

**GW - 118**

**PERMITS,  
RENEWALS,  
& MODS  
Application**



# New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

**John H. Bemis**  
Cabinet Secretary

**Brett F. Woods, Ph.D.**  
Deputy Cabinet Secretary

**Jami Bailey**  
Division Director  
Oil Conservation Division



**FEBRUARY 21, 2012**

Mr. Danell Zawaski  
Williams Four Corners  
188 County Road 4900  
Bloomfield, New Mexico 87413

Dear Mr. Zawaski:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit", the Oil Conservation Division (OCD) has determined that the following facilities with a soon to expire permit are not required to operate under a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit for **GW-108** (SJ 30-5 #1 CDP CS), **GW-111** (SJ 32-8 # 2 CS), **GW-116** (32-8 3 CDP CS), **GW-117** (32-7 1 CDP CS), **GW-118** (31-6 1 CDP CS), **GW-120** (Pipkin CS), **GW-121** (SJ 29-6 # 2 CDP CS), **GW-122** (SJ 29-6 # 4 CDP CS), **GW-248** (Trunk A CS), **GW-249** (Trunk B CS), **GW-250** (Coyote Springs CS), **GW-256** (Lateral N-30 CS (Koch-Gardner)), **GW-257** (Trunk C CS), and **GW-274** (Pritchard Straddle CS) will be allowed to expire and you are not required to proceed with the renewal of these expired WQCC Discharge Permits. OCD will close these discharge permits in its database.

Because this WQCC Discharge Permit will now longer be in effect, you may be required to obtain separate OCD permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required. Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit.

Oil Conservation Division \* 1220 South St. Francis Drive

\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462\* <http://www.emnrd.state.nm.us>

Mr. Danell Zawaski

Page 2

If you have any questions regarding this matter, please contact Glenn von Goñten at 505-476-3488.

Thank you for your cooperation.

A handwritten signature in black ink, appearing to read "Jami Bailey". The signature is fluid and cursive, with the first name "Jami" and last name "Bailey" clearly distinguishable.

**Jami Bailey**

Director

JB/ll

**ATTACHMENT TO THE DISCHARGE PERMIT  
WILLIAMS FOUR CORNERS, LLC, 31-6 COMPRESSOR STATION (GW-118)  
DISCHARGE PERMIT APPROVAL CONDITIONS  
NOVEMBER 26, 2007**

**Please remit a check for \$1700.00 made payable to Water Quality Management Fund:**

**Water Quality Management Fund  
C/o: Oil Conservation Division  
1220 S. Saint Francis Drive  
Santa Fe, New Mexico 87505**

- 1. Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division (“OCD”) has received the required \$100.00 filing fee. However, the owner/operator still owes the required \$1700.00 renewal permit fee for a gas compressor station greater than 1001 horsepower.
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on June 19, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.*
- 3. Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 9, 2006 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

**5. Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

**6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

**A. OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

**B. Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

**7. Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

**8. Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

**9. Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

**10. Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

**11. Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

**12. Underground Process/Wastewater Lines:**

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

**13. Class V Wells:** The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

**14. Housekeeping:** The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

**15. Spill Reporting:** The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

**16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

**17. Storm Water:** The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

**18. Unauthorized Discharges:** The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

**19. Vadose Zone and Water Pollution:** The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

**20. Additional Site Specific Conditions:** N/A

**21. Transfer of Discharge Permit (WQCC 20.6.2.3111)** Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee. Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

**22. Closure Plan and Financial Assurance:** Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

**23. Certification: Williams Four Corners, LLC, (Owner/Operator),** by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Mr David Bays  
GW-118  
November 26, 2007  
Page 7 of 7

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Williams Four Corners, LLC  
Company Name-print name above

David Bays  
Company Representative- print name

David Bays  
Company Representative- signature

Title Sr. Environmental Specialist

Date: December 12, 2007





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

February 9, 2006

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

**Re: Discharge Plan GW-118, GW-121, GW-120 and GW-116 Application Renewal and Filing Fee**

Dear Mr. Price:

Enclosed please find copies of Discharge Plan application renewal and check number 4027021671 for \$400.00 to cover the filing fee for the following Williams Field Services (WFS) Compressor Stations:

- 31-6 Central Delivery Point (GW-118)
- 29-6#2 Central Delivery Point (GW-121)
- 32-8#3 Central Delivery Point (GW-116)
- Pipkin Compressor Station (GW-120)

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 505/632/4625.

Thank you,

Monica Sandoval  
Environmental Compliance

Xc: Brandon Powell, Aztec, OCD Dist III  
FCA Environmental File 220

Aztec Ret Rec # 17006 Q1SD 000343692895

From: Origin ID: FMNA (505)632-4625  
Monica Sandoval  
Williams Field Services  
188 CR 4900



Bloomfield, NM 87413

Ship Date: 14FEB07  
ActWgt: 2 LB  
System#: 7402067/INET2600  
Account#: S \*\*\*\*\*

Delivery Address Bar Code



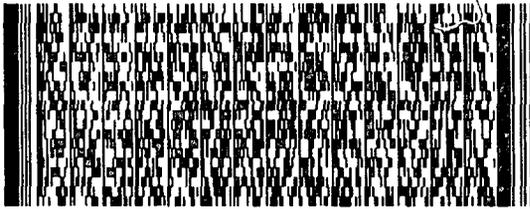
Ref #  
Invoice #  
PO #  
Dept #

SHIP TO: (999)999-9999

BILL SENDER

**Wayne Price**  
New Mexico Oil Conservation Div  
1220 S St. Francis Dr.

**Santa Fe, NM 87505**



**STANDARD OVERNIGHT**

**THU**

Deliver By:  
15FEB07

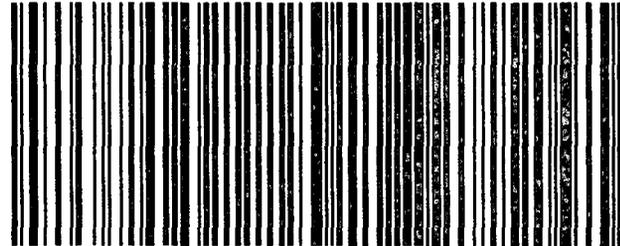
TRK# 7912 3253 4511

FORM  
0201

ABQ A2

87505 -NM-US

**9A SAFA**



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3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

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

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

Revised June 10, 2003  
Submit Original  
Plus 1 Copy  
to Santa Fe  
1 Copy to Appropriate  
District Office

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

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

New                       Renewal                       Modification

1. Type: Natural Gas Compressor Station (31-6 Central Delivery Point, GW-118)

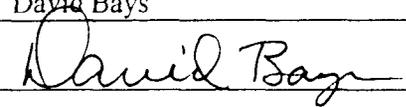
2. Operator: Williams Four Corners, LLC

Address: 188 County Road 4900, Bloomfield, NM 87413

Contact Person: David Bays Phone: (505) 634-4951

3. Location: SE/4 SW/4 Section 1 Township 30N Range 6W

- 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 daily quality and daily volume of waste water must be included.
- 8. Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.
- 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 rules, regulations, and/or orders.
- 14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: David Bays Title: Environmental Specialist  
Signature:  Date: January 30, 2007  
E-Mail Address: david.bays@williams.com



WILLIAMS FOUR CORNERS, LLC  
31-6 CENTRAL DELIVERY POINT  
DISCHARGE PLAN GW-118 RENEWAL

Prepared for:

New Mexico Oil Conservation Division  
Williams Four Corners, LLC  
188 County Road 4900  
Bloomfield, NM 87413

**Item 1**

*Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant (CO<sub>2</sub> removal) and compressor station include the total combined site rated horsepower.*

The 31-6 Central Delivery Point is a compressor station owned and operated by Williams Four Corners, LLC (Williams). The site will include the following equipment:

The site is permitted for eighteen Waukesha 7042GL Reciprocating Compressor Engines (site-rated compressor horsepower is 1370 hp) and eleven glycol dehydrators; however only sixteen engines and eleven dehydrators are currently installed at the site. Compressors and dehydrators may be installed or removed to meet demand. In addition, there are various storage tanks, support structures and ancillary equipment.

