GW - 320

GENERAL CORRESPONDENCE

YEAR(S):

2000 - 2006

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

November 7, 2007

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

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

Dear Mr. Lowe,

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

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

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

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

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

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

Respectfully submitted,

David Bays
Senior Environmental Specialist

Attachment

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

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

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

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

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

2006 AUG 23 AM 11 44

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

August 22, 2006

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

Re: Change of Company Name

Dear Mr. Price;

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

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

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

Sincerely,

David Bays
Senior Environmental Specialist

Attachments

xc: Clara Cardoza
Monica Sandoval
WFS FCA file 210

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

October 4, 2005

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

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

Dear Mr. Ford:

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

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

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

Thank you,

Monica Sandoval

Monica Sandoval
Environmental Compliance

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

with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

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

(GW-204)-Baker Hughes Petrolite (formerly Petrolite Corporation), Mr. Roy Young, 10520 West I-20 East, Odessa

face will be managed in order to protect fresh water. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentrations of approximately 712 mg/l. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

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

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

(GW-323) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Horton compressor station located in the SE/4 SE/4, Section 10, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per

AFFIDAVIT OF PUBLICATION

Ad No. 52023

STATE OF NEW MEXICO
County of San Juan:

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

Monday, July 25, 2005.

And the cost of the publication is $168.46.

Connie Pruitt

ON 7/25/05 CONNIE PRUITT appeared before me, whom I know personally

COPY OF PUBLICATION

NOTICE OF PUBLICATION

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

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

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

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

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

(GW-320) - Williams Field Services, Inc., David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Richardson Straddle compressor station located in the SW/4 NE/4, Section 27, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Up to 3,000 barrels per year of pro-

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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

or cash received on _____ in the amount of $ 600.00

from Williams Field Services

for 6 Compressor Stations - see attached
(Facility Name)

Submitted by: _____ Date: 7-12-05
(OP No.)

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ✓

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

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

Williams

WILLIAMS FIELD SERVICES COMPANY
PO Box 21215
Tulsa, OK 74121-1215
Customer Support: 1-866-778-2665

Wachovia Bank, N.A.
Chicago, IL

[redacted]

DATE 06/21/2005

PAY TO THE ORDER OF

PAY $**********600.00
USD

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

SANTA FE NM 87505
UNITED STATES

Authorized Signer

SUPPLIER NUMBER
403816

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

[redacted]

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

June 30, 2005

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

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

Dear Mr. Ford:

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

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

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

Thank you,

Monica Sandoval

Monica Sandoval
Environmental Compliance

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

PUBLIC NOTICE

Notice of Discharge Plan Renewal Application

Richardson Compressor Station

Pursuant to the requirements of the New Mexico Water Quality Control Commission Regulation 20 NMAC 2.6.2 – GROUND AND SURFACE WATER PROTECTION, Williams Field Services Company of 188 County Road 4900, Bloomfield, NM 87413, hereby announces intent to apply to the New Mexico Oil Conservation Division to renew the Discharge Plan for the Richardson Compressor Station. Williams expects to submit the permit application to the Oil Conservation Division in June 2005.

The facility, located in Section 10, Township 31 North, Range 12 West, San Juan County, New Mexico, approximately 7.5 miles northwest 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 expected to be greater than 50 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

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

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

June 8, 2005

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Richardson Straddle Compressor Station (GW-320). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during June 2005.

The facility, located in Section 10, Township 31 North, Range 12 West, San Juan County, New Mexico, approximately 7.5 miles northwest 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 expected to be greater than 50 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,

Clara Garcia
Environmental Compliance Administrator

7005 0390 0005 7906 7972

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com
FARMINGTON NM 87401
OFFICIAL USE

Postage	$ 0.37	UNIT ID: 0012
Certified Fee	2.30	
Return Receipt Fee (Endorsement Required)	1.75	Postmark Here
Restricted Delivery Fee (Endorsement Required)		Clerk: KS5093
Total Postage & Fees	$ 4.42	06/16/05

Rich D.P

Sent To: BLM
Street, Apt. No.; or PO Box No.: 1235 N. La Plata Hwy
City, State, ZIP+4: Farmington NM 87401

PS Form 3800, June 2002 — See Reverse for Instructions

NOTA PUBLICA

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

Estación de Compresor de Richardson

Según los requisitos de la Regulación de la Comisión de Control de calidad de Agua de nuevo méxico 20 2.6.2 de NMAC – el SUELO Y la PROTECCION de AGUA de SUPERFICIE, William Field Services 188 County Road 4900, Bloomfield, NM 87413, por la presente anuncian la intención para aplicar a la División de la Conservación del Petróleo de nuevo méxico para renovar el Plan de la Descarga para la Estación de Compresor de Richardson. William esperan someterse la aplicación del permiso a la División de la Conservación del Petróleo en junio 2005.

