

**GW -** 129

**PERMITS,  
RENEWALS,  
& MODS  
Application**

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Susana Martinez**  
Governor

**John Bemis**  
Cabinet Secretary

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

**Jami Bailey**  
Division Director  
Oil Conservation Division



**AUGUST 28, 2012**

Mr. Matt Webre  
Williams Four Corners, LLC  
188 Country Road 4900  
Bloomfield, NM 87413

Dear Mr. Webre:

Based on your responses given to the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that two of your facilities with an expired or soon to be expired permit do not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit **GW - 287** (Snowshoe Straddle CS) and **GW - 129** (Crouch Mesa CS) are hereby rescinded and you are not required to proceed with the renewal of this expired or soon to expire WQCC Discharge Permit. OCD will close this permit in its database.

Because this WQCC Discharge Permit is no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste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 make an inspection of your facility to 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. If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

A handwritten signature in black ink, appearing to read "Jami Bailey".

**Jami Bailey**  
Director

JB/gvg



RECEIVED OCD

2012 APR 23 A 11: 31

Environmental Affairs  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4600  
505/632-4781 Fax

April 20, 2012

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

RE: Proof of Notification for Ownership Transfer of Existing Discharge Permit GW-129 at  
Crouch Mesa Compressor Station

Dear Mr. Lowe:

The purpose of this letter is to notify the New Mexico Oil Conservation Division (NMOCD) that Williams Four Corners, LLC (WFC) has provided the proper notification for transfer of operations for the Crouch Mesa Compressor Station under existing Water Quality Control Commission (WQCC) Discharge Permit GW-129 approved by the NMOCD. The Crouch Mesa Compressor Station is located in SE/4 NE/4 of Section 23, Township 29 North, and Range 12 West, San Juan County, New Mexico.

WFC is currently in the planning process of transferring operations of the station over to Chevron North America Exploration and Production (Chevron). WFC will begin removing equipment from the station on Monday, May 21, 2012 and Chevron is schedule to take over operations within approximately one week. Attached is a copy of the notification provided to Chevron as well as the proof of receipt as required per New Mexico Administrative Code (NMAC) 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.

Please contact me at (505) 632-4442 with any questions regarding this notification.

Sincerely,

Matt Webre, P.G.  
Environmental Specialist

Attachments

cc: Rusty Barker (WFC)

CERTIFIED MAIL 7011 1570 0002 2823 4481



Environmental Affairs  
188 County Road 4900  
Bloomfield, NM 87413  
505/632-4600  
505/632-4781 Fax

April 9, 2012

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Ms. Laura Clenney  
Chevron North America Exploration and Production  
Mid-Continent Business Unit  
322 Road 3100  
Aztec, New Mexico 87410

RE: Notification of Existing Discharge Permit GW-129 at Crouch Mesa Compressor Station

Dear Ms. Clenney:

The purpose of this letter is to notify Chevron North America Exploration and Production (Chevron) that Williams Four Corners, LLC (WFC) is currently operating the Crouch Mesa Compressor Station under existing Water Quality Control Commission (WQCC) Discharge Permit GW-129 approved by the New Mexico Oil Conservation Division (NMOCD). The Crouch Mesa Compressor Station is located in SE/4 NE/4 of Section 23, Township 29 North, and Range 12 West, San Juan County, New Mexico.

WFC is currently in the planning process of switching operations of the station over to Chevron. This notification is required per New Mexico Administrative Code (NMAC) 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. It should be noted that NMOCD is in the process of evaluating if existing discharge permits are required. WFC submitted an *Oil & Gas Questionnaire for Determination of a WQCC Discharge Permit* to the NMOCD on March 19, 2012. The NMOCD will use the information provided in the questionnaire to determine if the discharge permit will be required or rescinded for future operations. It is expected that the NMOCD will rescind the discharge permit in the near future based on the operations currently performed at the station. A copy of the submitted questionnaire for the Crouch Mesa Compressor Station is included as Attachment A.

Please contact Matt Webre at (505) 632-4442 with any questions regarding this notification.

Sincerely,

A handwritten signature in black ink, appearing to be "M. Webre", written over a horizontal line.

Matt Webre, P.G.  
Environmental Specialist

Attachments

cc: Leonard Lowe (NMOCD)  
Rusty Barker (WFC)

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**ATTACHMENT A**

**Oil & Gas Questionnaire for Determination of a WQCC Discharge Permit**

# 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



March 1, 2012

## Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit

Only Water Quality Control Commission-regulated systems will be incorporated into the OCD's WQCC Permits, while OCD regulated systems will be handled under separate permit(s). A current discharge permit is valid until its normal expiration date. All facilities with processes subject to the Water Quality Act must have permits in place by November 16, 2012. H2S Contingency Plans; pits, ponds, above and/or below-grade tanks; waste treatment, storage and disposal; and landfarms and landfills may require separate permitting under the OCD Oil, Gas, and Geothermal regulations.

