

GW - 328

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

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2006 - 2000

RECEIVED

2007 NOV 13 AM 11 55



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

November 7, 2007

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

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

Dear Mr. Lowe,

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

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

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

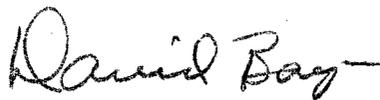
Please see the attached Table 1 and Table 2, from the recent OCD Discharge Plan renewal application for Williams' Rosa Compressor Station, for an example of how the updates apply at a typical Williams' facility. The updated information is indicated by bold text. We will update this information in each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

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

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

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

Respectfully submitted,



David Bays  
Senior Environmental Specialist

Attachment

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

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

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

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

<b>PROCESS FLUID / WASTE</b>	<b>SOURCE</b>	<b>QUANTITY (Ranges)</b>	<b>QUALITY</b>
Produced Water/Natural Gas Condensate	<b>Inlet Scrubber, Gas Inlet Separator, Dehydrators</b>	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
<b>Used Process Filters</b>	<b>Charcoal, Activated Carbon, Molecular Sieve</b>	<b>50-500 cubic yd/yr</b>	<b>No Additives</b>
Used Process Filters	<b>Air, Inlet, Fuel, Fuel Gas, Glycol, Amine, Ambitrol</b>	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,

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

David Bays  
Senior Environmental Specialist

Attachments

xc: Clara Cardoza  
Monica Sandoval  
WFS FCA file 210



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

March 17, 2006

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

**Re: Discharge Plan GW-060, -061, -233, -327, -328, -330 and -331**

Dear Mr. Ford:

Enclosed please find the signed copy of the discharge plan conditions for the following Williams Field Services (WFS) sites:

- Milagro Plant (GW-60)
- Horse Canyon CS (GW-61)
- La Jara CS (GW-233)
- Blanco CS (GW-327)
- Thompson CS (GW-328)
- Dogie CS (GW-330)
- Chaco CS (GW-331)

Also included is check 4027012911 for \$14,200.00 to cover the flat fee required by the approval conditions for all sites.

*Williams Field Services appreciates your assistance in handling these approvals and processing the fees. If you have any questions or require additional information, please contact me at 505/632/4606.*

Thank you,

Clara M. Cardoza  
Environmental Compliance

enclosures

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/14/06

or cash received on \_\_\_\_\_ in the amount of \$ 1700<sup>00</sup>

from Williams Field Services Co

for Chaco CS GW-331

Submitted by: Lawrence Rancos (Facility Name) Date: 3/21/06

Submitted to ASD by: Lawrence Rancos Date: 3/21/06

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 \_\_\_\_\_

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



WILLIAMS FIELD SERVICES COMPANY  
PO Box 212 E  
Tulsa, OK 74121-1218  
Customer Support 1-866-778-2665

JPMorgan Chase Bank, N.A.  
Chicago, IL

119-2312-719  
N/C 940116

DATE: 03/14/2006

PAY TO THE ORDER OF

PAY  $\rightarrow$  \$\*\*\*\*\*14,200.00  
USD

WATER MANAGEMENT QUALITY MANAGEMENT FUND  
C/O OIL CONSERVATION DIV  
1220 S ST FRANCIS DR

SANTA FE  
UNITED STATES

NM 87505

*Lawrence Rancos*  
Authorized Signer

SUPPLIER NUMBER  
400443

GW-60 GW-61 GW-233 GW-327 GW-328 GW-330 GW-331



# AFFIDAVIT OF PUBLICATION

Ad No. 52868

## 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):

Thursday, January 26, 2006.

And the cost of the publication is \$248.28.

Connie Pruitt

ON 1/30/06 CONNIE PRUITT  
appeared before me, whom I know personally  
to be the person who signed the above  
document.

Wynell Corey  
My Commission Expires November 17, 2008.

## COPY OF PUBLICATION

918

Legals

### NOTICE OF PUBLICATION

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

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

(GW-060) - Williams Field Service, Clara Cardoza, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Milagro Gas Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 gallons per day of process waste water will be disposed of in open top evaporation tanks with a synthetic impervious liner and leak detection system. 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 40 feet with a total dissolved solids concentrations of 5800 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-061) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Horse Canyon compressor station located in the NE/4 NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top 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 380 feet with a total dissolved solids concentrations of approximately 3150 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-327) - Williams Field Service, Mark J. Baretz, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Blanco compressor station located in the NW/4 SW/4, Section 32, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. All effluents generated on site are 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 100 to 150 feet with a total dissolved solids concentrations ranging from 200 to 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-328) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Thompson compressor station located in the SE/4 SE/4, Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top 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 approximately 90 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-331) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Chaco compressor station located in the SE/4 SW/4, Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top 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 approximately 200 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-343) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Hare Compressor Station located in the SE/4 NW/4, Section 24, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of produced water is collected in a covered below grade vaulted 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 20 feet with a total dissolved solids concentrations

