GW - 60

GENERAL CORRESPONDENCE

YEAR(S):

2006 - 1999

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

November 7, 2007

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

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

Dear Mr. Lowe,

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

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

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

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

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

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

Respectfully submitted,

David Bays
Senior Environmental Specialist

Attachment

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

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

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

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

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

2006 AUG 23 AM 11 44

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

August 22, 2006

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

Re: Change of Company Name

Dear Mr. Price;

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

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

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

Sincerely,

David Bays
Senior Environmental Specialist

Attachments

xc: Clara Cardoza
Monica Sandoval
WFS FCA file 210

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

February 1, 2006

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

Re: Discharge Plan GW-060 and GW-233 Filing Fee

Dear Mr. Ford:

Enclosed please find check number 4027011497for $200.00 to cover the filling fee for the following Williams Field Services (WFS) Sites:

- Milagro Plant (GW-060)
- La Jara (GW-233)

The renewal applications were sent December 1, 2005 with a check for the incorrect amount. We apologize for any confusion. Williams Field Services appreciates your assistance in handling these and fees. If you have any questions or require additional information, please contact me at 505/632/4606.

Thank you,

Clara M Cardoza
Environmental Compliance

Xc: FCA Environmental File 220

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 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. 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. 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 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. Barets, 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 dischorge 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 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 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.

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 19th day of December 2005.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

MARK FEISMIER, P.E., Director

Legal No. 52868 published in The Daily Times, Farmington, New Mexico on Thursday, January 26, 2006.

THE SANTA FE
NEW MEXICAN
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RECEIVED
JAN 30 2006
Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

NM EMNRD OIL CONSERVATION
FRAN CHAVEZ
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56622
AD NUMBER: 00154422 ACCOUNT: 00002212
LEGAL NO: 78314 P.O. #: 06-199-050125
850 LINES 1 TIME(S) 476.00
AFFIDAVIT: 6.00
TAX: 36.75
TOTAL: 518.75

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, R, Lara, 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 #78314 a copy of which is hereto attached was published in said newspaper 1 day(s) between 01/27/2006 and 01/27/2006 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 27th day of January, 2006 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ R. Lara
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 27th day of January, 2006

Notary Laura E. Harding

Commission Expires: 11/23/07

OFFICIAL SEAL
Laura E. Harding
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 11/23/07

NOTICE OF PUBLICATION

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

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(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 wast 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. 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. 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 wa will be properly h dled, 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. Barets, 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 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 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 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 19th day of December 2005.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION

SEAL

MARK FEISMIER,
P.E., Director

Legal #78314
Pub. January 27, 2006

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Compressor Station (Milagro Plant, GW-060)

2. Operator: Williams Field Services Company

   Address: 188 CR 4900, Bloomfield, NM 87413

   Contact Person: David Bays Phone: 505-634-4971

3. Location: W/2 SE/4 Section 12 Township 29 North Range 11 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. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: David Bays Title: Sr. Environmental Specialist

Signature: Clarke Cady for Date: 11/30/2005

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

Clara
623-4606

Milagro Plant

NMOCD
Discharge Plan
GW-60

Williams Field Services
188 CR 4900
Bloomfield, NM 87413

Table of Contents

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1.0 TYPE OF OPERATION

The Milagro Plant is a natural gas conditioning and cogeneration plant for Williams Field Services. The facility is manned 24 hours per day.

2.0 LEGALLY RESPONSIBLE PARTY

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

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

3.0 LOCATION OF FACILITY

The Milagro Plant is located in Section 12, Township 29 North, Range 11 West, in San Juan County, New Mexico, approximately 2.5 miles east of Bloomfield, New Mexico. The facility latitude and longitude are North 36° 44.118,72' and West 107° 56.508,30'. A site location map is attached (USGS 7.5 Min. Quadrangles: Bloomfield, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section 12 of the text.

4.0 LANDOWNER

Williams Field Services owns the subject property.

5.0 FACILITY DESCRIPTION

The Milagro Plant, constructed in 1991, consists of a natural gas conditioning and a cogeneration plant. The gas conditioning plant is designed to remove carbon dioxide and water from raw natural gas. Plant processes include gas dehydration using triethylene glycol; carbon dioxide removal by contacting natural gas with methyldiethanolamine (MDEA); and glycol and MDEA regeneration. The processes used to separate hydrocarbons from field gas include heat exchangers, separators, dehydrators, above ground storage tanks, and other supporting equipment.

The cogeneration plant generates electricity using natural gas fuel. The exhaust gas heat is used to generate steam for use in the gas conditioning plant. In addition, there are various storage tanks, support structures and ancillary equipment. The facility layout is illustrated in Figure 2.

6.0 SOURCE, QUANTITY AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

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

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

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, certain absorbents, spill residues, 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, laboratory waste, empty drums, and waste water. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

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

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

8.0 STORM WATER PLAN

A Storm Water Pollution Prevention Plan has been prepared for this facility in accordance with federal requirements. A copy has been previously provided to the NMOCD under separate cover.

9.0 INSPECTION, MAINTENANCE AND REPORTING

Williams personnel will operate and maintain the facility 24 hours per day, 7 days per week, 52 weeks per year. An operator will monitor the facility for equipment malfunctions. Regular inspections will be conducted throughout the facility. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

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

10.0 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

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

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

11.0 SITE CHARACTERISTICS

The Milagro Plant is located approximately 2.5 miles east of Bloomfield, New Mexico. The site elevation is approximately 5,700 feet above mean sea level. The maximum relief over the site is approximately 40 feet. Regional surface water drainage is to the south-southeast along Hare Canyon Wash towards the San Juan River. Milagro Plant storm water drainage consists of Hare Canyon Wash, located west of the facility, and an unnamed arroyo located south of the facility. Intermittent flow from the site will follow natural drainage to the south, towards the unnamed arroyo. The unnamed arroyo drains into Hare Canyon Wash approximately 1 mile south of the Milagro Plant. The nearest down-gradient perennial source of surface water is the San Juan River, located approximately 1.9 miles south of the site, at an elevation of approximately 5,530 feet.

A review of the available hydrologic data (1,2) for this area revealed that there are no water wells within a ¼-mile radius of the Milagro Plant. The closest wells are at least one-half mile away. The Nacimiento Formation is the water-bearing unit underlying the site. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 40 feet. The total dissolved solids concentration of area ground water is expected to range from 2,800 to 3,200 parts per million.

The table below presents available information provided for the wells 0.5 – 1 mile from the site.

Township; Range; Section	Quarter[a]	Apx. Distance from Site (mi)	Well #	Use[b]	Well Depth (ft)	Water Bearing Stratifications (ft)	Description	Depth to Water (ft)
29N; 11W; 14	223	~1	SJ 00007	ind	752	435-496; 510-735; 736-752	Other/Unknown	
29N; 11W; 13	N1/2 of4	0.5 – 0.75	SJ 00987	dom	415	410-415	Sandstone/Gravel/Conglomerate	300
29N; 11W; 14	14	~1	SJ 01426	Dom	155	120-155	Sandstone/Gravel/Conglomerate	10
29N; 11W; 14	342	~0.5	SJ 01774	Dom	82	77-81	Shallow Alluvium/Basin Fill	6
29N; 11W; 14	421	~1	SJ 03164	Dom	75	65-75	Sandstone/Gravel/Conglomerate	56
29N; 11W; 14	421	~1	SJ 03175	Dom	60	24-60	Sand and Clay	24
29N; 10W; 18	131	~0.5	SJ 03023	Dom	90	80-90	Sand and Gravel	65

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

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

References

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

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

12.0 FACILITY CLOSURE PLAN

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

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

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

TABLES

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Waste Water	Produced Water, Boiler Blowdown; Sulfinol Pump Building; Sulfinol Reclaimer; and secected process containment drains	1000-4000 gal/day	Water, Amine, Amine Salts, Glycol and Storm Water
Laboratory Waste	Laboratory	50-100 gal/month	No Additives
Used Oil, Glycol, Amine, Ambitrol, and Water Mixture	Filter Drain Pad	1-10 bbl/month	Used Motor Oil; Glycol; Amine; and Ambitrol with no additives
Used Oil	Turbines and Oil Skimmer	10-50 bbl/month	Used Motor Oil w/ No Additives
Used Oil Filters	Turbines	50-100 filters/year	No Additives
Used Process Filters	Air, Inlet, Fuel Gas, Oil, Glycol, Ambitrol	1400-3000 filters/year	No Additives
Empty Drums/Containers	Liquid Containers	200-400/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

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Waste Water	Above Ground Storage Tank	3 @ 5024 bbl	Berm	Non-exempt	Evaporation is performed at this WFS facility or transported for disposal at an approved disposal facility. A Waste Accceptance Profile will be filed with the disposal facility.
Laboratory Waste	Drum or other container	Varies	Berm	Non-exempt	Transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility.
Used Oil, Glycol, Ambitrol, and Water Mixture	Above Ground Storage Tank	2 @ 250 bbl	Berm	Non-exempt	Transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Evaporation Basins	Open basin	3 @ 211,000 gal	Lined basin with secondary containment	Exempt	Evaporation is performed at this WFS facility or transported for disposal at an approved disposal facility. A Waste Accceptance Profile will be filed with the disposal facility.
Slop Oil Storage Tank	Above Ground Storage Tank	2 @ 10,500 gal	Concrete containment	Exempt	Transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Used Oil	Above Ground Storage Tank	1000 gal; 100 bbl	Berm	Non-exempt	May be hauled to 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 Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Exempt	Consolidated on site, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Spill Residue (I.e., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Consolidated on site, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm	Non -exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Stearnate Storage Tank	Above Ground Storage Tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Cortrol Storage Tank	Above Ground Storage Tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Polymer Storage Tank	Above Ground Storage Tank	400 gal	Poly containment and building sump	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Amine Storage Tank	Above Ground Storage Tank	10,500 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Amine Mix Storage Tank (50-50 mix with deionized water)	Above Ground Storage Tank	500 bbl; 100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Amine Mix Storage Tank (50-50 mix with deionized water)	Above Ground Storage Tank	100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
TEG Storage Tank	Above Ground Storage Tank	100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
TEG Mix Storage Tanks (50-50 mix with deionized water)	Above Ground Storage Tank	2 @ 100 bbl	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Petroleum Solvent	Above Ground Storage Tank	300 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Dielectric Oil	Transformers	2 @ 4233 gal; 2 @ 456 gal; 4 @ 233 gal	N/A	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Gasoline	Above Ground Storage Tank	500 gal	Concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel Fuel	Above Ground Storage Tank	1175 gal; 500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel Fuel	Above Ground Storage Tank	1250 gal	Inside semi trailer with earthen containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Turbine Lube Oil	Above Ground Storage Tank	2 @ 2300 gal	Inside building with concrete containment	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Oil Skimmer Tank	Above Ground Storage Tank	1000 gal;	Concrete containment	N/A	Separation system. Oil phase goes to slop oil tank; water phase goes to evaporation pond.

FIGURES

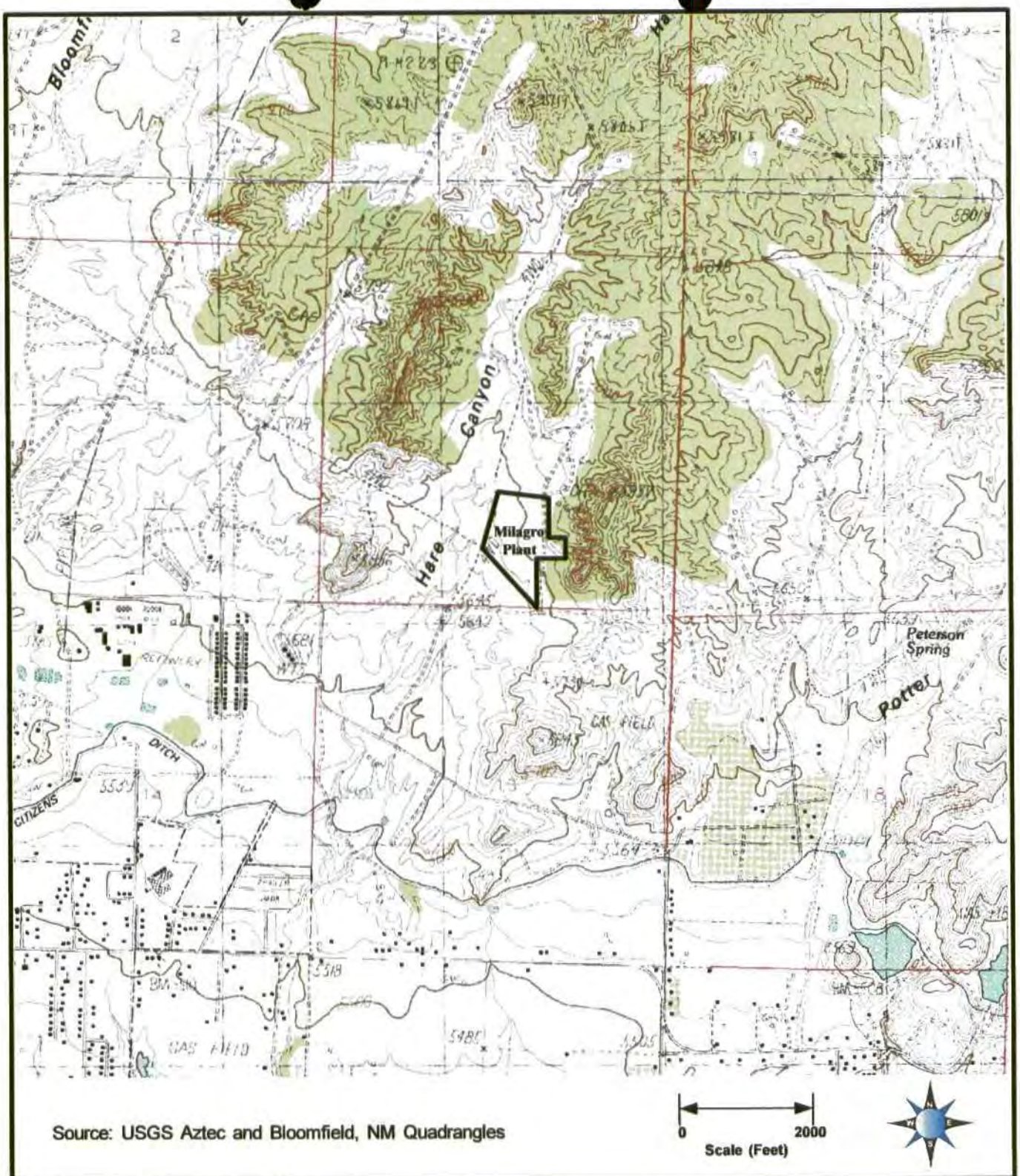
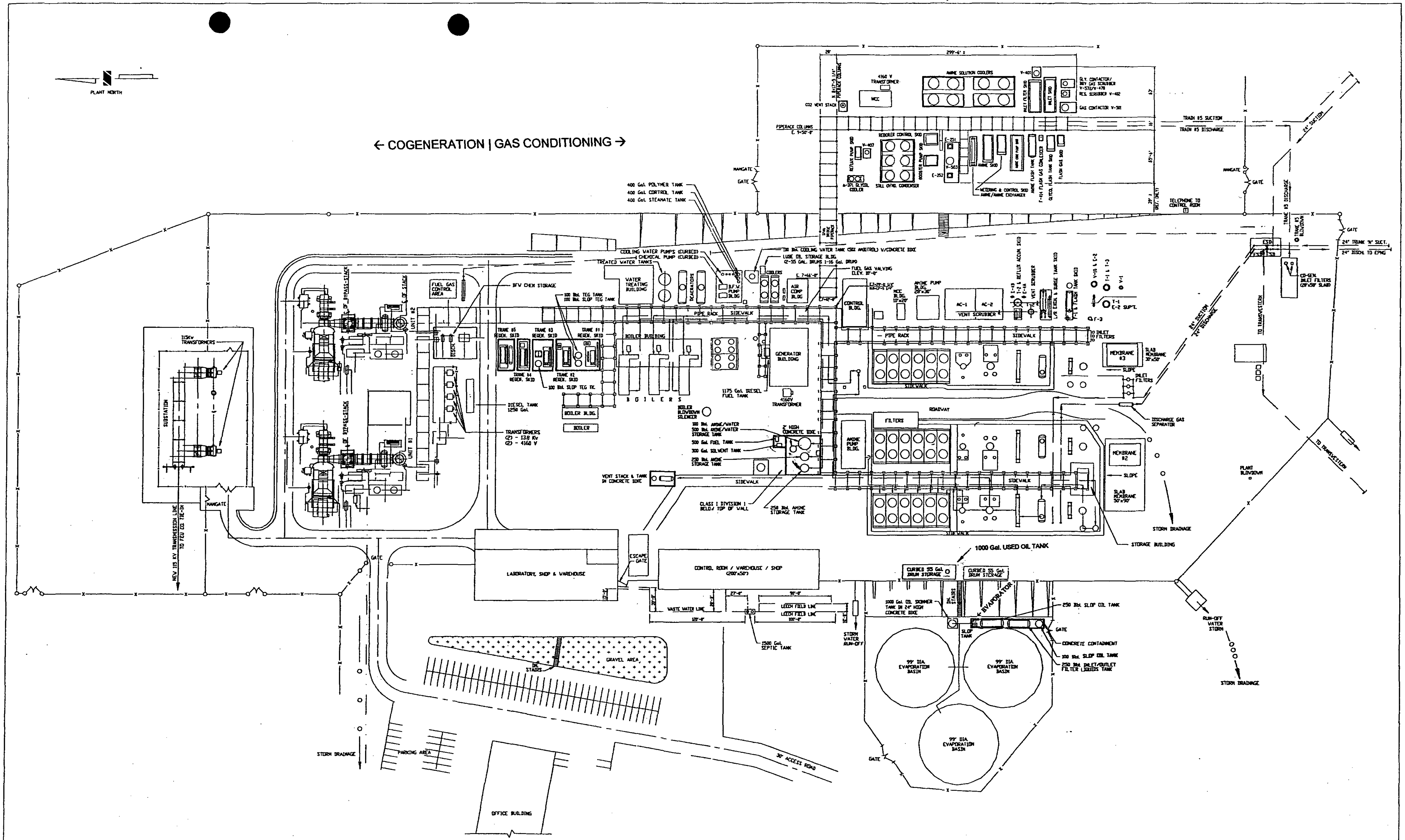


Figure 1 Site Vicinity / Topographic Map

Milagro Plant

Section 12, Township 29N Range 11W

San Juan County, New Mexico


PLANT NORTH
← COGENERATION | GAS CONDITIONING →
SUBSTATION
115Kv TRANSFORMERS
NEW 115 KV TRANSMISSION LINE TO FEU CO. TIE-IN
MANGATE
GATE
FUEL GAS CONTROL AREA
BFW CHEM STORAGE
UNIT #2
UNIT #1
DIESEL TANK 1250 Gal.
TRANSFORMERS (2) - 13.8 Kv (2) - 4160 V
TRAIN #5 REGEN. SKID
TRAIN #3 REGEN. SKID
TRAIN #1 REGEN. SKID
TRAIN #4 REGEN. SKID
TRAIN #2 REGEN. SKID
100 Bbl. TEG TANK
100 Bbl. SLOP TEG TANK
100 Bbl. SLOP TEG TK.
BOILER BUILDING
BOILERS
BOILER BLDG.
BOILER
BOILER BLOWDOWN SILENCER
COOLING WATER PUMPS (CURBED)
CHEMICAL PUMP (CURBED)
TREATED WATER TANKS
WATER TREATING BUILDING
DEAERATORS
400 Gal. POLYMER TANK
400 Gal. CORTROL TANK
400 Gal. STEAMATE TANK
B.F.W. PUMP BLDG.
COOLERS
AIR COMP BLDG.
LUBE OIL STORAGE BLDG.
FUEL GAS VALVING
GENERATOR BUILDING
1175 Gal. DIESEL FUEL TANK
4160V TRANSFORMER
PIPE RACK
SIDEWALK
CONTROL BLDG.
MCC BLDG.
AMINE PUMP BLDG.
AC-1
AC-2
VENT SCRUBBER
MEMBRANE #3
MEMBRANE #2
SLAB MEMBRANE
INLET FILTERS
DISCHARGE GAS SEPARATOR
ROADWAY
FILTERS
AMINE PUMP BLDG.
SLOPE
STORM DRAINAGE
STORAGE BUILDING
PLANT BLOWDOWN
TO TRANSWESTERN
CO-GEN. INLET FILTERS
24" SUCTION
24" DISCHARGE
24" TRUNK 'N' SUCT.
24" DISCH. TO EPNG
TRAIN #5 SUCTION
TRAIN #5 DISCHARGE
TELEPHONE TO CONTROL ROOM
4160 V TRANSFORMER
MCC
AMINE SOLUTION COOLERS
REBOILER CONTROL SKID
STILL OVHD. CONDENSER
AMINE SKID
GAS CONTACTOR V-301
PIPERACK COLUMNS
100 Bbl. AMINE/WATER
500 Bbl. AMINE/WATER STORAGE TANK
500 Gal. FUEL TANK
300 Gal. SOLVENT TANK
250 Bbl. AMINE STORAGE TANK
2' HIGH CONCRETE DIKE
VENT STACK & TANK IN CONCRETE DIKE
CLASS I DIVISION 1 BELOW TOP OF WALL
250 Bbl. AMINE STORAGE TANK
LABORATORY, SHOP & WAREHOUSE
ESCAPE GATE
CONTROL ROOM / WAREHOUSE / SHOP (200'x50')
1000 Gal. USED OIL TANK
CURBED 55 Gal. DRUM STORAGE
WASTE WATER LINE
LEECH FIELD LINE
1500 Gal. SEPTIC TANK
STORM WATER RUN-OFF
1000 Gal. OIL SKIMMER TANK IN 24" HIGH CONCRETE DIKE
EVAPORATOR
SLOP TANK
250 Bbl. SLOP OIL TANK
CONCRETE CONTAINMENT
100 Bbl. SLOP OIL TANK
250 Bbl. INLET/OUTLET FILTER LIQUIDS TANK
99' DIA. EVAPORATION BASIN
RUN-OFF WATER STORM
GRAVEL AREA
STAIRS
PARKING AREA
30' ACCESS ROAD
OFFICE BUILDING

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

REFERENCE DRAWINGS | REFERENCE DRAWINGS | REVISIONS

DRAFTING	BY	DATE
DRAWN BY		
CHECKED BY		
APPROVED BY		
ENGINEER	**BY**	**DATE**
DESIGNED BY		
PROJ. APPROVED		

STATE:
COUNTY:

MILAGRO GAS CONDITIONING PLANT
PLOT PLAN

Figure 2

SCALE:
W.O. NO.
SHEET OF
REV

APPENDICES

APPENDICES

Appendix A
WFS Spill Control Procedures

RELEASE/SPILL REPORTING

MATERIAL SAFETY DATA SHEETS

CHEMICAL EXPOSURES/POISONINGS

Dial

24HRS/DAY - 7DAYS/WEEK

1-888-677-2370

Info you should have when calling:

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

3E COMPANY

1905 Aston Avenue, Carlsbad, CA 92008

Telephone: 760-602-8700

Fax: 760-602-8888

Release/Spill Report Form

Month | Day | Year

Release Verification Time: | Release Stop Time:

Region | District | Area

Location Name | Location Identifier

Mainline Name | Mainline Identifier

Area Manager | Company Asset | State

Address | County | Zip Code

Release Discovered by: | Time

Release Reported by: | Time

Section | Township | Range | Milepost | Tract #

Offshore | Latitude | Longitude

Release Reportable? | Waterway Affected? | Name

Report	Date	Number	Time	Name	Title	City	State
NRC ☐							
SERC ☐							
LEPC ☐							
TRRC ☐							
EPA ☐							
Other ☐							

Product Released: | Total BBL's Released | 0

BBL's Recovered Wet | 0

Cause of Release: | BBL's Recovered Soil | 0

Total BBL's Recovered | 0

Released To: | Other: | BBL's Not Recovered | 0

Remarks:

Origin Of Release:

Temperature | Relative Humidity | Precipitation

Cloud Cover | Wind Speed | Wind Direction

Injury | Death | Fire | Explosion

Unconsciousness | Hospitalization

Loss/Damage Estimate

Incident Investigator:

Environmental Contact for this Release:

Safety Contact for this Release:

Compliance Administrator for this area:

Form completed by:

Completion Date:

Form was e-mailed to Williams on:

1.0 PURPOSE

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

Note 1:

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

Note 2:

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

2.0 PROCEDURE

2.1 Offshore Release Reporting (w/sheen on water)

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

2.1.1.1 Any release that causes sheen on water.

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

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

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

2.2.1.1 Any Gas release >50 MSCF;

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

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

2.2.1.4 Any unintentional, non-maintenance related release ≥5 gallons of a Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;

2.2.1.5 Any release of Hazardous Liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or

2.2.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.3.2.1 through 2.3.1.6.

