water column to 35" of water and monitor for 1 hour without any drop in level (record test data).

Test #1B

A) Install plug into the outlet 4" dresser-coupling outlet from K2.
B) Install plugs into all K2 process area drains, including the K2 glycol dehydrator drain.
C) Install a pneumatic plug into 4" drain from K-building.
D) Start filling system with water at the high point in elevation (K2 treated gas separator drain).
E) As soon as the system is full of water, install the test equipment (water column) stand pipe and fill to 35" of water and test for 1 hour without any drop of water level. (Record test data).

Test #1C

A) Install pneumatic plug into line coming from K-building to K2 plant area (plug install through clean out into line).
B) Install plug into drain line out of Marley Cooling Tower.
C) Install plug into the drain at the K2 refrigerant surge tank.
D) Start filling system into the drain at the K-building fuel gas scrubber drain.
E) As soon as the system is full of water, install test equipment (water column) and fill to 35" of water column and test for 1 hour without any drop in water level. Record test data.

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 1a **DATE**: MAY 21, 1998

TIME TEST STARTED: 3:45 p.m. **TIME ENDED**:

PERSON PERFORMING TEST: MIKE SMITH

WITNESS OF TEST: RANDY BIBLE, CF&M

SIGNATURE OF WINESS:

RESULTS OF TEST:
Replaced 12" & 6" lines with new sch. 40 pvc 8" & 6" pipe.
Installed plugs and filled with water.

Tested with 35" of water column with no loss of water level.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 1b **DATE**: APRIL 6, 1998

TIME TEST STARTED: 1O:00 a.m. **TIME ENDED**: 11:45 a.m.

PERSON PERFORMING TEST: MIKE SMITH

WITNESS OF TEST: RANDY BIBLE, CF&M

SIGNATURE OF WINESS:

RESULTS OF TEST:
Test was good, filled water column (stand pipe) to 35" of water and halt for 1 hour & 45 min.
Left water in drains all day and monitored system (levels never dropped). Started testing of test 1c.

Also started testing of Test #5 Kutz 1 Plant.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 1c **DATE**: APRIL 9, 1998

TIME TEST STARTED: 2:30 p.m. **TIME ENDED**: 4:00 p.m.

PERSON PERFORMING TEST: MIKE SMITH

WITNESS OF TEST: RANDY BIBLE, CF&M

SIGNATURE OF WINESS:

RESULTS OF TEST:
Test was good (35" of water column) for 1.5 hrs with no loss of level.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 2 **DATE**: MAY 8, 1998

TIME TEST STARTED: 1:00 p.m. **TIME ENDED**: 2:15 p.m.

PERSON PERFORMING TEST: MIKE SMITH

WITNESS OF TEST: THOMAS H. MARTINEZ, CF&M

SIGNATURE OF WINESS:

RESULTS OF TEST:
Tested with 35" of water column. With no drop in water level.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 3 **DATE**: APRIL 8, 1998

TIME TEST STARTED: x **TIME ENDED**: x

PERSON PERFORMING TEST: x

WITNESS OF TEST: x

SIGNATURE OF WINESS: JM Smith

RESULTS OF TEST:
(Test #3) The piping was not connected as per drawings and this piping was tested with alternate test #1c.

See test results for Test #1c.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 4 **DATE**: MAY 11, 1998

TIME TEST STARTED: 9:00 a.m. **TIME ENDED**: 10:00 a.m.

PERSON PERFORMING TEST: MIKE SMITH

WITNESS OF TEST: THOMAS H. MARTINEZ, CF&M

SIGNATURE OF WINESS:

RESULTS OF TEST:
Tested with 35" of water column. With no drop in water level.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 5 **DATE**: APRIL 17, 1998

TIME TEST STARTED: 4:00 p.m. **TIME ENDED**: 5:00 p.m.

PERSON PERFORMING TEST: MIKE SMITH

WITNESS OF TEST: RANDY BIBLE, CF&M

SIGNATURE OF WINESS:

RESULTS OF TEST:
We tested the system with 35" of water column with no loss of water.

We disconnected the lean oil pump house from this test and will replace piping and test this part at a later date.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 5 **DATE**: MAY 27, 1998

TIME TEST STARTED: 2:00 p.m. **TIME ENDED**: 3:00 p.m.

PERSON PERFORMING TEST: MIKE SMITH

WITNESS OF TEST: RANDY BIBLE, CF&M

SIGNATURE OF WINESS:

RESULTS OF TEST:
We tested the lean oil pump house. Drained after replacing with new 4" pvc pipe sch. 40.

Tested system with 35" of water column with no loss of water level.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 6 **DATE**: MAY 6, 1998

TIME TEST STARTED: 10:40 a.m. **TIME ENDED**: 2:40 p.m.

PERSON PERFORMING TEST: MIKE SMITH

WITNESS OF TEST: THOMAS H. MARTINEZ, CF&M

SIGNATURE OF WINESS: 

RESULTS OF TEST:
Tested with 67" of water column with no drop in level for 4 hrs.

Test passed.

s:\forms\opendrain.xls

WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 7 **DATE**: APRIL 1, 1998

TIME TEST STARTED: x **TIME ENDED**: x

PERSON PERFORMING TEST: x

WITNESS OF TEST: x

SIGNATURE OF WINESS: J M Smith

RESULTS OF TEST:
Cannot be tested due to the water level is over the outlet into the pond.
Will test as soon as levels permit.

s:\forms\opendrain.xls

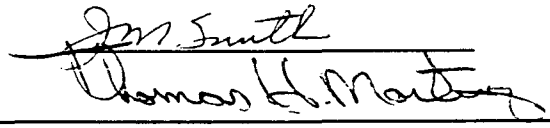
WILLIAMS - KUTZ PLANT
OPEN DRAIN SYSTEM TEST REPORT

TEST#: 7 **DATE**: JULY 23, 1998

TIME TEST STARTED: 12:15 p.m. **TIME ENDED**: 1:30 p.m.

PERSON PERFORMING TEST: M. SMITH & T. MARTINEZ

WITNESS OF TEST: MIKE SMITH

SIGNATURE OF WINESS: 

RESULTS OF TEST:
Tested with 75" of water column without any drop in level for 1 hr. & 15 min.

This test was postponed due to nigh level in pond covering the outlet nozzle into the pond.

s:\forms\opendrain.xls

Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT 80587 03/02/98

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
GW-045		02/06/98	50.00	0.00	50.00
			50.00	0.00	50.00

GW-045

PLEASE DETACH BEFORE DEPOSITING

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. 80587 dated 3/2/98,

or cash received on _____ in the amount of $ 50.00

from WFS

for Kutz GP (Facility Name) GW-045 (GIP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: R Chavez Date: _____

Received in ASD by: _____ Date: _____

Filing Fee XX New Facility ___ Renewal ___

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 98

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

Chase Manhattan Bank Delaware
1201 Market Street
Wilmington DE 19801

62-26
311

5736-09

DATE	CHECK NO.	NET AMOUNT
03/02/98	80587	50.00

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

TO THE ORDER OF
NMED-WATER QUALITY MANAGEMENT
2040 SO. PACHECO
SANTA FE NM 87505

Mary Jane Bittick
TREASURER

⑈0080587⑈ ⑆031100267⑆630145736 509⑈

Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT 88034 06/08/98

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
GW-045-R	GW-045 RENEWAL	05/15/98	1667.50	0.00	1667.50
			1667.50	0.00	1667.50

GW-045

PLEASE DETACH BEFORE DEPOSITING

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. 88034 dated 6/8/98.

or cash received on _____ in the amount of $ 1667.50

from WFS

for Kutz GP GW040
(Facility Name) (GW No.)

Submitted by: _____ Date: _____

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal ___

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

Williams

Williams Field Services Company
P. O. Box 58900
Salt Lake City, Utah 84158-0900

Chase Manhattan Bank Delaware
1201 Market Street
Wilmington DE 19801

62-26
311

5736-09

DATE	CHECK NO.	NET AMOUNT
06/08/98	88034	1667.50

PAY
ONE THOUSAND SIX HUNDRED SIXTY-SEVEN AND 50/100----------

TO THE ORDER OF
NMED-WATER QUALITY MANAGEMENT
2040 SO. PACHECO
SANTA FE NM 87505

Mary Jane Battick
TREASURER

⑈0088034⑈ ⑆031100267⑆630145736 6 509⑈

Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT 88034 06/08/98

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
GW-045-R	GW-045 RENEWAL	05/15/98	1667.50	0.00	1667.50
			1667.50	0.00	1667.50

GW-045
JT

PLEASE DETACH BEFORE DEPOSITING

Williams Field Services Company
P. O. Box 58900
Salt Lake City, Utah 84158-0900

Chase Manhattan Bank Delaware
1201 Market Street
Wilmington DE 19801

62-26
311

5736-

DATE	CHECK NO.	NET AMOUNT
06/08/98	88034	1667.50

PAY
ONE THOUSAND SIX HUNDRED SIXTY-SEVEN AND 50/100----------

TO THE ORDER OF
NMED-WATER QUALITY MANAGEMENT
2040 SO. PACHECO
SANTA FE NM 87505

Mary Jane Battick
TREASURER

⑈0088034⑈ ⑆311100267⑆630145736 6509⑈

Flat Fee for
renewal
Paid in full
JT

The Santa Fe New Mexican
Since 1849. We Read You.

NM OCD

APR - 9 1998

OIL CONSERVATION DIVISION

AD NUMBER: 18766 ACCOUNT: 56689

LEGAL NO: 63283 P.O. #: 98-199-000257

228 LINES ONCE at $ 91.20

Affidavits: 5.25

Tax: 6.03

Total: $102.48

NOTICE OF PUBLICATION

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

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

(GW-045) - Williams Field Services, Ingrid A. Deklau, (801) 584-6543, P.O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan renewal application for the Williams Field Services Kutz Canyon Gas Plant facility located in the SW/4 of Section 12, NE/4 of Section 13, SE/4 of Section 14, Township 28 North, Range 13 West, NMPM, San Juan County, New Mexico. Approximately 4,200 gallons of process waste water is disposed of in an OCD approved double lined evaporation pond with leak detection. The total dissolved solids (TDS) of the waste water is approximately 1,500 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is shallow perched water with TDS concentrations ranging from 8,000 to 18,000 mg/l. Deeper ground water is at a depth of 200 feet with estimated total dissolved solids concentration ranging from 2,000 to 4,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-134) - Williams Field Services, Ingrid A. Deklau, (801) 584-6543, P.O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan renewal application for the Williams Field Services Decker Junction C.D.P. compressor station facility located in the SE/4 of Section 19, Township 30 North, Range 18 West, NMPM, San Juan County, New Mexico. Approximately 1,500 gallons per day of process and waste water is collected in steel storage tanks then transported offsite for disposal. Ground water most likely to be effected in the event of an accidental discharge is at an estimated depth of 30 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.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of March 1998.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
LORI WROTENBERY, Director

Legal #63283
Pub. April 6, 1998

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 63283 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 6 day of APRIL 1998 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 6 day of APRIL A.D., 1998

Notary B. Mathie
Commission Expires 3-13-2001

OFFICIAL SEAL
B. MATHIE
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires 3-13-2001

• P.O. Box 2048 • Santa Fe, New Mexico 87501
505-983-3303

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

March 31, 1998

Farmington Daily Times
Attention: Advertising Manager
Post Office Box 450
Farmington, New Mexico 87401

Re: Notice of Publication

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. ***Publisher's affidavit in duplicate.***
2. ***Statement of cost (also in duplicate).***
3. ***Certified invoices for prompt payment.***

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than April 7, 1998.