La facilidad, localizado en la Sección 10, Municipio 31 al norte, la Gama 12 al oeste, San Condado de Juan, nuevo méxico, aproximadamente 7,5 noroeste de millas de azteca, proporciona gas natural la compresión y condicionar los servicios. Las direcciones del permiso de la descarga cómo rocian, los escapes, y otras descargas accidentales a la superficie se manejarán. La facilidad no descarga wastewater para surgir ni aguas subterráneas. Todo malgasta engendrado será almacenado temporalmente en tanques o contenedores. El desecho envió offsite se dispondrá o será reciclado en un OCD aprobó el sitio. En caso de una descarga accidental, molió agua muy probable no se afectará. La profundidad estimada de la agua del suelo en el sitio se espera ser más que 50 pies. El suma se disolvió la concentración de sólidos de agua de suelo de área se espera estar en la gama de partes de 200-2,000 por millón.

Los comentarios o las indagaciones con respecto a este permiso o el proceso que permiten puede ser dirigido a:

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

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

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

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

April 4, 2005

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

RE: Discharge Permit Renewal Notice for Williams Field Services Facilities

Dear Ms. Garcia:

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

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

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

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

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

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

Sincerely,

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

cc: OCD Artesia District Office

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7-19-00,

or cash received on _____ in the amount of $ 3,450.00

from Williams Field Services Company

for La Cosa C.S. Glade C.S. GW-187, GW-320,
Richardson Stradale C.S Lawson C.S. Horton C.S. GW-321, GW-322, GW-323
(Facility Name) (OP No.)

Submitted by: _____ Date: 7-26-00

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility 4 Renewal 1 Renewal

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

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

Williams

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

70-2322/719
A/C 9401076

[redacted]

DATE: 07/19/2000

PAY TO THE ORDER OF:

PAY ➔ ******$3,450.00

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

SANTA FE NM 87504
United States

Bank One, NA
Illinois

Authorized Signer

MA 1353 (6/97)

COPYRIGHT & ANTI-FRAUD PROTECTION - PATENTS 4,910,365; 5,197,785; 5,340,169

[redacted]

AFFIDAVIT OF PUBLICATION

Ad No. 42724

STATE OF NEW MEXICO
County of San Juan:

ALETHIA ROTHLISBERGER, 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):

Sunday, April 30, 2000

And the cost of the publication is: $147.00

Alethia Rothlisberger

On 5/1/2000 ALETHIA ROTHLISBERGER appeared before me, whom I know personally to be the person who signed the above document.

Nancy L Slade

My Commission Expires April 10, 2004

E OF PUBLICATION

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

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

(GW-320) - Williams Field Services, Inc., Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84108-0900, has submitted a discharge plan application for their Richardson Straddle compressor station located in the SW/4 NE/4, Section 27, Township 32 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 115 gallons per day of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in above ground, closed-top fiberglass 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 ranging from 110 to 180 feet with a total dissolved solids concentrations ranging from approximately 450 mg/l to 2400 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-321) - Williams Field Services, Inc., Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Glade compressor station locted in the NW/4 SW/4, Section 30, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 58 gallons per day of produced water with a total dissolved solids concentration in excess of 3600 mg/l is stored in an above ground, closed-top fiberglass tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 94 feet with a total dissolved solids concentrations ranging from approximately 450 mg/l to 2400 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday 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 24th day of April, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
/s/Roger Andersen
for LORI WROTENBERRY, Director

SEAL

Legal No. 42724, published in The Daily Times, Farmington, New Mexico, Sunday, April 30, 2000.

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 Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of April, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
LORI WROTENBERY,
Director

Legal #67299
Pub. April 27, 2000

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 24th day of April, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 4/5/00,

or cash received on _____ in the amount of $ 200.00

from Williams Field Services

for Richard Straddle C.S. - GW-320 / Glade C.S. - GW-321 / Lawson C.S. - GW-322 / Horton C.S. (Facility Name) GW-323 — GW-320, GW-321, GW-322, GW-323 (OP No.)

Submitted by: M Ford Date: 4/11/00

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ___

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2000

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 GAS PROCESSING AS AGENT FOR BLANCO
1800 South Baltimore Avenue * P.O. Box 645 * Tulsa, OK 74101-0645

A/C 9401076

[redacted]

DATE: 04/05/2000

PAY TO THE ORDER OF:

PAY ********$200.00

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

SANTA FE NM 87504
United States

Bank One, NA
Illinois

Authorized Signer

MA-1353 (6/97)

COPYRIGHT ANTI-FRAUD PROTECTION - PATENTS 4,210,349; 4,227,788; 4,310,180; 5,197,796; 5,340,169

[redacted]

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
03-APR-00	20000403	0009148-TUL040004010		200.00

1/4 th

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
[redacted]	04/05/2000	40665	NEW MEXICO OIL CONSERVATION DI	$200.00

MA1353(WESAP001) (AP)

Williams

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

March 31, 2000

Ms. Lori Wrotenbery
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

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

Dear Ms. Wrotenbery:

Enclosed please find copies of Discharge Plan applications and check number 1000079599 for $200.00 to cover the filing fee for the following Williams Field Services (WFS) Compressor Stations:

- Richardson Straddle Compressor Station, San Juan County, New Mexico – GW-320
- Glade Compressor Station, San Juan County, New Mexico – GW-321
- Lawson Compressor Station, San Juan County, New Mexico – GW-322
- Horton Compressor Station, San Juan County, New Mexico – GW-323

Williams Field Services appreciates your assistance in handling this application. If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Ingrid Deklau
Environmental Specialist

Enclosures

XC: Denny Foust, Aztec OCD

DISCHARGE PLAN

TORRE ALTA GATHERING SYSTEM
RICHARDSON STRADDLE COMPRESSOR STATION

GW-320

Williams Field Services Company

March 2000

Table of Contents

List of Tables

List of Figures - All figures follow Section XI

List of Appendices

I. TYPE OF OPERATION

The Richardson Straddle Compressor Station will provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Kutz Plant.