2.2.2 The Environmental Specialist and the DOT Compliance Coordinator will determine reportability and, if required, perform telephonic notifications in accordance with applicable regulations.

2.2.3 The Environmental Specialist will complete the WES - 35 Release Report Form and forward to the Release Report Database Compliance Specialist in Tulsa within 10 working days.

2.2.4 The Environmental Specialist will complete any required follow-up written reports and/or documentation for non-transportation events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.

2.2.5 The DOT Compliance Coordinator will complete any required follow-up reports and/or documentation for transportation related events within regulatory timeframes in accordance with the Telephonic and Written Release Reporting Requirements.

2.3 Onshore Releases

2.3.1 Immediately report to 3E Company at 888-677-2370 (toll free) the following type(s) of onshore release(s) or event(s):

2.3.1.1 Any liquid release that enters, or is expected to enter, any waterway (i.e., ditch, arroyo, intermittent stream, etc.);

2.3.1.2 Any individual liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) >1 gallon;

2.3.1.3 Any cumulative liquid release (i.e., gasoline, diesel, MDEA, TEG, NGL, etc.) >5 gallons within a 24-hour period (drips, pinhole leaks, etc.). (NOTE: Report immediately upon determining, or suspecting that the 5 gallon/24 hour threshold will be met or exceeded);

2.3.1.4 Any Gas release >50 MSCF;

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

2.3.1.6 Any DOT Jurisdictional Pipeline or Pipeline Facility event that results in estimated property damage, including cost of Gas or hazardous liquids lost and/or, costs of clean up or recovery of the operator **and/or** others ≥ $50,000;

2.3.1.7 Any unintentional, non-maintenance related release ≥5 gallons of a hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility;

2.3.1.8 Any release of hazardous liquid from a DOT Jurisdictional Pipeline or Pipeline Facility that results in explosion or fire not intentionally set by the operator; or

2.3.1.9 Any DOT Jurisdictional Pipeline or Pipeline Facility event that is significant, in the judgment of the operator, even though it did not meet any of the criteria in 2.4.1.1 through 2.4.1.8.

2.3.2 3E Company will immediately make the required telephonic notifications in accordance with the Telephonic and Written Release Reporting Requirements.

2.3.3 Information that will be needed when reporting to 3E is on WES-35 - Release Report Form.

2.3.4 Refer to the Onshore Release/Spill Notification Flowchart for more information regarding the onshore reporting workflow.

2.3.5 The Environmental Specialist will follow-up with Operations to verify that adequate response and reporting measures have been taken for each release and track closure of each release report with appropriate regulatory agencies.

Note:

Flares and Thermal Oxidizers

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

2.4 Planned / Scheduled Blowdowns

2.4.1 Notify your Environmental Specialist as far as possible in advance of planned / scheduled blowdowns that are not an exception per 2.5 of this procedure.

2.4.2 Be prepared to provide to your Environmental Specialist a current extended chromatographic analysis of the product to be released.

2.4.3 The Environmental Specialist will:

2.4.3.1 Review information provided;

2.4.3.2 Notify appropriate agencies;

2.4.3.3 Obtain required permits or permissions;

2.4.3.4 Provide Operations with any special conditions and / or limitations to be observed before, during, and/or after the planned / scheduled blowdown event; and

2.4.3.5 Perform any required post event reporting or follow-up to agencies.

2.5 Exceptions to Procedure:

2.5.1 Sheen on rainwater within facilities, dikes, valve boxes, etc.. that is not the result of a release event. However, one must follow proper disposal and housekeeping practices for these cases.

2.5.2 Routine releases to pollution control devices (flares, thermal oxidizers, etc.) **in accordance with permit conditions or limitations.**

2.5.3 Site-specific procedures may qualify as an exception, if reviewed and approved by your Environmental Specialist.

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

2.5.1 Within 45 days of any release that affected soil or water, Operations will submit to the Environmental Specialist the following information:

2.5.1.1 Quantity of soil, water, or product removed as a result of a release;

2.5.1.2 Disposition of soil, water, or product removed (i.e., land, farm, landfill, disposal, etc.);

2.5.1.3 Update of costs incurred because of release. (Includes value of lost product, repair costs response costs, clean up costs, disposal costs, etc.)

2.5.1.4 Environmental Specialist will update release database with additional information from 2.5.1.1 through 2.5.1.3.

2.6 Release Database

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

3.0 REFERENCES

3.1 Regulatory

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

3.1.2 49 CFR 191, 192 and 195

3.2 Related Policies/Procedures

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

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

4.0 DEFINITIONS

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

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

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

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

4.5 **Onshore Release** - Any release that does not occur offshore in a Tidally Affected Zone.

4.6 **Tidally Affected Zone** - Relating to or affected by tides: *the tidal maximum; tidal pools; tidal waters.*

4.7 **DOT jurisdictional Pipeline or Pipeline Facility** – Pipeline or pipeline facility subject to 49 CFR Parts192 or 195.

4.8 **Hazardous Liquid** – Per 49 CFR 195.2 - petroleum, petroleum products, or anhydrous ammonia.

➢➢➢End of Procedure≺≺≺

System Integrity Plan Change Log

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

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

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

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

1.0 PURPOSE

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

2.0 PROCEDURE

2.1 At least Annually, perform visual inspections of oil storage tanks and containers (single containers with capacities >55 gallons) for signs of deterioration, discharges or accumulation of oil inside diked areas. Document Inspections on 0019 – External Visual Tank Inspection form.

2.2 Test each aboveground container for integrity on a regular schedule and whenever you make material repairs. These tests are performed in accordance with SIP-ADM-7.15 - Aboveground Storage Tank Integrity

2.3 Perform maintenance or repairs necessary to prevent or stop leaks or releases and document the work following company maintenance and repair procedures.

2.4 Maintain appropriate spill response equipment at an easily accessible location at the facility and ensure facility personnel are trained on the materials and their use(s).

2.5 Routine releases of storm water from containment areas shall be documented on WES-87 – Record of Secondary Containment Discharge. All other releases will be reported according to 6.04-ADM-002 – Release Reporting procedure.

2.6 Facility Pollution Prevention Plans

2.6.1 The oil pollution prevention regulations include two plans related to non-transportation onshore facilities. The most common is the Spill Prevention Control and Countermeasure (SPCC) Plan. The second is the Facility Response Plan (FRP).

2.6.1.1 An SPCC Plan is a written document that describes the steps a facility takes to prevent oil spills and to minimize the risk of harm to the environment.

2.6.1.2 A Facility Response Plan is a written document that

describes the procedures for responding to a spill.

NOTE

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

2.6.2 The Environmental Specialist is responsible for preparation of SPCC plans or FRPs.

2.6.3 Operations is responsible for:

2.6.3.1 Reviewing draft plan(s), providing comments to the Environmental Specialist (ES) and meeting published timeframes for reviews and comments

2.6.3.2 Ensuring it is capable of complying with the document upon publication

2.6.3.3 Reviewing the plan(s) Annually and providing revisions or updates to the ES

2.6.3.4 Performing inspections required by the plan(s)

2.6.3.5 Maintaining documentation required by the plan(s) on the appropriate forms

2.6.3.6 Conducting annual drills if an FRP is in-place for the facility

2.6.3.7 Ensuring adequate response contractors are available in the area

2.6.3.8 Providing to the ES a current site survey to allow for secondary containment calculations to be conducted.

2.6.4 Requirements to Maintain Records - The facility is required to maintain all inspection logs, secondary containment drainage logs, etc., for a period of 5 years. These records must be maintained in a centralized location at the facility and must be easily accessible to an inspector.

2.6.5 Requirements to Maintain the EMIS - The EMIS will be populated with all requirements of the facility's plans (SPCC/FRP) and any associated best management practices. The Environmental Group (ES, and CA) is responsible for maintaining the database.

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

3.0 REFERENCES

3.1 Regulatory

3.1.1 Oil Pollution Prevention Act of 1990

3.1.2 40 CFR 112, Oil Pollution Prevention (EPA)

3.1.3 Applicable state, regional and local regulations

3.2 Related Policies/Procedures

3.2.1 Training CD for SPCC Plans

3.2.2 SIP-ADM-7.15 - Aboveground Storage Tank Integrity

3.3 Forms and Attachments

3.3.1 WES-87 – Record of Secondary Containment Discharge

3.3.2 WES-35 - Release Report Form

3.3.3 6.04-ADM-002 - Release Reporting

3.3.4 6.04-ADM-003 – Plans Required for Facilities-Pipelines

3.3.5 0019 – External Visual Tank Inspection

3.3.6 SIP-ADM-12.01 - Emergency Response and Planning

3.3.7 Spill Prevention Control and Countermeasure (SPCC) Plan

3.3.8 Facility Response Plan

3.3.9 SIP Feedback/Change Request

4.0 DEFINITIONS

4.1 **Aboveground Storage Tank (AST)** – A tank that has all its surfaces above the existing grade so as to allow visual inspection of all the tank surfaces.

4.2 **DOT** – Department of Transportation

4.3 **EPA** – Environmental Protection Agency

4.4 **Facility** – Any terminal, facility, pipeline, etc. owned or operated by Williams.

4.5 **Facility Response Plan** - Required for any non-transportation related facility that could be expected to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines.

4.6 **MMS** – Minerals Management Service

4.7 **Navigable Waters** – The Clean Water Act defines the navigable waters of the United States as the following: all navigable waters, as defined in judicial decisions prior to the passage of the Clean Water Act, and tributaries of such waters; interstate waters; intrastate lakes, rivers, and streams that are used by interstate travelers for recreational or other purposes; and intrastate lakes, rivers, and streams from which fish and shellfish are taken and sold in interstate commerce.

4.8 **Oil** – Oil of any kind or any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. The EPA accepts the definition of oil as the list provided by the USCG at http://www.uscg.mil/vrp/faq/oil.shtml.

4.9 **Oil Pollution Act (OPA) of 1990** – OPA 1990 requires regulated facilities to submit spill response plans that address the facility owner's or operator's ability to respond to a "worst-case discharge." OPA 90 is being implemented by EPA under 40 CFR 112, Oil Pollution Prevention, Section 112.20, Facility Response Plans.

4.10 **Oil Spill Response Plan** – An Oil Spill Response Plan provides information on responding to a spill at a facility and is intended to satisfy the requirements of the Oil Pollution Act of 1990; Facility Response Plan requirements of 40 CFR 112, Oil Pollution Prevention (EPA); Pipeline Response Plan requirements of 49 CFR 194, Response Plans for Onshore Oil Pipelines (RSPA); Facility Response Plan requirements of 33 CFR 154 Subpart F, Response Plans for Oil Facilities (USCG); and 30 CFR 254, Oil-Spill Response Requirements for Facilities Located Seaward of the Coast Line (MMS).

4.11 **OSRO** – Oil Spill Response Organization

4.12 **PREP** – National Preparedness for Response Exercise Program

4.13 **Release** – synonymous with spill in this document. Williams' definition of a release is contained in the Release Reporting Guidelines which is maintained by the Environmental Group.

4.14 **RSPA** – Research and Special Programs Administration

4.15 **Spill Prevention, Countermeasures, and Control (SPCC) Plan** – An SPCC Plan provides information on spill prevention at a facility and is intended to satisfy the requirements of the SPCC Plan requirements in 40 CFR 112, Oil Pollution Prevention.

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

4.17 USCG – United States Coast Guard

➢➢➢End of Procedure≺≺≺

System Integrity Plan Change Log

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

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

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

Appendix B
NMOCD Notification and Corrective Action

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name of Company	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

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

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ 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:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
E-mail Address:	Conditions of Approval:	Attached ☐
Date: Phone:		

* Attach Additional Sheets If Necessary

Appendix C
Public Notice

PUBLIC NOTICE

Notice of Discharge Plan Renewal Application

Milagro Compressor Station

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

The facility, located in Section 12, Township 29 North, Range 11 West, San Juan County, New Mexico, approximately 2.5 miles east of Bloomfield, consists of a natural gas conditioning and a cogeneration plant.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be approximately 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 2800-3200 parts per million.

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

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

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

La Nota PUBLICA

la NOTA de la Aplicación de la Renovación del Plan de la Descarga

Milagro Plant

Según los requisitos de la Regulación de la Comisión de Control de calidad de Agua de nuevo méxico 20 2.6.2 de NMAC – el SUELO Y la PROTECCION de AGUA de SUPERFICIE, Williams Field Service de 188 Camino de Condado 4900, Bloomfield, NM 87413, por la presente anuncian que la intención para aplicar a la División de la Conservación del Petróleo de nuevo méxico para renovar el Plan de la Descarga para la Planta de Milagro. William esperan someterse la aplicación del permiso a la División de la Conservación del Petróleo en diciembre 2005.

La facilidad, localizado en la Sección 12, Municipio 29 al norte, la Gama 11 al oeste, el Condado de San Juan, nuevo méxico, aproximadamente 2.5 este de millas de Bloomfield, consiste en un gas natural que condiciona y una planta de cogeneration.

Las direcciones del permiso de la descarga cómo rocian, los escapes, y otras descargas accidentales a la superficie se manejarán. La facilidad no descarga wastewater para surgir ni aguas subterráneas. Todo malgasta engendrado será almacenado temporalmente en tanques o contenedores. El desecho envió offsite se dispondrá o será reciclado en un OCD aprobó el sitio. En caso de una descarga accidental, molió agua muy probable no se afectará. La profundidad estimada de la agua del suelo en el sitio se espera ser aproximadamente 40 pies. El suma se disolvió la concentración de sólidos de agua de suelo de área se espera estar en la gama de 2800-3200 partes por millón.

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

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

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

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

November 29, 2005

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Milagro Plant (GW-60). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during December 2005.

The facility, located in Section 12, Township 29 North, Range 11 West, San Juan County, New Mexico, approximately 2.5 miles east of Bloomfield, consists of a natural gas conditioning and a cogeneration plant.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be approximately 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 2,800-3,200 parts per million.

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

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

Respectfully submitted,

Clara Cardoza
Environmental Compliance Administrator

7004 2890 0002 4203 4629

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

Postage	$ $0.37
Certified Fee	$2.30
Return Receipt Fee (Endorsement Required)	$1.75
Restricted Delivery Fee (Endorsement Required)	$0.00
Total Postage & Fees	$ $4.42

0243
34
Postmark
11/29/2005

Sent To: BLM
Street, Apt. No.; or PO Box No.: 1235 N. La Plata Hwy
City, State, ZIP+4: Farmington, NM 87401
PS Form 3800, June 2002 — See Reverse for Instructions

Williams
Four Corners Area
Environmental Department
#188 CR 4900
Bloomfield, N.M. 87413
Phone: (505) 634-4956
Fax: (505) 632-4781

May 23, 2002

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

Re: **Milagro Gas Conditioning Plant (GW-60) Storm Water Plan**

Dear Mr. Ford:

The Storm Water Pollution Prevention Plan (SWP3) for the Milagro Gas Conditioning and Cogeneration Plant is attached to this letter. The SWP3 was implemented to fulfill the requirements of Section 405 of the Water Quality Act of 1987, which added Section 402(p) to the Clean Water Act. This section dictated that the Environmental Protection Agency (EPA) establish regulations setting forth National Pollutant Discharge Elimination System (NPDES) permit application requirements for storm water discharges associated with industrial activity. The SWP3 is designed to fulfill NPDES permit requirements.

If you have any questions or require additional information, I can be reached at (505) 634-4956.

Sincerely,

E Holiday

Ethel Holiday
Environmental Compliance Specialist

Attachments: Milagro Plant Storm Water Pollution Prevention Plan

Xc: Denny Foust, Aztec OCD

Williams
Four Corners Area
Environmental Department
#188 CR 4900
Bloomfield, N.M. 87413
Phone: (505) 634-4956
Fax: (505) 632-4781

February 27, 2002

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

Re: **Milagro Plant (GW-60) Discharge Plan Modification**

Dear Mr. Ford:

Please be advised WFS is the process of installing an evaporator. The purpose of the evaporator is to increase evaporation capacity of plant's environmental drain system. The evaporator will receive a portion of the oil/water separator discharge water. The other portion of the oil/water separator discharge water will continue to be directed to the evaporation ponds.

The evaporator is located within an existing concrete containment. The evaporator location is highlighted on attached facility plot plan. The evaporator will utilize excess heat from the plant.

As described in the OCD Discharge Plan, the separated liquids consist of water, amine, amine salts, glycol, oil, and storm water. After the evaporation process, the concentrated liquids will be disposed in accordance with the OCD Discharge Plan.

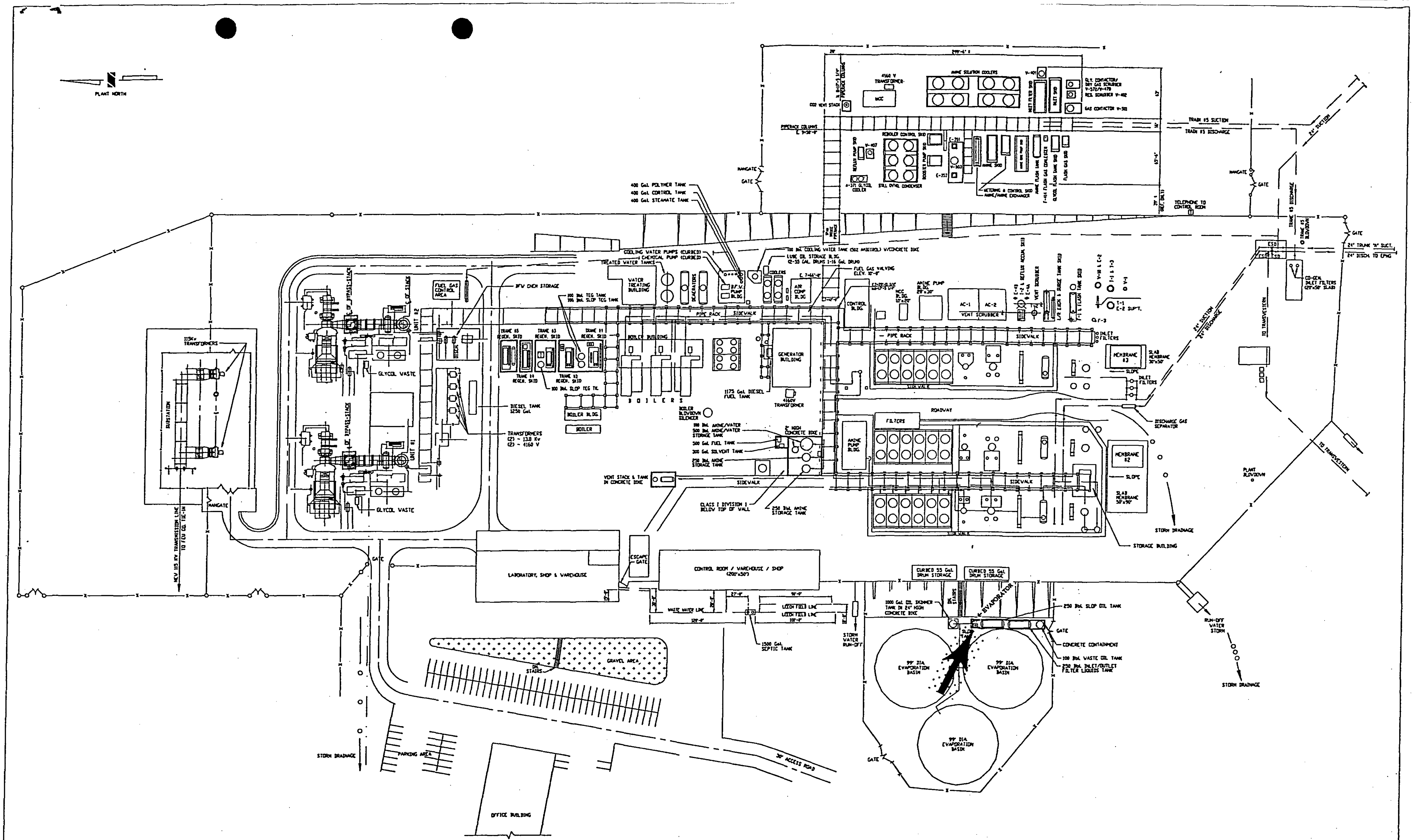
Please make note of this change in the facility's Discharge Plan.