Sincerely,

Sally Martinez
Administrative Secretary

Attachment

P 269 262 728

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

Sent to	Farmington Daily Times
Street & Number	P.O. Box 450
Post Office, State, & ZIP Code	Farmington, NM 87401
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

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

March 31, 1998

The New Mexican
***Attention:** Betsy Perner*
202 East Marcy
Santa Fe, New Mexico 87501

Re: Notice of Publication
PO # 98-199-00257

Dear Ms. Perner:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. ***Publisher's affidavit.***
2. ***Invoices for prompt payment.***

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than Monday, April 6, 1998.

Sincerely,

Sally Martinez
Administrative Secretary

Attachment

NOTICE OF PUBLICATION

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

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

(GW-045) - Williams Field Services, Ingrid A. Deklau, (801) 584-6543, P. O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan renewal application for the Williams Field Services Kutz Canyon Gas Plant facility located in the SW/4 of Section 12, NE/4 of Section 13, SE/4 of Section 14, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 4,200 gallons of process waste water is disposed of in an OCD approved double lined evaporation pond with leak detection. The total disolved solids (TDS) of the waste water is approximately 1,500 milligrams per liter (mg/l). Ground water most likely to be affected in the event of an accidental discharge at the surface is shallow perched water with TDS concentrations ranging from 8,000 to 18,000 mg/l. Deeper ground water is at a depth of 200 feet with estimated total dissolved solids concentration ranging from 2,000 to 4,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-134) - Williams Field Services, Ingrid A. Deklau, (801) 584-6543, P. O. Box 58900, Salt Lake City, Utah 84158-0900, has submitted a discharge plan renewal application for the Williams Field Services Decker Junction C.D.P. compressor station facility located in the SE/4 of Section 19, Township 32 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 1,500 gallons per day of process and waste water is collected in steel storage tanks then transported offsite for disposal. Ground water most likely to be affected in the event of an accidental discharge is at an estimated depth of 30 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.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of March 1998.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

NOTICE OF PUBLICATION

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of March 1998.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

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

March 25, 1998

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

Re: Discharge Plan Renewal, Williams Field Services Kutz Canyon Gas Plant (GW-045)

Dear Mr. Ford:

Enclosed you will find a copy of the continuation to Table 2 of the Kutz Canyon Gas Plant Discharge Plan renewal that I just mailed to you yesterday. (I accidentally left it out since it is saved under another file name). Please insert this table into my March 24, 1998 submittal. I apologize for the inconvenience.

Please call me at (801)-584-6543 if there are any questions.

Sincerely,

Ingrid Deklau
Environmental Specialist

Enclosure

Xc: Denny Foust, NMOCD Aztec District

TABLE 2 (continued)
TRANSFER, STORAGE, AND DISPOSAL OF EFFLUENTS AND WASTE SOLIDS
KUTZ CANYON GAS PLANT

Tank No.	Product Stored	Tank Capacity (gal. estimate)	Secondary Containment	Notes/Location
2 3	Lean oil storage Natural gasoline	19,900 19,900	Share berm	Northeast portion of facility
30 31	Flare separator liquids Oil/water separator liquids	10,000 2,500	Share berm	East of flare
32	API Water	10,000	Berm	East of flare
40	Waste oil	2,000	Berm	West of fire pump house
41 42	Waste solvent Solvent storage	180 180	Share berm	Southeast corner of Maintenance Shop
43	Unleaded gasoline	320	Berm	East of tanks 41 and 42
50	K-1 fire pump diesel	1,000	Berm	South of Fire Pump Building
51	K-1 generator oil	3,000	Berm	North of Generator A&B Building
52	K-1 ethylene glycol drip	500	Berm	West of Tank 53
53	K-1 ethylene glycol storage K-1 ethylene glycol surge tank	8000 1800	Berm	South of still reboiler, Kutz 1
54	K-1 R&G ambitrol storage	3,300	Berm	Northeast corner of R&G Building
55	K-1 R&G engine oil	5,870	Berm	East side of R&G Building
56	K-1 North R ambitrol storage	2,750	Berm	Southwest corner of R Building
57	K-1 North R engine oil	3,000	Berm	North of R Building
58	K-1 Lean oil storage	10,330	Berm	East of Tanks 2&3
59	K-1 methanol	4,510	Berm	East of tank farm
60	Y Station diesel	180	Berm	E of Emergency Generator Building
61	K-2 diethylene glycol	705	Berm	West end of Kutz 2
62 63	Amine mix Amine	8,000 8,000	Berm	West of Kutz 2 Control Room
64	K-2 K-Bldg engine oil	2,920	Berm	Southeast corner of K Building
65	K-2 Y-Bldg engine oil	2,930	Berm	Southeast corner of Y Building
none	R&G Ambitrol transfer tank	1000	Berm	Southwest corner of R&G Building
none	North R Ambitrol transfer tank	1000	Berm	Southeast corner of R Building
none	Filter/absorbent draining tank	1000	none	West of Fire Pump Building. Accumulated oil pumped and transported to waste oil tank
none	Diesel	200	inside building	Inside Fire Pump Building
none	Various products (I.e., corrosion inhibitor, antifoam, oil, etc.)	5-200	inside buildings	Various locations
70	Diesel	20,000	none	To be removed from service
71	Propane	20,000	N/A	Gas at atmospheric pressure
72 73 74 75	Methanol Diethylene glycol Unlabeled Diesel	8,800 8,800 8,800 500	Share berm	Tanks 70-75 are located in the warehouse yard.

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

March 24, 1998

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

Re: OCD Discharge Plan Renewal: Kutz Canyon Gas Plant (GW-045)

Dear Mr. Ford:

Enclosed, please find Check Number 80587 for $50 to cover the application fee for the Discharge Plan Renewal of Williams Field Services (WFS) Kutz Canyon Gas Plant (GW-045). The information attached serves to summarize and update the original discharge plan that was submitted to the OCD on December 21, 1987. For your information, the complete list of documents which constitute the Kutz Canyon Gas Plant Discharge Plan are listed below.

March 25, 1998	WFS application for renewal
February 6, 1998	OCD request for renewal
August 19, 1996	OCD approval of modification
August 1996	WFS application for modification
July 30, 1993	Sunterra transmittal of fees
July 27, 1993	Sunterra application for exception
June 28, 1993	OCD approval of renewal
April 14, 1993	PNM application for renewal
January 27, 1993	OCD request for renewal
November 19, 1990	OCD approval of modification
November 8, 1990	Sunterra application for modification
April 18, 1988	OCD approval of application
April 7, 1988	Sunterra response to OCD
January 22, 1988	OCD request for additional information
December 21, 1987	Sunterra Application

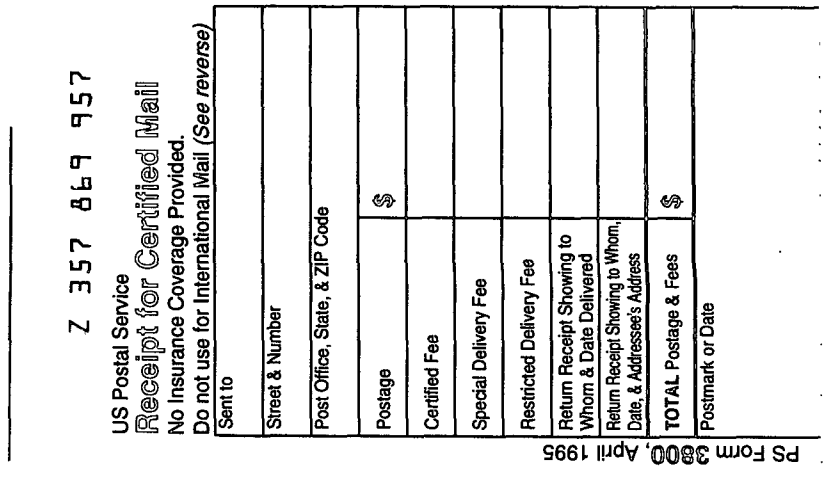
If you have any questions, I can be reached at (801) 584-6543. Your assistance in handling these matters is appreciated.

Sincerely,

Ingrid A. Deklau
Senior Environmental Specialist

enclosures

xc: Denny Foust, Aztec OCD Office



P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

NEW MEXICO
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Revised 12/1

Submit Orig
Plus 1 Co
to Santa
1 Copy to appropr
District Of

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Natural Gas Plant
2. Operator: Williams Field Services - Kutz Plant
   Address: 295 Chipeta Way Salt Lake City UT 84108
   Contact Person: Ingrid Deklau Phone: 801-584-6543
3. Location: SW /4 Section 12 ~~SE~~ Section NW/4 Section 13 Township 28 N Range 11 W
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION

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

NAME: Ingrid Deklau Title: Environmental Specialist

Signature: Ingrid Deklau Date: 3/24/98

I. NAME OF FACILITY AND TYPE OF OPERATION

The Kutz Gas Processing Plant (GW-045) removes ethane and higher hydrocarbons from field natural gas. The hydrocarbons that are removed are marketed in several places. The residual natural gas is also marketed by another company. The Plant was purchased by Williams in 1995. The plant was owned by Sunterra between 1986 and 1995. Prior to that time, the Plant was owned by Southern Union Company.

II. LEGALLY RESPONSIBLE PARTY

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

Contact Person:
Ingrid A. Deklau, Sr. Environmental Specialist
Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Kutz Gas Processing Plant (GW-045) is located in the SW/4 of Section 12, NW/4 of Section 13, Township 28 North, Range 11 West, in San Juan County, New Mexico, approximately 2 miles south of Bloomfield, New Mexico. The Plant site covers approximately 22 acres.

