

GW - 320

**PERMITS,
RENEWALS,
& MODS
Application**

Cirrus Consulting, LLC

February 16, 2010

RECEIVED OCD
2010 FEB 18 P 2:19

Mr. Glen von Gonten
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Subject: Four Discharge Plan Renewal Applications
Williams Four Corners, LLC GW-320, 321, 322 and 323

Dear Mr. von Gonten:

On behalf of Williams Four Corners, LLC, Cirrus Consulting, LLC submitted the Discharge Plan renewal applications for the following facilities via email to you on February 15, 2010:

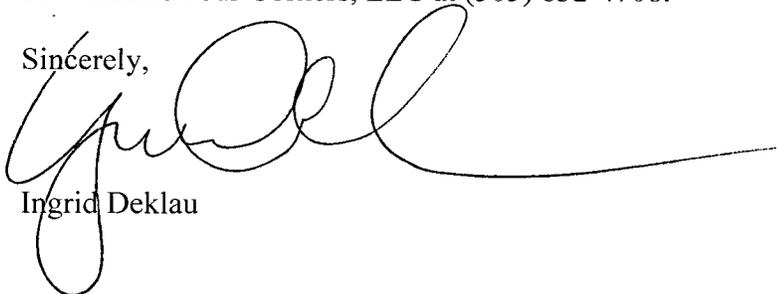
- Richardson Straddle Compressor Station (GW-320) ✓
- Glade Compressor Station (GW-321)
- Lawson Straddle Compressor Station (GW-322)
- Horton Straddle Compressor Station (GW-323)

A copy of the email was also forwarded to Brandon Powell, OCD District 3.

Enclosed please find a check for \$400 to cover the filing fees for the applications.

If any additional information is needed, please contact me at the number below or Aaron Dailey of Williams Four Corners, LLC at (505) 632-4708.

Sincerely,



Ingrid Deklau

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 2/16/10

or cash received on _____ in the amount of \$ 100.00

from Cirrus Consulting LLC

for GW-320

Submitted by: Kimberly R Sanchez Date: 2/19/10

Submitted to ASD by: Kimberly R Sanchez Date: 2/19/10

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-320
WILLIAMS FIELD SERVICES
RICHARDSON STRADDLE COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(August 29, 2005)

1. Payment of Discharge Permit Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated June 29, 2005 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Permit: Williams Field Services shall maintain storm water runoff controls. As a result of Williams Field Services' operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

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

Accepted:

WILLIAMS FIELD SERVICES

by David Bay

SR. ENV. SPECIALIST

Title

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

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

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

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

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

New Renewal Modification

1. Type: Compressor Station (Richardson Compressor Station, GW-320)
2. Operator: Williams Field Services Company
Address: 188 CR 4900, Bloomfield, NM 87413
Contact Person: David Bays Phone: 505-634-4951
3. Location: Section 10 Township 31 North Range 12 West
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: David Bays

Title: Sr. Environmental Specialist

Signature: David Bays

Date: 06/29/2005

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



Richardson Straddle
Compressor Station

NMOCD
Discharge Plan
GW-320

Williams Field Services
188 CR 4900
Bloomfield, NM 87413



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1.0 TYPE OF OPERATION

The Richardson Straddle Compressor Station was constructed in 2000 to provide various producers with natural gas gathering, compression, treatment, and delivery services through the Williams Field Services system.

2.0 LEGALLY RESPONSIBLE PARTY

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

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

3.0 LOCATION OF FACILITY

The facility is located in Section 10, Township 31 North, Range 12 West, in San Juan County, New Mexico, approximately 7.5 miles northwest of Aztec, New Mexico. The facility latitude and longitude are North $36^{\circ} 54.424,80'$ and West $108^{\circ} 4.684,38'$. A site location map is attached (USGS 7.5 Min. Quadrangles: Adobe Downs Ranch, New Mexico) as Figure 1.

4.0 LANDOWNER

Williams Field Services is leasing the subject property from:

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

5.0 FACILITY DESCRIPTION

This facility is a field compressor station and is un-manned. The site has been permitted to allow operation of three compressor engines. Site-rated horsepower is 1380 for two of the units, and 1349 for one of the units. Currently, only one of the 1380 hp engines exists at the site. Compressors may be installed or removed to meet demand. The facility layout is illustrated in Figure 2.

6.0 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.



