

GW - 047

INSPECTION

Per Permit Condition: Permit signed March 13, 2009.

16. OCD Inspections: The OCD performed an inspected this facility on November 19, 2008. David Bays and Brandon Powell were in attendance. All photographs referenced below are located in the attachment of this permit. Based on the inspection OCD determined the following:

Photo 2: Williams Four Corners shall retrofit their five ponds with a double liner with a leak detection system in accordance with Permit Condition 11.B.

Photo 8 & 9: During the inspection it appeared that was a discharge to the ground in this area. Williams shall ensure that all discharges are addressed in a proper and timely manner.

Photo 11: Williams shall ensure that these barrels properly contain its fluids and have proper secondary containment in accordance with Permit Condition 7.

Photo 12 & 13: These and all ASTs must be surrounded by appropriate lined secondary containment. See permit condition 9.

Photo 14 & 15: The secondary containment area must be kept clean of unnecessary debris and soil. Williams shall clean out the containment area.

Photo 17: Williams shall place this tank properly placed on an impermeable location within a secondary containment area.

Photo 18: Reminder the staging area for contaminated soil must be addressed within 180 days as it is considered waste (see Condition 6. B). Williams shall keep cells clean of any other debris, weeds, trash, etc.

The Lybrook Gas Plant appeared to be in good condition. **Williams Four Corners shall submit to the OCD Environmental Bureau a plan to retrofit the 5 ponds by April 17, 2009.** All other issues should be addressed in accordance with the permit conditions. Williams shall ensure that the Lybrook Gas Plant employees are aware of the discharge plant permit and its location onsite.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Monday, April 27, 2009 1:06 PM
To: 'Bays, David'
Cc: Chivers, Charlotte ; Pruitt, Joseph; Sandoval, Monica
Subject: RE: Lybrook Pond Retrofit Plan

Mr. Bays,

Thank you for the information. Please keep the OCD informed on your proposed plan for the ponds.

The OCD recognizes that the two southern ponds are for storm water only and are not required for lining.

If you have any questions please feel free to contact me.

Thank you,

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
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/oecd/>

From: Bays, David [<mailto:David.Bays@Williams.com>]
Sent: Thursday, April 16, 2009 11:07 AM
To: Lowe, Leonard, EMNRD
Cc: Chivers, Charlotte ; Pruitt, Joseph; Sandoval, Monica
Subject: Lybrook Pond Retrofit Plan

Leonard – as required by the new Discharge Permit number GW-047, please find attached Williams' plan to install polymer liners in the three industrial waste water ponds at the Lybrook Gas Plant.

David Bays, REM
Sr. Environmental Specialist
Williams Midstream
Phone: (505) 634-4951
Fax: (505) 632-4781

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

April 16, 2009

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

RE: Williams Four Corners, LLC - Lybrook Gas Plant, Discharge Plan Number GW-047

Dear Mr. Lowe:

On March 10, 2009 the Oil Conservation Division ("OCD") issued the Approval Conditions for the Lybrook Gas Plant Discharge Plan number GW-047. Condition 16 requires that by April 17, 2009 Williams Four Corners, LLC ("WFC") submit a plan to retrofit the Lybrook waste water impoundments with synthetic liners and leak detection. The Approval Conditions refer to "5 ponds." A copy of the WFC work plan is attached under **Tab A**.

Please be advised that the two southern-most ponds at Lybrook are storm water retention ponds. Those two ponds are operated under the U. S. EPA National Pollution Discharge Elimination System ("NPDES") Multi-Sector General Storm Water Permit ("MSGP"). As required by the MSGP, Lybrook developed a Storm Water Pollution Prevention Plan ("SWPPP"), submitted a Notice of Intent ("NOI"), on January 21, 2001 and was issued permit number NMR05A882. In December 2008 the EPA issued a new MSGP. WFC then revised the SWPPP to conform to the new MSGP requirements and submitted an update NOI in January 2009. Copies of the updated NOI and the new EPA permit number NMR05GC92, granting coverage under the MSGP, are attached under **Tab B**.