IV. LANDOWNER

Bureau of Land Management
1235 Laplata Highway
Farmington, NM 87401
505-599-8900

V. FACILITY DESCRIPTION

The Plant was originally constructed in 1949. The Plant consists of two different extraction systems to remove ethane and higher hydrocarbons from field natural gas. The Kutz #1 Processing Unit was built in 1949 with a designed unit capacity for 120 million cubic feet of gas per day using a refrigerated oil absorption process. An upgrade and a new extraction system, the Kutz #2 Processing Unit, was added in 1976. The Kutz #2 unit was designed for a cryogenic process and has a capacity of approximately 80 mmcf/d. Both units are currently active. The hydrocarbons that are removed are marketed in several places. The residual natural gas is also marketed by another company.

A more detailed description of the processes can be found in the December 21, 1987 OCD Discharge Plan submitted by Sunterra. Planned process changes described in the December 21, 1987 application that have been implemented include the following:

- All wastewater from the floor drains is sent to a collector box and then routed through an oil water separator to remove any oil. The water from the separator is directed to the evaporation pond, and the oil is hauled by a used oil recycler.

- The Kutz #2 sink drain is connected into the collector.

- The double-lined evaporation pond with leak detection has been installed.

Additionally, the plant recently eliminated the use ofDiethanolamine at the facility. The plant now uses a Methyldiethanolamine-based product.

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

TABLE 1
SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS
KUTZ CANYON GAS PLANT

PROCESS FLUID/WASTE	SOURCE	QUANTITY	QUALITY
Used Oil	Compressors, engines, oil water separator	500 gal/mo	Used motor oil with no additives
Filter Separator Liquids	Filter Separator	3000 gal/mo	Water and hydrocarbon mixture with no additives
Flare Separator Liquids	Flare Separator	300 gal/mo	Liquid hydrocarbons with traces of glycol and amine with no additives
Used Solvent (stoddard type)	Parts Washer	300 gal/yr	No additives, petroleum-based solvent
Used process filters (i.e., glycol, amine, lean oil, etc.)	Dehydrators, CO2 removal, hydrocarbon removal	630/yr	No additives
Oil Filters	Compressors and engines	550/yr	No additives
Used Iron Sponge	H2S treatment	600 bushels/yr	No additives
Used Carbon	From amine system	4500 lb/yr	No additives
Used Mole Sieve	Used in removal of water from natural gas stream	23,000 lb/yr	No additives
Spill Residue	Incidental spills, leaks, or cleanup	Incident dependent	Incident dependent
Used Absorbents	Incidental spills, equipment clean-up	Incident dependent	Incident dependent
Liquid Effluent from Processing Plant (wastewater)	Cooling tower, filter separator, open drain system/ washdown water, produced water, Kutz 2 control room sink, iron sponge process water, oil water separator	1.3 million gal/yr	High TDS water, dissolved salts, traces of glycol/oil

VII. TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND WASTE SOLIDS

TABLE 2
TRANSFER, STORAGE, AND DISPOSAL OF EFFLUENTS, AND WASTE SOLIDS
KUTZ CANYON GAS PLANT

PROCESS FLUID/WASTE	SOURCE	STORAGE	CONTAINER CAPACITY** (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Compressors, engines, oil water separator	AST* (tank 40)	2000 gal	Concrete berm	Non-exempt	Transported to EPA-registered used oil marketer for recycling.
Filter Separator Liquids	Filter Separator	AST* (tank 3)	2,200 gal	Berm	Exempt	Saleable product.
Flare Separator Liquids	Flare Separator	AST* (tank 30)	2,200 gal	Berm	Exempt	Saleable condensate will be transported by purchaser to their refinery.
Used Solvent	Parts Washer	AST* (tank 41)	170 gal	Berm	Non-exempt	Mixed with waste oil and hauled by used oil recycler.
Used process filters (i.e., glycol, amine, lean oil, etc.)	Dehydrators, CO2 removal, hydrocarbon removal	Roll off bin for special waste	Dumpster	N/A	Exempt	Drained and transported to approved disposal facility.
Oil Filters	Compressors, engines	Roll off bin for special waste	Dumpster	N/A	Non-exempt	Drained and transported to approved disposal facility.
Process Treatment Waste (i.e., carbon, mole sieve, etc.)	Gas treatment	N/A	N/A	N/A	Exempt	Dried on-site prior to disposal at approved disposal facility.
Spill Residue (i.e., soil, gravel) or other exempt waste	Incidental spills, leaks, or cleanup	N/A	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	Roll off bin for special waste	Dumpster	N/A	Non-exempt	Drained and transported to approved disposal facility.
Liquid Effluent from processing plant (wastewater)	Cooling tower, filter separator, open drain system/ washdown water, produced water, Kutz 2 control room sink, iron sponge process water, oil water separator	Evap pond	N/A	Double-lined pond with leak detection	Non-exempt	Liquids pass through oil water separator, then directed to evaporation pond
Scrap metal	Facility-wide, incident dependent	Boneyard	N/A	N/A	N/A	Hauled by recycler, reused on site, or disposed at local landfill

*AST = Above Ground Storage Tank

VIII. INSPECTION, MAINTENANCE AND REPORTING

WFS's Kutz Plant personnel operate the and maintain the facility and its associated processes. The facility is manned 24 hours per day, 7 days per week, 52 weeks per year and is continuously monitored for equipment malfunctions.

Maintenance on process equipment is performed according to manufacturer's instruction. The below-ground concrete collector boxes are equipped with leak detection and are monitored monthly. Routine inspections and tank guaging are also conducted periodically. All inspections are recorded on the facilities operating record.

In the event of a release of a reportable quantity, the operator reports the release to WFS Gas Control who immediately notifies the WFS Environmental Affairs Department.

IX. SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Within the processing units, small spills or leaks will be controlled with the use of curbs or berms around pieces of equipment that are the most susceptible, such as pumps, tanks and separators. Major spills would drain across the Plant and be contained in the stormwater retention pond.

WFS corporate policy and procedures for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix B. WFS Environmental Affairs will report significant spills and leaks to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix C).

Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT 80587 03/02/98

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
GW-045		02/06/98	50.00	0.00	50.00
			50.00	0.00	50.00

RECEIVED
MAR 27 1998
Environmental Bureau
Oil Conservation Division

PLEASE DETACH BEFORE DEPOSITING

WILLIAMS FIELD SERVICES COMPANY
ONE OF THE WILLIAMS COMPANIES

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

Chase Manhattan Bank Delaware
1201 Market Street
Wilmington DE 19801

62-26
311

5736-(

DATE	CHECK NO.	NET AMOUNT
03/02/98	80587	50.00

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

TO THE ORDER OF
NMED-WATER QUALITY MANAGEMENT
2040 SO. PACHECO
SANTA FE NM 87505

Mary Jane Bittick
TREASURER

⑈0080587⑈ ⑆031100267⑆630145736 6 509⑈

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 6, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-869-923

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

RE: Discharge Plan GW-045 Renewal
Kutz Canyon Gas Plant
San Juan County, New Mexico

Dear Ms. Deklau:

On April 15, 1993, the groundwater discharge plan, GW-045, for the Williams Field Services Kutz Canyon Gas Plant located in the SW/4 of Section 12, NE/4 of Section 13, and SE/4 of Section 14, Township 28 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 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 April 15, 1998.**

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 (on or before December 15, 1997), 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. **To date the OCD has not received an application for renewal of GW-045.** 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 **Kutz Canyon Gas Plant** 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 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 Kutz Canyon Gas Plant 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 357 869 923

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

Sent to Ingrid Deklau	
Street & Number WFS	
Post Office, State, & ZIP Code Salt Lake City	
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 GW-045	

PS Form 3800, April 1995

WILLIAMS ENERGY GROUP

FIELD SERVICES

January 2, 1998

Mr. Mark Ashley
NMOCD
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Change operator at Kutz and Lybrook Plants (GW045 and GW047) to WFS

Dear Mr. Ashley,

In a conversation we had several months ago, you mentioned that the Kutz Plant and the Lybrook Plant were listed in your records under Williams Gas Processing-Blanco as the operator. You were correct in assuming that the operator at these sites should be changed to properly reflect Williams Field Services (WFS) as the operator. Williams assets in the Four Corners area may be owned by any one of several Williams Companies; however, the operator in all cases is WFS. Please change your records accordingly.

If you have any questions, I can be reached at (801) 584-6543.

Best Regards,

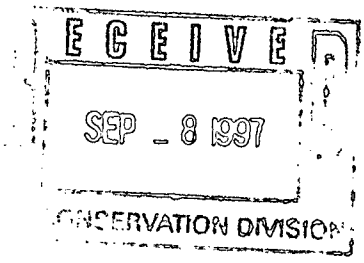
Ingrid Deklau
Environmental Specialist

295 Chipeta Way ● P.O. Box 58900 ● Salt Lake City, Utah 84108
(801) 583-8800

WILLIAMS ENERGY GROUP

FIELD SERVICES

September 5, 1997



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

Dear Mr. Anderson,

In April 1997, a subsurface investigation was performed at the Williams Field Services' (WFS) Kutz Plant in Bloomfield, New Mexico in response to a spill of 200 gallons of lean oil from the lean oil tank. Results of that investigation were forwarded in a report dated May 1997 and titled, 'Results of Assessment at WFS Kutz Plant Lean Oil Tank', to Mr. Sanchez at the NMOCD, and also to Mr. Foust at the Aztec OCD.

The report indicated that WFS planned to limit further migration of any remaining contamination by installing an impermeable cap over the affected area. On June 17, 1997, WFS received a letter of approval on the aforementioned 'Assessment Results' report from Mr. Sanchez, under the condition that Mr. Foust be notified 72 hours in advance of the installation of the impermeable cap.

On September 4, 1997, Mr. Foust received a copy of the enclosed plan for construction of a concrete pad which will be installed to comply with the Condition of Approval included in the June 17, 1997 letter. Mr. Foust gave his verbal approval of the plan to Mr. David Sanders, Kutz Plant superintendent, and requested that we forward a copy to you.

If you have any questions pertaining to this matter, please don't hesitate to contact me at (801) 584-6543 or Mr. David Sanders at (505) 632-4456.