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

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and waste water. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

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

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

8.0 STORM WATER PLAN

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

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

8.1 Site Assessment and Facility Controls

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

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



8.2 Best Management Practices

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

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

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

9.0 INSPECTION, MAINTENANCE AND REPORTING

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

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

10.0 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

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

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



11.0 SITE CHARACTERISTICS

The Richardson Straddle Compressor Station is located approximately 7.5 miles northwest of Aztec, New Mexico in the Farmington Glade. The site elevation is approximately 6230 feet above sea level. The natural ground surface topography slopes downward toward the northwest. The maximum relief over the site is approximately 15 feet. Site drainage is to the northwest, approximately 1200 feet, to the Farmington Glade.

The area is dissected by numerous washes, originating from the mesas east and west above the Farmington Glade. Intermittent flow from the site would likely follow the Farmington Glade drainage toward the southwest.

The nearest downgradient perennial source of surface water is the San Juan River at the southernmost reach of the Farmington Glade. It is located approximately 15 miles from the site, at an elevation of approximately 5240 feet.

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 and five additional wells within a radius of two miles. The nearest water well was found approximately 1/2 mile from the site in the SW/4 SE/4 NE/4 Township 31 North, Range 12 West, Section 10. The limited data available on this well indicated that the depth to water was 57.5 feet in the Nacimiento Formation. The well was located at an elevation of 6137 feet and is reported to be abandoned. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 200-2,000 mg/l.

The table below presents available information provided for each of the six wells.

Township; Range; Section	Quarter ^a	Apx. Distance from Site (mi)	Well #	Use ^b	Well Depth (ft)	Water Bearing Stratifications (ft)	Description	Depth to Water (ft)
31N; 12W; 10	3442	~0.5	--	--	--	--	Nacimiento Formation	57.5
31N; 12W; 01	434	~2	SJ 01649	dom	220	180-220	Sandstone/Gravel/Conglomerate	161
31N; 12W; 01	433	~2	SJ 01660	dom	320	275-320	Other/Unknown	275
31N; 12W; 01	43	~1.75	SJ 02034	dom	85	67-70	Sandstone/Gravel/Conglomerate	55
31N; 12W; 01	44	~2	SJ 02099	dom	95	--	--	--
31N; 12W; 08	444	~1.75	SJ 02904	dom	325	270-325	Blue Sandstone	142

