GW - 198

GENERAL CORRESPONDENCE

YEAR(S):

2006-1993

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

November 7, 2007

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

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

Dear Mr. Lowe,

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

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

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

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

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

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

Respectfully submitted,

David Bays
Senior Environmental Specialist

Attachment

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	500 gal*	Berm or concrete pad and wastewater system	Non-exempt	May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Produced Water/Natural Gas Condensate	Above Ground Storage Tank	300 bbl 120 bbl 40 bbl	Berms	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at **any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.**
Wash-down Water	Below Grade Sump, vaulted	70 bbl 45 bbl	Dual-walled tanks	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to **any facility permitted by any state, federal, or tribal agency to receive industrial solid waste;** or evaporation at Williams' facility may be considered. **Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such waste.**
Used Oil Filters	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at any facility permitted by **any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.** A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Used Process Filters	Drum or other container	Varies	Transported in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at **any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste.** A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Spill Residue (e.g., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at **any facility permitted by any state, federal, or tribal agency to receive industrial solid waste. Any waste that is determined to be hazardous as defined by 40 CFR 260-265 will be disposed only at a facility permitted to accept such hazardous waste**. A Waste Acceptance Profile will be filed with the disposal facility as necessary. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non - exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank		Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	500 gal* 125 gal* 100 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	500 gal*	Berm or concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Produced Water/Natural Gas Condensate	**Inlet Scrubber, Gas Inlet Separator, Dehydrators**	2000-8000 bbl/year	No Additives
Waste Water /Wash Down Water	Compressor and Dehy Skids	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	50-500/year/engine	No Additives
Used Process Filters	**Charcoal, Activated Carbon, Molecular Sieve**	**50-500 cubic yd/yr**	**No Additives**
Used Process Filters	**Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol**	75-500/year	No Additives
Empty Drums/Containers	Liquid Containers	0-80/year	No Additives
Spill Residue (i.e. soil, gravel, etc)	Incidental Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incidental Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives

2006 AUG 23 AM 11 44

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

August 22, 2006

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

Re: Change of Company Name

Dear Mr. Price;

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

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

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

Sincerely,

David Bays
Senior Environmental Specialist

Attachments

xc: Clara Cardoza
Monica Sandoval
WFS FCA file 210

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

October 4, 2005

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

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

Dear Mr. Ford:

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

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

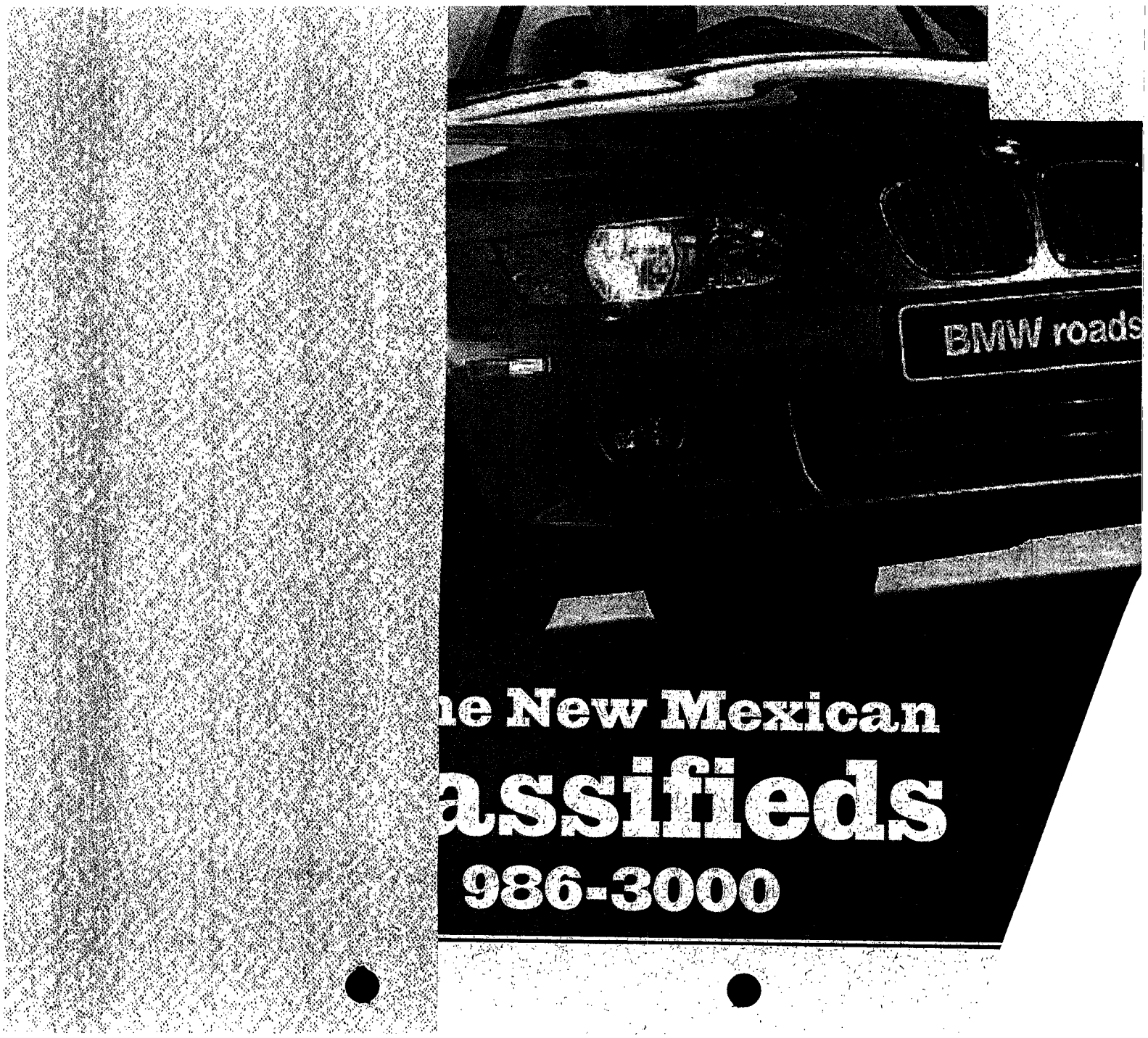
Check number 4027004660 in the amount of $600.00 was previously submitted to cover the filing fees. Williams Field Services appreciates your assistance in handling these applications and fees. If you have any questions or require additional information, please contact me at 505/632/4625.

Thank you,

Monica Sandoval

Monica Sandoval
Environmental Compliance

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


BMW roads
he New Mexican
assifieds
986-3000

AFFIDAVIT OF PUBLICATION

Ad No. 52023

STATE OF NEW MEXICO
County of San Juan:

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

Monday, July 25, 2005.

And the cost of the publication is $168.46.

Connie Pruitt

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

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

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

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

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

(GW-320) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Richardson Straddle compressor station located in the SW/4 NE/4, Section 27, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in above ground, in a closed-top fiberglass tank prior to transport to an

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No [redacted] dated 6/21/05,

or cash received on _____ in the amount of $ 600.00

from Williams Field Services

for 6 Compressor Stations - see attached
(Facility Name)

Submitted by: _____ Date: 7-12-05 (OP 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

[redacted]

DATE 06/21/2005

PAY TO THE ORDER OF

PAY ➔ $**********600.00

USD

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

SANTA FE NM 87505
UNITED STATES

Authorized Signer

SUPPLIER NUMBER
403816

VOID VOID VOID VOID VOID VOID VOID VOID

[redacted]

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

June 30, 2005

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

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

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application renewal and check number 4027004660 for $600.00 to cover the filling fee for the following Williams Field Services (WFS) Compressor Stations:

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

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

Thank you,

Monica Sandoval

Monica Sandoval
Environmental Compliance

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

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

April 4, 2005

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

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

RE: Discharge Permit Renewal Notice for Williams Field Services Facilities

Dear Ms. Garcia:

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

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

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

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

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

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

Sincerely,

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

cc: OCD Artesia District Office

Williams
Four Corners Area
Environmental Department
#188 CR 4900
Bloomfield, N.M. 87413

RECEIVED
DEC 0 7 2001
Environmental Bureau
Oil Conservation Division

December 7, 2001

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

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

Dear Mr. Ford:

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

Facility	Permit #	Completion Date	Results	Comments
29-6#3 CDP	GW-198	9/13/2001	Passed	
32-9 CDP	GW-091	9/28/2001	Passed	
Blanco Compressor	GW-327	NA	NA	No drain lines to be tested.
Cedar Hill CDP	GW-087	9/19/2001	Passed	
Chaco Compressor	GW-331	NA	NA	No drain lines to be tested.
Coyote Springs Compressor	GW-250	9/12/2001	Passed	
Dogie Compressor	GW-330	NA	NA	No drain lines to be tested.
Hare Compressor	GW-343	8/27/2001	Passed	
Keblah Compressor	GW-329	NA	NA	No drain lines to be tested.
Kernaghan Compressor	GW-271	9/12/2001	Passed	
Kutz NGL Pump Station	GW-334	8/31/2001	Passed	UST leak detection sys. is OK
La Jara Compressor	GW-233	NA	NA	No drain lines to be tested.
Middle Mesa CDP	GW-064	10/9/2001	Passed	
Milagro Plant	GW-060	8/20/2001	Passed	
Pritchard Compressor	GW-274	9/6/2001	Passed	
Pump Mesa CDP	GW-063	10/23/2001	Passed	
Thompson Compressor	GW-328	NA	NA	No drain lines to be tested.

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

Sincerely;

Mark J. Bareta
Senior Environmental Specialist

Attachments: Drain Line Testing Reports
xc: Denny Foust, Aztec OCD

October 29, 2001
AMEC Project No. 1-517-000086

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

RE: Drain Line Testing
Williams Field Services 29-6 #3 Compressor Station
Rio Arriba County, New Mexico

Dear Mr. Bareta,

AMEC Earth & Environmental, Inc. (AMEC) is pleased to provide Williams Field Services (WFS) with results of hydrostatic testing for the subsurface, non-pressurized, process and wastewater drain system at the WFS 29-6 #3 Compressor Station located in rural Rio Arriba County, New Mexico. Only subsurface, non-pressurized process and wastewater lines were tested according to the facilities' Oil Conservation Division (OCD) Ground Water Discharge Plan requirements.

AMEC mobilized to the site and began drain line testing activities on September 13, 2001. The work was completed the same day. AMEC's on-site crew consisted of Bruce Hare (Site Supervisor) and a 3-man field crew.

The underground pipelines carrying process or wastewater were isolated. Each isolated system was filled with clean water and air was removed. A water-filled riser of sufficient height was used to provide a minimum of 3 pounds per square inch above normal operating pressure (all risers were at least 8-feet in height). A system was considered passing or non-leaking when the height of the water column held steady for a period of 60 minutes. Any leaks encountered were repaired and the system was re-tested until the passing criteria described above was met.

Details of each drain line tested are summarized in the attached Pressure Test Reports.

In keeping with WFS's policy, along with AMEC's own internal Health and Safety policies, AMEC's on-site employees attended daily safety meetings.

AMEC Earth & Environmental, Inc.
2060 Afton Place
Farmington, New Mexico, USA
Tel 1+505-327-7928
Fax 1+505-326-5721
www.amec.com

Williams Field Services
Drain Line Testing-29-6 #3 Compressor Station
Phase 3, Task 10
October 29, 2001

AMEC appreciates the opportunity to perform these services at the 29-6 #3 Compressor Station for WFS. Should you have any questions, please feel free to contact our office at 327-7928.

Respectfully submitted,

AMEC Earth & Environmental, Inc.

Robert Thompson
Project Manager

Attachments: Daily Summary of Line Testing

Copies: Addressee (3)

Hydrostatic Line Testing Form

amec

AMEC Project Number: 1517000064 **Client:** Williams Field Services

Task: 10 **Facility Name:** 29-6 #3 compresson station

Test Description: Hydrostatic Test

System Description: Drain lines From compresson and DeHY to UST

Test Medium: Water **Test Pressure:** 3 PSI **Test Date:** 9-13-01

Test Requirements: Hydrostatic pressure test on all underground process/wastewater pipelines in accordance with the State of New Mexico, Energy, Minerals, and Natural Resources Department - Oil Conservation Division Best Management Practices minimum requirements. Perform a hydrostatic pressure test on underground process/wastewater pipelines at 3 pounds per square inch for a period of one hour.

Test Data:

Start	Stop	Pressure	Pass/Fail	Lines Tested
1250	1350	89"wc 3+PSI	Pass	2" Drains OFF of Compresson to Under-Ground storage tank
1425	1525	94"wc 3+PSI	Pass	DeHy Skid to 4" clean out to under-Ground storage TANK

Review and Approvals:

Morgan Killion	Morgan Killion	9-13-01
AMEC Representative Signature	**Printed Name**	**Date**
Mike Harris	MIKE HARRIS	9-13-1
Client Representative Signature	**Printed Name**	**Date**

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

May 29, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0487

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

RE: Facility Inspections
Rio Arriba and San Juan County, New Mexico

Dear Ms. Garcia:

The New Mexico Oil Conservation Division (OCD) on May 23, 2001, along with Williams Field Service (WFS) personnel Ms. Clara Garcia, Mr. Mark Bareta, Mr. Erick Edmondson, and Mr. Greg Millican inspected the Milagro Gas Plant; on May 24, 2001 the OCD along with Ms. Clara Garcia, Mr. Don Molander, and Mr. Alan Haynes inspected the 29-6 #3 Compressor Station and the Pump Mesa Compressor Station. On May 24, 2001, the OCD along with Williams Field Services personnel Ms. Clara Garcia, Mr. Eric Edmonson, Mr. David Corbett, and Mr. Alan Haynes inspected the Horse Canyon compressor station. The purpose was pre-inspections for renewal of discharge plans for these facilities. The information that follows will address the concerns of the OCD at the above referenced facilities.