II. LEGALLY RESPONSIBLE PARTY

Williams Field Services
295 Chipeta Way
Salt Lake City, Utah 84108
(801) 584-6543

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

III. LOCATION OF FACILITY

The Richardson Straddle Compressor Station will be located in the SE/4 SE/4 of Section 10, Township 31 North, Range 12 West, in San Juan County, New Mexico, approximately 7 miles northwest of Aztec, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangle: Adobe Downs Ranch, New Mexico) as Figure 1. The site for this station is 1.0 acre. The site boundary survey and facility layout are illustrated in Figure 2 and Figure 3. 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

>1000 <3000
Flat Fee
$690

V. FACILITY DESCRIPTION

Construction of the facility and installation of up to two Waukesha 7042 GL lean burn engines (site rated at 1380 HP each) is anticipated to begin in the first quarter of 2000. Facility startup is anticipated for the second quarter 2000. The units will be skid-mounted and self contained. This facility is classified as a field compressor station; consequently, the facility will be unmanned and there will be no formal office or other support facilities not essential to field compression at the site.

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. Material Safety Data Sheets for oil used in the equipment were previously provided to New Mexico Oil Conservation Division (NMOCD) by WFS. 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.

Sample	Parameters
Washdown Wastewater	pH, TDS, TOX, TPH, BETX, 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 used motor oil was suitable for recycling (see Appendix A). 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 this 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.

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

PROCESS FLUID/WASTE	SOURCE	QUANTITY (estimate)	QUALITY
Used Oil	Compressor	1200 gal/yr/engine	Used motor oil w/no additives
Natural Gas Condensate/Produced water	Scrubber, Gas Inlet Liquid Receiver	6000 bbl/yr	No additives
Waste Water	Drawn of Natural Gas Condensate Tank	1000 bbl/yr	No additives 115 gal/day
Wash-down Water	Compressor Skid	1200 gal/yr/engine	Soap and tap water w/traces of used oil 6.5 gal/day
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives
Used Oil Filters	Compressor	28/yr/engine	No additives

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

Table 2 describes the transfer, storage and disposal of process fluids, effluents, and waste solids expected to be generated at the site. The table also includes information regarding the type of container in which the waste stream will be stored, container capacity, and containment/spill prevention provisions.

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

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

PROCESS FLUID/WASTE	SOURCE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Natural Gas Condensate	Scrubber, gas inlet separator	Above Ground Storage Tank	300 bbl	Berm and liner	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Waste Water	Drawn off condensate tank	Above Ground Storage Tank	720 gal metal? closed top?	Berm and liner	Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Wash-down Water	Compressor skid	Below-ground sump, vaulted	320 gal	Metal water trough set on concrete pad	Non-exempt	Contractor may pump washwater back into truck after washing; water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Used Oil Filters	Compressor	Drum or other container	up to 100 gallons	Transported to POI or WFS facility in drum or other container	Non-exempt	Taken to POI or WFS consolidation point, drained, and ultimately transported for disposal at a Regional Landfill. A Waste Acceptance Profile will be filed with the landfill. Recycling options may be considered when available.
Used Absorbents	Incidental spills or leaks	Drum or other container	up to 100 gallons	Transported to WFS or POI facility in drum or other container	Non-exempt	Taken to WFS or POI consolidation point, drained, and ultimately transported for disposal at a Regional Landfill. A Waste Acceptance Profile will be filed at the landfill. Recycling options may be considered when available.
Spill Residue (i.e., soil, gravel)	Incidental spills	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases
Ambitrol/ Antifreeze	For use in compressor	Drum	55 gallons	Berm	N/A	N/A
Compressor Oil	For use in compressor	Day tank adjacent to each engine	500 gallons	Berm	N/A	N/A
Used Oil	Compressor	Day tank adjacent to each engine	500 gallons	Berm	Non-exempt	Hauled to WFS or POI consolidation point and then transported to EPA-registered used oil marketer for recycling.

VIII. INSPECTION, MAINTENANCE AND REPORTING

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 ground tanks will be gauged regularly, and monitored for leak detection. The facility will be remotely monitored for equipment malfunctions through Gas Dispatch and the WFS Torre Alta District.

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

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

Spill containment berms around above ground storage tanks will be designed to contain 1 1/3 times the volume of the tank. The below ground 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.

Prior to facility start-up, all pressure vessels on site will be tested in accordance with the requirement 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 procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix B. Significant spills and leaks are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix C).