Sincerely,

Verbal Approval
9/17/97
RA

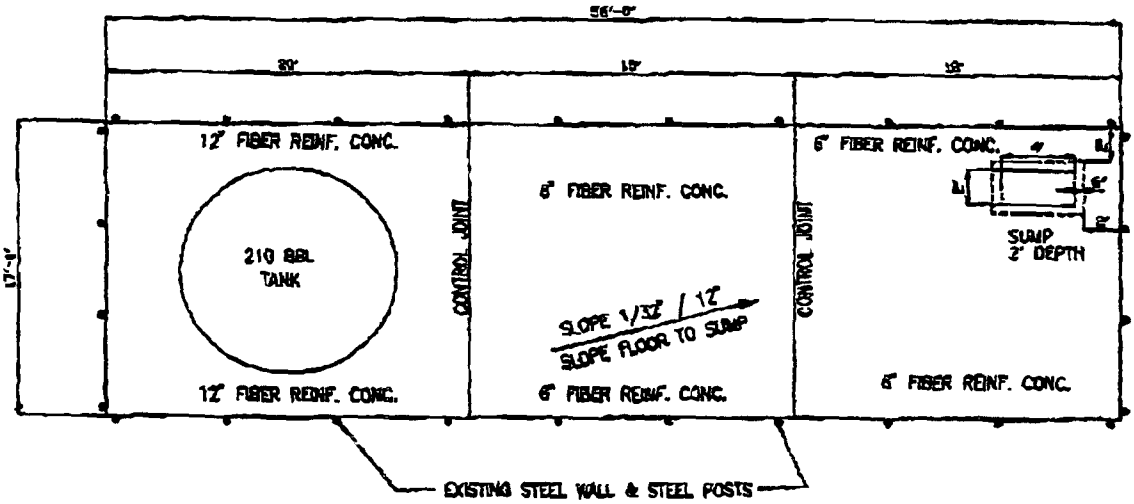
Ingrid Deklau
Environmental Specialist

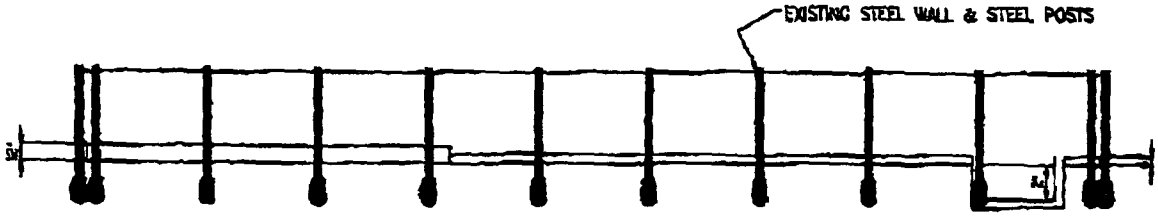
xc: Denny Foust, Aztec OCD
David Sanders, Kutz Plant superintendent

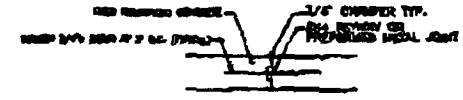
enclosure

GW-045

295 Chipeta Way ● P.O. Box 58900 ● Salt Lake City, Utah 84108
(801) 583-8800







CONTROL JOINT

GENERAL NOTES

1. ALL CONCRETE SHALL HAVE A MINIMUM STRENGHT OF 4000 PSI @ 28 DAYS
3. REINFORCEMENT SHALL BE 10x10—No. 6 WIRE.
5. CONTROL JOINTS SHALL NOT EXCEED A MAXIMUM SPACING 20' x 20'
4. SUBGRADE SHALL BE COMPACTED TO 95% MODIFIED PROCTOR AND TEST REPORTS SHALL BE FURNISHED TO THE ENGINNER.
5. INSTALL SILCON CAULKING AT JOINT WHERE PLATE STEEL MEETS CONCRETE. INSTALL SILCON CAULKING IN CHAMFER ON CONTROL JOINT.
6. THE 210 BBL TANK AT FULL CAPACITY WEIGHTS APPROXIMATELY 82,820 LBS. THIS PLACES 3.25 LBS/SQ.IN. OR 468 LBS./SQ.FT ON THE CONCRETE SURF

PAUL FRANCIS MARTIN NEW MEXICO 8548 REGISTERED PROFESSIONAL ENGINEER

DATE 9-1-97 DRAWN EK
SCALE NOT TO SCALE CHECKED PM
APPROVED

SAKURA

FOUNDATION PLAN CFM

SHEET 1
SHEETS 1

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

June 17, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-608

Mr. Mark Harvey
Project Coordinator
Williams Field Services (WFS)
P.O. Box 58900
Salt Lake City, Utah 84158-0900

RE: Assessment Results From The Lean Oil Tank At Kutz Plant - Approval
Williams Gas Processing-Blanco
GW-045, Kutz Plant
San Juan County, New Mexico

Dear Mr. Harvey:

The OCD has received the letter and information "Assessment Results From The Lean Oil Tank At Kutz Plant" dated May 5, 1997. **The above mentioned "Assessment Results From The Lean Oil Tank At Kutz Plant" is hereby approved subject to the following condition:**

- Mr. Denny Foust with the Aztec OCD District Office be notified 72 hours in advance of the installation of the impermeable cap. (Telephone (505)-334-6178)

Be, advised that OCD approval of this work plan does not relieve WFS from liability associated with this assessment should it be found at a later date that the procedures taken failed to have adequately protected groundwater. Further, OCD approval does not relieve WFS from responsibility to comply with other federal, state, and local, rules/regulations that may apply.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau - OCD

c: Mr. Denny Foust - Environmental Geologist, Aztec OCD District Office.

P 326 936 608

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

Sent to WFS - Kutz GW-045	
Street & Number Leaking Tank Assessment.	
Post Office, State, & ZIP Code	
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

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

June 9, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-410-431-401

Mr. Mark Harvey
Project Coordinator
Williams Field Services (WFS)
P.O. Box 58900
Salt Lake City, Utah 84158-0900.

RE: LANDFARM APPLICATION - NOI
Williams Gas Processing-Blanco
GW-045, Kutz Plant
San Juan County, New Mexico

PS Form 3800, April 1995

P 410 431 401

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

Sent to Kutz - GW-045 - Mr. Harvey
Street & Number Lead Farm Mgt. for Kutz plant
Post Office, State, & ZIP Code

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	

Dear Mr. Harvey:

The OCD has received the letter and request "DISCHARGE PLAN REVISION AT KUTZ PLANT GW-45" dated May 5, 1997. The request is considered to be a "Modification" to the GW-45 discharge plan and will require that public notice be issued pursuant to 20 NMAC 6.2. 3108 and that a filing fee and flat fee be charged pursuant to 20 NMAC 6.2 3114. A review of that application as submitted by WFS on may 5, 1997 is deficient in many areas, and therefore the OCD is sending WFS an application form, discharge plan guidelines, and landfarm guidelines, so a complete "Modification" can be completed by WFS and submitted to the OCD so that a public notice can issued and review of this proposal may continue. Please include the application form and $50 filing fee along with the completed "Modification" application. Submit the original application and filing fee to the Santa Fe OCD office and one copy to the Aztec District OCD Office.

The land farm guidelines are being included so WFS may propose to operate and monitor the landfarm in accordance with OCD approved treatment zone and waste application procedures.

If WFS has any questions regarding this NOD please feel free to call me at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau - OCD

Enclosures - Application form, Discharge Plan Guidelines, and Guidelines for Landfarms.

c: Mr. Denny Foust - Environmental Geologist, Aztec OCD District Office.

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 19, 1997

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

RE: OCD LETTER OF MAY 9, 1997 REGARDING SAMPLE KTZ-LO-V-501

Pursuant to your request, be advised that the sample referenced was collected on March 26, 1997 from the lean oil tank area at the Kutz Plant; the same date which samples from the landfarm were collected. The sample from the lean oil tank was given a "LO" alpha designation as part of the sample identification (see Chain-of-Custody). The results from the analysis of the lean oil sample were communicated previously to Mr. Denny Faust and you and were the basis for the Oil Conservation Division (OCD) request to perform additional assessment work around the lean oil tank at Kutz.

For the record, the additional assessment work has been completed at the lean oil tank at Kutz and a copy of the report has been provided to OCD.

If any additional information is required or if further clarification is necessary, please call me at 801-584-6361.

Respectfully,

Mark Harvey
Environmental Services

295 Chipeta Way, Salt Lake City, UT 84158

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 5, 1997

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

RE: ASSESSMENT RESULTS FROM THE LEAN OIL TANK AT KUTZ PLANT

Dear Mr. Sanchez:

Enclosed please find a copy of the a report titled: *Results of Assessment at Williams Field Services Kutz Plant Lean Oil Tank.* The report was generated following the assessment conducted at your request subsequent to the recent lean oil release at the plant. The release has been previously reported to the New Mexico Oil Conservation Division (OCD) Aztec office.

As stated in the report, WFS believes remaining contamination does not pose a threat to human health and the environment and proposes to essentially "cap" the area with a synthetic liner or concrete containment. WFS asks for OCD approval to implement this approach.

After reviewing the report, should you have questions or need additional information, please call me at 801-584-6361 or Lee Bauerle at 801-584-6999.

Respectfully,

Mark Harvey
Environmental Services

pc: Lee Bauerle - WFS/SLC
Dave Sanders - WFS/KTZ
Denny Foust - OCD/Aztec

RESULTS OF ASSESSMENT

AT

WILLIAMS FIELD SERVICES KUTZ PLANT

LEAN OIL TANK

RECEIVED
MAY - 9 1997
Environmental Bureau
Oil Conservation Division

May 1997

1.0 Introduction

This document describes the methods of investigation and reports on the preliminary findings of the subsurface investigation of the lean oil tank area at Williams Field Services' Kutz Plant in Bloomfield, New Mexico. Field work was conducted at the site on Wednesday, April 16, 1997. The objective of the investigation was to determine concentrations of Total Petroleum Hydrocarbons (TPH) and benzene, toluene, ethyl benzene, and xylene (BTEX) in soil located inside and outside the bermed area surrounding the lean-oil tank.

2.0 Background

On March 18, 1997 an upset condition at the Kutz Plant caused the release of approximately 200 gallons of lean oil from the lean-oil tank. The release impacted surface soil within the bermed area surrounding the tank. In addition, some of the released oil migrated outside of the bermed area. Migration of the oil on the ground surface was controlled topographically and occurred primarily in a northwesterly direction from the northern end of the bermed area. Approximately 350 square feet of soil was impacted within the bermed area. Outside the bermed area approximately 150 square feet was impacted.

Plant personnel immediately took measures to control and contain the release. These measures included shutting off the source, constructing berms, and collecting and removing free liquid oil. Remediation of soil impacted by the release began on March 19th. Impacted soils were excavated and placed in a bermed area for effective landfarming.

Impacted areas were excavated to an average depth of approximately 18 inches below grade. Excavation was directed by visual observation of soil conditions and the presence or absence of hydrocarbon-like odors in the soil. Following the removal of soil believed to be impacted by this release, soil samples were collected from the area to confirm that the cleanup was complete. These sample results indicated elevated levels of BTEX and TPH. Based on these results, the New Mexico Oil Conservation Division (OCD) requested additional investigative action to determine the extent of contamination and to develop a plan to address same.