*Please complete and submit a separate questionnaire for each facility within 30 days of your receipt of this form.*

### • Name of the owner or operator of the facility

Williams Four Corners, LLC

### • Point of contact

Name Matt Webre

Telephone 505-632-4442

Email matt.webre@williams.com

Mailing address 188 County Road 4900, Bloomfield, NM 87413

Facility name Crouch Mesa Compressor Station

### • Facility location

Unit Letter, Section, Township, Range SE/4 NE/4 Section 23, T29N, R12W

Latitude, Longitude (Decimal Degrees) \_\_\_\_\_

Street address (if any) San Juan County

### • Facility type

☐ Refinery

☐ Crude Oil Pump Station

☐ Geothermal Well

☐ Other describe) \_\_\_\_\_

☐ Gas Plant

☐ Injection Well

☒ Compressor Station

☐ Service Company

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>

• **Current and Past Operations** (please check all that apply)

- |   |   |                                     |
|---|---|-------------------------------------|
| <input type="checkbox"/> Impoundments   | <input type="checkbox"/> Treatment Plant          | <input type="checkbox"/> Waterflood |
| <input type="checkbox"/> Disposal Well  | <input type="checkbox"/> Brine Well               | <input type="checkbox"/> Wash Bay   |
| <input type="checkbox"/> Steam Cleaning | <input type="checkbox"/> Ground Water Remediation |                                     |

• **Facility Status**    ☒ Active    ☐ Idle    ☐ Closed

• **Does this facility currently have a discharge permit?**    ☒ Yes    ☐ No

If so, what is the permit number?    GW-129

• **Are there any routine activities at the facility which intentionally result in materials other than potable water being released either onto the ground or directly into surface or ground water?** (This includes process activities, equipment maintenance, or the cleanup of historic spills.)

☐ Yes    ☒ No

If so, describe those activities including the materials involved, the frequency of discharge, and the estimated volume per discharge event.

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• **What is the depth below surface to shallowest ground water in the area?**    >200 ft

• **Are there any water supply, ground water monitoring, or recovery wells at the facility?**

Water supply ☐    Monitoring ☐    Recovery ☐

If these wells are registered with the Office of the State Engineer (OSE), what are the OSE well numbers? \_\_\_\_\_

• **Are abatement actions ongoing?**    No

If so, please describe.

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• **Are there any active or inactive UIC wells present as part of the federal Underground Injection Control program associated with this facility?**    ☐ Yes    ☒ No

If so, what are the API numbers assigned to those wells?

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- Are there any sumps at the facility? ☐ Yes ☒ No

Number of sumps with volume less than 500 gallons \_\_\_\_\_

Use and contents \_\_\_\_\_

Is secondary containment incorporated into the design? ☐ Yes ☐ No

Number of sumps with volume greater than 500 gallons \_\_\_\_\_

Use and contents \_\_\_\_\_

Is secondary containment incorporated into the design? ☐ Yes ☐ No

- Does the facility incorporate any underground lines other than electrical conduits, freshwater, natural gas for heating, or sanitary sewers? ☒ Yes ☐ No

If so, what do those buried lines contain?

Natural gas and waste water (rain water/wash down water from  
equipment skid)

**THIS FORM IS DUE TO THE OIL CONSERVATION DIVISION WITHIN 30 DAYS OF  
YOUR RECEIPT OF THIS FORM.**

Questions? Please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

**JAMI BAILEY**  
Director



**SENDER: COMPLETE THIS SECTION**

- ☒ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- ☒ Print your name and address on the reverse so that we can return the card to you.
- ☒ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Laura Clenney  
Chevron N America E and P  
Mid-Continent Business Unit  
322 Road 3100  
Aztec, NM 87410

2. Article Number

(Transfer from service label)

7011 1570 0002 2823 4481

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *L. Clenney*☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

NM 87410

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

APR 10 2012

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

° Sender: Please print your name, address, and ZIP+4 in this box °

Williams Four Corners, LLC  
Environmental Department  
188 County Road 4900  
Bloomfield, NM 87413

WILLIAMS

APR 11 2012

FOUR CORNERS AREA  
FCA

603

**ATTACHMENT TO THE DISCHARGE PERMIT  
WILLIAMS FOUR CORNERS, LLC, Crouch Mesa COMPRESSOR STATION (GW-129)  
DISCHARGE PERMIT APPROVAL CONDITIONS  
NOVEMBER 26, 2007**

**Please remit a check for \$400.00 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 \$400.00 renewal permit fee for a gas compressor stations with 0 to 1000 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 November 25, 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 July 31, 2007 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-129  
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

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No.                      dated 12/14/07

or cash received on                      in the amount of \$ 400<sup>00</sup>

from Williams Four Corners

for GW-109

Submitted by: Laurence Fenech Date: 12/28/07

Submitted to ASD by: Laurence Fenech Date: 12/28/07

Received in ASD by:                                      Date:                     

Filing Fee            New Facility            Renewal           

Modification            Other                                     

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment            or Annual Increment



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 (Crouch Mesa CDP Station GW-129)
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 NE/4 Section 23 Township 29N Range 12W
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: *David Bays* Date: July 31, 2007  
E-Mail Address: david.bays@williams.com

**DISCHARGE PLAN RENEWAL**

**CROUCH MESA CDP COMPRESSOR STATION  
(GW-129)**

Williams Field Services Company

July 2007

**I. TYPE OF OPERATION**

The Crouch Mesa CDP Compressor Station was re-installed in 2001 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams Four Corners, LLC (WFC) System.

