

GW - 249

**PERMITS,
RENEWALS,
& MODS
Application**



New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division



FEBRUARY 21, 2012

Mr. Danell Zawaski
Williams Four Corners
188 County Road 4900
Bloomfield, New Mexico 87413

Dear Mr. Zawaski:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit", the Oil Conservation Division (OCD) has determined that the following facilities with a soon to expire permit are not required to operate under a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit for **GW-108** (SJ 30-5 #1 CDP CS), **GW-111** (SJ 32-8 # 2 CS), **GW-116** (32-8 3 CDP CS), **GW-117** (32-7 1 CDP CS), **GW-118** (31-6 1 CDP CS), **GW-120** (Pipkin CS), **GW-121** (SJ 29-6 # 2 CDP CS), **GW-122** (SJ 29-6 # 4 CDP CS), **GW-248** (Trunk A CS), **GW-249** (Trunk B CS), **GW-250** (Coyote Springs CS), **GW-256** (Lateral N-30 CS (Koch-Gardner)), **GW-257** (Trunk C CS), and **GW-274** (Pritchard Straddle CS) will be allowed to expire and you are not required to proceed with the renewal of these expired WQCC Discharge Permits. OCD will close these discharge permits in its database.

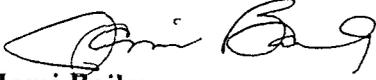
Because this WQCC Discharge Permit will now longer be in effect, you may be required to obtain separate OCD permit(s) for other processes at your facility, such as: pits, ponds; impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required. Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit.

Mr. Danell Zawaski

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If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

A handwritten signature in black ink, appearing to read "Jami Bailey". The signature is fluid and cursive, with the first name "Jami" and last name "Bailey" clearly distinguishable.

Jami Bailey

Director

JB/ll

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 12/11/08

or cash received on _____ in the amount of \$ 1700⁰⁰

from WILLIAMS FOUR CORNERS

for GW-249

Submitted by: LAURENCE ROMERO Date: 12/17/08

Submitted to ASD by: LAURENCE ROMERO Date: 12/17/08

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____



WILLIAMS FOUR CORNERS LLC

PO Box 21218

Tulsa, OK 74121-1218

Customer Support 1-866-778-2665

CHECK NUMBER	PAY DATE	SUPPLIER NO.	SUPPLIER NAME	TOTAL AMOUNT
4027038354	12/11/2008	486235	WATER QUALITY MANAGEMENT FUND	*****1,700.00

INVOICE NUMBER	INV. DATE	INVOICE DESCRIPTION	NET AMOUNT
09-DEC-2008B	20081209	OCS DISCHARGE PERMIT RENEWAL FEE TRUCK B BOOSTER <i>GW-299</i>	1,700.00

RECEIVED

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. The flat fee for a compressor station with a horsepower greater than 1001 hp is \$1700.00. Please submit this amount along with the signed permit. Checks should be made out to the New Mexico Water Quality Management Fund.
2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on March, 28, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *** This permit was never sent to the applicant at the time of renewal. It was sent on the date stated above. ** Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.*
3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its March 2006 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. Drum Storage: The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD performed an inspection of this facility on November 19, 2008. David Bays and Brandon Powell were in attendance. All photographs referenced below are referenced in the attachment of this permit. The inspection concluded the following

1. **Photo 1:** Condensate tank is not lined. Williams shall line all above ground tanks within the proscribed time frame as stated within this permit.
2. **Photo 2 – 4:** Holding area for contaminated soil needs to be properly maintained. Berms need to be addressed. Soil needs to be disposed/addressed within 120 days as stated within this permit.
3. **Photo 5 – 6:** The engineering of the below grade tank at this facility is questionable. Clarify if the conduit noted in the pictures is the leak detection system. If so, verify the integrity of the below grade tank.

Williams Four Corners has **60 days, by February 2, 2009**, to submit information on the below ground tank, # 3 and submit the testing results of the hydrostatic testing of the drain lines for this BGT. Overall the facility is in good condition. The OCD Environmental Bureau commends Williams Four Corners for the overall status of this facility.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone

Mr. David Bays
Williams Four Corners, LLC.
GW-249
December 3, 2008
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or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

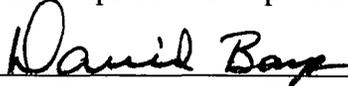
Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Williams Four Corners, LLC

Company Name-print name above

David Bays

Company Representative- print name



Company Representative- Signature

Title Sr. Environmental Specialist

Date: 12 / 08 / 2008

OCD Inspection: Williams Four Corners, Trunk B Compressor Station GW - 249

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: David Bays

Date: 11.19.08

Time: 9:04 - 9:20

Page 1

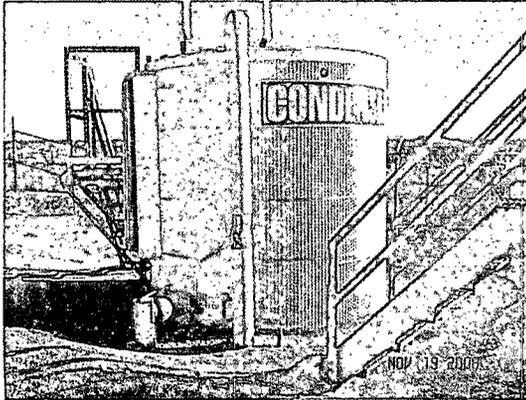


Photo 1: Unlined condensate tank.

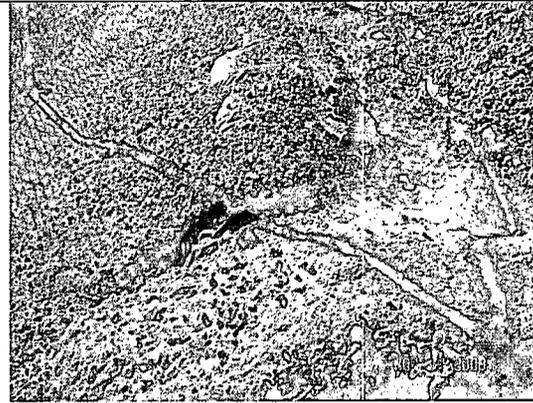


Photo 4: Eroded berm for contaminated soil area.

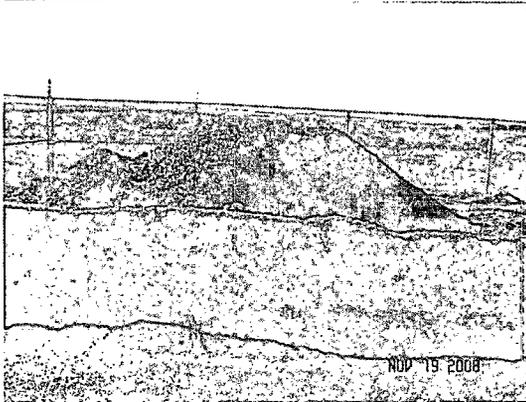


Photo 2: Contaminated soil area.

