

GW - 274

**GENERAL
CORRESPONDENCE**

YEAR(S):

2006-1996

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, August 14, 2007 12:19 PM
To: 'Bays, David'
Cc: Price, Wayne, EMNRD
Subject: Williams Four Corners LLP Discharge Plans "Minor Modification", corrected Expiration Date

Mr. David Bays
 188 County Road 4900
 Bloomfield, N.M. 87413

August 14, 2007

Dear Mr. David Bays:

Re: Minor Modification to the following Discharge Plan Permits, Corrected Expiration Date(s)
 GW - 068, SIMS MESA CS
 GW - 248, TRUNK "A" BOOSTER
 GW - 256, N-30 KOCH GARDNER
 GW - 257, TRUNK "C" BOOSTER
 GW - 274, PRITCHARD STRADDLE CS

Upon final review of the Discharge Plan (DP) Permits, the Oil Conservation Division discovered that the expiration dates on the following signed Discharge Plans (DP): GW-068, GW-248, GW-256, GW257 and GW-274 contained an incorrect "Expiration Date." This e-mail serves as a "Minor Modification" to the DP Permits and serves to correct the expiration date in each of the stated Discharge Plans.

DP	INCORRECT DATE	CORRECT DATE
GW - 068, SIMS MESA CS	04-04-12	01-17-12
GW - 248, TRUNK "A" BOOSTER	04-04-12	03-28-12
GW - 256, N-30 KOCH GARDNER	04-04-12	03-28-12
GW - 257, TRUNK "C" BOOSTER	04-04-12	03-28-12
GW - 274, PRITCHARD STRADDLE CS	04-04-12	03-28-12

This "Minor Modification" e-mail correspondence has been attached to the DP for each of the files stated above.

Please contact me if you have questions on the corrected and official expiration date of these approved Discharge Permits. Sorry for any inconvenience this may have caused you.

Thank you.

llowe

Leonard Lowe
 Environmental Engineer
 Oil Conservation Division, EMNRD
 1220 S. St. Francis Drive
 Santa Fe, New Mexico 87505
 Phone: (505) 476-3492
 Fax: (505) 476-3462
 E-mail: leonard.lowe@state.nm.us

8/14/2007

RECEIVED

2007 NOV 13 AM 11 55



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

November 7, 2007

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

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

Dear Mr. Lowe,

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

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

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

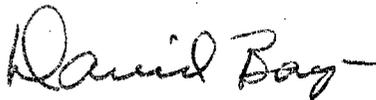
Please see the attached Table 1 and Table 2, from the recent OCD Discharge Plan renewal application for Williams' Rosa Compressor Station, for an example of how the updates apply at a typical Williams' facility. The updated information is indicated by bold text. We will update this information in each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

Five Points (GW-078)
29-6#2 (GW-121)
29-6#3 (GW-198)
29-6#4 (GS-122)
30-5 (GW-108)
31-6 (GW-118)
32-7 (GW-117)
32-8#2 (GW-111)
32-8#3 (GW-116)
32-9 (GW-091)
Aztec (GW-155)
Blanco (GW-327)
Cabresto (GW-352)
Carracas (GW-112)
Cedar Hill (GW-087)
Chaco (GW-331)
Coyote (GW-250)
Crouch Mesa (GW-129)
Culpepper (GW-353)
Decker Junction (GW-134)
Dogie (GW-330)
El Cedro (GW-149)
Glade (GW-321)
Hare (GW-343)
Honolulu (GW-315)
Horse Canyon (GW-061)
Horton (GW-323)
Kernaghan (GW-271)

La Cosa (GW-187)
Laguna Seca (GW-307)
La Jara (GW-223)
Lateral N-30 (GW-256)
Lawson Straddle (GW-322)
Lybrook (GW-047)
Manzanares (GW-062)
Martinez (GW-308)
Middle Mesa (GW-064)
Milagro (GW-060)
Navajo (GW-182)
North Crandell (GW-310)
Pipkin (GW-120)
Pritchard (GW-274)
Pump Mesa (GW-063)
Quintana Mesa (GW-309)
Richardson (GW-320)
Sims Mesa (GW-068)
Snowshoe (GW-287)
Thompson (GW-328)
Trunk A (GW-248)
Trunk B (GW-249)
Trunk C (GW-257)
Trunk L (GW-180)
Trunk M (GW-181)
Trunk N (GW-306)
Wildhorse (GW-079)

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

Respectfully submitted,



David Bays
Senior Environmental Specialist

Attachment

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

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

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

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Produced Water/Natural Gas Condensate	Inlet Scrubber, Gas Inlet Separator, Dehydrators	2000-8000 bbl/year	No Additives
Waste Water/Wash Down Water	Compressor and Dehy Skids	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
Used Oil	Compressors	500-2000 gal/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressors	50-500/year/engine	No Additives
Used Process Filters	Charcoal, Activated Carbon, Molecular Sieve	50-500 cubic yd/yr	No Additives
Used Process Filters	Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambientrol	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

Cirrus Consulting, LLC

1828 E. Harrison Ave, Salt Lake City, UT 84108

Voice Line: (801) 583-3107

ideklau@cirrusllc.com

MEMORANDUM

To: Wayne Price

From: Ingrid Deklau

Date: August 21, 2006

Subject: Williams Field Services –copies of public notice

Hi Wayne –

As we discussed on the phone Friday, here are copies of the public notice letters for four OCD Discharge Plan submittals that were made while I was on vacation. Sorry for any inconvenience there....

We also discussed the company name change from Williams Field Services to Williams Four Corners, LLC. When we prepared these plans and letters, the company was still going by Williams Field Services Company. I drafted up a letter addressed to you for review by Williams' personnel regarding the name change, and hope to get it reviewed and officially submitted to you this week. Just to reiterate, there is no change of corporate ownership involved here, and all other administrative items (environmental contact, phone numbers, etc.) remain unchanged.

I can be reached at 801-583-3107 if you have any questions.

Thanks!
Ingrid



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

July 3, 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 Pritchard Compressor Station (GW-274). 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 July 2006.

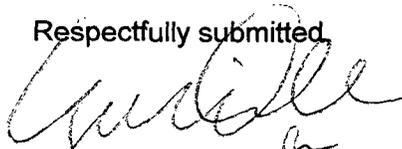
The facility, located in Section 1, Township 30 North, Range 9 West, San Juan County, New Mexico, approximately 14 miles east of Aztec, provides natural gas compression and conditioning services.

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 50 to 200 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

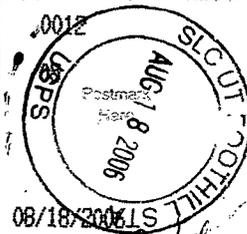
Comments or inquiries regarding this permit or the permitting process may be directed to:

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

Respectfully submitted,


 Monica Sandoval
 Environmental Compliance Administrator

959 2629 4000 0660 5002

U.S. POSTAGE		CERTIFIED MAIL PERMIT	
FARMINGTON NM 87401			
Postage	\$	\$0.39	
Certified Fee		\$2.40	
Return Receipt Fee (Enrollment Required)		\$1.85	
Restricted Delivery Fee (Enrollment Required)		\$0.00	
Total Postage & Fees	\$	\$4.64	
Sent To	BLM		
Street, Apt. No., or PO Box No.	1235 N. La Plata Hwy		
City, State, ZIP	Farmington, NM 87401		

2006 AUG 23 AM 11 44



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

August 22, 2006

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

Re: Change of Company Name

Dear Mr. Price;

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "David Bays".

David Bays
Senior Environmental Specialist

Attachments

xc: Clara Cardoza
Monica Sandoval
WFS FCA file 210



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

RECEIVED

DEC 07 2001

Environmental Bureau
Oil Conservation Division

December 7, 2001

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

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

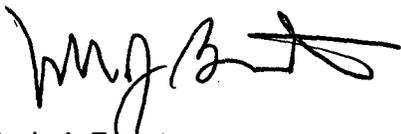
Dear Mr. Ford:

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

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

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

Sincerely;

A handwritten signature in black ink, appearing to read 'Mark J. Bareta', with a stylized flourish at the end.

Mark J. Bareta
Senior Environmental Specialist

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



October 29, 2001
AMEC Project No. 1-517-000087

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

**RE: Drain Line Testing
Williams Field Services Pritchard Compressor Station
San Juan County, New Mexico**

Dear Mr. Baretta,

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

AMEC mobilized to the site and began drain line testing activities on September 6, 2001. The work was completed on September 7, 2001. AMEC's on-site crew consisted of Bruce Hare (Site Supervisor) and a 3-man field crew.

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

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

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

Williams Field Services
Drain Line Testing-Pritchard Compressor Station
Phase 4, Task 16
October 29, 2001



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

Respectfully submitted,

AMEC Earth & Environmental, Inc.

A handwritten signature in black ink that reads "Robert Thompson". The signature is written in a cursive style with a large, prominent "R" and "T".

Robert Thompson
Project Manager

Attachments: Daily Summary of Line Testing

Copies: Addressee (3)

Hydrostatic Line Testing Form

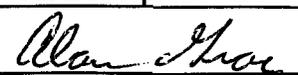


AMEC Project Number: <u>1517000064</u> Client: <u>Williams Field Services</u>	
Task: <u>16</u> Facility Name: <u>Prichard Compressor Station</u>	
Test Description: <u>Hydrostatic Pressure Test</u>	
System Description: <u>Waste Water Drain</u>	
Test Medium: <u>Water</u> Test Pressure: <u>3 PSI</u> Test Date: <u>9-6-01</u>	
<p>Test Requirements: Hydrostatic pressure test on all underground process/wastewater pipelines in accordance with the State of New Mexico, Energy, Minerals, and Natural Resources Department - Oil Conservation Division Best Management Practices minimum requirements. Perform a hydrostatic pressure test on underground process/wastewater pipelines at 3 pounds per square inch for a period of one hour.</p>	

Test Data:

Start	Stop	Pressure	Pass/Fail	Lines Tested
1525	1625	101WC 3+PSI	PASS	Tested all Area waste water drain line on this site

Review and Approvals:

 AMEC Representative Signature	Morgan Killion Printed Name	9-6-01 Date
 Client Representative Signature	ALAN GRACE Printed Name	9-6-01 Date



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

November 13, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 6917

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

**RE: Discharge Plan Renewal Approval GW-274
Williams Field Services
Pritchard Straddle Compressor Station
San Juan County, New Mexico**

Dear Mr. Baretta:

The ground water discharge plan renewal GW-274 for the Williams Field Services Pritchard Straddle Compressor Station located in the SW/4 SW/4 of Section 1, Township 30 North, Range 9 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 October 21, 1996 and approved December 17, 1996. The discharge plan renewal application, dated July 13, 2001, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. 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 nonhazardous 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.

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-274
WILLIAMS FIELD SERVICES
PRITCHARD STRADDLE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(November 13, 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 \$1,700.00. 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 renewal 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.
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 Williams Field Services' representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained 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 Pritchard Straddle Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Pritchard Straddle Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services, 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



Four Corners Area
Environmental Department
#188 CR 4900
Bloomfield, N.M. 87413
Phone: (505) 634-4956
Fax: (505) 632-4781

November 30, 2001

Water Management Quality Management Fund
c/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Dear Sir or Madam:

Enclosed please find, check number 1000388005 for \$17,000.00, to cover the fees for the following discharge plans:

Coyote Springs Compressor	GW-250	\$ 1,700.00
Trunk C Booster Station	GW-257	\$ 1,700.00
Trunk B Booster Station	GW-249	\$ 1,700.00
Lateral N-30 (Koch Gardner)	GW-256	\$ 1,700.00
32-9 CDP Compressor Station	GW-091	\$ 1,700.00
Pritchard Straddle Compressor Station	GW-274	\$ 1,700.00
Kernaghan Compressor	GW-271	\$ 1,700.00
Trunk A Booster Station	GW-248	\$ 1,700.00
Sims Mesa Compressor Station	GW-068	\$ 1,700.00
30-5 CDP Compressor Station	GW-108	\$ 1,700.00

Your assistance in processing this fee is greatly appreciated.

If you have any questions please contact me at (505) 634-4956.

Thank You,

Ethel Holiday
Environmental Compliance

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 11/29/01
or cash received on _____ in the amount of \$ 17,000.00
from See Attached List
for _____

Submitted by: [Signature] Date: 12/4/01
(Family Name) (DP No.)

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal

Modification _____ Other _____
(Agency)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

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



WILLIAMS FIELD SERVICES COMPANY
1800 South Baltimore Avenue * P.O. Box 645 * Tulsa, OK 74101-0645

TR-2322 / 719
A/C: 9401076

DATE: 11/29/2001

PAY TO THE ORDER OF:

PAY → *****\$17,000.00

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

SANTA FE
United States

NM 87504

Bank One, NA
Illinois

[Signature]

Authorized Signer

MA1353 (10/99)

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION
ATTN: ED MARTIN
1220 SO. ST. FRANCIS DRIVE
SANTA FE, NM 87505

AD NUMBER: 230858 ACCOUNT: 56689
LEGAL NO: 70189 P.O.#: 02199000249
290 LINES 1 time(s) at \$ 127.83
AFFIDAVITS: 5.25
TAX: 8.32
TOTAL: 141.40

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, Mm Weideman being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #70189 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/12/2001 and 10/12/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 12 day of October, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ Mm Weideman
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
12 day of October A.D., 2001

Notary Janet L. Montoya
Commission Expires 12/30/03



OFFICIAL SEAL
Janet L. Montoya
NOTARY PUBLIC - STATE OF NEW MEXICO
MY COMMISSION EXPIRES 12/30/03

OF PUBLICA-
TION

STATE OF NEW MEXICO
ENERGY, MINERALS
AND NATURAL RE-
SOURCE DEPARTMENT
OIL CONSERVATION DI-
VISION

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

(GW-091) Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their 32-9 CDP Compressor Station located in the NE/4 SE/4, Section 15, and NW/4 SW/4, Section 14, Township 31 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 10 gallons per day of waste water is collected in a covered above grade steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 500 feet with a total dissolved solids concentrations of approximately 300 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-271) Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Kemaghan Compressor Station located in the SW/4 NW/4, Section 29, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a covered above grade receptacle prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 570 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-274) Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Kemaghan B-8 Compressor Station located in the SE/4 SW/4, Section 39, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a covered above grade receptacle prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at

a depth of approximately 410 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 2nd day of October, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVI-
SION

LORI WROTENBERY, Di-
rector
Legal #70189
Pub. October 12, 2001

AFFIDAVIT OF PUBLICATION

Ad No. 45130

STATE OF NEW MEXICO
County of San Juan:

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

Wednesday, October 10, 2001.

And the cost of the publication is \$113.40.

Connie Pruitt

ON 10/15/01 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Timmy Beck

My Commission Expires April 02, 2004

COPY OF PUBLICATION

918

Legals

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 2nd day of October, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Ford, Jack

From: Martin, Ed
Sent: Thursday, October 04, 2001 1:04 PM
To: Santa Fe New Mexican (E-mail)
Cc: Ford, Jack; Anaya, Mary
Subject: Legal Notices

Please publish the attached legal notices, one time only, on or before Friday, October 12, 2001.

Upon publication, please send to this office:

1. Invoice. Purchase order number is **02199000249**
2. Publisher's affidavit

If you have any questions, please contact me via e-mail or (505) 476-3492.

Thank you.



Publ. Notice
GW-073.doc



Publ. Notice
GW-091,271,274.do...

Ford, Jack

From: Martin, Ed
Sent: Thursday, October 04, 2001 1:09 PM
To: Farmington Daily Times (E-mail)
Cc: Ford, Jack; Anaya, Mary
Subject: Legal Notices

Please publish the attached legal notice, one time only, on or before Friday, October 12, 2001.

Upon publication, please send to this office:

1. Publisher's affidavit.
2. Invoice. Purchase order number is **02199000251**

If you have any questions, please e-mail me or (505) 476-3492.

Thank you.



Publ. Notice
GW-091,271,274.do...

Ford, Jack

From: Ford, Jack
Sent: Tuesday, October 02, 2001 10:45 AM
To: Martin, Ed
Subject: Public Notice for GW-091, GW-271 & GW-274



091PUB.DOC

NOTICE OF PUBLICATION

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

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

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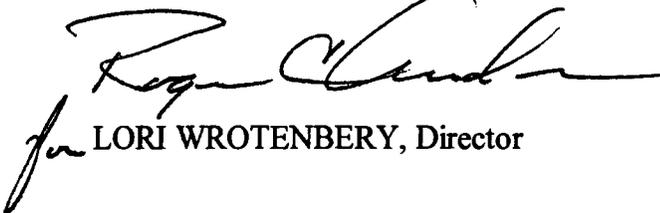
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above.