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

1. **Milagro Gas Plant,(Inspected 05/23/01)**

   A. The overall housekeeping and pollution prevention in place at the site was generally good to prevent discharges to the ground surface. It should be noted that the used oil and produced oil tanks at the site require some labeling.

   B. The OCD has some concern with piping integrity in the area of the plant which has experienced some ground settling specifically in Trains #1, #2, and #3. Close inspection and observation by Williams Field Service personnel will be necessary to maintain an awareness of conditions in these locations to prevent an accidental unauthorized release.

2. **29-6 #3 Compressor Station,(Inspected 05/24/01)**

   A. General housekeeping at the site is good.

   B. Waste issues - lined and bermed area around the production tank indicates overflow of the tank. Remediation of the hydrocarbon stained gravel and tank is required. Steps should be taken to prevent a reoccurance of this condition.

   C. Production tank requires appropriate label.

3. **Pump Mesa Compressor Station, (Inspected 05/24/01)**

   A. The surface gravel and soils around the base of all compressors has hydrocarbon staining from leaks and spills. Remediation of these areas require immediate attention.

   B. Free standing used engine oil was noted on the concrete base of several compressors. Absorbant pads should be used where applicable and free used oil not be allowed to pool on the concrete foundation pad.

   C. Stained soil was observed around the base of the condensate tank where overflow has occurred. This must be remediated.

   D. A continuous drip appears to be present below the meter box on TK-C11 compressor.

   E. Produced water tank overflow and produced water hose connection catchment requires close observation to eliminate the potential of spilling.

4. **Horse Canyon Compressor Station, (Inspected 05/24/01)**

   A. General housekeeping at the site is good.

   B. Leaks from automatic valves were noted at the evaporator. Catchment vessels need to be placed to prevent spillage onto the ground surface.

   C. Unlabeled drums and barrels require labeling of contents. All empty drums and barrels must be placed horizontal with bungs in place and horizontal alignment.

D. Remediation of spills and overflows around compressor bases is required.

E. On site landfarm of hydrocarbon contaminated soils requires an approval by the OCD. No request for modification of the discharge plan or approval for this activity has been found in the files at the Santa Fe office. Williams Field Services is currently in violation of OCD Rules. A request for modification must be filed with the OCD immediately for review and approval. No additional materials will be added to the landfarming activity until such approval is obtained from the OCD.

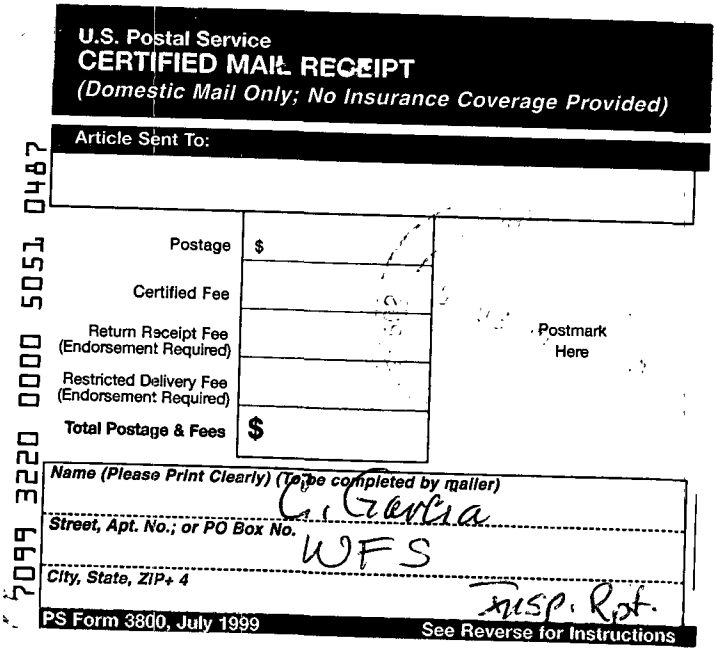
The OCD would like to thank the Williams Field Services personnel for their professional conduct during the site visits. If there any questions regarding this report feel free to call me at (505)-476-3489.

Sincerely,

Original Signed

W. Jack Ford, C.P.G.
Water Resource Engineering Specialist
OCD Environment Bureau

cc: OCD Aztec District Office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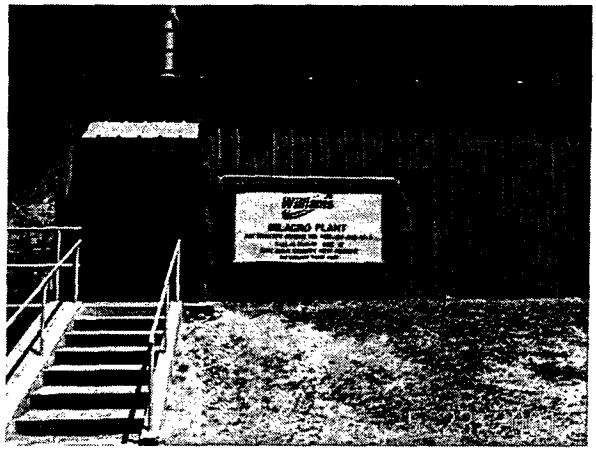
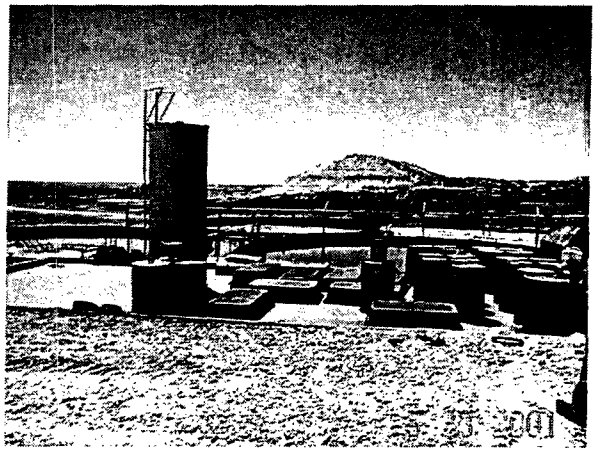
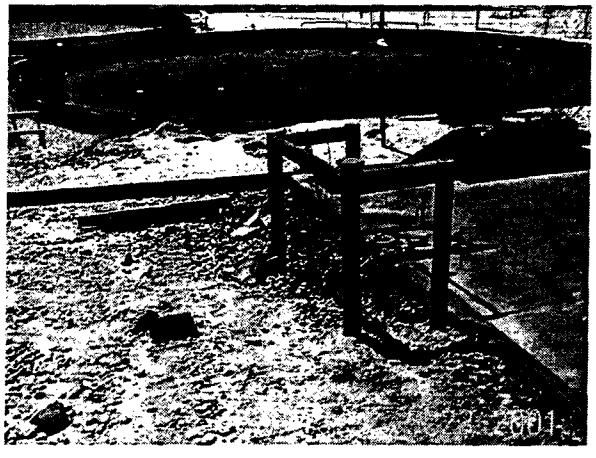
C. Garcia
Street, Apt. No.; or PO Box No.
WFS
City, State, ZIP+ 4
Insp. Rpt.

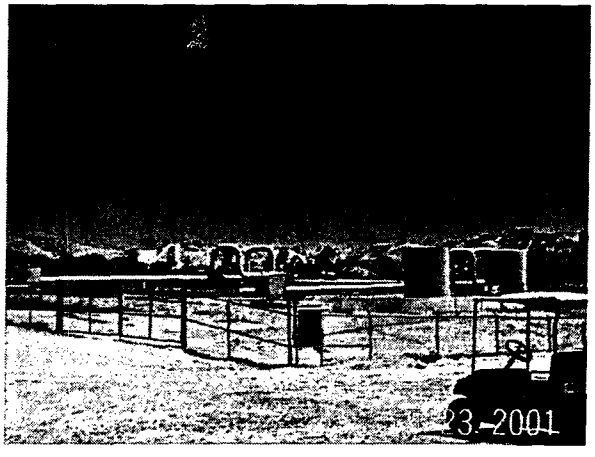
PS Form 3800, July 1999 See Reverse for Instructions

