

GW – 149

**GENERAL
CORRESPONDENCE**

YEAR(S): 2008 - 2012

Lowe, Leonard, EMNRD

From: Bays, David [David.Bays@Williams.com]
Sent: Thursday, September 04, 2008 8:06 AM
To: Lowe, Leonard, EMNRD
Cc: Irwin, Jay B; Savage, Ryan; Lucero, Isaac; Jackson, Steve; Wicburg, Don; DeHerrera, Anthony; Huerta, Lupe; Johnson, John T.; Jones, Larry; McAndrews, Mark; Pruitt, Joseph; Rothlisberger, Vern; Ruggles, Dale; Smith, Russell; Specht, Randy; Sullivan, Danny; Trosky, Pete
Subject: RE: Explanation, GW-149
Attachments: Exterran Fluid Transfer Procedure.xls

Mr. Lowe;

During the afternoon of July 29, the contract operator opened a valve to fill the #11 compressor engine lubricating oil day tank from bulk storage. The operator had previously opened the day tank fill valve on #5 compressor engine. The valve on number 5 was left open and the day tank overfilled before the operator returned to unit #5. Approximately 12 to 15 gallons of unused lubricating oil sprayed out of the ½ inch vent line on top of the day tank. The oil was dispersed as a spray over the area we saw on the morning July 30. The site has been fully remediated. Since the oil is not an exempt waste, the soil removed is currently stock piled waste characterization awaiting results from an outside laboratory. Once the characterization results establish the spill is not hazardous as defined by RCRA Subtitle C, the soil will be transported to a commercial landfarm for disposal.

The contract operating company will be reviewing their Fluid Transfer procedures during their September safety meeting, and conducting training to ensure field employees are following the procedure properly. Particular emphasis will be placed on observing valve positions while filling small tanks. Closer attention to the prescribed methods in their procedure should prevent such releases in the future. I have appended a copy of the contractor's procedure for your reference.

David Bays, REM
 Phone: (505) 634-4951
 Fax: (505) 632-4781

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Monday, August 11, 2008 11:23 AM
To: Bays, David
Subject: Explanation, GW-149

David,

During the inspection of GW-149, El Cedro C.S. and treating station we observed the following.

What happened here? I want to make sure I understood what the cause of this release was.

Leonard Lowe
 Environmental Engineer
 Oil Conservation Division/EMNRD
 1220 S. St. Francis Drive

10/2/2008

Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>

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Operating Procedure

Fluid Transferring

1.0 Objective

The purpose of this procedure is to ensure the proper environmental guidelines are followed while transferring fluids of any type. The focus of this procedure revolves around prevention of spills and leaks.

2.0 Scope

This procedure applies to all Exterran Southern Rockies Basin Facilities, Employees, and/or Contract Employees. Customer procedures will be followed when more stringent than Exterran's.

3.0 References (see "EMS Compliance Matrix" for further references)

40 CFR 112

19.15.1.13 NMOCD

4.0 Responsibility

All Exterran Service Managers are responsible for ensuring their employees are properly trained in the fluid transferring procedures, and that the employees comply with the procedure required.

Each Exterran Employee and/or Contract Employee is responsible to follow the requirements of this Operating Procedure and/or applicable customer procedure.

Each Exterran Employee and/or Contract Employee is responsible to ensure all necessary equipment needed to properly perform fluid transfer procedure is available for use within operation area.

The Exterran Southern Rockies Basin Management and Local HSE Department are responsible to make revisions as necessary to this operating procedure. At a minimum, this and all other operating procedures will be reviewed for applicability on an annual basis.

5.0 Definitions

Grounded - To connect with the ground so as to make the Earth part of a circuit.

Integrated Systems - Systems which can be affected by transfer process. This can include multiple storage tanks which must be isolated to transfer fluids and prevent overfilling and/or transfer of wrong product.

Static Charge - Produced stationary charge of electricity formed by rubbing unlike bodies together.

6.0 Procedures

Proper fluid transfer pump must be used for transferring fluids in enclosed piping systems and flexible hose systems. Siphoning of fluids by mouth or non-approved pump is not allowed.

All connections on piping and/or hoses must be in good condition with proper seal or gasket installed. Securing devices used to lock the connections together must be replaced before use if damaged.

Transfer pump must not have fluid leaks and must be contained in appropriate drip pan while operating in the event a leak occurs.

Placement of all valves associated with fluid transfer must be verified before transfer begins. Other integrated systems associated with fluid transfer process must also be verified as to their status.

Flexible hose ends must be secured into both containers before transfer begins. The securing devices must be inspected during the transfer process to verify their capability.

The fluid transfer process must be constantly monitored by applicable Exterran personnel to prevent any spills or leaks from occurring.