**II. LEGALLY RESPONSIBLE PARTY**

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

**Contact Person:**

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

**III. LOCATION OF FACILITY**

The Crouch Mesa CDP Compressor Station is located in Section 23, Township 29 North, Range 12 West, in San Juan County, New Mexico, approximately 4.5 miles west of Bloomfield, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangle: Horn Canyon, 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 one 114 hp engine. 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**  
**CROUCH MESA 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, dehydrator | 1000-4000 bbl/year         | No additives  |
| Waste Water                        | Compressor Skid                           | 500-1500 gal/year/engine   | Biodegradable Soap and tap water and rainwater w/traces of used oil |
| Used Process Filters               | Air, Inlet, Oil 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 microrentgens per hour. If affirmed, such materials will be handled and disposed in accordance with NMOCD NORM Regulations.

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

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

| PROCESS FLUID/WASTE                | STORAGE                   | CONTAINER CAPACITY (approximate) | CONTAINMENT/ SPILL PREVENTION  | RCRA STATUS        | DESCRIPTION OF FINAL DISPOSITION  |
|------------------------------------|---------------------------|----------------------------------|--|--------------------|---|
| Used Oil/<br>Waste Water           | Above Ground Storage Tank | 500 gallons                      | Berm   | Non-exempt         | Oil may be hauled to a WFC or contractor consolidation point before transport to EPA-registered used oil marketer for recycling. Water may be transported to NMOCD-approved facility; or evaporation at WFC facility may be considered in future.                   |
| Used Oil Filters                   | Drum or other container   | Varies                           | Transported to a WFC or contractor facility in drum or other container | Non-exempt         | Transported to a WFC 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 | 100 bbl                          | Berm   | Exempt             | Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.   |
| Used Process Filters               | Drum or other container   | Varies                           | Transported to a WFC or contractor facility in drum or other container | Exempt             | Transported to a WFC 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 WFC or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.   |
| Spill Residue (i.e., soil, gravel) | N/A                       | N/A                              | In situ treatment, land-farm, or alternate method                      | Incident dependent | Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.  |
| Used Absorbents                    | Drum or other container   | Varies                           | Transported to a WFC or contractor facility in drum or other container | Non-exempt         | Transported to a WFC 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. |
| Glycol                             | Above Ground Storage Tank | 55 gallons                       | Berm   | N/A                | Off-spec material recycled or disposed consistent with applicable regulations.  |
| Compressor Oil                     | Above Ground Storage Tank | 500 gallons                      | 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**

WFC's personnel will operate and maintain the compression unit at the facility. The facility will be remotely monitored for equipment malfunctions through WFC 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 WFC spill notification service. The service immediately notifies the WFC Environmental Department and all appropriate agencies.

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

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

WFC 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 Crouch Mesa CDP Compressor Station is located approximately 4.5 miles west of Bloomfield, New Mexico. The site elevation is approximately 5,650 feet above mean sea level. The natural ground surface topography slopes downward toward the south. The maximum relief over the site is approximately 10 feet. Intermittent flow from the site will follow natural drainage 0.8 miles to the south an unnamed wash. The wash drains to the south into San Juan River. The San Juan River, approximately 2 miles to the south of the site, is nearest down-gradient perennial source of surface water at an elevation of approximately 5,350 feet.

A review of the available hydrologic data<sup>1,2</sup> for this area revealed that there are no water wells within a one-half mile radius of the Crouch Mesa CDP Compressor Station. The water-bearing unit in the area is the Nacimiento Formation. 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 WFC choose to permanently close the facility. WFC 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.

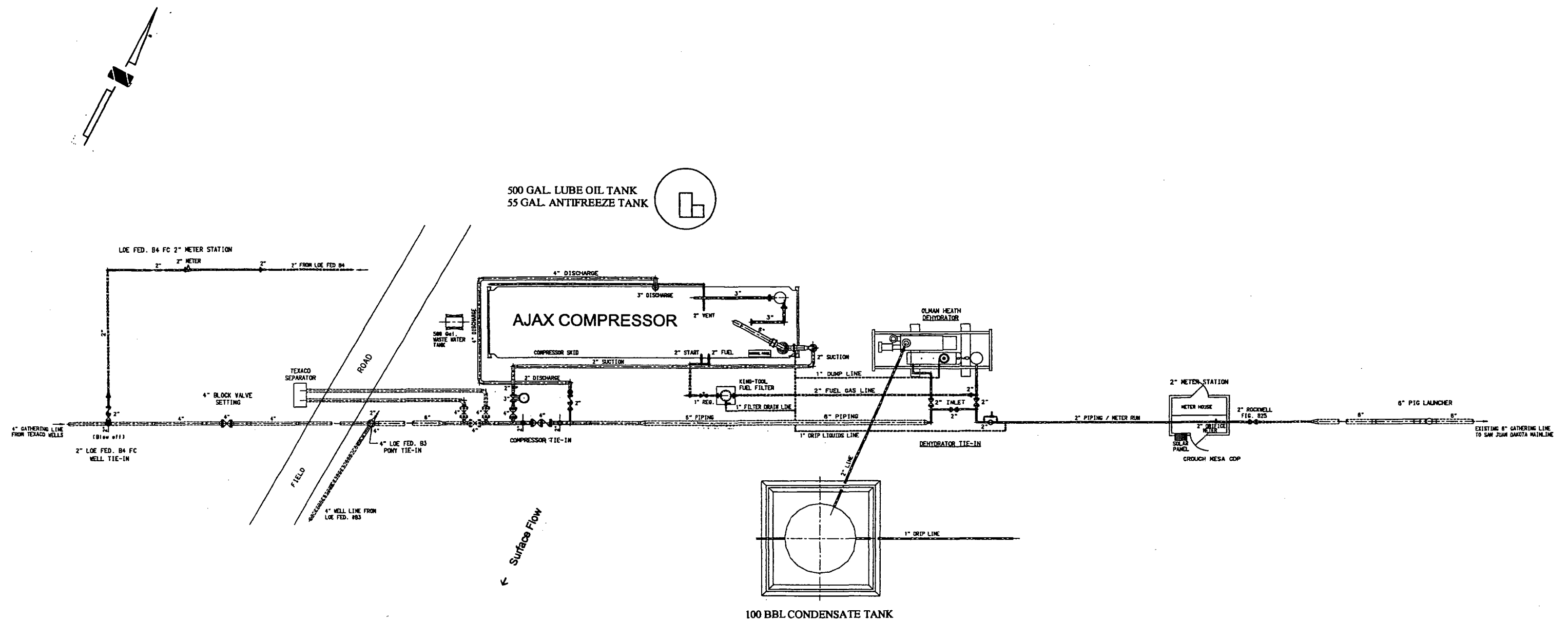
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.