ATTACHMENT NO.1
Milagro Gas Plant

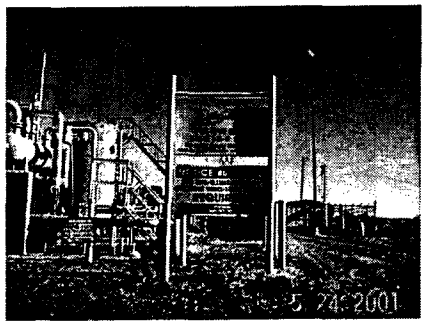


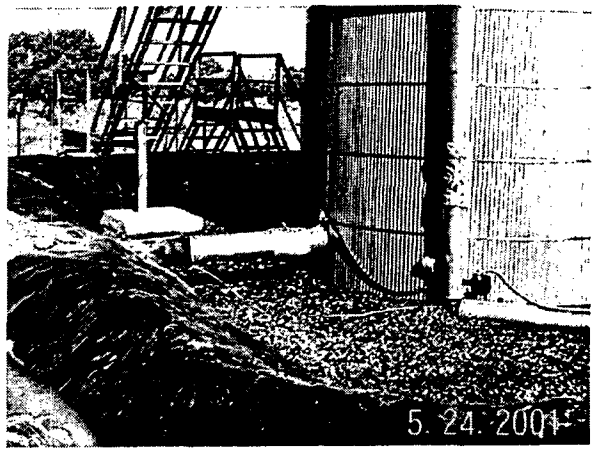


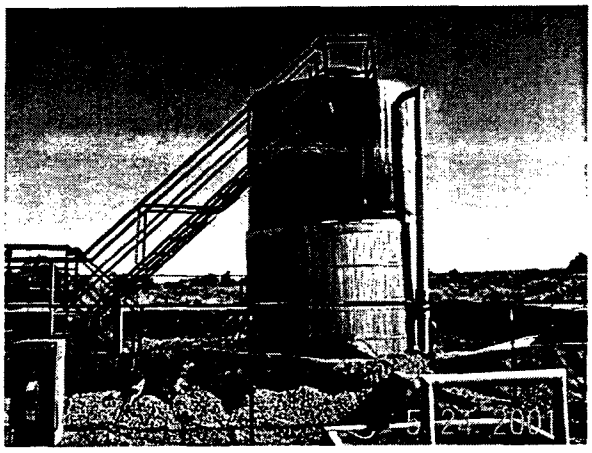


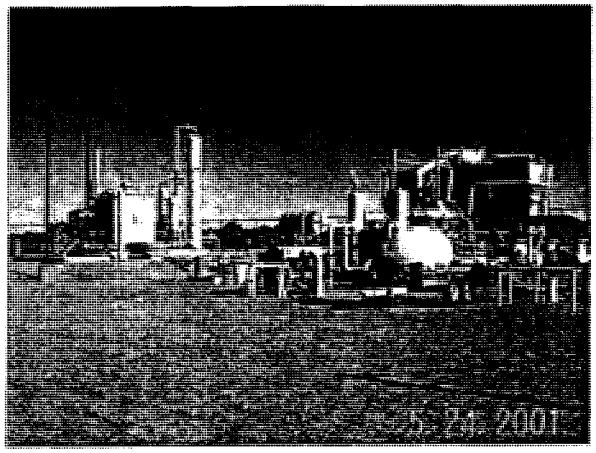


ATTACHMENT NO.2
29-6 #3 Compressor Station

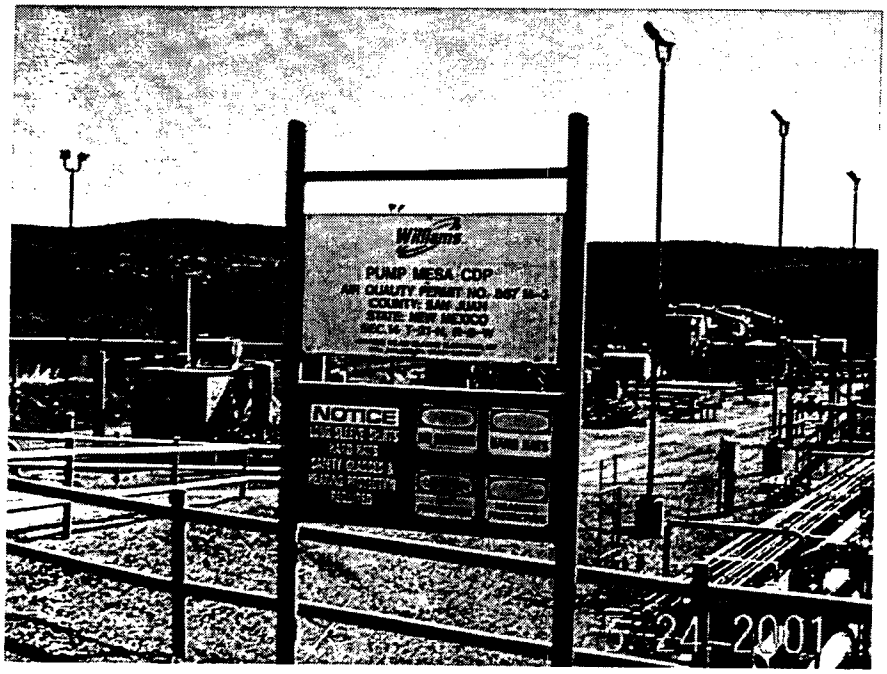


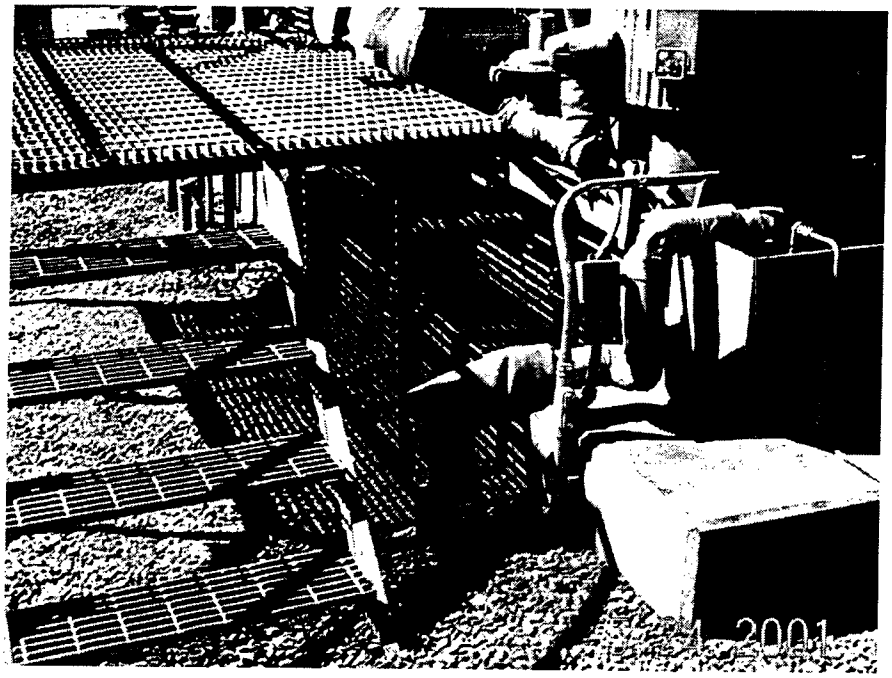






ATTACHMENT NO.3
Pump Mesa Compressor Station





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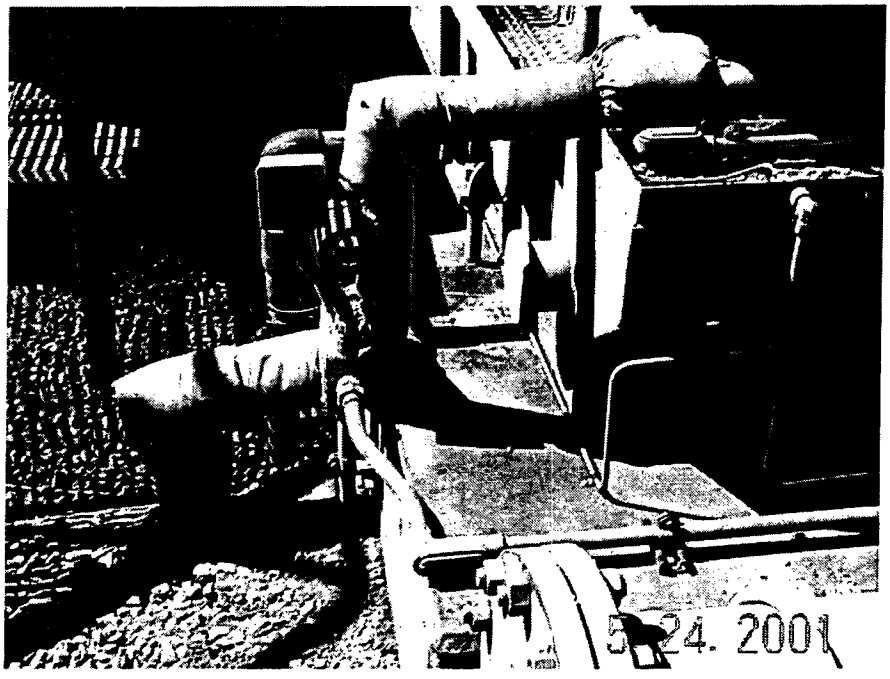

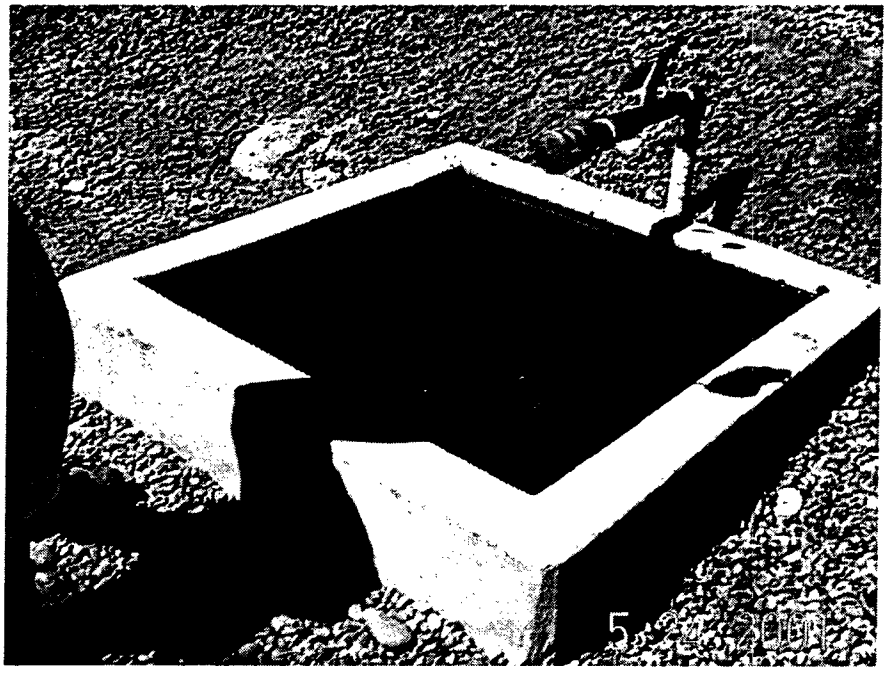

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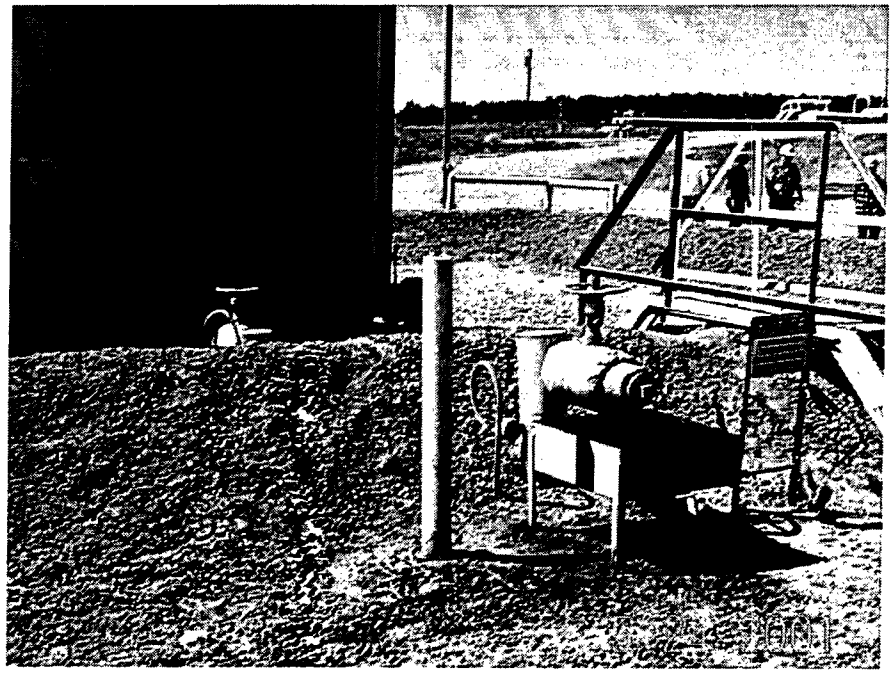
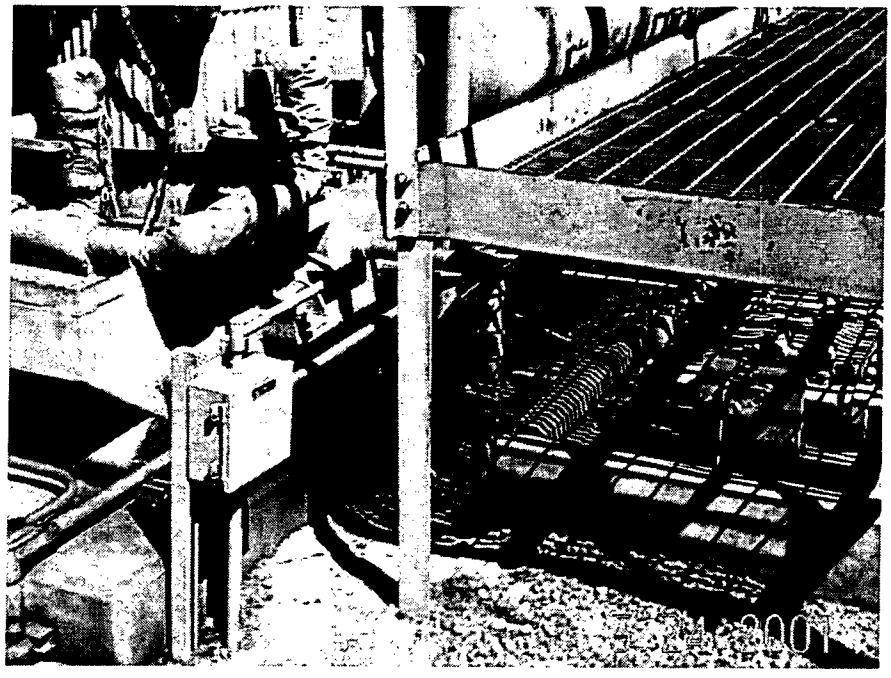
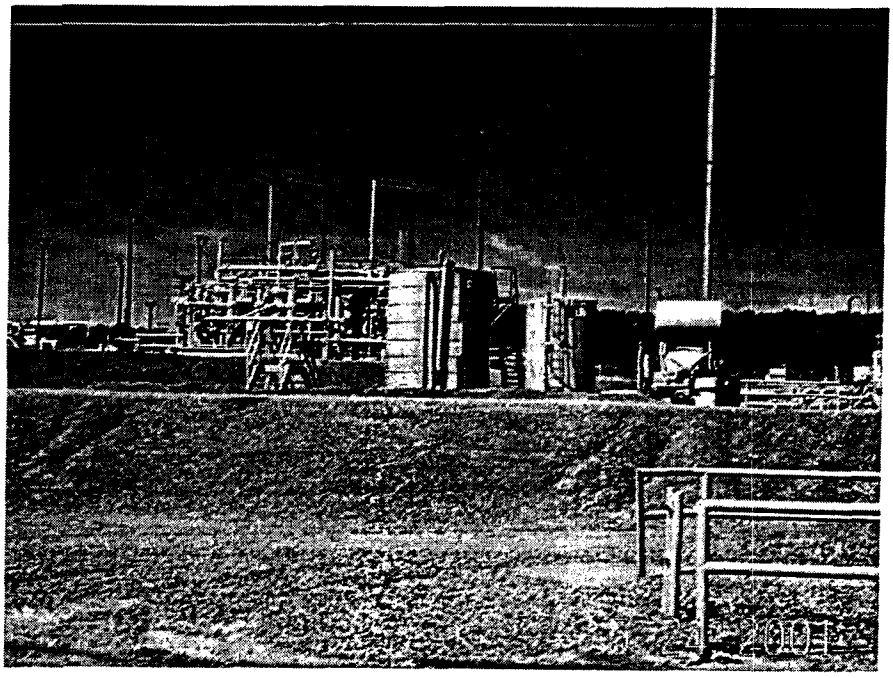
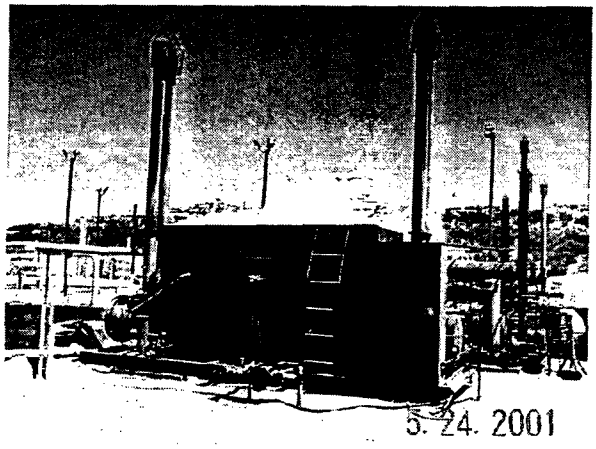