Since the State of New Mexico has neither applied for delegation nor been granted the authority to issue permits under the federal NPDES storm water management program, WFC will continue to operate the two storm water ponds as currently installed, and in compliance with the federal MSGP. The enclosed work plan will be implemented to retrofit the three industrial waste water ponds at Lybrook.

Sincerely yours,

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

David Bays, REM
Sr. Environmental Specialist

Tab A

Williams Four Corners, LLC
Lybrook Gas Plant
Pond Retrofit Work Plan

August – September 2009

Budget for non-discretionary funding to cover the cost of soil structure, hydrogeological study and pond liner engineering design.

March – April 2010

Prepare Request For Proposal (“RFP”) to include required testing of soil density and groundwater data.

Prepare RFP for design of the pond liner system. The liner system will include a primary polymer liner, a leak detection system. And a secondary polymer liner. The design is also to include standards for proper sloping of the underlying soil and proper installation of the liner fabric to extend beyond the pond containment berm. The RFP will include a requirement to prepare cost estimates for the installation of the upgraded ponds and containment.

April – June 2010

Based on review of the RFPs, select the contractor(s) who conduct the required field work and engineering design.

June – August 2010

Complete the design work and submit to NMOCD for review.

August – September 2010

Based on engineering estimates prepared by the contractor(s), budget for non-discretionary fund to cover the cost of any required site preparation and purchase and installation of the liner system.

January – February 2011

Prepare RFP, collect quotes and select contractor to install the liner systems.

Contractor will prepare a project work schedule. WFC will notify NMOCD of the proposed schedule to allow for on-site inspections is required.

March - September 2011

Install temporary tankage to handle process waste water during the pond construction phase.

Drain the ponds, with effluent transported to a commercial disposal well.

Sample any sludge and solids in the bottom of the ponds and arrange for appropriate off site disposal based on the analytical results.

Complete surface preparation, including any necessary compaction and sloping of the soil.

Install welded seam secondary liner and pressure test the seams.

Install filter fabric and a leak collection/detection system.

Install welded seam primary liner and pressure test the seams.

Submit final As-Built drawings to NMOCD and place the ponds in service.

After the ponds are placed in service, Lybrook personnel will check the leak detection systems weekly for six weeks. If any leakage is identified the installation contractor will be recalled to the site to make required repairs under the liner system warranty. If no leakage is found during the first six weeks of operation, the plant will begin to schedule and document monthly inspections as required by Approval Condition, Paragraph 11.

Tab B

NOTICE OF INTENT (NOI) FOR STORMWATER DISCHARGES ASSOCIATED WITH:
INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT

Submission of this completed Notice of Intent (NOI) constitutes notice that the operator identified in Section B of this form requests authorization to discharge pollutants to waters of the United States from the facility or site identified in Section C under EPA's NPDES Stormwater Multi-Sector General Permit (MSGP) for industrial stormwater. Submission of this NOI constitutes your notice to EPA that the facility identified in Section C of this form meets the eligibility conditions of Part 1.1 of the MSGP. Please read and make sure you comply with all eligibility requirements, including the requirement to prepare a stormwater pollution prevention plan. Refer to the instructions at the end of this form to complete your NOI.

A. Permit Number: **NM R 050000** (see Appendix C of the MSGP for the list of eligible permit numbers) Tracking Number (EPA Use Only): **NMR05GC92**

B. Facility Operator Information

1. Name: **WILLIAMS FOUR CORNERS, LLC**

2. IRS Employer Identification Number (EIN): -

3. Mailing Address:

a. Street: **192 CR 4900**

b. City: **BLOOMFIELD** c. State: **NM** d. Zip Code: **87413**

e. Phone: **505-634-4951** f. Fax (optional): **505-632-4781** g. E-mail: **DAVID.BAYS@WILLIAMS.COM**