X. SITE CHARACTERISTICS

The Richardson Straddle Compressor Station is located approximately 7 miles northwest of Aztec, New Mexico in the Farmington Glade. The site elevation is approximately 6,230 feet above mean sea level. The natural ground surface topography of the site slopes downward toward the north-northwest. The maximum relief over the site is approximately 14 feet.

The area is dissected by numerous washes, originating from the mesas east and west above the Farmington Glade. Intermittent flow from the site will follow the Farmington Glade drainage towards the southwest. The site is located approximately 8 miles east of the La Plata River. The La Plata River, at approximately 5800 feet in elevation, is the nearest down gradient perennial source of surface water to the site.

A review of the available hydrologic data[1,2] for this area revealed that there is one water well within a radius of one mile from the location of the Richardson Straddle Compressor Station. The nearest water well was found approximately 1/4 mile from the site in the SW/4 SE/4 SE/4 NE/4 Township 31 North, Range 7 West, Section 10. The limited data available on this well indicated that the well was drilled to a depth of 575 feet in the Nacimiento Formation. The well was located at an elevation of 6137 feet and is reported to be abandoned. Another well was located approximately 2 miles from the site in the SW/4 SE/4 SE/4 Township 31 North, Range 12 West, Section 1. The domestic well was drilled to a depth of 320 feet in an un-designated formation.

TDS? Ground water.

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

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

References

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

[2]Records of Water Wells in San Juan County, 1978-1983.

XI FACILITY CLOSURE PLAN

All reasonable and necessary measures will be taken to prevent the exceedence of WCQQ 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 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.