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 2nd day of October, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


for LORI WROTENBERY, Director

SEAL

OIL CONSERVATION DIV.
01 JUL 23 PM 1:06



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

July 13, 2001

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

Re: Discharge Plan Application Renewal and Filing Fee

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application renewal and check number 1000318741 for \$700.00 to cover the filling fee for the following Williams Field Services (WFS) Compressor Stations:

- Coyote Springs *GW-250*
- Kernaghan *GW-271*
- Pritchard - *GW-274*
- Trunk A - *GW-248*
- Trunk B - *GW-249*
- Trunk C - *GW-257*
- 32-9 CDP - *GW-091*

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

Thank you,

A handwritten signature in black ink, appearing to read "Clara M Garcia".

Clara M Garcia
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/11/01
or cash received on _____ in the amount of \$ 700.00

from Williams Field Services
Coyote Springs - 250 Prichard - 274 Trunk B - 249 32-9 CDP-09
for Kernaghan - 211 Trunk A - 248 Trunk C - 257

Submitted by: [Signature] Date: 7/23/01

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

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

Williams

WILLIAMS FIELD SERVICES COMPANY
1800 South Baltimore Avenue * P.O. Box 645 * Tulsa, OK 74101-0645

70-2322-1719
A/C 9401076

DATE: 07/11/2001

PAY TO THE ORDER OF:

PAY → *****\$700.00

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

SANTA FE
United States

NM 87504

[Signature]

Authorized Signer

Expires 12/17/2001

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

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999
Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

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

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

New Renewal Modification

*GW-274
Filing Fee
Paid*

1. Type: Compressor Station (Prtichard Compressor Station)

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, New Mexico 87413

Contact Person: Mark J. Baretta

Phone: (505) 632-4634

Sau Julian

3. Location: SW/4 SW/4 Section 1 Township 30 North Range 9 West
Submit large scale topographic map showing exact location.

- 4. Attach the name, telephone number and address of the landowner of the facility site.
- 5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
- 6. Attach a description of all materials stored or used at the facility.
- 7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
- 8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
- 9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
- 10. Attach a routine inspection and maintenance plan to ensure permit compliance.
- 11. Attach a contingency plan for reporting and clean-up of spills or releases.
- 12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
- 13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

14. CERTIFICATION

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

Name: Mark J. Baretta

Title: Senior Environmental Specialist

Signature: *Mark J. Baretta*

Date: *July 13, 2001*

DISCHARGE PLAN RENEWAL

PRITCHARD COMPRESSOR STATION

Williams Field Services Company

June 2001

Table of Contents

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VII.	Transfer, Storage, and Disposal of Process Fluids, Effluents, and Waste Solids-----	2
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List of Figures - All figures follow Section XI

- Figure 1 - Site Vicinity / Topographic Map
- Figure 2 - Facility Plot Plan

List of Appendices

- Appendix A – WES Spill Control Procedures
- Appendix B – NMOCD Notification of Fire, Breaks, Spills, Leaks, and Blowouts

I. TYPE OF OPERATION

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

II. LEGALLY RESPONSIBLE PARTY

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

Contact Person:

Mark J. Baretta, Senior Environmental Specialist
Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Pritchard Compressor Station is located in Section 1, Township 30 North, Range 9 West, in San Juan County, New Mexico, approximately 14 miles east of Aztec, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangle: Archuleta, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

IV. LANDOWNER

Williams Field Services is leasing the subject property from:

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

V. FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation of three 1279-hp engines. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

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

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

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

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1000-2000 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Wash-down Water	Compressor Skid	500-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Natural Gas Condensate	Scrubber, Gas Inlet Separator	100-1000 bbl/year	No additives
Used Process Filters	Air, Inlet and Fuel Gas	75- 100/year	No additives
Empty Drums / Containers	Liquid Containers	20-40/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

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

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant. 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 microrentgens per hour. If affirmed, such materials will be handled and disposed in accordance with NMOCD NORM Regulations.

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

TABLE 2
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
PRITCHARD COMPRESSOR STATION

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tanks	(3) 500 gallons	Berm	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 WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Natural Gas Condensate	Above Ground Storage Tank	200 gallon	Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Wash-down Water	Below-ground sump, vaulted	740 gallons	Dual-walled tank	Non-Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Compressor Oil	Above ground storage tanks	(3) 500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

VIII. STORM WATER PLAN

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

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

Site Assessment and Facility Controls

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

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

Best Management Practices

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

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

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

IX. INSPECTION, MAINTENANCE AND REPORTING

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

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

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

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

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

XI. SITE CHARACTERISTICS

The Pritchard Compressor Station is located approximately 14 miles east of Aztec, New Mexico. The site elevation is approximately 5,880 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 natural drainage to the east to the Pump Canyon drainage. Pump Canyon drains to the south into the San Juan River. The San Juan River, approximately 4 miles to the south of the site, is nearest down-gradient perennial source of surface water at an elevation of approximately 5,630 feet.

A review of the available hydrologic data^{1,2} for this area revealed that there are no water wells within a 1/4-mile radius of Pritchard Compressor Station. The water-bearing unit in this area is the San Jose Formation. The San Jose Formation is the youngest Tertiary bedrock unit. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 50 to 200 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 parts per million.

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

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

References

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, 2000.

XII. FACILITY CLOSURE PLAN

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

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

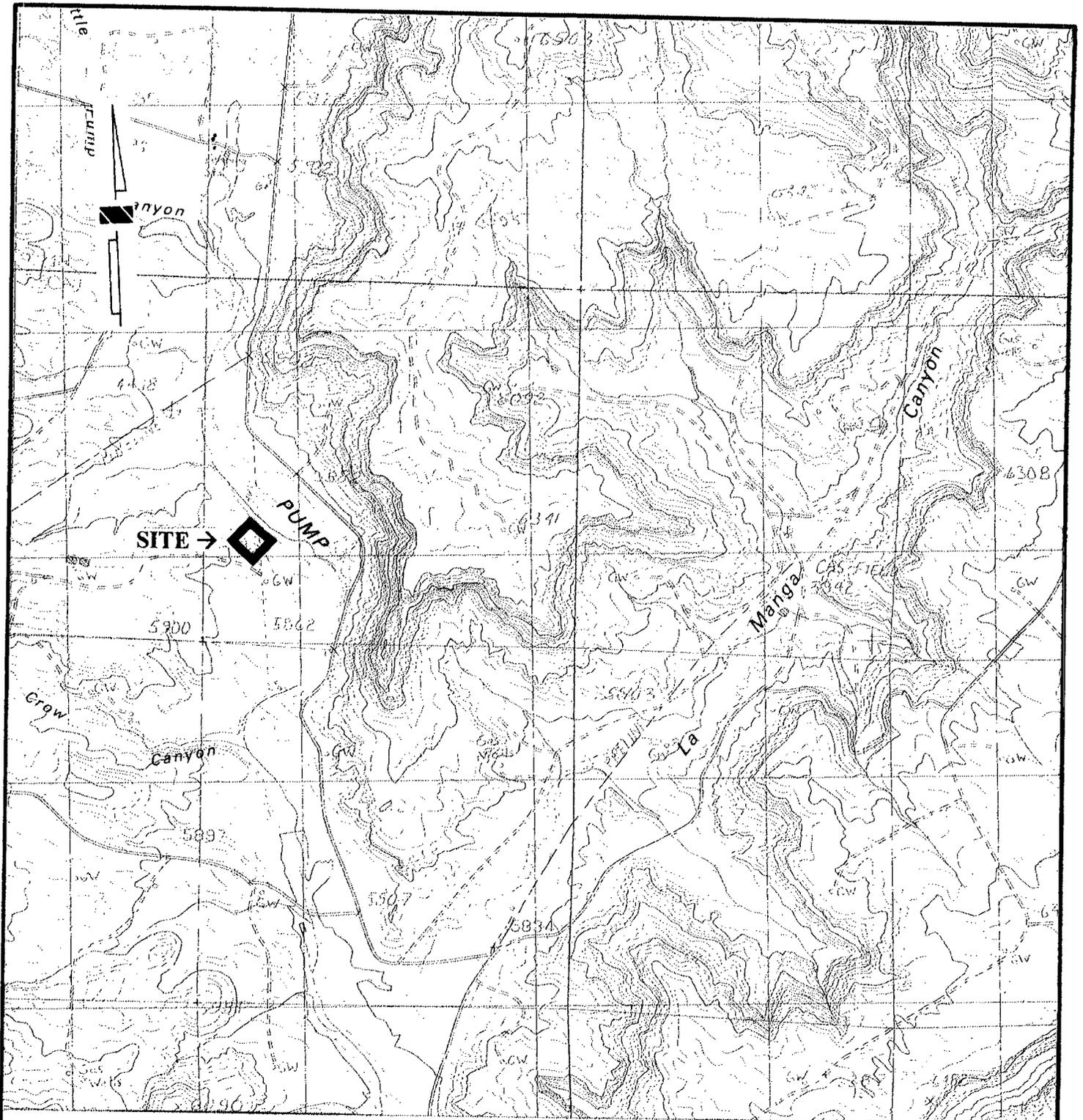
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLAN



Source: USGS Archuleta Quadrangle, New Mexico

Scale: 1" = 2,000'



Figure 1 Site Vicinity / Topographic Map
Pritchard Straddle Compressor Station
 Section 1, Township 30N Range 9W
 San Juan County, New Mexico

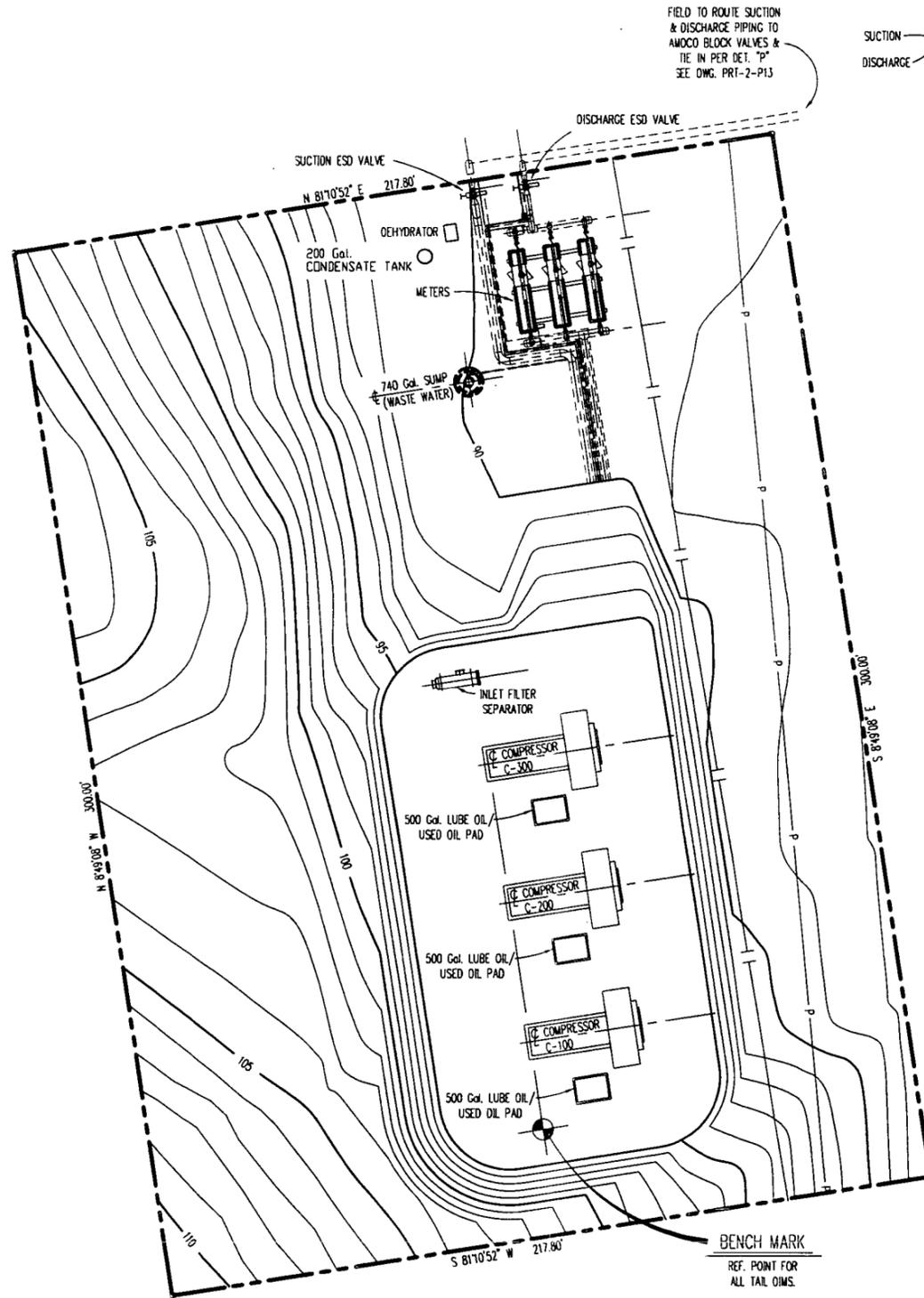
Subject or Title:

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

ATTACHMENT "A" PRODUCT AND WASTE STORAGE LOCATIONS

OPERATIONS		
Manual	PRITCHARD COMPRESSOR STATION	
Section	SPILL PREVENTION CONTROL	Tab 13 Document No. 42.13.001
Effective Date	12-4-98	Issue No. 02 Page No. 5 of 8

EXISTING AMOCO
PRODUCT TANK
(400 Bbl.)



										DRAFTING BY DATE PHM 11-10-98		STATE: NEW MEXICO COUNTY: SAN JUAN		WILLIAMS GAS PROCESSING - BLANCO <small>ONE OF THE WILLIAMS COMPANIES</small>			
										CHECKED BY PHM		PRITCHARD COMPRESSOR STATION SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN PLOT PLAN					
										APPROVED BY PHM							
										ENGINEER BY DATE PHM 11-10-98							
REVISIONS 02 12-4-98 PHM REVISED PER FIELD AS-BUILT 98408 01 11-10-98 PHM ISSUED FOR FIELD MARK-UP 98408										DESIGNED BY PHM		SCALE: 1" = 20' W.D. NO. 98408		DWG NO. PRT-1-P7		SHEET REV 1 02	
REFERENCE DRAWINGS				REFERENCE DRAWINGS													

S:\WFSDS\PM_EI\Prt\Eod\00070102.dwg Mon Mar 08 08:53:23 1999

APPENDIX A

SPILL CONTROL PROCEDURES

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

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

▶ **Document History (ISO9001)**

▼ **Document Body**

1.0 PURPOSE AND SCOPE

- 1.1 To establish the policy and procedure for preventing, controlling and reporting of discharges or spills of oil or hazardous substances to the environment in accordance with Company practices and federal, state and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
- 1.2 This document pertains to Company personnel, Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

2.0 CONTENTS

3.0 POLICY

3.1 GENERAL

- 3.1.1 All Company facilities which could discharge or spill, oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to, fish, shellfish, wildlife, shorelines and beaches are subject to the provisions of this document.
- 3.1.2 Oil, for purpose of this document, means oil of any kind or in any form, including but not limited to petroleum hydrocarbon, fuel oil, Y grade, natural gas liquids, condensate, mixed products, sludge, oil refuse and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) is not considered to be oil.
- 3.1.3 Hazardous Substance, for purposes of this procedure, is defined as any chemical or

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

- a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act
- c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
- d. Section 112 of the Clean Air Act
- e. Section 7 of the Toxic Substance Control Act

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

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

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

a. Non-Transportation Related Facilities

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

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

b. Transportation Related Facilities

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

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

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

but are not limited to, the following:

- a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
 - b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
 - c. Briefings should highlight and describe known discharges or spills and recently developed precautionary measures.
- 3.1.9 Each individual facility is checked annually by the superintendent or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.
 - b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
 - c. An annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.
- 3.1.10 Any field drainage ditches, road ditches, traps, sumps or skimmers should be inspected at regular scheduled intervals for accumulation of oil or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

3.2 BULK STORAGE TANKS

- 3.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the oil or substance stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.
- 3.2.2 The facility superintendent should evaluate tank level monitoring requirements to prevent tank overflow.
- 3.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.
- 3.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

3.3 FACILITY DRAINAGE

- 3.3.1** Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from diked areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.
- 3.3.2** Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.
- 3.3.3** When possible, drainage systems from undiked areas should flow into ponds, lagoons or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.
- 3.3.4** The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:
- a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation or displacement by foreign materials.
 - b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.
 - c. Any dike three feet or higher should have a minimum cross section of two feet at the top.
- Other means of containment or spill control include, but are not limited to:
- 3.3.5**
- a. Berms or retaining walls
 - b. Curbing
 - c. Culverting, gutters or other drainage systems
 - d. Weirs, booms or other barriers
 - e. Spill diversion ponds or retention ponds
 - f. Sorbent materials

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

- 3.4.1** Aboveground valves and pipelines should be examined regularly by operating

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

3.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

- 3.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.
- 3.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- 3.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets that may allow leakage should be tightened, adjusted or replaced to prevent liquid leakage while in transit.