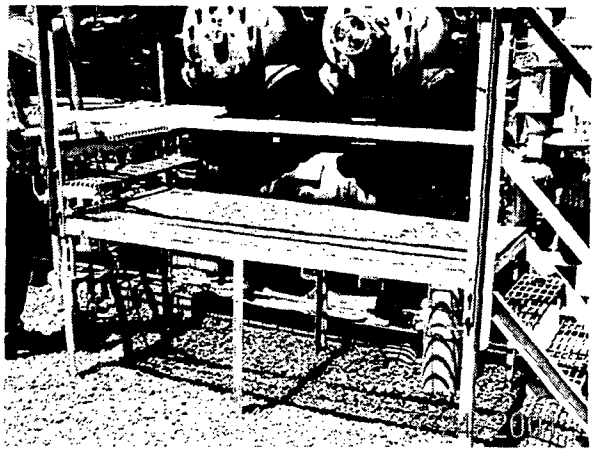


Pump Mesa Compressor Station

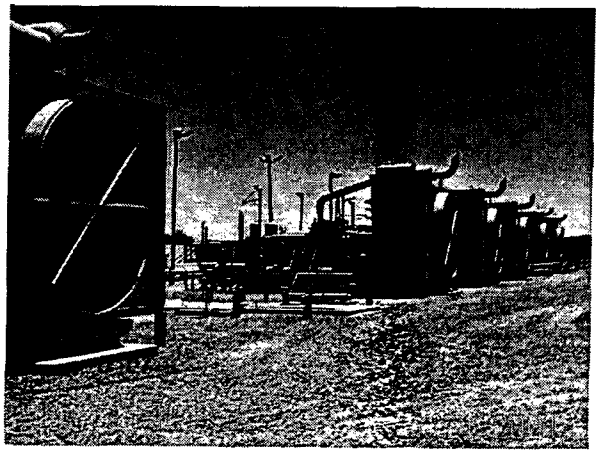


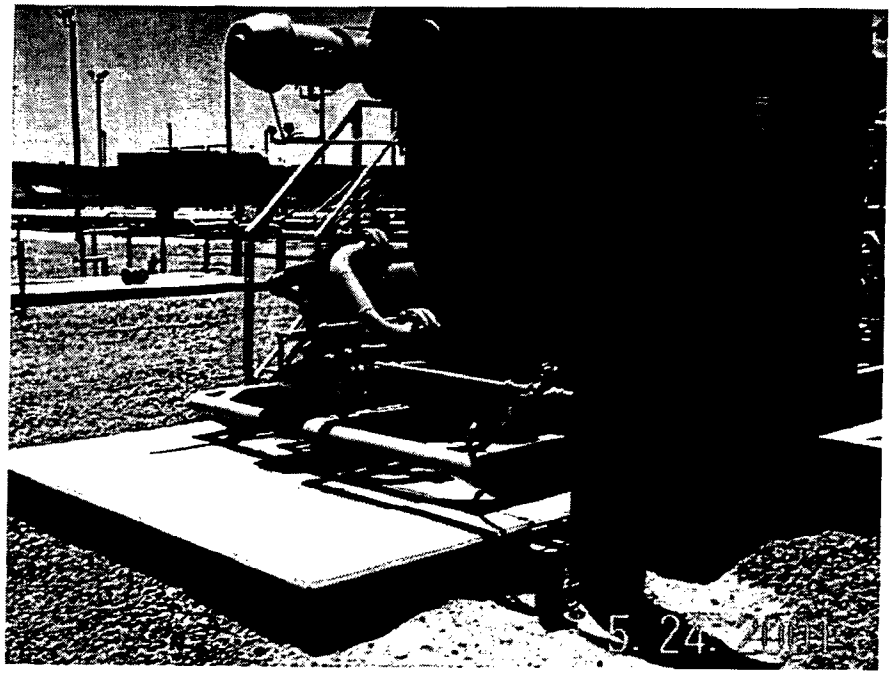
ATTACHMENT NO.4
Horse Canyon Compressor Station



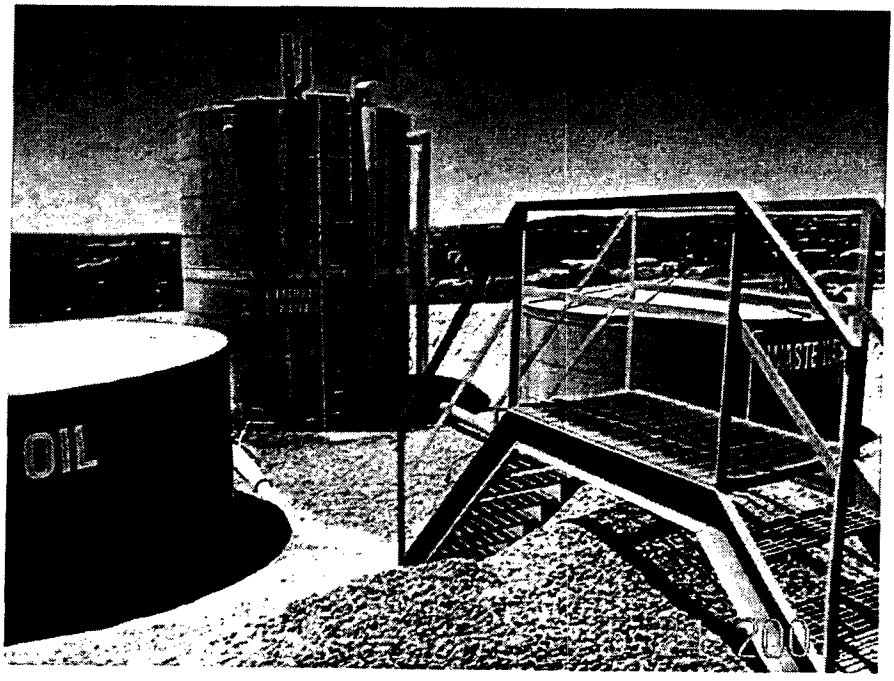


Horse Canyon
Compressor Station





Horse Canyon Compressor Station



THE SANTA FE
NEW MEXICAN
Founded 1849

NEW MEXICO OIL CONSERVATION DIVISION
ATTN: ED MARTIN
2040 S. PACHECO
SANTA FE, NM 87505

AD NUMBER: 206804 ACCOUNT: 56689
LEGAL NO: 69265 P.O.#: 01199000033
182 LINES 1 time(s) at $ 80.23
AFFIDAVITS: 5.25
TAX: 5.34
TOTAL: 90.82

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE
I, M M Weideman being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #69265 a copy of which is hereto attached was published in said newspaper 1 day(s) between 05/18/2001 and 05/18/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 18 day of May, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ M M Weideman
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 18 day of ~~May~~ A.D., ~~2001~~

Notary Laura E. Harding

Commission Expires 11/23/03

NOTICE OF PUBLICATION

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

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

(GW-198) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their 29-6 #3 Compressor Station located in the NW/4 NE/4, Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. All effluents generated on site are collected in containment vessels prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 300 to 500 feet with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 8th day of March, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director
Legal #69265
Pub. May 18, 2001

Ford, Jack

From: Martin, Ed
Sent: Monday, May 14, 2001 8:51 AM
To: 'Santa Fe New Mexican'
Cc: Ford, Jack; Olson, William
Subject: Legal Notices

Attn: Betsy Perner

Please publish the attached notices one time only immediately upon receipt of this request.
Upon completion of publication, please send the following to this office:

1. Publisher's affidavit
2. Invoice. Our purchase order number is **01199000033**

Please publish the notice no later than Friday, May 18, 2001.

Thank you.

Publ. Notice GW-326 Publ. Notice GW-245 Publ. Notice GW-198 Publ. Notice GW-078 Publ. Notice GW-060,062,087

Ford, Jack

[redacted]

From: Martin, Ed

Sent: Monday, March 12, 2001 4:31 PM

To: 'Rio Grande Sun'

Cc: Ford, Jack

Subject: Legal Notices

Attn: Dolores

Please publish the attached notice one time only immediately on receipt of this request.

Upon publication, please send the following to this office:

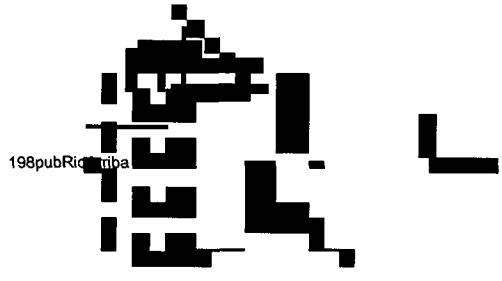
Publisher's affidavit

Your invoice to us

Our P.O. Number is: 01199000035

If you have any questions, do not hesitate to contact me.

Thank you.



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)

Filing Fee Paid Gas - 198

☐ New ☑ Renewal ☐ Modification

1. Type: Compressor Station (29-6 #3 CDP Compressor Station)
2. Operator: Williams Field Services Company

   Address: 188 CR 4900, Bloomfield, New Mexico 87413

   Contact Person: Mark J. Bareta Phone: (505) 632-4634

3. Location: NW/4 NE/4 Section 14 Township 29 North Range 6 West

   Submit large scale topographic map showing exact location.

Rio Arriba

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: Mark J. Bareta Title: Senior Environmental Specialist

    Signature: _____ Date: 04/04/2001

DISCHARGE PLAN

WILLIAMS GATHERING SYSTEM
29-6 #3 CDP COMPRESSOR STATION

Williams Field Services Company

February 2001

Table of Contents

List of Tables

List of Figures - All figures follow Section XI

List of Appendices

I. TYPE OF OPERATION

The 29-6 #3 CDP Compressor Station was built in 1995 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Milagro Plant.

II. LEGALLY RESPONSIBLE PARTY

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

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

III. LOCATION OF FACILITY

The 29-6 #3 CDP Compressor Station is located in Section 14, Township 29 North, Range 6 West, in Rio Arriba County, New Mexico, approximately 3.5 miles north-northwest of Gobernador, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangle: Four Mile Canyon, 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 (WFS) is leasing the subject property from:

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

V. FACILITY DESCRIPTION

1129 hp

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation of one 1,129-hp engine. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

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.

Used oil filters have been collected from representative WFS compressor stations and analyzed for TCLP Metals. The results of the analysis found that the filters did not exceed TCLP concentrations

for metals. The analyses were submitted to the approved disposal facility along with the Waste Acceptance Profiles. These profiles are updated every two years or as required by the disposal facility.

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

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1000–2000 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Wash-down Water	Compressor Skid	1000-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Used Process Filters	Inlet and Fuel Gas	75- 100/year	No additives
Empty Drums / Containers	Liquid Containers	20-40/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
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, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant.

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.

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. The table also includes information regarding the type of container in which the waste stream will be stored, container capacity, and containment/spill prevention provisions.

TABLE 2
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
29-6 #3 CDP COMPRESSOR STATION

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above ground storage tank	500 gallons	Berm	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	Drum 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.
Wash-down Water	Below-ground sump, vaulted	740 gallons	Dual-walled tank	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.
Used Process Filters	Drum 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.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed
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 Absorbents	Drum 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.
Compressor Oil	Above ground storage tank	500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol	Above ground storage tanks	150 gallons (on dehydrator skid)	Skid	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

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

Best Management Practices

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

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

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

IX. INSPECTION, MAINTENANCE AND REPORTING

WFS's personnel will operate and maintain the compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through Gas Dispatch. The facility will be visited several times per week at a minimum, and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

In the event of a release of a reportable quantity, the operator reports the release to WFS Gas Control who immediately notifies the WFS Environmental Affairs Department. WFS Environmental Affairs then reports the release to the 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 and will be equipped with an impermeable liner. 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 29-6 #3 CDP Compressor Station is located approximately 3.5 miles north-northwest of Gobernador, New Mexico. The site elevation is approximately 6,783 feet above mean sea level. The natural ground surface topography slopes downward toward the southeast. The maximum relief over the site is approximately 10 feet.

Intermittent flow from the site will follow the unnamed drainage towards the southwest. The drainage flows to approximately 3.6 miles to Gobernador Canyon Wash. Gobernador Canyon Wash flows into the San Juan River approximately 16.5 miles west of the site. The San Juan River, at approximately 5,650 feet in elevation, is the nearest down-gradient perennial source of surface water to the site.

A review of the available hydrologic data[1,2,3] for this area revealed that there are no water wells within a 1/4-mile radius of 29-6 #3 CDP Compressor Station. The water-bearing unit in this area is the San Jose Formation. The San Jose Formation is the youngest Tertiary bedrock unit. This formation consists of a sequence of interbedded sandstone and mudstone. Ground water depth at the site is estimated to be 300 to 500 feet below the surface. The total dissolved solids concentration of area ground water ranges from 200 to 1000 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]Records of Water Wells in San Juan County, 1978-1983.

[3]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.

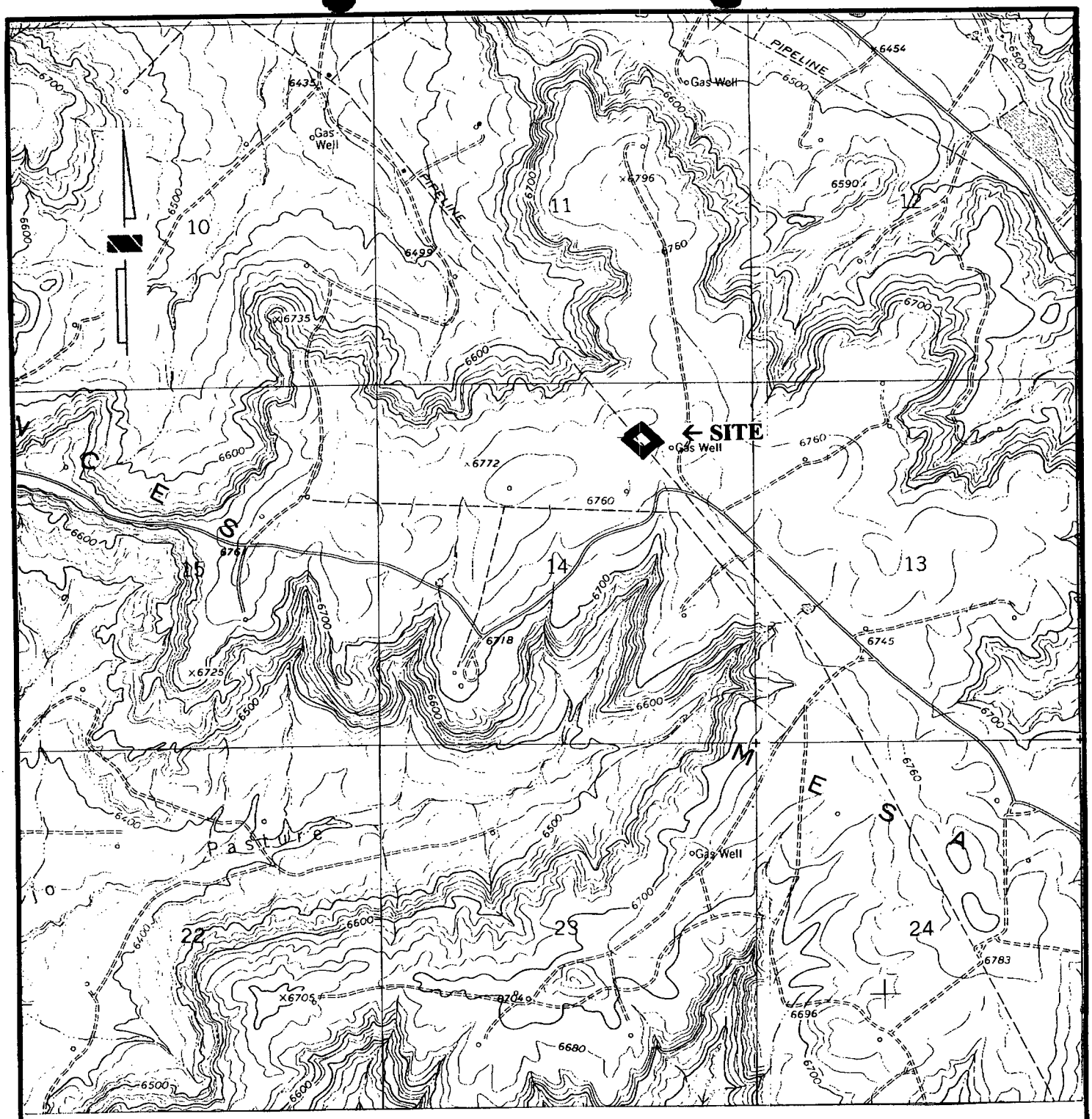
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLOT PLAN