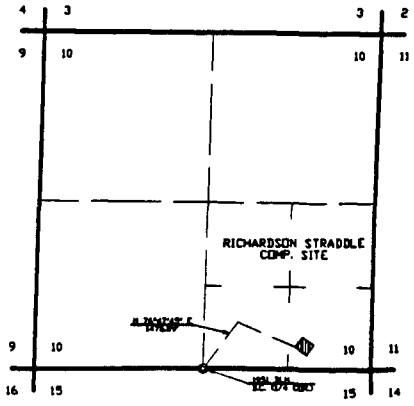
FIGURE 1 ADOBE DOWNS RANCH, NM QUAD

PLAT 6

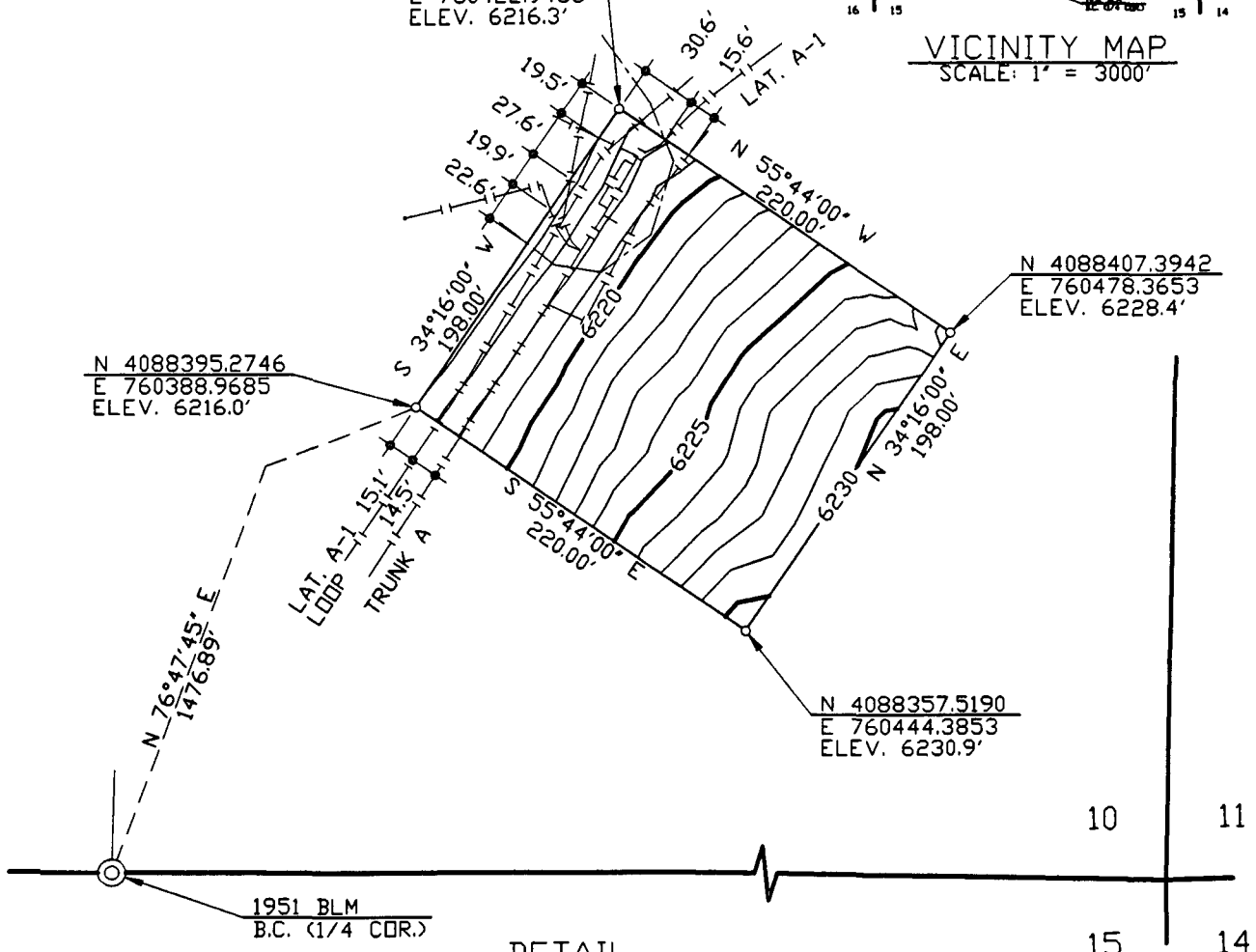
RICHARDSON STRADDLE COMPRESSOR SITE

1.000 ACRES

NOTE: BEARINGS ARE BASED ON A GRID BEARING ALONG THE WEST LINE OF THE NW1/4 OF SECTION 1, T-31-N, R-12-W, NMPM BEARS: S 2°22'29" W



VICINITY MAP
SCALE: 1" = 3000'



DETAIL
SCALE 1" = 100'

NOTES
1. ALL COORDINATES AS SHOWN ARE DERIVED FROM U.S.G.S. QUAD MAP. UTM COORDINATES, ZONE 12, IN METERS.
2. o DENOTES SET 5/8" REBAR
3. TBM IS TOP OF DOG LEG 91.6' N 52°16'13" E OF WEST CORNER OF SITE. ELEV.: 6223.0'

REVISION NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK.	APP.
1	5/14/98	JDB	ISSUED FOR REVIEW		FAO	RP							

INFO		DRAFTING	BY	DATE
SURVEYED:	4/20/98	DRAWN BY	JDB	5/14/98
R/W #:	03573	CHECKED BY	FAO	5/14/98
OWNERSHIP:	B.L.M.	APPROVED BY	RR	5/15/98
		ENGINEER	BY	DATE
		DESIGNED BY		
		PROJ. APPROVED	RP	6/12/98

STATE: NEW MEXICO
LOCATION: SAN JUAN

WILLIAMS GAS PROCESSING - BLANCO
ONE OF THE WILLIAMS COMPANIES

TORRE ALTA GATHERING SYSTEM
RICHARDSON STRADDLE COMPRESSOR SITE
SECTION 10, T-31-N, R-12-W, NMPM

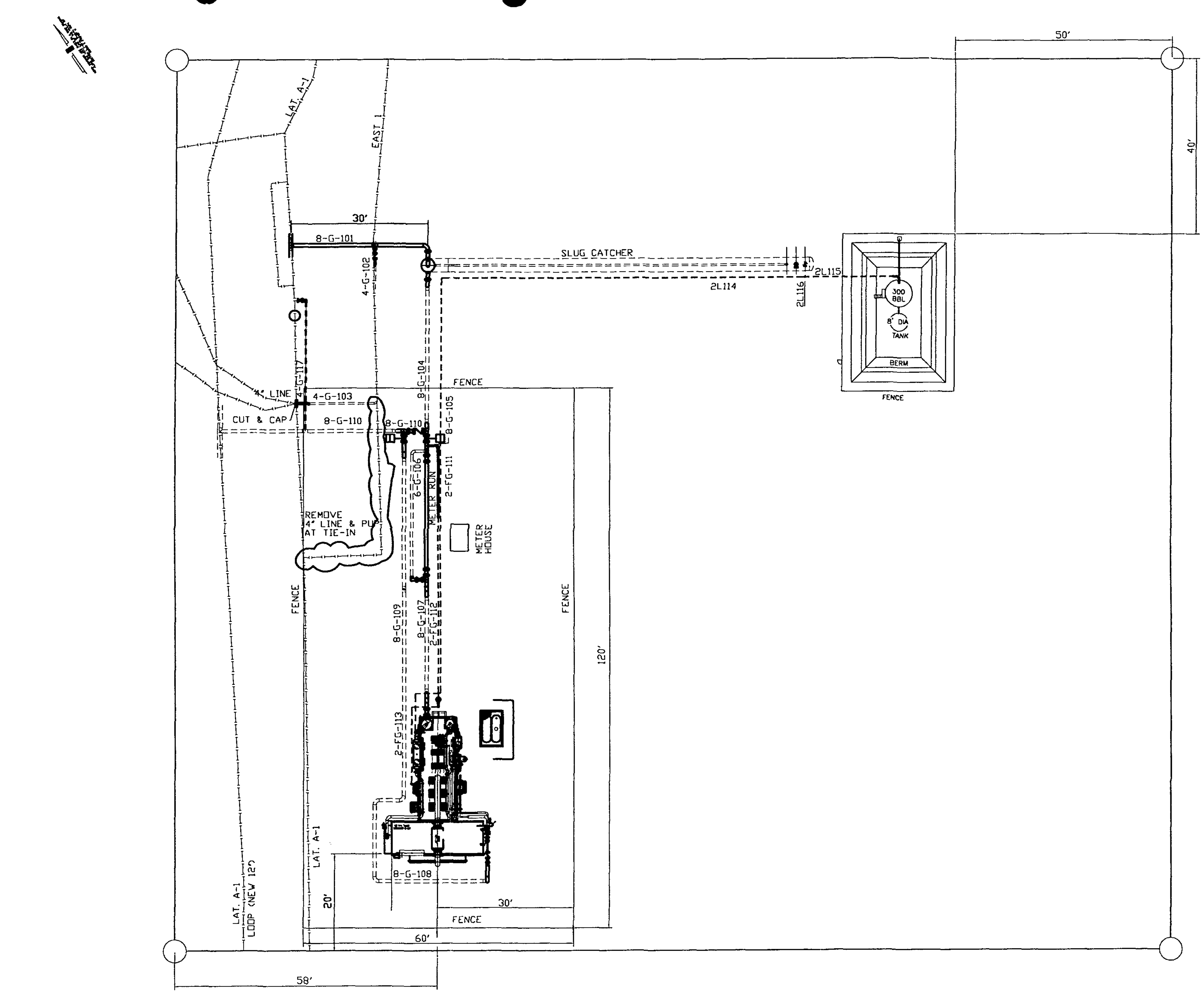
SCALE: AS NOTED
W.O. NO.