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

4.0 PROCEDURE

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

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

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

1. Release reaches or may reach surface water: (pond, lake, wash or ground water)
2. Release leaves Williams property
3. Release is of questionable nature (i.e., unknown product, unknown hazards)

II. Onsite Releases of Certain Common Industrial Materials Above 10 Gallon Threshold Are Reportable.

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

- Ammonia
- Antifreeze
- Amine

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

III. Releases of Certain Other Materials Reportable:

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

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

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

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

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

- a. Name of company facility and/or location of facility and nature of discharge or spill
- b. Description and quantity of emission or substance discharged
- c. Description of the circumstances causing the discharge or spill
- d. Name, title and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
- e. Action taken or being taken to mitigate and correct discharge or spill
- f. Water bodies or streams involved
- g. Time and duration of discharge or spill

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

Gas Control Personnel

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

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

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

Facility Superintendent

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

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

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

Environmental Affairs

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

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

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

4.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Superintendent or Designee

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

a. Time and date of discharge or spill

b. Facility name and location

c. Type of material spilled

d. Quantity of material spilled

e. Area affected

f. Cause of spill

g. Special circumstances

h. Corrective measures taken

i. Description of repairs made

j. Preventative measures taken to prevent recurrence.

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

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

**ATTACHMENT A
DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS**

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

3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.

Note: Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.

C. Bulk Storage Tanks or any other Facilities

1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam or burning.

2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.

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APPENDIX B

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

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

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Form C-141
Revised March 17, 1999
Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

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

LOCATION OF RELEASE

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

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <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:	
Date:	Phone:	Conditions of Approval:	Attached <input type="checkbox"/>

* Attach Additional Sheets If Necessary



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

February 9, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0074

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

RE: Discharge Plan Renewal Notice for Williams Field Services Facilities

Dear Ms. Garcia:

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

GW-060 expires 3/21/2001 – Milagro Compressor Station
GW-233 expires 4/1/2001 – La Jara Compressor Station
GW-061 expires 6/6/2001 – Horse Canyon Compressor Station
GW-062 expires 6/6/2001 – Manzanares Compressor Station
GW-063 expires 6/6/2001 – Pump Mesa Compressor Station
GW-064 expires 6/6/2001 – Middle Mesa Compressor Station
GW-079 expires 6/21/2001 – Wild Horse Compressor Station
GW-078 expires 6/21/2001 - 5-Points Compressor Station
GW-250 expires 8/9/2001 – Coyote Springs Compressor Station
GW-249 expires 8/9/2001 – Trunk B Booster Compressor Station
GW-248 expires 8/9/2001 – Trunk A Booster Compressor Station
GW-257 expires 9/18/2001 – Trunk C Compressor Station
GW-256 expires 9/18/2001 – Koch-Gardner Compressor Station
GW-087 expires 11/27/2001 – Cedar Hill Compressor Station
GW-271 expires 12/17/2001 – Kernaghan Compressor Station
GW-274 expires 12/17/2001 – Pritchard Straddle Compressor Station
GW-273 expires 12/17/2001 – Moore Compressor Station
GW-272 expires 12/17/2001 – Kernaghan B-8 Compressor Station

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued

under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 20NMAC 6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00. After January 15, 2001 renewal discharge plans require a flat fee equal to the flat fee schedule for gas processing facilities pursuant to revised WQCC Regulations 20NMAC 6.2.3114. A copy of the revised fee schedule is included for your assistance. The \$100.00 filing fee is to be submitted with each discharge plan renewal application and is nonrefundable.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A complete copy of the regulations is also available on NMED's website at www.nmenv.state.nm.us.

If any of the above-sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services has any questions, please do not hesitate to contact Mr. Jack Ford at (505) 476-3489.

Sincerely,



Roger C. Anderson
Oil Conservation Division

cc: OCD Aztec District Office

Work Copy

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



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

September 14, 1998

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

Re: Underground Line Testing Results at various Williams Field Services Facilities

Dear Mr. Ford:

Enclosed, please find a copy of the results of the underground line testing that was performed at the Williams Field Services (WFS) facilities listed below.

Trunk C (GW-259)
Hart Mountain (GW-208)
Decker Junction (GW-134)
Aztec (GW-155)
Cedar Hill (GW-87)
Horse Canyon (GW-61)
32-7 (GW-117)

Carracas (GW-112)
32-8#3 (GW-116)
Rosa #1 (GW-292)
Manzanares (GW-62)
Simms Mesa (GW-68)
Trunk A (GW-248)
29-7 (GW-136)

30-5 (GW-108)
30-8 (GW-133)
Trunk B (GW-249)
32-9 (GW-91)
Kernaghan (GW-271)
Trunk N (GW-306)
32-8#2 (GW-111)

Also Added: Moore (GW-273) *Pritchard (GW-274)* *Kernaghan B-8 (GW-272)*

If you have any questions concerning this submittal, please call me at 801-584-6543.

Sincerely,



Ingrid Deklau
Environmental Specialist

XC: Denny Foust, NM OCD



TIME & EXPENSE REPORT

P.O. Box 40262
Houston, Texas 77240-0262
713/466-0980

REPORT NO.
13504

DATE: 2-5-97

CUSTOMER WFS

LOCATION Pritchard 64273

BILLING ADDRESS _____

ORDER NO. 11707 GW-279

PRODUCTION OPERATORS
JOB NO. 1122-2000-8278

ITEM	NAMES	CLASSIFICATION	EXPENSE	MILEAGE	TRAVEL	REG. HOURS	O.T. HOURS	TOTAL HOURS	AMOUNT	
1	MIKE JORDAN	Supr		81		8	2	10		
2										
3										
4										
5										
6										
7										
8										
9										
10										
11								✓		
12										
								10		
EQUIPMENT USED		1 4X4 P.O.							10	
								✓		
								10		

DESCRIPTION OF WORK Test PUC 2 hrs, Fals Vehicle Grounds, Pipe Supports with ISO, Pad, Backfill Sand, Trench water settles, Demolish PUC, Ditching units, Pull PUC skidlets, Install blowdown Piping, Cement Coker legs and Pipe Supports

[Handwritten Signature]

[Handwritten Signature]

Customer Approval

Supervisor

WORK ORDER # POI 50630



INVOICE NUMBER _____

INDUSTRIAL SERVICES, INC

BRANCH OFFICE:
245 NM HWY 544
BLOOMFIELD, NM 87413
(505) 632-9558
FAX (505) 632-9612

REMIT TO HOME OFFICE
P.O. BOX 614
EVANSTON, WY 82931-0614
(307) 789-4747
FAX (307) 789-4755

CHARGE TO: POI 7

DATE INVOICED:	DATE OF WORK: <u>7-5-77</u>
DUE DATE:	CUST'S ORDER #:
(T & M) CONTRACT EXTRA	
JOB NAME / NUMBER: <u>POI 50630</u>	
WORK ORDERED BY: <u>WFS-11140</u>	
JOB LOCATION: <u>Portland</u>	
STATE / COUNTY: <u>nm, San Juan</u>	
JOB COMPLETE:	YES <input type="radio"/> NO <input checked="" type="radio"/>

WORK INSTRUCTIONS: Test pipe during shift/vertical

Small pipe repair in old well. 1/2" dia. 10' deep. Test pipe for gas leaks.

EMPLOYEE	REG. HRS.	O.T. HRS.	RATE	O.T. RATE	AMOUNT	EQUIPMENT	UNIT	HRS.	RATE	AMOUNT	
Eric Lee Boy	10					3/4 ton compressor	102	10			
L. M. ...	10					1 ton compressor	300	10			
...	10					4x4 P.U.	26	10			
...	10					4x4 P.U.	12	11			
...	11					7x6 truck	775	1/2			
...	10					Rubber tire hoe	142	1/2			
...	10					tool box	800	1/2			
...	10					1/2" air compressor		4			
...	10					connector	100	2			
...	10										
...	10										
...	10										
...	10										
...	10										
							TOTAL LABOR				
							TOTAL MATERIALS				
							TOTAL EQUIPMENT				
							FREIGHT COST				
							TAX				
							TOTAL				
MATERIAL	QTY.	UNIT	UNIT COST	AMOUNT							
					SUPERVISOR'S SIGNATURE: <u>M. L. Boy</u>						
					CUSTOMER SIGNATURE: <u>[Signature]</u>						
					I HEREBY ACKNOWLEDGE THE SATISFACTORY COMPLETION OF THE ABOVE DESCRIBED WORK.						

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 12/30/96

or cash received on _____ in the amount of \$ 1380.00

from WFS

for Pritchard Straddle C.S. GW-274

Submitted by: _____ Date: _____
(Facility Name) (DP No.)

Submitted to ASD by: R. Anderson Date: 1-24-97

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility Renewal _____
Modification _____ Other _____

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

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

Chase Manhattan Bank Delaware
1201 Market Street
Wilmington DE 19801
62-26 5736-09
311

DATE	CHECK NO.	NET AMOUNT
12/30/96	[redacted]	1380.00

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

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

Williams Field Services Company
James Hill
VICE PRESIDENT
AUTHORIZED REPRESENTATIVE



Williams Field Services Company

2289 NMED-WATER QUALITY MANAGEMENT

12/30/96

INVOICE NUMBER	DESCRIPTION	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
P288258733	PRITCHARD STRADDLE	12/17/96	1380.00	0.00	1380.00
			1380.00	0.00	1380.00

PLEASE DETACH BEFORE DEPOSITING

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

1996

RECEIVED

JAN - 2 1997

Environmental Bureau
Oil Conservation Division

December 31, 1996

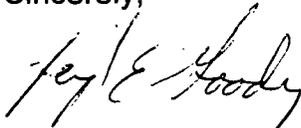
Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Re: Discharge Plans Fee - San Juan County
Kernaghan Compressor Station GW-271
Kernaghan B-8 Compressor Station GW-272
Moore Compressor Station GW-273
Pritchard Straddle Compressor Station GW-274

Dear Mr. Anderson:

Enclosed, please find the signed Conditions of Approval and payment to cover the discharge plan fees for the above referenced Williams Field Services Company facilities. If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,



Leigh E. Gooding
Sr. Environmental Specialist

enclosure

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 11/6/96
or cash received on _____ in the amount of \$ 200.00

from Environmental Services for W.F.S.
for Kernaghan C.S. GW 271 / Moore C.S. GW 273
Kernaghan B-B C.S. GW 272 / Fulcher Straddle C.S. GW 2

Submitted by: _____ Date: _____
Submitted to ASD by: [Signature] Date: 12/11/96
Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal _____
Modification _____ Other _____
(Specify)

Organization Code 521.07 Applicable FY 97

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

ENVIRONMENTAL SERVICES, INC.
4665 INDIAN SCHOOL RD. NE, STE. 106 PH. 266-6611
ALBUQUERQUE, NM 87110

DATE 11-6-96 95-32/1070
0109676338

PAY TO THE ORDER OF NM Water Quality Management Fund \$ 200.00
Two hundred and no/100 DOLLARS

SUNWEST
SUNWEST BANK OF ALBUQUERQUE, N.A.
ALBUQUERQUE, NEW MEXICO 87125-0500 (505) 785-2800

MEMO _____ [Signature] _____

[redacted]



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

December 17, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-733

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-274
Pritchard Straddle Compressor Station
San Juan County, New Mexico**

Dear Ms. Gooding:

The discharge plan GW-274 for the Williams Field Services Pritchard Straddle Compressor Station located in SW/4 SW/4, Section 1, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated October 21, 1996, from Williams Field Services and this approval letter with conditions of approval from OCD dated December 17, 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 ten 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.

Ms. Leigh Gooding
Williams Field Services
GW-274
December 17, 1996
Page 2

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.

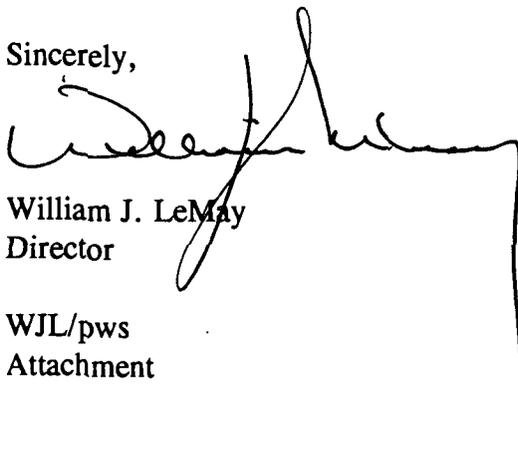
Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. This approval will expire December 17, 2001, and an application for renewal should be submitted in ample time before that date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval.

The discharge plan for the Williams Field Services Pritchard Straddle Compressor Station GW-274 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

P 288 258 733

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

Sent to WFS - Gooding	
Street & Number GW-274	
Post Office, State, & ZIP Code SP APR.	
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
GW-274
December 17, 1996
Page 3

ATTACHMENT TO DISCHARGE PLAN GW-274
Williams Field Services - Pritchard Straddle Compressor Station
DISCHARGE PLAN REQUIREMENTS
(December 17, 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 October 21, 1996, from Williams Field Services and this approval letter with conditions of approval from OCD dated December 17, 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.
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.

Ms. Leigh Gooding
Williams Field Services
GW-274
December 17, 1996
Page 4

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 soils contaminated with a non-exempt waste 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. **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.

14. **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 Oil Conservation Division for good cause shown as necessary to protect groundwater, human health and the environment.

Accepted:

Williams Field Services

by _____
Title

RECEIVED

NOV 26 1996

AFFIDAVIT OF PUBLICATION

No. 37134

Environmental Bureau
Oil Conservation Division

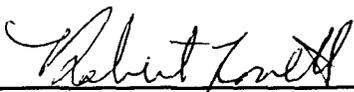
COPY OF PUBLICATION

STATE OF NEW MEXICO
County of San Juan:

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

Friday, November 15, 1996;

and the cost of publication is: \$115.68.



On 11/15/96 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.



My Commission Expires May 17, 2000

Legals



NOTICE OF PUBLICATION

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

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

(GW-033) - Western Gas Resources, Inc., Mr. James Fleak, (303)-452-5603, 12200 N. Pecos Street, Denver, CO, 80234-3439, has submitted a Discharge Plan Renewal Application for their "San Juan River" Gas Plant located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. Plant process waste water is discharged to a double lined surface evaporation pond, designed with a primary liner leak detection system. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 10 feet with a total dissolved solids concentration of approximately 4,500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-271) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan" compressor station located in the SW/4 NW/4, Section 29, Township 31 North, Range 8 West NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 570 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-272) - Williams Field Service, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan B-8" compressor station located in the SE/4 SW/4 of Section 33, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 410 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-273) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Moore" compressor station located in the NE/4 SW/4, Section 9, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 210 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-274) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Pritchard Straddle" compressor station located in the SW/4 SW/4, Section 1, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 40 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 5:00 p.m. on business days.

NEW MEXICO OIL CONSERVATION
ATTN:SALLY MARTINEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER:578341

ACCOUNT:56689

LEGAL NO: 60737

P.O. #:96199002997

341 LINES once at \$ 136.40

Affidavits: 5.25

Tax: 8.35

Total: \$ 150.50

AFFIDAVIT OF PUBLICATION

RECEIVED

NOV 18 1996

Environmental Bureau
Oil Conservation Division

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 60737 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 13th day of NOVEMBER 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
13th day of NOVEMBER A.D., 1996



OFFICIAL SEAL

Candace C. Ruiz

NOTARY PUBLIC - STATE OF NEW MEXICO

My Commission Expires: 9/29/99

Candace C. Ruiz

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

**ENERGY, MINERALS
AND NATURAL
RESOURCES
DEPARTMENT**

**OIL CONSERVATION
DIVISION**

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

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(GW-271) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan" compressor station located in the SW/4 NW/4, Section 29, Township 31 North, Range 3 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 570 feet with a

total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-272) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan B-8" compressor station located in the SE/4 SW/4, Section 33, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 410 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-273) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for the "Moore" compressor station located in the NE/4 SW/4, Section 9, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 210 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-274) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Pritchard Straddle" compressor station located in the SW/4 SW/4, Section 5, Township 30 North, Range 9 West, NMPM, San Juan

County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 40 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of November 1996.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director
Legal #60737
Pub. November 13, 1996

RECEIVED

NOV 18 1996

Environmental Bureau
Oil Conservation Division

Pat Sanchez

From: Denny Foust
Sent: Friday, November 08, 1996 9:48 AM
To: Pat Sanchez
Subject: WFS NEW COMPRESSOR APPLICATIONS

NOVEMBER 8, 1996

I DON'T SEE ANY PROBLEMS WITH THE GENERAL FORMAT. I DON'T THINK WE CAN CLASSIFY ALL MIXED WASTE STREAMS AS NON-HAZARDOUS BASED ON THE TEST SUBMITTED--NEEDS MORE TESTING TO GRANT A RECOGNITION OF NON HAZARDOUS STATUS DUE TO KNOWLEDGE OF PROCESS. THE PRITCHARD STRADDLE COMPRESSOR IS LOCATED NEAR A GAS SEEP IN PUMP CANYON, CURRENTLY I AM IN CONTACT WITH LEIGH GOODING ABOUT THIS POTENTIAL PROBLEM.