**Item 2**

*Name of operator or legally responsible party and local representative.*

<b>Legally Responsible Party/ Operator</b>	Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 632-4600/4634 (800)-645-7400 (24 hour emergency notification)
--	--

<b>Local Representative</b>	David Bays Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 634-4951
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**Item 3**

*Give a legal description of the location and county. Attach a large-scale topographic map.*

Rio Arriba County, New Mexico  
Township 30 North, Range 6 West, Section 1  
The topographic map is attached as Figure 1.

**Item 4**

*Attach the name, telephone number and address of the landowner of the facility site.*

Williams is leasing the subject property from:

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

**Item 5**

*Attach a description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.*

An updated facility diagram is included as Figure 2. The diagram updates the locations of tanks at the site.

**Item 6**

*Attach a description of all materials stored or used at the facility.*

Table 1 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

MSDSs for materials at the site are maintained in WFS's corporate office and are available upon request.

**Item 7**

*Attach a description of present sources of effluent and waste solids. Average quality and daily volume of wastewater must be included.*

The source, quantity, and quality of effluent and waste solids generated at the compressor station are summarized in Table 2.

**Item 8**

*Attach a description of current liquid and solid waste collection/treatment/disposal procedures.*

There have been no modifications to this item. Additionally, Table 1 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

**Item 9**

*Attach a description of proposed modifications to existing collection/treatment/disposal systems.*

No modifications to the facility are necessary to meet NMOCD requirements.

**Item 10**

*Attach a routine inspection and maintenance plan to ensure permit compliance.*

There have been no modifications to this item. See information on-file at OCD.

**Item 11**

*Attach a contingency plan for reporting and clean up of spills or releases.*

WFS will handle all spills and leaks immediately as required by company procedures and will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and WQCC Section 1203.

**Item 12**

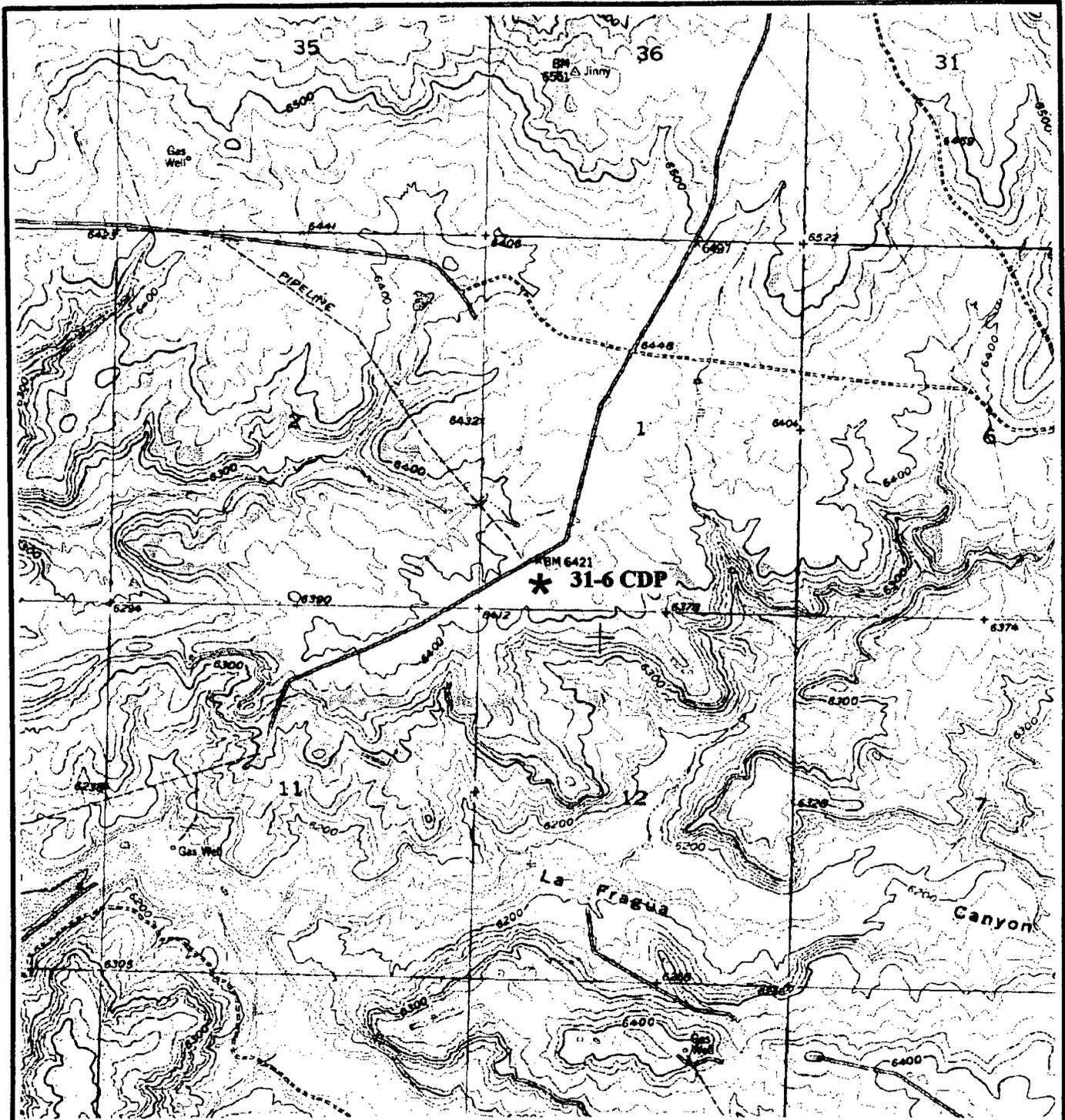
*Attach ecological/hydrological information for the facility. Depth to and quality of groundwater must be included.*

A current well search was performed for this renewal application. There is no new information to report for this item. See information on-file at OCD.

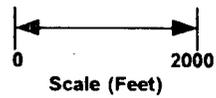
**Item 13**

*Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.*

There have been no modifications to this item. See information on-file at OCD.