DWG NO. 799.9-X-16

SHEET 1 OF 1 | REV 1

S:\WFSDS\MAPPING\DRAWINGS\SANJUAN\799\09\7999-X-16_R01.DWG 05/14/1998 5:26PM JIMBO

FIGURE 3



NOTES:

1. ALL UNDERGROUND PIPING INSTALLED SHALL BE HAND CLEANED, PRIMED AND TAPED WITH POLYKEN PRODUCT PER THE SPECIFICATION IN THE CONTRACT DOCUMENTS.
2. ALL DIMENSIONS, ELEVATIONS AND DEPTHS TO BE FIELD VERIFIED.
3. ALL UNDERGROUND PIPING TO HAVE A MINIMUM OF 36" COVER
4. ALL PIPE COATING TO BE EXTENDED TO 6" ABOVE GRADE.
5. SLEEPERS SHALL BE INSTALLED UNDER EACH LINE UNDER RISERS.
6. ALL EXPOSED PIPING AND STEEL STRUCTURES SHALL BE PRIMED AND TWO COAT PAINTED PER THE CONTRACT SPECIFICATIONS.
7. ALL 3" AND LARGER PIPE SHALL BE 100% X-RAYED.
8. CONTRACTOR'S WORK SHALL COMPLY WITH DOT 192, ASME B31.8 AND API 1104
9. THE COMPRESSOR PAD CHAIN LINK FENCE WILL BE INSTALLED BY OTHERS. THE CONTRACTOR WILL PROVIDE MATERIALS FOR AND INSTALLATION OF THE HOG WIRE FENCE SURROUNDING THE CONDENSATE TANK SYSTEM.
10. THE COMPRESSOR WILL BE SET ON A PORTABLE CONCRETE PAD PROVIDED BY THE COMPANY. THE CONTRACTOR SHALL OVER EXCAVATE TO 2'-0" BELOW THE CONCRETE PAD BOTTOM AND 2'-0" BEYOND PAD EDGES. RECOMPACT PAD SOIL TO 95% PROCTOR DENSITY. THE PORTABLE PAD SHALL BE INSTALLED SUCH THAT INSTALLED PAD IS 6" ABOVE GRADE.
11. SITE WILL REQUIRE CONTOURING BY CONTRACTOR.
12. 2" BLOW DOWN VALVE SHALL BE BRACED PERPENDICULAR TO PIPE RUN.

DESIGN DATA	HYDROTEST REQUIREMENTS	MINIMUM X-RAY REQUIREMENTS
CLASS: 3 FACTOR: 0.5 MAOP: 720 PSIG	1110 PSIG MIN. - 1210 PSIG MAX. 4 HR. DURATION	100% - 3" AND ABOVE

WARNING: ABOVE REQUIREMENTS BASED ON NEW CONSTRUCTION, GRADE B MATERIAL. MINIMUM PIPE WALL THICKNESS STATED IN GATHERING FACILITY DESIGN STATEMENT, AND WFS QVI/CWI OBSERVING ACTUAL WELDING ANY VARIANCE MAY ALTER ABOVE REQUIREMENTS.