**NOTICE OF PUBLICATION**

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

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

**(GW-060) - Williams Field Service, Clara Cardoza, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Milagro Gas Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 gallons per day of process wastewater will be disposed of in open top evaporation tanks with a synthetic impervious liner and leak detection system. 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 40 feet with a total dissolved solids concentrations of 5800 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-061) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit renewal application for their Horse Canyon compressor station located in the NE/4 NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 55 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top 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 380 feet with a total dissolved solids concentrations of approximately 3150 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

**(GW-327) - Williams Field Service, Mark J. Baretts, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Blanco compressor station located in the NW/4 SW/4, Section 32, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. All effluents generated on site are 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 100 to 150 feet with a total dissolved solids concentrations ranging from 200 to 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-328) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Thompson compressor station located in the SE/4 SE/4, Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD approved off-site disposal facility. The discharge permit ad-**

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 approximately 90 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

**(GW-331) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Chaco compressor station located in the SE/4 SW/4, Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top 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 approximately 200 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-343) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Hare Compressor Station located in the SE/4 NW/4, Section 24, Township 29 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of produced water is collected in a covered below grade vaulted tank prior to transport to an OCD approved off-site disposal facility. The dis-**

charge 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 20 feet with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

**(GW-233) - Williams Field Service, Mark J. Baretts, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their La Jara compressor station located in the NW/4 NW/4, Section 17, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. All waste water is collected and stored in an above ground bermed closed top 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 approximately 325 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.**

**(GW-330) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Dogie compressor station located in the NW/4 NW/4, Section 4, Township 25 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD ap-**

positional 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 15 to 20 feet with a total dissolved solids concentrations ranging from 2400 to 2500 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

**(GW-002) - Duke Energy Field Services, LP, Mr. Tony R. Lee, Asset Manager, 1625 West Marland, Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Snakebite Booster Station located in the SE/4 SW/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Current facility operations are limited to ground water remedial operations and removal of minimal pipeline liquids from the natural gas gathering system. The operator does not propose to discharge effluent or waste solids on site, all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable state and federal regulations. Groundwater most likely to be affected by an accidental discharge is at a depth of 85 feet with a total dissolved solids concentration of 600 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.**

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

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 comment 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 presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 15 day of December 2005.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL MARK FEISMIL P.E., Director  
Legal #78314  
Pub. January 27, 2006



Environmental Department  
188 County Road 4900  
Bloomfield, NM 87413  
(505) 634-4951  
Fax (505) 632-4781

December 9, 2005

New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505



Dear Sirs:

Please find enclosed the original plus one copy of the Discharge Plan renewal applications for the Williams Field Services Co. ("WFS") Hare, Horse Canyon and Thompson Compressor Stations. Also enclosed is WFS check number 4027007383 in the amount of \$300.00 in payment of the filing fee (\$100.00 per facility).

If you need any additional information please call me at (505) 634-4951, or Ms. Monica Sandoval at (505) 632-4625.

Sincerely yours,

David Bays, REM  
Sr. Environmental Specialist

cc: w/ attachment  
Mr. Denny Foust - OCD - Aztec  
File 220 - Hare Station  
File 220 - Horse Canyon Station  
File 220 - Thompson Station



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**

Cabinet Secretary

October 3, 2003

**Lori Wrotenberg**

Director

**Oil Conservation Division**

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

**RE: Landfarm Operation  
Thompson Compressor Station GW-328  
San Juan County, New Mexico**

Dear Mr. Lane:

The New Mexico Oil Conservation Division (OCD) is in receipt of Williams Field Services Company's request, dated September 29, 2003, to establish a landfarm operation at the Thompson Compressor station located in the SE/4 SE/4 Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico. Based upon the information received the request for landfarm operations is **hereby approved subject to the following stipulations:**

- a. Disposal may occur only when an attendant is on duty. The landfarm facility must be secured when no attendant is present at the site.
- b. All contaminated soils received at the facility must be spread and disked within 72 hours of receipt.
- c. Soils must be spread on the surface in twelve (12) inch lifts or less.
- d. Moisture must be added as necessary to enhance bioremediation and to control blowing dust. There may be no ponding/pooling or run-off of water allowed. Any ponding of precipitation must be removed within twenty-four (24) hours of discovery.
- e. Landfarm inspection and maintenance must be conducted on a timely basis or immediately following a consequential rainstorm or windstorm.
- f. The facility is authorized to accept only exempt and "non-hazardous" non-exempt oilfield wastes that are generated in the state of New Mexico by Williams Field Services Company on Williams Field Services Company's facilities.

Mr. Michael K. Lane  
Thompson Compressor Station GW-328  
October 3, 2003  
Page 2

- g. At no time may any OCD-permitted surface waste management facility accept wastes that are hazardous by either listing or characteristic testing.
- h. No free liquids or soils with free liquids may be accepted at the facility.
- i. Soils must be disked a minimum of once every two weeks (biweekly) to enhance biodegradation of contaminants.
- j. Landfarm inspection and maintenance must be conducted on a weekly basis or immediately following a consequential rainstorm or windstorm events.
- k. Records of all material disposed of at the facility must be maintained by the discharge plan holder.
- l. The OCD offices in Santa Fe and Aztec must be notified when operation of the landfarm is discontinued for a period in excess of six (6) months or if there is a change in the configuration of the landfarm within the property covered by the discharge plan.