Note a: 1=NW/4; 2=NE/4; 3=SW/4; 4=SE/4

Note b: dom = domestic

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

References

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

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



12.0 FACILITY CLOSURE PLAN

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

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

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

TABLES

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

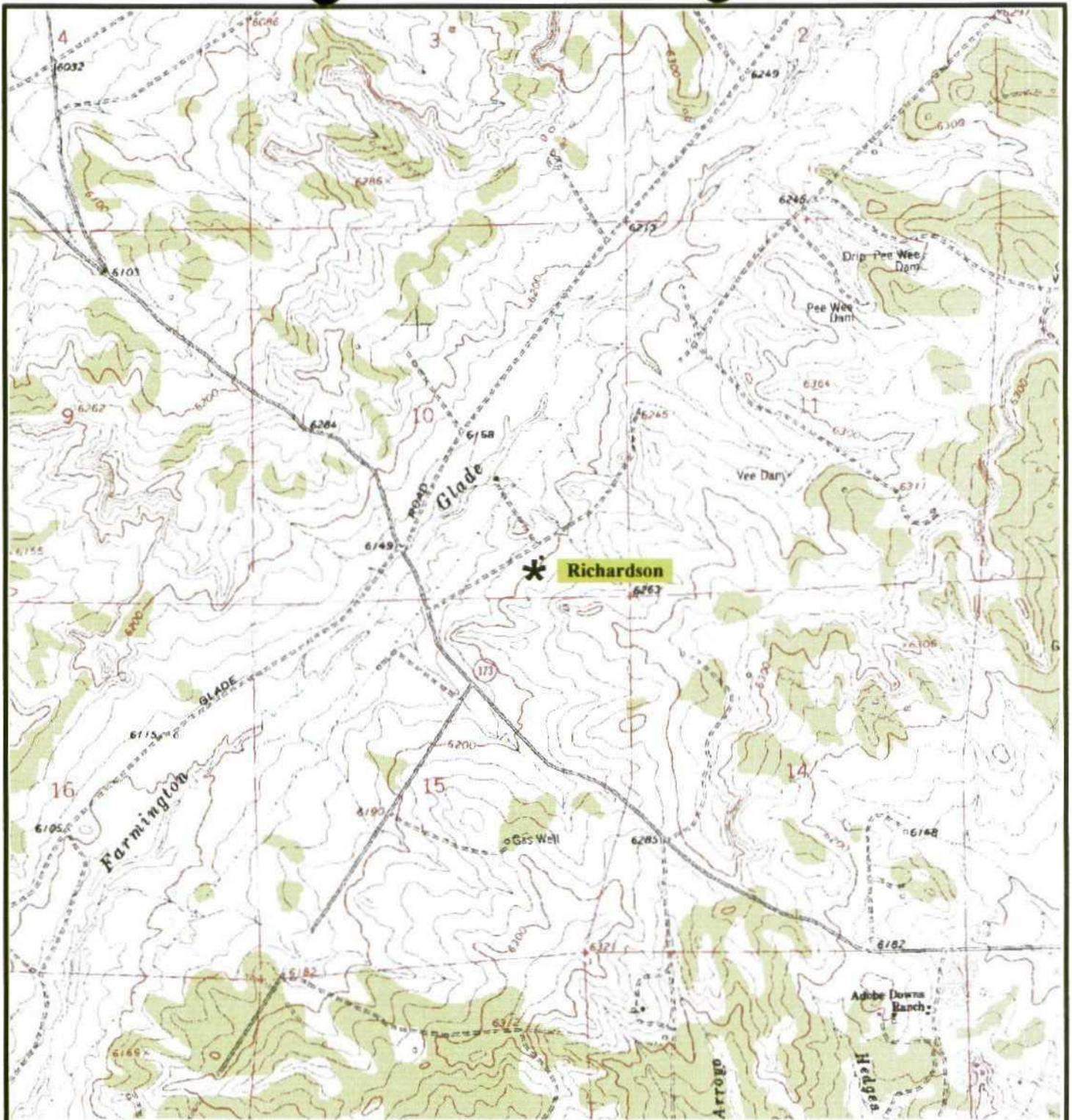
PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	100-500 gallons/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	20-60/year/engine	No Additives
Condensate/Produced Water	Liquid receiver and scrubber	200-3000 barrels/year	No Additives
Produced Water	Liquid receiver and scrubber	200-3000 barrels/year	May contain trace lube oil
Waste Water	Compressor Skid	500-3000 gallons/year/engine	Biodegradable soap and tap water w/ traces of oil
Used Process Filters	Air	25-100/year	No Additives
Empty Drums/Containers	Liquid Containers	0-20/year	No Additives
Spill Residue (i.e. soil, gravel, etc)	Incident Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incident Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Hauled upon draining	N/A	Catch basin	Non-exempt	Transported to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Condensate/Produced Water	Above Ground Storage Tank	12,600 gal	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Produced Water	Above Ground Storage Tank	1000 gal	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Waste Water	Above Ground Storage Tank	-a-	Concrete vault	Non-Exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm or transported to a Williams or Contractor facility.	Non -exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Spill Residue (i.e., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Lube Oil	Above Ground Storage Tank	500 gal tank for each engine	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

a: Tank to be replaced by December 31, 2005

FIGURES



Source: USGS Adobe Downs Ranch, New Mexico Quadrangle

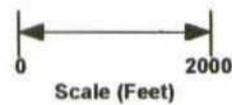


Figure 1 Site Vicinity / Topographic Map
Richardson Straddle Compressor Station
 Section 10, Township 31N Range 12W
 San Juan County, New Mexico

APPENDICES

Appendix A
WFS Spill Control Procedures

RELEASE/SPILL REPORTING

MATERIAL SAFETY DATA SHEETS

CHEMICAL EXPOSURES/POISONINGS

Dial

24HRS/DAY - 7DAYS/WEEK

1-888-677-2370

Info you should have when calling:

- Time of Release/Spill
- Location of the Release
- Asset where Release Occurred
- Amount Released
- Name of Chemical or Product Released



3E COMPANY

1905 Aston Avenue, Carlsbad, CA 92008

Telephone: 760-602-8700

Fax: 760-602-8888

Release/Spill Report Form

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

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

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

 Origin Of Release:

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

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

1.0 PURPOSE

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

Note 1:

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

Note 2:

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

2.0 PROCEDURE

2.1 Offshore Release Reporting (w/sheen on water)

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

2.1.1.1 Any release that causes sheen on water.

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

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

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

2.2.1.1 Any Gas release >50 MSCF;

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

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

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

2.3 Onshore Releases

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

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

Note:**Flares and Thermal Oxidizers**

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

2.4 Planned / Scheduled Blowdowns

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

2.4.3 The Environmental Specialist will:

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

2.5 Exceptions to Procedure:

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

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

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

2.6 Release Database

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

3.0 REFERENCES

3.1 Regulatory

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

3.1.2 49 CFR 191, 192 and 195

3.2 Related Policies/Procedures

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

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

4.0 DEFINITIONS

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

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

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

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

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

➤➤➤End of Procedure<<<

System Integrity Plan Change Log

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

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

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

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

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

1.0 PURPOSE

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

2.0 PROCEDURE

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

describes the procedures for responding to a spill.