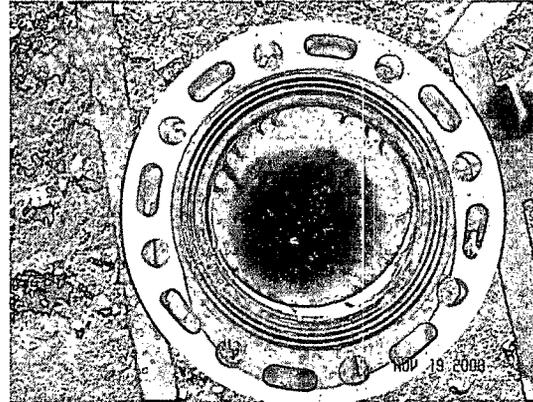


Photo 5: Leak detection system for below grade tank?

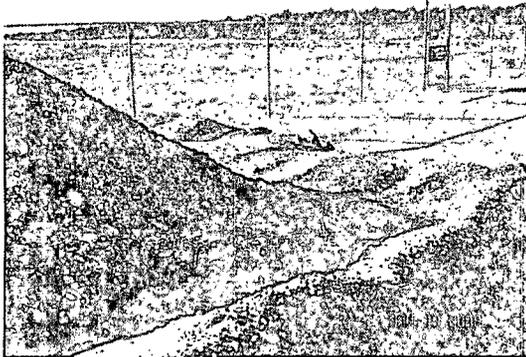
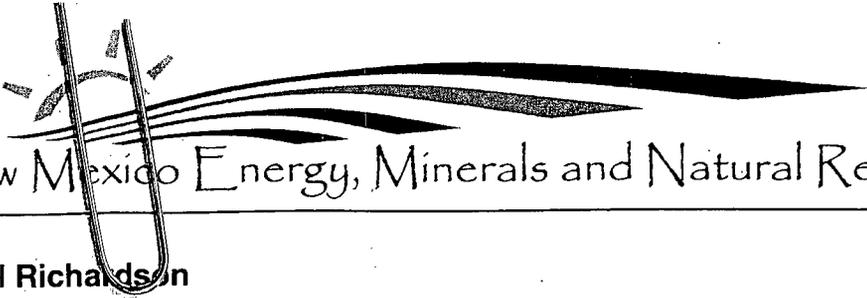


Photo 3: Berms of contaminated soil area.



Photo 6: Verifying conduit.



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor

Joanna Prukop

Cabinet Secretary

Reese Fullerton

Deputy Cabinet Secretary

Mark Fesmire

Division Director

Oil Conservation Division



December 3, 2008

Mr. David Bays
Williams Four Corners
188 Road 4900
Bloomfield, N.M. 87413

Re: Discharge Permit Renewal
Trunk B Compressor Station (GW-249)
SW/4 SW/4, Section 28, Township 31 North, Range 8 West, NMPM,
San Juan County, New Mexico

Dear Mr. Bays:

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

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

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

Sincerely,



Wayne Price

Environmental Bureau Chief

Attachments-1

xc: OCD District Office



ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division (“OCD”) has received the required \$100.00 filing fee. The flat fee for a compressor station with a horsepower greater than 1001 hp is \$1700.00. Please submit this amount along with the signed permit. Checks should be made out to the New Mexico Water Quality Management Fund.
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14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD performed an inspection of this facility on November 19, 2008. David Bays and Brandon Powell were in attendance. All photographs referenced below are referenced in the attachment of this permit. The inspection concluded the following

1. **Photo 1:** Condensate tank is not lined. Williams shall line all above ground tanks within the proscribe time frame as stated within this permit.
2. **Photo 2 – 4:** Holding area for contaminated soil needs to be properly maintained. Berms need to be addressed. Soil needs to be disposed/addressed within 120 days as stated within this permit.
3. **Photo 5 – 6:** The engineering of the below grade tank at this facility is questionable. Clarify if the conduit noted in the pictures is the leak detection system. If so, verify the integrity of the below grade tank.

Williams Four Corners has **60 days**, by **February 2, 2009**, to submit information on the below ground tank, # 3 and submit the testing results of the hydrostatic testing of the drain lines for this BGT. Overall the facility is in good condition. The OCD Environmental Bureau commends Williams Four Corners for the overall status of this facility.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone

or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Company Name-print name above

Company Representative- print name

Company Representative- Signature

Title _____

Date: _____

OCD Inspection: Williams Four Corners, Trunk B Compressor Station GW - 249

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: David Bays

Date: 11.19.08

Time: 9:04 – 9:20

Page 1

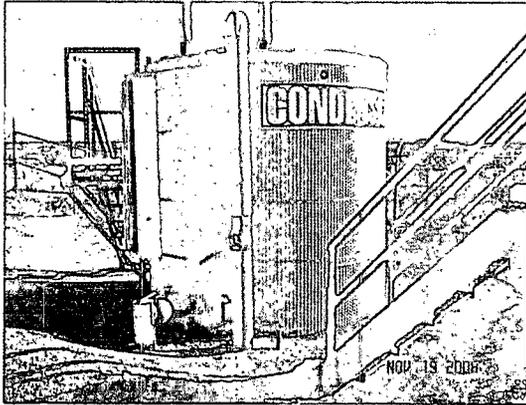


Photo 1: Unlined condensate tank.



Photo 4: Eroded berm for contaminated soil area.

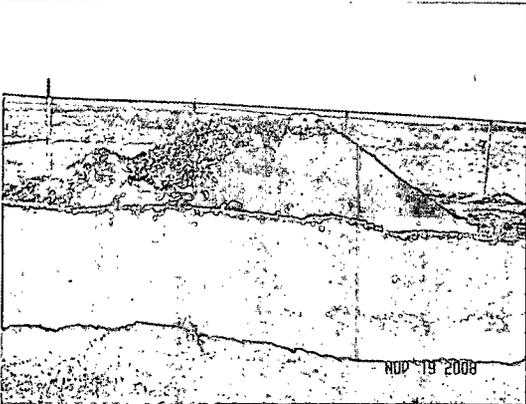


Photo 2: Contaminated soil area.

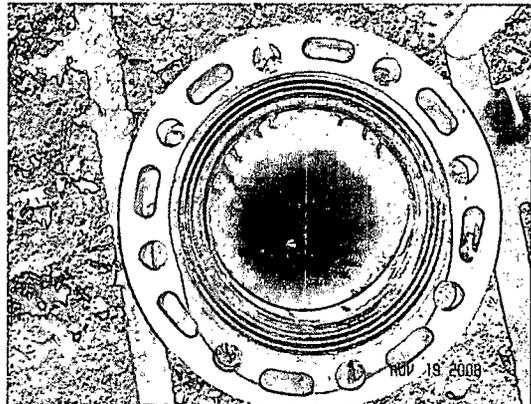


Photo 5: Leak detection system for below grade tank?