3.0 Methods

3.1 Soil Sample Collection

Subsurface soil samples were collected using a rotary-hammer drive point system. This system consists of a stainless steel drive point attached to 3-foot lengths of stainless steel rod. The drive point was driven to the desired sampling depth using a rotary hammer. The assembly was then pulled out of the ground and the drive point replaced with a 1-foot long stainless steel sampling spoon. The assembly was then placed back into the hole and driven an additional 1-foot to collect soil from a discrete depth interval.

A total of six locations were sampled; two within the bermed area and four outside the bermed area. Samples were advanced to a maximum depth of 12-feet below grade. Figure 1 shows the sample collection locations.

Soil samples were examined in the field and characterized by the soil type and the absence or the presence of hydrocarbon-like odors or visual indications of hydrocarbon contamination. The samples were them removed from the sampling spoon and placed in laboratory supplied 4-ounce glass jars with Teflon-lined lids. Each jar was labeled with a unique sample identification number that indicated the location and depth interval from which it was collected. The date, time of sample collection, and sampler's initials were also included on the sample label. Samples were then placed into an ice-filled cooler for preservation and transport to the analytical laboratory.

3.2 Prevention of Cross Contamination

To reduce the potential for cross contamination of the samples the stainless steel sampling spoon was decontaminated prior to collecting each sample. The decontamination procedure included removal of gross contamination with a disposable paper wipe, washing in a non-phosphate detergent solution with a scrub brush, rinsing in tap water, rinsing in distilled water, and allowing to air dry. All personnel handling the samples wore disposable vinyl gloves that were discarded and replaced with a new pair after each sample was colleted.

3.3 Laboratory Analysis

Samples were transported under chain-of-custody to American West Analytical Laboratory (AWAL) in Salt Lake City, Utah. The samples were submitted for TPH analysis by EPA Method 8015 (modified) extraction and BTEX analysis by EPA Method 8020.

4.0 Results

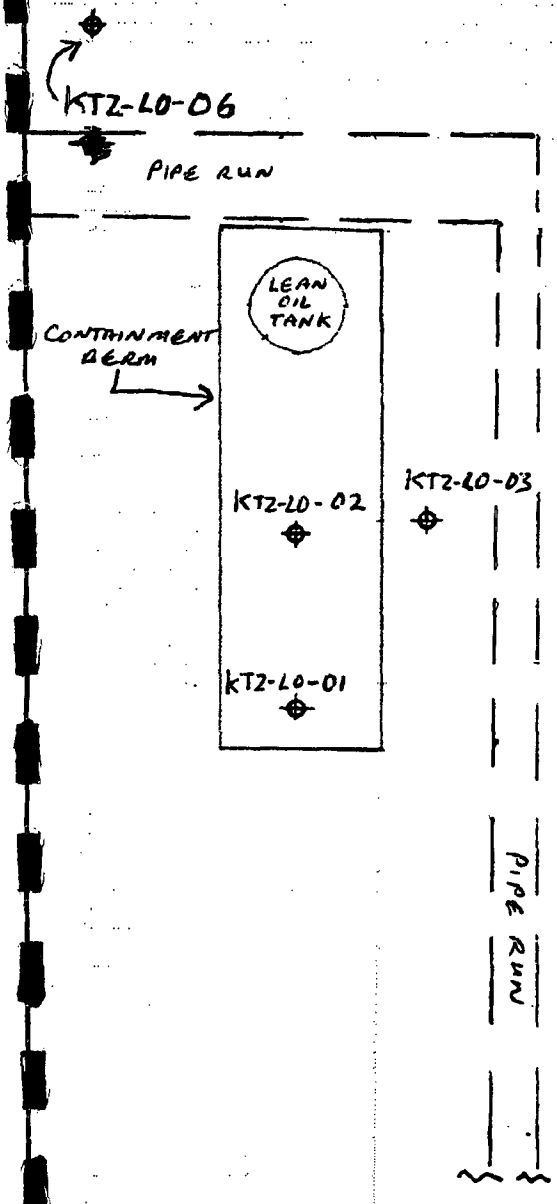
4.1 Field Observations

Table 4.1-1 below summarizes the observations made in the field during this investigation. Soil types were primarily inorganic silts, and clayey silts with moderate plasticity. The upper depth intervals (3-4 foot) contained some fine grained sands with mixed sands and gravel near surface apparently from imported "road base" material.

Hydrocarbon-like odors were detected in the majority of samples. These odors were noted in samples collected from locations both inside and outside the containment berm. The 5-6 foot depth interval sample collected from location KTZ-LO-06, located topographically up gradient from the Lean-Oil tank, had a moderate to strong hydrocarbon-like odor. Samples collected as far as 119-feet west of the bermed containment area had sewer-like odors that may be indicative of weathered hydrocarbons.

PROJECT NO. KUTZ PLANT
BY JPS DATE 4/25/97
CHK'D BY _____ DATE _____
SHEET NO. 1 OF 1

SCALE 1" = 20'



KTZ-LO-04

KTZ-LO-05

FIGURE 1
SITE MAP
UNFS / KUTZ PLANT

Table 4.1-1 Summary of Field Observations

Sample I.D.	Location Description	Depth Interval (feet BGS)	Comments
KTZ-LO-01	42.5' North of center of LO-tank. Within bermed area.	3-4	No obvious hydrocarbon odor.
KTZ-LO-02	24.5' North of center of LO-tank. Within bermed area.	3-4	Strong hydrocarbon odor.
		6-7	Strong hydrocarbon odor.
		9-10	Moderately-strong hydrocarbon odor.
KTZ-LO-03	24' South, 4.75' West of NW corner of containment berm.	5-6	Strong hydrocarbon odor.
		8-9	Strong hydrocarbon odor.
		11-12	Strong hydrocarbon odor
KTZ-LO-04	9' South, 39' West of NW corner of containment berm.	5-6	Sewer-like odor. Possibly weathered hydrocarbon.
		11-12	No comment.
KTZ-LO-05	9' North, 119' West of NW corner of containment berm.	5-6	Sewer-like odor, black-gray staining. Possibly weathered hydrocarbon
KTZ-LO-06	23' South, 13' East of SE corner of containment berm.	5-6	Moderately-strong hydrocarbon odor.
		11-12	No obvious odor.

4.2 Analytical Results

The results indicated that while elevated levels of TPH do exist down to a depth of 12 feet, the concentrations are such that they suggest limited TPH contamination or highly weathered hydrocarbon compounds. Since sewer/sulfur like odors from samples at depth were discernable, it is thought that natural degradation of the hydrocarbons is occuring. The depth of contamination suggests that it resulted not from the recent release, but from historical releases which may have occured in the area. The following table provides the analytical results in summary. Copies of the lab reports are included in Appendix A.

Sample ID	Depth Interval	BTEX (mg/kg)	TPH (mg/kg)
KTZ-LO-01	3 - 4 FT	< 0.10	6.8
KTZ-LO-02	3 - 4 FT	7.83	2000
KTZ-LO-02	6 - 7 FT	0.14	110
KTZ-LO-02	9 - 10 FT	0.79	280
KTZ-LO-03	5 - 6 FT	0.41	120
KTZ-LO-03	8 - 9 FT	< 0.10	48
KTZ-LO-03	11 - 12 FT	0.82	290
KTZ-LO-04	5 - 6 FT	< 0.10	49
KTZ-LO-04	11 - 12 FT	< 0.10	< 2.0
KTZ-LO-05	5 - 6 FT	< 0.10	< 2.0
KTZ-LO-06	5 - 6 FT	0.11	6.5
KTZ-LO-06	11 - 12 FT	< 0.10	< 2.0

5.0 Conclusions

Field observations made during the course of this subsurface investigation suggest that hydrocarbon contamination in soils may exist at the plant in areas outside the area impacted by the recent release from the lean-oil tank. Observations suggest that soil located topographically up gradient of the lean-oil tank may contain concentrations of hydrocarbons. The source of the contaminants is unknown. Due to the fact the the elevation of the site is approximately 6350' above sea level, groundwater has been estimated to be greater than 100'. As such, the risk to protectable fresh water of the state is negligible. When examining the existing "Recommended Remediation Levels" presented in the OCD guidance document concerning TPH and BETX contamination from unlined surface impoundments, the levels of contaminant concentrations discovered at the lean-oil tank are acceptable.

6.0 Further Action

WFS feels confident that the contamination resulting from the March release has been addressed adequately to protect human health and the environment. WFS plans to limit further migration of the remaining contamination by installing an impermeable cap over the area which will serve to limit transport mechanisms (stormwater percolation) which could affect the mobility of remaining contaminants. The cap will also serve to effectively improve the secondary containment for the lean oil tank and mitigate the likelihood of further TPH contamination in the event of a future release. WFS proposes to install a high density polyethylene liner or similar, or concrete slab and curb to satisfy this goal.

APPENDIX A

LABORATORY REPORTS

ORGANIC ANALYSIS REPORT

AMERICAN
WEST
ANALYTICAL
LABORATORIES

463 West 3600 South
Salt Lake City, Utah
84115

(801) 263-8686
Toll Free (888) 263-8686
Fax (801) 263-8687

Client: Williams Field Services
Contact: Mark Harvey

Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction - Sequential GC/PID/FID)

Lab Sample ID:
L29067-Method Blank

Analytical Results — BTX/TPH-E

Units = ppm

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	<0.10
Toluene	0.10	<0.10
Ethylbenzene	0.10	<0.10
Total Xylene	0.10	<0.10
Total Petroleum Hydrocarbons	2.0	<2.0

Released By: Diane Buba
Laboratory Supervisor

Report Date: April 23, 1997

ORGANIC ANALYSIS REPORT

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Client: Williams Field Services
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Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-01 (3-4)
KTZ PLANT

Lab Sample ID:
L29067-1

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	< 0.10
Total Petroleum Hydrocarbons	2.0	**6.8**

% Moisture	**23.%**

* All compounds are reported on a dry weight basis.

Released By: _____
Laboratory Supervisor

Report Date: April 23, 1997

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Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-02 (3-4)
KTZ PLANT

Lab Sample ID:
L29067-2

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	**0.43**
Total Xylene	0.10	**7.4**
Total Petroleum Hydrocarbons	2.0	**2000.**

% Moisture	**9.0%**

* All compounds are reported on a dry weight basis.