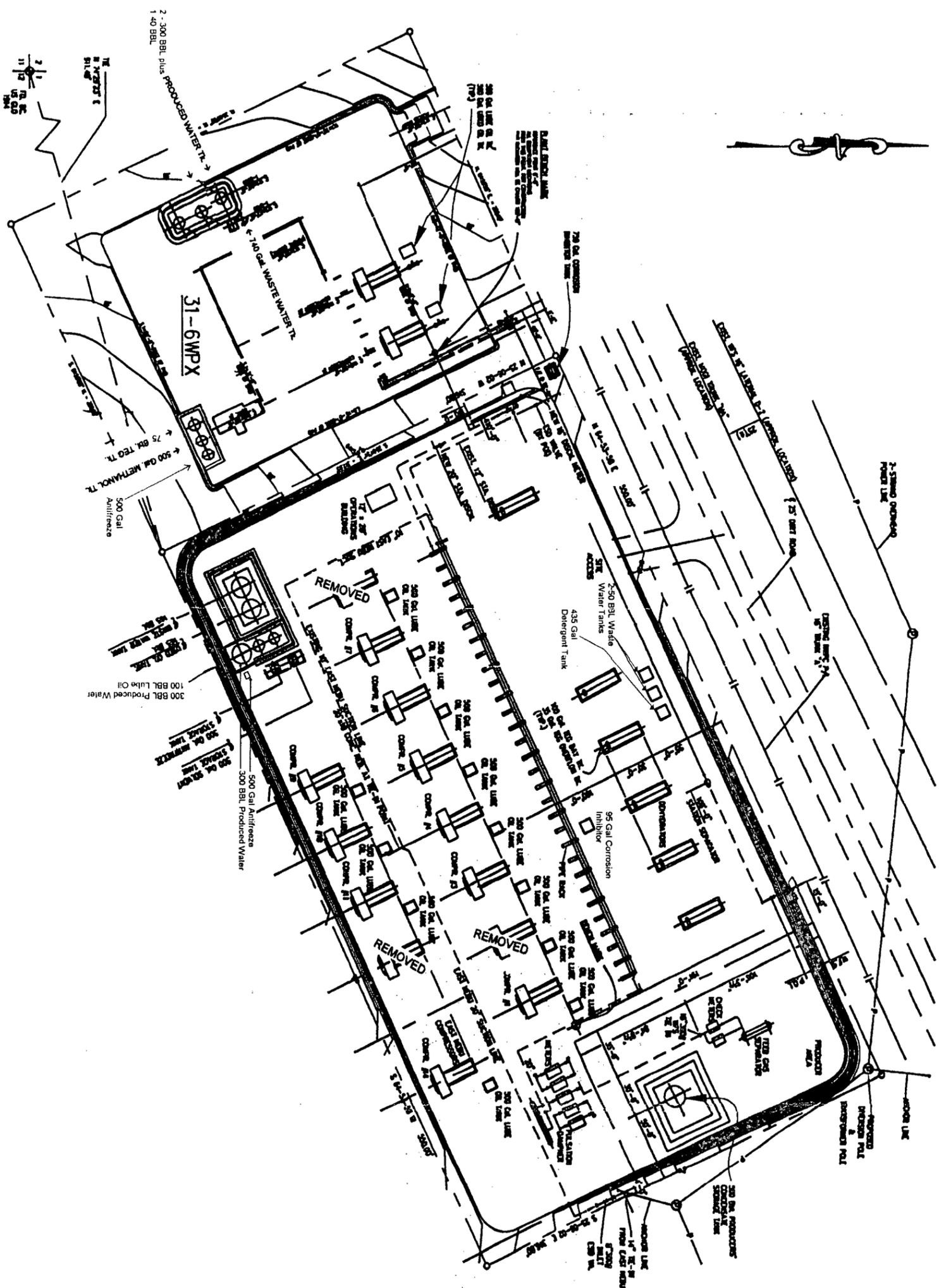
Source: USGS Gomez Ranch, NM Quadrangle



**Figure 1 Site Vicinity / Topographic Map**  
**31-6 CDP Compressor Station**  
 Section 1, Township 30N Range 6W  
 Rio Arriba County, New Mexico

SPILL PREVENTION CONTROL AND CONFINEMENT PLAN

FACILITY 'A' PRODUCT AND WASTE STORAGE LOCATIONS



Section	5	PREVENTION CONTROL
Office Date	10-4-99	

WILLIAMS FIELD SERVICIAL	
DRAFTING	BY DATE
DESIGNED BY	11-9-98
CHECKED BY	
APPROVED BY	
ENGINEER	BY DATE
	SCALE: 1" = 40'
31-6 B1 CDP STATION SPILL PREVENTION CONTROL AND CONFINEMENT PLAN PLOT PLAN	

**TABLE 1**  
**TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS**  
**31-6 CENTRAL DELIVERY POINT**  
**CDP SIDE**

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	6930 gal	Berm	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Produced Water	Above Ground Storage Tank	2 @ 12,600 gal	Berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams evaporation facility or may be disposed at NMOC-approved facility.
Wash-down Water/Waste Water	Above Ground Storage Tank	6930 gal	Berm	Non-exempt	Contractor may pump wash water back into truck after washing. water may be transported to NMOC-approved facility, or evaporation at WFS facility may be considered.
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	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.
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 NMOC Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
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.
Detergent	Above Ground Storage Tank	425 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Water	Above Ground Storage Tank	2 @ 2100 gal	None	N/A	N/A - used for washing.
Corrosion Inhibitor	Above Ground Storage Tank	750 gal 95 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Solvent	Above Ground Storage Tank	500 gal	Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	2 @ 500 gal	Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	100 gal* 50 gal*	Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	4200 gal 500 gal*	Berm 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 1  
TRANSFER, STORAGE AND DISPOSAL OF PROCESS FLUIDS, EFFLUENT AND WASTE SOLIDS  
31-6 CENTRAL DELIVERY POINT  
WPX SIDE**

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	500 gal*	Concrete pad and wastewater system	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Produced Water	Above Ground Storage Tank	1680 gal	Berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams evaporation facility or may be disposed at NMOC approved facility.
Wash-down Water/Waste Water	Above Ground Storage Tank	740 gal	Dual-walled fiberglass tank	Non-exempt	Contractor may pump wash water back into truck after washing, water may be transported to NMOC approved facility, or evaporation at WFS facility may be considered.
Condensate/Produced Water	Above Ground Storage Tank	2 @ 300 bbl	Berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams evaporation facility or may be disposed at NMOC approved facility.
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	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.
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 NMOC Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
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/disclosed consistent with applicable regulations.
Methanol	Above Ground Storage Tank	500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	3150 gal 100 gal* 125 gal*	Berm Concrete pad and wastewater system	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Antifreeze	Above Ground Storage Tank	500 gal	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	Above Ground Storage Tank	500 gal*	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**  
**31-6 CENTRAL DELIVERY POINT**

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Condensate/Produced Water	Inlet Scrubber, Gas Inlet Separator, Dehydrators	100-6000 bbl/year	No Additives
Wash Down Water/Waste Water	Compressor Skids	500-5000 gal/year/engine	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	Air, Inlet, Fuel Gas	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



Four Corners Area  
 Environmental Department  
 #188 County Road 4900  
 Bloomfield, N.M. 87413  
 Phone: (505) 832-4625  
 Fax: (505) 832-4781

January 18, 2007

**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 Four Corners, LLC is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted 31-8 Central Delivery Point (GW-118). 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 February 2007.

The facility, located in Section 1, Township 30 North, Range 6 West, Rio Arriba County, New Mexico, approximately 32 miles east of Aztec, provides natural gas compression and conditioning services.

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 200 to 500 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 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

7006 0100 0004 7940 4738

U.S. Postal Service	
<b>CERTIFIED MAIL RECEIPT</b>	
<i>(Domestic Mail Only - No Insurance Coverage Provided)</i>	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
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Restricted Delivery Fee (Endorsement Required)	\$0.00
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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



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**  
Cabinet Secretary

June 26, 2003

**Lori Wrotenbery**  
Director

**Oil Conservation Division**

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

**RE: Landfarm Operation  
31-6 CDP Compressor Station GW-118  
Rio Arriba County, New Mexico**

Dear Mr. Lane:

The New Mexico Oil Conservation Division (OCD) is in receipt of Williams Field Services Company's request to establish a landfarm operation at the 31-6 CDP Compressor station located in the SW/4 SW/4 Section 1, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Based upon the information received the request for landfarm operations is **hereby approved subject to the following stipulations:**

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

Mr. Michael K. Lane  
31-6 CDP Compressor Station GW-118  
June 26, 2003  
Page 2

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

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

Sincerely,



Roger C. Anderson,  
Environmental Bureau  
Oil Conservation Division

RCA/wjf

cc: OCD Aztec District Office

RECEIVED  
JUN 25 2003  
Oil Conservation Division



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

June 23, 2003

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

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

RE: Request to Develop a Centralized Landfarm at 31-6 CDP, Rio Arriba County, NM  
Discharge Plan: GW-118

This correspondence is to request permission to locate a centralized the landfarm at the reference facility for a one-time cleanup effort. Hanover Compression and Williams are planning to remediate soil contamination at the following Williams Field Service facilities in the Rosa Area south of the Navajo Reservoir: Quintana Mesa, Laguna Seca, 30-5 and 31-6.