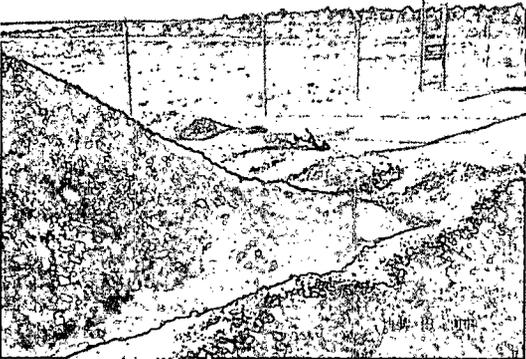


Photo 3: Berms of contaminated soil area.

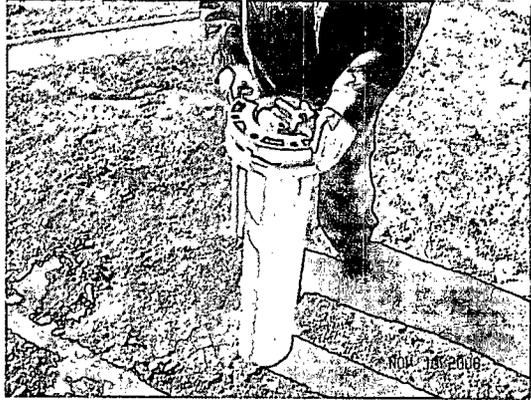


Photo 6: Verifying conduit.

ATTACHMENT TO THE DISCHARGE PLAN GW-249
WILLIAMS FIELD SERVICES
TRUNK B BOOSTER STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(September 18, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated July 13, 2001 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Disposal of Certain Non-Domestic Waste At Solid Waste Facilities permitted by the New Mexico Environmental Department as long as:

1. the waste stream is identified and authorized as such in the discharge plan, and
 2. existing process knowledge of such waste streams does not change without notification to the Oil Conservation Division.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
 5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
 6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

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

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

Accepted:

WILLIAMS FIELD SERVICES

by 
Title
SENIOR ENVIRONMENTAL SPECIALIST



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 18, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0814

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

RE: Discharge Plan Renewal Approval GW-249
Williams Field Services
Trunk B Booster Station
San Juan County, New Mexico

Dear Mr. Baretta:

The ground water discharge plan renewal GW-249 for the Williams Field Services Trunk B Booster Station located in the SW/4 SW/4 of Section 28, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge plan application was submitted on May 22, 1996 pursuant to Section 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan renewal application was submitted July 13, 2001 pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered non-hazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **August 9, 2006**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

Williams Field Services will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the Trunk B Booster Station.

Mr. Mark J. Bareta
GW-249 Trunk B Booster Station
September 18, 2001
Page 2

The discharge plan application for the Williams Field Services Trunk B Booster Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1700.00. The OCD has received the filing fee.

**Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505.**

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

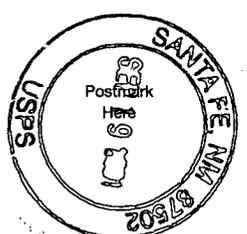
Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Aztec Office

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To:	
Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Name (Please Print Clearly) (To be completed by mailer) <i>M. Bareta</i>	
Street, Apt. No.; or PO Box No. <i>WFS</i>	
City, State, ZIP+ 4 <i>GW-249</i>	
PS Form 3800, July 1999 See Reverse for Instructions	

7099 3220 0000 5051 0814

ATTACHMENT TO THE DISCHARGE PLAN GW-249
WILLIAMS FIELD SERVICES
TRUNK B BOOSTER STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(September 18, 2001)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated July 13, 2001 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Disposal of Certain Non-Domestic Waste At Solid Waste Facilities permitted by the New Mexico Environmental Department as long as:

1. the waste stream is identified and authorized as such in the discharge plan, and
 2. existing process knowledge of such waste streams does not change without notification to the Oil Conservation Division.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
 5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
 6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

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

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

Accepted:

WILLIAMS FIELD SERVICES

by _____
Title



STATE OF NEW MEXICO
 ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
 2040 S. PACHECO
 SANTA FE, NEW MEXICO 87505
 (505) 827-7131

August 9, 1996

P 594 835 297

CERTIFIED MAIL
RETURN RECEIPT NO. P-594-835-297

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

RE: Approval of Discharge Plan GW-249
Trunk B Compressor Station
San Juan County, New Mexico

Dear Ms. Gooding:

The discharge plan GW-249 for the Williams Field Services Trunk B Compressor Station located in SW/4 SW/4, Section 28, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated May 22, 1996, from Williams Field Services and this approval letter with conditions of approval from OCD dated August 9, 1996. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within five working days of receipt of this letter.

The discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve Williams Field Services of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

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

Sent to WFS - Leigh Gooding	
Street & Number GW-249 Approval	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800 April 1995

Ms. Leigh Gooding
Williams Field Services
Page 2
August 9, 1996

Please note that Section 3104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

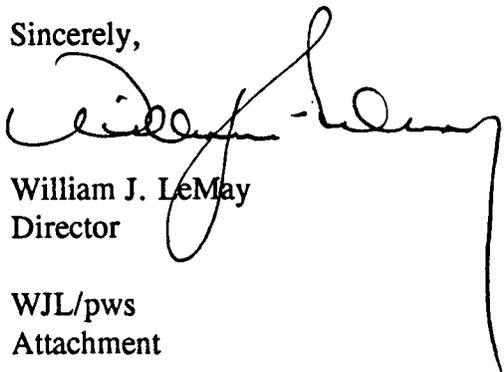
Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. **This approval will expire August 9, 2001, and an application for renewal should be submitted in ample time before that date.** It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval.

The discharge plan for the Williams Field Services Trunk B Compressor Station GW-249 is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty dollars (\$50) plus the flat fee of one thousand three-hundred and eighty dollars (\$1,380) for Compressor Stations over 3,000 horsepower.

The \$50 filing fee has been received by the OCD. The flat fee for an approved discharge plan has not been received by the OCD.

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

Sincerely,



William J. LeMay
Director

WJL/pws
Attachment

xc: Mr. Denny Foust

Ms. Leigh Gooding
Williams Field Services
Page 3
August 9, 1996

ATTACHMENT TO DISCHARGE PLAN GW-249
Williams Field Services - Trunk B Compressor Station
DISCHARGE PLAN REQUIREMENTS
(August 9, 1996)

1. **Payment of Discharge Plan Fees:** The \$1,380 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. **Williams Field Services Commitments:** Williams Field Services will abide by all commitments submitted in the Application dated May 22, 1996, from Williams Field Services and this approval letter with conditions of approval from OCD dated August 9, 1996.
3. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.
4. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
6. **Above Ground Saddle Tanks:** Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
7. **Tank Labeling:** All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

Ms. Leigh Gooding
Williams Field Services
Page 4
August 9, 1996

8. **Below Grade Tanks/Sumps:** All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

9. **Underground Process/Wastewater Lines:** All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing so that an OCD representative may witness the testing.

10. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

11. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Aztec OCD District Office at (505)-334-6178.

12. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

13. **New Mexico Oil Conservation Division Inspections:** Additional requirements may be placed on the facility based upon results from New Mexico Oil Conservation Division inspections.

14. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

15. **Conditions accepted by:** _____
Company Representative Date

Title



Trunk B Booster Station

NMOCD Discharge Plan GW-249

Williams Field Services
188 CR 4900
Bloomfield, NM 87413



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Appendix B – NMOCD Notification and Corrective Action

Appendix C – Public Notice



1.0 TYPE OF OPERATION

The Trunk B Booster Station was built in 1996 to provide metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Milagro Plant.

2.0 LEGALLY RESPONSIBLE PARTY

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

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

3.0 LOCATION OF FACILITY

The Trunk B Booster Station is located in Section 28, Township 31 North, Range 8 West, in San Juan County, New Mexico, approximately 16.3 miles northeast of Bloomfield, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangles: Archuleta, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

4.0 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

5.0 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 seven 1367-hp (site-rated) engines. Compressors and dehydrators may be installed or removed to meet demand. In addition, there are various storage tanks, support structures and ancillary equipment.

6.0 SOURCE, QUANTITY AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

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



7.0 TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS AND WASTE SOLIDS

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, certain absorbents, spill residues, 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, laboratory waste, empty drums, and waste water. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

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

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

8.0 STORM WATER PLAN

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

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

8.1 Site Assessment and Facility Controls

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

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



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

8.2 Best Management Practices

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

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

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

9.0 INSPECTION, MAINTENANCE AND REPORTING

Williams' personnel will operate and maintain the facility. The facility will be remotely monitored for equipment malfunctions and an operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. Regular inspections will be conducted throughout the facility. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

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



10.0 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

Spill containment berms around above ground storage tanks will be designed to contain 133% of the tank capacity. The below-grade tanks will be constructed with a means of leak detection, and will either be double-walled tanks, double-bottomed tanks or a tank set on an impermeable pad.

Williams' corporate policy and procedure for Release Reporting and Pollution Prevention and Control are included in Appendix A. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).

11.0 SITE CHARACTERISTICS

The Trunk B Booster Station is located approximately 17 miles east of Aztec, New Mexico. The facility is located at an elevation of approximately 6500 feet above mean sea level. The natural ground surface topography slopes downward toward the east. The maximum relief over the site is approximately 10 feet. Intermittent flow from the site will follow the natural drainage to the east to the Simon Canyon drainage. Simon Canyon drains to the south into the San Juan River. The San Juan River, approximately 3.1 miles to the south-southeast of the site, is the nearest down-gradient perennial source of surface water, at an elevation of approximately 5700 feet.

A review of the available hydrologic data (1,2) for this area revealed that there are no water wells within a ¼-mile radius of the Trunk B Booster 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. The estimated ground water depth at the site is 400 to 800 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 PPM.

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

References

¹Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., Padgett, E.T., 1983, Hydrology and Water Resources of San Juan Basin, New Mexico Bureau of Mines and Mineral Resources, Hydrologic Report 6.

²Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2005.



Effective Date:

March 2006

12.0 FACILITY CLOSURE PLAN

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

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

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

TABLES

TABLE 1
SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS
TRUNK B BOOSTER STATION

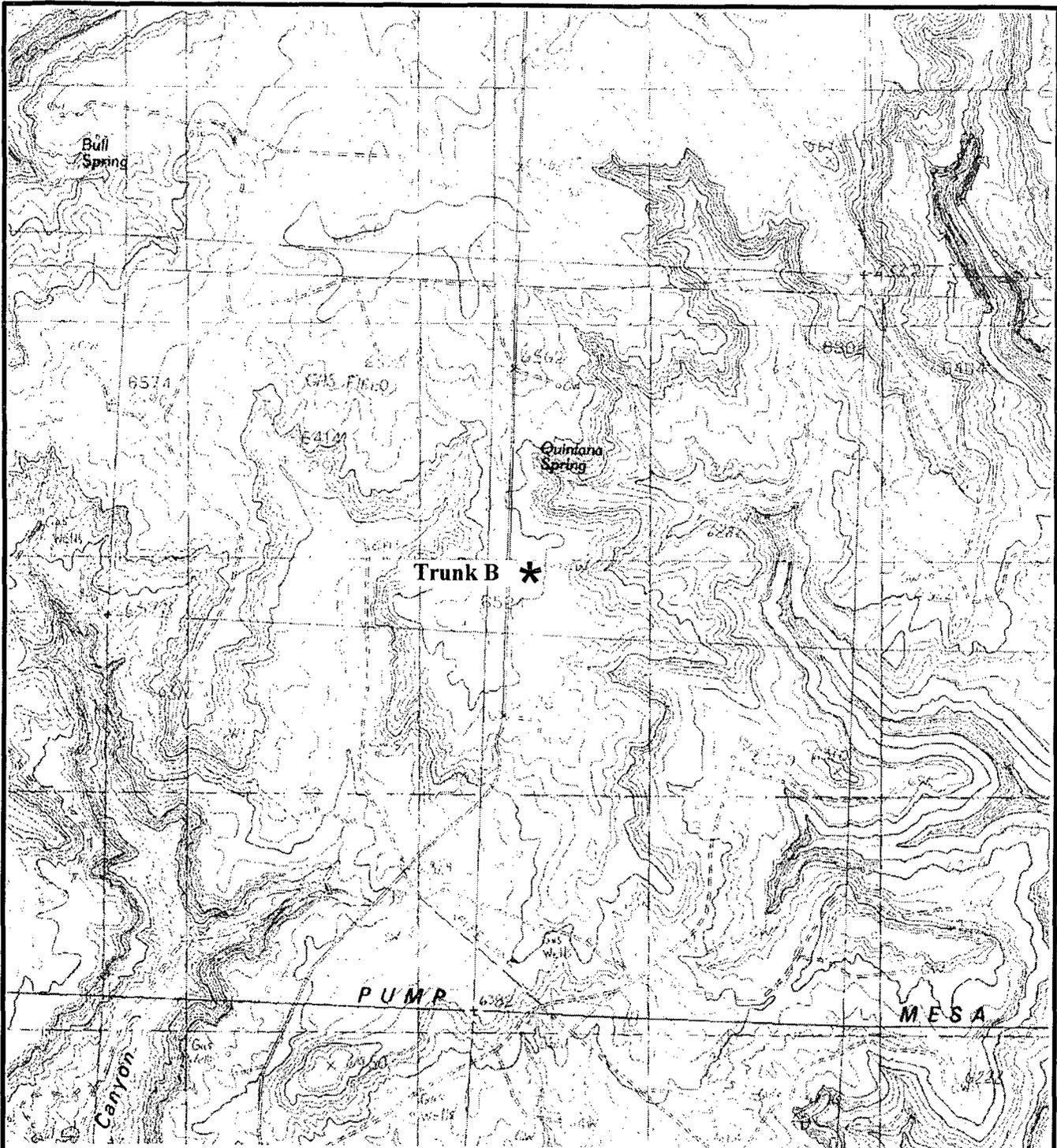
PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Natural Gas Condensate	Scrubber, Gas Inlet Separator	2000-6000 bbl/year	No Additives
Wash Down Water	Compressor Skid	500-5000 gal/year/engine	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressor	1000-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	50-500/year/engine	No Additives
Used Process Filters	Air, Inlet, Fuel Gas	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