If you have any questions or require additional information, I can be reached at (505) 634-4956.

Sincerely;

Ethel Holiday
Environmental Compliance Specialist

Attachment: Milagro Plant Plot Plan
Xc: Denny Foust, Aztec OCD



PLANT NORTH
115Kv TRANSFORMERS
SUBSTATION
MANGATE
NEW 115 KV TRANSMISSION LINE TO FEU CO. TIE-IN
UNIT #2
UNIT #1
GLYCOL WASTE
FUEL GAS CONTROL AREA
BFW CHEM STORAGE
TRAIN #5 REGEN. SKID
TRAIN #3 REGEN. SKID
TRAIN #1 REGEN. SKID
TRAIN #4 REGEN. SKID
TRAIN #2 REGEN. SKID
100 Bbl. TEG TANK
100 Bbl. SLOP TEG TANK
100 Bbl. SLOP TEG TK.
DIESEL TANK 1250 GaL
TRANSFORMERS (2) ~ 13.8 Kv (2) ~ 4160 V
BOILER BLDG.
BOILER
BOILER BUILDING
BOILERS
400 GaL POLYMER TANK
400 GaL CONTROL TANK
400 GaL STEAMATE TANK
COOLING WATER PUMPS (CURBED)
CHEMICAL PUMP (CURBED)
TREATED WATER TANKS
WATER TREATING BUILDING
DEAERATORS
B.F.W. PUMP BLDG.
COOLERS
AIR COMP. BLDG.
LUBE OIL STORAGE BLDG.
FUEL GAS VALVING
PIPE RACK
SIDEWALK
GENERATOR BUILDING
1175 GaL DIESEL FUEL TANK
4160V TRANSFORMER
BOILER BLOWDOWN SILENCER
2' HIGH CONCRETE DIKE
500 GaL FUEL TANK
300 GaL SOLVENT TANK
250 Bbl. AMINE STORAGE TANK
VENT STACK & TANK IN CONCRETE DIKE
CLASS I DIVISION 1 BELOW TOP OF WALL
250 Bbl. AMINE STORAGE TANK
CONTROL BLDG.
MCC BLDG.
AMINE PUMP BLDG.
AC-1
AC-2
VENT SCRUBBER
INLET FILTERS
MEMBRANE #3
SLAB MEMBRANE 30'x50'
SLOPE
ROADWAY
FILTERS
AMINE PUMP BLDG.
MEMBRANE #2
SLAB MEMBRANE 30'x90'
DISCHARGE GAS SEPARATOR
PLANT BLOWDOWN
STORM DRAINAGE
STORAGE BUILDING
4160 V TRANSFORMER
MCC
CO2 VENT STACK
AMINE SOLUTION COOLERS
INLET FILTER SKID
INLET SKID
GAS CONTACTOR V-501
PIPERACK COLUMNS
REBOILER CONTROL SKID
STILL OVHD. CONDENSER
AMINE SKID
METERING & CONTROL SKID
AMINE/AMINE EXCHANGER
FLASH GAS SKID
TRAIN #5 SUCTION
TRAIN #5 DISCHARGE
24" SUCTION
24" DISCHARGE
TELEPHONE TO CONTROL ROOM
GATE
ESD
CO-GEN INLET FILTERS
TO TRANSWESTERN
LABORATORY, SHOP & WAREHOUSE
ESCAPE GATE
CONTROL ROOM / WAREHOUSE / SHOP (200'x50')
WASTE WATER LINE
LEACH FIELD LINE
1500 GaL SEPTIC TANK
STORM WATER RUN-OFF
CURBED 55 GaL DRUM STORAGE
1000 GaL OIL SKIMMER TANK IN 24" HIGH CONCRETE DIKE
EVAPORATOR
250 Bbl. SLOP OIL TANK
CONCRETE CONTAINMENT
100 Bbl. WASTE OIL TANK
250 Bbl. INLET/OUTLET FILTER LIQUIDS TANK
99' DIA. EVAPORATION BASIN
RUN-OFF WATER STORM
GRAVEL AREA
PARKING AREA
30' ACCESS ROAD
OFFICE BUILDING

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

REFERENCE DRAWINGS | REFERENCE DRAWINGS | REVISIONS

DRAFTING	BY	DATE	STATE:
DRAWN BY			COUNTY:
CHECKED BY			
APPROVED BY			
ENGINEER	BY	DATE	
DESIGNED BY			SCALE:
PROJ. APPROVED			W.O. NO.

SHEET | REV

Williams
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;

Mark J. Bareta
Senior Environmental Specialist

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

October 24, 2001
AMEC Project No. 1-517-000064

Mr. Mark Bareta
Williams Field Services
188 CR 4900
Bloomfield, New Mexico 87413

RE: Drain Line Testing
Williams Field Services Milagro Plant
Bloomfield, New Mexico

Dear Mr. Bareta,

AMEC Earth & Environmental, Inc. (AMEC) is pleased to provide Williams Field Services (WFS) with results of hydrostatic testing for the subsurface, non-pressurized, process and wastewater drain system at the WFS Milagro Plant located near Bloomfield, New Mexico. Only subsurface, non-pressurized process and wastewater lines were tested according to the facilities' Oil Conservation Division (OCD) Ground Water Discharge Plan requirements.

AMEC mobilized to the site and attended plant orientation on August 10, 2001. Drain line testing activities began on August 13, 2001. The work was completed on August 22, 2001. AMEC's on-site crew consisted of Bruce Hare (Site Supervisor) and a 3-man field crew.

The underground pipelines carrying process or wastewater were isolated. Each isolated system was filled with clean water and air was removed. A water-filled riser of sufficient height was used to provide a minimum of 3 pounds per square inch above normal operating pressure (all risers were at least 8-feet in height). A system was considered passing or non-leaking when the height of the water column held steady for a period of 30 to 60 minutes. Any leaks encountered were repaired by WFS's mechanical contractor Industrial Mechanical, Inc. (IMI) and the system was re-tested until the passing criteria described above was met.

Details of each drain line tested are summarized in the attached Pressure Test Reports and Hydrostatic Line Testing Forms.

In keeping with WFS's policy, along with AMEC's own internal Health and Safety policies, AMEC's on-site employees participated in a plant safety orientation, the viewing of a safety video, and attended daily safety meetings. Records pertaining to the video and safety orientation are on file at the Milagro Plant.

AMEC Earth & Environmental, Inc.
2060 Afton Place
Farmington, New Mexico, USA
Tel 1+505-327-7928
Fax 1+505-326-5721
www.amec.com

Williams Field Services
Drain Line Testing-Milagro Plant
Phase 1, Task 1
October 24, 2001

AMEC appreciates the opportunity to perform these services at the Milagro Plant for WFS. Should you have any questions, please feel free to contact our office at 327-7928.

Respectfully submitted,

AMEC Earth & Environmental, Inc.

Robert Thompson
Project Manager

Attachments: Daily Summary of Line Testing

Copies: Addressee (3)

Process Safety Management, Mechanical Integrity

PRESSURE TEST REPORT

WORK ORDER NO.	1-517-000064	M.O.C.R. NO.	

FACILITY DESCRIPTION

NAME OF FACILITY:	AREA:	P & ID Number(s) [attach copies]:	Equipment ID Number(s):	Line ID Numbers:
M. Agro	Train # 1, 2, & 3			

EQUIPMENT TYPE:

☐ VESSEL ☐ HOT TAP

☐ PIPE ☐ TANK

☐ OTHER _____

DESCRIPTION OF TEST (e.g., vessel / equipment / line ID description, including system boundaries, insulated or un-insulated, etc.)

3# Hydrostat of Drain Lines

TEST PARAMETERS AND SPECIFICATIONS

TYPE OF TEST: ☑ HYDROSTATIC ☐ LEAK ☑ OPERABILITY

REASON FOR TEST: ☐ NEW ☐ SUITABILITY FOR SERVICE ☐ REPAIR ☐ RE-TEST

MAXIMUM ALLOWABLE WORKING PRESSURE:	MAXIMUM PIPING, EQUIPMENT, OR COMPONENT OPERATING TEMPERTURE, °F:	MINIMUM PIPING, EQUIPMENT OR COMPONENT DESIGN TEMPERTURE, °F:
0 psi	Ambiant	

TEST MEDIUM:	MINIMUM PIPING, EQUIPMENT OR COMPONENT TEMPERTURE, °F:	HIGH POINT MINIMUM PRESSURE, PSIG:	PRELIMINARY LEAK CHECK PRESSURE AT LOW POINT (Minimum 0.50 – maximum 0,80 of required test pressure:	MAXIMUM PRESSURIZATION RATE (0.10 X Required Test Pressure / minute):
water		3 psi		psig / minute
REQUIRED TEST PRESSURE (1.5 X MAWP) PSIG:	REQUIRED TEST DURATION (un-insulated = 1 hour, insulated = 2 hours):	LOW POINT MAXIMUM PRESSURE:		MAXIMUM DEPRESSURIZATION RATE (0.10 X Required Test Pressure / minute): psig / minute

TEST RESULTS

TEST START: DATE:	TIME:	TEST COMPLETED: DATE:	TIME:	WEATHER CONDITIONS:
8-13-01				Cloudy & Cool

COMMENTS:

TEST ACTIVITY LOG
(record the following information each 15 minutes from initial pressurization to de-pressurization)

TIME On	TIME off	DEAD WEIGHT PRESSURE (psig)	CHART RECORDER PRESSURE (psig)	AMBIENT TEMPERATURE (°F)	REMARKS
9:16A	9:50A	3 psi	East End HE		To Stripper Sump Train #1
10:45A	11:15A	3 psi	west End HE		To Stripper Sump Train #1
11:22A	11:52A	3 psi	Stripper Sump		To Main line Valve Train #1
12:00N	12:55P	3 psi	Reflux Acc sump		To Main Line Valve Train #1
1:02P	1:32P	3 psi	East End HE		To Stripper Sump Train #2
1:36P	2:06P	3 psi	west End HE		To Stripper Sump Train #2
2:12P		3 psi Failed Valve Leak	Stripper Sump		To Main Line Valve Train #2
			~~Reflux Acc Sump To Main Line Valve Train #2~~		
2:45P	3:15P	3 psi	Reflux Acc Sump		To Main Line Valve Train #2
			Stripper Sump was Tested with Train #2 main Line System.		

REVIEW AND APPROVALS

WITNESSED BY [Operations]:	DATE:	TEST PERFORMED BY [Contractor and Representative]:	DATE:
WFS	8-13-01	AMEC Bruce Hare	8-13-01
WITNESSED BY [ENGINEERING]:	DATE:	TEST RESULTS REVIEWED AND APPROVED BY [API 510 / 570 / 653 Inspector]:	DATE:

Process Safety Management, Mechanical Integrity

PRESSURE TEST REPORT

WORK ORDER NO.	1-517-000064	M.O.C.R. NO.	

FACILITY DESCRIPTION

NAME OF FACILITY:	AREA:	P & ID Number(s) [attach copies]:	Equipment ID Number(s):	Line ID Numbers:
Milargo	Train 3			

EQUIPMENT TYPE:

☐ VESSEL ☐ HOT TAP

☐ PIPE ☐ TANK

☐ OTHER _____

DESCRIPTION OF TEST (e.g., vessel / equipment / line ID description, including system boundaries, insulated or un-insulated, etc.)

3 psi Hydrostat of Drain Lines

TEST PARAMETERS AND SPECIFICATIONS

TYPE OF TEST: ☑ HYDROSTATIC ☐ LEAK ☑ OPERABILITY

REASON FOR TEST: ☐ NEW ☐ SUITABILITY FOR SERVICE ☐ REPAIR ☐ RE-TEST

MAXIMUM ALLOWABLE WORKING PRESSURE:	MAXIMUM PIPING, EQUIPMENT, OR COMPONENT OPERATING TEMPERTURE, °F:	MINIMUM PIPING, EQUIPMENT OR COMPONENT DESIGN TEMPERTURE, °F:
0 psi	Ambient	

TEST MEDIUM:	MINIMUM PIPING, EQUIPMENT OR COMPONENT TEMPERTURE, °F:	HIGH POINT MINIMUM PRESSURE, PSIG: ,	PRELIMINARY LEAK CHECK PRESSURE AT LOW POINT (Minimum 0.50 – maximum 0,80 of required test pressure:	MAXIMUM PRESSURIZATION RATE (0.10 X Required Test Pressure / minute):
Water		3 psi		psig / minute
REQUIRED TEST PRESSURE (1.5 X MAWP) PSIG:	REQUIRED TEST DURATION (un-insulated = 1 hour, insulated = 2 hours):	LOW POINT MAXIMUM PRESSURE:		MAXIMUM DEPRESSURIZATION RATE (0.10 X Required Test Pressure / minute): psig / minute

TEST RESULTS

TEST START: DATE:	TIME:	TEST COMPLETED: DATE:	TIME:	WEATHER CONDITIONS:
8-14-01				Cloudy & Cool

COMMENTS:

TEST ACTIVITY LOG
(record the following information each 15 minutes from initial pressurization to de-pressurization)

TIME on	TIME off	DEAD WEIGHT PRESSURE (psig)	CHART RECORDER PRESSURE (psig)	AMBIENT TEMPERATURE (°F)	REMARKS
7:55A	8:25A	3 psi	West End HE To Stripper Sump Train 3		
8:40A	9:15	3 psi	East End HE To Stripper Sump TRAIN 3		
3:30P	4:02P	3 PSI	Tested TRAINS 1, 2, 3 & 4 main Lines. Tested Glycos main lines To Burms.		

REVIEW AND APPROVALS

WITNESSED BY [Operations]:	DATE:	TEST PERFORMED BY [Contractor and Representative]:	DATE:
WFS	8-14-01	AMEC Bruce Hare	8-14-01
WITNESSED BY [ENGINEERING]:	DATE:	TEST RESULTS REVIEWED AND APPROVED BY [API 510 / 570 / 653 Inspector]:	DATE:

Process Safety Management, Mechanical Integrity

PRESSURE TEST REPORT

WORK ORDER NO.	1517000064	M.O.C.R. NO.	

FACILITY DESCRIPTION

NAME OF FACILITY:	AREA:	P & ID Number(s) [attach copies]:	Equipment ID Number(s):	Line ID Numbers:
Milargo	TRAIN #5 & other pipe			

EQUIPMENT TYPE:

☐ VESSEL ☐ HOT TAP
☑ PIPE ☐ TANK
☐ OTHER _____

DESCRIPTION OF TEST (e.g., vessel / equipment / line ID description, including system boundaries, insulated or un-insulated, etc.)

Min. 84" w c Hydrostat of Drain Lines

TEST PARAMETERS AND SPECIFICATIONS

TYPE OF TEST: ☑ HYDROSTATIC ☐ LEAK ☑ OPERABILITY

REASON FOR TEST: ☐ NEW ☐ SUITABILITY FOR SERVICE ☐ REPAIR ☑ RE-TEST

MAXIMUM ALLOWABLE WORKING PRESSURE:	MAXIMUM PIPING, EQUIPMENT, OR COMPONENT OPERATING TEMPERTURE, °F:	MINIMUM PIPING, EQUIPMENT OR COMPONENT DESIGN TEMPERTURE, °F:
0 psi		

TEST MEDIUM:	MINIMUM PIPING, EQUIPMENT OR COMPONENT TEMPERTURE, °F:	HIGH POINT MINIMUM PRESSURE, PSIG:	PRELIMINARY LEAK CHECK PRESSURE AT LOW POINT (Minimum 0.50 – maximum 0,80 of required test pressure:	MAXIMUM PRESSURIZATION RATE (0.10 X Required Test Pressure / minute):
water		84" WC		psig / minute
REQUIRED TEST PRESSURE (1.5 X MAWP) PSIG:	REQUIRED TEST DURATION (un-insulated = 1 hour, insulated = 2 hours):	LOW POINT MAXIMUM PRESSURE:		MAXIMUM DEPRESSURIZATION RATE (0.10 X Required Test Pressure / minute):
				psig / minute

TEST RESULTS

TEST START: DATE:	TIME:	TEST COMPLETED: DATE:	TIME:	WEATHER CONDITIONS:
8-16-01		8-16 01		clear & warm

COMMENTS:

TEST ACTIVITY LOG
(record the following information each 15 minutes from initial pressurization to de-pressurization)

TIME	DEAD WEIGHT PRESSURE (psig)	CHART RECORDER PRESSURE (psig)	AMBIENT TEMPERATURE (°F)	REMARKS
ON 0 PS				
10:13A 11:15A	92¼" WC	TRAIN #5	To Block Valve	
1:15P 2:20P	94½" WC	4" Storm Drain		
3:15P 4:15P	102 WC	DRAIN Box	To Block Valve	

REVIEW AND APPROVALS

WITNESSED BY [Operations]:	DATE:	TEST PERFORMED BY [Contractor and Representative]:	DATE:
	8-16-01	AMEC Bruce Hare	8-16-01
WITNESSED BY [ENGINEERING]:	DATE:	TEST RESULTS REVIEWED AND APPROVED BY [API 510 / 570 / 653 Inspector]:	DATE:

Process Safety Management, Mechanical Integrity

PRESSURE TEST REPORT

WORK ORDER NO.	151700006H	M.O.C.R. NO.	

FACILITY DESCRIPTION

NAME OF FACILITY:	AREA:	P & ID Number(s) [attach copies]:	Equipment ID Number(s):	Line ID Numbers:
Milargo	Co Gen Drain and Storm Drain			

EQUIPMENT TYPE:

☐ VESSEL ☐ HOT TAP
☑ PIPE ☐ TANK
☐ OTHER _____

DESCRIPTION OF TEST (e.g., vessel / equipment / line ID description, including system boundaries, insulated or un-insulated, etc.)

Min 84" WC Hydrostat of Drains

TEST PARAMETERS AND SPECIFICATIONS

TYPE OF TEST: ☑ HYDROSTATIC ☐ LEAK ☑ OPERABILITY

REASON FOR TEST: ☐ NEW ☐ SUITABILITY FOR SERVICE ☐ REPAIR ☑ RE-TEST

MAXIMUM ALLOWABLE WORKING PRESSURE:	MAXIMUM PIPING, EQUIPMENT, OR COMPONENT OPERATING TEMPERTURE, °F:	MINIMUM PIPING, EQUIPMENT OR COMPONENT DESIGN TEMPERTURE, °F:
0 psi		

TEST MEDIUM:	MINIMUM PIPING, EQUIPMENT OR COMPONENT TEMPERTURE, °F:	HIGH POINT MINIMUM PRESSURE, PSIG:	PRELIMINARY LEAK CHECK PRESSURE AT LOW POINT (Minimum 0.50 – maximum 0,80 of required test pressure:	MAXIMUM PRESSURIZATION RATE (0.10 X Required Test Pressure / minute):
water				psig / minute
REQUIRED TEST PRESSURE (1.5 X MAWP) PSIG:	REQUIRED TEST DURATION (un-insulated = 1 hour, insulated = 2 hours):	LOW POINT MAXIMUM PRESSURE:		MAXIMUM DEPRESSURIZATION RATE (0.10 X Required Test Pressure / minute): psig / minute

TEST RESULTS

TEST START: DATE:	TIME:	TEST COMPLETED: DATE:	TIME:	WEATHER CONDITIONS:
8-20-01				

COMMENTS:

TEST ACTIVITY LOG
(record the following information each 15 minutes from initial pressurization to de-pressurization)

TIME On	TIME Off	DEAD WEIGHT PRESSURE (psig)	CHART RECORDER PRESSURE (psig)	AMBIENT TEMPERATURE (°F)	REMARKS
10:15A	11:15A	3+psi	102" wc	TOTAL Co Gen	Drain System

REVIEW AND APPROVALS

WITNESSED BY [Operations]:	DATE:	TEST PERFORMED BY [Contractor and Representative]:	DATE:
Jim Hamm MES	8-20-01	AMEC Bruce Hall	8-20-01
WITNESSED BY [ENGINEERING]:	DATE:	TEST RESULTS REVIEWED AND APPROVED BY [API 510 / 570 / 653 Inspector]:	DATE:

OIL CONSERVATION DIV.
01 JUL 27 PM 1:43

Williams

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

July 26, 2001

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

Re: Discharge Plan Fee for WFS Facilities

Dear Sir or Madam:

Enclosed please find check number 1000325548 is $5,700.00 to cover the flat fee for discharge plans on the following sites:

- Milagro Gas Plant GW-060 ($4000.00)
- Cedar Hill CS GW-087($1,700.00)
-

Williams Field Services appreciates your assistance in handling these applications and fees. If you have any questions or require additional information, please contact me at 505/634/4956.

Thank you,

Clara M Garcia
Environmental Compliance

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/24/01

or cash received on _____ in the amount of $ 5,700.00

from Williams Field Services

for Cedar Hill C.S. (Milagro Gas Plant) GW-060 GW-087
(Facility Name) (DP No.)

Submitted by: _____ Date: 7/30/01

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

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

70-2322/719
A/C 9401076

[redacted]

DATE: 07/24/2001

PAY TO THE ORDER OF:

PAY ➔ ******$5,700.00

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

SANTA FE NM 87504
United States

Bank One, NA
Illinois

Authorized Signer

MA1353 (10/99)

COPYRIGHT ANTI-FRAUD PROTECTION - PATENTS 4,210,346; 4,227,720; 4,310,180; 5,197,763; 5,340,158

[redacted]

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
03-JUL-01	20010703	0029620-FCA070107010	DISCHARGE PLAN RENEWAL APPROVAL GW-087	1,700.00
16-JUL-01	20010716	0029620-FCA070107010	DISCHARGE PLAN RENEWAL APPROVAL GW-060	4,000.00

CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
[redacted]	07/24/2001	40665	NEW MEXICO OIL CONSERVATION DI	$5,700.00

MAT3S3(WESAP007) (AP)

AFFIDAVIT OF PUBLICATION

Ad No. 44470

STATE OF NEW MEXICO
County of San Juan:

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

Wednesday, May 16, 2001.

And the cost of the publication is $134.69.

Alethia Rothlisberger

ON 5-29-01 ALETHIA ROTHLISBERGER appeared before me, whom I know personally to be the person who signed the above document.

Jenny Beck

My Commission Expires April 02, 2004

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, Mark J. Barets, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan 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. 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-062) - 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 Manzanares CDP compressor station located in the SE/4 SW/4, Section 28, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of wastewater with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, bermed 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 115 feet with a total dissolved solids concentrations of approximately 910 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-087) - 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 Cedar Hill CDP compressor station located in the SW/4 SW/4, Section 28, Township 32 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of wastewater with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, bermed 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 160 feet with a total dissolved solids concentrations ranging from 200 to 600 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 1st day of May, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

Legal No. 44470, published in The Daily Times, Farmington, New Mexico, Wednesday, May 16, 2001.