The remediation effort is to address historic and incidental hydrocarbon contamination around idle compressor units, which have been recently removed, and other site activities. The exact volume of material from each site is not know but anticipated to be less than 25 cubic yards per site. The cleanup effort is schedule for this summer.

A centralized landfarm is planned for the 31-6 to accommodate the contaminated soils from all four sites. This will allow more efficient management of the remediation and reduce the number of sites with landfarms. Refer to the attached site diagram for the approximately location of the landfarm. Landfarming will follow the procedures currently approved by NMOCD and the landfarm will only be used to manage contaminated soils generated during this one-time cleanup effort. The landfarm will not be construct until permission is granted by NMOCD.

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

Respectfully submitted,

Michael Lane  
Williams Energy Services  
Four Corners Area Environmental Specialist

Encl:

XC: Dan Naylor, Team Lead  
31-6 Environmental File: 220  
Bryan Richardson, Hanover Compression



ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-118  
WILLIAMS FIELD SERVICES  
31-6 #1 CDP COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(March 19, 2002)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan renewal application dated January 31, 2002 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

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

16. Closure: The OCD will be notified when operations of the 31-6 #1 CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the 31-6 #1 CDP Compressor Station, a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by  AIR & REMEDIATION SUP.  
Title



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Betty Rivera**  
Cabinet Secretary

March 19, 2002

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 3929 7655**

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

**RE: Discharge Plan Renewal Approval GW-118**  
**Williams Field Services**  
**31-6 #1 CDP Compressor Station**  
**San Juan County, New Mexico**

Dear Mr. Baretta:

The ground water discharge plan renewal GW-118 and modification for the Williams Field Services 31-6 #1 CDP Compressor Station located in the SW/4 SW/4 of Section 1, Township 30 North, Range 6 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge plan application was submitted on April 24, 1992 and approved June 19, 1992. The discharge plan renewal application, dated January 31, 2002, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Mr. Mark J. Bareta  
GW-118 31-6 #1 CDP Compressor Station  
March 19, 2002  
Page 2

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **June 19, 2007**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

If not previously submitted Williams Field Services will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the 31-6 #1 CDP Compressor Station.

The discharge plan application for the Williams Field Services 31-6 #1 CDP Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of \$100. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The OCD has received the filing fee.

**Please make all checks payable to: Water Management Quality Management Fund  
C/o: Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505.**

If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/wjf  
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-118  
WILLIAMS FIELD SERVICES  
31-6 #1 CDP COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(March 19, 2002)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan renewal application dated January 31, 2002 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

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

16. Closure: The OCD will be notified when operations of the 31-6 #1 CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the 31-6 #1 CDP Compressor Station, a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: Williams Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

WILLIAMS FIELD SERVICES

by \_\_\_\_\_  
Title



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

February 25, 2002

RECEIVED

FFR 2 6 2002

Environmental Bureau  
Oil Conservation Division

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

Re: **31-6 #1 CDP Compressor Station (GW-118) Discharge Plan Modification**

Dear Mr. Ford:

Please be advised WFS will replace the existing 100 bbl condensate tank with a 300 bbl tank. The tank location is highlighted on attached facility plot plan. The containment is currently lined. The containment will be increased to at least 133% of the tank capacity and relined. 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: 31-6 #1 CDP Plot Plan  
Xc: Denny Foust, Aztec OCD





**DISCHARGE PLAN RENEWAL**

**31-6 #1 CDP COMPRESSOR STATION  
(GW-118)**

Williams Field Services Company

January 2002

## Table of Contents

I.	Type of Operation-----	1
II.	Legally Responsible Party -----	1
III.	Location of Facility -----	1
IV.	Landowner -----	1
V.	Facility Description-----	1
VI.	Source, Quantity, and Quality of Effluents and Waste Solids-----	1
VII.	Transfer, Storage, and Disposal of Process Fluids, Effluents, and Waste Solids-----	2
VIII.	Storm Water Plan -----	4
IX.	Inspection, Maintenance, and Reporting -----	5
X.	Spill/Leak Prevention and Reporting (Contingency Plans)-----	5
XI.	Site Characteristics -----	5
XII.	Facility Closure Plan -----	6

## List of Tables

Table 1 - Source, Quantity, and Quality of Effluent and Waste Solids -----	2
Table 2 - Transfer, Storage, and Disposal of Process Fluids, Effluents, and Waste Solids -----	3

## List of Figures - All figures follow Section XI

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

## List of Appendices

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

**I. TYPE OF OPERATION**

The 31-6 #1 CDP Compressor Station was built in 1992 to provide metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Milagro Plant.

**II. LEGALLY RESPONSIBLE PARTY**

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

**Contact Person:**

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

**III. LOCATION OF FACILITY**

The 31-6 #1 CDP Compressor Station is located in Section 1, Township 30 North, Range 6 West, in Rio Arriba County, New Mexico, approximately 31.7 miles east of Aztec, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangle: Gomez Ranch, New Mexico) as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section XI of the text.

**IV. LANDOWNER**

Williams Field Services is leasing the subject property from:

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

**V. FACILITY DESCRIPTION**

This facility is classified as a field compressor station and is unmanned. The air quality permit for this site has allowed the operation of sixteen 1,370 hp engines. Only twelve units are currently installed at the site. 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 compressor station are summarized in Table 1.

**TABLE 1**  
**SOURCE, QUANTITY, AND QUALITY OF EFFLUENT AND WASTE SOLIDS**  
**31-6 #1 CDP COMPRESSOR STATION**

PROCESS FLUID/WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	1000-2000 gal/year/engine.	Used motor oil w/no additives
Used Oil Filters	Compressor	50-100 filters/year/engine	No additives
Natural Gas Condensate	Scrubber, Gas Inlet Separator	2000-4000 bbl/year	No additives
Waste Water	Drawn of Natural Gas Condensate Tank	100-500 bbl/year	No additives
Wash-down Water	Compressor Skid	500-1500 gal/year/engine	Biodegradable Soap and tap water w/traces of used oil
Used Process Filters	Air, Inlet and Fuel Gas	75- 100/year	No additives
Empty Drums / Containers	Liquid Containers	10-20/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. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant. 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.

**TABLE 2  
TRANSFER, STORAGE, AND DISPOSAL OF PROCESS FLUIDS, EFFLUENTS, AND WASTE SOLIDS  
31-6 #1 CDP COMPRESSOR STATION**

<b>PROCESS FLUID/WASTE</b>	<b>STORAGE</b>	<b>CONTAINER CAPACITY (approximate)</b>	<b>CONTAINMENT/ SPILL PREVENTION</b>	<b>RCRA STATUS</b>	<b>DESCRIPTION OF FINAL DISPOSITION</b>
Used Oil	Above Ground Storage Tank	165 bbl (2) 500 gallons	Berm	Non-exempt	May be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Natural Gas Condensate	Above Ground Storage Tank	(2) 100 bbl	Berm	Exempt	Salable liquids may be sold to refinery or liquid may be disposed at NMOCDD- approved facility.
Wash-down Water	Above Ground Storage Tank	165 bbl 740 gallons	Berm	Non-Exempt	Water may be transported to NMOCDD-approved facility; or evaporation at WFS facility may be considered in future.
Used Process Filters	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the 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 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 NMOCDD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a WFS or contractor facility in drum or other container	Non-exempt	Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Solvent	Above Ground Storage Tank	500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Corrosion Inhibitor	Above Ground Storage Tank	750 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Methanol	Above Ground Storage Tank	500 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Glycol	Above Ground Storage Tank	50 bbl 500 gallons (7) 100 gallons (6) 35 gallons	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Compressor Oil	Above Ground Storage Tank	(12) 500 gallons 100 bbl	Berm	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

## VIII. STORM WATER PLAN

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

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

### **Site Assessment and Facility Controls**

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

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

### **Best Management Practices**

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

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

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

**IX. INSPECTION, MAINTENANCE AND REPORTING**

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

In the event of a release of a reportable quantity, the operator reports the release to a 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 and will be equipped with an impermeable liner. The below-grade tanks will be constructed with a means of leak detection, and will either be double-bottomed tanks or a tank set on an impermeable pad.