DRAFTING	BY	DATE
DRAWN BY	RJB	12/10/99
CHECKED BY	RJP	12/10/99
APPROVED BY		
ENGINEER	**BY**	**DATE**
DESIGNED BY		
PROJ. APPROVED		

STATE: NEW MEXICO
LOCATION: SAN JUAN

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

TORRE ALTA GATHERING SYSTEM
RICHARDSON STRADDLE COMPRESSOR
PLOT PLAN
SEC.10, T-31-N, R-12-W NMPM

SCALE: 1" NTS00'
W.O. NO. 15093
DWG NO. RIC-1-P1
SHEET 1 OF 1
REV

DRAWING NO.	TITLE	DRAWING NO.	TITLE

REFERENCE DRAWINGS

DRAWING NO.	TITLE	DRAWING NO.	TITLE

REFERENCE DRAWINGS

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

REVISIONS

APPENDIX A

WASTE ANALYSIS

Enseco Incorporated

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

Enseco
A Corning Company

ANALYTICAL RESULTS

FOR

NORTHWEST PIPELINE CORPORATION

ENSECO-RMAL NO. 024601

SEPTEMBER 21, 1992

Rocky Mountain
Analytical Laboratory

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

Enseco Incorporated
4955 Yarrow Street
Arvada, Colorado 80002
303/421-6611 Fax: 303/431-7171

ORGANIC ANALYSIS REPORT

AMERICAN WEST ANALYTICAL LABORATORIES

463 West 3600 South
Salt Lake City, Utah
84115

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

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

Contact: Mark Harvey
Date Analyzed: July 26,1995

Analysis Requested:
Volatile Aromatics
Total Purgeable Hydrocarbons

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

Field Sample ID:
SAN JUAN AREA
CEDAR HILL #1

Lab Sample ID:
L23218-8

Analytical Results

Units = mg/L (ppm)

BTX/TPH-P

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

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

Released By: _____
Laboratory Supervisor

Report Date: July 31,1995

INORGANIC ANALYSIS REPORT

AMERICAN WEST ANALYTICAL LABORATORIES

463 West 3600 South
Salt Lake City, Utah
84115

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

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

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

Analytical Results

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

Released by: _____
Laboratory Supervisor

Report Date 8/2/95

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:

- Sample Description Information
- Analytical Test Requests
- Analytical Results
- 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.

Enseco
A Corning Company

SAMPLE DESCRIPTION INFORMATION
for
Northwest Pipeline Corporation

Lab ID	Client ID	Matrix	Sampled Date	Sampled 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

Enseco
A Corning Company

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.

Enseco
A Corning Company

Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)

Method 8020

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

Enseco
A Corning Company

Benzene, Toluene, Ethyl Benzene and Xylenes (BTEX)

Method 8020

Client Name: Northwest Pipeline Corporation
Client ID: TRIP BLANK
Lab ID: 024601-0003-TB
Matrix: AQUEOUS Sampled: Unknown Received: 19 AUG 92
Authorized: 19 AUG 92 Prepared: NA 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

Enseco
A Corning Company

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

Enseco
A Corning Company

Metals

Total Metals

Client Name: Northwest Pipeline Corporation
Client ID: WASTE OIL TANK CEDAR HILL
Lab ID: 024601-0002-SA
Matrix: WASTE Sampled: 18 AUG 92 Received: 19 AUG 92
Authorized: 19 AUG 92 Prepared: See Below 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

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

Enseco
A Corning Company

General Inorganics

Client Name: Northwest Pipeline Corporation
Client ID: WASTE OIL TANK CEDAR HILL
Lab ID: 024601-0002-SA
Matrix: WASTE Sampled: 18 AUG 92 Received: 19 AUG 92
Authorized: 19 AUG 92 Prepared: See Below 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).

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

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.

Enseco
A Corning Company

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

Enseco
A Corning Company

DUPLICATE CONTROL SAMPLE REPORT
Organics by Chromatography

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

Enseco
A Corning Company

SINGLE CONTROL SAMPLE REPORT
Organics by Chromatography

Analyte	Concentration Spiked	Measured	Accuracy(%) 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.

Enseco
A Corning Company

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

Enseco
A Corning Company

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

Enseco
A Corning Company

DUPLICATE CONTROL SAMPLE REPORT
Metals Analysis and Preparation

Analyte	Concentration Spiked	Measured DCS1	Measured DCS2	Measured AVG	Accuracy Average(%) DCS	Accuracy Limits	Precision (RPD) DCS	Precision 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	2
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	2

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

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A Corning Company

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

Analyte	Concentration Spiked	Measured DCS1	Measured DCS2	Measured AVG	Accuracy Average(%) DCS	Accuracy Limits	Precision (RPD) DCS	Precision (RPD) 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	2
Magnesium	3740	3250	3480	3360	90	74-126	7.0	2
Manganese	423	376	397	387	91	74-125	5.5	2
Molybdenum	159	145	152	148	93	71-129	5.1	2
Nickel	166	154	162	158	95	67-133	5.1	2
Potassium	4050	3530	3770	3650	90	68-132	6.6	2
Silver	104	98.2	106	102	98	76-124	7.6	2
Sodium	747	717	766	741	99	57-130	6.6	2
Vanadium	154	135	142	138	90	73-127	5.2	2
Zinc	530	478	504	491	93	65-135	5.3	2

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

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

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

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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

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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	-

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DUPLICATE CONTROL SAMPLE REPORT
Wet Chemistry Analysis and Preparation

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

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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