Ford, Jack

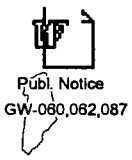
From: Martin, Ed
Sent: Monday, May 14, 2001 9:14 AM
To: 'Farmington Daily Times'
Cc: Ford, Jack
Subject: Legal Notices

Please publish the attached legal notices one time immediately upon receipt of this request.

Upon publication, please send the following to this office:

1. Publisher's affidavit
2. Invoice. Our purchase order number is: **01199000031**

Please publish these notices no later than Friday, May 18, 2001
If you have any questions, please e-mail me or call at (505) 476-3492.
Thank you.



Ford, Jack

From: Martin, Ed
Sent: Monday, May 14, 2001 8:51 AM
To: 'Santa Fe New Mexican'
Cc: Ford, Jack; Olson, William
Subject: Legal Notices

Attn: Betsy Perner

Please publish the attached notices one time only immediately upon receipt of this request.
Upon completion of publication, please send the following to this office:

1. Publisher's affidavit
2. Invoice. Our purchase order number is **01199000033**

Please publish the notice no later than Friday, May 18, 2001.

Thank you.


Publ. Notice GW-326


Publ. Notice GW-245


Publ. Notice GW-198


Publ. Notice GW-078


Publ. Notice GW-060,062,087

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

May 29, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0487

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

RE: Facility Inspections
Rio Arriba and San Juan County, New Mexico

Dear Ms. Garcia:

The New Mexico Oil Conservation Division (OCD) on May 23, 2001, along with Williams Field Service (WFS) personnel Ms. Clara Garcia, Mr. Mark Bareta, Mr. Erick Edmondson, and Mr. Greg Millican inspected the Milagro Gas Plant; on May 24, 2001 the OCD along with Ms. Clara Garcia, Mr. Don Molander, and Mr. Alan Haynes inspected the 29-6 #3 Compressor Station and the Pump Mesa Compressor Station. On May 24, 2001, the OCD along with Williams Field Services personnel Ms. Clara Garcia, Mr. Eric Edmonson, Mr. David Corbett, and Mr. Alan Haynes inspected the Horse Canyon compressor station. The purpose was pre-inspections for renewal of discharge plans for these facilities. The information that follows will address the concerns of the OCD at the above referenced facilities.

Note: For WFS information the OCD has enclosed duplicate copies of photos taken during the inspections.

1. **Milagro Gas Plant, (Inspected 05/23/01)**

   A. The overall housekeeping and pollution prevention in place at the site was generally good to prevent discharges to the ground surface. It should be noted that the used oil and produced oil tanks at the site require some labeling.

   B. The OCD has some concern with piping integrity in the area of the plant which has experienced some ground settling specifically in Trains #1, #2, and #3. Close inspection and observation by Williams Field Service personnel will be necessary to maintain an awareness of conditions in these locations to prevent an accidental unauthorized release.

2. **29-6 #3 Compressor Station,(Inspected 05/24/01)**

   A. General housekeeping at the site is good.

   B. Waste issues - lined and bermed area around the production tank indicates overflow of the tank. Remediation of the hydrocarbon stained gravel and tank is required. Steps should be taken to prevent a reoccurance of this condition.

   C. Production tank requires appropriate label.

3. **Pump Mesa Compressor Station, (Inspected 05/24/01)**

   A. The surface gravel and soils around the base of all compressors has hydrocarbon staining from leaks and spills. Remediation of these areas require immediate attention.

   B. Free standing used engine oil was noted on the concrete base of several compressors. Absorbant pads should be used where applicable and free used oil not be allowed to pool on the concrete foundation pad.

   C. Stained soil was observed around the base of the condensate tank where overflow has occurred. This must be remediated.

   D. A continuous drip appears to be present below the meter box on TK-C11 compressor.

   E. Produced water tank overflow and produced water hose connection catchment requires close observation to eliminate the potential of spilling.

4. **Horse Canyon Compressor Station, (Inspected 05/24/01)**

   A. General housekeeping at the site is good.

   B. Leaks from automatic valves were noted at the evaporator. Catchment vessels need to be placed to prevent spillage onto the ground surface.

   C. Unlabeled drums and barrels require labeling of contents. All empty drums and barrels must be placed horizontal with bungs in place and horizontal alignment.

D. Remediation of spills and overflows around compressor bases is required.

E. On site landfarm of hydrocarbon contaminated soils requires an approval by the OCD. No request for modification of the discharge plan or approval for this activity has been found in the files at the Santa Fe office. Williams Field Services is currently in violation of OCD Rules. A request for modification must be filed with the OCD immediately for review and approval. No additional materials will be added to the landfarming activity until such approval is obtained from the OCD.

The OCD would like to thank the Williams Field Services personnel for their professional conduct during the site visits. If there any questions regarding this report feel free to call me at (505)-476-3489.

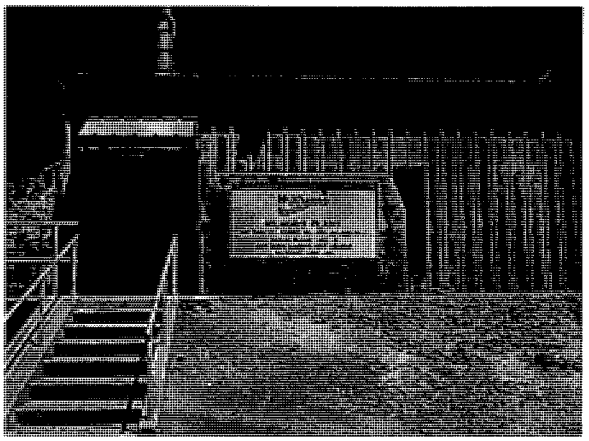
Sincerely,

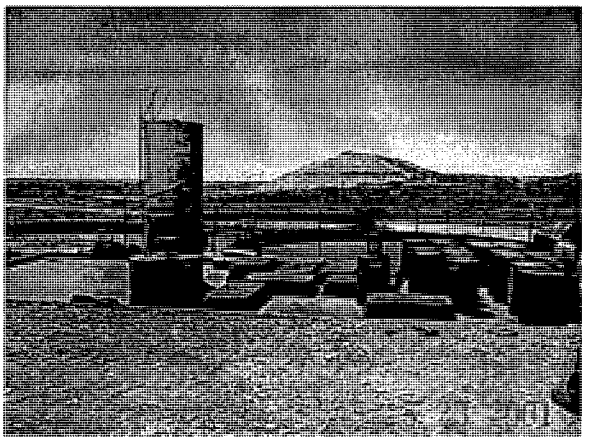
Original Signed

W. Jack Ford, C.P.G.
Water Resource Engineering Specialist
OCD Environment Bureau

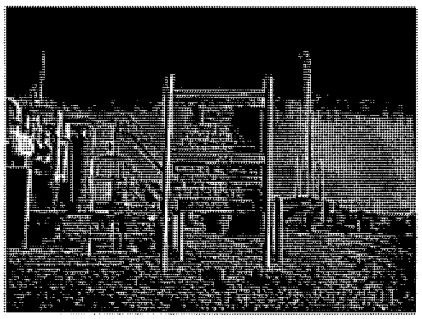
cc: OCD Aztec District Office

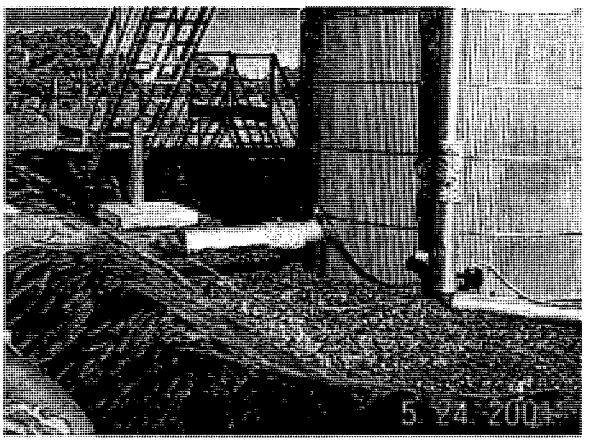
ATTACHMENT NO.1
Milagro Gas Plant

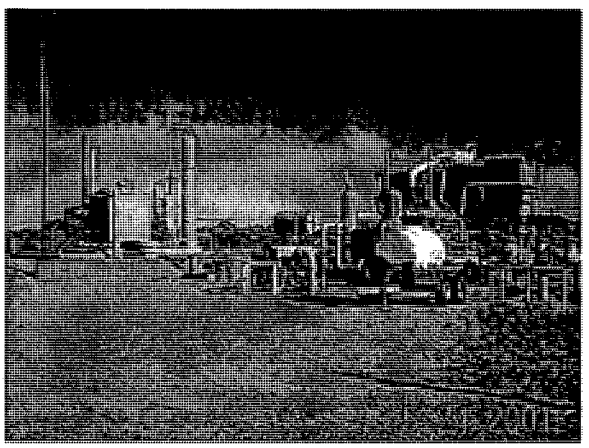




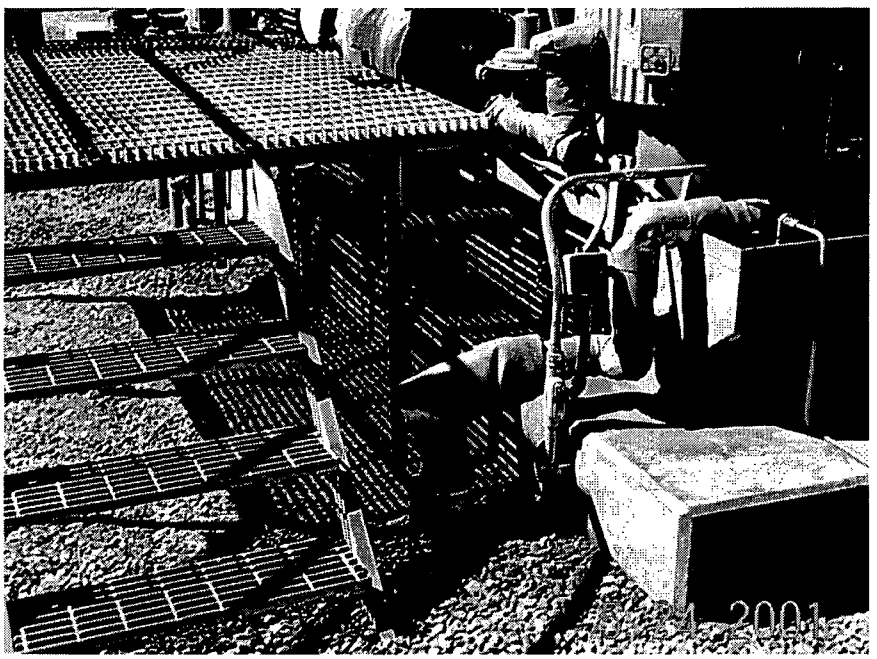
ATTACHMENT NO.2
29-6 #3 Compressor Station



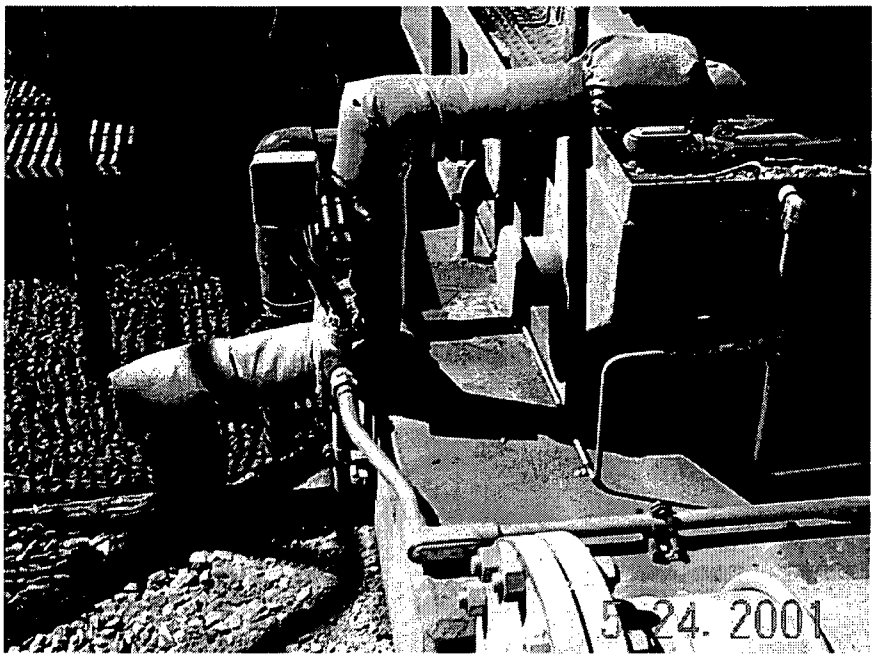


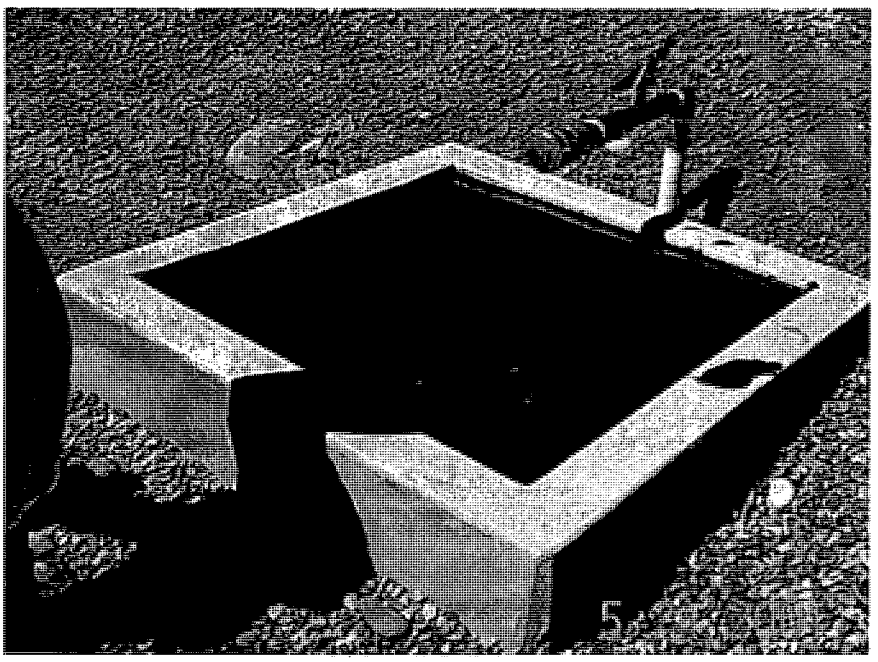


ATTACHMENT NO.3
Pump Mesa Compressor Station

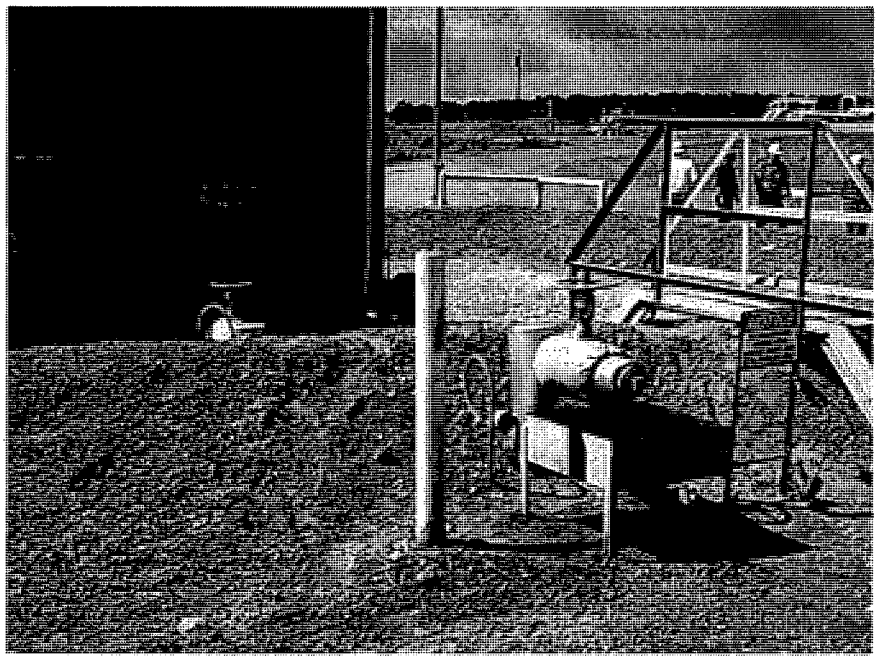


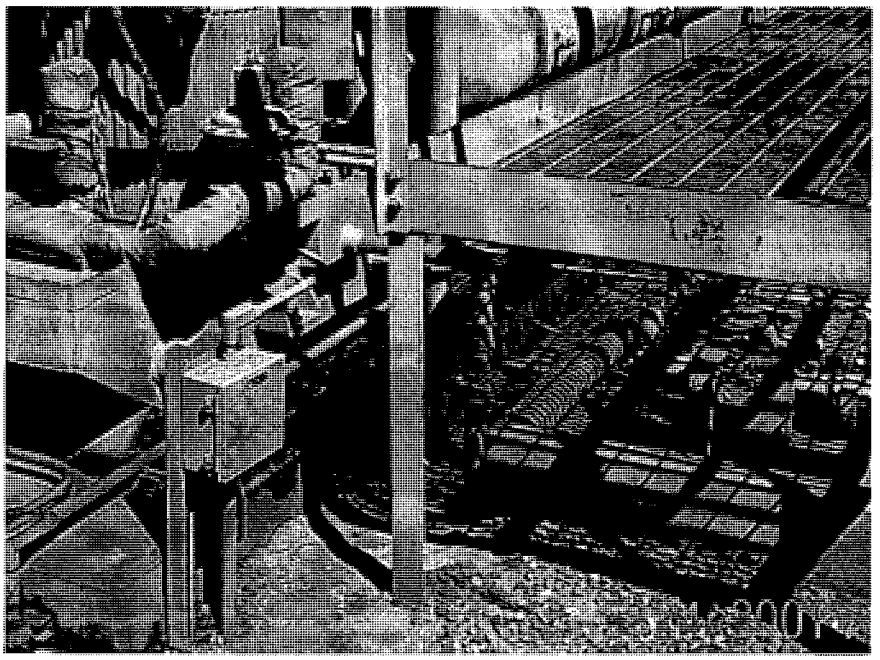
Pump Mesa Compressor Station



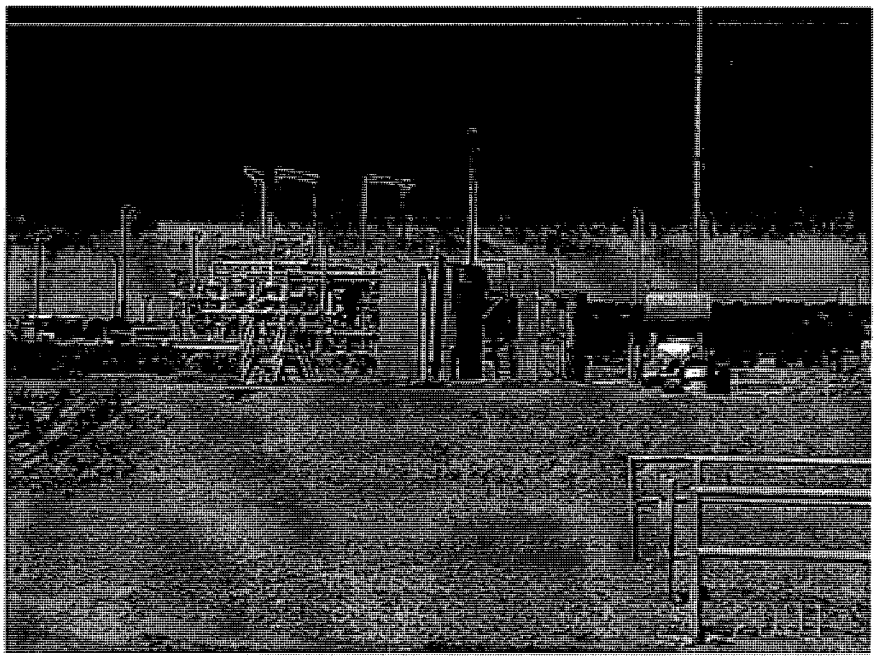


Pump Mesa Compressor Station

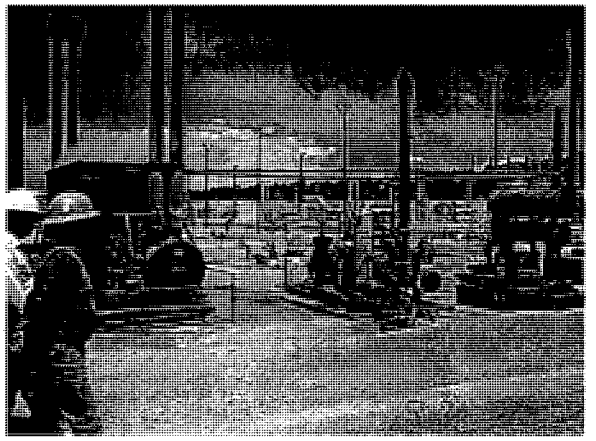


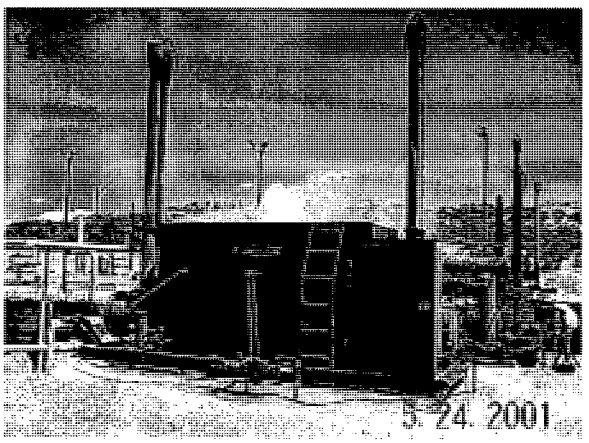


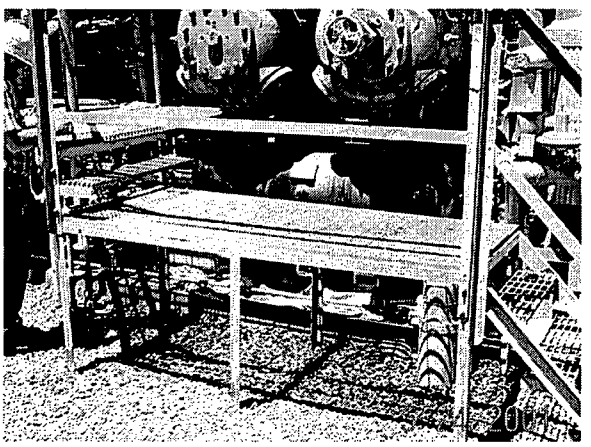
Pump Mesa Compressor Station



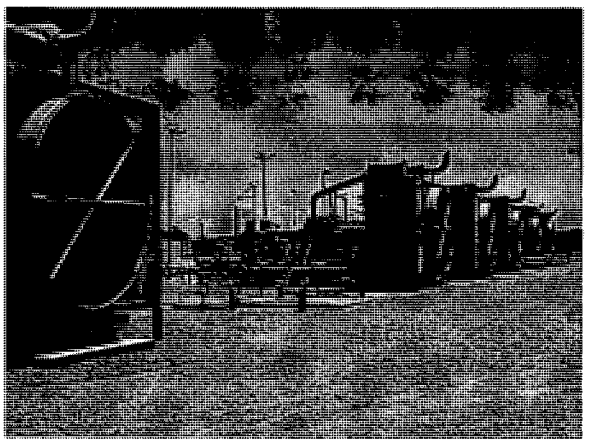
ATTACHMENT NO.4
Horse Canyon Compressor Station