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

**XI. SITE CHARACTERISTICS**

The 31-6 #1 CDP Compressor Station is located approximately 31.7 miles east of Aztec, New Mexico. The site elevation is approximately 6,410 feet above mean sea level. The natural ground surface topography slopes downward toward the south. The maximum relief over the site is approximately 15 feet. Intermittent flow from the site will follow natural drainage to the south to the La Fragua Canyon drainage. La Fragua Canyon drains to the west into Navajo Lake. The Navajo Lake, approximately 1.6 miles to the southwest of the site, is nearest down-gradient perennial source of surface water at an elevation of approximately 6,100 feet.

A review of the available hydrologic data<sup>1,2</sup> for this area revealed that there are no water wells within a 1/4-mile radius of 31-6 #1 CDP Compressor Station. The water-bearing unit in this area is the San Jose Formation. The San Jose Formation is the youngest Tertiary bedrock unit. This formation consists of a sequence of interbedded sandstone and mudstone. The estimated ground water depth at the site is 200 to 500 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 2,000 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

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

<sup>2</sup>Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2000.

**XII. FACILITY CLOSURE PLAN**

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

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

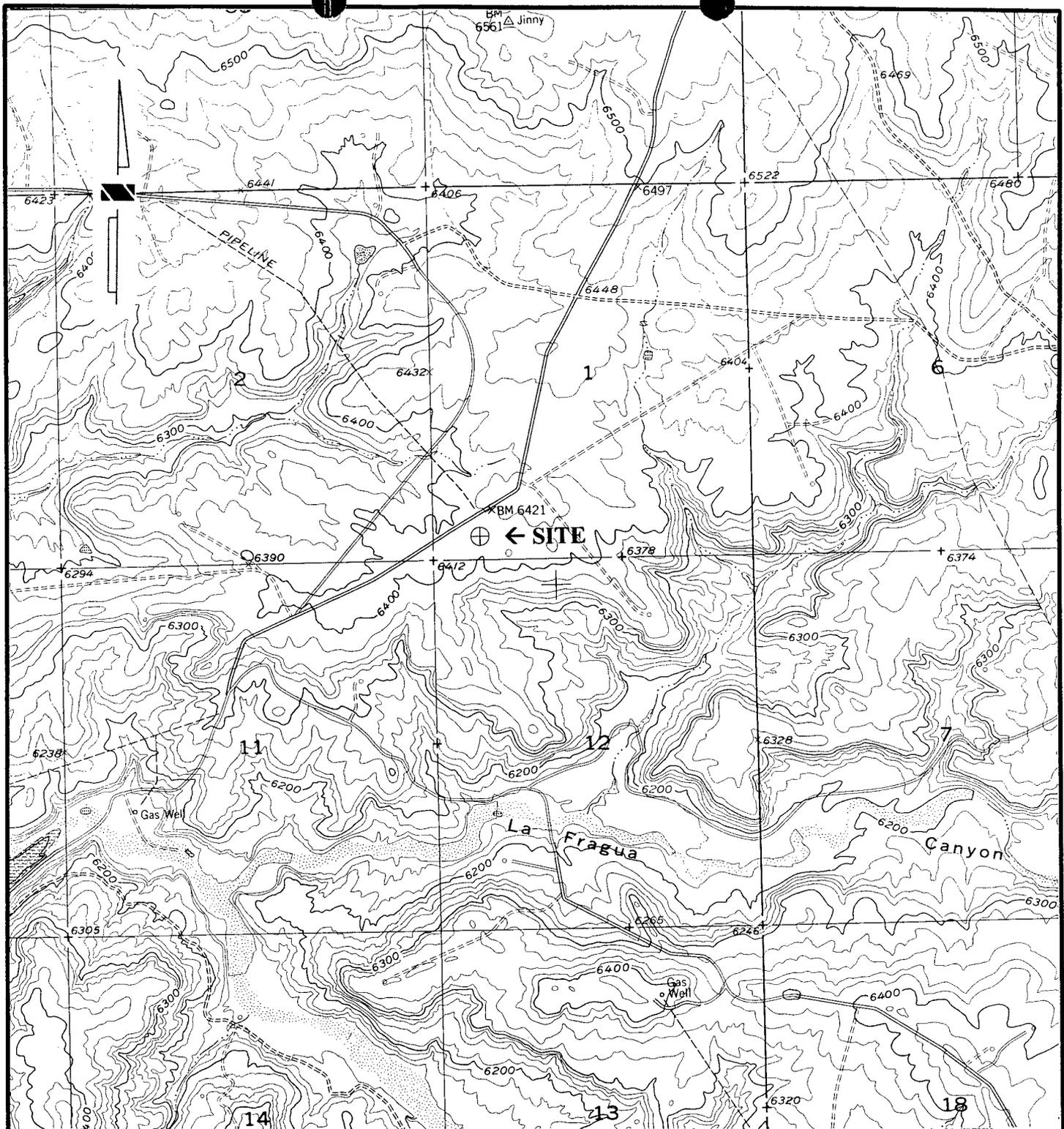
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

**FIGURE 1**

**SITE VICINITY / TOPOGRAPHIC MAP**

**FIGURE 2**

**SITE PLAN**



Source: USGS Gomez Ranch, New Mexico Quadrangle

Scale: 1" = 2,000'



**Figure 1 Site Vicinity / Topographic Map**  
**31-6 #1 CDP Compressor Station**  
 Section 1, Township 30N Range 6W  
 Rio Arriba County, New Mexico