The container receiving the fluid must have appropriate labels attached. (see "Container Labeling" procedure)

Valves on piping or hoses must be inspected after completion of transfer process to ensure they are in proper operating position. All end caps must be installed on piping and hoses to prevent leaks. (see "Prevention and Repair of Leaks on Fittings, Pipes, and Hose Connections" Procedure)

To prevent static charge during transferring procedures, bonding cables must be used during transfer of flammable products. The containers and transfer equipment must be properly grounded to ensure this process is functional.

AFFIDAVIT OF PUBLICATION

Ad No. 584009

STATE OF NEW MEXICO
County of San Juan:

CONNIE PRUITT, being duly sworn says:

That she is the ADVERTISING DIRECTOR of

THE DAILY TIMES, a daily newspaper general circulation published in English Farmington, said county and state, and the hereto attached Legal Notice published in a regular and entire issue of said DAILY TIMES, a daily newspaper qualified for the purpose within the meaning Chapter 167 of the 1937 Session Laws of State of New Mexico for publication appeared in The Daily Times on the following June 13, 2008

And the cost of the publication is \$ 446.

[Signature of Connie Pruitt]

ON 6/16/08 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

[Signature of Christine Sellers] My Commission Expires 11/05/11

COPY OF PUBLICATION

ATENCIÓN PÚBLICA

Williams Four Corners, LLC, County Road 4900, Bloomfield, NM 87413, presentaron una aplicación de renovación en el mayo de 2008 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division, para la descarga antes aprobada planean GW-149 para su El Cedro Natural Gas Treating Plant and Compressor Station localizada en el NE/4, NW/4 de la Sección 31, Municipio 29 Norte, Rectoría 5 Oeste en Rio Arriba County, New Mexico. La instalación, este de aproximadamente 24 millas localizado de Blanco, proporciona servicios de acondicionamiento y compresión de gas naturales.

El plan de descarga se dirige como las caídas, los agujeros, y otras descargas casuales a la superficie serán manejados. Los materiales típicos generados o usados en la instalación incluyen el echar agua condensado/producción de gas natural, el petróleo de lubricación nuevo y usado, echar agua de desecho ácido del equipo se lavan abajo, y glicol. La cantidad de wastewater generado es 100 - 50000 galones por año por ríotor. La instalación no descarga para revesistiro subvestir los echares agua, y por lo tanto la cantidad y la calidad de las descargas no son aplicables. Toda la basura generada será temporalmente almacenada en tanques o contenedores equipados con la contención secundaria. La basura transportada offsite será dispuesto o reciclado en una instalación permitida por la agencia estatal, federal, o tribal recibir tal basura. Se espera que la profundidad de agua subterránea estimada en el sitio esté en la variedad de 50-300 pies. El total se disolvió se espera que la concentración de sólidos del agua subterránea de área esté en la variedad de 200-2,000 partes por millón.

Cualquier persona interesada o personas pueden obtener la información, presentar comentarios o solicitar para ser colocado en una lista de direcciones específica de instalación para futuros avisos por ponerse en contacto con Leonard Lowe en el Nuevo México OCD en 1220 Sur San Francis Drive, Santa Fe, Nuevo México 87505. Teléfono: (505) 476-3492. El OCD aceptará comentarios y declaraciones del interés en cuanto a la renovación y creará una lista de direcciones específica de instalación para personas que desean recibir futuros avisos.

PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in May 2008 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-149 for their El Cedro Natural Gas Treating Plant and Compressor Station located in the NE/4, NW/4 of Section 31, Township 29 North, Range 5 West in Rio Arriba County, New Mexico. The facility, located approximately 24 miles east of Blanco, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100-50000 gallons per year per engine. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped off-site will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be in the range of 50-300 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Telephone: (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

THE DAILY TIMES FARMINGTON, NEW MEXICO
 THE FOUR CORNERS INFORMATION LEADER

PO Box 450 Farmington, NM 87499

Date: 06/26/08

OIL CONSERVATION DIVISION

OIL CONSERVATION DIVISIO
 1220 SOUTH ST. FRANCIS DRIVE
 SANTA FE, NM 87505
 (505) 476-3440

Ad#	Publication	Class	Start	Stop	Times	AS/400 Acct
1001016754	FARMINGTO	0152 - Legal Notices	06/25/2008	06/25/2008	1	781442
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Total Cost:						\$221.86
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Please include Ad number on your payment.

AFFIDAVIT OF PUBLICATION

Ad No. 60354

STATE OF NEW MEXICO County of San Juan:

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

Wednesday June 25, 2008

And the cost of the publication is \$221.86

ON 6/26/08 BOB WALLER appeared before me, whom I know personally to be the person who signed the above document.