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A Corning Company

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

CHAIN OF CUSTODY

ENSECO CLIENT

PROJECT

SAMPLING COMPANY

SAMPLING SITE

TEAM LEADER

SAMPLE SAFE™ CONDITIONS

PACKED BY

SEAL NUMBER

SEAL INTACT UPON RECEIPT BY SAMPLING COMPANY

CONDITION OF CONTENTS

SEALED FOR SHIPPING BY

INITIAL CONTENTS TEMP. °C

SEAL NUMBER

SAMPLING STATUS ☐ Done ☐ Continuing Until

SEAL INTACT UPON RECEIPT BY LAB ☐ Yes ☐ No

CONTENTS TEMPERATURE UPON RECEIPT BY LAB JM °C

DATE	TIME	SAMPLE ID/DESCRIPTION	SAMPLE TYPE	# CONTAINERS	ANALYSIS PARAMETERS	REMARKS
8-18-92	12:49	CEDAR HILL CDP WATER TANK WASTE	LIQUID AQUEOUS	1	PH / TDS	01
8-18-92	12:50	" "	LIQUID AQUEOUS	1	PH / TDS	02
8-18-92	12:45	" "	LIQUID METALS	4T	METALS	01 01
8-18-92	12:47	" "	LIQUID METALS	4T	METALS	02
8-18-92	12:40	" "	LIQUID	15	TOX -- SINGLE	01
8-18-92	12:40	" "	LIQUID	15	TOX -- SINGLE	02
8-18-92	11:30	WASTE OIL TANK CEDAR HILL	USED OIL			
8-18-92	11:45	WASTE OIL TANK CEDAR HILL	USED OIL			02
8-18-92	11:50	WASTE OIL TANK CEDAR HILL	USED OIL			
8-18-92	12:00	WASTE OIL TANK CEDAR HILL	USED OIL			

CUSTODY TRANSFERS PRIOR TO SHIPPING

RELINQUISHED BY (SIGNED)	RECEIVED BY (SIGNED)	DATE	TIME
Vern [illegible]	Frank [illegible]	8/18/92	2:07

SHIPPING DETAILS

DELIVERED TO SHIPPER BY

METHOD OF SHIPMENT

AIRBILL NUMBER

RECEIVED FOR LAB PMM

SIGNED [signature]

DATE/TIME 0845 8/19/92

ENSECO PROJECT NUMBER 24601

ENS-1133 White - CLIENT Pink - LAB

Enseco
A Corning Company

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

CHAIN OF CUSTODY

ENSECO CLIENT

PROJECT

SAMPLING COMPANY

SAMPLING SITE

TEAM LEADER

SAMPLE SAFE™ CONDITIONS

PACKED BY

SEAL NUMBER

SEAL INTACT UPON RECEIPT BY SAMPLING COMPANY

CONDITION OF CONTENTS

SEALED FOR SHIPPING BY

INITIAL CONTENTS TEMP. °C

SEAL NUMBER

SAMPLING STATUS ☐ Done ☐ Continuing Until

SEAL INTACT UPON RECEIPT BY LAB. ☐ Yes ☐ No

CONTENTS TEMPERATURE UPON RECEIPT BY LAB. °C

DATE	TIME	SAMPLE ID/DESCRIPTION	SAMPLE TYPE	# CONTAINERS	ANALYSIS PARAMETERS	REMARKS
8-18-92	12:51	CEDAR HILL COP WASTE WATER	LIQUIDS AQUEOUS	11	VOA	> 01
8-18-92	12:53	" "	LIQUIDS AQUEOUS	11	VOA	
8-18-92	12:55	" "	LIQUIDS AQUEOUS	11	VOA	

CUSTODY TRANSFERS PRIOR TO SHIPPING

RELINQUISHED BY (SIGNED)	RECEIVED BY (SIGNED)	DATE	TIME

SHIPPING DETAILS

DELIVERED TO SHIPPER BY

METHOD OF SHIPMENT

AIRBILL NUMBER

RECEIVED FOR LAB: FINAL

SIGNED

DATE/TIME: 8/19/92 0845

ENSECO PROJECT NUMBER: 24601

ENS—1133

White – CLIENT Pink – LAB

APPENDIX B

SPILL CONTROL PROCEDURES

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

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▸Document History (ISO9001)

▾Document Body

A. PURPOSE AND SCOPE

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

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

B. CONTENTS

C. POLICY

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

D. PROCEDURE

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

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

C. POLICY

C.1 GENERAL

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

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

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

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

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

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

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

d. Section 112 of the Clean Air Act

e. Section 7 of the Toxic Substance Control Act

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

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

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

a. Non-Transportation Related Facilities

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

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

b. Transportation Related Facilities

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

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

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

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

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

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

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

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

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

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

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

C.2 BULK STORAGE TANKS

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

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

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

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

C.3 FACILITY DRAINAGE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

D. PROCEDURE

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

Any Employee

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

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

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

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

III. Releases of Certain Other Materials Reportable:

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

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

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

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

NOTE 2: Refer to Attachment A for containment procedures.

Facility Superintendent, Controller or Designee

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

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

Gas Control Personnel

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

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

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

Facility Superintendent

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

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

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

Environmental Affairs

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

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

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

cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Superintendent or Designee

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

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

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

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

ATTACHMENT A

DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS

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

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

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APPENDIX C

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

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

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

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

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 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]