Released By: Diane Bolk
Laboratory Supervisor

Report Date: April 23, 1997

ORGANIC ANALYSIS REPORT

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LABORATORIES

463 West 3600 South
Salt Lake City, Utah
84115

(801) 263-8686
Toll Free (888) 263-8686
Fax (801) 263-8687

Client: Williams Field Services
Date Sampled: April 16, 1997
Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-02 (6-7)
KTZ PLANT

Lab Sample ID:
L29067-3

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	**0.14**
Total Petroleum Hydrocarbons	2.0	**110.**

% Moisture	**18.%**

* All compounds are reported on a dry weight basis.

Released By: Dean Baker
Laboratory Supervisor

Report Date: April 23, 1997

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Salt Lake City, Utah
84115

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Fax (801) 263-8687

Client: Williams Field Services
Date Sampled: April 16, 1997
Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-02 (9-10)
KTZ PLANT

Lab Sample ID:
L29067-4

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	**0.16**
Total Xylene	0.10	**0.63**
Total Petroleum Hydrocarbons	2.0	**280.**

% Moisture	**21.%**

* All compounds are reported on a dry weight basis.

Released By: _____
Laboratory Supervisor

Report Date: April 23, 1997

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Client: Williams Field Services
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Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref. Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-03 (5-6)
KTZ PLANT

Lab Sample ID:
L29067-5

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	**0.41**
Total Petroleum Hydrocarbons	2.0	**120.**

% Moisture	**10.%**

* All compounds are reported on a dry weight basis.

Released By: Diane Baker
Laboratory Supervisor

Report Date: April 23, 1997

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Client: Williams Field Services
Date Sampled: April 16, 1997
Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-03 (8-9)
KTZ PLANT

Lab Sample ID:
L29067-6

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	< 0.10
Total Petroleum Hydrocarbons	2.0	**48.**

% Moisture	**7.0%**

* All compounds are reported on a dry weight basis.

Released By: Dave Bailey
Laboratory Supervisor

Report Date: April 23, 1997

ORGANIC ANALYSIS REPORT

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WEST
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LABORATORIES

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Salt Lake City, Utah
84115

(801) 263-8686
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Fax (801) 263-8687

Client: Williams Field Services
Date Sampled: April 16, 1997
Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-03 (11-12)
KTZ PLANT

Lab Sample ID:
L29067-7

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	**0.82**
Total Petroleum Hydrocarbons	2.0	**290.**

% Moisture	**9.0%**

* All compounds are reported on a dry weight basis.

Released By: _____
Laboratory Supervisor

Report Date: April 23, 1997

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Salt Lake City, Utah
84115

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Client: Williams Field Services
Date Sampled: April 16, 1997
Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-04 (5-6)
KTZ PLANT

Lab Sample ID:
L29067-8

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	< 0.10
Total Petroleum Hydrocarbons	2.0	**49.**

% Moisture	**10.%**

* All compounds are reported on a dry weight basis.

Released By: _____
Laboratory Supervisor

Report Date: April 23, 1997

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Client: Williams Field Services
Date Sampled: April 16, 1997
Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-04 (11-12)
KTZ PLANT

Lab Sample ID:
L29067-9

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	< 0.10
Total Petroleum Hydrocarbons	2.0	< 2.0

% Moisture	**10.%**

* All compounds are reported on a dry weight basis.

Released By: Diane Bailey
Laboratory Supervisor

Report Date: April 23, 1997

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Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 22, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-05 (5-6)
KTZ PLANT

Lab Sample ID:
L29067-10

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	< 0.10
Total Petroleum Hydrocarbons	2.0	< 2.0

% Moisture	**10.%**

* All compounds are reported on a dry weight basis.

Released By: Dave Baller
Laboratory Supervisor

Report Date: April 23, 1997

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Client: Williams Field Services
Date Sampled: April 16, 1997
Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 23, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-06 (5-6)
KTZ PLANT

Lab Sample ID:
L29067-11

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	**0.11**
Total Petroleum Hydrocarbons	2.0	**6.5**

% Moisture	**15.%**

* All compounds are reported on a dry weight basis.

Released By: Diane Butler
Laboratory Supervisor

Report Date: April 23, 1997

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Client: Williams Field Services
Date Sampled: April 16, 1997
Date Received: April 21, 1997

Contact: Mark Harvey
Date Extracted: April 22, 1997
Date Analyzed: April 23, 1997

Analysis Requested:
Volatile Aromatics
Total Petroleum Hydrocarbons

Method Ref.Number:
SW-846 #8020/8015 modified
(Extraction-Sequential GC/PID-FID)

Field Sample ID:
KTZ-LO-06 (11-12)
KTZ PLANT

Lab Sample ID:
L29067-12

Analytical Results — BTX/TPH-E

Units = mg/kg(ppm)

Compound:	Reporting Limit:	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	< 0.10
Total Petroleum Hydrocarbons	2.0	< 2.0

% Moisture	**16.%**

* All compounds are reported on a dry weight basis.

Released By: Diane Baker
Laboratory Supervisor

Report Date: April 23, 1997

#29067 215

ANALYTICAS ENVIRONMENTAL LABS

807 S. CARLTON • FARMINGTON, NM 87401 • (505) 326-2395

CHAIN OF CUSTODY

Page 1 of 2

PROJECT MANAGER:
Analytica Lab I.D.:

Company: MH SERVICES, INC
Address: 1717 S. 8th ST
COLORADO SPRING, CO 80906
Phone: 801-584-6361
Fax: 801-584-7760

Bill To: MARK HARVEY
Company: WILLIAMS FIELD SERVICES
Address: 245 CHIARTA WAY
SLC, UT 84158

Sample ID	Date	Time	Matrix	Lab ID	TPH / BTEX 8015 mod	ORGANIC ANALYSES	WATER ANALYSES	METALS	COMMENTS
KTZ-LO-01 (3-4)	4-16-97	1102	SOIL		✓				
KTZ-LO-02 (3-4)	4-16-97	1123	SOIL		✓				
KTZ-LO-02 (6-7)	4-16-97	1215	SOIL		✓				
KTZ-LO-02 (9-10)	4-16-97	1420	SOIL		✓				
KTZ-LO-03 (5-6)	4-16-97	1511	SOIL		✓				
KTZ-LO-03 (8-9)	4-16-97	1535	SOIL		✓				
KTZ-LO-03 (11-12)	4-16-97	1555	SOIL		✓				
KTZ-LO-04 (5-6)	4-16-97	1633	SOIL		✓				

Project Information	Sample Receipt
Proj. #:	No. Containers:
Proj. Name:	Custody Seals: Y / N / NA
P. O. No:	Received Intact:
Shipped Via:	Received Cold:

Required Turnaround Time (Prior Authorization Required for Rush)

CLIENT WAS QUOTED 5 DAY TAT PER DIANE.

Sampled By: JAMES P. STRUHS	Relinquished By:	Relinquished By:
Signature: James P. Struhs Date: 4/17/97	Signature: M. Harvey Date: 4/21/97	Signature: Date:
Company: MH SERVICES, INC. Time: 2040	Company: MHS Time: 8:40a	Company: Time:
Received By:	**Received By:**	**Received By:**
Signature: M. Harvey Date: 4/17/97	Signature: Sherlyn Lewis Date: 4/21/97 8:40	Signature: Date:
Company: MH SERVICES Time: 8:45p	Company: SHERLYN LEWIS Time:	Company: Time:

Please Fill Out Thoroughly.

Shaded areas for lab use only.

White/Yellow: Analytica
Pink: Client

ANALYTICAS ENVIRONMENTAL LABS

807 S. CARLTON • FARMINGTON, NM 87401 • (505) 326-2395

#29067 2176.

CHAIN OF CUSTODY

PROJECT MANAGER:
Analytica Lab I.D.:

Company: MH Services
Address: 1717 S. 8th ST. Colorado, Co 80406
Phone: 801-584-6361
Fax: 801-584-7760

Bill To: Mark Harvey
Company: Williams Field Services
Address: 295 Chipeta Way SLC, UT 84158

Sample ID	Date	Time	Matrix	Lab ID	TPH / BTEX 8015 mod.	ORGANIC ANALYSES	WATER ANALYSES	METALS	COMMENTS
KTZ-LD-04(11-12)	4-16-97	1707	SOIL		✓				
KTZ-LD-05(5-6)	4-16-97	1747	SOIL		✓				
KTZ-LD-06(5-6)	4-16-97	1815	SOIL		✓				
KTZ-LD-06(11-12)	4-16-97	1843	SOIL		✓				

Project Information	Sample Receipt
Proj. #:	No. Containers:
Proj. Name:	Custody Seals: Y / N / NA
P. O. No:	Received Intact:
Shipped Via:	Received Cold:

Required Turnaround Time (Prior Authorization Required for Rush)

Sampled By: James P. Struhs	Relinquished By:	Relinquished By:
Signature / Date: James P. Struhs 4/17/97	Signature / Date: M. Harvey 4/21/97	Signature / Date:
Company / Time: MH Services, Inc. 2040	Company / Time: MHS 8:40a	Company / Time:
Received By:	**Received By:**	**Received By:**
Signature / Date: M. Harvey 4/17/97	Signature / Date: 4/21/97 8:40 Shirlyn Lewis	Signature / Date:
Company / Time: MH Services 8:45p	Company / Time: Cliffrlyn Lewis	Company / Time:

Please Fill Out Thoroughly.

Shaded areas for lab use only.

White/Yellow: Analytica
Pink: Client

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

P 288 258 819

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

Sent to WFS - Harvey	
Street & Number GW-045 "Kutz"	
Post Office, State, & ZIP Code Land Farm - Soil Approval.	
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

May 9, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-819

Mr. Mark Harvey
Project Coordinator
Williams Field Services (WFS)
P.O. Box 58900
Salt Lake City, Utah 84158-0900

RE: One Time Soil Remediation - Approval
Williams Gas Processing-Blanco
GW-045, Kutz Plant
San Juan County, New Mexico

Dear Mr. Harvey:

The OCD has received the letter and information "Results of Land farm Sampling - Discharge Plan Revision" dated April 3, 1997. The OCD on May 9, 1997 received the lab and sample analysis information requested by telephone by the OCD on May 2, 1997. The soil remediation was approved by the OCD on December 12, 1996 as a "Minor Modification" to GW-045 for a volume of 200 cubic yards of contaminated RCRA Subtitle C Exempt soil as certified by WFS on November 11, 1996. **The above mentioned "Results of Land farm Sampling - Discharge Plan Revision" is hereby approved based on the plan that was approved by the OCD on December 12, 1996 and the information listed above, and subject to the following condition:**

- The sample KTZ-LO-V-501 appears to be associated with a "Lean Oil Tank", and not the "Landfarm". WFS will by June 9, 1997 provide the OCD Santa Fe Office with a disclosure regarding this sample and its location at the facility. The BTEX level is at 335 mg/Kg which is greater than 50 mg/Kg, and the TPH is 360 mg/Kg which is greater than 100 mg/Kg.