Please be advised this approval does not relieve Williams Field Services Company from liability should operations result in contamination to the environment. If you have any questions contact Mr. W. Jack Ford at (505) 476-3489.

Sincerely,



Roger C. Anderson,  
Environmental Bureau  
Oil Conservation Division

RCA/wjf

cc: OCD Aztec District Office

RECEIVED

OCT 02 2003

OIL CONSERVATION  
DIVISION



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

September 29, 2003

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

**Sent Via Fax: 505-476-3462**

RE: Request to Develop a Centralized Landfarm  
Thompson Compressor Station, San Juan County, NM  
Discharge Plan: GW-328

This correspondence is to request permission to locate a centralized the landfarm at the reference facility for a one-time cleanup effort. Williams are planning to remediate soil contamination at the following Williams Field Service facilities in the Thompson and Glade area north west of Farmington, New Mexico; Glade Straddle, Thompson, Hare, Horton Straddle, Richardson Straddle, and Lawson Straddle.

The remediation effort is to address historic and incidental hydrocarbon contamination around storage tanks which are being upgraded to included lining of secondary containments and other site activities. The exact volume of material from each site is not know but anticipated to be less than 25 cubic yards per site. The cleanup effort is schedule for this fall.

A centralized landfarm is planned for the Thompson Compressor site to accommodate the contaminated soils from all sites. This will allow more efficient management of the remediation and reduce the number of sites with landfarms. Refer to the attached site diagram for the approximately location of the landfarm. Landfarming will follow the procedures currently approved by NMOCD and the landfarm will only be used to manage contaminated soils generated during this one-time cleanup effort.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Lane".

Michael Lane  
Williams Energy Services  
Four Corners Area Environmental Specialist

Encl:

XC: Tony Deherrera, Team Lead  
Thompson Environmental File: 220





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

RECEIVED

DEC 07 2001

Environmental Bureau  
Oil Conservation Division

December 7, 2001

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

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

Dear Mr. Ford:

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

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

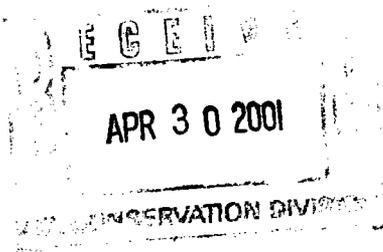
If you have any questions or require additional information, I can be reached at (505) 632-4634.

Sincerely;

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

Mark J. Bareta  
Senior Environmental Specialist

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



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

April 27, 2001

Water management Quality Management Fund  
C/O: Oil Conservation Division  
1220 North St. Francis Drive  
Santa Fe NM 87505

Dear Sir or Madam:

Enclosed please find, check number 1000278003 for \$13,300 to cover the fees for the following discharge plans:

Thompson Compressor Station - GW 328	1,700.00
• Lybrook Pump Station - GW 337	1,200.00
• Estancia Pump Station - GW 339	1,200.00
• Edgewood Pump Station - GW 340	1,200.00
• Keblah Compressor Station - GW 329	1,766.00
• Chaco Compressor Station - GW 331	1,700.00
• Blanco Compressor Station - GW 327	1,700.00
• Caprock Pump Station - GW 342	1,200.00
• Dogie Compressor Station - GW 330	1,700.00

Your assistance in processing this fee is greatly appreciated.

If you have any questions please contact me at 505/634/4956.

Thank you,

Clara M. Garcia  
Environmental Compliance

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
19APR01	20010419	0016442-FCA040107010	THOMPSON, DOGIE, BLANCO, CHACO/KEBLAHM EDG	13,300.00

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
	04/25/2001	71717	WATER MGMT & QUALITY MGMT FUND	\$13,300.00

0285967

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 4/25/01,  
or cash received on \_\_\_\_\_ in the amount of \$ 13,300.00

from Williams Field Services  
Thompson C.S. Gw-328 Lybrook P.S. Gw-337 Estancia P.S. Gw-339  
for Edgewood P.S. Gw-340 Kahlah C.S. Gw-329 Charol C.S. Gw-331 Blaney P.S. Gw-32  
(Facility Name) Caprock P.S. Gw-342 Dogie C.S. Gw-330 (CP No.)

Submitted by: [Signature] Date: 4/30/01

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 FIELD SERVICES COMPANY  
1806 South Baltimore Avenue \* P.O. Box 645 \* Tulsa, OK 74101-0645

70-2322 / 719  
A/C 9401076

DATE: 04/25/2001

PAY TO THE ORDER OF:

PAY → \*\*\*\*\*\$13,300.00

WATER MGMT & QUALITY MGMT FUND  
OIL CONSERVATION DIVISION  
1220 N SAINT FRANCIS DR

SANTA FE  
United States  
Bank One, NA  
Illinois

NM 87505

[Signature]

Authorized Signer

# AFFIDAVIT OF PUBLICATION

Ad No. 44165

STATE OF NEW MEXICO  
County of San Juan:

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

Wednesday, March 14, 2001.