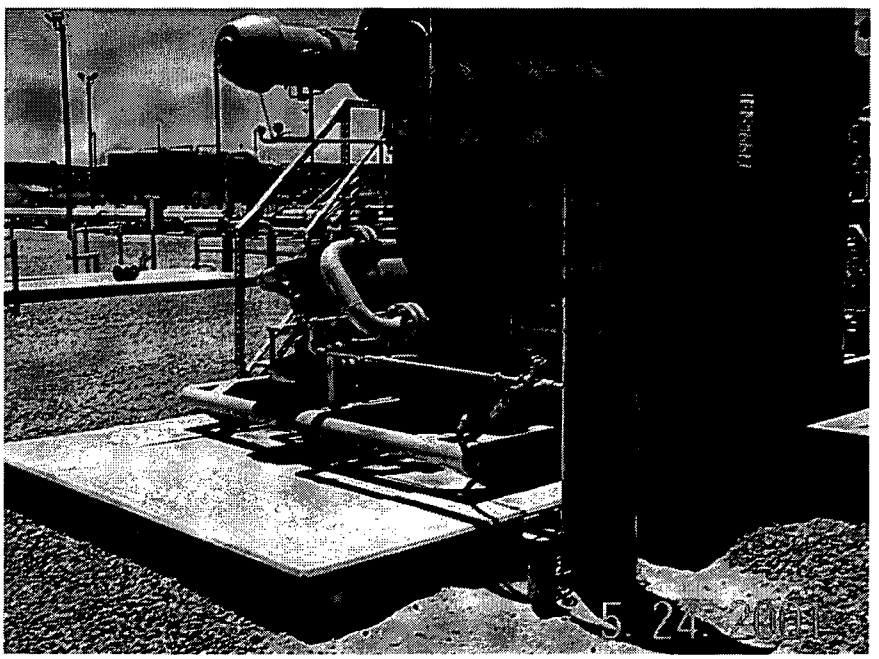




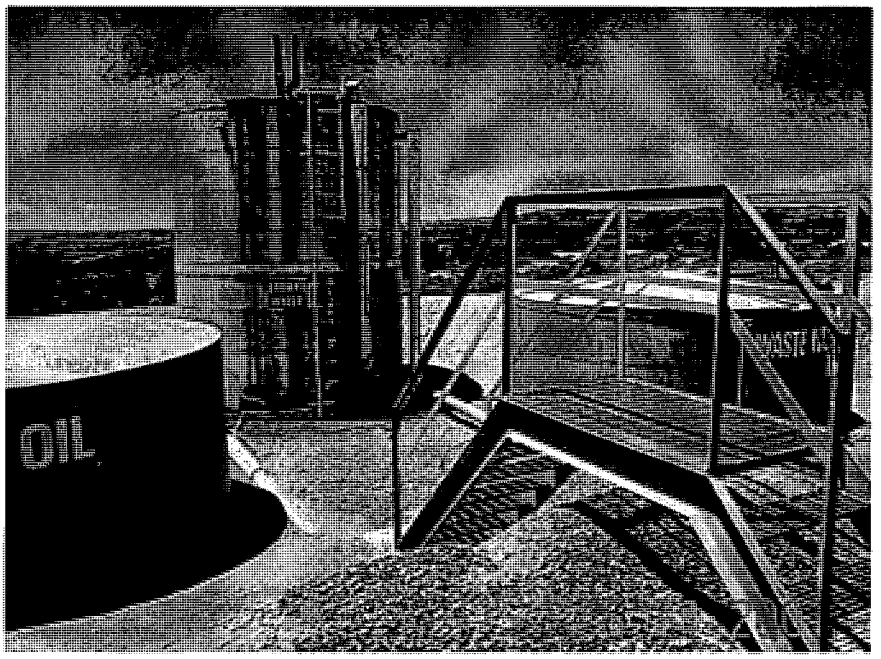


Horse Canyon
Compressor Station





Horse Canyon Compressor Station



THE SANTA FE
NEW MEXICAN
Founded 1849

NEW MEXICO OIL CONSERVATION DIVISION
ATTN: ED MARTIN

AD NUMBER: 206750 ACCOUNT: 56689
LEGAL NO: 69264 P.O.#: 01199000033
305 LINES 1 time(s) at $ 134.45
AFFIDAVITS: 5.25
TAX: 8.73
TOTAL: 148.43

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE
I, MM Weideman 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 #69264 a copy of which is hereto attached was published in said newspaper 1 day(s) between 05/18/2001 and 05/18/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 18 day of May, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ MM Weideman
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
18 day of May A.D., 2001

Notary Laura E. Harding

Commission Expires 11/23/03

RECEIVED
MAY 25 2001
OIL CONSERVATION DIVISION

www.sfnewmexican.com
202 East Marcy Street, Santa Fe, NM 87501-2021 • 505·983·3303 • fax: 505·984·1785 • P.O. Box 2048, Santa Fe, NM 87504-2048

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 (WQCC) Regulations, the following discharge plan modification application(s) has been submitted to the Director of the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-060) - 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 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. 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.

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(GW-087) - 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 Cedar Hill CDP compressor station located in the SW/4 SW/4, Section 28, Township 32 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of wastewater with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, bermed 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 160 feet with a total dissolved solids concentrations ranging from 200 to 600 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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A hearing will be held if the Director determines 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 or disapprove the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1st day of May, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director
Legal #69264
Pub. May 18, 2001

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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(GW-062) - 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 Manzanares CDP compressor station located in the SE/4 SW/4, Section 28, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of wastewater with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, bermed 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 115 feet with a total dissolved solids concentrations of approximately 910 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-087) - 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 Cedar Hill CDP compressor station located in the SW/4 SW/4, Section 28, Township 32 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of wastewater with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, bermed 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 160 feet with a total dissolved solids concentrations ranging from 200 to 600 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 1st day of May, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

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

San Juan GW-060

1. Type: Natural Gas Plant (Milagro Plant)

2. Operator: Williams Field Services Company

   Address: 188 CR 4900, Bloomfield, New Mexico 87413

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

3. Location: W /2 SE/4 Section 12 Township 29North Range 11West
   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. Bareta Title: Senior Environmental Specialist

Signature: Mark J. Bareta Date: 4/26/2001

DISCHARGE PLAN RENEWAL

MILAGRO PLANT
(GW- 60)

Williams Field Services Company

April 2001

Table of Contents

List of Tables

List of Figures - All figures follow Section XI

List of Appendices

I. TYPE OF OPERATION

The Milagro Plant is a natural gas conditioning and cogeneration plant for Williams Field Services (WFS).

II. LEGALLY RESPONSIBLE PARTY

Williams Field Services
188 CR 4900
Bloomfield, NM 87413
(505) 632-4634

Contact Person:
Mark J. Bareta, Senior Environmental Specialist
Phone and Address, Same as Above

III. LOCATION OF FACILITY

The Milagro Plant is located in Section 12, Township 29 North, Range 11 West, in San Juan County, New Mexico, approximately 2.5 miles east of Bloomfield, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangles: Bloomfield, 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 (WFS) owns the subject property.

V. FACILITY DESCRIPTION

This facility, built in 1991, is a natural gas conditioning and cogeneration plant. The conditioning plant is designed to remove carbon dioxide and water from raw natural gas. Plant processes include gas dehydration using triethylene glycol, CO_2 removal by contacting natural gas with sufinol and glycol and sufinol regeneration.

The cogeneration plant generates electricity using natural gas fuel. The exhaust gas heat is used to generate steam for use in the gas conditioning plant. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

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

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

TABLE 1
SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS
MILAGRO PLANT

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Waste Water	Produced water, boiler blowdown, sulfinol pump building, sulfinol reclaimer, and selected process containment drains.	1,000-4,000 gal/day	Water, Amine, Amine Salts, Glycol and Storm water
Used Oil	Turbines and Oil Skimmer	10-50 bbl/month	Used motor oil w/no additives
Used Oil Filters	Turbines	50-100 filters/year	No additives
Laboratory Waste	Laboratory	50-100 gal/month	No additives
Used Oil, Glycol, Amine, Ambitrol, and Water Mixture	Filter drain pad	1-10 bbl/month	Used motor oil, glycol, amine, and ambitrol w/no additives
Used Process Filters	Air, Oil, Inlet, Glycol, Ambitrol and Fuel Gas	1,400-3,000 filters/year	No additives
Empty Drums / Containers	Liquid Containers	200-400/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, certain absorbents, spill residues, 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, laboratory waste, and empty drums. Tables 2a & 2b describe the transfer, storage and disposal of process fluids, effluents, and waste solids expected to be generated at the site.

Non-exempt waste management will be conducted in accordance with NMOCD requirements including the preparation of a Certificate of Waste Status for each non-exempt waste stream. Non-exempt wastes will be analyzed at a minimum for BTEX, TPH, RCRA D-List metals, ignitability, corrosivity, and reactivity to initially determine if such wastes 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 microroentgens 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 and testing of exempt wastes (when required) 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 2a
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
Milagro Plant

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Waste Water	Above Ground Storage Tanks	(3) 5,024 bbl	Berms	Non-exempt	Evaporation is performed at this WFS facility or transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility.
Used Oil	Above Ground Storage Tanks	1,000 gallon 100 bbl	Berms	Non-exempt	May be hauled to a WFS or contactor 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	Consolidated on site, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Laboratory Waste	Drum or other container	Varies	Berms	Non-exempt	Transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Consolidated on site, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Used Oil, Glycol, Ambitrol, and Water Mixture	Above Ground Storage Tanks	(2) 250 bbl	Berms	Non-exempt	Transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	Varies	Berm	Non –exempt	Barrels are returned to supplier or transported to a WFS or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
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	Incident dependent	Consolidated on site, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed for non-exempt waste with the disposal facility. Recycling options may be considered when available.

TABLE 2b
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS
Milagro Plant

PROCESS FLUID/WASTE	STORAGE	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Compressor Oil	Above ground storage tanks	(2) 2,300 gallon	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Diesel	Above ground storage tanks	1,175 gallon 1,250 gallon	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Gasoline/Diesel Mix	Above ground storage tanks	1,000 gallon	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Dielectric Oil	Transformer Casings	(2) 4,233 gallon (2) 456 gallon (4) 233 gallon	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Ambitrol/Water Mix	Above ground storage tanks	100 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Amine/Water Mix	Above ground storage tanks	100 bbl 500 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol	Above ground storage tanks	100 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Triethylene Glycol/Water Mix	Above ground storage tanks	(2) 100 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Amine	Above ground storage tanks	(2) 250 bbl	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Gasoline/Diesel Mix	Above ground storage tanks	500 gallon	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Polymer	Above ground storage tanks	(2) 400 gallons	Berms	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Solvent	Above ground storage tank	300 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Cortrol	Above ground storage tank	400 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

Stearnate	Above ground storage tank	400 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

VIII. STORM WATER PLAN

A Storm Water Pollution Prevention Plan has been prepared for this facility in accordance with federal requirements. A copy will be provided to the NMOCD under separate cover.

IX. INSPECTION, MAINTENANCE AND REPORTING

WFS's personnel will operate and maintain the facility 24 hours per day, 7 days per week, 52 weeks per year. An operator will monitor the facility for equipment malfunctions. Regular inspections will be conducted throughout the facility. The above ground and below-grade tanks will be gauged regularly, and monitored for leak detection.

In the event of a release of a reportable quantity, the operator reports the release to a WFS spill notification service. The service immediately notifies the WFS Environmental Department and all 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. 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 Milagro Plant is located approximately 2.5 miles east of Bloomfield, New Mexico. The site elevation is approximately 5,700 feet above mean sea level. The natural ground surface topography slopes downward toward the west and southwest. The maximum relief over the site is approximately 40 feet. Intermittent flow from the site will follow natural drainage to the south towards Hare Canyon Wash. The nearest down-gradient perennial source of surface water is the San Juan River located approximately 1.9 miles south of the site, at an elevation of approximately 5,530 feet.

A review of the available hydrologic data[1,2,3] for this area revealed that there are no water wells within a 1/4-mile radius of Milagro Plant. The Nacimiento Formation is the water-bearing unit underlying the site. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 40 feet. The total dissolved solids concentration of area ground water is expected to range from 2,800 to 3,200 parts per million.

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

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

References

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

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

[3]Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2001.

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.

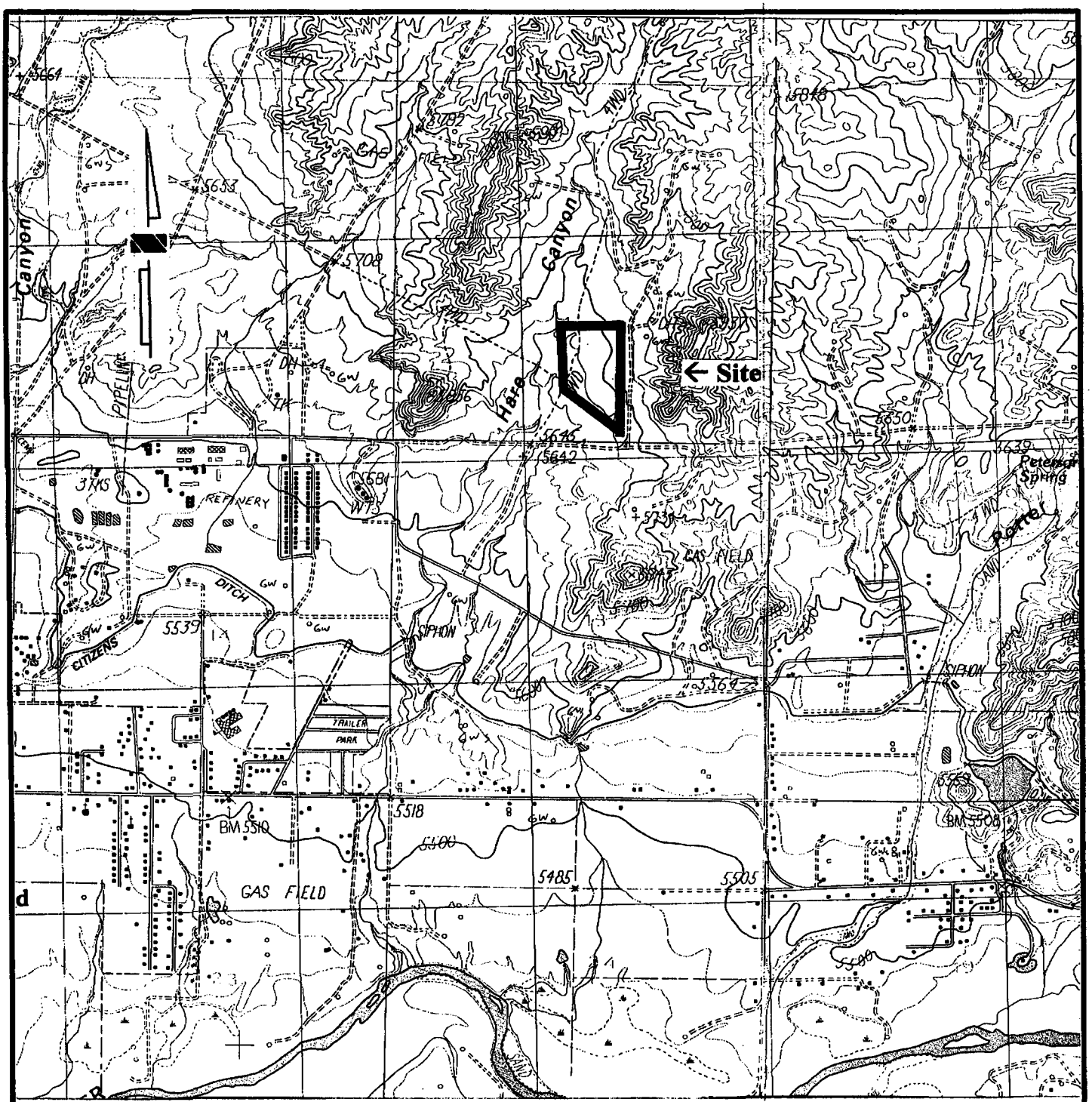
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLAN



Source:USGS Bloomfield Quadrangle, New Mexico

Scale: 1" = 2,000'

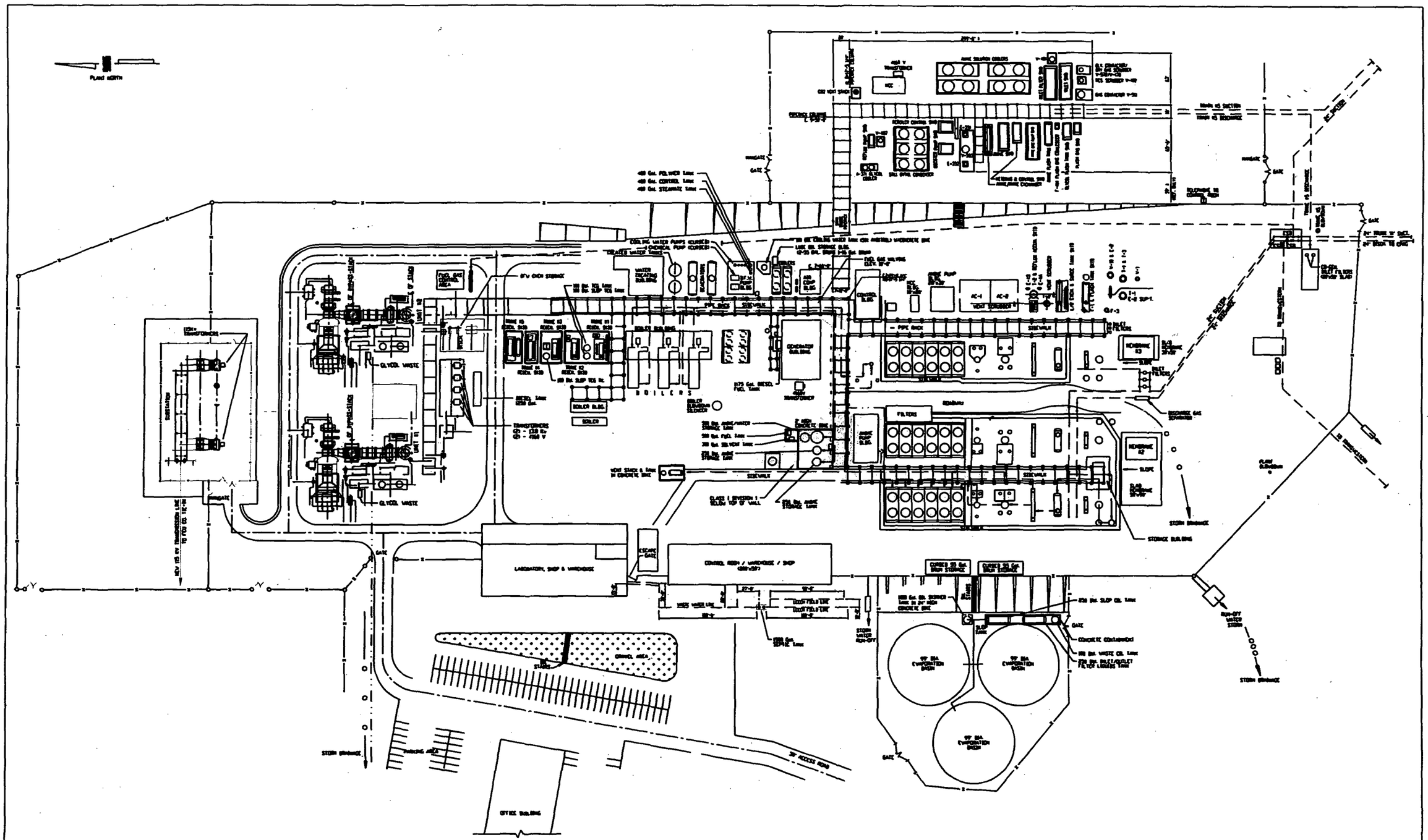
Williams

Figure 1 Site Vicinity / Topographic Map

Milagro Plant

Section 12, Township 29N Range 11W

San Juan County, New Mexico



NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK.	APP.
12	6-11-98	BCS	ROTATED PLAN 180 DEGREES	--		
11	12-26-96	BCS	ADDED WASTE WTR SEPTIC TK LEECH FIELD	--		
10	11-12-96	PNRN	REVISED PER TRANS V ADDIT.	--		

REVISIONS

DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE	DRAWING NO.	TITLE

REFERENCE DRAWINGS

REFERENCE DRAWINGS

DRAFTING	BY	DATE
DRAWN BY	PNRN	9-4-90
CHECKED BY	JG	9-21-90
APPROVED BY	KVB	12-10-90
ENGINEER	**BY**	**DATE**
DESIGNED BY	--	--
PROJ. APPROVED	--	--

STATE: NEW MEXICO
COUNTY: SAN JUAN

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

MILAGRO GAS CONDITIONING PLANT
AREA LAYOUT
PLOT PLAN

SCALE: 1" = 30'
W.O. NO. --
DWG NO. MLG-1-P1
SHEET 1 OF 1
REV 12

APPENDIX A

SPILL CONTROL PROCEDURES

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

▸ **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.