*Williams.*

Figure 1 Site Vicinity / Topographic Map  
Crouch Mesa CDP Compressor Station  
Section 23, Township 29N Range 12W  
San Juan County, New Mexico



PRELIMINARY

LEGEND  
■ EMERGENCY SHUTDOWN STATION

[illegible]



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

July 25, 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 Crouch Mesa Central Delivery Point. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan application to the Oil Conservation Division during July 2007.

The facility, located in Section 23, Township 29 North, Range 12 West, San Juan County, New Mexico, approximately 4.5 miles west of Bloomfield, 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 a facility permitted by state, federal, or tribal agency to receive industrial solid waste. 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,

  
Monica Sandoval  
EH&S Specialist

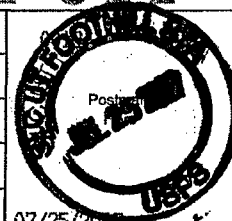
U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

FARMINGTON NM 87401

**OFFICIAL USE**

|   |         |
|---|---------|
| Postage   | \$ 0.41 |
| Certified Fee                                     | \$2.65  |
| Return Receipt Fee<br>(Endorsement Required)      | \$2.15  |
| Restricted Delivery Fee<br>(Endorsement Required) | \$0.00  |
| Total Postage & Fees                              | \$ 5.21 |



Sent To

Street, Apt. No.,  
or PO Box No.

City, State, ZIP+4

PS Form 3800, August 2006

See Reverse for Instructions

7006 3450 0003 7354 2119

BLM  
1235 N. La Plata  
Farmington, NM 87401

ATTACHMENT TO THE DISCHARGE PLAN GW-129  
WILLIAMS FIELD SERVICES COMPANY  
CROUCH MESA CDP COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(April 21, 2003)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. The \$400.00 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 Company Commitments: Williams Field Services Company will abide by all commitments submitted in the discharge plan renewal application dated March 19, 2003 and these stipulations for renewal.
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 characterization per 40 CFR Part 261.
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 at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees 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: 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. All 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. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans that are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. 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 weekly 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: Williams Field Services Company shall maintain storm water runoff controls. As a result of Williams Field Services Company's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services Company shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Williams Field Services Company shall also take immediate corrective actions pursuant to Item 12 of these conditions.

16. Closure: The OCD will be notified when operations of the Crouch Mesa CDP Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Crouch Mesa 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 Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services Company 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 COMPANY

by   
Title

Environmental Specialist  
Michael K. Lane

I hereby acknowledge receipt of check No [REDACTED] dated 3/14/03.

from Williams Field Services

for See attached

Submitted by: W. J. J. J. J. Date: 3/21/03

Submitted to ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee ✓ New Facility      Renewal ✓

Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment

38035



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

March 19, 2003

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

**Re: Discharge Plan GW- Application Renewal and Filing Fee**

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application renewal and check number 3500002622 for \$600.00 to cover the filling fee for the following Williams Field Services (WFS) Compressor Stations:

- 30-8 CDP (GW-133)
- Aztec CDP (GW-155)
- Crouch Mesa CDP (GW-129)
- Decker Junction CS (GW-134)
- Kutz Canyon Plant (GW-045)
- Trunk N CS (GW-306)

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 505/632/4606.

Thank you,

A handwritten signature in cursive script, appearing to read "Clara M Garcia", followed by a horizontal line.

Clara M Garcia  
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III



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

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Compressor Station (Crouch Mesa CDP Compressor Station GW-129)

2. Operator: Williams Field Services Company

Address: 188 CR 4900, Bloomfield, New Mexico 87413

Contact Person: Michael K. Lane

Phone: (505) 632-4625

3. Location: SE/4 NE/4 Section 23 Township 29 North Range 12 West

Submit large scale topographic map showing exact location.