**TABLE 2
TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS
TRUNK B BOOSTER STATION**

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Natural Gas Condensate	Above Ground Storage Tank	2940 gal	Berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams evaporation facility or may be disposed at NMOCD-approved facility.
Waste Water/Washdown Water	Below-ground sump, vaulted	740 gal	Dual-walled tank	Non-exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Used Oil	Above Ground Storage Tank	4 @ 500 gal*	Concrete pad and wastewater system	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Spill Residue (i.e., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/83 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
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/dispersed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above Ground Storage Tank	4 @ 500 gal*	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/dehydrators installed on site.

FIGURES



Source: USGS Archuleta, NM Quadrangle

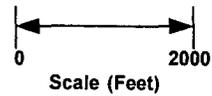
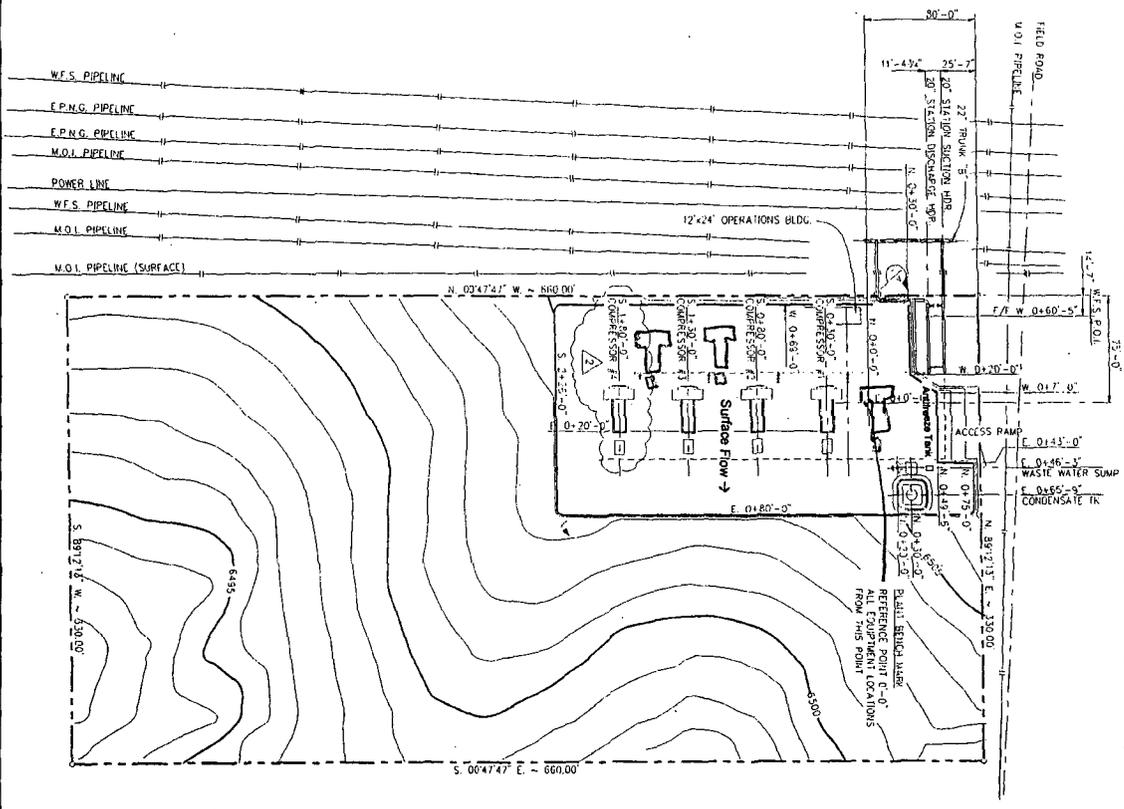


Figure 1 Site Vicinity / Topographic Map

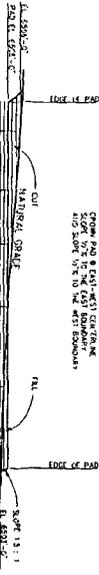
Trunk B Compressor Station

Section 28, Township 31N Range 8W

San Juan County, New Mexico



Disc No.	Description	Date	Disc No.	Date														
	REFERENCE PLANS																	
	REFERENCE MEASUREMENTS																	
	REVISIONS																	



PROFILE "A-A"
VERTICAL SCALE ENLARGED 3:1

AREA = 217,800 SQ. FT.
OR 5.00 ACRES

- NOTES:
- EXCAVATION AREA SHOWN IS AN APPROXIMATE AREA REQUIRED, AND MAY BE ADJUSTED AS REQUIRED BY ACTUAL FIELD CONDITIONS.
 - LOCATIONS OF MISC. EQUIPMENT (IE LIGHTING STANDARDS, PULSATION BOTTLE, ETC.) ARE APPROXIMATE. SEE PIPING PLANS FOR ACTUAL LOCATIONS.
 - DRAINAGE AND DIVERSION DAMS ARE TO BE CONSTRUCTED AS REQUIRED AFTER FINAL EXCAVATION AND GRADING IS COMPLETE.

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANY GROUP

SAN JUAN TRUNK "B"
BOOSTER COMPRESSOR SITE
EXCAVATION & SITE LAYOUT

DWG. NO. TSB-1-111

APPENDICES

Appendix A
WFS Spill Control Procedures

Release/Spill Report Form

Month Day Year
 Release Verification Time: Release Stop Time:
 Region District Area
 Location Name Location Identifier
 Mainline Name Mainline Identifier
 Area Manager Company Asset State
 Address County Zip Code
 Release Discovered by: Time
 Release Reported by: Time
 Section Township Range Milepost Tract #
 Offshore Latitude Longitude
 Release Reportable? Waterway Affected? Name

Report	Date	Number	Time	Name	Title	City	State
NRC <input type="checkbox"/>							
SERC <input type="checkbox"/>							
LEPC <input type="checkbox"/>							
TRRC <input type="checkbox"/>							
EPA <input type="checkbox"/>							
Other <input type="checkbox"/>							

Product Released: Total Released
 Cause of Release: BBL's Recovered Wet
 Released To: Other: BBL's Recovered Soil
 Remarks:
 BBL's Not Recovered
 Origin Of Release:

Temperature Relative Humidity Precipitation
 Cloud Cover Wind Speed Wind Direction
 Injury Death Fire Explosion
 Unconsciousness Hospitalization
 Loss/Damage Estimate
 Incident Investigator:
 Environmental Contact for this Release:
 Safety Contact for this Release:
 Compliance Administrator for this area:
 Form completed by:
 Completion Date:
 Form was e-mailed to Williams on:

	System Integrity Plan	System Integrity Plan	Document No. 6.04-ADM-002	
		Revision No: 7	Effective Date: 01/01/05	Page: 1 of 10
Procedure: <p style="text-align: center;">RELEASE REPORTING</p>				

1.0 PURPOSE

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

Note 1:

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

Note 2:

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

2.0 PROCEDURE

2.1 Offshore Release Reporting (w/sheen on water)

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

2.1.1.1 Any release that causes sheen on water.

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

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

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

2.2.1.1 Any Gas release >50 MSCF;

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

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

- 2.2.1.4 Any unintentional, non-maintenance related release \geq 5 gallons of a Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;
 - 2.2.1.5 Any release of Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or
 - 2.2.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.3.2.1 through 2.3.1.6.
- 2.2.2 The Environmental Specialist and the DOT Compliance Coordinator will determine reportability and, if required, perform telephonic notifications in accordance with applicable regulations.
- 2.2.3 The Environmental Specialist will complete the WES - 35 Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 10 working days.
- 2.2.4 The Environmental Specialist will complete any required follow-up written reports and/or documentation for non-transportation events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.
- 2.2.5 The DOT Compliance Coordinator will complete any required follow-up reports and/or documentation for transportation related events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.

2.3 Onshore Releases

- 2.3.1 Immediately report to 3E Company at 888-677-2370 (toll free) the following type(s) of onshore release(s) or event(s):
- 2.3.1.1 Any liquid release that enters, or is expected to enter, any waterway (i.e., ditch, arroyo, intermittent stream, etc.);
 - 2.3.1.2 Any individual liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) $>$ 1 gallon;
 - 2.3.1.3 Any cumulative liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) $>$ 5 gallons within a 24-hour period (drips, pinhole leaks, etc.). (NOTE: Report immediately upon determining, or suspecting that the 5 gallon/24 hour threshold will be met or exceeded);
 - 2.3.1.4 Any Gas release $>$ 50 MSCF;
 - 2.3.1.5 Any event that involves a release of any amount of Gas or hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility and a death or personal injury necessitating in-patient hospitalization;

- 2.3.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or hazardous liquids lost and/or, costs of clean up or recovery of the operator **and/or** others \geq \$50,000;
- 2.3.1.7 Any unintentional, non-maintenance related release \geq 5 gallons of a hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;
- 2.3.1.8 Any release of hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or
- 2.3.1.9 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.4.1.1 through 2.4.1.8.
- 2.3.2 3E Company will immediately make the required telephonic notifications in accordance with the Telephonic and Written Release Reporting Requirements.
- 2.3.3 Information that will be needed when reporting to 3E is on WES-35 - Release Report Form.
- 2.3.4 Refer to the Onshore Release/Spill Notification Flowchart for more information regarding the onshore reporting workflow.
- 2.3.5 The Environmental Specialist will follow-up with Operations to verify that adequate response and reporting measures have been taken for each release and track closure of each release report with appropriate regulatory agencies.

Note:**Flares and Thermal Oxidizers**

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

2.4 Planned / Scheduled Blowdowns

- 2.4.1 Notify your Environmental Specialist as far as possible in advance of planned / scheduled blowdowns that are not an exception per 2.5 of this procedure.
- 2.4.2 Be prepared to provide to your Environmental Specialist a current extended chromatographic analysis of the product to be released.

2.4.3 The Environmental Specialist will:

- 2.4.3.1 Review information provided;
- 2.4.3.2 Notify appropriate agencies;
- 2.4.3.3 Obtain required permits or permissions;
- 2.4.3.4 Provide Operations with any special conditions and / or limitations to be observed before, during, and/or after the planned / scheduled blowdown event; and
- 2.4.3.5 Perform any required post event reporting or follow-up to agencies.

2.5 Exceptions to Procedure:

- 2.5.1 Sheen on rainwater within facilities, dikes, valve boxes, etc.. that is not the result of a release event. However, one must follow proper disposal and housekeeping practices for these cases.
- 2.5.2 Routine releases to pollution control devices (flares, thermal oxidizers, etc.) **in accordance with permit conditions or limitations.**
- 2.5.3 Site-specific procedures may qualify as an exception, if reviewed and approved by your Environmental Specialist.

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

- 2.5.1 Within 45 days of any release that affected soil or water, Operations will submit to the Environmental Specialist the following information:
 - 2.5.1.1 Quantity of soil, water, or product removed as a result of a release;
 - 2.5.1.2 Disposition of soil, water, or product removed (i.e., land, farm, landfill, disposal, etc.);
 - 2.5.1.3 Update of costs incurred because of release. (Includes value of lost product, repair costs response costs, clean up costs, disposal costs, etc.)
 - 2.5.1.4 Environmental Specialist will update release database with additional information from 2.5.1.1 through 2.5.1.3.

2.6 Release Database

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

3.0 REFERENCES

3.1 Regulatory

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

3.1.2 49 CFR 191, 192 and 195

3.2 Related Policies/Procedures

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

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

4.0 DEFINITIONS

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

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

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

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

- 4.5 Onshore Release** - Any release that does not occur offshore in a Tidally Affected Zone.
- 4.6 Tidally Affected Zone** - Relating to or affected by tides: *the tidal maximum; tidal pools; tidal waters.*
- 4.7 DOT jurisdictional Pipeline or Pipeline Facility** – Pipeline or pipeline facility subject to 49 CFR Parts 192 or 195.
- 4.8 Hazardous Liquid** – Per 49 CFR 195.2 - petroleum, petroleum products, or anhydrous ammonia.

➤➤➤End of Procedure<<<

System Integrity Plan Change Log

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

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

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

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

	System Integrity Plan	Element: Environmental Protection	Document No: 6.04-ADM-001	
		Revision No: 6	Revision Date: 01/01/05	Page: 1 of 8
Procedure: POLLUTION PREVENTION AND CONTROL				

1.0 PURPOSE

- 1.1 To outline the conditions under which facilities are subject to the requirements of the EPA Oil Pollution Prevention program, specify the actions required at facilities to comply with pollution prevention and/or response plans, and to ensure facilities are in compliance with all applicable oil pollution prevention regulations.