Be, advised that OCD approval of this work plan does not relieve WFS from liability associated with this soil remediation should it be found at a later date that the procedures taken failed to have adequately remediated the 200 cubic yards of contamination soil. Further, OCD approval does not relieve WFS from responsibility to comply with other federal, state, and local, rules/regulations that may apply.

Sincerely,

Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau - OCD
(505)-827-7156

c: Mr. Denny Foust - Environmental Geologist, Aztec OCD District Office.

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

RECEIVED
MAY - 9 1997
Environmental Bureau
Oil Conservation Division

May 5, 1997

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

RE: DISCHARGE PLAN REVISION AT THE KUTZ PLANT GW- 45

Dear Mr. Sanchez:

Enclosed please find a Discharge Plan Revision for Williams Gas Processing- Blanco (WGP-Blanco) Kutz Plant located near Bloomfield, New Mexico. The revision is intended to cover the establishment of an on-site landfarm to be used when needed.

If you have questions or need additional information, please call me at 801-584-6361 or Lee Bauerle at 801-584-6999.

Respectfully,

Mark Harvey
Environmental Services

pc: Lee Bauerle - WFS/SLC
Dave Sanders - WFS/KTZ
Denny Foust - OCD/Aztec

RECEIVED
MAY - 9 1997
Environmental Bureau
Oil Conservation Division

Williams Gas Processing - Blanco
Kutz Processing Plant
Discharge Plan Revision
May 1997

I. BACKGROUND INFORMATION

On May 5, 1997, Sunterra Gas Proceseeing COMPANY submitted an application for the renewal of the plant's discharge plant (GW-45) to the New Mexico Oil Conservation Division (OCD). The Kutz Plant is located at 190 County Road 4980 in Bloomfield, San Juan County, New Mexico. The plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. The plan (GO-45) was subsequently approved by OCD. Williams Field Services COMPANY purchased the facility in June 1995 and agreed to abide by the provisions of the Discharge Plan. The operating COMPANY which actually owns and operates the facility is Williams Gas Processing-Blanco (WGP-Blanco). According to the terms of the Discharge Plan, WGP-Blanco is required to notify the Director of the OCD of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. This revision addresses the addition of a landfarm for contaminated soils at Kutz Plant.

II. PROPOSED MODIFICATIONS

The Kutz Plant may, from time to time, have releases of exempt waste materials in both reportable and non-reportable quantities. Following the required or recommended cleanup of such material, WGP-Blanco proposes to place impacted soils and gravels in an area outside the plant fence line in an area designated for landfarming. The landfarm area will be constructed in such a way as to limit the likelihood that contaminated soils can migrate from the landfarm. This will be accomplished by constructing earthen berms around the affected soils. Samples from the area underlying the landfarm material and samples of the material landfarmed will be collected as appropriate to measure the impact (if any) to the underlying soils and the effectiveness of landfarming. All landfarm material will be segregated as necessary to ensure new material is not improperly added to material from earlier activity.

The plant intends to reuse the soils and gravels as appropriate when they have been determined to be acceptable for use (i.e. meeting cleanup goals, remediation levels, etc.). Such soils will be used only within the plant grounds and uses will include, but not be limited to, backfill, berm construction, repairing potholes, etc.. In the event non-exempt material is generated by cleanup and/or maintenance activities, such material will be properly analyzed and characterized prior to placement in the landfarm area.

III. SUMMARY

No new liquid wastes will be generated by the proposed modification at this facility. All liquid wastes will be handled in accordance with the OCD approved Discharge Plan (GO-45) and this revision.

IV. AFFIRMATION

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

H. Bauerle — 5/5/97

Signature — Date

H. Lee Bauerle — Environmental Specialist

ANAITAS ENVIRONMENTAL LABS

RECEIVED
MAY - 9 1997
Environmental Bureau
Oil Conservation Division

Organic Analysis - Pit Closure

Williams Field Services, Inc.

Recieved per phone call on 5-2-97 w/ Mr. Harvey w/WFS. DWS 5-9-97

Project ID:	Kutz - LO/LF	Report Date:	04/02/97
Sample ID:	KTZ-LF-V-701	Date Sampled:	03/26/97
Lab ID:	6565	Date Received:	03/26/97
Sample Matrix:	Soil	Date Extracted:	03/27/97
Preservative:	Cool	Date Analyzed:	3/27-28/97
Condition:	Intact		

Target Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Aromatic Hydrocarbons	**ND**	
Benzene	ND	0.60
Toluene	ND	0.60
Ethylbenzene	ND	0.60
m,p-Xylenes	ND	1.20
o-Xylene	ND	0.60
Total Recoverable Petroleum Hydrocarbons	**ND**	**31.0**

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Trifluorotoluene	98	81 - 117%
	Bromofluorobenzene	94	74 - 121%
	o-Terphenyl	98	50 - 150 %

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Recoverable Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July, 1992.

EPA Method 8015A, modified. "Nonhalogenated Volatile Organics by Gas Chromatography." Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods, SW-846, 3rd Ed, Final Update I, July, 1992. USEPA.

Comments:

Review

ANAITAS ENVIRONMENTAL LABS

Organic Analysis - Pit Closure

Williams Field Services, Inc.

Project ID:	Kutz - LO/LF	Report Date:	04/02/97
Sample ID:	KTZ-LF-DG-01	Date Sampled:	03/26/97
Lab ID:	6566	Date Received:	03/26/97
Sample Matrix:	Soil	Date Extracted:	03/27/97
Preservative:	Cool	Date Analyzed:	03/27/97
Condition:	Intact		

Target Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Aromatic Hydrocarbons	**ND**	
Benzene	ND	0.60
Toluene	ND	0.60
Ethylbenzene	ND	0.60
m,p-Xylenes	ND	1.19
o-Xylene	ND	0.60
Total Recoverable Petroleum Hydrocarbons	**ND**	**30.5**

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Trifluorotoluene	98	81 - 117%
	Bromofluorobenzene	93	74 - 121%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Recoverable Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July, 1992.

Method 3550 - Sonication Extraction; Test Methods for Evaluating Solid Waste, SW-846, United States Environmental Protection Agency, September, 1986; Method 418.1 - Petroleum Hydrocarbons, Total Recoverable; Chemical Analysis of Water and Waste, United States Environmental Protection Agency, 1978.

Comments:

Review

ANAITAS ENVIRONMENTAL LABS

Organic Analysis - Pit Closure

Williams Field Services, Inc.

Project ID:	Kutz - LO/LF	Report Date:	04/02/97
Sample ID:	KTZ-LO-V-501	Date Sampled:	03/26/97
Lab ID:	6567	Date Received:	03/26/97
Sample Matrix:	Soil	Date Extracted:	03/27/97
Preservative:	Cool	Date Analyzed:	3/27-28/97
Condition:	Intact		

Target Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Aromatic Hydrocarbons	**335**	
Benzene	ND	0.75
Toluene	10.7	0.75
Ethylbenzene	26.1	7.46
m,p-Xylenes	254	14.9
o-Xylene	44.2	7.46
Total Recoverable Petroleum Hydrocarbons	**360**	**32.9**

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Trifluorotoluene	99	81 - 117%
	Bromofluorobenzene	99	74 - 121%
	o-Trephenyl	98	50 - 150 %

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Recoverable Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July, 1992.

EPA Method 8015A, modified. "Nonhalogenated Volatile Organics by Gas Chromatography." Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods, SW-846, 3rd Ed, Final Update I, July, 1992. USEPA.

Comments:

Review

ANAITAS ENVIRONMENTAL LABS

Organic Analysis - Pit Closure

Williams Field Services, Inc.

Project ID:	Kutz - LO/LF	Report Date:	04/03/97
Sample ID:	KTZ-LFBS-V-301	Date Sampled:	03/26/97
Lab ID:	6568	Date Received:	03/26/97
Sample Matrix:	Soil	Date Extracted:	03/27/97
Preservative:	Cool	Date Analyzed:	03/27/97
Condition:	Intact		

Target Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Aromatic Hydrocarbons	**ND**	
Benzene	ND	0.76
Toluene	ND	0.76
Ethylbenzene	ND	0.76
m,p-Xylenes	ND	1.51
o-Xylene	ND	0.76
Total Recoverable Petroleum Hydrocarbons	**ND**	**29.9**

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Trifluorotoluene	92	81 - 117%
	Bromofluorobenzene	90	74 - 121%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Recoverable Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July, 1992.

Method 3550 - Sonication Extraction; Test Methods for Evaluating Solid Waste, SW-846, United States Environmental Protection Agency, September, 1986; Method 418.1 - Petroleum Hydrocarbons, Total Recoverable; Chemical Analysis of Water and Waste, United States Environmental Protection Agency, 1978.

Comments:

Review

VOLATILE AROMATIC HYDROCARBONS
QUALITY CONTROL REPORT

Method Blank Analysis

Sample Matrix: Soil
Lab ID: MB35516

Report Date: 04/02/97
Date Extracted: 03/27/97
Date Analyzed: 03/27/97

Target Analyte	Concentration (ug/kg)	Detection Limit (ug/kg)
Benzene	ND	100
Toluene	ND	100
Ethylbenzene	ND	100
m,p-Xylenes	ND	200
o-Xylene	ND	100

ND - Analyte not detected at the stated detection limit.

Quality Control:

Surrogate	Percent Recovery	Acceptance Limits
Trifluorotoluene	100	81-117%
Bromofluorobenzen	95	74-121%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Volatile Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July 1992.

Comments:

Analyst

Review

VOLATILE AROMATIC HYDROCARBONS

Duplicate Analysis

Lab ID:	6567	Report Date:	03/28/97
Sample Matrix:	Soil	Date Sampled:	03/26/97
Preservative:	Cool	Date Received:	03/26/97
Condition:	Intact	Date Extracted:	03/27/97
		Date Analyzed:	3/27-28/97

Target Analyte	Original Conc. (mg/kg)	Duplicate Conc. (mg/kg)	Acceptance Range (mg/kg)
Benzene	ND	ND	NA
Toluene	10.7	11.8	8.24 - 14.2
Ethylbenzene	26.1	28.2	15.4 - 34.1
m,p-Xylenes	254	278	NE
o-Xylene	44.2	48.6	NE

ND - Analyte not detected at the stated detection limit.
NA - Not applicable or not calculated.
NE - Duplicate acceptance range not established by the EPA.

Quality Contro

Surrogate	% Recovery	Acceptance Limits
Trifluorotoluene	95	81 - 117%
Bromofluorobenzene	98	74 - 121%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Volatile Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July, 1992.