And the cost of the publication is \$188.62.

ON 3/12/2001 ALETHIA ROTH LISBERGER appeared before me, whom I know personally to be the person who signed the above document.

  
My Commission Expires April 10, 2004

## COPY OF PUBLICATION

918

Legals

### NOTICE OF PUBLICATION

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

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

(GW-327) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan application for their Blanco compressor station located in the NW/4 SW/4, Section 32, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. All effluents generated on site are collected in containment vessels prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 100 to 150 feet with a total dissolved solids concentrations ranging from 200 to 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-328) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Thompson compressor station located in the SE/4 SE/4, Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 90 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-329) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Klebah compressor station located in the SW/4 SW/4, Section 12, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. All effluents generated on site are collected in containment vessels prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth ranging from 380 to 400 feet with a total dissolved solids concentrations ranging from 200 to 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-330) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Dogie compressor station located in the NW/4 NW/4, Section 4, Township 25 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top 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 15 to 20 feet with a total dissolved solids concentrations ranging from 2400 to 2500 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-331) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for

## NOTICE OF PUBLICATION

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(GW-331) - Williams Field Service, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Chaco compressor station located in the SE/4 SW/4, Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

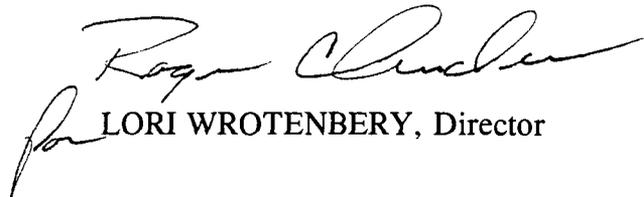
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday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

A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 23rd day of February, 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
LORI WROTENBERY, Director

SEAL

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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

New       Renewal       Modification

1. Type: Compressor (Thompson Compressor Station) *GW-328*

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, NM 87413

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

3. Location: SE /4 SE /4 Section 4 Township 30 North Range 12 West

Submit large scale topographic map showing exact location.

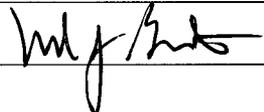
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description 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: Mark J. Baretta

Title: Senior Environmental Specialist

Signature: 

Date: 1/17/2001

**DISCHARGE PLAN**

**TORRE ALTA GATHERING SYSTEM  
THOMPSON COMPRESSOR STATION**

Williams Field Services Company

January 2001

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

## List of Appendices

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

**I. TYPE OF OPERATION**

The Thompson Compressor Station was built in 1971 to 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  
188 CR 4900  
Bloomfield, NM 87413  
(505) 632-4634

**Contact Person:**

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

**III. LOCATION OF FACILITY**

The Thompson Compressor Station is located in the Section 4, Township 30 North, Range 12 West, in San Juan County, New Mexico, approximately 7 miles northeast of Farmington, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangle: Flora Vista, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All Figures are attached following Section XI of the text.

**IV. LANDOWNER**

Williams Field Services is leasing the subject property from:

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

**V. FACILITY DESCRIPTION**

This facility is classified as a field compressor station and is unmanned. The air permit for this site allows the operation of two turbines: one 1125-hp Solar turbine, one 891-hp Solar turbine; and two reciprocating engines: one 958 hp White Superior, and either one 1027-hp Caterpillar or one 1864-hp Waukesha 9390 GL. In Addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

*4001 hp*

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

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

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

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

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1000-2000 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Wash-down Water	Compressor Skid	1000-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Natural Gas Condensate	Dehydrator, Scrubber, Gas Inlet Separator	2000-5000 bbl/year	No additives
Waste Water	Drawn of Natural Gas Condensate Tank, Dehydrator	2000-4000 bbl/year	No additives
Used Process Filters	Dehydrator, Inlet and Fuel Gas	75-100/year	No additives
Empty Drums / Containers	Liquid Containers	20-40/year	No additives
Spill Residue (i.e., gravel, soil)	Incidental spills	Incident dependent	Incident dependent
Used Absorbents	Incidental spill/leak equipment wipe-down	Incident dependent	No additives

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

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant.

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

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

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

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

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Drums or other containers	Varies	Mobile unit	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the facility. Recycling options may be considered when available.
Wash-down Water	Drum or other container	Varies	Mobile Unit	Non-exempt	Contractor may pump wash water back into truck after washing; water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Natural Gas Condensate	Above Ground Storage Tanks	100 bbl 500 bbl	Berm	Exempt	Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.
Waste Water	Below grade vaulted tanks	250 gal 70 bbl	Berm	Exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Drums may be returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed
Spill Residue (i.e., soil, gravel)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the facility. Recycling options may be considered when available.
Ambitrol	Above ground storage tank	800 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above ground storage tank	3000 gallons 2 @ 500 gallons	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol	Above ground storage tank	210 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol	Above ground storage tank	325 gallons 210 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

## VIII. STORM WATER PLAN

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

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

### Site Assessment and Facility Controls

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

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

### Best Management Practices

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

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

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

**IX. INSPECTION, MAINTENANCE AND REPORTING**

Ignacio Field 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.