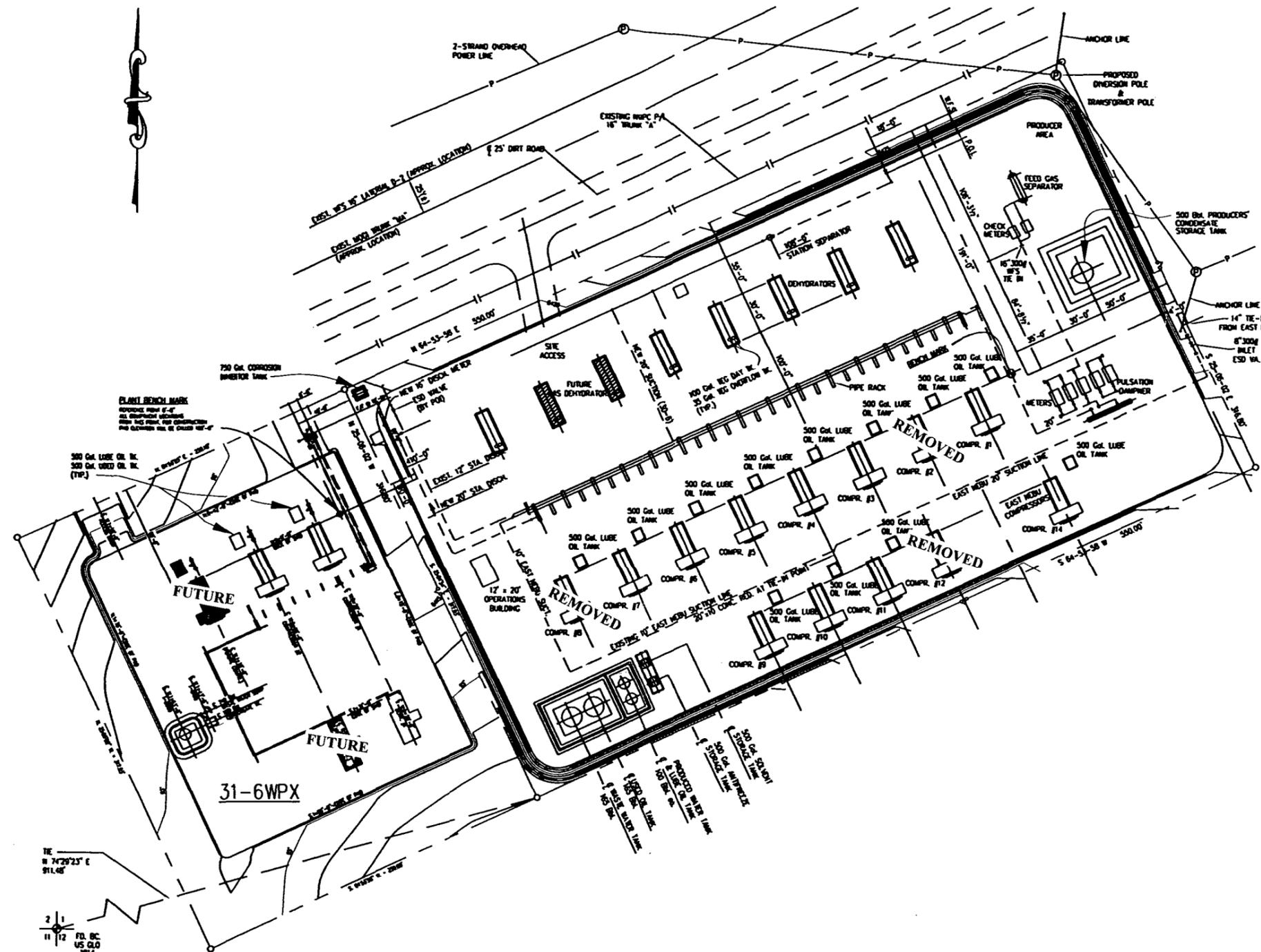
**APPENDIX A**

**SPILL CONTROL PROCEDURES**

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

ATTACHMENT "A" PRODUCT AND WASTE STORAGE LOCATIONS

OPERATIONS		
Project	31-6 #1 C.D.P. STATION	
Section	SPILL PREVENTION CONTROL	Document No. 4213001
Effective Date	10-4-99	Issue No. 06 Page No. 3 of 8



REFERENCE DRAWINGS										REFERENCE DRAWINGS										REVISIONS										DRAFTING										BY										DATE										STATE: NEW MEXICO										COUNTY: RIO ARriba										WILLIAMS FIELD SERVICES										ONE OF THE WILLIAMS COMPANIES																																																																																																																																																																																			
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**APPENDIX B**

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



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

April 26, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-357-870-088**

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

**RE: Site Modifications Notification  
GW-118, 31-6 Compressor Station  
Rio Arriba County, New Mexico**

Dear Ms. Deklau:

The OCD has received the site modification letter, dated May 11, 1999, from Williams Field Services for the 31-6 Compressor Station GW-118 located in SW/4 SW/4, Section 1, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. **The site modifications are approved without modification to the discharge plan with the stipulation that all modifications comply with the discharge plan approved May 16, 1997.**

Please note that Section 3104 of the regulations requires that **"When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."** Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. Further, this approval does not relieve Williams Field Services from liability should operations result in contamination to the environment.

Sincerely,

W. Jack Ford, C.P.G.  
Environmental Bureau  
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

April 26, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-357-870-082**

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

**RE: Site Modifications Notification  
GW-118, 31-6 Compressor Station  
Rio Arriba County, New Mexico**

Dear Ms. Deklau:

The OCD has received the site modification letter, dated April 2, 1999, from Williams Field Services for the 31-6 Compressor Station GW-118 located in SW/4 SW/4, Section 1, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. **The site modifications are approved without modification to the discharge plan with the stipulation that all modifications comply with the discharge plan approved May 16, 1997.**

Please note that Section 3104 of the regulations requires that **"When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."** Pursuant to Section 3107.C Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. Further, this approval does not relieve Williams Field Services from liability should operations result in contamination to the environment.

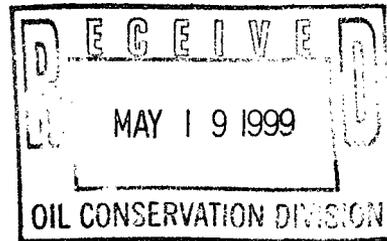
Sincerely,

W. Jack Ford, C.P.G.  
Environmental Bureau  
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office



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



May 14, 1999

Mr. Jack Ford  
NM OCD  
2040 South Pacheco  
Santa Fe, New Mexico 87505

Re: WFS Requests for Modification of Various OCD Discharge Plans

Dear Mr. Ford:

Enclosed you will find formal requests for modification of OCD Discharge Plans for sites listed in the following categories on my March 1999 submittal to you:

- Category 1 Update OCD Plans for actual compression; AQB permit allows additional installs
- Category 3 Update OCD Plans for actual compression; all AQB permitted units installed
- Category 5 Current OCD Plan reflects actual installs; AQB permit allows additional installs.

The table below lists the sites for which modifications have been requested.

Category 1	Category 3	Category 5
31-6	Rosa #1	30-5
32-7	Trunk M	30-8
32-8#2	La Jara	Decker Junction
Horse Canyon	Note 1: 29-6#2 belongs in Cat. 6	Sims Mesa
Middle Mesa	Note 2: Pipkin OCD plan reflects more units than actual installs	Lateral N-30
Pump Mesa		
Trunk N		
Trunk L		

For sites that fall under Categories 1 and 3, the OCD Discharge Plans need to be modified to reflect the actual number of units currently installed at the site, and also allow room for additional installations for which WFS currently holds Air Permits.

For sites that fall under Category 5, the OCD Discharge Plan properly reflects the current number of units installed, but the Plan should be modified to allow for the additional units allowed under WFS Air Permits for the site.

If you have any questions or require additional information, I can be reached at 801-584-6543.

Sincerely,



Ingrid Deklau  
Environmental Specialist

Xc: Denny Foust, Aztec OCD



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

May 11, 1999

Mr. Jack Ford  
NM OCD  
2040 South Pacheco  
Santa Fe, New Mexico 87505

Re: Modification of Williams Field Services Discharge Plan for 31-6 (GW – 118)

Dear Mr. Ford:

Pursuant to our conversation today and my March 1999 submittal to you, Williams Field Services (WFS) formally requests modification to the Discharge Plan for the 31-6 compressor site to allow the installation of up to sixteen 1370 horsepower units. There are currently fifteen units operating at the site. A July 3, 1997 letter mentioned the installation of nine additional units to the existing six units, but did not specify the increase in horsepower (from 990 to 1370). No additional waste streams will be generated with this modification. This modification corresponds to permitting levels allowed by the Air Permit currently held for this site.

If you have any questions or require additional information, I can be reached at 801-584-6543.

Sincerely,

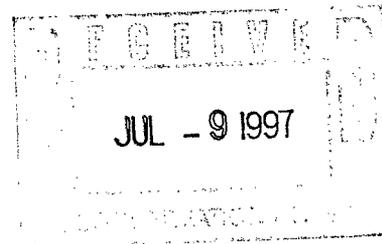
A handwritten signature in black ink, appearing to read "Ingrid Deklau".

Ingrid Deklau  
Environmental Specialist

XC: Denny Foust, Aztec OCD

# WILLIAMS ENERGY GROUP

## FIELD SERVICES



July 3, 1997

Patricio Sanchez  
New Mexico Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

**Re: San Juan 31-6#1 CDP, GW-118 OCD Discharge Plan Fee  
San Juan 31-6#1 CDP, GW-118 OCD Discharge Plan Update**

Dear Mr. Sanchez:

Pursuant to the requirements of Section 3-114 of the New Mexico Water Quality Control Commission Regulations and as requested in the letter dated May 16, 1997, I am enclosing check number 59366 for \$690.00 to cover the Discharge Plan fees for the San Juan 31-6#1 CDP. Also enclosed is a signed copy of the Conditions of Approval.