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

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

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

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

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

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

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

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

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

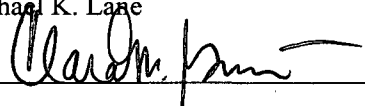
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

14. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Michael K. Lane

Title: Environmental Specialist III

Signature:  for

Date: March 19, 2003

**DISCHARGE PLAN RENEWAL**

**CROUCH MESA CDP COMPRESSOR STATION  
(GW-129)**

Williams Field Services Company

January 2003

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Appendix C – Public Notice

**I. TYPE OF OPERATION**

The Crouch Mesa CDP Compressor Station was re-installed in 2001 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams Field Services (WFS) System.

**II. LEGALLY RESPONSIBLE PARTY**

Williams Field Services  
188 CR 4900  
Bloomfield, NM 87413  
(505) 632-4625

**Contact Person:**

Michael K. Lane, Senior Environmental Specialist  
Phone and Address, Same as Above

**III. LOCATION OF FACILITY**

The Crouch Mesa CDP Compressor Station is located in Section 23, Township 29 North, Range 12 West, in San Juan County, New Mexico, approximately 4.5 miles west of Bloomfield, New Mexico. A site location map is attached (USGS 7.5 Min. Quadrangle: Horn Canyon, 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 one 114 hp engine. 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**  
**CROUCH MESA CDP COMPRESSOR STATION**

| PROCESS<br>FLUID/WASTE                | SOURCE                                       | QUANTITY<br>(Ranges)          | QUALITY   |
|---------------------------------------|--|-------------------------------|---|
| Used Oil                              | Compressor                                   | 1000-2000<br>gal/year/engine. | Used motor oil w/no<br>additives  |
| Used Oil Filters                      | Compressor                                   | 50-100 filters/year/engine    | No additives  |
| Natural Gas<br>Condensate             | Scrubber, Gas Inlet<br>Separator, dehydrator | 1000-4000 bbl/year            | No additives  |
| Waste Water                           | Compressor Skid                              | 500-1500 gal/year/engine      | Biodegradable Soap and tap<br>water and rainwater w/traces<br>of used oil |
| Used Process Filters                  | Air, Inlet and Fuel Gas                      | 75- 100/year                  | No additives  |
| Empty Drums /<br>Containers           | Liquid Containers                            | 10-20/year                    | No additives  |
| Spill Residue<br>(i.e., gravel, soil) | Incidental spills                            | Incident dependent            | Incident dependent  |
| Used Absorbents                       | Incidental spill/leak<br>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**  
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| PROCESS FLUID/WASTE                | STORAGE                   | CONTAINER CAPACITY (approximate) | CONTAINMENT/ SPILL PREVENTION  | RCRA STATUS        | DESCRIPTION OF FINAL DISPOSITION  |
|------------------------------------|---------------------------|----------------------------------|--|--------------------|---|
| Used Oil/<br>Waste Water           | Above Ground Storage Tank | 500 gallons                      | Berm   | Non-exempt         | Oil may be hauled to a WFS or contractor consolidation point before transport to EPA-registered used oil marketer for recycling. Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered in future.                   |
| 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 | 100 bbl                          | Berm   | Exempt             | Saleable liquids may be sold to refinery or liquid may be disposed at NMOCD- approved facility.   |
| 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 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.  |
| Used Absorbents                    | Drum or other container   | Varies                           | Transported to a WFS or contractor facility in drum or other container | Non-exempt         | Transported to a WFS or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available. |
| Glycol                             | Above Ground Storage Tank | 55 gallons                       | Berm   | N/A                | Off-spec material recycled or disposed consistent with applicable regulations.  |
| Compressor Oil                     | Above Ground Storage Tank | 500 gallons                      | 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 WFS 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. 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 Crouch Mesa CDP Compressor Station is located approximately 4.5 miles west of Bloomfield, New Mexico. The site elevation is approximately 5,650 feet above mean sea level. The natural ground surface topography slopes downward toward the south. The maximum relief over the site is approximately 10 feet. Intermittent flow from the site will follow natural drainage 0.8 miles to the south an unnamed wash. The wash drains to the south into San Juan River. The San Juan River, approximately 2 miles to the south of the site, is nearest down-gradient perennial source of surface water at an elevation of approximately 5,350 feet.

A review of the available hydrologic data<sup>1,2</sup> for this area revealed that there are no water wells within a one-half mile radius of the Crouch Mesa CDP Compressor Station. The water-bearing unit in the area is the Nacimiento Formation. 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.