Source:USGS Four Mile Canyon Quadrangle, New Mexico

Scale: 1" = 2,000'

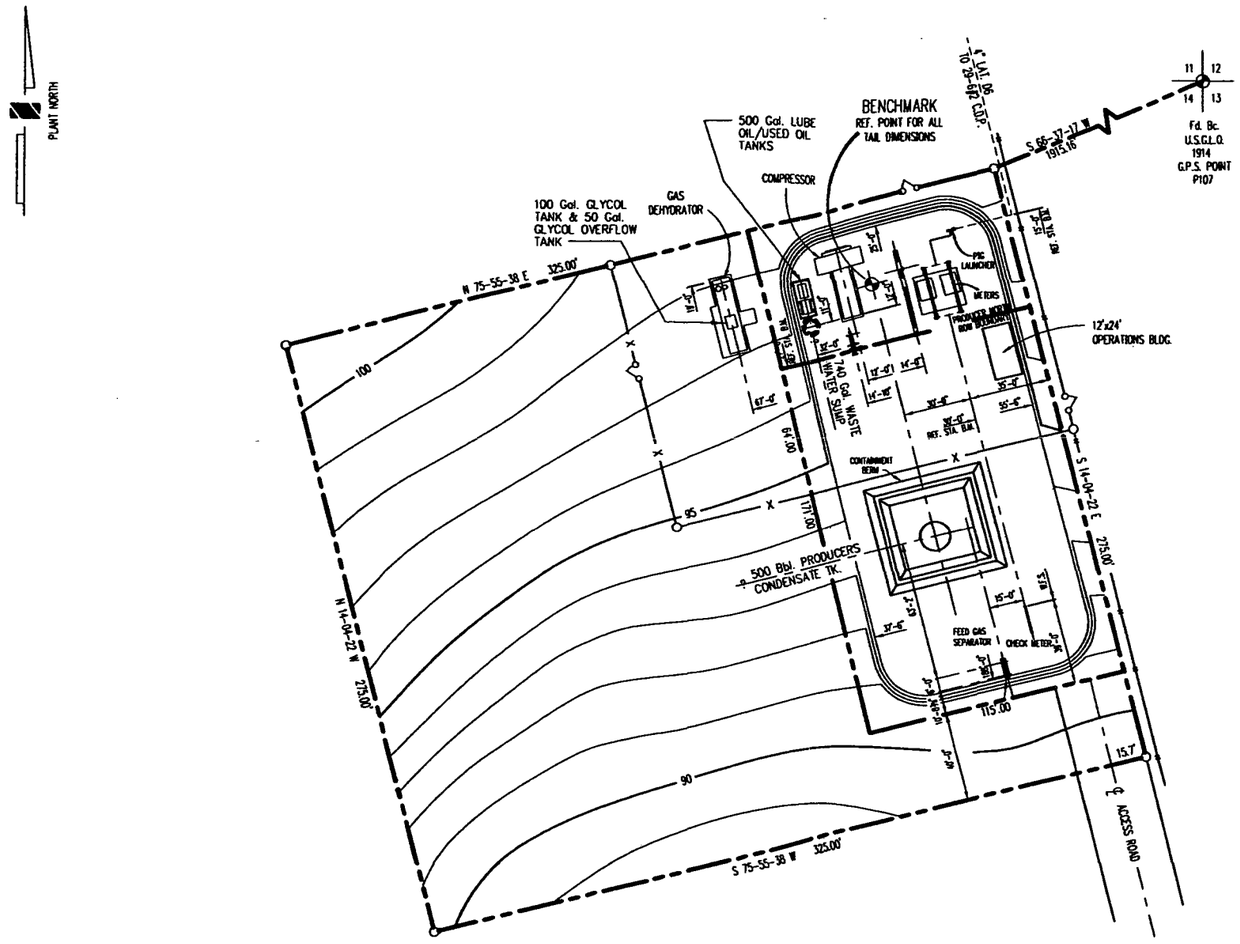
Figure 1 Site Vicinity / Topographic Map

29-6 #3 CDP Compressor Station

Section 14, Township 29N Range 6W

Rio Arriba County, New Mexico

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS



REFERENCE DRAWINGS				REFERENCE DRAWINGS				REVISIONS															
DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE	NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK.	APP.
															02	1-22-99	PWM	REVISED PER FIELD AS-BUILT	98408		
															01	10-21-98	PWM	ISSUED PER AS-BUILT	98408		

DRAFTING	BY	DATE
DRAWN BY	PWM	10-21-98
CHECKED BY		
APPROVED BY		
ENGINEER	**BY**	**DATE**
DESIGNED BY		
PROJ. APPROVED		

STATE: NEW MEXICO
COUNTY: RIO ARRIBA

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

29-6 #3 C.D.P. COMPRESSOR STATION
SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN
PLOT PLAN

SCALE: 1" = 30'
W.O. NO. 98408
DWG NO. 29-6 #3-1-P5
SHEET 1 OF 1
REV 02

S:\WFSDS\PM_EI\29-6-3\Eod\00050102.dwg Mon Mar 08 08:26:03 1999

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
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

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

Ford, Jack

From: Martin, Ed
Sent: Monday, March 12, 2001 3:31 PM
To: 'Rio Grande Sun'
Cc: Ford, Jack
Subject: Legal Notices

Attn: Dolores

Please publish the attached notice one time only immediately on receipt of this request.

Upon publication, please send the following to this office:
Publisher's affidavit
Your invoice to us
Our P.O. Number is: 01199000035

If you have any questions, do not hesitate to contact me.
Thank you.

198pubRioArriba

NOTICE OF PUBLICATION

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

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

(GW-198) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their 29-6 #3 Compressor Station located in the NW/4 NE/4, Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. All effluents generated on site are collected in containment vessels prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 300 to 500 feet with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 8th day of March, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 8th day of March, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

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

March 6, 2001

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

Re: Discharge Plan Application and Filing Fee for WFS Compressor Stations

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application and check number 1000250646 for $200.00 to cover the filling fee for the following Williams Field Services (WFS) Compressor Stations:

- 29-6 #3 Compressor Station
- Hare Compressor Station

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

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. [redacted] dated 3/5/01,

or cash received on _____ in the amount of $ 200.00

from Williams Field Services

for 29-6 #3 C.S. - GW-198 Hare C.S. - GW-343

Submitted by: (Facility Name) _____ Date: (OP No.) 3/8/01

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee V New Facility ___ Renewal ___

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment V 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
1800 South Baltimore Avenue * P.O. Box 645 * Tulsa, OK 74101-0645

70-2322/719
A/C 9401076

[redacted]

DATE: 03/05/2001

PAY TO THE ORDER OF:

PAY ********$200.00

NEW MEXICO OIL CONSERVATION DI
NM WATER QUALITY MGMT FUND
2040 S PACHECO

SANTA FE NM 87504
United States

Bank One, NA
Illinois

Authorized Signer

MA1353 (10/99)

COPYBAN- ANTI-FRAUD PROTECTION - PATENTS 4,210,346 ; 4,227,720 ; 4,310,180 ; 5,197,765 ; 5,340,159

[redacted]

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
01-MAR-01	20010301	0008803-FCA030107010	DISCHARGE PLAN APPLICATION AND FILING FEE	200.00

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
[redacted]	03/05/2001	40665	NEW MEXICO OIL CONSERVATION DI	$200.00

MA1353(WESAP001) (AP)

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 (29-6 #3 Compressor Station)
2. Operator: Williams Field Services Company

   Address: 188 CR 4900, Bloomfield, NM 87413

   Contact Person: Mark J. Bareta Phone: (505) 632-4634
3. Location: NW /4 NE /4 Section 14 Township 29N Range 6W
   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: Mark J. Bareta Title: Senior Environmental Specialist

Signature: Mark J. Bareta Date: 3/2/2001

DISCHARGE PLAN

WILLIAMS GATHERING SYSTEM
29-6 #3 CDP COMPRESSOR STATION

Williams Field Services Company

February 2001

Table of Contents

List of Tables

List of Figures - All figures follow Section XI

List of Appendices

I. TYPE OF OPERATION

The 29-6 #3 CDP Compressor Station was built in 1995 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Milagro Plant.

II. LEGALLY RESPONSIBLE PARTY

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

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

III. LOCATION OF FACILITY

The 29-6 #3 CDP Compressor Station is located in Section 14, Township 29 North, Range 6 West, in Rio Arriba County, New Mexico, approximately 3.5 miles north-northwest of Gobernador, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangle: Four Mile Canyon, 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 (WFS) is leasing the subject property from:

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

V. FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation of one 1,129-hp engine. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

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.

Used oil filters have been collected from representative WFS compressor stations and analyzed for TCLP Metals. The results of the analysis found that the filters did not exceed TCLP concentrations

for metals. The analyses were submitted to the approved disposal facility along with the Waste Acceptance Profiles. These profiles are updated every two years or as required by the disposal facility.

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

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1000–2000 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Wash-down Water	Compressor Skid	1000-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Used Process Filters	Inlet and Fuel Gas	75- 100/year	No additives
Empty Drums / Containers	Liquid Containers	20-40/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
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, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant.

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.

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. The table also includes information regarding the type of container in which the waste stream will be stored, container capacity, and containment/spill prevention provisions.

TABLE 2
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
29-6 #3 CDP COMPRESSOR STATION

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above ground storage tank	500 gallons	Berm	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	Drum 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.
Wash-down Water	Below-ground sump, vaulted	740 gallons	Dual-walled tank	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.
Used Process Filters	Drum 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.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed
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 Absorbents	Drum 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.
Compressor Oil	Above ground storage tank	500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol	Above ground storage tanks	150 gallons (on dehydrator skid)	Skid	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

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

Best Management Practices

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

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

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

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

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

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

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

IX. INSPECTION, MAINTENANCE AND REPORTING

WFS's personnel will operate and maintain the compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through Gas Dispatch. The facility will be visited several times per week at a minimum, and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

In the event of a release of a reportable quantity, the operator reports the release to WFS Gas Control who immediately notifies the WFS Environmental Affairs Department. WFS Environmental Affairs then reports the release to the 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 and will be equipped with an impermeable liner. 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 29-6 #3 CDP Compressor Station is located approximately 3.5 miles north-northwest of Gobernador, New Mexico. The site elevation is approximately 6,783 feet above mean sea level. The natural ground surface topography slopes downward toward the southeast. The maximum relief over the site is approximately 10 feet.

Intermittent flow from the site will follow the unnamed drainage towards the southwest. The drainage flows to approximately 3.6 miles to Gobernador Canyon Wash. Gobernador Canyon Wash flows into the San Juan River approximately 16.5 miles west of the site. The San Juan River, at approximately 5,650 feet in elevation, is the nearest down-gradient perennial source of surface water to the site.

A review of the available hydrologic data[1,2,3] for this area revealed that there are no water wells within a 1/4-mile radius of 29-6 #3 CDP Compressor Station. The water-bearing unit in this area is the San Jose Formation. The San Jose Formation is the youngest Tertiary bedrock unit. This formation consists of a sequence of interbedded sandstone and mudstone. Ground water depth at the site is estimated to be 300 to 500 feet below the surface. The total dissolved solids concentration of area ground water ranges from 200 to 1000 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]Records of Water Wells in San Juan County, 1978-1983.

[3]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.