Pat Sanchez

From: Denny Foust
Sent: Friday, November 08, 1996 7:28 AM
To: Pat Sanchez
Subject: Registered: Denny Foust

Your message

To: Denny Foust
Subject: DISCHARGE PLAN APPLICATIONS
Sent: 11/7/96 11:25:00 AM

was read on 11/8/96 7:28:00 AM

Pat Sanchez

From: Pat Sanchez
Sent: Thursday, November 07, 1996 11:25 AM
To: Denny Foust
Subject: DISCHARGE PLAN APPLICATIONS
Importance: High

MR. FOUST, I HAVE RECEIVED 4 NEW PERMIT APPLICATIONS FOR WFS, THEY ARE : KERNAGHAN GW-271, KERNAGHAN B-8 GW-272, MOORE GW-273, AND PRITCHARD STRADDLE GW-274. AND THE RENEWAL FROM WEST. GAS FOR GW-033 "SAN JUAN RIVER" GAS PLANT.

PLEASE REVIEW THE ABOVE LISTED APPLICATIONS AND SUBMIT YOUR COMMENTS BY E-MAIL BY

TUESDAY MORNING NOVEMBER 12, 1996 BY 8:30 AM.

THANKS!!!!!!

NOTICE OF PUBLICATION

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

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

(GW-033) - Western Gas Resources, Inc., Mr. James Fleak, (303)-452-5603, 12200 N. Pecos Street, Denver, CO, 80234-3439, has submitted a Discharge Plan Renewal Application for their "San Juan River" Gas Plant located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. Plant process waste water is discharged to a double lined surface evaporation pond, designed with a primary liner leak detection system. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 10 feet with a total dissolved solids concentration of approximately 4,500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-271) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan" compressor station located in the SW/4 NW/4, Section 29, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 570 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-272) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan B-8" compressor station located in the SE/4 SW/4, Section 33, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 410 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-273) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Moore" compressor station located in the NE/4 SW/4, Section 9, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most

likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 210 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

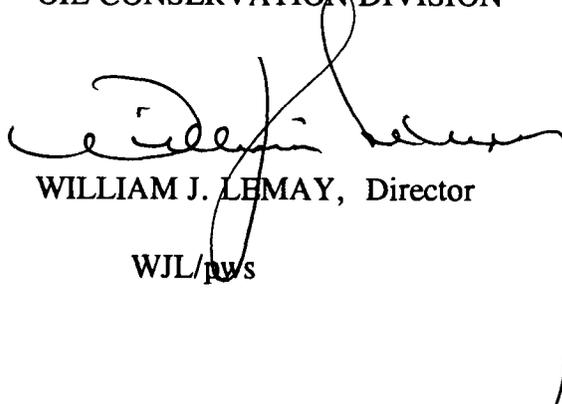
(GW-274) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Pritchard Straddle" compressor station located in the SW/4 SW/4, Section 1, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 40 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of November, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

WJL/pws

S E A L

6w-274

Application for Groundwater Discharge Plan

Pritchard Straddle Compressor Station

Manzanares Gathering System

RECEIVED

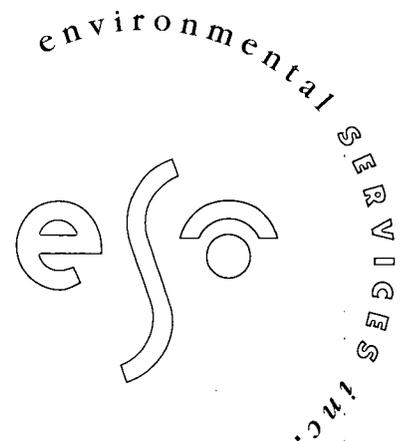
NOV 07 1996

Environmental Bureau
Oil Conservation Division

prepared for

Williams Field Services Company

November 1996



4665 INDIAN SCHOOL NE
SUITE 106
ALBUQUERQUE
NEW MEXICO
87110



November 6, 1996

Roger Anderson, Bureau Chief
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

EW-274

Subject: Discharge Plan Applications, Kernaghan, Kernaghan B-8, Moore, Pritchard Straddle
Compressor Stations, San Juan County, NM,

Dear Mr. Anderson

On behalf of our client, Williams Field Services, I am enclosing two copies of four groundwater discharge plan applications for the Kernaghan, Kernaghan B-8, Moore, Pritchard Straddle Compressor Stations. A check for \$200.00 (\$50 fee for each application) is also enclosed. If you have any questions, please don't hesitate to contact me or Leigh Gooding at (808) 584-6543.

Sincerely

Robin K. DeLapp

Robin K. DeLapp
Environmental Scientist

cc: Leigh Gooding, Williams Field Services Company
Denny Foust, OCD Aztec

4665 INDIAN SCHOOL NE

SUITE 106

ALBUQUERQUE

NEW MEXICO

87110

PHO 505 266 6611

Application for Groundwater Discharge Plan

Pritchard Straddle Compressor Station
Manzanares Gathering System

prepared for
Williams Field Services Company
November 1996

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

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

Revised 12/1/95

Submit Original
Plus 1 Copies
to Santa Fe
1 Copy to appropriate
District Office

6W-274

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS
(Refer to the OCD Guidelines for assistance in completing the application)

New

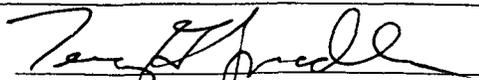
Renewal

Modification

1. Type: Pritchard Straddle Natural Gas Compressor Station
2. Operator: Williams Field Services Company
Address: 295 Chipeta Way, P.O. Box 58900, Salt Lake City, Utah 84158
Contact Person: Ms. Leigh Gooding Phone: (801) 584-6543
3. Location: SW /4 SW /4 Section 1 Township 30 North Range 9 West
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION

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

NAME: Terry G. Spradlin Title: Manager, Environment Health & Safety

Signature:  Date: 10-21-96

I. TYPE OF OPERATION

The Pritchard Straddle Compressor Station will provide metering and compression services to various producers for the gathering of coal seam natural gas on a contract basis for ultimate delivery to Williams Field Services (WFS) Milagro Plant in Bloomfield, New Mexico.

II. LEGALLY RESPONSIBLE PARTY

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

Contact Person:

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

III. LOCATION OF DISCHARGE

The Pritchard Straddle Compressor Station is located in the SW/4 of the SW/4 of Section 1, Township 30 North, Range 9 West, in San Juan County, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangle: Archuleta, New Mexico) as Figure 1. The site for this station will be 1.33 acres. The site boundary survey is provided in Figure 2. The facility layout is presented in Figure 3.

IV. LANDOWNER

Williams Field Services is leasing the subject property from:

Bureau of Land Management
1235 N. La Plata Highway
Farmington, NM 87401
(505) 599-6332

V. FACILITY DESCRIPTION

Three (3) Waukesha L 7042 G natural gas reciprocating engines, site rated at 1279 horsepower (hp) each, will be installed at the site. The units are skid-mounted and self-contained. This facility is classified as a field compressor station; consequently, there are no formal office or other support facilities not essential to field compression.

VI. SOURCES, QUANTITIES AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

The sources, quantities and quality of effluent and waste solids generated at the compressor station are summarized in Table 1. Material Safety Data Sheets for lube oil used in the equipment were previously provided to New Mexico Oil Conservation Division (NMOCD) by WFS. Lube oil will be stored at the facility in a 500-gallon elevated steel tank. For reference, representative samples of washdown wastewater and used motor oil have previously been collected from representative WFS compressor stations and analyzed for the parameters listed below.

<u>Sample</u>	<u>Parameters</u>
Washdown Wastewater	pH, TDS, TOX, TPH, BTEX, As, Ba, Cd, Cr, Pb, Hg, Se, Ag
Used Motor Oil	As, Cd, Cr, Pb, TOX, Flash Point

The results of previous tests conducted on similar waste streams showed that the washdown water did not exhibit any of the hazardous characteristics and the used motor oil was suitable for recycling (Appendix 1). Additional chemicals listed in WQCC 1101.TT and 3103 are not expected to be present in any process fluids or in the gas transported at the Pritchard Straddle Compressor Station.

Used oil filters have been collected from representative WFS compressor stations and analyzed for TCLP Metals. The results of the analysis found that the filters did not exceed TCLP concentrations for metals. The analyses were submitted to the San Juan County Regional Landfill along with the Waste Acceptance Profiles. These profiles are updated every two years or as required by the landfill.

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

Used motor oil is collected in a closed-piping system to a 500-gallon above-ground steel storage tank and transported by an EPA-registered used oil marketer (D&D Oil, EPA ID# NMD986682102).

All liquids from the station inlet filter separator and the three skid-mounted suction scrubbers and fuel filter separators are collected separately in a 400-barrel (bbl) above-ground storage tank located on an existing Amoco Production facility. The liquids are transported by Triple S Trucking Company and disposed at Basin Disposal. Washdown wastewater from engine deck plates will be collected in a closed-piping system directly to a below-grade sump. The sump will be a 740-gallon, fiberglass, double-wall tank, equipped with leak detection. Wastewater accumulations will be removed from the inner tank using a vacuum truck and transported to an NMOCD-approved surface disposal facility. A schematic drawing of the sump is presented in Figure 4.

Used oil filters are drained, stored in 50-gallon plastic drums, and transported by Waste Management of Four Corners to the San Juan County Regional Landfill.

VIII. EFFLUENT AND WASTE SOLIDS DISPOSAL

Exempt and non-exempt wastes are managed separately. Only exempt wastes are disposed down Class II injection wells. Non-exempt wastes are characterized for hazardous constituents.

- * Used motor oil is recycled by an EPA-registered used oil marketer (D&D Oil, EPA ID# NMD986682102).
- * Natural gas liquids from the separators and scrubbers are disposed at Basin Disposal.
- * Washdown water has been shown to be non-hazardous and as such, is disposed at an NMOCD-approved surface disposal facility.
- * Porta-pottys present at the facility are serviced under a contract requiring proper sewage disposal in accordance with applicable laws and regulations.
- * Used oil filters are disposed at the San Juan Regional Landfill. Current Waste Acceptance Profiles are on file at the landfill.

TABLE 1
 SOURCES, QUANTITIES AND QUALITY OF EFFLUENT AND WASTE SOLIDS
 PRITCHARD STRADDLE COMPRESSOR STATION

PROCESS FLUID/WASTE	SOURCES	QUANTITY	QUALITY	DISPOSITION
Used oil	Compressors	375 gal/yr	Used motor oil w/no additives	Collected separately in 500-gal AST at each compressor. Transported to D&D Oil for recycling.
Natural Gas Liquids	Station inlet filter separator Suction scrubbers Filter separators	500 gal/yr	No additives	Collected separately in 400-bbl AST. Transported by Triple S to Basin Disposal.
Washdown Water	Compressors	500 gal/yr	Soap and tap water w/traces of used oil	Collected in a below-grade tank. Transported to NMOCD-approved surface disposal facility for disposal.
Oil Filters	Compressors	30/yr	No additives	Drained and placed in 55-gallon plastic drums. Transported to the San Juan County Landfill for disposal.

IX. INSPECTION, MAINTENANCE AND REPORTING

Production Operators, Incorporated (POI) is under contract to operate and maintain the compression units at the facility. The facility is inspected several times per week at a minimum and a POI operator is on call 24 hours per day, 7 days per week, 52 weeks per year. The facility is remotely monitored for equipment malfunctions. POI must comply with WFS' spill response procedures. In the event of a release of a reportable quantity, POI will immediately notify WFS' Environmental Service Department and WFS will report the release to the NMOCD. The below-grade wastewater tank (sump) is monitored monthly for leak detection.

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

For overflow containment, lube oil/waste oil tanks on saddle racks are underlain by concrete splash aprons equipped with retainment curbs. Fluids which collect within the curbed area drain through a pipe into a closed containment system. A drip pan is placed beneath the catwalk adjacent to the oil filter on each compressor unit to contain spillage during maintenance activities. Spill containment dikes around the bulk storage tanks will contain 1-1/3 volume of the largest vessel. Spill containment will also be provided around the tank loading valves. Surface runoff within the site is diverted around facility processes into the natural drainage path to the east.

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

WFS corporate policy and procedures for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances are provided in Appendix 2. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1203 using the NMOCD form (see Appendix 3).

XI. SITE CHARACTERISTICS

The Pritchard Straddle Compressor Station is located in the SW/4 of the SW/4 of Section 1, Township 30 North, Range 9 West, San Juan County, New Mexico approximately 5 kilometers north-northeast of Archuleta, New Mexico. The site elevation is approximately 5880 feet above mean sea level. The undeveloped site is covered by grass and scattered pinyon and juniper.

Hydrologic Features: The site is located along a dirt road approximately 1000 feet west of Pump Canyon. The site is underlain by alluvial and eolian material over a thick layer of sandstones and shales of the San Jose Formation. Surface runoff from the area surrounding the site is diverted around the yard and to the south/southeast. Runoff continues to an ephemeral stream in the Pump Canyon drainage located 1000 feet east-southeast of the site.

A review of the well records on file with the State Engineer's Office revealed one

groundwater well within a one-quarter mile radius of the site (Appendix 4). A review of the available hydrologic data¹ for this area revealed that the closest documented source of groundwater downgradient of the subject site appears to be the Pump Canyon drainage. Groundwater within the alluvial deposits of the ephemeral stream channel in the canyon is expected to have a total dissolved solids (TDS) concentration of approximately 2000 mg/l. Based on the elevation of Pump Canyon (5840 feet), the depth to groundwater at the site is approximately 40 feet below ground surface.

Flood Protection: Stormwater runoff from the area surrounding the site is diverted around the facility into a natural drainage path.

XII. FACILITY CLOSURE PLAN

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

Generally, closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potentially toxic pollutants will be inspected. 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.

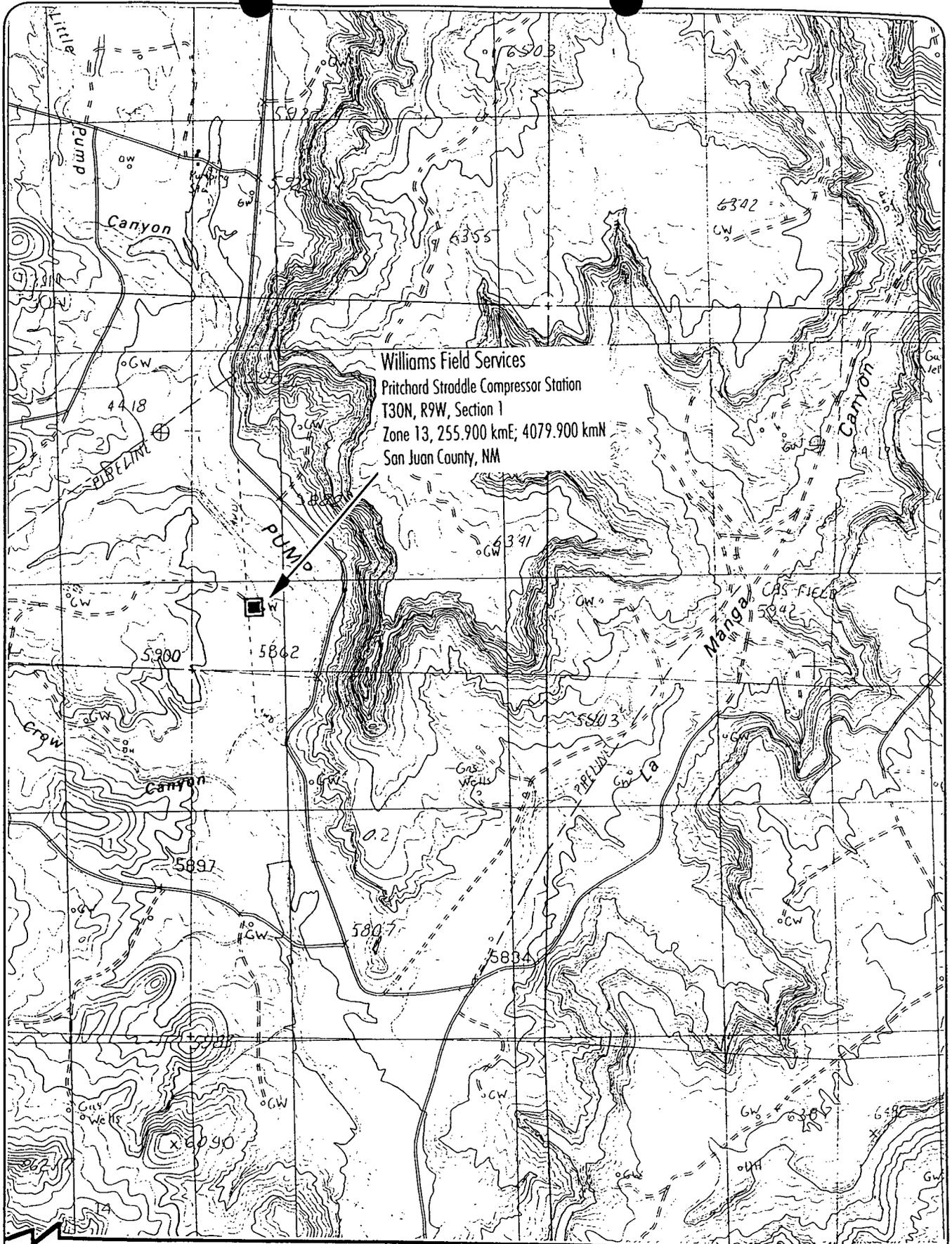
Keetch, C. W. "Soil Survey of San Juan County, New Mexico, Eastern Part", U.S. Department of Agriculture in cooperation with U.S. Department of the Interior, Bureau of Indian Affairs, Bureau of Reclamation, and the New Mexico Agricultural Experiment Station, 1980.