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

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

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

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

**XI. SITE CHARACTERISTICS**

The Thompson Compressor Station is located approximately 7 miles northeast of Farmington, New Mexico. The site elevation is approximately 5800 feet above mean sea level. The natural ground surface topography slopes downward toward the southwest. The maximum relief over the site is approximately 5 feet.

Intermittent flow from the site will follow the Flora Vista Arroyo drainage towards the southeast. The Flora Vista Arroyo drains into the Animas River approximately 3.2 miles southeast of the site. The Animas River, at approximately 5480 feet in elevation, is the nearest down gradient perennial source of surface water to the site.

A review of the available hydrologic data<sup>1,2,3</sup> for this area revealed that there are four water wells within a one-mile radius of the Thompson Compressor Station. The nearest water well was located approximately 500 feet west of the site in the SW/4 SE/4 Section 4, Township 30 North, Range 12 West. It is registered as domestic well. No additional well data was available.

Another domestic water well was located approximately 550 feet north-northwest of the site in the SW/4 SE/4 Section 4, Township 30 North, Range 12 West. The limited data available on this well indicated that the well was drilled to a depth of 140 feet and depth to water was reported to be 88 feet. The other two wells were found more than 1/2 mile from the subject site.

The Nacimiento Formation is the water-bearing unit. This formation consists of a sequence of interbedded sandstone and mudstone. The total dissolved solids (TDS) concentration of wells in the area was not available.

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

<sup>1</sup>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.

<sup>2</sup>Records of Water Wells in San Juan County, 1978-1983.

<sup>3</sup>Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2000.

## **XII. FACILITY CLOSURE PLAN**

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

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

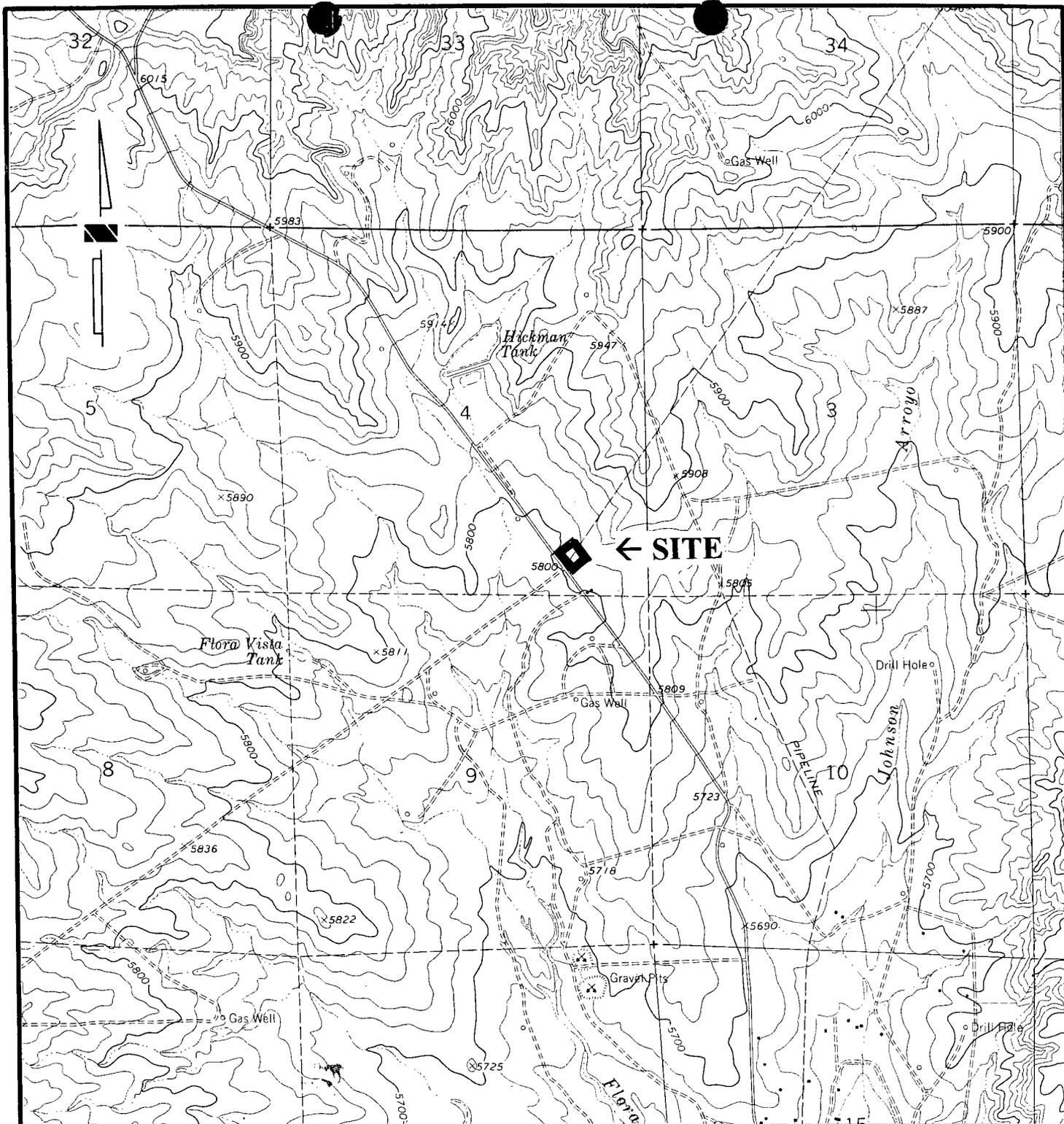
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