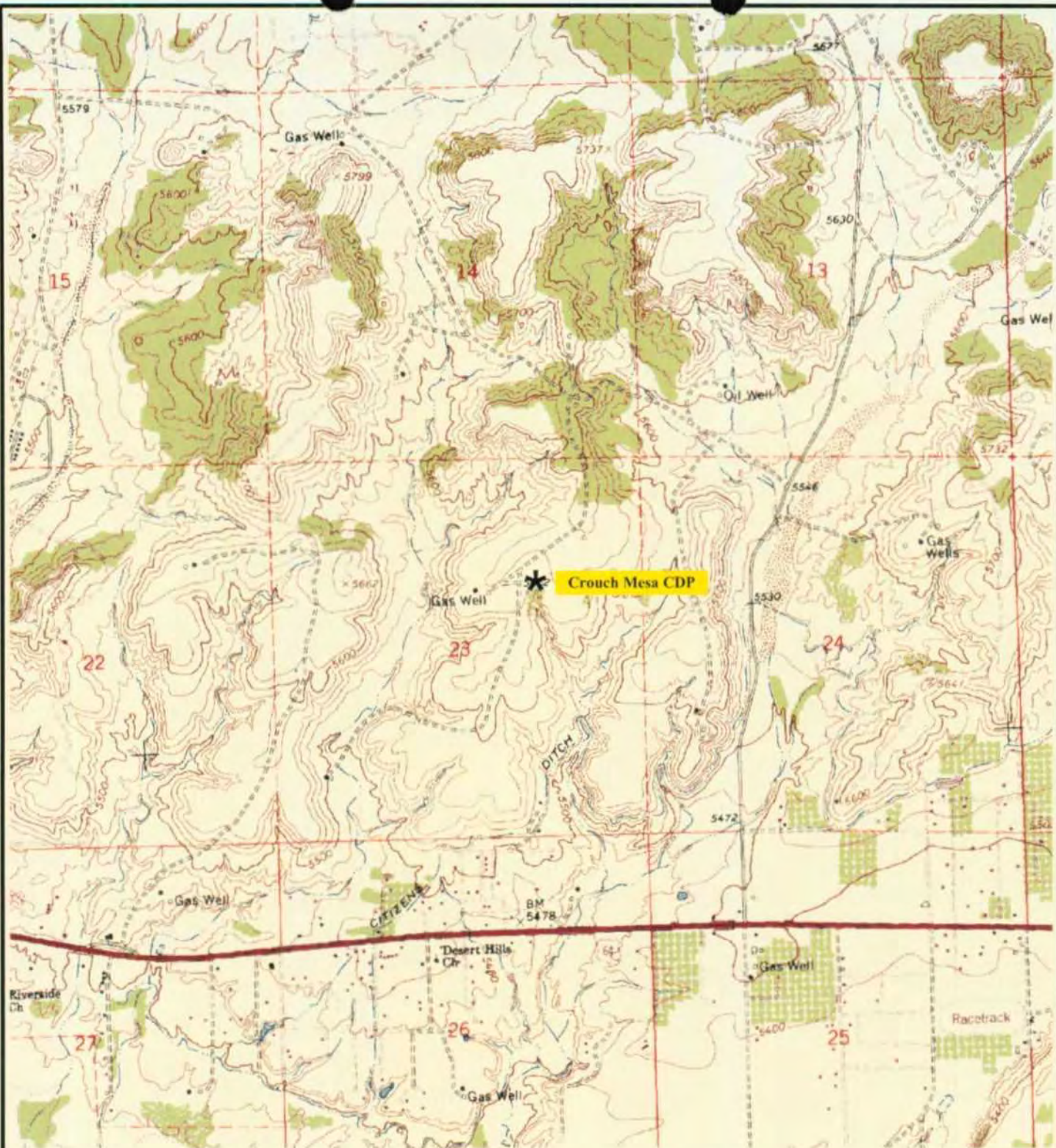
Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

**FIGURE 1**

**SITE VICINITY / TOPOGRAPHIC MAP**

**FIGURE 2**

**SITE PLAN**



Source: USGS Horn Canyon, New Mexico Quadrangle

0 2000  
Scale (Feet)



**Figure 1 Site Vicinity / Topographic Map**  
**Crouch Mesa CDP Compressor Station**  
 Section 23, Township 29N Range 12W  
 San Juan County, New Mexico