Klausing, R.L. and G.E. Welder, "Availability of Hydrologic Data in San Juan County, New Mexico", USGS Open-file Report 84-608, 1984.

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

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

FIGURE 1
SITE LOCATION MAP



Williams Field Services
 Pritchard Straddle Compressor Station
 T30N, R9W, Section 1
 Zone 13, 255.900 kmE; 4079.900 kmN
 San Juan County, NM



Location of Facility

Archuleta, N. Mex. 7.5-Minute Quadrangle

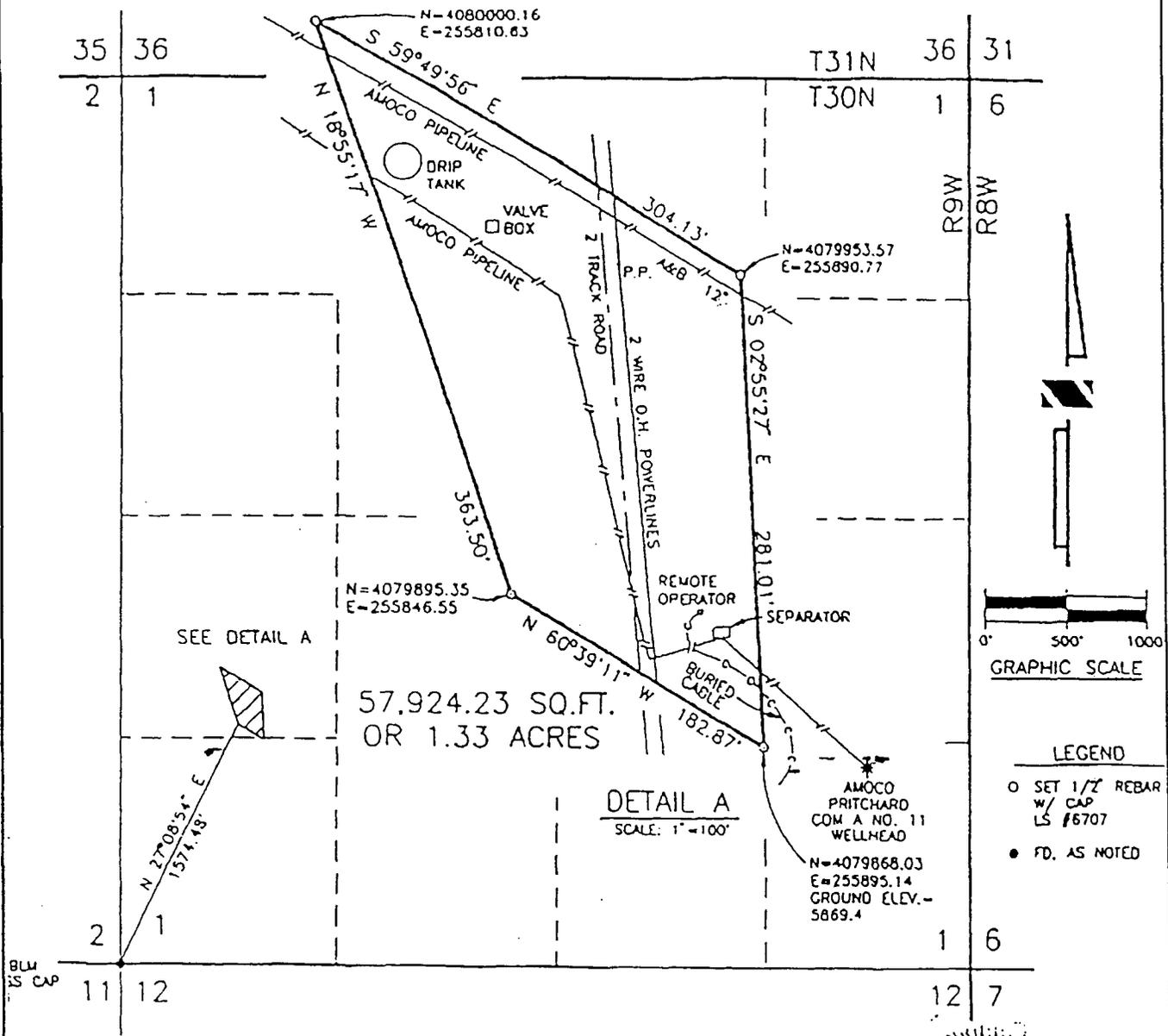
FIGURE 2
SITE SURVEY PLAN

MANZANARES CATHERING SYSTEM

WILLIAMS FIELD SERVICES

LINE AMOCO PRITCHARD STRADDLE COMPRESSOR STATION SITE
 FROM _____
 COUNTY SAN JUAN STATE NEW MEXICO
 SECTION 1 TOWNSHIP 30-N RANGE 9-W

SCALE: 1" = 1000'
 DWC NO. _____
 DRAWN BY: P.B. DATE 3/09/95
 CHECKED BY: L.M.T. SURVEYED 3/10/95
 APPROVED: _____ W.D. NO. _____
 APPROVED: _____ R/W NO. _____



NOTE: BEARINGS SHOWN ARE BASED UPON A SOLAR OBSERVATION TAKEN ALONG THE SOUTH PROPERTY LINE BEARS: S 60°39'11" E

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

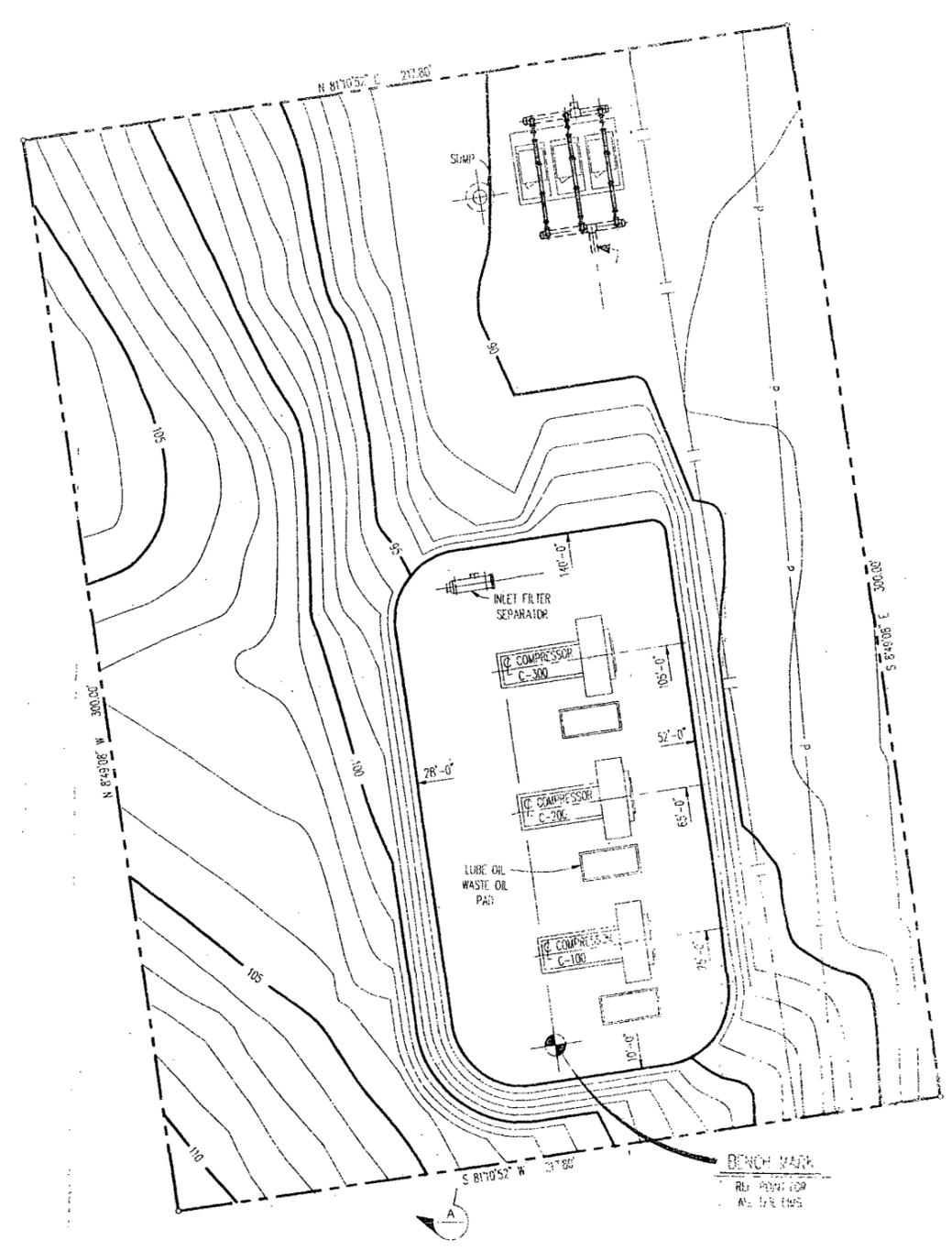
CERTIFICATE OF SURVEY
 I HEREBY CERTIFY THAT THIS PLAT IS A TRUE REPRESENTATION OF A SURVEY MADE BY ME OR UNDER MY DIRECT SUPERVISION, AND THE SAME IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.
 HARVEY D. PETERSON
 NEW MEXICO, LS 18707



Site Survey

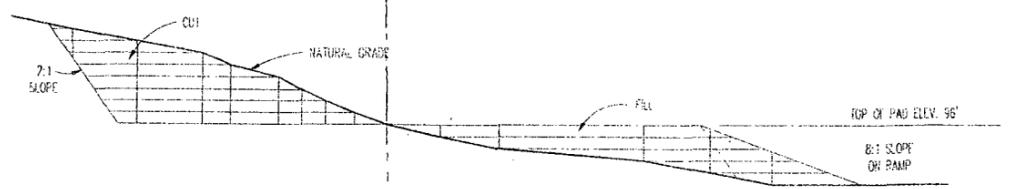
Williams Field Services—Pritchard Straddle Compressor Station

FIGURE 3
FACILITY PLOT PLAN



SUCCTION
DISCHARGE

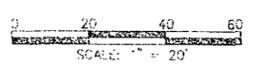
COMPENSATE &
WASTE WATER
STORAGE TANK



PROFILE "A"
VERTICAL SCALE EXPANDED 3:1

- NOTES:
1. EXCAVATION AREA SHOWN IS AN APPROXIMATE AREA REQUIRED, AND MAY BE ADJUSTED AS REQUIRED BY ACTUAL FIELD CONDITIONS.
 2. DRAINAGE AND SAFETY DAMS ARE TO BE CONSTRUCTED AS REQUIRED AFTER FINAL EXCAVATION AND GRADING IS COMPLETE.

AREA = 65,100.0 Sq.Ft.
OR 1.500 ACRES



DWG. NO.	DESCRIPTION	NO.	DATE	BY	REVISION
	REFERENCE DRAWINGS				

DRAFTING	BY	DATE
DRAWN	BY	DATE
CHECKED		
APPROVED		
ENGINEERING	BY	DATE
C & S REVIEW		
PROJECT APPROVED		
PLOT DATE/TIME	10/31/1990 1:07 PM	

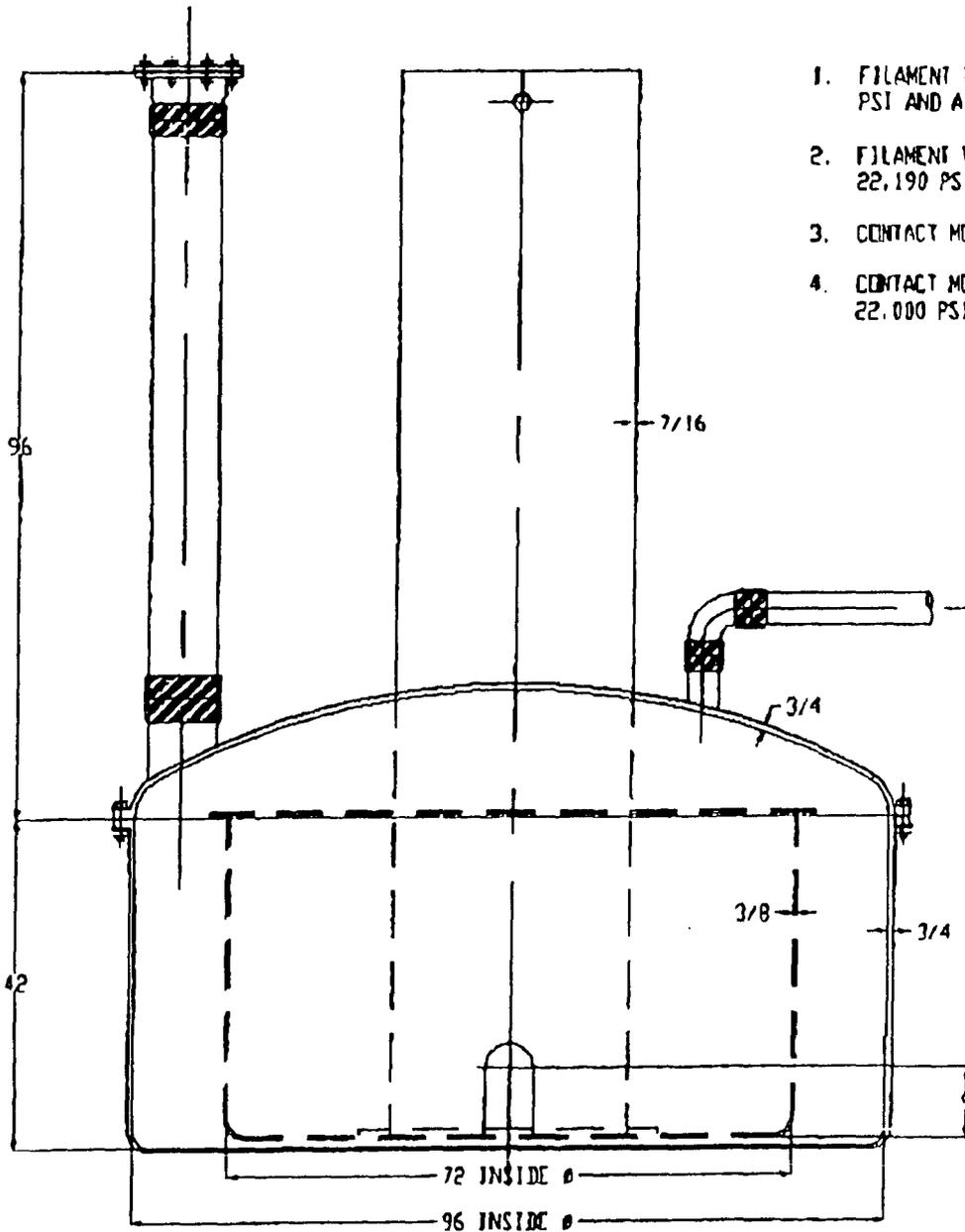
WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

**TORRE ALTA GATHERING SYSTEM
PRITCHARD COMPRESSOR SITE
EXCAVATION & SITE LAYOUT**

DWG. NO. PRT-1-M1

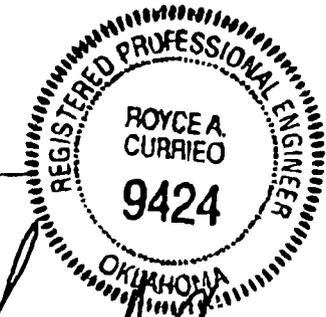
FIGURE 4

BELOW-GRADE WASTEWATER SUMP



NOTES

1. FILAMENT WOUND LAMINATE TO HAVE A FLEXURAL MODULUS OF 1,000,000 PSI AND A TENSILE MODULUS OF 1,800,000 PSI.
2. FILAMENT WOUND LAMINATE TO HAVE AN ULTIMATE FLEXURAL STRENGTH OF 22,190 PSI, AND AN ULTIMATE TENSILE STRENGTH OF 18,500 PSI.
3. CONTACT MOLDED LAMINATE TO HAVE A FLEXURAL MODULUS OF 1,000,000 PSI.
4. CONTACT MOLDED LAMINATE TO HAVE AN ULTIMATE FLEXURAL STRENGTH OF 22,000 PSI AND AN ULTIMATE TENSILE STRENGTH OF 15,000 PSI.