Additionally, this letter also serves as notification of various updates and clarifications to the San Juan 31-6#1 CDP Discharge Plan.

- A new contact person has been assigned to this site: Ingrid Deklau, Senior Environmental Specialist, (801) 584-6543. No change has been made to the address listed in the plan.
- Table 1 (Sources and Disposition of Process Fluids) on page 4 of the text should be clarified with the following underlined text. There are no other changes to information in the table.
  - Source: Glycol Regeneration
  - Disposition: Collected separately in evaporation standpipe; pipd to tank containing Washdown Water.
  - Source: Washdown Water
  - Disposition: Collected in tank. (The word 'separately' can be deleted since this wastestream is combined with condensate from glycol regeneration.)
- The second sentence of the application letter submitted by Williams Field Services on March 14, 1997 should be clarified to read that 'WFS has permitted nine additional Waukesha 7042GL compressor engines and one additional glycol dehydrator with the Air Quality Bureau. Currently there are six compressors and five dehydrators operating on the site.' The additional equipment will be installed on an as-needed basis, and as the aforementioned letter indicates, no new liquid waste streams would be generated by installation of the permitted equipment.

None of the above issues represents a significant modification of the approved discharge. If you have any questions, I can be reached at (801) 584-6543. Your assistance in handling these matters is appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Ingrid A. Deklau', followed by a horizontal line extending to the right.

Ingrid A. Deklau  
Senior Environmental Specialist

enclosures

Mr. Lee Bauerle  
Williams Field Services  
"San Juan 31-6#1 CDP" GW-118  
May 16, 1997  
Page 3

**ATTACHMENT TO DISCHARGE PLAN GW-118**  
**Williams Field Services San Juan 31-6#1 CDP Compressor Station**  
**DISCHARGE PLAN REQUIREMENTS**  
(May 16, 1997)

1. **Payment of Discharge Plan Fees:** The \$690 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments of \$138 per installment over the duration of the plan, with the first payment due upon receipt of this approval.
2. **Williams Field Services Commitments:** Williams Field Services will abide by all commitments submitted in the application dated March 14, 1997 from Williams Field Services, the approval letter from OCD dated June 19, 1992, and this approval letter with conditions of approval from OCD dated May 16, 1997.
3. **Waste Disposal:** All wastes shall be disposed of at an NMOCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an NMOCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.
5. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
7. **Above Ground Saddle Tanks:** Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. **Tank Labeling:** All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

Mr. Lee Bauerle  
Williams Field Services  
"San Juan 31-6#1 CDP" GW-118  
May 16, 1997  
Page 4

9. **Below Grade Tanks/Sumps:** All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

10. **Underground Process/Wastewater Lines:** All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present, and then every 5 years there after. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD.

11. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any soils contaminated with a non-exempt waste at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

12. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Aztec OCD District Office at (505)-334-6178.

13. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

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

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

Accepted:  
Williams Field Services

by   
Title Sr. Environ' Spec



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

May 16, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-410-431-383**

Mr. H. Lee Bauerle  
Williams Field Services  
295 Chipeta Way  
P.O. Box 58900  
Salt Lake City, Utah 84158-0900

**RE: Discharge Plan GW-118  
San Juan 31-6#1 CDP  
Rio Arriba County, New Mexico**

Dear Mr. Bauerle:

**The discharge plan renewal GW-118 for the Williams Field Services San Juan 31-6#1 CDP Compressor Station located in SW/4 SW/4, Section 1, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan renewal consists of the application dated March 14, 1997 from Williams Field Services, the approval letter from OCD dated June 19, 1992, and this approval letter with conditions of approval from OCD dated May 16, 1997. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within ten (10) working days of receipt of this letter.**

The discharge plan renewal application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve Williams Field Services of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

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

Mr. Lee Bauerle  
Williams Field Services  
"San Juan 31-6#1 CDP" GW-118  
May 16, 1997  
Page 2

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

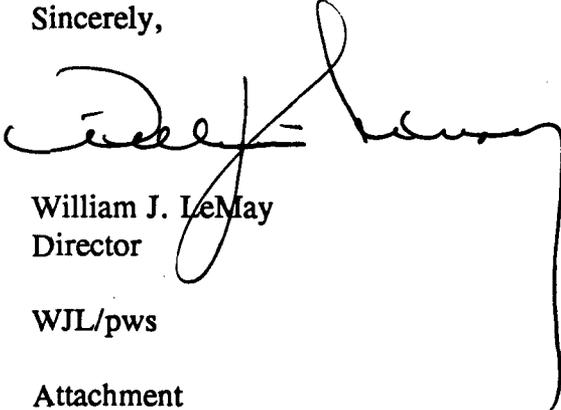
Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. This approval will expire June 19, 2002, and an application for renewal should be submitted in ample time before that date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval.

The discharge plan renewal for the Williams Field Services San Juan 31-6#1 CDP Compressor Station GW-118 is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty dollars (\$50) plus a flat fee in the amount of six-hundred and ninety dollars (\$690) for compressor stations over 3,000 horsepower.

The \$50 filing fee has been received by the OCD. **The \$690 flat fee has not been received by the OCD and is due upon receipt of this approval letter.** The flat fee may be paid in one lump sum in the amount of \$690, or five equal annual installments of \$138 per installment, with the first installment due upon receipt of this approval letter. **All checks shall be made payable to NMED-Water Quality Management, and sent to OCD Santa Fe Division office.**

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



William J. LeMay  
Director

WJL/pws

Attachment

c: Aztec OCD District Office.

Mr. Lee Bauerle  
Williams Field Services  
"San Juan 31-6#1 CDP" GW-118  
May 16, 1997  
Page 3

**ATTACHMENT TO DISCHARGE PLAN GW-118**  
**Williams Field Services San Juan 31-6#1 CDP Compressor Station**  
**DISCHARGE PLAN REQUIREMENTS**  
(May 16, 1997)

1. **Payment of Discharge Plan Fees:** The \$690 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments of \$138 per installment over the duration of the plan, with the first payment due upon receipt of this approval.
2. **Williams Field Services Commitments:** Williams Field Services will abide by all commitments submitted in the application dated March 14, 1997 from Williams Field Services, the approval letter from OCD dated June 19, 1992, and this approval letter with conditions of approval from OCD dated May 16, 1997.
3. **Waste Disposal:** All wastes shall be disposed of at an NMOCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an NMOCD approved facility upon proper waste characterization per 40 CFR Part 261.
4. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.
5. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
7. **Above Ground Saddle Tanks:** Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. **Tank Labeling:** All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

Mr. Lee Bauerle  
Williams Field Services  
"San Juan 31-6#1 CDP" GW-118  
May 16, 1997  
Page 4

9. **Below Grade Tanks/Sumps:** All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks /or sumps.

10. **Underground Process/Wastewater Lines:** All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present, and then every 5 years there after. Companies may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD.

11. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any soils contaminated with a non-exempt waste at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

12. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Aztec OCD District Office at (505)-334-6178.

13. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

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

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

Accepted:  
Williams Field Services

by \_\_\_\_\_  
Title



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



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

March 3, 1993

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-111-334-304**

Ms. Carol Revelt  
Environmental Specialist  
Williams Field Services Company  
P.O. Box 58900  
Salt Lake City, Utah

**Re: Discharge Plan Modifications  
Manzanares Gathering System  
San Juan County, New Mexico  
Rio Arriba County, New Mexico**

Dear Ms. Revelt:

The Oil Conservation Division (OCD) has received your letter dated February 17, 1993 requesting a determination on Williams Field Services' proposed modifications of existing compressor facilities as to what effect this would have on the existing discharge plans. The discharge plan modifications were submitted pursuant to Section 3-109.F. of the New Mexico Water Quality Control Commission (WQCC) Regulations.