NOTE

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

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

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

3.0 REFERENCES

3.1 Regulatory

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

3.2 Related Policies/Procedures

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

3.3 Forms and Attachments

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

4.0 DEFINITIONS

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

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

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

4.17 USCG – United States Coast Guard

➤➤➤End of Procedure◀◀◀

System Integrity Plan Change Log

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

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

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

Appendix B
NMOCD Notification and Corrective Action

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

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

LOCATION OF RELEASE

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

Latitude _____ Longitude _____

NATURE OF RELEASE

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

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

OIL CONSERVATION DIVISION

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

* Attach Additional Sheets If Necessary

Appendix C
Public Notice



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

August 29, 2005

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

Mr. David Bays
Williams Field Services
188 CR 4900
Bloomfield, New Mexico 87413

**RE: Discharge Permit Renewal GW-320
Williams Field Services
Richardson Straddle Compressor Station
San Juan County, New Mexico**

Dear Mr. Bays:

The ground water discharge permit renewal application GW-320 for the Williams Field Services Richardson Straddle Compressor Station located in the SW/4 NE/4 of Section 10, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge permit application was submitted on March 31, 2000 and approved June 27, 2000. The discharge permit renewal application letter, dated June 29, 2005, submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge permit is renewed pursuant to 20 NMAC 3106.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provides for possible future amendment or modifications of the permit. Please be advised that approval of this permit does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

Please note that 20 NMAC 3104 of the regulations provides: "When a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to 20 NMAC 3107.C., Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Mr. David Bays
GW-320 Richardson Straddle Compressor Station
August 29, 2005
Page 2

Pursuant to 20 NMAC 3109.G.4., this renewal permit is for a period of five years. This renewal will expire on **June 27, 2010**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge permit facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge permit .

The discharge permit renewal application for the Williams Field Services Richardson Straddle Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a fee equal to the filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The OCD has received the filing fee.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-320
WILLIAMS FIELD SERVICES
RICHARDSON STRADDLE COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(August 29, 2005)

1. Payment of Discharge Permit Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated June 29, 2005 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Permit: Williams Field Services shall maintain storm water runoff controls. As a result of Williams Field Services' operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services shall also take immediate corrective actions pursuant to Item 12 of these conditions.

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

Accepted:

WILLIAMS FIELD SERVICES

by _____

Title

OCD copy

ATTACHMENT TO THE DISCHARGE PLAN GW-320
WILLIAMS FIELD SERVICES
RICHARDSON STRADDLE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS

(June 27, 2000)

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a flat fee assessed for compressor stations with horsepower rating greater than 1001 horsepower but less than 3000 horsepower equal to \$690.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated March 31, 2000 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

OCD copy

ATTACHMENT TO THE DISCHARGE PLAN GW-320
WILLIAMS FIELD SERVICES
~~RICHARDSON~~ STRADDLE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(June 27, 2000)

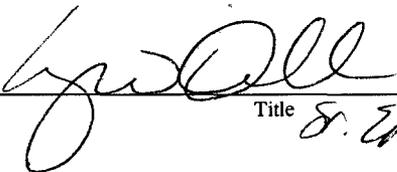
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2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated March 31, 2000 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
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5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

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

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

Accepted:

WILLIAMS FIELD SERVICES

by 
Title *S. Emmett Spivey*



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

June 27, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9658

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

**RE: Discharge Plan Approval GW-320
Williams Field Services
Richardson Straddle Compressor Station
San Juan County, New Mexico**

Dear Ms. Deklau:

The ground water discharge plan GW-320 for the Williams Field Services Richardson Straddle Compressor Station located in the SE/4 SE/4 of Section 10, Township 31 North, Range 12 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The original discharge plan application was submitted on March 31, 2000 pursuant to Section 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Ms. Ingrid Deklau
GW-320 Richardson Straddle Compressor Station
June 27, 2000
Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **June 27, 2005**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

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

The discharge plan application for the Williams Field Services Richardson Straddle Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of \$50. There is a flat fee assessed for compressor stations with horsepower rating greater than 1001 horsepower but less than 3000 horsepower equal to \$690.00. The OCD has received the filing fee.

**Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505.**

If you have any questions please contact Mr. W. Jack Ford at (505) 827-7156. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,


Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-320
WILLIAMS FIELD SERVICES
RICHARDSON STRADDLE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(June 27, 2000)

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a flat fee assessed for compressor stations with horsepower rating greater than 1001 horsepower but less than 3000 horsepower equal to \$690.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated March 31, 2000 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
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11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.

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

17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by _____
Title