**FIGURE 1**

**SITE VICINITY / TOPOGRAPHIC MAP**

**FIGURE 2**

**SITE PLOT PLAN**



Source: USGS Flora Vista Quadrangle, New Mexico

Scale: 1" = 2,000'



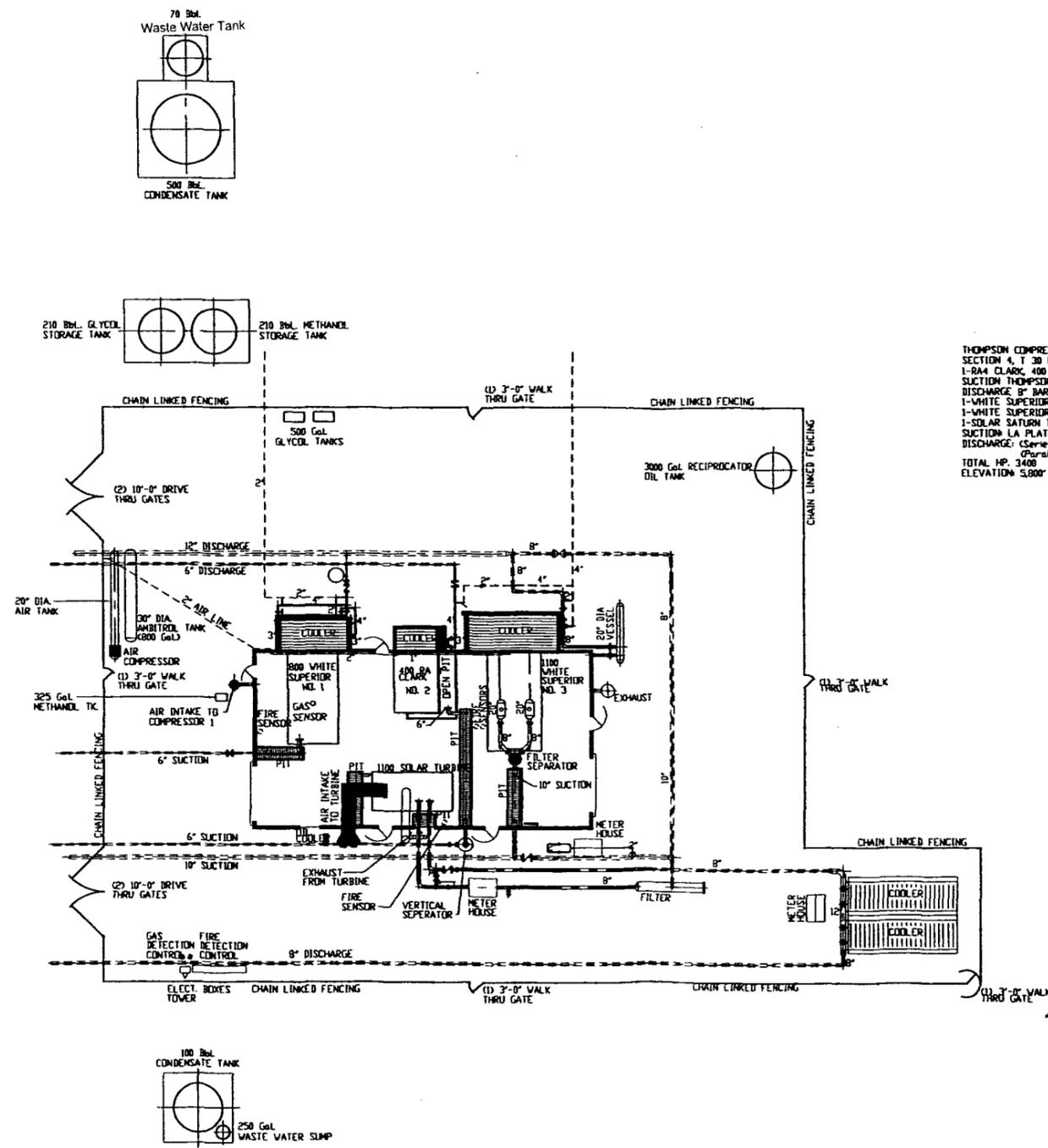
**Figure 1 Site Vicinity / Topographic Map**  
**Thompson Compressor Station**  
 Section 4, Township 30N Range 12W  
 San Juan County, New Mexico

Subject or Title:

**SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN**

**ATTACHMENT "A" PRODUCT AND WASTE STORAGE LOCATIONS**

OPERATIONS		
Manual	THOMPSON COMPRESSOR STATION	
Section	EMERGENCY SHUTDOWN SYSTEM	Tab 13 Document No. 4213.001
Effective Date	1-5-99	Issue No. 01 Page No. 5 of 8



THOMPSON COMPRESSOR  
 SECTION 4, T 30 N, R 12 W, SAN JUAN COUNTY  
 1-204 CLARK 400 HP  
 SUCTION THOMPSON FIELD  
 DISCHARGE 8" BARKER/KUTZ M/L  
 1-WHITE SUPERIOR 800 HP  
 1-WHITE SUPERIOR 1100 HP  
 1-SOLAR SATURN TURBINE 1100 HP  
 SUCTION LA PLATA AREA  
 DISCHARGE (Series) TO SUCTION OF TURBINE DISCH.  
 (Parallel) TO LA PLATA M/L  
 TOTAL HP: 3400  
 ELEVATION 5,800'

S:\WFS05\PM\_EI\TMP\Eod\00040101.dwg Mon Mar 08 08:56:56 1999

REFERENCE DRAWINGS										REFERENCE DRAWINGS										REVISIONS										DRAFTING BY DATE PHM 1-5-99 CHECKED BY APPROVED BY ENGINEER BY DATE DESIGNED BY PROJ. APPROVED			STATE: NEW MEXICO COUNTY: SAN JUAN		WILLIAMS GAS PROCESSING - BLANCO ONE OF THE WILLIAMS COMPANIES		THOMPSON COMPRESSOR STATION SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN PLOT PLAN				SCALE: 1" = 1/16" W.D. NO. 98408		DWG NO. <b>TMP-1-P4</b>		SHEET 5 OF 8 REV 01	
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**APPENDIX A**

**SPILL CONTROL PROCEDURES**

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

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

## ▶ Document History (ISO9001)

## ▼ Document Body

### 1.0 PURPOSE AND SCOPE

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

### 2.0 CONTENTS

### 3.0 POLICY

#### 3.1 GENERAL

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

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

- a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
  - b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act
  - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
  - d. Section 112 of the Clean Air Act
  - e. Section 7 of the Toxic Substance Control Act
- 3.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- 3.1.5 Facilities which could discharge or spill, oil or hazardous substances into a watercourse must comply with the applicable federal, state or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake or standing body of water capable of collecting or transporting an oil or hazardous substance.
- 3.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
- a. Non-Transportation Related Facilities
    - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
    - (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
  - b. Transportation Related Facilities
    - (1) All vehicles, pipeline facilities, loading/unloading facilities and other mobile facilities which transport oil or hazardous substances.
- 3.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all oil and hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.
- 3.1.8 The facility superintendent is responsible for spill prevention. His/her duties include,

but are not limited to, the following:

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

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

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

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

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

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

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

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

## **3.2 BULK STORAGE TANKS**

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

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

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

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

### **3.3 FACILITY DRAINAGE**

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

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

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

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

a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation or displacement by foreign materials.

b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.

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

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

3.3.5

a. Berms or retaining walls

b. Curbing

c. Culverting, gutters or other drainage systems

d. Weirs, booms or other barriers

e. Spill diversion ponds or retention ponds

f. Sorbent materials

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

3.4.1 Aboveground valves and pipelines should be examined regularly by operating

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

### **3.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK**

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

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

## **4.0 PROCEDURE**

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

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

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

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

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

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

- Ammonia
- Antifreeze
- Amine

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

### III. Releases of Certain Other Materials Reportable:

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

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

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

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

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

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

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

#### **Gas Control Personnel**

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

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

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

#### **Facility Superintendent**

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

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

#### **Environmental Affairs**

- 4.1.8 Assesses reporting requirements to state and federal agencies (contacts Legal Department and Right-of-Way Department, if appropriate). (See Emergency Operating Procedure Manuals).
- 4.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.
- 4.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

#### **4.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL Facility Superintendent or Designee**

- 4.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:
- a. Time and date of discharge or spill
  - b. Facility name and location
  - c. Type of material spilled
  - d. Quantity of material spilled

- e. Area affected
- f. Cause of spill
- g. Special circumstances
- h. Corrective measures taken
- i. Description of repairs made
- j. Preventative measures taken to prevent recurrence.

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

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

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

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

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

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

C. Bulk Storage Tanks or any other Facilities

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

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

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**APPENDIX B**

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

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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Form C-141  
Revised March 17, 1999

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

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

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

**LOCATION OF RELEASE**

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

**NATURE OF RELEASE**

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	
If a Watercourse was Impacted, Describe Fully.*		
Describe Cause of Problem and Remedial Action Taken.*		
Describe Area Affected and Cleanup Action Taken.*		
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.		
Signature:	<u>OIL CONSERVATION DIVISION</u>	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
Date:	Phone:	Conditions of Approval:
		Attached <input type="checkbox"/>

\* Attach Additional Sheets If Necessary

Title: NM - Environment Department • Environmental Improvement Board • Water Quality Control Commission • Groundwater Protection and Remediation Bureau • WQCC 82-1 • Part I • 1-200 • 1-203

Section: 1-203 Notification of Discharge — Removal  
Date: November 18, 1993  
Subject  
Terms:

1-203. Notification of Discharge -- Removal.