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

a. Berms or retaining walls

b. Curbing

c. Culverting, gutters or other drainage systems

d. Weirs, booms or other barriers

e. Spill diversion ponds or retention ponds

f. Sorbent materials

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.

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? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ 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:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
Date: Phone:	Conditions of Approval:	Attached ☐

* Attach Additional Sheets If Necessary

JUN 2 1 1999

Williams

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

June 15, 1999

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Re: **Request for Modification of WFS Milagro Plant Discharge Plan GW-60**

Dear Mr. Ford:

This letter serves as a Request for Modification to the Williams Field Services (WFS) Milagro Plant Discharge Plan (GW-60) to construct a landfarm at the facility.

Landfarm Construction

Williams Field Services (WFS) plans to construct a landfarm in order to remediate soils impacted by release of non-hazardous and RCRA exempt spill materials from various plant operations. The landfarm will be constructed north of the facility, where WFS owns approximately 5 acres of land (see drawing), in an area approximately 50 feet by 100 feet in size. Due to the available space, a 100 yard buffer zone can easily be maintained to prevent fugitive dust from leaving WFS property. The volume of soil managed in the landfarm will be determined by the frequency and magnitude of future releases, as well as contaminant degradation rates. The landfarm will be bermed and fenced.

Landfarm Operation

It is anticipated that soils in the landfarm will be spread in 6 to 12-inch lifts or as space allows. The soils will be disked regularly, and nutrients and/or moisture may be applied periodically to enhance biodegradation of contaminants. Dust suppression measures will be implemented as contitions warrant. Soils will be analyzed per OCD Guidelines for Remediation prior to re-use on the facility.

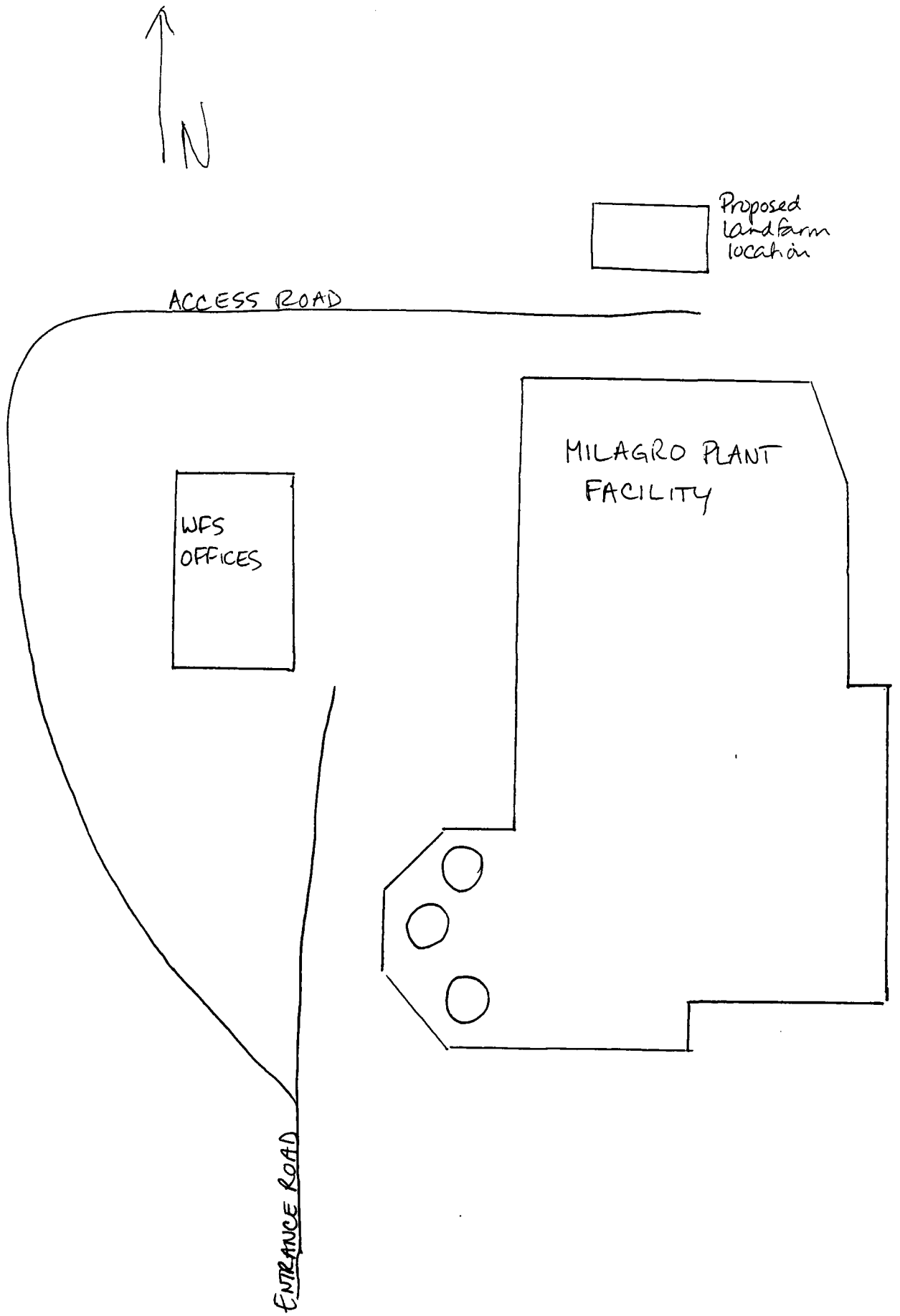
If you have any questions, I can be reached at 801-584-6543. Your assistance in handling these matters is appreciated.

Best regards,

Ingrid A. Deklau
Environmental Specialist

Xc: Denny Foust, Aztec OCD

June 15, 1999
WFS Request for Modification of WFS Milagro Plant GW-60



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

February 9, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0074

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

RE: Discharge Plan Renewal Notice for Williams Field Services Facilities

Dear Ms. Garcia:

Williams Field Services has the following discharge plans, which expire during the current calendar year.

GW-060	**expires**	**3/21/2001 – Milagro Compressor Station**
GW-233	**expires**	**4/1/2001 – La Jara Compressor Station**
GW-061	**expires**	**6/6/2001 – Horse Canyon Compressor Station**
GW-062	**expires**	**6/6/2001 – Manzanares Compressor Station**
GW-063	**expires**	**6/6/2001 – Pump Mesa Compressor Station**
GW-064	**expires**	**6/6/2001 – Middle Mesa Compressor Station**
GW-079	**expires**	**6/21/2001 – Wild Horse Compressor Station**
GW-078	**expires**	**6/21/2001 - 5-Points Compressor Station**
GW-250	**expires**	**8/9/2001 – Coyote Springs Compressor Station**
GW-249	**expires**	**8/9/2001 – Trunk B Booster Compressor Station**
GW-248	**expires**	**8/9/2001 – Trunk A Booster Compressor Station**
GW-257	**expires**	**9/18/2001 – Trunk C Compressor Station**
GW-256	**expires**	**9/18/2001 – Koch-Gardner Compressor Station**
GW-087	**expires**	**11/27/2001 – Cedar Hill Compressor Station**
GW-271	**expires**	**12/17/2001 – Kernaghan Compressor Station**
GW-274	**expires**	**12/17/2001 – Pritchard Straddle Compressor Station**
GW-273	**expires**	**12/17/2001 – Moore Compressor Station**
GW-272	**expires**	**12/17/2001 – Kernaghan B-8 Compressor Station**

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued

under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 20NMAC 6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $100.00. After January 15, 2001 renewal discharge plans require a flat fee equal to the flat fee schedule for gas processing facilities pursuant to revised WQCC Regulations 20NMAC 6.2.3114. A copy of the revised fee schedule is included for your assistance. The $100.00 filing fee is to be submitted with each discharge plan renewal application and is nonrefundable.

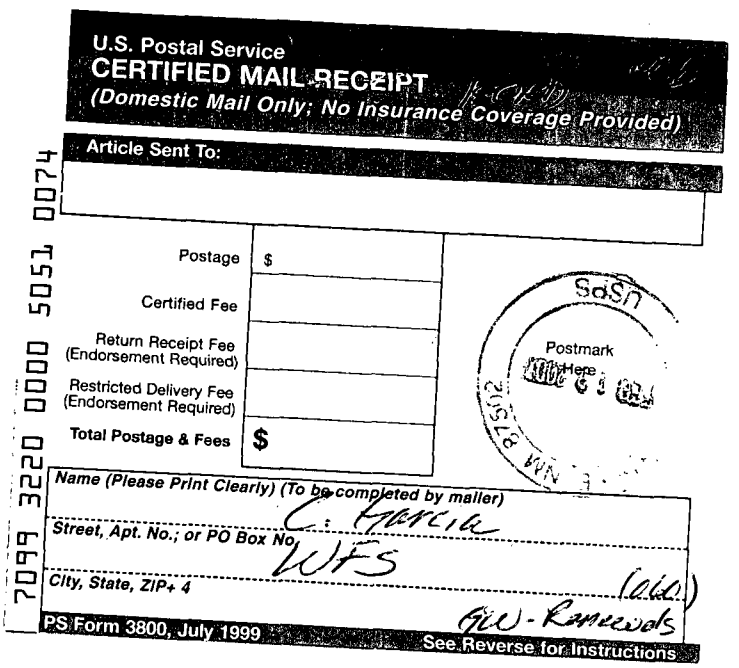
Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A complete copy of the regulations is also available on NMED's website at **www.nmenv.state.nm.us**).

If any of the above-sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services has any questions, please do not hesitate to contact Mr. Jack Ford at (505) 476-3489.

Sincerely,

Roger C. Anderson
Oil Conservation Division

cc: OCD Aztec District Office


U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
Article Sent To:
Postage $
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees $
Postmark Here
7099 3220 0000 5051 0074
Name (Please Print Clearly) (To be completed by mailer)
C. Garcia
Street, Apt. No.; or PO Box No. WFS
City, State, ZIP+ 4 (660)
GW - Renewals
PS Form 3800, July 1999
See Reverse for Instructions

Williams

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

April 18, 2000

Mr. Wayne Price
NM OCD
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: WFS Milagro Plant OCD Discharge Plan Update (GW-60)

Dear Mr. Price:

The purpose of this letter is to notify you of additional tank capacity planned for installation at this site.

North of the amine pump building on Train 2 there is a concrete containment berm with 3 tanks: 1 amine tank, 1 amine/water mix tank, and one CS Plus Solvent additive tank. The plan is to convert the current additive tank to additional capacity for amine/water mix, and to install a new CS Plus Solvent tank within the existing concrete berm. The size of the new tank is expected to be approximately 100 bbl. The berm does have containment capacity exceeding 133% of the capacity of the largest tank in the berm.

Please see the attached diagram, and use this information to update our OCD Discharge Plan accordingly. I can be reached at 801-584-6543 if you have any additional questions.

Thank you in advance for your assistance,

Ingrid Deklau
Environmental Specialist

Xc: Denny Foust, Aztec OCD

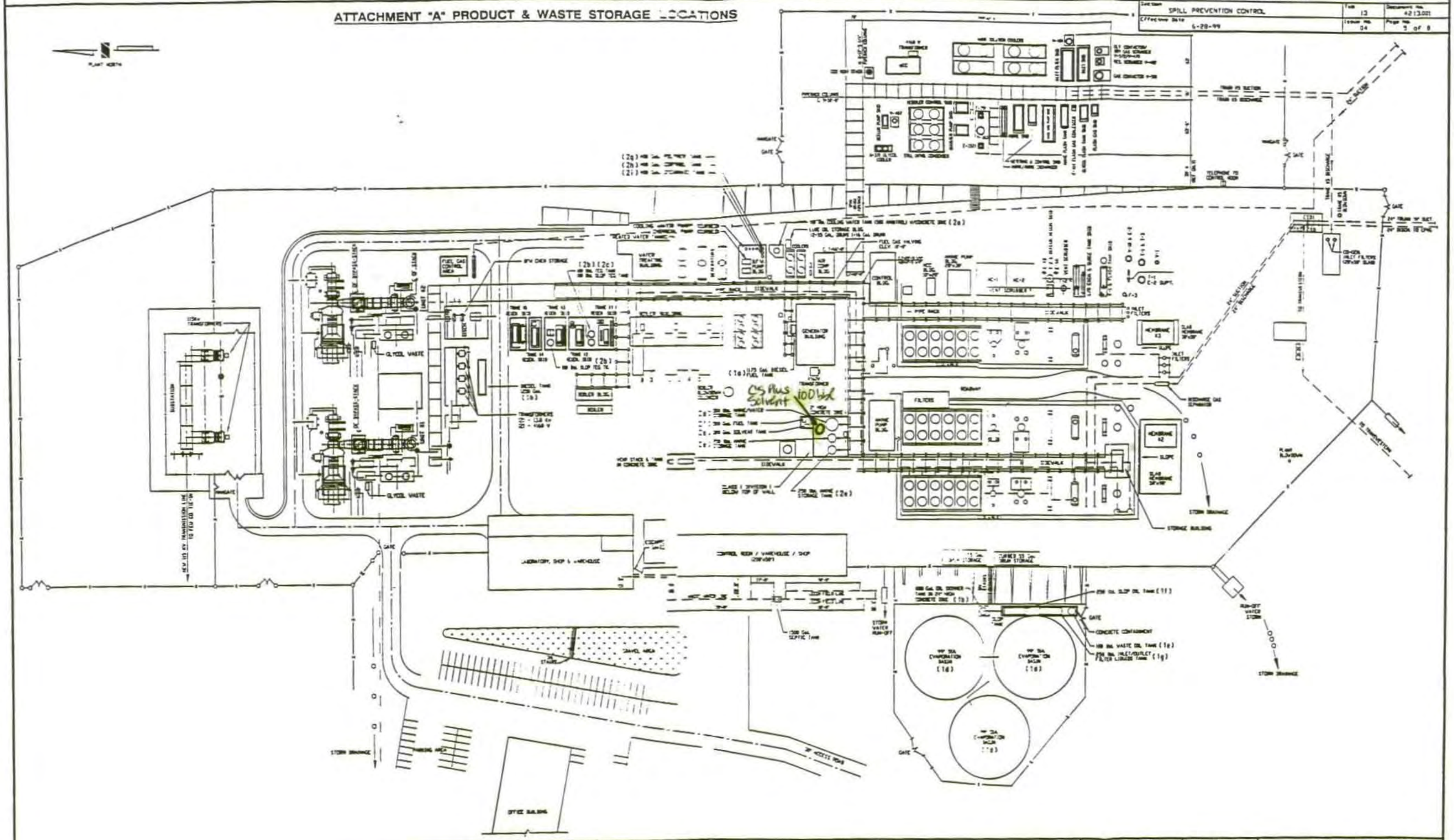
T:\Ds\PM_EI\Drawings_Work-in-Progress\San_Juan\Milagro_(MLG)\EOD\MLG-01-P00229-S01-R04.dwg

Subject or Title

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS

OPERATIONS		
Manual MILAGRO GAS CONDITIONING PLANT		
Section SPILL PREVENTION CONTROL	Tab 13	Document No. 4213.001
Effective Date 6-28-99	Issue No. 04	Page No. 3 of 8



CS Plus Solvent 100 bbl

04	6-28-99		REVISED PER FIELD AS-BUILT	98408	
03	6-4-98	BCS	COS DWG REDRAWN ON 24x36 FORMAT	—	
NO.	DATE	BY	DESCRIPTION	W.O.NO.	CHK APP

REVISIONS

REFERENCE DRAWINGS

REFERENCE DRAWINGS

DRAFTING	BY	DATE
DRAWN BY	BCS	6-4-98
CHECKED BY	—	
APPROVED BY		
ENGINEER	**BY**	**DATE**
DESIGNED BY		
PROJ. APPROVED		

STATE: NEW MEXICO
COUNTY: SAN JUAN

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

MILAGRO GAS CONDITIONING PLANT
SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN
PLOT PLAN

SCALE: 1" = 50'
W.O. NO. 98408
DWG NO. MLG-1-P229
REV 04

Wayne Price → Discharge Plan File

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 South First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

State of New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C-14
Originated 2/13/9

Submit 2 copies t
Appropriate Distri
Office in accordan
with Rule 116 c
back side of for

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Repo

Name	Contact
Williams Field Services	Ingrid Deklau
Address	**Telephone No.**
295 Chipeta Way SLC UT 84108	801-584-6543
Facility Name	**Facility Type**
Milagro Plant	Natural Gas Plant

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
	12	29N	11W					San Juan

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Waste water and Septic Water	~9540 gal	0
Source of Release	**Date and Hour of Occurrence**	**Date and Hour of Discovery**
Breach in septic line and closed drain line	1/25/99 - 2/22/99	same
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	**If YES, To Whom?** Frank Chavez, OCD	
By Whom? Ingrid Deklau	**Date and Hour** 2/23/99 2:30 pm	
Was a Watercourse Reached? ☐ Yes ☒ No	**If YES, Volume Impacting the Watercourse.**	

RECEIVED
MAR 2 3 1999
Environmental Bureau
Oil Conservation Division

If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If Necessary)
N/a

Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary)
see attached description and diagrams

RECEIVED
MAR - 8 1999
OIL CON. DIV.
DIST. 3

Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)
see attached

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 operato 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 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: [signature]	OIL CONSERVATION DIVISION
Printed Name: Ingrid Deklau	Approved by District Supervisor: Denny G. Foust for Frank Chavez
Title: Envt'l Specialist	Approval Date: 3/16/99 Expiration Date:
Date: 3/4/99 Phone: 801-584-6543	Conditions of Approval: Reverts to discharge plan. Attached ☐

Attachment to Spill Report
WFS Milagro Plant, 2/22/99 release

Overview of Problem

In late January 1999, WFS employees began to realize significant settling of the Milagro Plant office building. Sub-surface water (i.e., spring, leaking water pipe) was immediately suspected since there had not been any abnormal amount of precipitation in the proceeding months. Simultaneously, water was observed running out a junction box about 300 feet west of the Milagro Plant office building. A series of tests run over the course of several weeks by plant personnel indicated that the junction box under the Milagro Plant building provided the conduit to the junction box 300 feet west of the building; and the water discharged contained a mix of septic and waste water. Waste water is likely to contain boiler blowdown, wash-down water, and trace quantities of amine, glycol, and lube oil. Integrity tests conducted on the water lines, sewage lines, and closed drain lines lead to the discovery of a failed dressser coupling on the shop floor drain; a restriction in the process drain system to the waste water system; and a vertical shear in the sewer line. It is not known which line broke first. It is assumed that building settling contributed to the magnitude of the problem.

Remedial Action Taken

The flow at the junction box was first observed on 1/25/99. At that time, facility personnel began conducting tests to determine the source of the water. Initially, plant personnel suspected an underground spring or a broken water line. Results of the water line test indicated no problem. The sewer lines were tested next. Upon discovery of the break in the sewer line on 2/5/99, immediate action involved taking the sewer and water system out of service until appropriate repairs could be made. Repairs were completed by 2/8/99. The systems were put back into service, and flow at the junction box ceased.

On 2/16/99 a trace of water was observed flowing again at the junction box, and by 2/18/99 there was a steady flow of water. Plant personnel assumed the sewer line was breached again, and on 2/19/99 a hole was dug below the stem wall on the west face of the office building to expose the sewer line and make appropriate repairs. The hole created a release point for water that had accumulated beneath the building. At this time, it was still assumed that the source of this water was the sewer system.

On 2/19/99, water was again discovered to be flowing from the junction box, and on 2/20-21/99, a surge in flow was observed. The surge in the flow rate occurred as equipment was being washed down at the plant. A pressure test conducted on 2/22/99 confirmed the suspicion that the closed drain system was also leaking. A failed dresser coupling was discovered on the east side of the office building. With this discovery, all water was shut off on 2/22/99, and the release was reported to WFS Environmental Affairs. On 2/23/99 the release was reported to the Aztec office of the OCD.

Area Affected

Over the course of the first discharge, the soils in the vicinity of the junction box were saturated. A small plume of water flowed towards a shallow, narrow, man-made

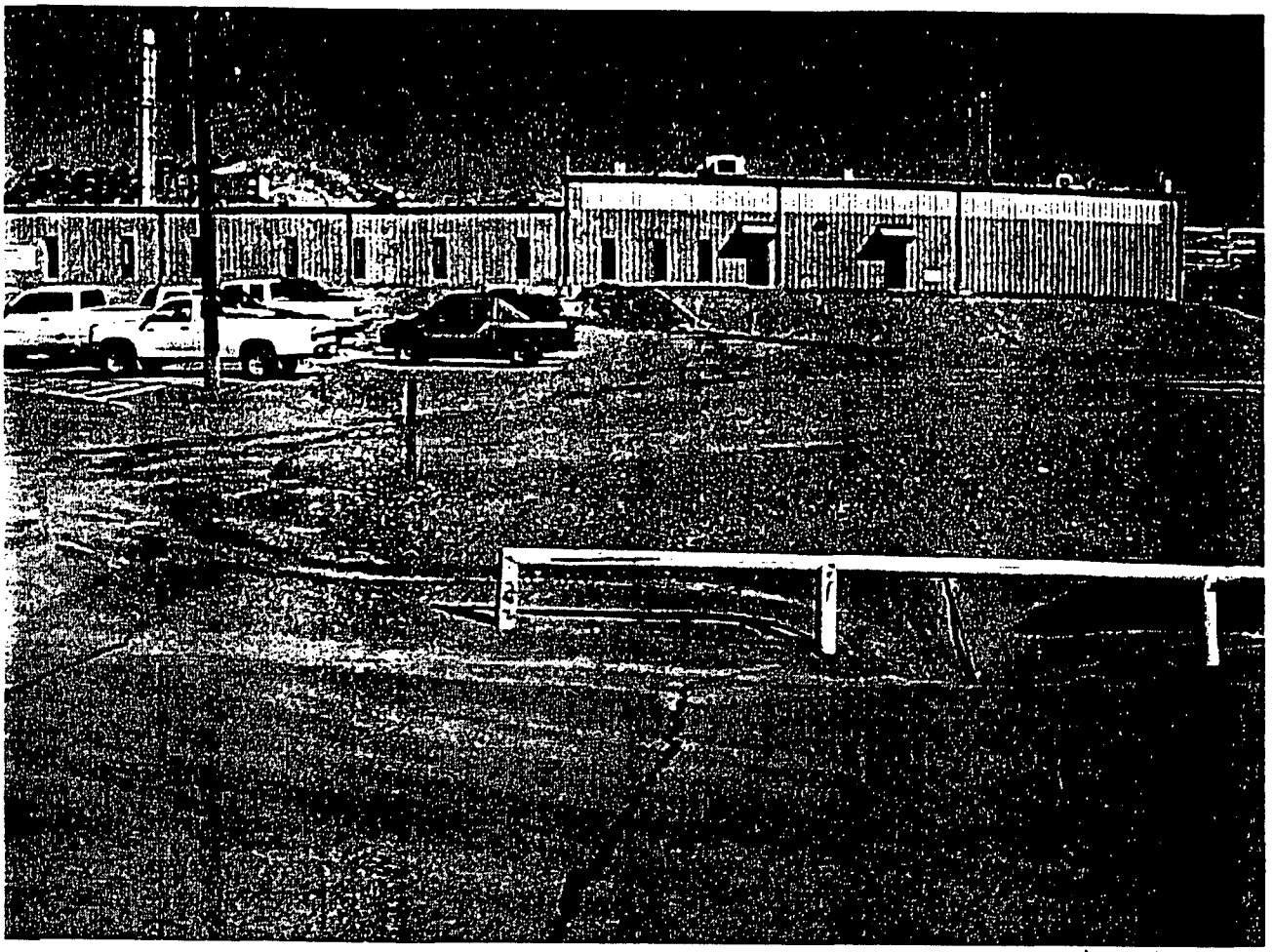
drainage that directs water from the parking lot west of the office building, under the entrance road, past the junction box and into the large, open grassy field south and west of the junction box (see attached diagram). Flow measurements recorded over the course of the discharge indicate that approximately 4140 gallons of water may have been released in the area of the junction box. It is not possible to determine what percent of the discharge was septic or waste water related.