C. Facility Information

1. Facility Name: **LYBROOK GAS CONDITIONING PLANT**

2. Have stormwater discharges from your site been covered previously under an NPDES permit? ☒ YES ☐ NO

a. If yes, provide the Tracking Number if you had coverage under EPA's MSGP 2000 or the NPDES permit number if you had coverage under an EPA individual permit: **NMR05A882**

b.1 If no, was your facility in operation and discharging stormwater prior to October 30, 2005? ☐ YES ☐ NO

b.2 If no to C.2.b.1, did your facility commence discharging after October 30, 2005 and before January 5, 2009? ☐ YES ☐ NO

3. Location Address:

a. Street: **HCR 17 BOX 360 HIGHWAY 550 MP 1**

b. City: **CUBA**

c. County or similar government subdivision: **RIO ARRIBA** d. State: **NM** e. Zip Code: **87013**

f. Latitude (use any one of the three formats provided): 1. ° ' " N (degrees, minutes, seconds) 2. ° ' " N (degrees, minutes, decimal) 3. **36.2314**° N (degrees decimal)

g. Longitude (use any of these 3 formats): 1. ° ' " W (degrees, minutes, seconds) 2. ° ' " W (degrees, minutes, decimal) 3. **107.5465**° W (degrees decimal)

h. Lat/Long Data Source: ☒ USGS topographic map ☐ EPA web site ☐ GPS ☐ Other:

If you used a USGS topographic map, what was the scale? **7.5 MINUTE**

4. Estimated area of industrial activity at your site exposed to stormwater: **30.7** (acres)

5. Is this a federal facility? ☐ YES ☒ NO

6. Is your facility located on Indian Country lands? ☐ YES ☒ NO

If yes, name of reservation, or if not part of a reservation, put "Not Applicable":

[illegible]

1a. SWPPP Contact Name: James Bays

2. URL of SWPPP (if applicable): _____

1. Using the instructions in Appendix E of the MSGP, under which criterion listed in Part 1.1.4.5 are you eligible for coverage under this permit?

2. If you select criterion E from Part 1.1.4.5:

a. What federally-listed species or federally-designated critical habitat are in your "action area?"

b. List the pollutants expected to be present in your discharge _____

c. If you are an existing discharger, do you have effluent monitoring data from EPA's MSGP 2000, or another previous NPDES permit? ☐ YES ☐ NO

c.1 If no, why not? ☐ No monitoring required for my sector ☐ Inactive/unstaffed site ☐ Other _____

c.2 Do you have any other data characterizing pollutants in your stormwater (describe)?

c.3 If you have benchmark monitoring data, did you exceed any of the applicable benchmarks? ☐ YES ☐ NO

c.4 Did you exceed any applicable effluent limitation guideline or cause or contribute to an exceedance of a State or Tribal water quality standard? ☐ YES ☐ NO

c.5 If you answered "yes" to either question F.2.c.3 or F.2.c.4 above, for what pollutant(s)? _____

d. Attach documentation supporting criterion E eligibility. Documentation should address species and habitat listed in F.2.a and the potential effects of pollutants listed in F.2.b (including any monitoring data for these pollutants) on the listed species and habitat.

[illegible]

Using the instructions in Appendix F of the MSGP, under which criterion listed in Part 1.1.4.6 are you eligible for coverage under this permit?

H. Certifier Name and Title

I certify under penalty of law that I meet the eligibility conditions of this permit and that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Title

Signature: JAMES BAYS

Date: 010709

F-mail: DAVID.BAYS@WILLIAMS.COM

NOI Preparer (Complete if NOI was prepared by someone other than the certifier)

Prepared by: _____

Organization: _____

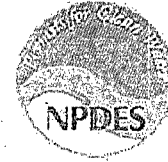
Phone: _____ Ext. _____ E-mail: _____

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U.S. ENVIRONMENTAL PROTECTION
AGENCY (EPA)
NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
EPA's NOI PROCESSING CENTER



01/07/2009

Company: WILLIAMS FOUR CORNERS, LLC
ATTN: JAMES BAYS
192 CR 4900
Bloomfield, NM 87413

Facility: LYBROOK GAS
CONDITIONING PLANT
HCR 17 Box 360 Highway 550 MP
103
Cuba, NM 87013

Permit Number: NMR05GC92.