EMERGENCY SHUTDOWN SYSTEM

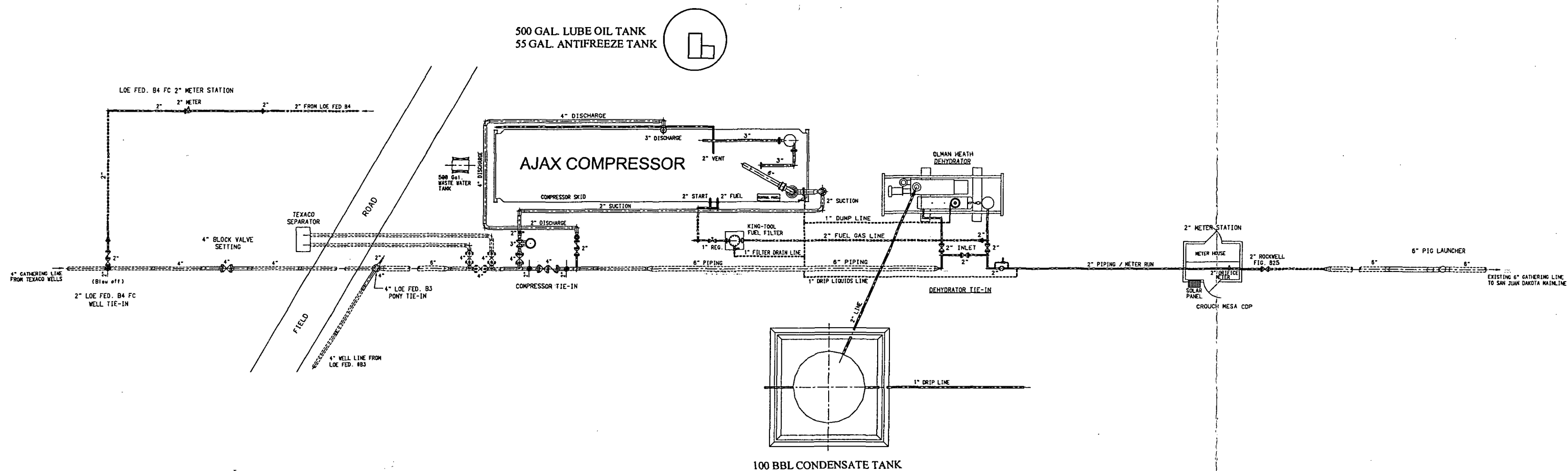
## OPERATIONS

Manual CROUCH MESA COMPRESSOR STATION

|         |                           |
|---------|---------------------------|
| Section | EMERGENCY SHUTDOWN SYSTEM |
|---------|---------------------------|

|          |    |
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### LEGEND

■ EMERGENCY SHUTDOWN STATION


PRELIMINARY

[illegible]



## **APPENDIX A**

### **SPILL CONTROL PROCEDURES**

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

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## ► Document History (ISO9001)

## ▼ Document Body

### 1.0 PURPOSE AND SCOPE

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

### 2.0 CONTENTS

### 3.0 POLICY

#### 3.1 GENERAL

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

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

a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act

c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)

d. Section 112 of the Clean Air Act

e. Section 7 of the Toxic Substance Control Act

3.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

3.1.5 Facilities which could discharge or spill, oil or hazardous substances into a watercourse must comply with the applicable federal, state or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake or standing body of water capable of collecting or transporting an oil or hazardous substance.

3.1.6 Facilities which are subject to the requirements stated in this policy are as follows:

a. Non-Transportation Related Facilities

(1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.

(2) Underground storage facilities having a total capacity in excess of 42,000 gallons.

b. Transportation Related Facilities

(1) All vehicles, pipeline facilities, loading/unloading facilities and other mobile facilities which transport oil or hazardous substances.

3.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all oil and hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.

3.1.8 The facility superintendent is responsible for spill prevention. His/her duties include,

but are not limited to, the following:

- a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
- b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
- c. Briefings should highlight and describe known discharges or spills and recently developed precautionary measures.

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

- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.
- b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
- c. An annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.

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

## 3.2 BULK STORAGE TANKS

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

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

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

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



### **3.3 FACILITY DRAINAGE**

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

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

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

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

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

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

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

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

**3.3.5**

a. Berms or retaining walls

b. Curbing

c. Culverting, gutters or other drainage systems

d. Weirs, booms or other barriers

e. Spill diversion ponds or retention ponds

f. Sorbent materials

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

**3.4.1** Aboveground valves and pipelines should be examined regularly by operating

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

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

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

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

## **4.0 PROCEDURE**

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

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

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

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

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

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

- Ammonia
- Antifreeze
- Amine

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

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

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

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

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

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

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

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

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

**Gas Control Personnel**

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

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

- 4.1.4 If Environmental Affairs cannot be contacted, notifies Director over Environmental Affairs.  
**Facility Superintendent**
- 4.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.
- 4.1.6 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed. If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).
- 4.1.7 Advises Environmental Affairs by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.  
**Environmental Affairs**
- 4.1.8 Assesses reporting requirements to state and federal agencies (contacts Legal Department and Right-of-Way Department, if appropriate). (See Emergency Operating Procedure Manuals).
- 4.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.
- 4.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

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

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

e. Area affected

f. Cause of spill

g. Special circumstances

h. Corrective measures taken

i. Description of repairs made

j. Preventative measures taken to prevent recurrence.

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

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

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

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

|   |  |
|---|--|
|   | <p>3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</p> <p><b>Note:</b> Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.</p> |
| C. Bulk Storage Tanks or any other Facilities | <p>1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam or burning.</p> <p>2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.</p>   |

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## **APPENDIX B**

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

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

State of New Mexico  
Energy Minerals and Natural Resources

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

Form C-141  
Revised March 17, 1999

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

|                 |  |                                    |
|-----------------|--|------------------------------------|
| Name of Company | Contact <input type="checkbox"/>       |                                    |
| Address         | Telephone No. <input type="checkbox"/> |                                    |
| Facility Name   | Facility Type <input type="checkbox"/> |                                    |
| Surface Owner   | Mineral Owner                          | Lease No. <input type="checkbox"/> |

LOCATION OF RELEASE

|             |         |          |       |               |                  |               |                |                                 |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|---------------------------------|
| Unit Letter | Section | Township | Range | Feet from the | North/South Line | Feet from the | East/West Line | County <input type="checkbox"/> |
|-------------|---------|----------|-------|---------------|------------------|---------------|----------------|---------------------------------|

NATURE OF RELEASE

|   |   |   |
|---|---|---|
| Type of Release   | Volume of Release                         | Volume Recovered <input type="checkbox"/>           |
| Source of Release   | Date and Hour of Occurrence               | Date and Hour of Discovery <input type="checkbox"/> |
| Was Immediate Notice Given?<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required | If YES, To Whom?                          |   |
| By Whom? <input type="checkbox"/>   | Date and Hour <input type="checkbox"/>    |   |
| Was a Watercourse Reached?<br><input type="checkbox"/> Yes <input type="checkbox"/> No  | If YES, Volume Impacting the Watercourse. |   |