Royce A. Currie

PERMIAN TANK MFG. Inc.	
P. O. BOX 4438 DALLAS, TEXAS 75270	TEL (915) 983-3700 FAX (915) 533-3422
8' Ø DOUBLE CONTAINMENT TANK	
DESIGNED BY CURRIE	REVISION BY
DATE 9-7-96	DATE
FOR PROJECT WILLIAMS GAS PROC.	ISSUE NO.
SCALE DWG STD-1-0-4042	
REVISION	
DATE OF REVISION	



Load Analysis for Tank Described on DWG # STD-D-1-4042

VERTICAL BEARING LOAD OF SOIL PACKED TO 95% PROCTOR DENSITY: 145

LATERAL BEARING LOAD COEFFICIENT PER UNIFORM BUILDING CODE, TABLE 29-B:

LATERAL BEARING LOAD: 36.25 LBS/FT²/FOOT OF DEPTH

VERTICAL BEARING LOAD ON THE TANK DOME: 7.55 psi

FROM ASME RTP-1, PARA. 3A-320

DESIGNING FRP TANK DOMES TO CONSTRAIN EXTERNAL PRESSURE

$$P_a = 0.36(E/F)(\sqrt{R_o})^{-2}$$

WHERE: P_a = EXTERNAL BEARING PRESSURE (7.55 psi)
E = FLEXURAL MODULUS (1,000,000 psi PER CUSTOMER DWG #STD-D-1-4042)
F = SAFETY FACTOR (USUALLY 10)
 R_o = RADIUS OF THE TANK (48")
t = REQUIRED DOME THICKNESS inches

$$P_a = 7.55$$

$$(\sqrt{R_o})^{-2} = 7.55 / (.36 * (1000000 / 10))$$

t = 0.695 inches

The specified dome thickness of 3/4" is adequate

EXTERNAL PRESSURE BEARING ON THE OUTER TANK

Ref: ASME RTP-1 PARA. 3A-310

BURIAL DEPTH = 8' TO 11' 6"

MAXIMUM EXTERNAL PRESSURE DUE TO SOIL BEARING LOADS

PRESSURE = LATERAL BEARING LOAD AT 11.5 FEET

$$P = 36.5 \times 11.5 / 144$$

$$P = 2.915 \text{ psi}$$

Specified Wall Thickness = 1/2

Per 3A-310 calculate L/D_o $L/D_o = 3.5/8 = 0.4375$

$$\text{Calculate } 1.73(D_o/.5)^{-2} \quad 66459.68$$

Load Analysis for Tank Described on DWG # STD-D-1-4042

Use the second equation in 3A-310

$$P_a = 2.6(E/F)((\sqrt{D_o})^{2.5})/[L/D_o - 0.45(\sqrt{D_o})^{.5}] \quad \text{where } t = 1/2$$

$$P_a = 1.105 \text{ psi}$$

Note: If a 1/2" wall thickness is used the Safety Factor will be 3.5

If a 3/4" in thick wall is used for the external tank then

$$P_a = 2.6(E/F)((\sqrt{D_o})^{2.5})/[L/D_o - 0.45(\sqrt{D_o})^{.5}] \quad \text{where } t = 3/4$$

$$P_a = 3.045 \text{ psi}$$

A Wall Thickness of 3/4" for the External Tank Will Constrain the External Bearing Loads with a Safety factor of 10

Calculate Required Wall Thickness for the 30" Dia Riser

Lateral Bearing Pressures on the Riser at 7' 6" Burial Depth

$$P_a = 1.888 \text{ psi}$$

Wall Thickness = 3/8" per Customer's Dwg # STD-1-D-4042

$$P_a = 2.6(E/F)((\sqrt{D_o})^{2.5})/[L/D_o - 0.45(\sqrt{D_o})^{.5}] \quad \text{where } t = 3/8 \text{ and } D_o = 30$$

$$P_a = 1.540 \text{ psi} - \text{which is less than the Design Pressure of 1.888 psi}$$

If Wall Thickness = 7/16 (0.438) inches then:

$$P_a = 2.273 \text{ psi} - \text{which will satisfy the Design Requirements with a Safety Factor greater than 10}$$

Determine the Req'd Wall Thickness of the Outer and Inner Tanks to Constrain the Stresses Induced by Hydrostatic Pressure

According to ASTM D3299, Para. 6.1.4 and ASME RTP-1, Para. 3A-210

$$t = PD/S$$

Where: t = Req'd Wall Thickness, inches 3/4"

P = Hydrostatic Pressure, psi 1.516 psi

D = Tank ID, inches 30"

S = Allowable Stress = Ultimate Stress/Safety Factor

S = 15,000/10 1500 psi

$$t = 0.097 \text{ inches} \quad \text{Bearing Loads require 3/4" thickness}$$

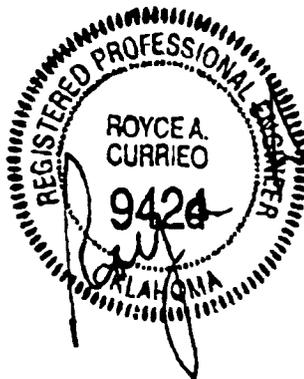
For the Internal Tank $D_o = 72$ " and $t = 3/8$ " per Customer's Dwg # STD-D-1-4042

Load Analysis for Tank Described on DWG # STD-D-1-4042

$t = 0.078$ inches — Customer spec requires $3/8"$

Synopsis: Required Dome Thickness: $3/4"$
Required Riser Wall Thickness: $7/16"$
Required External Tank Wall Thickness: $3/4"$
Required Internal Wall Thickness: $3/8"$

Royce A. Currieo, P. E.
Oklahoma Certificate No. 9424



Currieo

Enseco Incorporated

CEGAR HILL C.D.P.
WASTE OIL +
WASTEWATER

ANALYTICAL RESULTS

FOR

NORTHWEST PIPELINE CORPORATION

ENSECO-RMAL NO. 024601

SEPTEMBER 21, 1992



Enseco

A Corning Company

ANALYTICAL RESULTS

FOR

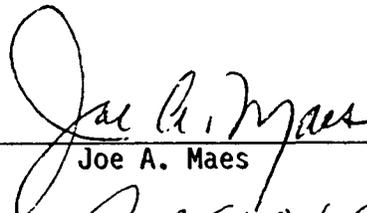
NORTHWEST PIPELINE CORPORATION

ENSECO-RMAL NO. 024601

SEPTEMBER 21, 1992



Reviewed by:



Joe A. Maes



Joel E. Holtz



AMERICAN
WEST
ANALYTICAL
LABORATORIES

ORGANIC ANALYSIS REPORT

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

Contact: Mark Harvey
Date Analyzed: July 26, 1995

Analysis Requested:
Volatile Aromatics
Total Purgeable Hydrocarbons

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

Field Sample ID:
SAN JUAN AREA
CEDAR HILL #1

Lab Sample ID:
L23218-8

463 West 3600 South
Salt Lake City, Utah
84115

Analytical Results
Units = mg/L(ppm)

BTX/TPH-P

<u>Compound:</u>	<u>Detection Limit:</u>	<u>Amount Detected:</u>
Benzene	0.020	0.036
(801) 263-8686 Toluene Fax (801) 263-8687	0.020	0.046
Ethylbenzene	0.020	0.14
Total Xylene	0.020	0.95
Total Purgeable Hydrocarbons	0.20	19.

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

Released By: John H. [Signature]
Laboratory Supervisor

Report Date: July 31, 1995

1 of 1



AMERICAN
WEST
ANALYTICAL
LABORATORIES

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

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

INORGANIC ANALYSIS REPORT

Analytical Results

		<u>Method Used:</u>	<u>Detection Limit: mg/L</u>	<u>Amount Detected: mg/L</u>
463 West 3600 South Salt Lake City, Utah 84115 (801) 263-8686 Fax (801) 263-8687	TOTAL METALS			
	Arsenic	7060	0.005	<0.005
	Barium	6010	0.002	2.8
	Cadmium	6010	0.004	0.013
	Chromium	6010	0.01	0.03
	Lead	6010	0.05	0.13
	Mercury	7471	0.001	<0.001
	Selenium	7740	0.005	<0.005
Silver	6010	0.01	<0.01	

OTHER CHEMISTRIES

pH	150.1	0.1	6.8
TDS	160.1	1.0	3,600.
TOX	9020	0.5	1.6

Released by: _____

PLA
Laboratory Supervisor

Introduction

This report presents the analytical results as well as supporting information to aid in the evaluation and interpretation of the data and is arranged in the following order:

- o Sample Description Information
- o Analytical Test Requests
- o Analytical Results
- o Quality Control Report

All analyses at Enseco are performed so that the maximum concentration of sample consistent with the method is analyzed. Dilutions are at times required to avoid saturation of the detector, to achieve linearity for a specific target compound, or to reduce matrix interferences. In this event, reporting limits are adjusted proportionately. Surrogate compounds may not be measurable in samples which have been diluted.

Sample 024601-0001 was diluted for Method 8020 due to concentrations of target compounds present beyond linear range; the reporting limits have been increased accordingly.

Sample 024601-0002 was diluted for Method 9020 due to matrix interferences; the reporting limits have been increased accordingly.

Sample Description Information

The Sample Description Information lists all of the samples received in this project together with the internal laboratory identification number assigned for each sample. Each project received at Enseco-RMAL is assigned a unique six digit number. Samples within the project are numbered sequentially. The laboratory identification number is a combination of the six digit project code and the sample sequence number.

Also given in the Sample Description Information is the Sample Type (matrix), Date of Sampling (if known) and Date of Receipt at the laboratory.

Analytical Test Requests

The Analytical Test Requests lists the analyses that were performed on each sample. The Custom Test column indicates where tests have been modified to conform to the specific requirements of this project.

SAMPLE DESCRIPTION INFORMATION
for
Northwest Pipeline Corporation

Lab ID	Client ID	Matrix	Sampled Date	Time	Received Date
024601-0001-SA	CEDAR HILL CDP WASTE WATER TAN	AQUEOUS	18 AUG 92	12:40	19 AUG 92
024601-0002-SA	WASTE OIL TANK CEDAR HILL	AQUEOUS	18 AUG 92	11:30	19 AUG 92
024601-0003-TB	TRIP BLANK	AQUEOUS			19 AUG 92

ANALYTICAL TEST REQUESTS
for
Northwest Pipeline Corporation

Lab ID: 024601	Group Code	Analysis Description	Custom Test?		
0001	A	pH	N		
		Total Dissolved Solids (TDS)	N		
		ICP Metals (Total)	Y		
		Prep - Total Metals, ICP	N		
		Total Organic Halogen (TOX)	N		
		Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)	N		
		Arsenic, Furnace AA (Total)	N		
		Prep - Total Metals, Furnace AA	N		
		Lead, Furnace AA (Total)	N		
		Mercury, Cold Vapor AA (Total)	N		
		Prep - Mercury, Cold Vapor AA (Total)	N		
		0002	B	Arsenic, Furnace AA	N
				Prep - Total Metals, Furnace AA	N
ICP Suite	Y				
Prep - Total Metals, ICP	N				
Lead, Furnace AA	N				
Total Organic Halogen (TOX)	N				
Ignitability, Closed Cup	N				
0003	C	Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)	N		

Analytical Results

The analytical results for this project are presented in the following data tables. Each data table includes sample identification information, and when available and appropriate, dates sampled, received, authorized, prepared and analyzed. The authorization data is the date when the project was defined by the client such that laboratory work could begin.

Data sheets contain a listing of the parameters measured in each test, the analytical results and the Enseco reporting limit. Reporting limits are adjusted to reflect dilution of the sample, when appropriate. Solid and waste samples are reported on an "as received" basis, i.e. no correction is made for moisture content.

The results from the Standard Enseco QA/QC Program, which generates data which are independent of matrix effects, are provided subsequently.

Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)

Enseco
A Corning Company

Method 8020

Client Name: Northwest Pipeline Corporation
Client ID: CEDAR HILL CDP WASTE WATER TANK
Lab ID: 024601-0001-SA
Matrix: AQUEOUS
Authorized: 19 AUG 92
Sampled: 18 AUG 92
Prepared: NA
Received: 19 AUG 92
Analyzed: 22 AUG 92

Parameter	Result	Units	Reporting Limit
Benzene	19	ug/L	1.2
Toluene	63	ug/L	1.2
Ethylbenzene	12	ug/L	1.2
Xylenes (total)	240	ug/L	1.2
Surrogate	Recovery		
a,a,a-Trifluorotoluene	112	%	

ND = Not detected
NA = Not applicable

Reported By: Steve Shurgot

Approved By: Stan Dunlavy

Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)

Enseco
A Corning Company

Method 8020

Client Name: Northwest Pipeline Corporation

Client ID: TRIP BLANK

Lab ID: 024601-0003-TB

Matrix: AQUEOUS

Authorized: 19 AUG 92

Sampled: Unknown

Prepared: NA

Received: 19 AUG 92

Analyzed: 24 AUG 92

Parameter	Result	Units	Reporting Limit
Benzene	ND	ug/L	0.50
Toluene	ND	ug/L	0.50
Ethylbenzene	ND	ug/L	0.50
Xylenes (total)	ND	ug/L	0.50
Surrogate	Recovery		
a,a,a-Trifluorotoluene	106	%	

ND = Not detected
NA = Not applicable

Reported By: Steve Shurgot

Approved By: Stan Dunlavy

Metals

Total Metals

Client Name: Northwest Pipeline Corporation
 Client ID: CEDAR HILL CDP WASTE WATER TANK
 Lab ID: 024601-0001-SA
 Matrix: AQUEOUS
 Authorized: 19 AUG 92
 Sampled: 18 AUG 92
 Prepared: See Below
 Received: 19 AUG 92
 Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic	ND	mg/L	0.0050	7060	10 SEP 92	12 SEP 92
Barium	0.11	mg/L	0.010	6010	10 SEP 92	15 SEP 92
Cadmium	ND	mg/L	0.0050	6010	10 SEP 92	15 SEP 92 B
Chromium	0.15	mg/L	0.010	6010	10 SEP 92	15 SEP 92
Lead	0.020	mg/L	0.010	7421	10 SEP 92	11 SEP 92
Mercury	ND	mg/L	0.00020	7470	13 SEP 92	13 SEP 92

Note B : Compound is also detected in the blank.

ND = Not detected
 NA = Not applicable

Reported By: Jeff Malecha

Approved By: Sandra Jones

Metals

Total Metals

Client Name: Northwest Pipeline Corporation

Client ID: WASTE OIL TANK CEDAR HILL

Lab ID: 024601-0002-SA

Matrix: WASTE

Authorized: 19 AUG 92

Sampled: 18 AUG 92

Prepared: See Below

Received: 19 AUG 92

Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Arsenic	ND	mg/kg	1.0	7060	14 SEP 92	16 SEP 92
Cadmium	ND	mg/kg	0.50	6010	14 SEP 92	15 SEP 92
Chromium	1.0	mg/kg	1.0	6010	14 SEP 92	15 SEP 92
Lead	2.8	mg/kg	2.2	7421	14 SEP 92	14 SEP 92

ND = Not detected

NA = Not applicable

Reported By: Bob Reilly

Approved By: Sandra Jones

General Inorganics

Enseco
A Corning Company

Client Name: Northwest Pipeline Corporation
Client ID: CEDAR HILL CDP WASTE WATER TANK
Lab ID: 024601-0001-SA
Matrix: AQUEOUS
Authorized: 19 AUG 92
Sampled: 18 AUG 92
Prepared: See Below
Received: 19 AUG 92
Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
pH	4.9	units	--	9040	NA	19 AUG 92
Total Organic Halogen as Cl	71.4	ug/L	30.0	9020	NA	10 SEP 92
Total Dissolved Solids	498	mg/L	10.0	160.1	NA	25 AUG 92

ND = Not detected
NA = Not applicable

Reported By: Pam Rosas

Approved By: Steve Shurgot

General Inorganics

Enseco
A Coming Company

Client Name: Northwest Pipeline Corporation
Client ID: WASTE OIL TANK CEDAR HILL
Lab ID: 024601-0002-SA
Matrix: WASTE
Authorized: 19 AUG 92

Sampled: 18 AUG 92
Prepared: See Below

Received: 19 AUG 92
Analyzed: See Below

Parameter	Result	Units	Reporting Limit	Analytical Method	Prepared Date	Analyzed Date
Ignitability	>160	deg. F	--	1010	NA	03 SEP 92 o
Total Organic Halogen as Cl	ND	mg/kg	3.0	9020	NA	15 SEP 92

Note o : This test is unreliable for any sample other than a non-aqueous liquid.

ND = Not detected
NA = Not applicable

Reported By: Leslie Gergurich

Approved By: Steve Shurgot

Quality Control Report

The Enseco laboratories operate under a vigorous QA/QC program designed to ensure the generation of scientifically valid, legally defensible data by monitoring every aspect of laboratory operations. Routine QA/QC procedures include the use of approved methodologies, independent verification of analytical standards, use of Duplicate Control Samples to assess the precision and accuracy of the methodology on a routine basis, and a rigorous system of data review.