2.0 PROCEDURE

- 2.1 At least Annually, perform visual inspections of oil storage tanks and containers (single containers with capacities >55 gallons) for signs of deterioration, discharges or accumulation of oil inside diked areas. Document Inspections on 0019 – External Visual Tank Inspection form.
- 2.2 Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with SIP-ADM-7.15 - Aboveground Storage Tank Integrity
- 2.3 Perform maintenance or repairs necessary to prevent or stop leaks or releases and document the work following company maintenance and repair procedures.
- 2.4 Maintain appropriate spill response equipment at an easily accessible location at the facility and ensure facility personnel are trained on the materials and their use(s).
- 2.5 Routine releases of storm water from containment areas shall be documented on WES-87 – Record of Secondary Containment Discharge. All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.
- 2.6 **Facility Pollution Prevention Plans**
- 2.6.1 The oil pollution prevention regulations include two plans related to non-transportation onshore facilities. The most common is the Spill Prevention Control and Countermeasure (SPCC) Plan. The second is the Facility Response Plan (FRP).
- 2.6.1.1 An SPCC Plan is a written document that describes the steps a facility takes to prevent oil spills and to minimize the risk of harm to the environment.
- 2.6.1.2 A Facility Response Plan is a written document that

describes the procedures for responding to a spill.

NOTE

If your facility requires a Facility Response Plan (FRP), it will include an Emergency Response Action Plan (ERAP), which is equivalent to a Williams Emergency Response Plan (ERP). Therefore, if a facility has an FRP, the Environmental Specialist will be responsible for preparation of the ERAP, and a separate ERP (as required by SIP-ADM-12.01 - Emergency Response and Planning) is not required. See 6.04-ADM-003 – Plans Required for Facilities-Pipelines to determine the plans applicable to your facility/pipeline.

- 2.6.2 The Environmental Specialist is responsible for preparation of SPCC plans or FRPs.
- 2.6.3 Operations is responsible for:
 - 2.6.3.1 Reviewing draft plan(s), providing comments to the Environmental Specialist (ES) and meeting published timeframes for reviews and comments
 - 2.6.3.2 Ensuring it is capable of complying with the document upon publication
 - 2.6.3.3 Reviewing the plan(s) Annually and providing revisions or updates to the ES
 - 2.6.3.4 Performing inspections required by the plan(s)
 - 2.6.3.5 Maintaining documentation required by the plan(s) on the appropriate forms
 - 2.6.3.6 Conducting annual drills if an FRP is in-place for the facility
 - 2.6.3.7 Ensuring adequate response contractors are available in the area
 - 2.6.3.8 Providing to the ES a current site survey to allow for secondary containment calculations to be conducted.
- 2.6.4 Requirements to Maintain Records - The facility is required to maintain all inspection logs, secondary containment drainage logs, etc., for a period of 5 years. These records must be maintained in a centralized location at the facility and must be easily accessible to an inspector.
- 2.6.5 Requirements to Maintain the EMIS - The EMIS will be populated with all requirements of the facility's plans (SPCC/FRP) and any associated best management practices. The Environmental Group (ES, and CA) is responsible for maintaining the database.

2.6.6 Training Requirements – The Federal regulations for oil pollution prevention require annual training on the facility's plans and an overall education on plan requirements/purpose. Operations is responsible for ensuring all personnel receive the required SPCC/FRP training on an annual basis. This training may be coordinated with the Environmental Specialist as part of the required annual review.

3.0 REFERENCES

3.1 Regulatory

- 3.1.1 Oil Pollution Prevention Act of 1990
- 3.1.2 40 CFR 112, Oil Pollution Prevention (EPA)
- 3.1.3 Applicable state, regional and local regulations

3.2 Related Policies/Procedures

- 3.2.1 Training CD for SPCC Plans
- 3.2.2 SIP-ADM-7.15 - Aboveground Storage Tank Integrity

3.3 Forms and Attachments

- 3.3.1 WES-87 – Record of Secondary Containment Discharge
- 3.3.2 WES-35 - Release Report Form
- 3.3.3 6.04-ADM-002 - Release Reporting
- 3.3.4 6.04-ADM-003 – Plans Required for Facilities-Pipelines
- 3.3.5 0019 – External Visual Tank Inspection
- 3.3.6 SIP-ADM-12.01 - Emergency Response and Planning
- 3.3.7 Spill Prevention Control and Countermeasure (SPCC) Plan
- 3.3.8 Facility Response Plan
- 3.3.9 SIP Feedback/Change Request

4.0 DEFINITIONS

- 4.1 **Aboveground Storage Tank (AST)** – A tank that has all its surfaces above the existing grade so as to allow visual inspection of all the tank surfaces.
- 4.2 **DOT** – Department of Transportation
- 4.3 **EPA** – Environmental Protection Agency

- 4.4 Facility** – Any terminal, facility, pipeline, etc. owned or operated by Williams.
- 4.5 Facility Response Plan** - Required for any non-transportation related facility that could be expected to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines.
- 4.6 MMS** – Minerals Management Service
- 4.7 Navigable Waters** – The Clean Water Act defines the navigable waters of the United States as the following: all navigable waters, as defined in judicial decisions prior to the passage of the Clean Water Act, and tributaries of such waters; interstate waters; intrastate lakes, rivers, and streams that are used by interstate travelers for recreational or other purposes; and intrastate lakes, rivers, and streams from which fish and shellfish are taken and sold in interstate commerce.
- 4.8 Oil** – Oil of any kind or any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. The EPA accepts the definition of oil as the list provided by the USCG at <http://www.uscg.mil/vrp/faq/oil.shtml>.
- 4.9 Oil Pollution Act (OPA) of 1990** – OPA 1990 requires regulated facilities to submit spill response plans that address the facility owner's or operator's ability to respond to a "worst-case discharge." OPA 90 is being implemented by EPA under 40 CFR 112, Oil Pollution Prevention, Section 112.20, Facility Response Plans.
- 4.10 Oil Spill Response Plan** – An Oil Spill Response Plan provides information on responding to a spill at a facility and is intended to satisfy the requirements of the Oil Pollution Act of 1990; Facility Response Plan requirements of 40 CFR 112, Oil Pollution Prevention (EPA); Pipeline Response Plan requirements of 49 CFR 194, Response Plans for Onshore Oil Pipelines (RSPA); Facility Response Plan requirements of 33 CFR 154 Subpart F, Response Plans for Oil Facilities (USCG); and 30 CFR 254, Oil-Spill Response Requirements for Facilities Located Seaward of the Coast Line (MMS).
- 4.11 OSRO** – Oil Spill Response Organization
- 4.12 PREP** – National Preparedness for Response Exercise Program
- 4.13 Release** – synonymous with spill in this document. Williams' definition of a release is contained in the Release Reporting Guidelines which is maintained by the Environmental Group.
- 4.14 RSPA** – Research and Special Programs Administration
- 4.15 Spill Prevention, Countermeasures, and Control (SPCC) Plan** – An SPCC Plan provides information on spill prevention at a facility and is intended to satisfy the requirements of the SPCC Plan requirements in 40 CFR 112, Oil Pollution Prevention.