This email/letter acknowledges that you have submitted a complete Notice of Intent form to be covered under the NPDES General Permit for Stormwater Discharges for Multi-Sector General Permit Activity (Multi-Sector General Permit). Coverage under this permit begins at the conclusion of your thirty-day waiting period, on 02/06/2009.

As stated above, this letter acknowledges receipt of a complete Notice of Intent. However, it is not an EPA determination of the validity of the information you provided. Your eligibility for coverage under the Permit is based on the validity of the certification you provided. Your signature on the Notice of Intent certifies that you have read, understood, and are implementing all of the applicable requirements. An important aspect of this certification requires that you correctly determine whether you are eligible for coverage under this permit.

As you know, the Multi-Sector General Permit requires you to have developed and begun implementing a Stormwater Pollution Prevention Plan (SWPPP) and outlines important inspection and record keeping requirements. You must also comply with any additional location-specific requirements applicable to your state or tribal area. A copy of the Multi-Sector General Permit must be kept with your SWPPP. An electronic copy of the Permit and additional guidance materials can be viewed and downloaded at www.epa.gov/npdes/stormwater.

For tracking purposes, the following number has been assigned to your Notice of Intent Form:
NMR05GC92.

If you have general questions regarding the stormwater program or your responsibilities under the Multi-Sector General Permit, please call

EPA Region 6

Brent Larsen (214) 665-7523

If you have questions about your Notice of Intent form, please call the EPA NOI Processing Center at 1-866-352-7755 (toll free) or send an inquiry via the online form at <http://www.epa.gov/npdes/noicontact>.

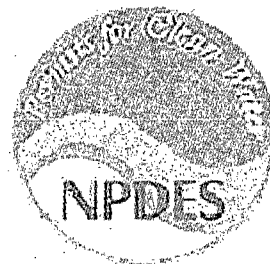
Next time, you can use the eNOI system (<[a href="http://www.epa.gov/npdes">http://www.epa.gov/npdes](http://www.epa.gov/npdes)).to apply for a Notice of Intent.

EPA NOI Processing Center
Operated by Avanti Corporation
1200 Pennsylvania Ave., NW
Mail Code: 4203M
Washington, DC 20460
1-866-352-7755

MSGP MONITORING REQUIREMENTS



U.S. ENVIRONMENTAL PROTECTION AGENCY
(EPA)
NATIONAL POLLUTANT DISCHARGE ELIMINATION
SYSTEM (NPDES)
EPA NOI Processing Center



Company: WILLIAMS FOUR CORNERS, LLC
ATTN: JAMES BAYS
192 CR 4900
Bloomfield, NM 87413

Facility: LYBROOK GAS
CONDITIONING PLANT
HCR 17 Box 360 Highway 550 MP 103
Cuba, NM 87013

Based on the information you provided in your NOI, you are subject to monitoring and subsequent reporting requirements. A summary of your monitoring requirements are provided below. Remember to review Part 9 of the MSGP 2007 to determine if you have additional state or tribal requirements (www.epa.gov/npdes/msgp). You may view and download monitoring guidance, including A Stormwater Sampling Guide for Industrial Facilities, at <http://www.epa.gov/npdes/msgp>. You may also now submit your monitoring results using the EPA's eReporting system at http://cdx.epa.gov/epa_home.asp.

You are also required to submit an annual report to EPA (see Part 7.2 of the MSGP). This report will contain the findings from your comprehensive site inspection, including a discussion of any corrective actions required during the reporting period. You will also need to submit an Exceedance Report to EPA if follow-up monitoring exceeds your effluent limitation guideline-based effluent limits (see Part 7.3), as well as any additional reports required under this permit (see Part 7.4).

Sector: I-Oil and Gas Extraction and Refining

Effluent Limitations Requirements		
Parameter	Value	Unit