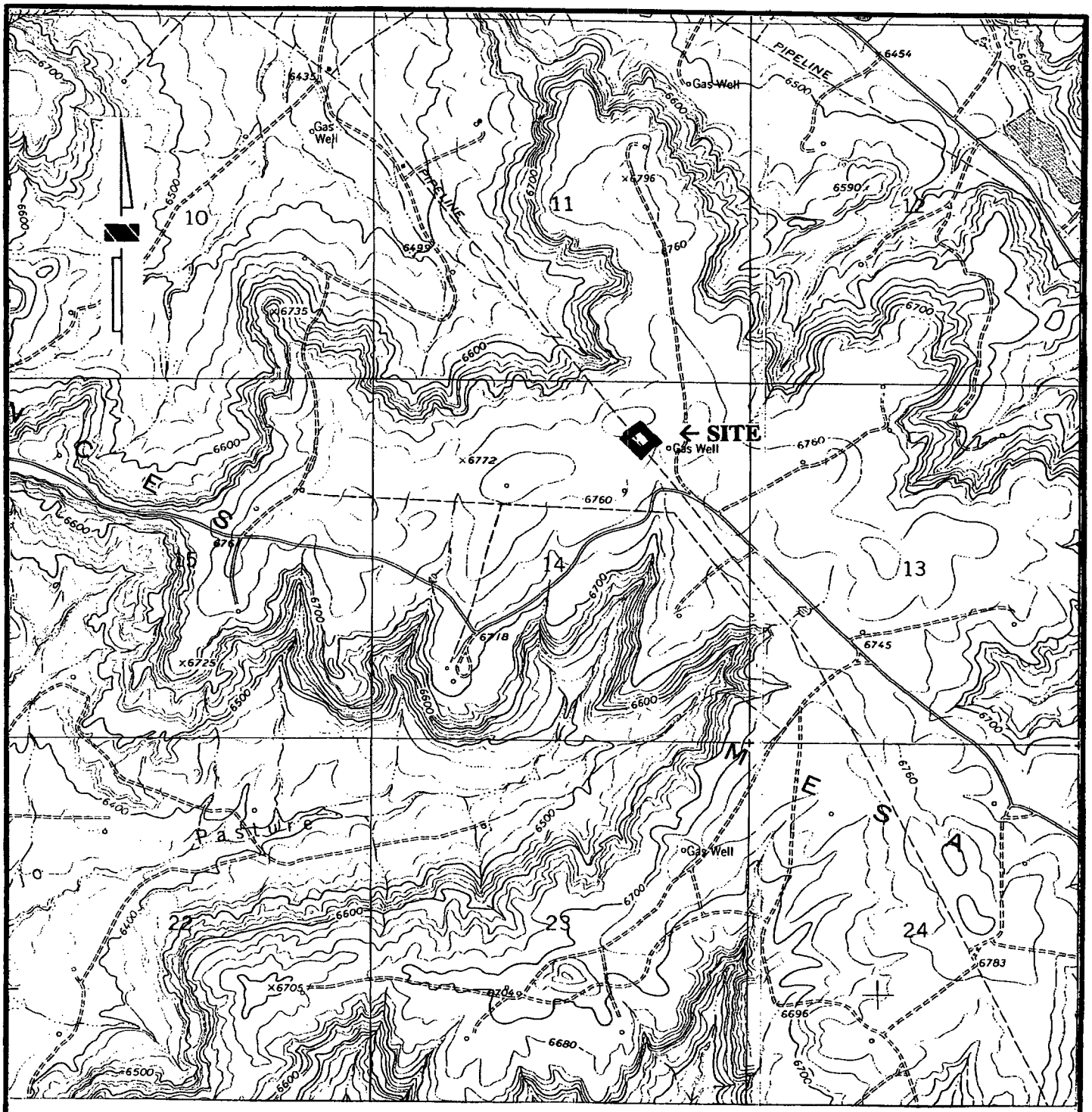
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLOT PLAN



Source:USGS Four Mile Canyon Quadrangle, New Mexico

Scale: 1" = 2,000'

Williams

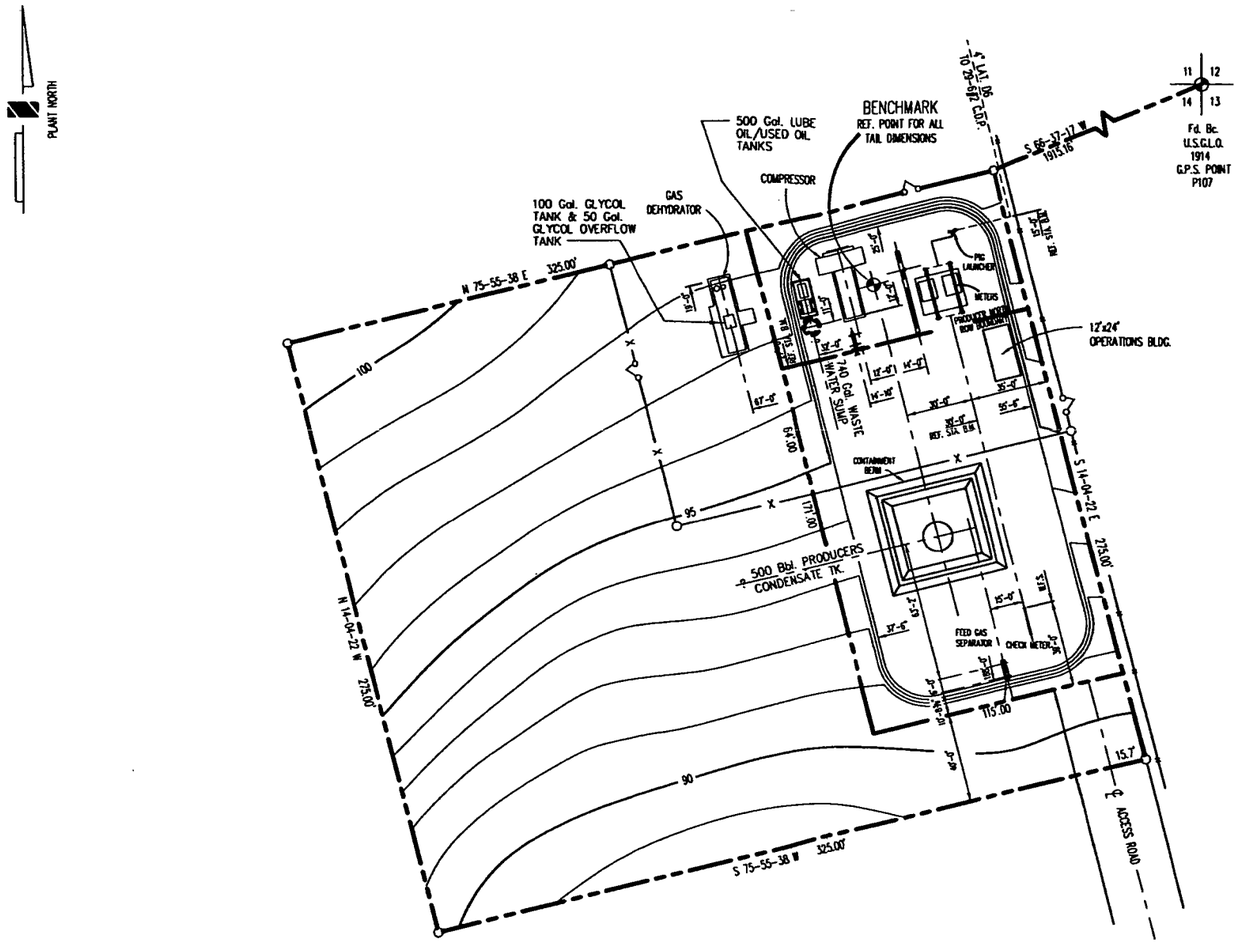
Figure 1 Site Vicinity / Topographic Map

29-6 #3 CDP Compressor Station

Section 14, Township 29N Range 6W

Rio Arriba County, New Mexico

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS



REFERENCE DRAWINGS				REFERENCE DRAWINGS			
DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE

REVISIONS													
NO.	DATE	BY	DESCRIPTION	V.O.NO.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	V.O.NO.	CHK.	APP.
							02	1-22-99	PHUL	REVISED PER FIELD AS-BUILT	98408		
							01	10-21-98	PHUL	ISSUED PER AS-BUILT	98408		

DRAFTING	BY	DATE
DRAWN BY	PHUL	10-21-98
CHECKED BY		
APPROVED BY		
ENGINEER	**BY**	**DATE**
DESIGNED BY		
PROJ. APPROVED		

STATE: NEW MEXICO
COUNTY: RIO ARRIBA

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

29-6 #3 C.D.P. COMPRESSOR STATION
SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN
PLOT PLAN

SCALE: 1" = 30'
V.O. NO. 98408
DWG NO. 29-6 #3-1-P5
SHEET 1 OF 1
REV 02

S:\WFSDS\PM_EI\29-6-3\Eod\00050102.dwg Mon Mar 08 08:26:03 1999

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
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

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

Work Copy

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

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES, INC.

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

November 26, 1996

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

RE: Replacement of Fiberglass Wastewater Sumps

Dear Mr. Sanchez:

This letter is to provide notification of the removal and replacement of fiberglass sumps at the following Williams Field Services locations:

29-6#3 CDP:	December 2-6
29-7 CDP:	December 9-13
Navajo CDP:	December 18-22

This schedule is subject to change dependent on weather and road conditions. If you have any questions or need additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Leigh E. Gooding
Sr. Environmental Specialist

cc: Mr. Denny Foust

DEC 03 1996

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

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES, INC.

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

October 1, 1996

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

Dear Mr. LeMay:

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

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

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

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

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

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

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

Sincerely,

Leigh E. Gooding
Sr. Environmental Specialist

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

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

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

September 25, 1996

Rose

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

RECEIVED
SEP 3 0 1996
Environmental Bureau
Oil Conservation Division

Dear Mr. LeMay:

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

Talked to Leigh Gooding on Monday 9-30-96 Let him know that letter not signed and 29-6#3 should be GW-196 Ms. Gooding said she will mail the rev'd & revised letter JLG

29-6 #3 CDP (GW-196)
29-7 CDP (GW-136)
La Cosa CDP (GW-187)
Navajo CDP (GW-182)

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

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

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

Sincerely,

Leigh E. Gooding
Sr. Environmental Specialist

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

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

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

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

August 3, 1995

Mr. Chris Eustice
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Re: Washdown Waste Water Analysis Required for Discharge Plan for 29-6 #3 CDP, Rio Arriba County, New Mexico.

Dear Mr. Eustice:

Per your request, I have enclosed a copy of the analytical results of a representative washdown waste water sample collected from WFS's Cedar Hill CDP on July 19, 1995. The sample was analyzed for eight RCRA metals, pH, TDS, TOX, BTEX, and TPH.

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

Sincerely,

Leigh E. Gooding
Environmental Specialist

enclosure

cc: Denny Foust, OCD District III Office (letter and enclosure)

INORGANIC ANALYSIS REPORT

AMERICAN WEST ANALYTICAL LABORATORIES

463 West 3600 South
Salt Lake City, Utah
84115

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

Client: Williams Field Service
Date Sampled: July 19, 1995
Lab Sample ID.: 23218-08
Field Sample ID: San Juan Area/Cedar Hill #1

Contact: Mark Harvey
Date Received: July 20, 1995
Received By: Laurie Hastings
Set Description: One Water and Seven Soil Samples

Analytical Results

	Method Used:	Detection Limit: mg/L	Amount Detected: mg/L
TOTAL METALS			
Arsenic	7060	0.005	<0.005
Barium	6010	0.002	**2.8**
Cadmium	6010	0.004	**0.013**
Chromium	6010	0.01	**0.03**
Lead	6010	0.05	**0.13**
Mercury	7471	0.001	<0.001
Selenium	7740	0.005	<0.005
Silver	6010	0.01	<0.01
OTHER CHEMISTRIES			
pH	150.1	0.1	**6.8**
TDS	160.1	1.0	**3,600.**
TOX	9020	0.5	**1.6**

Released by: _____
Laboratory Supervisor

Report Date 8/2/95

ORGANIC ANALYSIS REPORT

AMERICAN WEST ANALYTICAL LABORATORIES

463 West 3600 South
Salt Lake City, Utah
84115

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

Client: Williams Field Services
Date Sampled: July 19,1995
Date Received: July 20,1995

Contact: Mark Harvey
Date Analyzed: July 26,1995

Analysis Requested:
Volatile Aromatics
Total Purgeable Hydrocarbons

Method Ref.Number:
SW-846 #8260
(Purge & Trap GC/MS)

Field Sample ID:
SAN JUAN AREA
CEDAR HILL #1

Lab Sample ID:
L23218-8

Analytical Results

BTX/TPH-P

Units = mg/L(ppm)

Compound:	Detection Limit:	Amount Detected:
Benzene	0.020	**0.036**
Toluene	0.020	**0.046**
Ethylbenzene	0.020	**0.14**
Total Xylene	0.020	**0.95**
Total Purgeable Hydrocarbons	0.20	**19.**

< Value = None detected above the specified detection limit, or a value that reflects a reasonable limit due to interferences.

Released By: John Yunker
Laboratory Supervisor

Report Date: July 31,1995

8-3-95

WDS 29-6 #3

Brand new facility
not yet running
from water collects to
a below grade tank.
has a leak detector
no produced water

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

DIVISION

32

July 17, 1995

Mr. Chris Eustice
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Re: Additional Information for 29-6 #3 CDP Compressor Station Discharge Plan - Rio Arriba County

Dear Mr. Eustice:

In response to your request for additional information concerning the above referenced Discharge Plan, Williams Field Services (WFS) submits the following response:

1. Representative washdown waste water and waste oil samples were collected approximately three years ago from WFS's Cedar Hill CDP Compressor Station. The purpose of the test was to characterize the washdown water and used oil for disposal. The results are enclosed for your review. WFS has arranged to collect washdown water samples from Cedar Hill the week of July 17, 1995 in order to provide a current waste analysis for all WFS Manzanares sites. The results will be forwarded to New Mexico Oil Conservation Division (NMOCD) upon receipt.

2. A description of the below-grade waste water tank was submitted to NMOCD on June 12, 1995. This description is accurate with the exception of the submersible pump. WFS engineering has opted to omit the submersible pump from the tank design. Instead, waste water accumulations will be removed from the inner tank using a vacuum truck. The only other storage tank on site will be a 500-gallon lube oil tank adjacent to the compressor. The tank will be constructed of steel and be mounted on stilts.

3. The only waste stream to be generated at the site which is not included in Table 1 is used oil filters. The filters are stored in 55-gallon drums on site and disposed of at the San Juan County Landfill. A current waste profile is on file with the landfill. All antifreeze is consumed in the process.

4. Produced water from the gas inlet separator will be collected separately in the Producers on-site, above-ground storage tank and disposed at an OCD-approved Class II injection well. Washdown waste water will be collected in the below-grade tank and disposed of at an OCD approved surface disposal facility.

5. Washdown water has been shown to be non-hazardous and as such, will be disposed at an OCD-approved surface disposal facility. This method of disposal was approved by NMODC in the discharge plan approval for WFS's La Cosa Compressor Station dated June 6, 1995 (GW-187).