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

4.17 USCG – United States Coast Guard

➤➤➤End of Procedure◀◀◀

System Integrity Plan Change Log

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

<p>2.5</p>	<p>New Routine releases of storm water from containment areas shall be documented on <u>WES-87 – Record of Secondary Containment Discharge</u>. All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.</p>
<p>2.5</p>	<p>Deleted:</p> <p>When to Initiate</p> <p>2.5.1 The first person to discover a spill/release at a facility will immediately take appropriate action to protect life, and ensure safety of personnel. An attempt will be made to mitigate the effects of the spill by terminating operations, closing valves, or taking other measures to stop the leak or spill as long as personnel are not in danger.</p> <p>2.5.2 For onshore releases: If the spill is reportable (refer to <u>6.04-ADM-002 - Release Reporting procedure</u>), the appropriate person (usually person discovering the release) will immediately notify the 24 hour O&TS release hotline at 1-888-677-2370 and, if necessary, local emergency response personnel/contractors.</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>NOTE</p> <p>The current 24 hour O&TS release hotline is managed by a contractor, 3E. 3E provides 24-hour service/support, to include reporting major incidents and providing on-demand MSDSs.</p> </div> <p>2.5.3 Offshore releases: If the spill creates a sheen (refer to <u>6.04-ADM-002 - Release Reporting procedure</u>), the appropriate person (usually person discovering the release) will immediately notify O'Brien's Oil Pollution Services (OOPS) at 985-781-0804 and the Environmental Specialist or his/her management team.</p> <p>2.5.4 Receiving and reviewing the initial release report</p> <p>2.5.4.1 Onshore releases: Within 24 hours, 3E will distribute an initial release report to the Area. The initial distribution will be made via Area e-mail boxes.</p> <p>2.5.4.2 Each person that receives an initial report is required to review the report for correctness and clarity. All corrections must be provided to 3E in a return e-mail within 4 working days of receipt.</p> <p>2.5.4.3 Offshore releases: The ES will complete the <u>WES-35 - Release Report Form</u> and distribute for review. All corrections must be provided to the ES in a return email within 4 working days of receipt.</p> <p>2.5.5 Receiving a final release report</p>

		<p>2.5.5.1 Onshore releases: 3E will gather the corrections from the initial release report and distribute a final report within 5 days of the release. The final report is sent to a distribution list controlled by Williams.</p> <p>2.5.5.2 Off-shore releases: The ES or Compliance Administrator will gather corrections and distribute the final report to all stakeholders using the appropriate area and final distribution lists.</p> <p>2.5.6 Providing Follow-up Information on the Release</p> <p>2.5.6.1 The Operations Manager or his/her designee shall notify the local Environmental Specialist of the specific response measures taken to respond to the release and all follow-up actions that were taken as a result of the spill or release, if this information was not reported to 3E. It is recommended that the update be provided within 2 workdays of the actions being completed.</p>
	2.6 Note Box	Added See <u>6.04-ADM-003 – Plans Required for Facilities-Pipelines</u> to determine the plans applicable to your facility/pipeline.
	2.6.6	Added This training may be coordinated with the Environmental Specialist as part of the required annual review.
	3.3.4	Added 0018 – Visual External Inspections Renumbered
	4.6	Deleted Hydrocarbons and Other Fluids definition

Appendix B
NMOCD Notification and Corrective Action

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company		Contact
Address		Telephone No.
Facility Name		Facility Type
Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

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

Latitude _____ Longitude _____

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*		
Describe Area Affected and Cleanup Action Taken.*		

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

Signature:		OIL CONSERVATION DIVISION	
Printed Name:		Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:	
E-mail Address:	Conditions of Approval:		Attached <input type="checkbox"/>
Date:	Phone:		

* Attach Additional Sheets If Necessary

Appendix C
Public Notice



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

March 10, 2006

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Trunk B Booster Station (GW-249). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during April 2006.

The facility, located in Section 28, Township 31 North, Range 8 West, San Juan County, New Mexico, approximately 16.3 miles northeast of Bloomfield, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be at least 400 to 800 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,


 Clara Cardoza
 Environmental Compliance Administrator

7004 2510 0005 2372 9519

FARMINGTON, NM 87401

Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (no return required)	1.85
Insured Delivery Fee (no return required)	
Total Postage & Fees	\$ 4.64

UNIT ID: 0012
 Clerk: KSS093
 03/10/06

BLM
 1235 N. La Plata Hwy
 Farmington, NM 87401

Trk B



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

August 9, 2004

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

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

**RE: Site Modification Notification
Trunk B Booster Station GW-249
San Juan County, New Mexico**

Dear Mr. Lane:

The OCD has received the site modification letter, dated August 3, 2004, from Williams Field Services for the Trunk B Booster Station located in the SW/4 SW/4 of Section 28, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. The installation of additional tanks and compressor is considered a minor modification to the approved discharge plan. **The site modification is herewith approved with the stipulation that all modifications comply with the discharge plan and/or any renewals previously approved.**

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

If you have any questions contact me at (505) 476-3489.

Sincerely,

W. Jack Ford, C.P.G.

Environmental Bureau

Oil Conservation Division

cc: OCD Aztec District Office

RECEIVED

AUG 05 2004

OIL CONSERVATION
DIVISION



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

August 3, 2004

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

RE: Request to Update
Compressor Station Discharge Plan: GW-249
Trunk B Booster Station, San Juan County, NM

This correspondence is to request the update of the referenced facility discharge plan to include the addition of lube oil (new & used) tanks and compressors. Product storage and handling, waste management, and spill prevention will continue as specified in the plan.

The attached Table 1 summarizes the updated equipment list, and the attached site plan has been updated.

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

Respectfully submitted,

Michael Lane
Williams Energy Services
Four Corners Area Environmental Specialist

Encl:

XC: Larry Jones, Team Lead
Trunk B Environmental File: 220

**Table 1
Facility Storage and Containment Capacities
Trunk B Compressor Station**

Number of Tanks	Storage/Process Equipment Information				Secondary Containment	
	Name	Contents	Capacity (gallons)	Construction Material	Capacity gallons	Type
1	Condensate Tank	Condensate/Produced Water	2,940	Vertical Steel	5,386	Earthen Berm
1	Waste Water Below-Grade Tank	Waste Water	740	Dual-Walled Fiberglass	1,315	Dual-Walled
6*	Compressor Used Oil Tank	Used Oil	500	Horizontal Steel	>2,940	Concrete pad & waste water system
6*	Compressor Lube Oil Day Tank	Lube Oil	500	Horizontal Steel	>2,940	Concrete pad & waste water system
6*	Engine/Compressor	Lube Oil	Variable	Engine/Compressor Crankcase	>2,940	Concrete pad & waste water system
1**	Antifreeze Tank	Antifreeze**	500	Vertical Steel	718	Metal Tank

Notes: There are no surface water impoundments at this Facility. For surface flow direction see plot plan

* Compressors may be installed or removed to meet demand. The number of tanks may vary with the number of compressors present.

** Not subject to the provisions of 40 CFR 112.