Comments:

Analyst

Review

VOLATILE AROMATIC HYDROCARBONS

Matrix Spike Analysis

Lab ID:	MB35516Spk	Report Date:	04/02/97
Sample Matrix:	Soil	Date Sampled:	NA
Preservative:	NA	Date Received:	NA
Condition:	NA	Date Extracted:	03/27/97
		Date Analyzed:	03/27/97

Target Analyte	Spike Added. (mg/kg)	Original Conc. (mg/kg)	Spiked Sample Conc. (mg/kg)	% Recovery	Acceptance Limits (%)
Benzene	200	ND	182	91%	39-150
Toluene	200	ND	206	103%	32-160
Ethylbenzene	200	ND	203	101%	46-148
m,p-Xylenes	400	ND	412	103%	NE
o-Xylene	200	ND	209	104%	NE

ND - Analyte not detected at the stated detection limit.
NA - Not applicable or not calculated.
NE - Spike acceptance range not established by the EPA.

Quality Contro

Surrogate	% Recovery	Acceptance Limits
Trifluorotoluene	97	81 - 117%
Bromofluorobenzene	98	74 - 121%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Volatile Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, September 1986.

Comments:

Analyst

Review

QUALITY CONTROL REPORT
TOTAL RECOVERABLE PETROLEUM HYDROCARBONS
Diesel Range Organics

Method Blank Analysis

Project ID:	NA	Report Date:	04/02/97
Sample Matrix:	Soil	Date Sampled:	NA
Preservative:	NA	Date Received:	NA
Condition:	NA	Date Extracted:	03/28/97
		Date Analyzed:	03/31/97

Sample ID	Lab ID	Concentration (mg/kg)	Detection Limit (mg/kg)
Method Blank	MB35517	ND	20.0

ND- Analyte not detected at the stated detection limit.

Quality Control:

Surrogate	% Recovery	Acceptance Limits
o - Terphenyl	109%	50 - 150%

Reference: EPA Method 8015A, modified. "Nonhalogenated Volatile Organics by Gas Chromatography." Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods, SW-846, 3rd Ed, Final Update I, July, 1992. USEPA.

Comments:

Analyst

Review

QUALITY CONTROL REPORT
TOTAL RECOVERABLE PETROLEUM HYDROCARBONS
Diesel Range Organics

Matrix Spike Analysis

Project ID:	NA	Report Date:	04/02/97
Sample Matrix:	Soil	Date Sampled:	NA
Preservative:	NA	Date Received:	NA
Condition:	NA	Date Extracted:	03/28/97
		Date Analyzed:	03/31/97

Lab ID	Spike Added (mg/kg)	Original Conc. (mg/kg)	Spike Conc. (mg/kg)	Percent Recovery
MBSPK35520	2,380	ND	2,170	91%

ND- Analyte not detected at the stated detection limit.

Reference: EPA Method 8015A, modified. "Nonhalogenated Volatile Organics by Gas Chromatography." Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, 3rd Ed, Final Update I, July, 1992. USEPA.

Comments:

Analyst

Review

ANAITAS ENVIRONMENTAL LABS

807 S. CARLTON • FARMINGTON, NM 87401 • (505) 326-2395

CHAIN OF CUSTODY

Page 1 of 1

PROJECT MANAGER:
Analytica Lab I.D.:

Company: WILLIAMS FIELD
Address: SLC, UT

Phone: 584-6361 (801)
Fax: (801) 584-6483

Bill To: WFS
Company:
Address:

Sample ID	Date	Time	Matrix	Lab ID	TPH / BTEX (ORGANIC ANALYSES)	WATER ANALYSES	METALS	COMMENTS
KTZ-LF-V-701	3/26/97	10:27a	SOIL		X			LAND FARM
KTZ-LF-DG-01	3/26/97	10:51a	"		X			LF - DOWNGRADIENT
KTZ-LO-V-501	3/26/97	9:55a	"		X			LEAN OIL TANK
KTZ-LFBS-V-301	3/26/97	10:43	"		X			LF (BGS)

Project Information	Sample Receipt
Proj. #:	No. Containers:
Proj. Name: KTZ-LO/LF	Custody Seals: Y / N / NA
P. O. No:	Received Intact:
Shipped Via:	Received Cold:

Required Turnaround Time (Prior Authorization Required for Rush)

AS QUICKLY AS POSSIBLE

Sampled By: MARK HARVEY	Relinquished By:	Relinquished By:
Signature / Date: M. Harvey 3/26/97	Signature / Date:	Signature / Date:
Company: WFS / Time: 5:05p	Company: / Time:	Company: / Time:
Received By:	**Received By:**	**Received By:**
Signature / Date:	Signature / Date:	Signature / Date: [signature] 3/26/97
Company: / Time:	Company: / Time:	Company: Anaitas / Time: 17:05

Please Fill Out Thoroughly.

Shaded areas for lab use only.

White/Yellow: Analytica
Pink: Client

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

Spoke to Mr. Harvey on 5-2-97 at 4:10 pm - told him that I needed the original lab sheets and chain of Custody forms(5).

April 3, 1997

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

RE: RESULTS OF LANDFARM SAMPLING- DISCHARGE PLAN REVISION

Dear Mr. Sanchez:

Pursuant to the Discharge Plan Revision (GW-45) dated November 26, 1996, Williams Field Services (WFS) hereby submits this "Closure Report" consistent with the requirements of the New Mexico Oil Conservation Division (OCD) approval letter of December 12, 1996.

The landfarm area used for remediating soils generated by segregating soil and gravel was recently sampled consistent with the conditions of approval. Attached are the laboratory reports following sample analysis. These results are summarized in the table below:

SAMPLE IDENTIFICATION	BENZENE (mg/kg)	BTEX (mg/kg)	TPH (mg/kg) Method 418.1
KTZ-LFBS-V-301	ND	ND	ND
KTZ-LF-V-701	ND	ND	ND
KTZ-LF-DG-01	ND	ND	ND

The first sample is a three point composite from two feet below the remediated soil. The second sample is the composite sample collected from seven points from the landfarm soil. The third sample (KTZ-LF-DG-01) is the sample collected outside the berm of the landfarm three feet below ground surface. As evidenced by the attached laboratory reports, all samples were found to have contamination below detection limits (non-detect).

As originally proposed, WFS plans to utilize this soil throughout the plant. Uses will include, but not be limited to, earthen berm construction and repair, erosion control, and fill material following removal of contaminated soil inside the facility perimeter.

If you need any additional information, please call me at 801-584-6361 or Lee Bauerle at 801-584-6999.

Respectfully,

Mark Harvey
Environmental Services

pc: Lee Bauerle - WFS/SLC
Dave Sanders - WFS/KTZ

ANAITAS ENVIRONMENTAL LABS

Organic Analysis - Pit Closure

Williams Field Services, Inc.

Project ID:	Kutz - LO/LF	Report Date:	04/02/97
Sample ID:	KTZ-LF-V-701	Date Sampled:	03/26/97
Lab ID:	6565	Date Received:	03/26/97
Sample Matrix:	Soil	Date Extracted:	03/27/97
Preservative:	Cool	Date Analyzed:	3/27-28/97
Condition:	Intact		

Target Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Aromatic Hydrocarbons	**ND**	
Benzene	ND	0.60
Toluene	ND	0.60
Ethylbenzene	ND	0.60
m,p-Xylenes	ND	1.20
o-Xylene	ND	0.60
Total Recoverable Petroleum Hydrocarbons	**ND**	**31.0**

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Trifluorotoluene	98	81 - 117%
	Bromofluorobenzene	94	74 - 121%
	o-Terphenyl	98	50 - 150 %

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Recoverable Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July, 1992.

EPA Method 8015A, modified. "Nonhalogenated Volatile Organics by Gas Chromatography." Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods, SW-846, 3rd Ed, Final Update I, July, 1992. USEPA.

Comments:

Review

ANAITAS
ENVIRONMENTAL LABS

Organic Analysis - Pit Closure

Williams Field Services, Inc.

Project ID:	Kutz - LO/LF	Report Date:	04/02/97
Sample ID:	KTZ-LF-DG-01	Date Sampled:	03/26/97
Lab ID:	6566	Date Received:	03/26/97
Sample Matrix:	Soil	Date Extracted:	03/27/97
Preservative:	Cool	Date Analyzed:	03/27/97
Condition:	Intact		

Target Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Aromatic Hydrocarbons	**ND**	
Benzene	ND	0.60
Toluene	ND	0.60
Ethylbenzene	ND	0.60
m,p-Xylenes	ND	1.19
o-Xylene	ND	0.60
Total Recoverable Petroleum Hydrocarbons	**ND**	**30.5**

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Trifluorotoluene	98	81 - 117%
	Bromofluorobenzene	93	74 - 121%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Recoverable Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July, 1992.

Method 3550 - Sonication Extraction; Test Methods for Evaluating Solid Waste, SW-846, United States Environmental Protection Agency, September, 1986; Method 418.1 - Petroleum Hydrocarbons, Total Recoverable; Chemical Analysis of Water and Waste, United States Environmental Protection Agency, 1978.

Comments:

Review

ANAITAS ENVIRONMENTAL LABS

Organic Analysis - Pit Closure

Williams Field Services, Inc.

Project ID:	Kutz - LO/LF	Report Date:	04/02/97
Sample ID:	KTZ-LF-V-701	Date Sampled:	03/26/97
Lab ID:	6565	Date Received:	03/26/97
Sample Matrix:	Soil	Date Extracted:	03/27/97
Preservative:	Cool	Date Analyzed:	3/27-28/97
Condition:	Intact		

Target Analyte	Concentration (mg/kg)	Detection Limit (mg/kg)
Total Aromatic Hydrocarbons	**ND**	
Benzene	ND	0.60
Toluene	ND	0.60
Ethylbenzene	ND	0.60
m,p-Xylenes	ND	1.20
o-Xylene	ND	0.60
Total Recoverable Petroleum Hydrocarbons	**ND**	**29.9**

Quality Control:	Surrogate	Percent Recovery	Acceptance Limits
	Trifluorotoluene	98	81 - 117%
	Bromofluorobenzene	94	74 - 121%

Reference: Method 5030, Purge and Trap; Method 8020, Aromatic Recoverable Organics; Test Methods for Evaluating Solid Wastes, SW-846, United States Environmental Protection Agency, Final Update I, July, 1992.

Method 3550 - Sonication Extraction; Test Methods for Evaluating Solid Waste, SW-846, United States Environmental Protection Agency, September, 1986; Method 418.1 - Petroleum Hydrocarbons, Total Recoverable; Chemical Analysis of Water and Waste, United States Environmental Protection Agency, 1978.

Comments:

Review