Water discharged during the second release event flowed westward from the office building, across the parking lot, and into the man-made drainage that goes under the entrance road and past the junction box. Flow rates measured from 2/19/99 until the water was shut off on 2/22/99 indicate that approximately 5400 gallons of water may have been released in this event. Again, it is not possible to determine what percent of the discharge was septic or waste water related.

The total area impacted is estimated to be about 4000 square feet, or approximately 0.1 acre. All water discharged remained on-site. There was no off-site discharge related to this sequence of events.

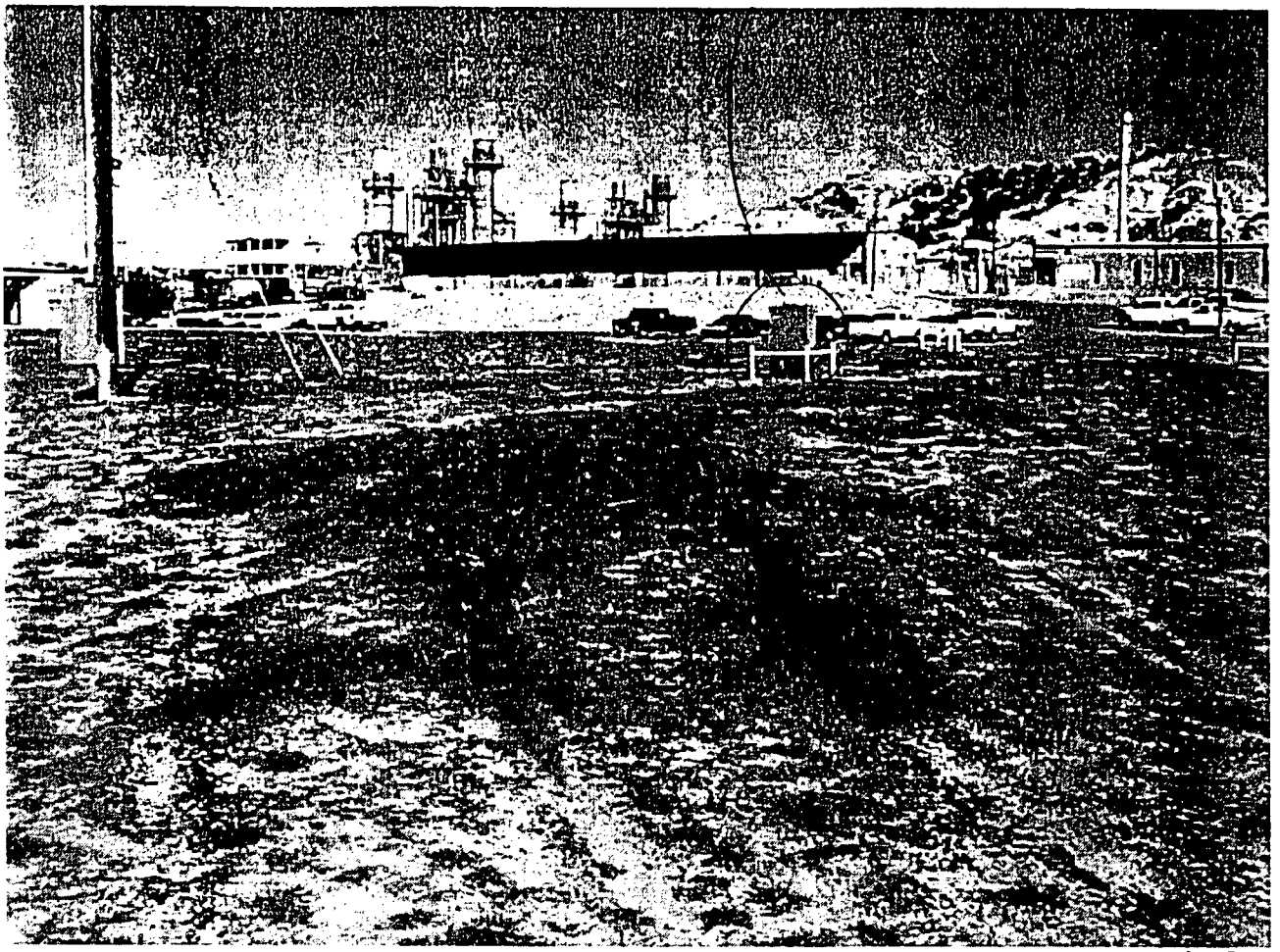
Cleanup Action Taken

On 2/27/99 soil samples were taken in both affected areas. Analytical results are expected within the next 10 working days, and a report will be provided to the OCD at that time. Stained soils removed from the affected areas on 2/2799 will either be landfarmed, or disposed at an OCD-approved facility. The need for additional cleanup will be determined based on analytical results received.



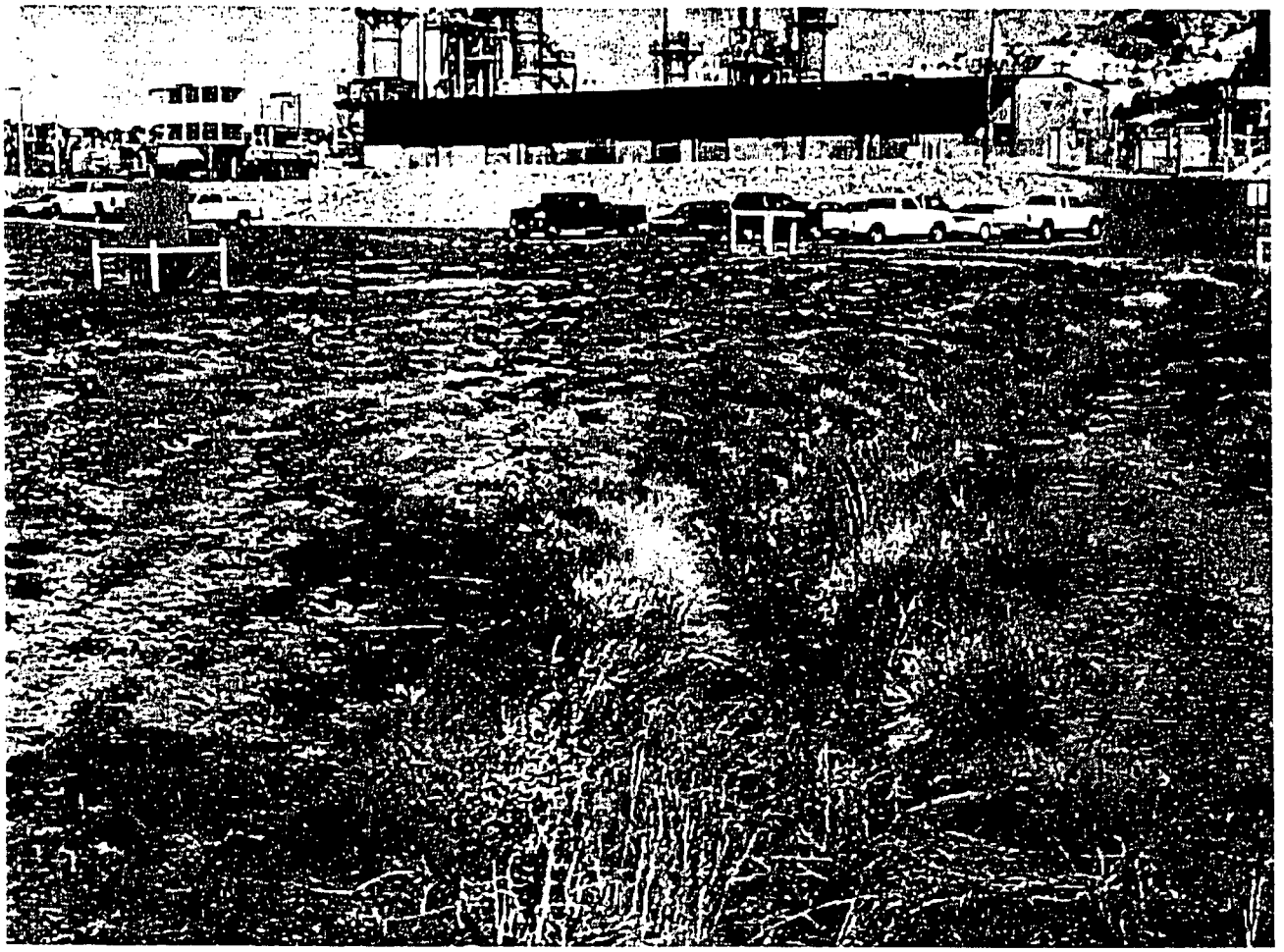
2/24/99

PHOTO 1
From west side of entrance road, where parking lot drainage goes under the road



2/24/99

PHOTO 2
Area of saturated soil west of junction box



2/24/99

PHOTO 3
Man-made drainage from parking lot into grassy field west of entrance road

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 South First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

State of New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C- 14
Originated 2/13/

Submit 2 copies
Appropriate Dist
Office in accorda
with Rule 116
back side of fo

Release Notification and Corrective Action
OPERATOR

☐ Initial Report ☐ Final Rep

Name	Contact
Williams Field Services	Ingrid Deklau
Address	**Telephone No.**
295 Chipeta Way SLC UT 84108	801-584-6543
Facility Name	**Facility Type**
Milagro Plant	Natural Gas Plant

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
	12	29N	11W				San Juan

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Waste water and Septic Water	~9540 gal	0
Source of Release	**Date and Hour of Occurrence**	**Date and Hour of Discovery**
Breach in septic line and closed drain line	1/25/99 - 2/22/99	same
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	**If YES, To Whom?**	Frank Chavez, OCD
By Whom?	**Date and Hour**	
Ingrid Deklau	2/23/99 2:30 pm	
Was a Watercourse Reached? ☐ Yes ☒ No	**If YES, Volume Impacting the Watercourse.**	

If a Watercourse was Impacted, Describe Fully. (Attach Additional Sheets If Necessary)

N/a

Describe Cause of Problem and Remedial Action Taken. (Attach Additional Sheets If Necessary)

see attached description and diagrams

Describe Area Affected and Cleanup Action Taken. (Attach Additional Sheets If Necessary)

see attached

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 oper 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 acceptan 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: Ingrid Deklau	**OIL CONSERVATION DIVISION**
Printed Name: Ingrid Deklau	Approved by District Supervisor:
Title: Envt'l Specialist	Approval Date: / Expiration Date:
Date: 3/4/99 Phone: 801-584-6543	Conditions of Approval: / Attached ☐

Attachment to Spill Report
WFS Milagro Plant, 2/22/99 release

Overview of Problem

In late January 1999, WFS employees began to realize significant settling of the Milagro Plant office building. Sub-surface water (i.e., spring, leaking water pipe) was immediately suspected since there had not been any abnormal amount of precipitation in the proceeding months. Simultaneously, water was observed running out a junction box about 300 feet west of the Milagro Plant office building. A series of tests run over the course of several weeks by plant personnel indicated that the junction box under the Milagro Plant building provided the conduit to the junction box 300 feet west of the building; and the water discharged contained a mix of septic and waste water. Waste water is likely to contain boiler blowdown, wash-down water, and trace quantities of amine, glycol, and lube oil. Integrity tests conducted on the water lines, sewage lines, and closed drain lines lead to the discovery of a failed dressser coupling on the shop floor drain; a restriction in the process drain system to the waste water system; and a vertical shear in the sewer line. It is not known which line broke first. It is assumed that building settling contributed to the magnitude of the problem.

Remedial Action Taken

The flow at the junction box was first observed on 1/25/99. At that time, facility personnel began conducting tests to determine the source of the water. Initially, plant personnel suspected an underground spring or a broken water line. Results of the water line test indicated no problem. The sewer lines were tested next. Upon discovery of the break in the sewer line on 2/5/99, immediate action involved taking the sewer and water system out of service until appropriate repairs could be made. Repairs were completed by 2/8/99. The systems were put back into service, and flow at the junction box ceased.

On 2/16/99 a trace of water was observed flowing again at the junction box, and by 2/18/99 there was a steady flow of water. Plant personnel assumed the sewer line was breached again, and on 2/19/99 a hole was dug below the stem wall on the west face of the office building to expose the sewer line and make appropriate repairs. The hole created a release point for water that had accumulated beneath the building. At this time, it was still assumed that the source of this water was the sewer system.

On 2/19/99, water was again discovered to be flowing from the junction box, and on 2/20-21/99, a surge in flow was observed. The surge in the flow rate occurred as equipment was being washed down at the plant. A pressure test conducted on 2/22/99 confirmed the suspicion that the closed drain system was also leaking. A failed dresser coupling was discovered on the east side of the office building. With this discovery, all water was shut off on 2/22/99, and the release was reported to WFS Environmental Affairs. On 2/23/99 the release was reported to the Aztec office of the OCD.

Area Affected

Over the course of the first discharge, the soils in the vicinity of the junction box were saturated. A small plume of water flowed towards a shallow, narrow, man-made

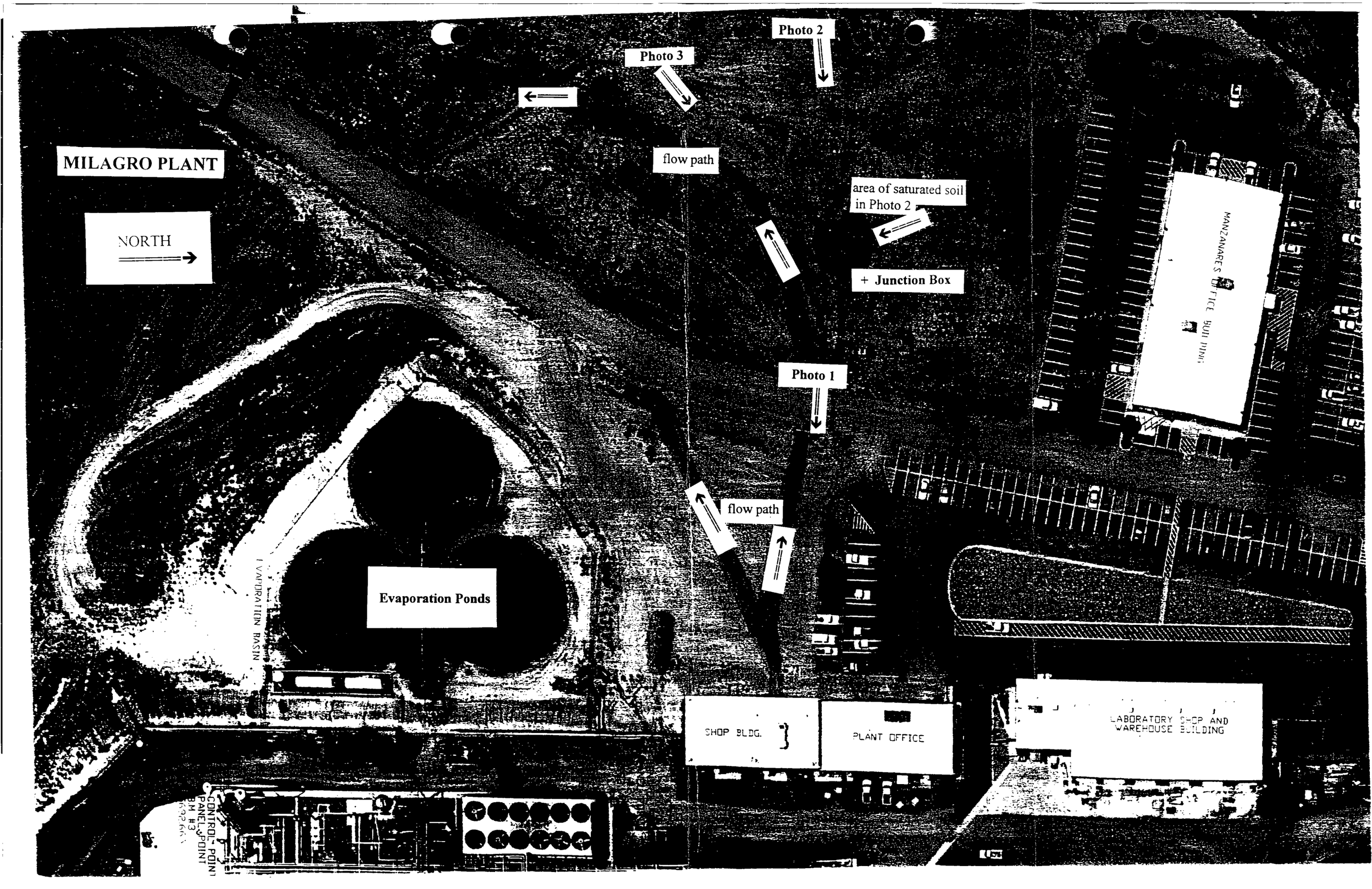
drainage that directs water from the parking lot west of the office building, under the entrance road, past the junction box and into the large, open grassy field south and west of the junction box (see attached diagram). Flow measurements recorded over the course of the discharge indicate that approximately 4140 gallons of water may have been released in the area of the junction box. It is not possible to determine what percent of the discharge was septic or waste water related.

Water discharged during the second release event flowed westward from the office building, across the parking lot, and into the man-made drainage that goes under the entrance road and past the junction box. Flow rates measured from 2/19/99 until the water was shut off on 2/22/99 indicate that approximately 5400 gallons of water may have been released in this event. Again, it is not possible to determine what percent of the discharge was septic or waste water related.

The total area impacted is estimated to be about 4000 square feet, or approximately 0.1 acre. All water discharged remained on-site. There was no off-site discharge related to this sequence of events.

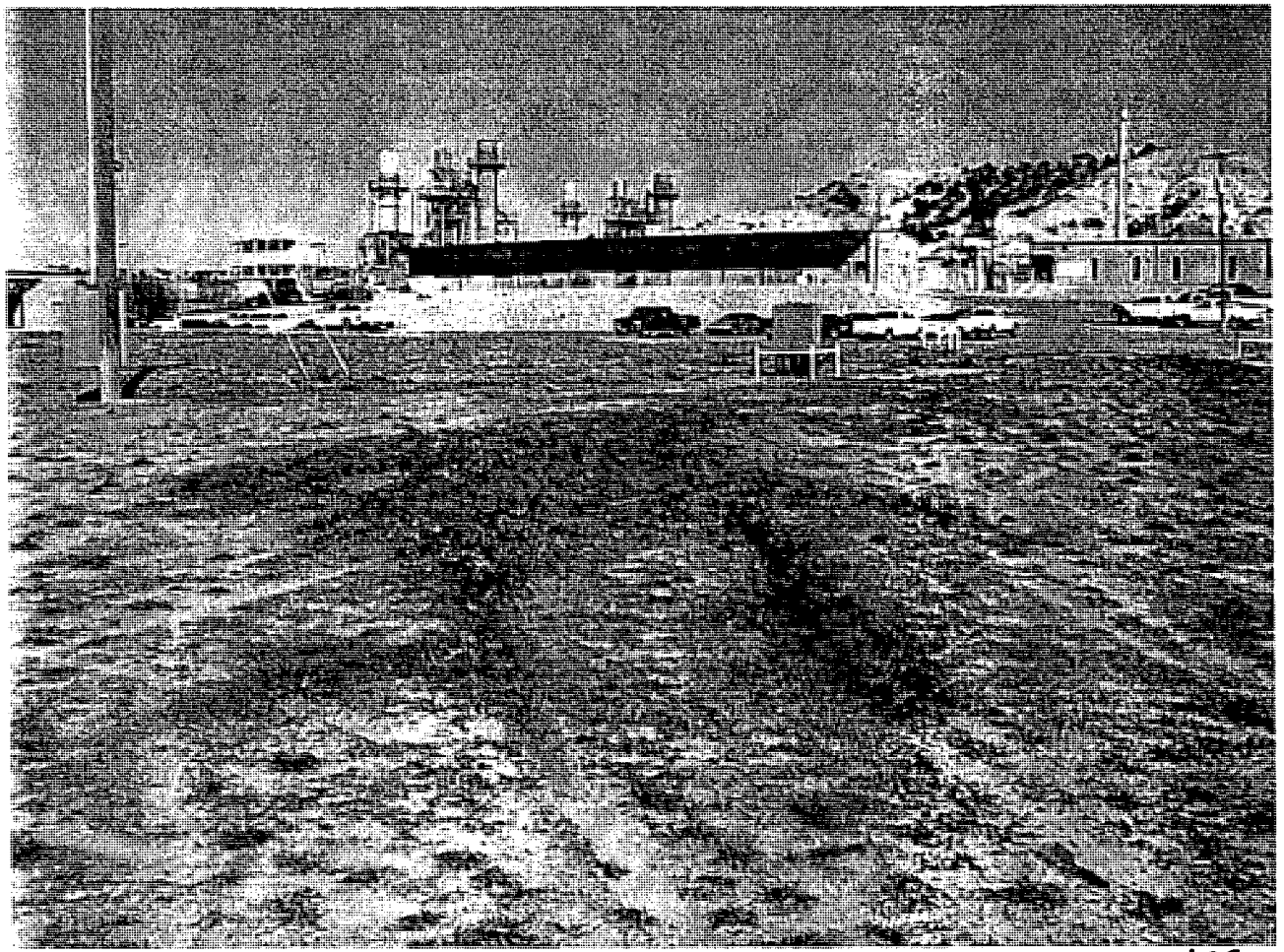
Cleanup Action Taken

On 2/27/99 soil samples were taken in both affected areas. Analytical results are expected within the next 10 working days, and a report will be provided to the OCD at that time. Stained soils removed from the affected areas on 2/2799 will either be landfarmed, or disposed at an OCD-approved facility. The need for additional cleanup will be determined based on analytical results received.