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

Describe Area Affected and Cleanup Action Taken.\*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

|               |                |   |                                   |
|---------------|----------------|---|-----------------------------------|
| Signature:    |                | <u>OIL CONSERVATION DIVISION</u>                          |                                   |
|               |                | Approved by <input type="checkbox"/> District Supervisor: |                                   |
| Printed Name: |                |   |                                   |
| Title:        | Approval Date: | Expiration Date:  |                                   |
| Date:         | Phone:         | Conditions of Approval:                                   | Attached <input type="checkbox"/> |

\* Attach Additional Sheets If Necessary



**APPENDIX C**  
**PUBLIC NOTICE**



Four Corners Area  
Environmental Department  
#188 County Road 4900  
Bloomfield, N.M. 87413  
Phone: (505) 632-4606  
Fax: (505) 632-4781

February 5, 2003

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**70022410000008047216**

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Crouch Mesa Compressor Station (GW-129). 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 2003.

The facility, located in Section 23, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, 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 with secondary containment. 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 because the estimated ground water depth at the site is greater than 50 feet. The total dissolved solids concentration of area ground water is expected to range from 200 to 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 M. Garcia  
Environmental Compliance

COPY

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

*x Virginia Barber*☐ Agent☐ Addressee

B. Received by (Printed Name)

*Virginia Barber, BLM*

C. Date of Delivery

*2/6/03*

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7002 2410 0000 0804 7216

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

ATTACHMENT TO THE DISCHARGE PLAN GW-129 RENEWAL  
WILLIAMS FIELD SERVICES  
CROUCH MESA COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(November 6, 1997)

1. Payment of Discharge Plan Renewal Fees: The \$50.00 filing fee has been received. A flat fee for compressor stations is not required for installations of less than 1,000 horsepower.
2. Williams Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated July 25, 1997.
3. Waste Disposal: All wastes shall 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 by characteristics may be disposed of at an OCD 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 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 facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
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 should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

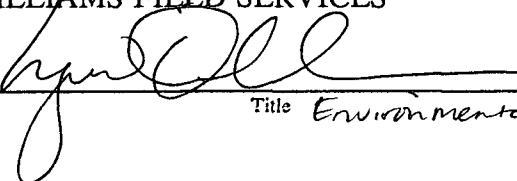
9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual 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 at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees 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: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.
12. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.
13. Spill Reporting: All spills/releases shall 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. 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.

16. 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 *Environmental Specialist*



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



BRUCE KING  
GOVERNOR  
ANITA LOCKWOOD  
CABINET SECRETARY

December 1, 1992

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

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-667-241-881**

Mr. Sam Mohler  
Compressor Operations Supervisor  
Gas Company of New Mexico  
P.O. Box 1899  
Bloomfield, New Mexico 87413

**Re: Discharge Plan GW-129  
Crouch Mesa Compressor Station  
San Juan County, New Mexico**

Dear Mr. Mohler:

The groundwater discharge plan GW-129 for the Gas Company of New Mexico Crouch Mesa Compressor Station located in the NE/4 NE/4, Section 23, Township 29 North, Range 12 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 August 21, 1992.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations and is approved pursuant to Section 3-109.A.. Please note Section 3-109.F. provides for possible future amendments or modifications of the plan. Please note that Section 3-104 of the regulations require 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 expansion, production increase, or process modifications 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 (5) years. This approval will expire November 25, 1997 and you should submit an application for renewal in ample time before that date.

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. Sam Mohler

December 1, 1992

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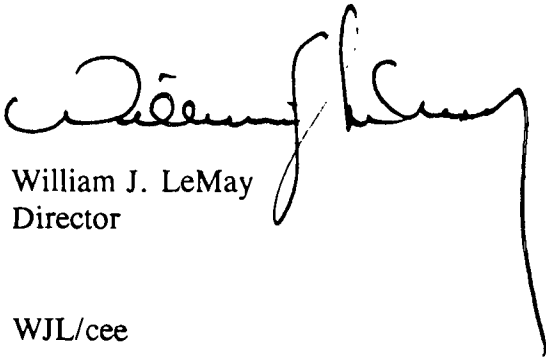
Please note that approval of this plan does not relieve you of liability should your operation result in pollution of surface water, ground water, or the environment which may be actionable under other laws and/or regulations.

The discharge plan application for the Gas Company of New Mexico Crouch Mesa 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 a flat rate based on the type of facility.

The OCD has received your \$50 filing fee. The flat fee for a discharge plan for a compressor station of less than 1000 hp is \$0.00.

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,

A handwritten signature in dark ink, appearing to read 'William J. LeMay', with a long, sweeping vertical line extending downwards from the end of the signature.

William J. LeMay  
Director

WJL/cee

xc: Mike Williams, OCD Artesia District



ATTACHMENT TO THE DISCHARGE PLAN GW-128 APPROVAL  
GAS COMPANY OF NEW MEXICO CROUCH MESA COMPRESSOR STATION  
DISCHARGE PLAN REQUIREMENTS  
(November 25, 1992)

1. Drum Storage: All drums will be stored on pad and curb type containment.
2. Sump Inspection: All pre-existing sumps at this facility will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will be approved by the OCD prior to installation and will incorporate leak detection in their designs.
3. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
4. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.