Pursuant to WQCC Regulation 3-109.F. the modification to the previously approved discharge plans are hereby approved. The OCD has determined that these modifications are minor, therefore, public notice was not issued and the required flat rate fee for modification of a discharge plan is waived. However, the regulations require that a fifty (50) dollar filing fee be paid for each of the eleven specified facilities. The filing fee for the discharge plan modifications are due upon receipt of this letter.

Please make checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

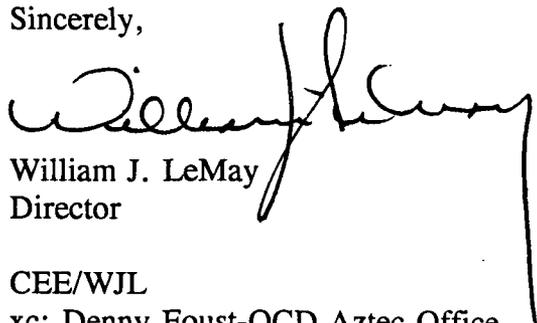
Ms. Carol Revelt  
March 3, 1993  
Page 2

The approved modifications are to the following facilities:

- (GW-121) San Juan 29-6 No.2 C.D.P. Compressor Station
- (GW-122) San Juan 29-6 No.4 C.D.P. Compressor Station
- (GW-118) San Juan 31-6 No.1 C.D.P. Compressor Station
- (GW-117) San Juan 32-7 No.1 C.D.P. Compressor Station
- (GW-111) San Juan 32-8 No.2 C.D.P. Compressor Station
- (GW-116) San Juan 32-8 No.2 C.D.P. Compressor Station
- (GW-87) Cedar Hill Compressor Station
- (GW-61) Horse Canyon Compressor Station
- (GW-64) Middle Mesa Compressor Station
- (GW-63) Pump Mesa Compressor Station
- (GW-68) Sims Mesa Compressor Station

If you have any question you can contact the Environmental Bureau at (505) 827-5812.

Sincerely,

  
William J. LeMay  
Director

CEE/WJL  
xc: Denny Foust-OCD Aztec Office  
11 Discharge Plan files

OIL CONSERVATION DIVISION  
RECEIVED

'93 FEB 22 AM 9 44

**WILLIAMS FIELD SERVICES COMPANY**   
ONE OF THE WILLIAMS COMPANIES  
P.O. BOX 58900  
SALT LAKE CITY, UTAH 84158-0900  
801-583-8800  
FAX: (801) 584-6483

February 17, 1993

Mr. Roger Anderson  
New Mexico Oil Conservation Division  
State Land Office Building  
310 Old Santa Fe Trail  
Santa Fe, New Mexico 87504

Re: Manzanares System C.D.P. Facility Expansion - San Juan and Rio Arriba Counties

Dear Mr. Anderson:

The attached table summarizes the anticipated current and future expansion of the Williams Field Services' Manzanares Gathering System C.D.P.'s, and the corresponding increase in waste fluids which will be generated at these locations. Although new compressors and/or dehydrators are being added at these sites, no additional bulk storage for waste liquids (used oil, waste water, etc.) will be installed above that which is currently located at the facilities.

Williams Field Services believes that the addition of these units will result in insignificant increases in the fluids handled at the specific C.D.P.'s. Please review this table and advise me of any Discharge Plan modifications which you determine will be necessary.

Thank you for your attention to this matter.

Sincerely,

*Carol Revelt*

Carol Revelt  
Environmental Specialist

Attachment

cc: D. Compton, 10309  
J. West, MND

**WILLIAMS FIELD SERVICES - MANZANARES GATHERING SYSTEM  
CENTRAL DELIVERY POINT EXPANSION/MODIFICATION**

<u>C.D.P. Name</u>	<u>Location</u>	<u>Discharge Permit #</u>	<u>Original # Compressors</u>	<u>Additional Compressors</u>	<u>Anticipated Additional Waste-Oil Generated</u>	<u>Original # Dehydrators</u>	<u>Additional Dehydrators</u>	<u>Anticipated Additional Waste Water Generated</u>
29-6 No. 2	Sec. 10, 29N, 6W Rio Arriba County	GW-121	5	2	250 gal/quarter	5	2	30 gal/day
29-6 No. 4	Sec. 19, 29N, 6W Rio Arriba County	GW-122	4	3	375 gal/quarter	2	2	30 gal/day
31-6 No. 1	Sec. 1, 30N, 6W Rio Arriba County	GW-118	5	4	500 gal/quarter	5	4	60 gal/day
32-7 No. 1	Sec. 34, 32N, 7W San Juan County	GW-117	4	---	---	2	1	15 gal/day
32-8 No. 2	Sec. 27, 32N, 8W San Juan County	GW-111	4	---	---	2	1	15 gal/day
32-8 No. 3	Sec. 9, 31N, 8W San Juan County	GW-116	4	2	250 gal/quarter	2	1	15 gal/day
Cedar Hill	Sec. 28, 32N, 10W San Juan County	GW-87	5	1	125 gal/quarter	3	3	45 gal/day
Horse Canyon	Sec. 27, 30N, 9W San Juan County	GW-61	14	---	---	9	1	15 gal/day
Middle Mesa	Sec. 10, 31N, 7W San Juan County	GW-64	7	---	---	4	3	45 gal/day
Pump Mesa	Sec. 14, 31N, 8W San Juan County	GW-63	6	6	750 gal/quarter	4	4	60 gal/day
Sims Mesa	Sec. 22, 30N, 7W Rio Arriba County	GW-68	7	---	---	5	1	15 gal/day

118

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111

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STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



June 19, 1992

BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

CERTIFIED MAIL  
RETURN RECEIPT NO. P-670-683-673

Mr. Robert Peacock  
Williams Field Services  
P.O. Box 58900, M.S. 10368  
Salt Lake City, Utah 84158-0900

RE: Discharge Plan GW-118  
San Juan 31-6 No. 1 C.D.P.  
San Juan County, New Mexico

Dear Mr. Peacock:

The groundwater discharge plan GW-118 for the Williams Field Services San Juan 31-6 No. 1 CDP Compressor Station located in the SW/4 SW/4, Section 1, Township 30 North, Range 6 West, NMPM, San Juan County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated April 24, 1992.

The discharge plan was submitted pursuant to Section 3-106 of the Water Quality Control Commission Regulations. It is approved pursuant to section 3-109.A. Please note Section 3-109.F., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

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

Please note that section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.c. you are required to notify the Director of any facility

Mr. Robert Peacock  
June 19, 1992  
Page -2-

expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.g.4., this plan approval is for a period of five years. This approval will expire June 19, 1997 and you should submit an application for renewal in ample time before that date.

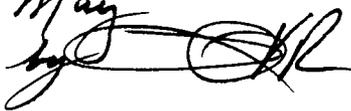
The discharge plan application for the Williams Field Services San Juan 31-6 No 1 C.D.P Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteen-hundred and eighty (1380) dollars for compressor stations with over 3000 Horsepower.

The OCD has received your \$50 filing fee. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

*William J. LeMay*  


William J. LeMay  
Director

WJL/rca

xc: OCD Aztec Office

ATTACHMENT TO DISCHARGE PLAN GW-118 APPROVAL  
WILLIAMS FIELD SERVICES SAN JUAN 31-6 NO 1 CDP COMPRESSOR STATION  
DISCHARGE PLAN REQUIREMENTS  
(June 19, 1992)

1. Payment of Discharge Plan Fees: The \$1380 flat fee (either total payment or installment) will be paid upon receipt of this approval.
2. Drum Storage: All drums will be stored on pad and curb type containment.
3. Sump Inspection: Any new sumps or below-grade tanks will be approved by the OCD prior to installation and will incorporate leak detection in their designs.