MILAGRO PLANT
NORTH
Photo 3
Photo 2
flow path
area of saturated soil in Photo 2
+ Junction Box
Photo 1
flow path
Evaporation Ponds
EVAPORATION BASIN
CONTROL POINT PANEL POINT
B.M. #3
MANZANARES OFFICE BUILDING
SHOP BLDG.
PLANT OFFICE
LABORATORY SHOP AND WAREHOUSE BUILDING

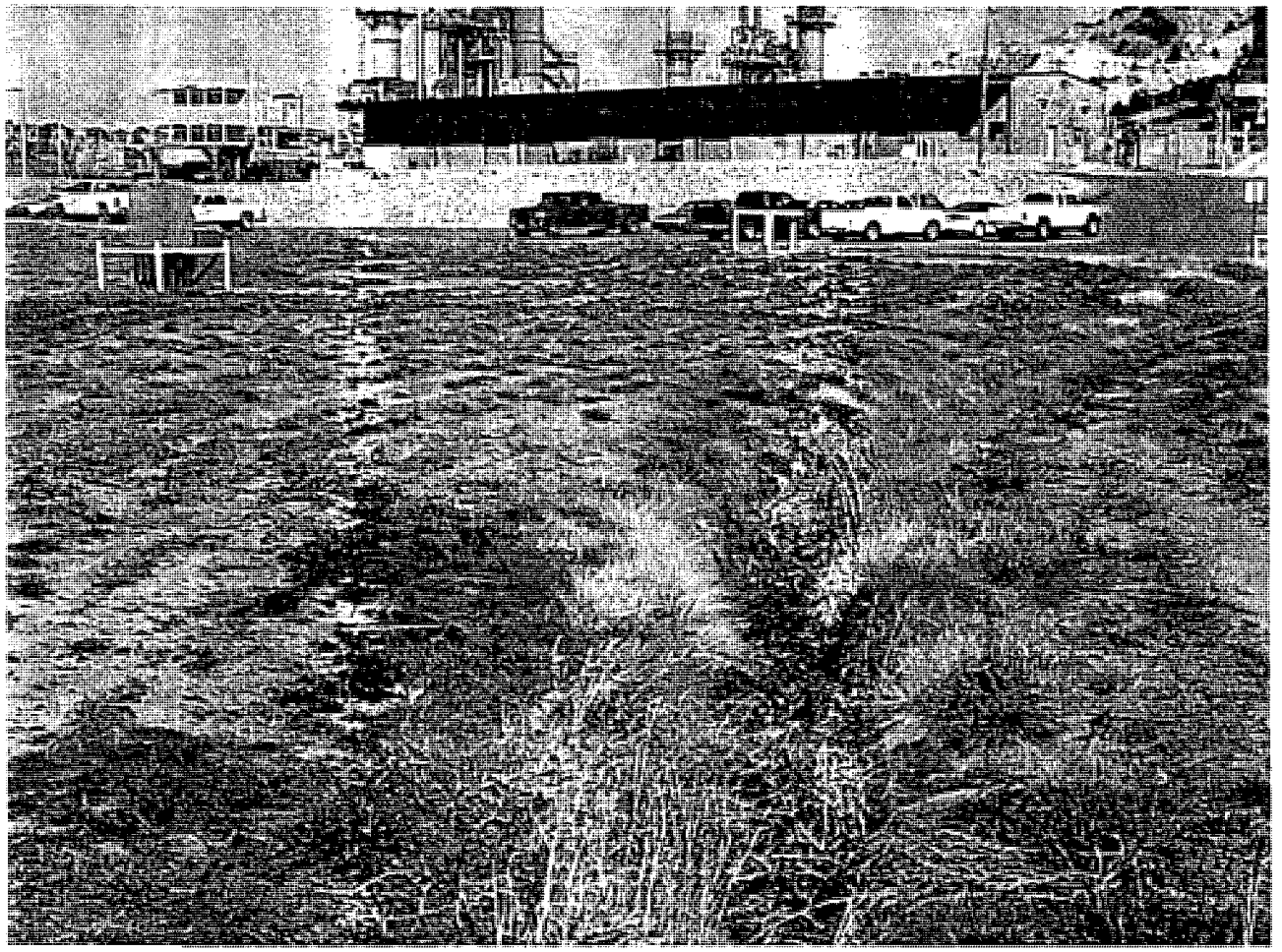
2/24/99

PHOTO 1
From west side of entrance road, where parking lot drainage goes under the road



2/24/99

PHOTO 2
Area of saturated soil west of junction box



2/24/99

PHOTO 3
Man-made drainage from parking lot into grassy field west of entrance road

"I think Cy is a very good addition to the water commission," Roberts said. "The thing I like about Cy being in this position is he should be an independent thinker on the water commission."

Roberts also said that Cooper should be able to "communicate"

■ See **Cooper** A6.

STAFF REPORT

SHIPROCK — If the winds cooperate, about two dozen hot-air balloons will float over Shiprock this weekend.

Saturday and Sunday mark the ninth annual Shiprock Balloon Rally. It's organized to benefit the Home for Women and Children here. The nonprofit shelter is one of two domestic-abuse shelters on the Navajo Nation that provide 24-hour emergency shelter.

In 1997, the program served 426 people and provided 1,099 bed days.

The invitation-only rally will include about 28 balloons, organizer Mick Hesse said. The only object is to fly safely over the top of the rock, he said.

The group will meet in Shiprock around 6 a.m. both days near the Shiprock air strip to determine wind conditions. If conditions are favorable, the

■ See **Shiprock** A6.

Marc F. Her

Safeway employee Lori Gomez rings up groceries at the Aztec grocery store Tues he supports abolition of sales taxes on gr

Oil commission cites several Milagro Plant spills

GREG MASSÉ
STAFF WRITER

BLOOMFIELD — A lawsuit filed against Williams Field Services claims that the company is polluting the environment. Williams disputes those claims.

The lawsuit charges that Clifton Veretto was poisoned by a chemical known as methyldiethanolamine. Robert Benson, the attorney representing Veretto in his lawsuit against Williams, wrote a letter to The Daily Times claiming that the company has "maintained an ongoing hazardous, chemical situation at that facility for some time."

In a Feb. 15 interview, a Williams spokesman denied these allegations. "We have had a safe operating record in this region and have put in a number of precautions in place to prevent accidents."

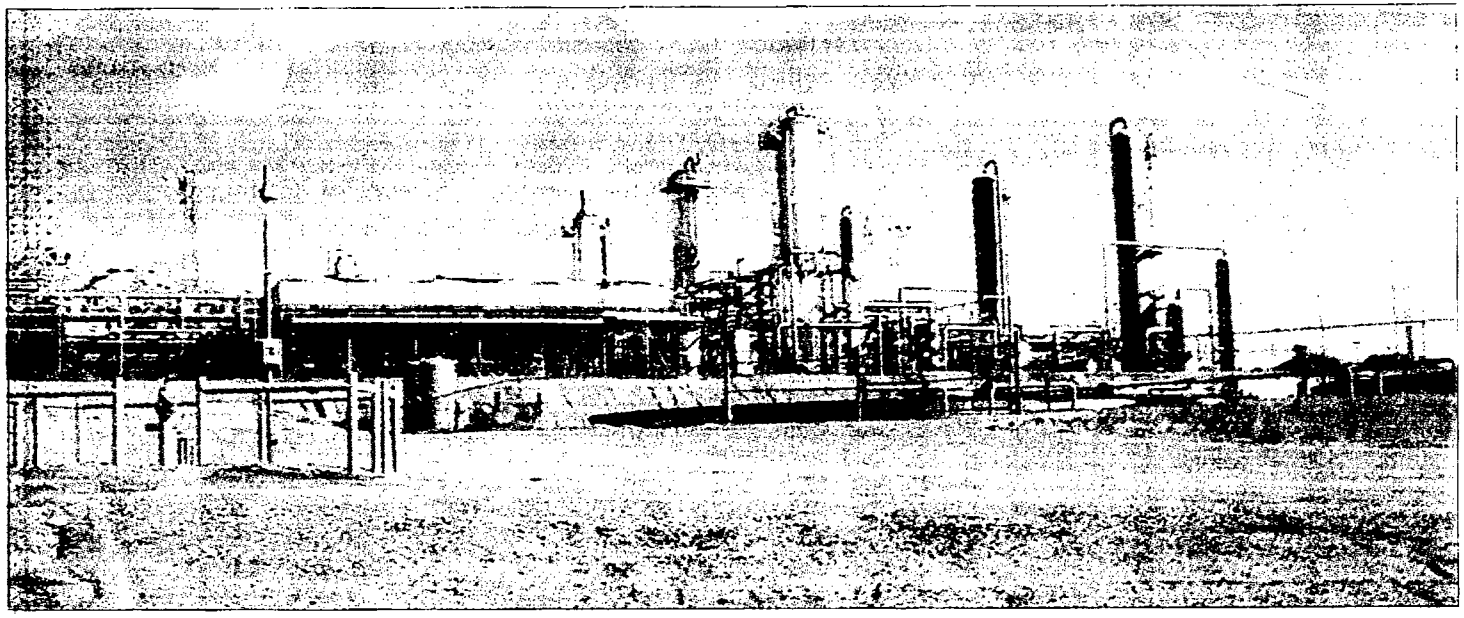
However, according to records kept by the New Mexico Oil Conservation Commission, the company has reported a total of 67 spills of various types in the district since 1993, 19 of which involved amine. Of the 19, four of these spills occurred at the Milagro Plant where Veretto claims he was contaminated.

The chemical — known throughout the industry as "amine" — is used by William's processing plants to separate water from natural gas.

"The interesting thing in this deal with my client is that they never reported a discharge. They had an ongoing discharge throughout that entire week. It was just being sprayed and misted into the air all over the place out there," said Benson. This means that the reported spills may not be the only ones to have occurred, he said.

These spills included a 100-gallon spill containing 50 per-

■ See **Milagro Plant** A6.



The Daily Times/File Photo

The Milagro Plant, shown in this file photo, has been the site of four spills, according to the New Mexico Oil Conservation Commission. A former plant employee alleges he was exposed to hazardous chemicals and is suing the company.

INDEX

Central

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fessor at Texas A & M in College Station, Texas; Wayne Nagy, director of the Lee County School District in Fort Meyers, Fla.; Dr. Harold Holder, superintendent of Cobre Consolidated Schools in southern New Mexico; and Dr. Phill Knight, superintendent in Ulysses, Kan.

While it was good to see candidates from New Mexico, being from the state doesn't give them a competitive edge, Manning said. The last time the district searched for a superintendent there were only one or two New Mexican applicants, he added.

The committee chose the semifinalists during a closed meeting Monday in Shiprock. The board members will proceed with the committee's selections, checking each applicant's references. The committee will meet again March 11 to choose the finalists, who will be invited to the area March 25 for a reception.

Before the reception, board members will visit the finalists at their schools to see how they run, Manning said. They will be interviewed March 26.

The new hire will take the place of Superintendent Dennis Seyfert who is retiring June 30. Seyfert has agreed to help out until the superintendent is comfortable with the job, Manning added.

Milagro Plant

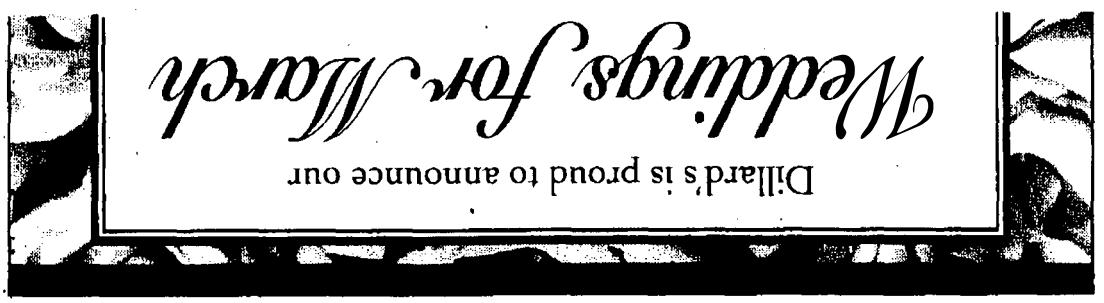
(Continued from A1)

cent amine and 50 percent water, Feb. 27, 1995, and a 1,600-gallon spill, all of which was recovered, Oct. 21, 1997.

The third and fourth were more recent, occurring in 1998. May 2 saw a 720-gallon spill containing 50 percent amine and Nov. 18 there was a 1000-gallon spill with a trace of amine.

Williams Field services did not deny the spills, however, a spokesman for Williams said, "We do not feel that amine has reached the water table." According to the spill reports, response to a spill of amine called for plant employees to "rake the gravel to accelerate the natural breakdown of the contaminants." It also read, "The amine/water and glycol mist fell on dry gravel and could not be recovered."

On the subject of the other reported spills, the Williams spokesman said, "From time to time there are product releases at a few of our energy facilities. We keep watch over more than 4,000 sites in the San Juan Basin which range from well heads to gas purification plants. However, no spills are acceptable and these instances are not common."



$1 million of slot machine pro- Pueblo's [redacted] and 8 percent above be beneath the law, bu[redacted] tribal sharing payments.

Farmington man claims he was poisoned

GREG MASSÉ
STAFF WRITER

BLOOMFIELD — Clifton Veretto of Farmington claims he's been poisoned.

In a lawsuit filed Jan. 29, Veretto said he was exposed while working as a welder at the Williams Field Service Milagro Plant to a mist of methyldiethanolemaine — a chemical that separates water from natural gas — and he now suffers severe, permanent injuries.

In his suit, Veretto claims the gas company is responsible for his injuries.

"The dollar volumes that are at stake for Williams run into the tens of millions of dollars a day in gas that's actually processed through that Milagro plant. The problem for them, is, to shut it down when they have crews — like Cliff was working on — come in there and do it, they lose that tens of millions of dollars a day," said Robert Benson, Veretto's attorney. "So rather than do that, what they do is they simply send these guys in there and let them work around it ... It was a decision of money over safety."

A Williams spokesman countered, "We are preparing a vigorous defense for the courtroom. The Veretto suit involves a contract welder who claims he was injured while working at our gas purification facility ... We conducted an investigation into the matter and discovered clear and convincing evidence that suggests otherwise.

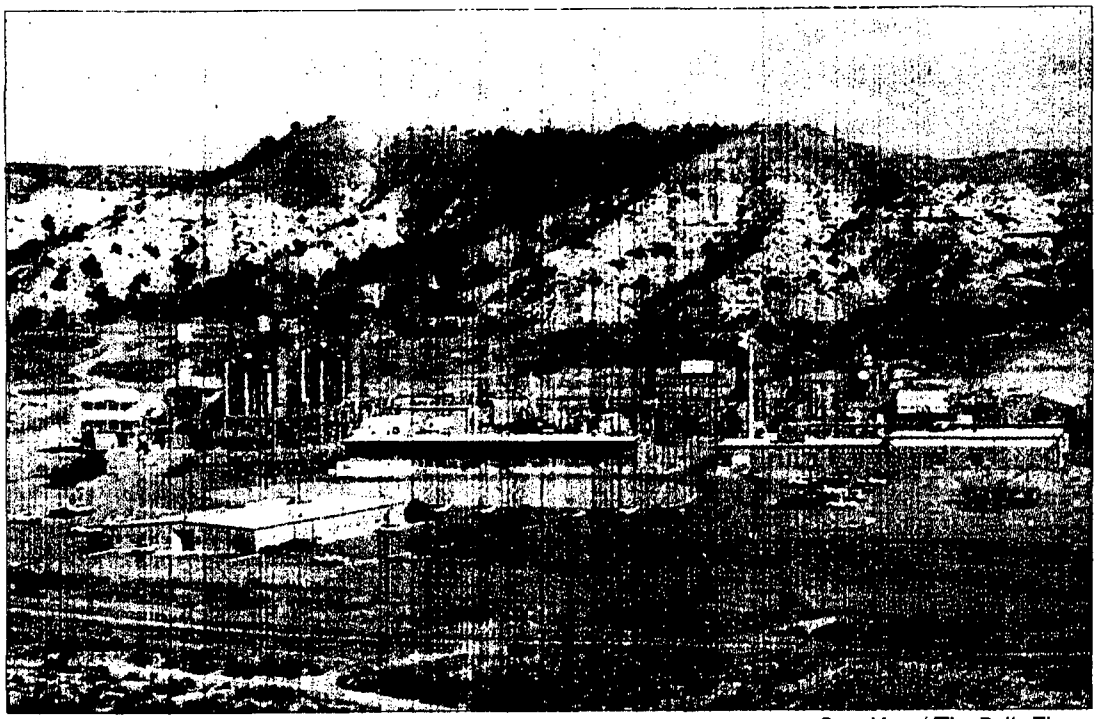
"If it would have been a valid claim, there would be no court case. We would have taken care of it. Period. We take the health and safety of our employees and contractors very seriously."

Benson described Veretto's injuries. "Really what happened is his lungs are destroyed. As (the chemical) is filtered out through some filters in the gas processing unit, they take the filters and dispose of them in state approved land farms ... What ends up happening, because of the methyldiethanolemaine, is that the filters ignite — they catch on fire on their own ... It's from the breakdown of the chemical composition.

"According to medical providers for Cliff, that's what's happening inside his lungs. He has burns on his skin and his hands and eyes and stuff," said Benson.

Aside from the lawsuit, Benson

■ See **Poisoned** A3.



Greg Massé/The Daily Times

The Williams Field Service Milagro Plant near Bloomfield was the site of an accident that left him permanently injured, a worker is claiming in a lawsuit.

Poisoned

(Continued from A1)

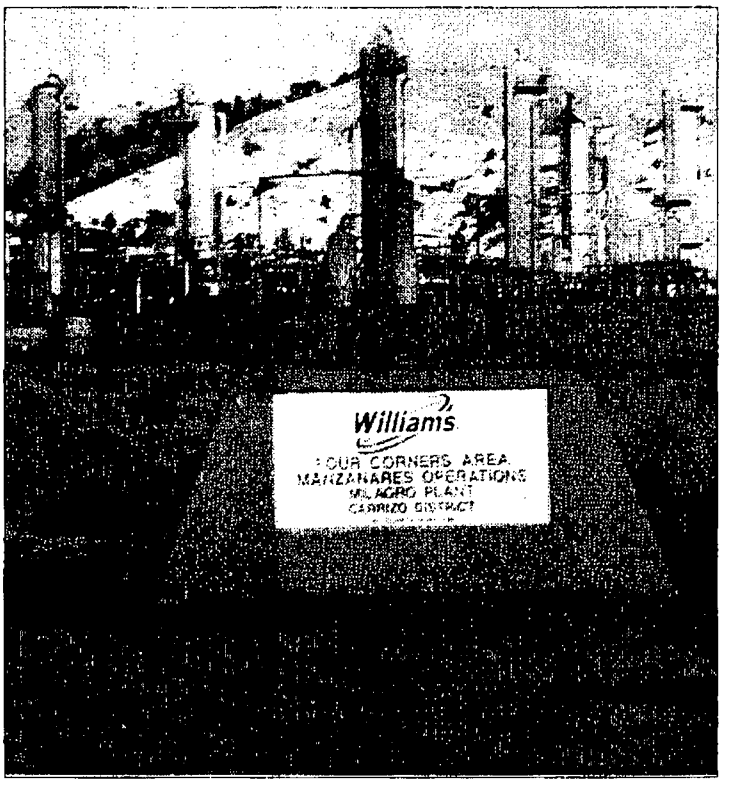
said the company has poisoned more than just the plaintiff.

"The problem ... is that when it gets into the ground, then it gets into the water. That, of course, affects all of the people who live in Bloomfield and on downstream," he said. "We've dealt with them quite extensively before filing the lawsuit to try to resolve this thing and get them to do something and clean up the area."

Ernie Busch, district geologist the for New Mexico Oil Conservation Division's district office, said there is no record of a report of any methyldiethanolemaine contamination in the area.

The Williams spokesman added, "The case is really about one individual claiming an injury rather than a larger environmental issue ... We do have a very clean operating record."

The lawsuit, filed in U.S. District in Albuquerque, may be resolved within 18 months, Benson said.



Greg Massé/The Daily Times

Williams Field Services Milagro Plant near Bloomfield.

Judges

(Continued from A1)

exists at the county jail. By screening defendants, judges can make more informed decisions about who can be released before trial.

Harrison estimated that nearly half the county jail population consists of prisoners who are awaiting trial.

"What we're trying to do is make better use of our jail space," Harrison said.

As part of the pretrial screening program, a court employee would track and follow up on defendants who have been released prior to trial. It's sort of like a supervised bail program, Birdsall and Harrison said.

The two judges are asking Farmington for a grant of $71,000 which would be used to fund a full-time court employee who would work with the Farmington Municipal Court and with district

the future.

Harrison said he got the idea for the pretrial program from his days working as a defense attorney in federal courts.

Currently, Harrison's pretrial program can handle 30 prisoners at any one time. That translates to a savings to the county of approximately $394,000 a year, if the average prisoner costs $36 per day to incarcerate, Harrison said.

Harrison said that if Farmington and the county both approve additional funding for the program, the number of participating prisoners and corresponding savings can both be doubled.

"Direct money savings would go to the county, because they run the jail system," Harrison said. "But Farmington would also benefit, because most of the people who are arrested and come before us

Harrison estimated that nearly half the county jail population consists of

Aftermath

(Continued from A1)

criminal offenses and that executive privilege could be overcome by the needs of prosecutors.

"The Clinton administration was almost reckless in its willingness to litigate each of these issues despite the remote possibility of success," said law professor Jonathan Turley, who represented four former attorneys general opposing the Secret Service privilege.

Future presidents can no longer presume that they — or the first lady — will be able to keep secret their conversations with top aides or government lawyers.

Past presidents benefited from the ambiguity in the law, trying to strike a bargain when Congress demanded testimony or documents, and storing away court challenges to be pulled out in moments of crisis.

"President Clinton virtually cleaned the pantry out and left little for the next occupant of the office," Turley said.

Likewise, the president fought Jones' right to sue all the way to the Supreme Court instead of negotiating a settlement