6. The contents of the tank(s) on saddle rack(s) is lube oil. The volume is 500 gallons. WFS normally employs one 500-gallon lube oil tank per compressor engine.

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

Sincerely,

Leigh E. Gooding, P.G.
Environmental Specialist

enclosure

cc: Denny Foust, OCD District III Office

OIL CONSERVATION DIVISION

July 7, 1995

CERTIFIED MAIL
RETURN RECEIPT NO.P-176-012-158

Ms. Leigh Gooding
Williams Field Services, Inc.
P.O. Box 58900
Salt Lake City, Utah 84158-0900

RE: Discharge Plan GW-198
29-6 #3 C.D.P. Compressor Station
Rio Arriba County, New Mexico

Dear Ms. Gooding:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the discharge plan application dated May, 1995 for the above-referenced facility. The following comments and requests for additional information are based upon the OCD's review of the application.

1. Section 2.1 of the discharge plan states representative samples of washdown waste water has been collected and analyzed. Provide the OCD with a copy of these analytical results for the file.

2. Provide a description of the storage tanks used to collect the waste fluids.

3. Table 1 of the discharge plan lists the various waste streams to be generated. Is this a comprehensive listing of all anticipated waste (i.e. filter waste, oily debris, antifreeze, etc)? If not, provide a comprehensive listing of all wastes and how they are generated, transferred, stored and disposed of.

4. Section 2.3 of the discharge plan details the disposal of waste streams. Is the washdown water and the produced water from the gas inlet separator commingled? If so, propose a method of segregation and describe how the washdown water will be disposed of. The OCD has determined that washdown water from a compressor facility is non-exempt, therefore, the water cannot be disposed of down a Class II disposal well.

5. Section 2.3 of the discharge plan states the washdown water will be disposed of at an OCD approved facility. What kind of disposal method does this OCD approved facility employ?

6. What is the contents and volumes of the saddle tanks mentioned in section 2.2 of the discharge plan?

Submission of the above requested information will allow the review process to continue. If you have any questions please call me at (505) 827-7153.

If you have any questions, please don't hesitate to call me at (505) 827-7153.

Sincerely,

Chris Eustice
Environmental Geologist

xc: Denny Foust, OCD Aztec 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

OIL CONSERVATION DIVISION
RECEIVED
'95 JUN 15 AM 8 52

June 12, 1995

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

Re: Update for Discharge Plan for 29-6 #3 CDP Compressor Station - Rio Arriba County

Dear Mr. Anderson:

This letter will serve to update the Williams Field Services' (WFS's) Discharge Plan for 29-6 #3 CDP Compressor Station located in Rio Arriba County, New Mexico. The plan was submitted to OCD for approval on May 15, 1995. Since that time, WFS has decided to install a below-grade waste water sump at the subject site. The sump will be constructed in accordance with OCD Guidelines for the Selection and Installation of Below-Grade Produced Water Tanks (revised 10/91).

Waste water will gravity-drain from concrete containment skids below compressor units and lube oil day tanks to the sump. The sump will consist of a six foot diameter, 740-gallon fiberglass tank set within an eight foot diameter fiberglass tank. A submersible pump equipped with a float control will be placed in the inner tank through a thirty-inch well. Any waste water accumulations will be pumped from the inner tank to an above-ground holding tank. An eight-inch inspection port will be installed within the outer tank for visual inspection. A schematic drawing of the sump is attached.

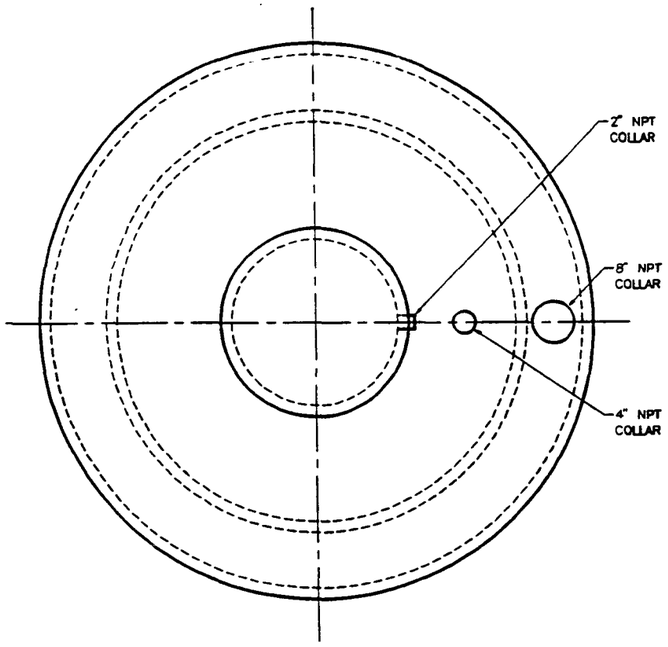
If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

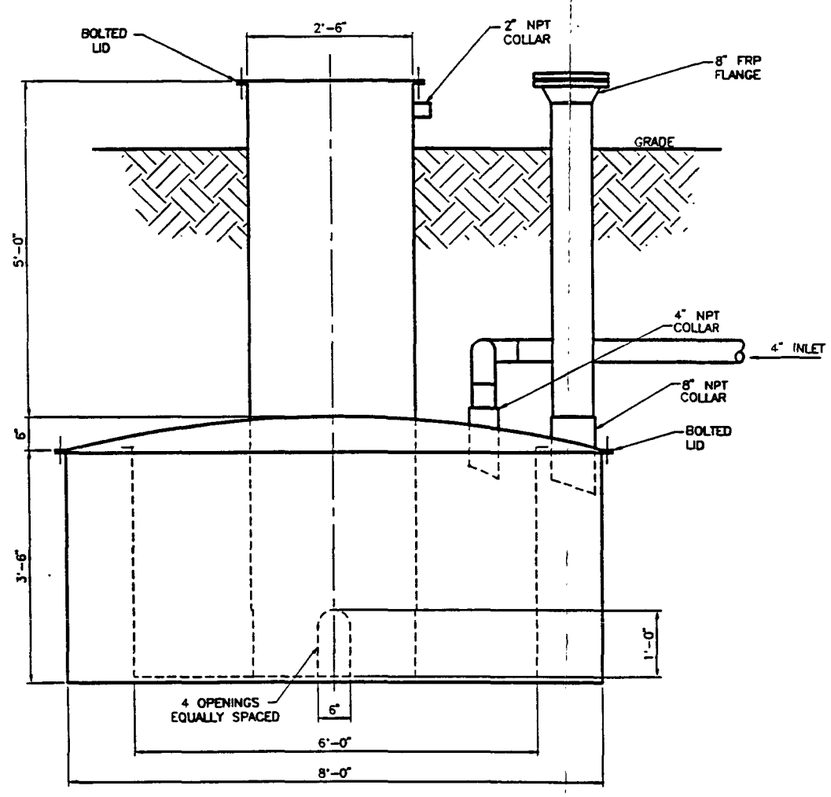
Leigh E. Gooding, P.G.
Environmental Specialist

enclosure

cc: Denny Foust, OCD District III Office (letter and enclosure)



WASTE WATER SUMP
PLAN VIEW



WASTE WATER SUMP
ELEVATION

PRELIMINARY

LEGEND	REFERENCE DRAWINGS				REVISIONS																
	DRAWING NO.	TITLE	DRAWING NO.	TITLE	NO.	DATE	BY	DESCRIPTION	V.O.NO.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	V.O.NO.	CHK.	APP.

DRAFTING	BY	DATE
DRAWN	R.B	03/02/95
CHECKED		
APPROVED		
ENGINEERING	BY	DATE
PROJ. APPROVED		

WILLIAMS GAS PROCESSING
ONE OF THE WILLIAMS COMPANIES

GATHERING SYSTEM STANDARD
FIBERGLASS WATER SUMP

SCALE: 1"=1" | W.O. NO. 11807 | DWG. NO. STD-D-1-4042 | REV.

NOTICE OF PUBLICATION

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

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

(GW-198) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their 29-6 #3 compressor station located in the NW/4 NE/4, Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 2 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 303 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 22nd day of May, 1995.

NO EFFECT FINDING

The described action will have no effect on listed species, wetlands, or other important wildlife resources.

Date May 30, 1995

Consultation # GW95OCD1

SEAL

Approved by

U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

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

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

(GW-198) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their 29-6 #3 compressor station located in the NW/4 NE/4, Section 14, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 2 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 303 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan address how spill, leaks, and other accidental discharges to the surface will be managed.

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

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

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CA - Classified Advertising DA - Display Advertising SS - Stock

STATE OF NEW MEXICO
County of Rio Arriba } ss.

I, Robert Trapp, being first duly sworn, declare and say that I am the Publisher of the Rio Grande Sun, a weekly newspaper, published in the English language, and having a general circulation in the City of Espanola and County of Rio Arriba, State of New Mexico, and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 of the Session Laws of 1937; that the publication, a copy of which is hereto attached,

was published in said paper once each week for ..... consecutive weeks, and on the same day of each week in the regular issue of the paper during the time of publication, and that the notice was published in the newspaper proper, and

not in any supplement, the first publication being on the ..... day of

June 19 95 and the last publication on the ..... day

of ..... 19....; that payment for said advertisement has been (duly made), or (assessed as court costs); that the undersigned has personal knowledge of the matters and things set forth in this affidavit.

Robert Trapp
Publisher

Subscribed and sworn to before me this .....

day of June, A.D., 19 95

.....
Notary Public

My Commission expires

5-17-97

NOTICE OF PUBLICATION

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

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 22nd day of May, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

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 15, 1995

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

Re: Discharge Plan for 29-6 #3 CDP Compressor Station - Rio Arriba County

Gw) 198

Dear Mr. Foust:

Enclosed please find two copies of the Discharge Plan for Williams Field Services' 29-6 #3 CDP Compressor Station located in Rio Arriba County, New Mexico. Also enclosed, please find a check for $50.00, payable to the New Mexico Water Quality Management Fund, to cover the application fee for the above referenced project.

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

Sincerely,

Leigh E. Gooding, P.G.
Environmental Specialist

enclosure

cc: Denny Foust, OCD District III Office (letter and enclosure)

DISCHARGE PLAN

GW 175

MANZANARES GATHERING SYSTEM
29-6 #3 CDP COMPRESSOR STATION

Williams Field Services Company

May 1995

1.0 GENERAL INFORMATION

1.1 Legally Responsible Party

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

Contact Person

Ms. Leigh E. Gooding, Environmental Specialist
Phone and Address, Same as Above

1.2 Location of Discharge

The 29-6 #3 Central Delivery Point (CDP) Compressor Station will be located in the NW/4 of NE/4 of Section 14, Township 29 North, Range 6 West, in Rio Arriba County, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangle: Fourmile Canyon, New Mexico) as Figure 1. The cleared site for this Compressor Station is 2.05 acres. The site boundary survey is provided in Figure 2. The proposed facility layout is presented in Figure 3.

1.3 Type of Natural Gas Operation

The 29-6 #3 CDP Compressor Station will provide metering and compression services to various producers for the gathering of coal seam methane gas (Fruitland Coal Formation) on a contract basis for ultimate delivery through the Williams Field Services' Milagro Plant (CO_2 removal) near Bloomfield, New Mexico. The design volume for the station is 10 million standard cubic feet per day (MMSCF/D).

One (1) natural gas fired, Waukesha 7042GL lean burn reciprocating engine site rated at 1,129 horse power (hp) is currently planned for this site. The unit is skid-mounted and self contained.

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

1.4 Affirmation

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

Signature _____ Date May 9, 1995

Terry G. Spradlin

Manager, Environmental Health & Safety

2.0 GENERAL PROCESSES

2.1 Process Fluids

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

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

Additional Chemicals listed in WQCC 1-101.44 and 3-103 are not expected to be present in any process fluids or in the conventional gas transported at the 29-6 #3 CDP Compressor Station.

2.2 Spill/Leak Prevention and Housekeeping Procedures

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

Environmental Protection will be a contractual obligation as follows:

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

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

TABLE 1

Sources and Disposition of
Process Fluids

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

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

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

Williams corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix A. Significant spills and leaks will be reported to the OCD pursuant to Rule 116 using the OCD form (see Appendix B).

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

2.3 Disposal of Waste Fluids

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

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

Washdown wastewater from engine deck plates is collected in a closed piping system directly to the wastewater storage tank and disposed of at a commercial facility authorized by the OCD. Based on volumes recorded at similar facilities, approximately 50 barrels of wastewater is expected to be hauled off site each month.

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

3.0 Site Characteristics

A. Hydrologic Features

The 29-6 #3 CDP Compressor Station is located in the NW/4 of NE/4 of Section 14, Township 29 North, Range 6 West, Rio Arriba County, approximately 24 miles west of Blanco, New Mexico. The graded site elevation is approximately 6,783 feet above mean sea level. The undeveloped site is covered by sagebrush, crested wheat grass, and native grasses. The site is underlain by quaternary alluvium which has been deposited over the sandstones and shales of the Nacimiento Formation.

The site is located approximately 1.6 miles west of Frances Creek. The creek is located at an elevation of approximately 6,480 feet. Based on the elevation of the creek, the expected depth to groundwater at the subject site is 300 feet below ground surface. A review of the available hydrologic data[1] for this area revealed that the closest documented source of ground water downgradient from the subject site is the alluvial deposits of an unnamed ephemeral stream channel. The channel is located 1700 feet east of the subject site at an elevation of approximately 6,750 feet. Ground water within these alluvial deposits flows northeast toward Frances Creek and is expected to have a total dissolved solids (TDS) concentration of approximately 2,000 mg/l.

The nearest identified ground water well is owned by Porter Smith and is located in Section 21, Township 29 North, Range 6 West at an elevation of approximately 6,340 feet. The total depth of the well is 219 feet. The well is located approximately 2.5 miles southwest of the subject site.