In addition, the Enseco laboratories maintain a comprehensive set of certifications from both state and federal governmental agencies which require frequent analyses of blind audit samples. Enseco-Rocky Mountain Analytical Laboratory is certified by the EPA under the EPA/CLP program for Organic analyses, under the USATHAMA (U.S. Army) program, by the Army Corps of Engineers, and the states of Colorado, New Jersey, Utah, and Florida, among others.

The standard laboratory QC package is designed to:

- 1) establish a strong, cost-effective QC program that ensures the generation of scientifically valid, legally defensible data
- 2) assess the laboratory's performance of the analytical method using control limits generated with a well-defined matrix
- 3) establish clear-cut guidelines for acceptability of analytical data so that QC decisions can be made immediately at the bench, and
- 4) provide a standard set of reportables which assures the client of the quality of his data.

The Enseco QC program is based upon monitoring the precision and accuracy of an analytical method by analyzing a set of Duplicate Control Samples (DCS) at frequent, well-defined intervals. Each DCS is a well-characterized matrix which is spiked with target compounds at 5-100 times the reporting limit, depending upon the methodology being monitored. The purpose of the DCS is not to duplicate the sample matrix, but rather to provide an interference-free, homogeneous matrix from which to gather data to establish control limits. These limits are used to determine whether data generated by the laboratory on any given day is in control.

Control limits for accuracy (percent recovery) are based on the average, historical percent recovery +/- 3 standard deviation units. Control limits for precision (relative percent difference) range from 0 (identical duplicate DCS results) to the average, historical relative percent difference + 3 standard deviation units. These control limits are fairly narrow based on the consistency of the matrix being monitored and are updated on a quarterly basis.

For each batch of samples analyzed, an additional control measure is taken in the form of a Single Control Sample (SCS). The SCS consists of a control matrix that is spiked with either representative target compounds or surrogate compounds appropriate to the method being used. An SCS is prepared for each sample lot for which the DCS pair are not analyzed.

Accuracy for DCS and SCS is measured by Percent Recovery.

$$\% \text{ Recovery} = \frac{\text{Measured Concentration}}{\text{Actual Concentration}} \times 100$$

Precision for DCS is measured by Relative Percent Difference (RPD).

$$\text{RPD} = \frac{|\text{Measured Concentration DCS1} - \text{Measured Concentration DCS2}|}{(\text{Measured Concentration DCS1} + \text{Measured Concentration DCS2})/2} \times 100$$

All samples analyzed concurrently by the same test are assigned the same QC lot number. Projects which contain numerous samples, analyzed over several days, may have multiple QC lot numbers associated with each test. The QC information which follows includes a listing of the QC lot numbers associated with each of the samples reported, DCS and SCS (where applicable) recoveries from the QC lots associated with the samples, and control limits for these lots. The QC data is reported by test code, in the order that the tests are reported in the analytical results section of this report.

QC LOT ASSIGNMENT REPORT
Organics by Chromatography

Laboratory Sample Number	QC Matrix	QC Category	QC Lot Number (DCS)	QC Run Number (SCS/BLANK)
024601-0001-SA	AQUEOUS	602-A	18 AUG 92-1H	22 AUG 92-1H
024601-0003-TB	AQUEOUS	602-A	18 AUG 92-1H	24 AUG 92-1H

DUPLICATE CONTROL SAMPLE REPORT
Organics by Chromatography

Analyte	Concentration Spiked	Concentration Measured		AVG	Accuracy Average(%)		Precision (RPD)	
		DCS1	DCS2		DCS	Limits	DCS Limit	DCS Limit
Category: 602-A								
Matrix: AQUEOUS								
QC Lot: 18 AUG 92-1H								
Concentration Units: ug/L								
Benzene	5.0	5.28	5.29	5.28	106	72-112	0.2	10
Toluene	5.0	4.99	5.01	5.00	100	74-109	0.4	10
Ethylbenzene	5.0	4.85	4.89	4.87	97	76-105	0.8	10
Xylenes (total)	5.0	4.82	4.88	4.85	97	74-111	1.2	10
1,3-Dichlorobenzene	5.0	4.83	4.94	4.88	98	72-121	2.3	15

Calculations are performed before rounding to avoid round-off errors in calculated results.

SINGLE CONTROL SAMPLE REPORT
Organics by Chromatography

Analyte	Concentration		Accuracy(%)	
	Spiked	Measured	SCS	Limits
Category: 602-A Matrix: AQUEOUS QC Lot: 18 AUG 92-1H QC Run: 22 AUG 92-1H Concentration Units: ug/L				
a,a,a-Trifluorotoluene	30.0	31.2	104	90-113

Category: 602-A Matrix: AQUEOUS QC Lot: 18 AUG 92-1H QC Run: 24 AUG 92-1H Concentration Units: ug/L				
a,a,a-Trifluorotoluene	30.0	30.9	103	90-113

Calculations are performed before rounding to avoid round-off errors in calculated results.

METHOD BLANK REPORT
Organics by Chromatography

Analyte	Result	Units	Reporting Limit
Test: 8020-BTEX-AP			
Matrix: AQUEOUS			
QC Lot: 18 AUG 92-1H QC Run: 22 AUG 92-1H			
Benzene	ND	ug/L	0.50
Toluene	ND	ug/L	0.50
Ethylbenzene	ND	ug/L	0.50
Xylenes (total)	ND	ug/L	0.50

Test: 8020-BTEX-AP			
Matrix: AQUEOUS			
QC Lot: 18 AUG 92-1H QC Run: 24 AUG 92-1H			
Benzene	ND	ug/L	0.50
Toluene	ND	ug/L	0.50
Ethylbenzene	ND	ug/L	0.50
Xylenes (total)	ND	ug/L	0.50

QC LOT ASSIGNMENT REPORT
Metals Analysis and Preparation

Laboratory Sample Number	QC Matrix	QC Category	QC Lot Number (DCS)	QC Run Number (SCS/BLANK)
024601-0001-SA	AQUEOUS	ICP-AT	10 SEP 92-1A	10 SEP 92-1A
024601-0001-SA	AQUEOUS	AS-FAA-AT	10 SEP 92-1A	10 SEP 92-1A
024601-0001-SA	AQUEOUS	PB-FAA-AT	10 SEP 92-1A	10 SEP 92-1A
024601-0001-SA	AQUEOUS	HG-CVAA-AT	13 SEP 92-1A	13 SEP 92-1A
024601-0002-SA	SOIL	AS-FAA-S	11 SEP 92-1A	11 SEP 92-1A
024601-0002-SA	SOIL	ICP-S	14 SEP 92-1R	14 SEP 92-1R
024601-0002-SA	SOIL	PB-FAA-S	14 SEP 92-1R	14 SEP 92-1R

DUPLICATE CONTROL SAMPLE REPORT
Metals Analysis and Preparation

Analyte	Concentration			AVG	Accuracy		Precision	
	Spiked	DCS1	Measured DCS2		Average(%) DCS	Limits	(RPD) DCS	Limit
Category: ICP-AT								
Matrix: AQUEOUS								
QC Lot: 10 SEP 92-1A								
Concentration Units: mg/L								
Aluminum	2.0	2.03	2.04	2.03	102	75-125	0.2	20
Antimony	0.5	0.510	0.499	0.505	101	75-125	2.2	20
Arsenic	0.5	0.480	0.453	0.467	93	75-125	5.7	20
Barium	2.0	1.92	1.93	1.92	96	75-125	0.4	20
Beryllium	0.05	0.0500	0.0497	0.0498	100	75-125	0.6	20
Cadmium	0.05	0.0468	0.0442	0.0455	91	75-125	5.7	20
Calcium	100	103	102	103	103	75-125	1.0	20
Chromium	0.2	0.190	0.195	0.192	96	75-125	2.6	20
Cobalt	0.5	0.471	0.467	0.469	94	75-125	0.9	20
Copper	0.25	0.281	0.269	0.275	110	75-125	4.4	20
Iron	1.0	1.01	1.00	1.01	101	75-125	1.0	20
Lead	0.5	0.472	0.475	0.473	95	75-125	0.7	20
Magnesium	50	51.1	50.6	50.8	102	75-125	1.0	20
Manganese	0.5	0.489	0.477	0.483	97	75-125	2.5	20
Nickel	0.5	0.483	0.478	0.480	96	75-125	1.1	20
Potassium	50	52.5	51.9	52.2	104	75-125	1.2	20
Silver	0.05	0.0488	0.0477	0.0483	97	75-125	2.2	20
Sodium	100	110	109	109	109	75-125	1.6	20
Vanadium	0.5	0.495	0.497	0.496	99	75-125	0.4	20
Zinc	0.5	0.496	0.489	0.492	98	75-125	1.6	20

Category: AS-FAA-AT
Matrix: AQUEOUS
QC Lot: 10 SEP 92-1A
Concentration Units: mg/L

Arsenic	0.03	0.0329	0.0348	0.0338	113	75-125	5.6	20
---------	------	--------	--------	--------	-----	--------	-----	----

Category: PB-FAA-AT
Matrix: AQUEOUS
QC Lot: 10 SEP 92-1A
Concentration Units: mg/L

Lead	0.03	0.0349	0.0313	0.0331	110	75-125	11	20
------	------	--------	--------	--------	-----	--------	----	----

Calculations are performed before rounding to avoid round-off errors in calculated results.

DUPLICATE CONTROL SAMPLE REPORT
Metals Analysis and Preparation (cont.)

Analyte	Concentration				Accuracy		Precision	
	Spiked	DCS1	Measured DCS2	AVG	DCS	Average(%) Limits	(RPD)	DCS Limit

Category: HG-CVAA-AT
Matrix: AQUEOUS
QC Lot: 13 SEP 92-1A
Concentration Units: mg/L

Mercury	0.0010	0.000967	0.00100	0.000983	98	75-125	3.4	20
---------	--------	----------	---------	----------	----	--------	-----	----

Category: AS-FAA-S
Matrix: SOIL
QC Lot: 11 SEP 92-1A
Concentration Units: mg/kg

Arsenic	145	102	104	103	71	59-141	1.0	20
---------	-----	-----	-----	-----	----	--------	-----	----

Category: ICP-S
Matrix: SOIL
QC Lot: 14 SEP 92-1R
Concentration Units: mg/kg

Aluminum	10700	6840	7480	7160	67	47-153	8.8	20
Antimony	55.2	54.8	57.4	56.1	102	18-362	4.6	50
Arsenic	145	128	135	131	91	59-141	4.9	20
Barium	503	435	459	447	89	76-124	5.5	20
Beryllium	129	118	124	121	94	53-131	4.9	20
Cadmium	154	140	147	144	93	68-132	4.6	20
Calcium	7390	6600	6960	6780	92	79-121	5.4	20
Chromium	151	127	136	132	87	66-133	6.9	20
Cobalt	122	110	116	113	93	70-130	5.4	20
Copper	162	156	165	161	99	70-132	5.4	20
Iron	15400	12400	13400	12900	84	66-134	7.2	20
Lead	148	129	139	134	90	66-135	6.9	20
Magnesium	3740	3250	3480	3360	90	74-126	7.0	20
Manganese	423	376	397	387	91	74-125	5.5	20
Molybdenum	159	145	152	148	93	71-129	5.1	20
Nickel	166	154	162	158	95	67-133	5.1	20
Potassium	4050	3530	3770	3650	90	68-132	6.6	20
Silver	104	98.2	106	102	98	76-124	7.6	20
Sodium	747	717	766	741	99	57-130	6.6	20
Vanadium	154	135	142	138	90	73-127	5.2	20
Zinc	530	478	504	491	93	65-135	5.3	20

Calculations are performed before rounding to avoid round-off errors in calculated results.

DUPLICATE CONTROL SAMPLE REPORT
Metals Analysis and Preparation (cont.)

Analyte	Spiked	Concentration		AVG	Accuracy		Precision		
		DCS1	Measured DCS2		DCS	Average(%) Limits	(RPD) DCS Limit	DCS Limit	
Category: PB-FAA-S Matrix: SOIL QC Lot: 14 SEP 92-1R Concentration Units: mg/kg									
Lead	150	132	148	140	93	50-150	11	20	

Calculations are performed before rounding to avoid round-off errors in calculated results.

METHOD BLANK REPORT
Metals Analysis and Preparation

Analyte	Result	Units	Reporting Limit
Test: ICP-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A QC Run: 10 SEP 92-1A			
Barium	ND	mg/L	0.010
Cadmium	0.0099	mg/L	0.0050
Chromium	ND	mg/L	0.010
Test: AS-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A QC Run: 10 SEP 92-1A			
Arsenic	ND	mg/L	0.0050
Test: PB-FAA-AT Matrix: AQUEOUS QC Lot: 10 SEP 92-1A QC Run: 10 SEP 92-1A			
Lead	ND	mg/L	0.0050
Test: HG-CVAA-AT Matrix: AQUEOUS QC Lot: 13 SEP 92-1A QC Run: 13 SEP 92-1A			
Mercury	ND	mg/L	0.00020
Test: AS-FAA-W Matrix: WASTE QC Lot: 11 SEP 92-1A QC Run: 11 SEP 92-1A			
Arsenic	ND	mg/kg	0.50
Test: ICP-W Matrix: WASTE QC Lot: 14 SEP 92-1R QC Run: 14 SEP 92-1R			
Cadmium	ND	mg/kg	0.50
Chromium	ND	mg/kg	1.0

METHOD BLANK REPORT
Metals Analysis and Preparation (cont.)

Analyte	Result	Units	Reporting Limit
Test: PB-FAA-W			
Matrix: WASTE			
QC Lot: 14 SEP 92-1R	QC Run: 14 SEP 92-1R		
Lead	ND	mg/kg	0.50

QC LOT ASSIGNMENT REPORT
Wet Chemistry Analysis and Preparation

Laboratory Sample Number	QC Matrix	QC Category	QC Lot Number (DCS)	QC Run Number (SCS/BLANK)
024601-0001-SA	AQUEOUS	PH-A	19 AUG 92-1G	-
024601-0001-SA	AQUEOUS	TDS-A	25 AUG 92-1A	25 AUG 92-1A
024601-0001-SA	AQUEOUS	TOX-A	10 SEP 92-1A	-
024601-0002-SA	SOIL	TOX-S	15 SEP 92-1A	-

DUPLICATE CONTROL SAMPLE REPORT
Wet Chemistry Analysis and Preparation

Analyte	Concentration Spiked	Concentration Measured		AVG	Accuracy Average(%)		Precision (RPD)		
		DCS1	DCS2		DCS	Limits	DCS	Limit	
Category: PH-A Matrix: AQUEOUS QC Lot: 19 AUG 92-1G Concentration Units: units									
pH	9.1	9.04	9.05	9.04	99	98-102	0.1	5	
Category: TDS-A Matrix: AQUEOUS QC Lot: 25 AUG 92-1A Concentration Units: mg/L									
Total Dissolved Solids	1170	1150	1130	1140	97	90-110	1.8	10	
Category: TOX-A Matrix: AQUEOUS QC Lot: 10 SEP 92-1A Concentration Units: ug Cl/L									
Total Organic Halogen as Cl	100	90.0	90.6	90.3	90	80-120	0.7	20	
Category: TOX-S Matrix: SOIL QC Lot: 15 SEP 92-1A Concentration Units: mg/kg									
Total Organic Halogen as Cl	1.0	0.955	1.05	1.00	100	75-125	9.5	20	

Calculations are performed before rounding to avoid round-off errors in calculated results.