A. With respect to any discharge from any facility of oil or 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;

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, Ground Water Bureau, Environmental Improvement Division, 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 discharge; and
- g. any actions taken to mitigate immediate from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

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 division 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.

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below 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.

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.

6. If it is possible to do so without unduly delaying needed corrective action, the facility owner/operator shall endeavor to contact and consult with the Chief, Ground Water Bureau, Environmental Improvement Division or appropriate counterpart in a delegated agency, in an effort to determine the division'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.

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the division. In the event that the report is not satisfactory to the division, 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 division.

8. In the event that the modified corrective action report also is unsatisfactory to the division, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the division director. The division director 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 director concerning the shortcomings of the modified corrective action report, the division may take whatever enforcement or legal action it deems necessary or appropriate.

B. Exempt from the requirements of this section are continuous or periodic discharges which are made:

1. in conformance with water quality control commission regulations and rules, regulations or orders of other state or federal agencies; or

2. in violation of water quality control commission regulations but pursuant to an assurance of discontinuance or schedule of compliance approved by the Commission or one of its duly authorized constituent agencies.

C. As used in this section:

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. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;

**Title:** NM - Environment Department · Environmental Improvement Board · Water Quality Control Commission · Groundwater Protection and Remediation Bureau · WQCC 82-1 · Part I · 1-200 · 1-203

**Section:** 1-203 Notification of Discharge — Removal

**Date:** November 18, 1993

**Subject**

**Terms:**

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes.

4. "operator" means the person or persons responsible for the overall operation of a facility; and

5. "owner" means the person or persons who own a facility, or part of a facility.

D. Notification of discharge received pursuant to this regulation 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.



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

NOV 13 2000

November 9, 2000

Oil Conservation Division  
Attn: Jack Ford  
2040 S Pacheco  
Santa Fe NM 87505

Dear Mr. Ford,

Per our conversation on November 8, 2000 we agreed that you would receive a letter from me regarding the status of the following Williams Field Services Compressor Station Discharge Plans: Blanco, Chaco, Dogie, Hare, Keblah, and Thompson. A Williams' consultant is currently working on these plans and the projected completion date is the end of November.

If you have any questions or need further information, please feel free to contact me at 505/634/4956.

Sincerely,

Clara M Garcia  
Environmental Compliance



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

February 18, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-559-573-346**

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

**RE: DISCHARGE PLAN REQUIREMENT**  
**Williams Field Services, Inc.**  
**Thompson Compressor Station**  
**San Juan County, New Mexico**

Dear Ms. Deklau:

Under the provisions of the New Mexico Water Quality Control Commission (WQCC) Regulations, Williams Field Services, Inc. is hereby notified that the filing of a discharge plan is required for the Williams Field Services, Inc. (former PNM) Thompson Compressor Station facility located in Section 4, Township 30 North, Range 12 West, NMPM, San Juan County, New Mexico:

This notification of discharge plan requirement is pursuant to Part 3104 and Part 3106 of the WQCC Regulations. The discharge plan, defined in Part 1101.N. of the WQCC Regulations, should cover all discharges of effluent or leachate at the facility or adjacent to the facility site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in below grade sumps, buried underground process tanks and/or piping), and closure plans for any pits or ponds whose use will be discontinued.

Enclosed is an application form for the above named facility. Two copies of your discharge plan application should be submitted to the OCD Santa Fe Office and one copy to the Aztec District Office for review purposes.

Ms. Ingrid Deklau  
February 18, 2000  
Page 2

Section 3106 of the regulations requires a submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Part 3106 also allows the discharge to continue without an approved discharge plan until 240 days after written notification by the Director of the OCD that a discharge plan is required. An extension of this time may be sought and approved for good cause.

Pursuant to the New Mexico Water Quality Control Commission (WQCC) Regulation 3114 "every billable facility submitting a discharge plan for approval, modification or renewal shall pay the fees specified in this section to the Water Quality Management Fund". WQCC Rule 3114 became effective as of August 18, 1991, and is found on page 38 of the WQCC Rules and Regulations.

Every billable facility submitting a new discharge plan will be assessed a fee equal to the filing fee plus either a flat fee or discharge fee. The filing fee is fifty (\$50) dollars and shall be submitted with the discharge plan application (nonrefundable). The remainder of the "total fee" for natural gas compressor stations falls under the "flat fee" category and varies according to the horsepower rating at the facility. Please submit all checks to the OCD Santa Fe office and payable to the **NMED - Water Quality Management**.

If there are any questions on this matter, please feel free to contact Mr. W. Jack Ford at (505) 827-7156 as he is assigned responsibility for review of service facility discharge plans.

Sincerely,



Roger C. Anderson  
Oil Conservation Division

xc: OCD Aztec District Office

Z 559 573 346 *OCD FORD*

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Postmark or Date	<i>Thompson</i>

PS Form 3800 April 1995