B. Flood Protection

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

---

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

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

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

FIGURE 1

SITE LOCATION MAP

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

FOURMILE CANYON QUADRANGLE

NEW MEXICO-RIO ARRIBA CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

29-6 #3 CDP COMPRESSOR STATION

Mapped, edited, and published by the Geological Survey

Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial photographs taken 1958 and 1962. Field checked 1963

Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, central zone
1000-meter Universal Transverse Mercator grid ticks, *zone 13, shown in blue*

Fine red dashed lines indicate selected fence lines

Entire area is within the San Juan Gas Field

To place on the predicted North American Datum 1983 move the projection lines 2 meters north and 54 meters east as shown by dashed corner ticks

UTM GRID AND 1982 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

CONTOUR INTERVAL 20 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

QUADRANGLE LOCATION

Revisions shown in purple compiled from aerial photographs taken 1981 and other source data. *Partial* field check by U.S. Forest Service. Map edited 1982

ROAD CLASSIFICATION

Primary highway, hard surface — Light-duty road, hard or *improved surface*
Secondary highway, hard surface — Unimproved road
Interstate Route — U. S. Route — State Route

FOURMILE CANYON, N. MEX
N3637.5-W10722.5/7.5

1963
PHOTOREVISED 1982
DMA 4557 III NW-SERIES V881

FIGURE 2

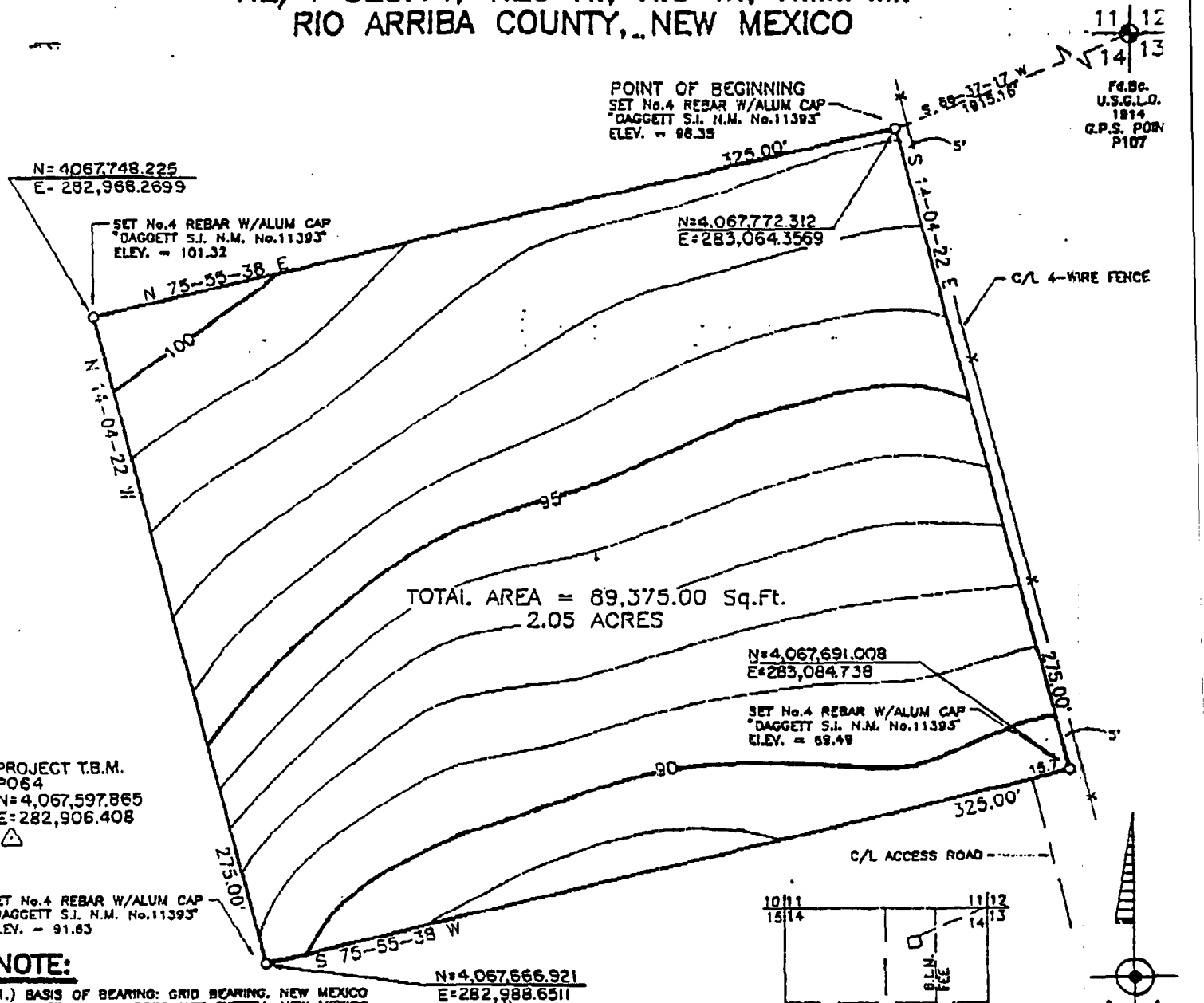
SITE SURVEY PLAN

A BOUNDARY SURVEY FOR

WILLIAMS FIELD SERVICES

SAN JUAN 29-6 No.3 C.D.P. ALTERNATE

NE/4 SEC.14, T.29 N., R.6 W., N.M.P.M.
RIO ARRIBA COUNTY, NEW MEXICO



NOTE:

1.) BASIS OF BEARING: GRID BEARING, NEW MEXICO STATE PLANE COORDINATE SYSTEM, NEW MEXICO WEST ZONE. BEARING BETWEEN D.S.I. G.P.S. POINTS P064 AND P107 (1/2" REBAR W/CAP NE SECTION CORNER SECTION 14) BEARS: N 59-39-31 E

2.) BASIS OF ELEVATION: PROJECT T.B.M. D.S.I. G.P.S. POINT P064 ASSUMED ELEV. = 100.00 N.G.S. ELEV. = 6783.41

3.) TOTAL AREA = 89,375.00 SQ.FT. = 2.05 ACRES

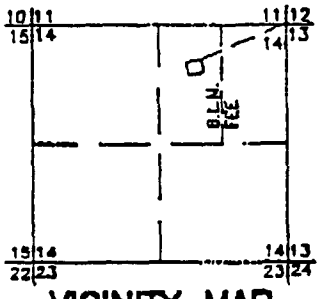
4.) NORTH & EAST COORDINATES ARE GRID DATUM IN METERS.

LEGEND:

C/L FENCE —x—x—x—

C/L ROAD ——— — ———

O = SET No.4 REBAR W/ALUM CAP "DAGGETT S.I. N.M. No.11393"



VICINITY MAP

SCALE: 1" = 4000'

U.T.M.	T.D.	9/18/91
REVISION	REV. BY	DATE

0 30 60

SCALE: 1" = 60'

DATE: 9/17/91

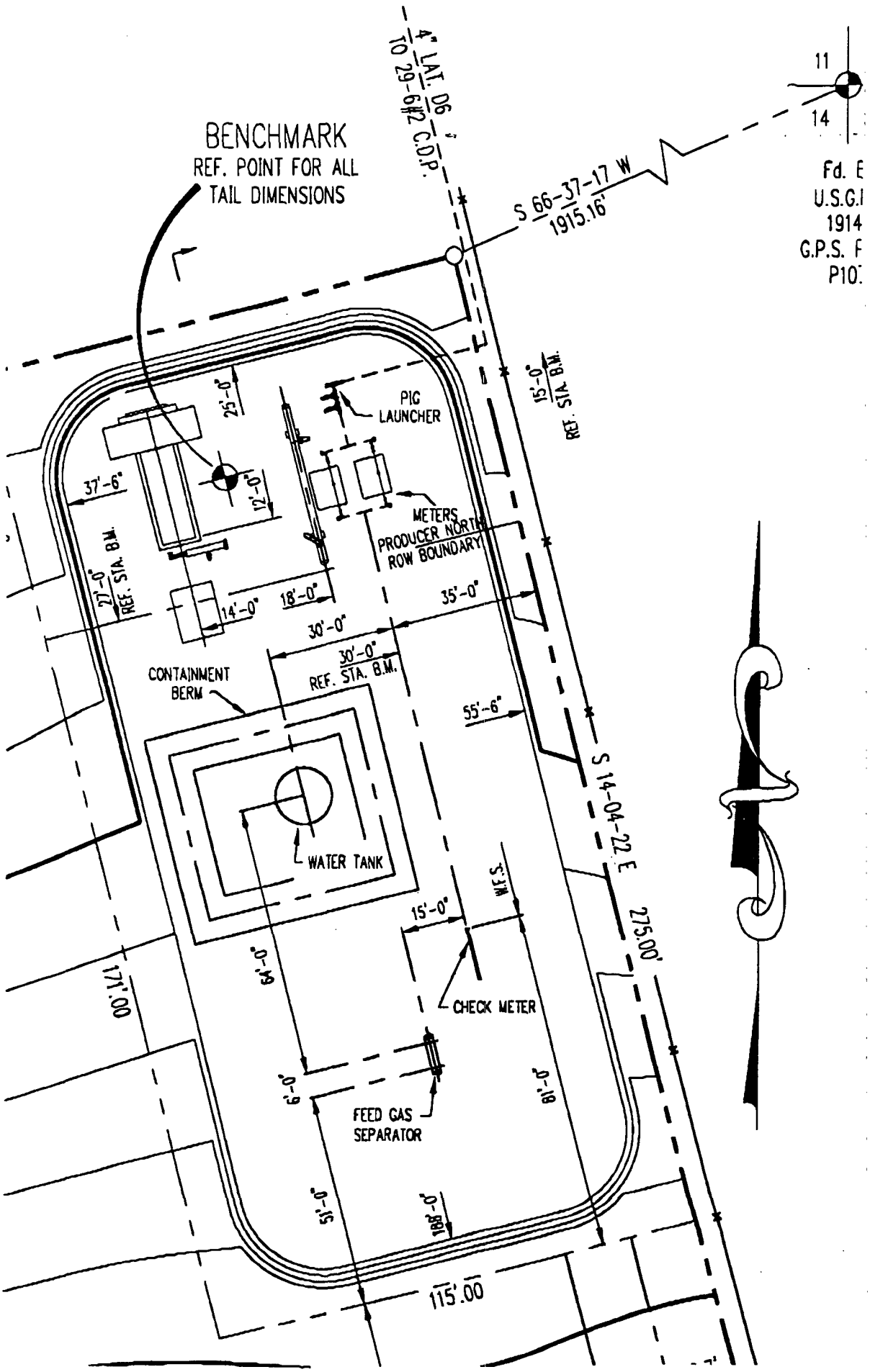
HENRY P. BROADHURST JR., A DULY QUALIFIED LAND SURVEYOR LICENSED UNDER THE LAWS OF THE STATE OF NEW MEXICO, DO HEREBY CERTIFY THAT THIS PLAT CORRECTLY REPRESENTS A SURVEY MADE BY ME OR UNDER MY DIRECT SUPERVISION AND THAT THIS SURVEY MEETS THE AMENDED MINIMUM STANDARDS FOR LAND SURVEYS IN NEW MEXICO.

DAGGETT SURVEYING, INC.
P.O. BOX NO.2789
FARMINGTON, NEW MEXICO 87401
(505) 326-1772
REGISTERED LAND SURVEYOR
NEW MEXICO No.11393

DRAWN BY: T.G. R.O.W. # NW181 DWG. REF. No. NW181816

FIGURE 3

FACILITY PLOT PLAN


BENCHMARK
REF. POINT FOR ALL
TAIL DIMENSIONS
4" LAT. 06
10 29-6#2 C.O.P.
S 66-37-17 W
1915.16'
11
14
Fd. E
U.S.G.I
1914
G.P.S. F
P10
PIG
LAUNCHER
25'-0"
37'-6"
12'-0"
METERS
PRODUCER NORTH
ROW BOUNDARY
15'-0"
REF. STA. B.M.
27'-0"
REF. STA. B.M.
14'-0"
18'-0"
35'-0"
30'-0"
30'-0"
REF. STA. B.M.
CONTAINMENT
BERM
55'-6"
S 14-04-22 E
275.00'
WATER TANK
15'-0"
W.E.S.
64'-0"
171.00'
CHECK METER
6'-0"
81'-0"
FEED GAS
SEPARATOR
51'-0"
108'-0"
115.00'

A. PURPOSE AND SCOPE

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

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

B. CONTENTS

C. POLICY

C.1 GENERAL

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

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

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

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

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

d. Section 112 of the Clean Air Act

e. Section 7 of the Toxic Substance Control Act

Supersedes Policy and Procedure 12.10.020 dated July 7, 1989.

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

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

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

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

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

a. Non-Transportation Related Facilities

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

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

b. Transportation Related Facilities

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

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

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

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

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

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

b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
c. A annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.

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

C.2 BULK STORAGE TANKS

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

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

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

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

C.3 FACILITY DRAINAGE

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

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

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

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

a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for pecipitation, or displacement by foreign materials.
b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.

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

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

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

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

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

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

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

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

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

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

D. PROCEDURE

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

Any Employee

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

NOTE: Refer to Attachment A for containment procedures.

Facility Supervisor

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

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

Gas Control Personnel

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

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

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

Facility Supervisor

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

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

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

Environmental Services

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

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

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

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Supervisor

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

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

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

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

ATTACHMENT A

Discharge or Spill Containment Procedures and Materials

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

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

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

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

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

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

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

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

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

SIGNED | PRINTED NAME AND TITLE | DATE

*SPECIFY **ATTACH ADDITIONAL SHEETS IF NECESSARY

RULE 116. - NOTIFI[redacted] OF FIRE, BREAKS, LEAKS, SPILLS [redacted] BLOWOUTS (as of 3-1-91)

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

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

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

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

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

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

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

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

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

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

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

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

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