METHOD BLANK REPORT
Wet Chemistry Analysis and Preparation

Analyte	Result	Units	Reporting Limit
Test: TDS-BAL-A			
Matrix: AQUEOUS			
QC Lot: 25 AUG 92-1A QC Run: 25 AUG 92-1A			
Total Dissolved Solids	ND	mg/L	10.0



Appendix



Rocky Mountain Analytical Laboratory
 4955 Yarrow Street
 Arvada, CO 80002
 303/421-6611 FAX: 303/431-7171

CHAIN OF CUSTODY

		SAMPLE SAFE™ CONDITIONS	
ENSECO CLIENT		PACKED BY	SEAL NUMBER
PROJECT		SEAL INTACT UPON RECEIPT BY SAMPLING COMPANY	CONDITION OF CONTENTS
SAMPLING COMPANY		SEALED FOR SHIPPING BY	INITIAL CONTENTS TEMP. °C
SAMPLING SITE		SEAL NUMBER	SAMPLING STATUS <input type="checkbox"/> Done <input type="checkbox"/> Continuing Until
TEAM LEADER		SEAL INTACT UPON RECEIPT BY LAB. <input type="checkbox"/> Yes <input type="checkbox"/> No	CONTENTS TEMPERATURE UPON RECEIPT BY LAB. JM °C

DATE	TIME	SAMPLE ID/DESCRIPTION	SAMPLE TYPE	# CONTAINERS	ANALYSIS PARAMETERS	REMARKS
18-92	12:49	WASTE CEDAR HILL CDP WATER TANK	LIQUID AQUEOUS	1	PH / TDS	01
18-92	12:50	" " "	LIQUID AQUEOUS	1	PH / TDS	02
18-92	12:45	" " "	LIQUID METALS	4T	METALS	01 01
18-92	12:47	" " "	LIQUID METALS	4T	METALS	02
18-92	12:40	" " "	LIQUID	15	Tox -- SINGLE	01
18-92	12:40	" " "	LIQUID	15	Tox -- SINGLE	02
18-92	11:30	WASTE OIL TANK CEDAR HILL	USED OIL			
18-92	11:45	WASTE OIL TANK CEDAR HILL	USED OIL			02
18-92	11:50	WASTE OIL TANK CEDAR HILL	USED OIL			
18-92	12:00	WASTE OIL TANK CEDAR HILL	USED OIL			

CUSTODY TRANSFERS PRIOR TO SHIPPING				SHIPPING DETAILS	
RELINQUISHED BY (SIGNED)	RECEIVED BY (SIGNED)	DATE	TIME	DELIVERED TO SHIPPER BY	
<i>[Signature]</i>	<i>[Signature]</i>	8/18/92	2:07		
				METHOD OF SHIPMENT	AIRBILL NUMBER
				RECEIVED FOR LAB	SIGNED
				<i>[Signature]</i>	<i>[Signature]</i>
				ENSECO PROJECT NUMBER	DATE/TIME
				24601	0845 8/19/92



Rocky Mountain Analytical Laboratory
 4955 Yarrow Street
 Arvada, CO 80002
 303/421-6611 FAX: 303/431-7171

CHAIN OF CUSTODY

		SAMPLE SAFE™ CONDITIONS	
ENSECO CLIENT		PACKED BY	SEAL NUMBER
PROJECT		SEAL INTACT UPON RECEIPT BY SAMPLING COMPANY	CONDITION OF CONTENTS
SAMPLING COMPANY		SEALED FOR SHIPPING BY	INITIAL CONTENTS TEMP. °C
SAMPLING SITE		SEAL NUMBER	SAMPLING STATUS <input type="checkbox"/> Done <input type="checkbox"/> Continuing Until
TEAM LEADER		SEAL INTACT UPON RECEIPT BY LAB <input type="checkbox"/> Yes <input type="checkbox"/> No	CONTENTS TEMPERATURE UPON RECEIPT BY LAB °C

DATE	TIME	SAMPLE ID/DESCRIPTION	SAMPLE TYPE	# CONTAINERS	ANALYSIS PARAMETERS	REMARKS
-18-92	12:51	CEDAR HILL COP WASTE WATER	LIQUIDS AQUEOUS	11	VOA	} 01
-18-92	12:53	" "	LIQUIDS AQUEOUS	11	VOA	
18-92	12:55	" "	LIQUIDS AQUEOUS	11	VOA	

CUSTODY TRANSFERS PRIOR TO SHIPPING				SHIPPING DETAILS	
RELINQUISHED BY (SIGNED)	RECEIVED BY (SIGNED)	DATE	TIME	DELIVERED TO SHIPPER BY	
				METHOD OF SHIPMENT	AIRBILL NUMBER
				RECEIVED FOR LAB <i>[Signature]</i>	SIGNED <i>[Signature]</i>
				ENSECO PROJECT NUMBER 24601	DATE/TIME 8/19/92

OPERATIONS

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Subject of Title

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

A. PURPOSE AND SCOPE

- A.1 To establish the policy and procedure for preventing, controlling, and reporting of spills or discharges of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
- A.2 This document pertains to Company personnel and Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

B. CONTENTS

C. POLICY

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

D. PROCEDURE

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

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

C. POLICY

C.1 GENERAL

- C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.
- C.1.2 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
- a. Section 101 (N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
 - b. Section 307(a) and Section 311 (b)(2)(A) of the Clean Water Act
 - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
 - d. Section 112 of the Clean Air Act
 - e. Section 7 of the Toxic Substance Control Act

WILLIAMS FIELD SERVICES COMPANY
 ONE OF THE WILLIAMS COMPANIES 
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- C.1.3 The term hazardous substance does not include petroleum, including crude oil or any fraction thereof, which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.4 Oil, for the purpose of this document, means oil of any kind or in any form, including but not limited to petroleum, fuel oil, Y grade, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) are not considered to be oil.
- C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the required federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
- a. Non-Transportation Related Facilities
 - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
 - (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
 - b. Transportation Related Facilities
 - (1) All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.
- C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all hazardous substance storage vessels at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.
- C.1.8 The facility supervisor is responsible for spill prevention. His/her duties include, but are not limited to, the following:
- a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
 - b. Conduct briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
 - c. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.
- C.1.9 Each individual facility is checked by the supervisor or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.

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

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

C.2 BULK STORAGE TANKS

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

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

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

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

C.3 FACILITY DRAINAGE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

D. PROCEDURE

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

Any Employee

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

NOTE: Refer to Attachment A for containment procedures.

Facility Supervisor

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

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

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Gas Control Personnel

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

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

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

Facility Supervisor

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

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

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

Environmental Services

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

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

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

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Supervisor

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

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

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

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

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ATTACHMENT A

Discharge or Spill Containment Procedures and Materials

Type of Facility where the Discharge or Spill occurs	Containment Procedures	Material Used for Containment
A. Oil Pipeline (as defined in C.1.4)	<ol style="list-style-type: none"> 1. Closes appropriate block valves. 2. Contains discharge or spill by: ditching covering, applying sorbents, constructing an earthen dam, or burning. 3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. 	<ol style="list-style-type: none"> 1. Straw 2. Loose Earth 3. Oil Sorbent - 3M Brand 4. Plain Wood Chips 5. Sorb - Oil Chips Banta Co. 6. Sorb - Oil Swabs - Banta Co. 7. Sorb - Oil Mats - Banta Co. 8. Or Equivalent Materials.
B. Vehicle	<ol style="list-style-type: none"> 1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, applying sorbents, or burning. 2. Notifies immediately the Compliance and Safety Department and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials. 3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. <p>NOTE: Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.</p>	
C. Bulk Storage Tanks or any other Facilities	<ol style="list-style-type: none"> 1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning. 2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. 	

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

DISTRICT II
J. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

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

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

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

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

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

1995 OCT 27 PM 1: 25

B. Plans, specifications and reports required by this Section, if related to facilities for the production, refinement and pipeline transmission of oil and gas, or products thereof, shall be filed instead with the Oil Conservation Division. [1-4-68, 12-1-95]

C. Plans and specifications required to be filed under this Section must be filed prior to the commencement of construction. [9-3-72]

1203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required: [2-17-74, 12-24-87]

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

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

b. the name and address of the facility;

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

d. the source and cause of discharge;

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

f. the estimated volume of the discharge; and

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

[2-17-74, 2-20-81, 12-24-87, 12-1-95]

2. When in doubt as to which agency to notify, the

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person in charge of the facility shall notify the Chief of the Ground Water Protection and Remediation Bureau of the department. If that department does not have authority pursuant to commission delegation, the department shall notify the appropriate constituent agency. [12-24-87, 12-1-95]

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same department official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification. [12-24-87]

4. The oral and written notification and reporting requirements contained in this Subsection A are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein. [2-17-74, 12-24-87]

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge. [2-17-74, 12-24-87]

6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief of the Ground Water Protection and Remediation Bureau of the department or appropriate counterpart in a delegated agency, in an effort to determine the department's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days. [12-24-87, 12-1-95]

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

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time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the department. [12-24-87]

8. In the event that the modified corrective action report also is unsatisfactory to the department, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the department secretary. The department secretary shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the secretary concerning the shortcomings of the modified corrective action report, the department may take whatever enforcement or legal action it deems necessary or appropriate. [12-24-87, 12-1-95]

9. If the secretary determines that the discharge causes or may with reasonable probability cause water pollution in excess of the standards and requirements of Section 4103 of this Part, and the water pollution will not be abated within one hundred and eighty (180) days after notice is required to be given pursuant to Section 1203.A.1 of this Part, the secretary may notify the facility owner/operator that he is a responsible person and that an abatement plan may be required pursuant to Sections 4104 and 4106.A of this Part. [12-1-95]

B. Exempt from the requirements of this Section are continuous or periodic discharges which are made: [2-17-74]

1. in conformance with regulations of the commission and rules, regulations or orders of other state or federal agencies; or [2-17-74]

2. in violation of regulations of the commission, but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies. [2-17-74]

C. As used in this Section and in Sections 4100 through 4115, but not in other Sections of this Part: [2-17-74, 12-1-95]

1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water; [2-17-74]

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling

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stock, or activity of any kind, whether stationary or mobile;
[2-17-74]

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes; [2-17-74]

4. "operator" means the person or persons responsible for the overall operations of a facility; and
[12-24-87]

5. "owner" means the person or persons who own a facility, or part of a facility. [12-24-87]

D. Notification of discharge received pursuant to this Part or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement.
[2-17-74]

E. Any person who has any information relating to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, is urged to notify the Chief of the Ground Water Protection and Remediation Bureau of the department. Upon such notification, the secretary may require an owner/operator or a responsible person to perform corrective actions pursuant to Sections 1203.A.5 or 1203.A.9 of this Part. [12-1-95]

[1204-1209] Reserved

1210. VARIANCE PETITIONS.

A. Any person seeking a variance pursuant to Section 74-6-4 (G) NMSA 1978, shall do so by filing a written petition with the commission. The petitioner may submit with his petition any relevant documents or material which the petitioner believes would support his petition. Petitions shall: [7-19-68, 11-27-70, 9-3-72]

1. state the petitioner's name and address;
[7-19-68, 11-27-70]

2. state the date of the petition; [7-19-68]

3. describe the facility or activity for which the variance is sought; [7-19-68, 11-27-70]

4. state the address or description of the property upon which the facility is located; [11-27-70]

RULE 113. - SHOOTING AND CHEMICAL TREATMENT OF WELLS

(as of 3-1-91)

If injury results to the producing formation, injection interval, casing or casing seat from shooting, fracturing, or treating a well and which injury may create underground waste or contamination of fresh water, the operator shall give written notice to the Division within five (5) working days and proceed with diligence to use the appropriate method and means for rectifying such damage. If shooting, fracturing, or chemical treating results in irreparable injury to the well the Division may require the operator to properly plug and abandon the well.

RULE 114. - SAFETY REGULATIONS

(as of 3-1-91)

A. All oil wells shall be cleaned into a pit or tank, not less than 40 feet from the derrick floor and 150 feet from any fire hazard. All flowing oil wells must be produced through an oil and gas separator of ample capacity and in good working order. No boiler or portable electric lighting generator shall be placed or remain nearer than 150 feet to any producing well or oil tank. Any rubbish or debris that might constitute a fire hazard shall be removed to a distance of at least 150 feet from the vicinity of wells and tanks. All waste shall be burned or disposed of in such manner as to avoid creating a fire hazard.

B. When coming out of the hole with drill pipe, drilling fluid shall be circulated until equalized and subsequently drilling fluid level shall be maintained at a height sufficient to control subsurface pressures. During course of drilling blowout preventers shall be tested at least once each 24-hour period.

RULE 115. - WELL AND LEASE EQUIPMENT

(as of 3-1-91)

A. Christmas tree fittings or wellhead connections shall be installed and maintained in first class condition so that all necessary pressure tests may easily be made on flowing wells. On oil wells the Christmas tree fittings shall have a test pressure rating at least equivalent to the calculated or known pressure in the reservoir from which production is expected. On gas wells the Christmas tree fittings shall have a test pressure equivalent to at least 150 percent of the calculated or known pressure in the reservoir from which production is expected.

B. Valves shall be installed and maintained in good working order to permit pressures to be obtained on both casing and tubing. Each flowing well shall be equipped to control properly the flowing of each well, and in case of an oil well, shall be produced into an oil and gas separator of a type generally used in the industry.

DUE TO BE REVISED, STILL CURRENT AS OF 10/3/96

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS
AND BLOWOUTS

(as of 3-1-91)

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

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or wellhead.

oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

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

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

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

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

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

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

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

(7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector.

the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

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

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

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

RULE 117. - WELL LOG, COMPLETION AND WORKOVER REPORTS

(as of 3-1-91)

Within 20 days after the completion of a well drilled for oil or gas, or the recompletion of a well into a different common source of supply, a completion report shall be filed with the Division on Form C-105. For the purpose of this rule, any hole drilled or cored below fresh water or which penetrates oil- or gas-bearing formations or which is drilled by an "owner" as defined herein shall be presumed to be a well drilled for oil or gas.

RULE 118. - HYDROGEN SULFIDE GAS - PUBLIC SAFETY

(as of 3-1-91)

A. The intent of this rule is to provide for the protection of the public's safety in areas where hydrogen sulfide (H_2S) gas in concentrations greater than 100 parts per million (PPM) may be encountered.

B. Producing operations should be conducted with due consideration and guidance from American Petroleum Institute (API) publication "Conducting Oil and Gas Production Operations Involving Hydrogen Sulfide" (RP-55). The operator of a lease producing, or a gas processing plant handling H_2S or any other related facility where H_2S gas is present in concentrations of 100 PPM or more shall take reasonable measures to forewarn and safeguard persons having occasion to be on or near the property. In addition to training operator's employees in H_2S safety such measures may include, but are not necessarily limited to, posting of warning signs, fencing of surface installations, installation of safety devices and wind direction indicators, and maintaining tanks, thief hatches and gaskets, valves and piping in condition so as to prevent avoidable loss of vapors. Where release of hydrogen sulfide is unavoidable, the operator shall burn or vent the gas stream in such a manner as to avoid endangering human life.

C. Wells drilled in known H_2S gas producing areas, or where there is substantial probability of encountering H_2S gas in concentrations of 100 PPM or more, should be planned and drilled with due regard to and guidance from API RP-49 "Recommended Practices for Safe Drilling of Wells Containing Hydrogen Sulfide", latest edition. Wells completed and serviced by well servicing units where there is substantial probability of encountering H_2S gas in concentrations of 100 PPM or more should be worked on with due regard to the latest industry accepted practices. These practices may include, but are not necessarily limited to, the proper training of personnel in H_2S safety and the use of H_2S safety equipment as listed for safe operations by the American Petroleum Institute draft report for "Land, Oil and Gas Well Servicing and Workover Operations Involving Hydrogen Sulfide."*

IMPORTANT - READ INSTRUCTIONS ON BACK BEFORE FILLING OUT THIS FORM.

Declaration of Owner of Underground Water Right

San Juan
BASIN NAME

Declaration No. SJ-205

Date received Mar. 31, 1977

STATEMENT

1. Name of Declarant El Paso Natural Gas Company
Mailing Address P. O. Box 1492 79978
County of El Paso State of Texas

2. Source of water supply Shallow Water Aquifer
(artesian or shallow water aquifer)

3. Describe well location under one of the following subheadings:
a. SW 12 Twp. 30 Rge. 9 N.M.P.M., in
San Juan County.

b. Tract No. _____ of Map No. _____ of the _____
c. X = _____ feet, Y = _____ feet, N. M. Coordinate System _____ Zone _____
in the _____ Grant.

On land owned by Bureau of Land Management - Oil & Gas Lease

4. Description of well: date drilled _____ driller _____ depth _____ feet.
outside diameter of casing _____ inches; original capacity _____ gal. per min.; present capacity _____
gal. per min.; pumping lift _____ feet; static water level _____ feet (above) (below) land surface;
make and type of pump _____
make, type, horsepower, etc., of power plant _____
Fractional or percentage interest claimed in well 100%

5. Quantity of water appropriated and beneficially used 1
(acre feet per acre) (acre feet per annum)
for _____ purposes.

6. Acreage actually irrigated _____ acres, located and described as follows (describe only lands actually irrigated):

Subdivision	Sec.	Twp.	Range	Acres Irrigated

(Note: location of well and acreage actually irrigated must be shown on plot on reverse side.)

7. Water was first applied to beneficial use September 19 1958 and since that time
month day year
has been used fully and continuously on all of the above described lands or for the above described purposes except
as follows: Used intermittently as required for drilling and workover operations.
Also used for stock watering.

8. Additional statements or explanations This is a water hole approximately 30' x 100' in size.

I, J. W. McCarthy being first duly sworn upon my oath, depose and say that the above is a full and complete statement prepared in accordance with the instructions on the reverse side of this form and submitted in evidence of ownership of a valid underground water right, that I have carefully read each and all of the items contained therein and that the same are true to the best of my knowledge and belief.

El Paso Natural Gas Company declarant.

by: J. W. McCarthy
day of March, A.D. 1977

Subscribed and sworn to before me this 29 day of March, A.D. 1977

My commission expires June 1, 1977 Ruth Hanson Notary Public

RUTH HANSON
Notary Public in and for El Paso County, Texas
My Commission Expires June 1, 1977

FILED UNDER NEW MEXICO LAW A DECLARATION IS ONLY A STATEMENT OF THE CLAIMANT'S CLAIM. ACCEPTANCE FOR FILING DOES NOT CONSTITUTE APPROVAL BY THE COMMISSIONER OF THE CLAIM.