Christine Sellers
My Commission Expires - 11/05/11

COPY OF PUBLICATION

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-149) Williams Four Corners., Mr. David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their El Cedro Gas plant and compressor station, located in the NE/4 NW/4 of Section 31, Township 29 North, Range 5 West, NMPM, Rio Arriba County, approximately 24 miles east of Blanco, New Mexico. The function of the facility is to remove CO2 from a portion of the incoming natural gas using an amine treating system, to dehydrate portions of the incoming natural gas, and to compress the treated natural gas for pipeline transmission using compressors. Approximately 100-5000 gal/year/unit of waste/wash down water; 1000-4000 bbl/year of used glycol; 500-2000 gal/year/engine of used oil and 200 gal/year of lab waste are generated and stored in onsite within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 20-300 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/l. The discharge plan 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.

(GW-352) Williams Four Corners., Mr. David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their Cabresto compressor station, located in the NE/4 NE/4 of Section 19, Township 30 North, Range 4 West, NMPM, Rio Arriba County, approximately 39 miles east of Bloomfield, New Mexico. The facility provides metering and compression services to various producers for the gathering of natural gas for treatment and delivery. Approximately 100-5000 gal/year/unit of waste/wash down water; 1000-4000 bbl/year of used glycol and 500-2000 gal/year/engine of used oil are generated and stored in on site within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 100-400 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sírvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energía, Minería y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

THE SANTA FE
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NM EMNRD OIL CONSERV
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00259411 ACCOUNT: 00002212
LEGAL NO: 85560 P.O. #: 52100-00000075
328 LINES 1 TIME(S) 286.16
AFFIDAVIT: 7.00
TAX: 23.27
TOTAL: 316.43

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS
AND NATURAL RE-
SOURCE DEPART-
MENT
OIL CONSERVATION
DIVISION

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

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I, L. Paquin, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 85560 a copy of which is hereto attached was published in said newspaper 1 day(s) between 06/26/2008 and 06/26/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 26th day of June, 2008 and that the undersigned has personal knowledge of the matter and things forth in this affidavit.

(GW-283) Southern Union Gas L.P., 301 Commerce Street, Suite 700, Fort Worth TX, 76102, has submitted an application for their previously approved discharge plan for their Jal south compressor station, located in the letter F of Section 33, Township 25 South, Range 37 East, NMPM, Lea County, New Mexico. The facility compresses field gas, removes excess liquids, measures gas volume and transports the gas to pipelines. Approximately 100 - 200 gal/month of used oil, 75 - 100 gal/month of wash/storm water, and 50 -100 bbls/month of gas liquids from scrubbers will be stored onsite in sufficiently bermed containers. Product and waste streams are to be properly designated and identified. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth

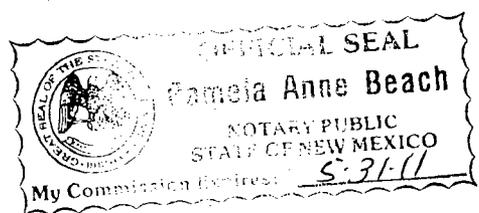
SI/ L. Paquin
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 26th day of June, 2008

Notary Paula Anne Beach

Commission Expires: May 31, 2011

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of approximately 100 feet, with a total dissolved solids concentration of approximately 775 mg/l. The discharge plan 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.

(GW-149) Williams Four Corners, Mr. David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their El Cedro Gas plant and compressor station, located in the NE/4 NW/4 of Section 31, Township 29 North, Range 5 West, NMPM, Rio Arriba County, approximately 24 miles east of Blanco, New Mexico. The function of the facility is to remove CO2 from a portion of the incoming natural gas using an amine treating system, to dehydrate portions of the incoming natural gas, and to compress the treated natural gas for pipeline transmission using compressors. Approximately 100-5000

gal/year/unit of waste/wash down water; 1000-4000 bbl/year of used glycol; 500-2000 gal/year/engine of used oil and 200 gal/year of lab waste are generated and stored in onsite within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 20-300 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/l. The discharge plan 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.

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the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

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Para obtener más información sobre esta solicitud en español, sírvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerales y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservación Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New Mexico (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 20th day of June 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
S E A L
Mark Fesmire,
Director
Legal No. 85560
Pub. June 26, 2008

David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their El Cedro Gas plant and compressor station, located in the NE/4 NW/4 of Section 31, Township 29 North, Range 5 West, NMPM, Rio Arriba County, approximately 24 miles east of Blanco, New Mexico. The function of the facility is to remove CO2 from a portion of the incoming natural gas using an amine treating system, to dehydrate portions of the incoming natural gas, and to compress the treated natural gas for pipeline transmission using compressors. Approximately 100-5000 gal/year/unit of waste/wash down water; 1000-4000 bbl/year of used glycol; 500-2000 gal/year/engine of used oil and 200 gal/year of lab waste are generated and stored onsite within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 20-300 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/l. The discharge plan 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.

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based on information in the permit application and information submitted at the hearing.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 20th day of June 2008.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
S E A L
Mark Fesmire,
Director
Legal No. 85560
Pub. June 26, 2008