

GW - 180

**GENERAL
CORRESPONDENCE**

YEAR(S):

2006-1994

RECEIVED

2007 NOV 13 AM 11 55



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

November 7, 2007

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

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

Dear Mr. Lowe,

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

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

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

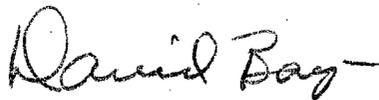
Please see the attached Table 1 and Table 2, from the recent OCD Discharge Plan renewal application for Williams' Rosa Compressor Station, for an example of how the updates apply at a typical Williams' facility. The updated information is indicated by bold text. We will update this information in each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

Five Points (GW-078)
29-6#2 (GW-121)
29-6#3 (GW-198)
29-6#4 (GS-122)
30-5 (GW-108)
31-6 (GW-118)
32-7 (GW-117)
32-8#2 (GW-111)
32-8#3 (GW-116)
32-9 (GW-091)
Aztec (GW-155)
Blanco (GW-327)
Cabresto (GW-352)
Carracas (GW-112)
Cedar Hill (GW-087)
Chaco (GW-331)
Coyote (GW-250)
Crouch Mesa (GW-129)
Culpepper (GW-353)
Decker Junction (GW-134)
Dogie (GW-330)
El Cedro (GW-149)
Glade (GW-321)
Hare (GW-343)
Honolulu (GW-315)
Horse Canyon (GW-061)
Horton (GW-323)
Kernaghan (GW-271)

La Cosa (GW-187)
Laguna Seca (GW-307)
La Jara (GW-223)
Lateral N-30 (GW-256)
Lawson Straddle (GW-322)
Lybrook (GW-047)
Manzanares (GW-062)
Martinez (GW-308)
Middle Mesa (GW-064)
Milagro (GW-060)
Navajo (GW-182)
North Crandell (GW-310)
Pipkin (GW-120)
Pritchard (GW-274)
Pump Mesa (GW-063)
Quintana Mesa (GW-309)
Richardson (GW-320)
Sims Mesa (GW-068)
Snowshoe (GW-287)
Thompson (GW-328)
Trunk A (GW-248)
Trunk B (GW-249)
Trunk C (GW-257)
Trunk L (GW-180)
Trunk M (GW-181)
Trunk N (GW-306)
Wildhorse (GW-079)

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

Respectfully submitted,



David Bays
Senior Environmental Specialist

Attachment

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

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

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

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

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

2006 AUG 23 AM 11 44



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

August 22, 2006

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

Re: Change of Company Name

Dear Mr. Price;

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

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

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

Sincerely,

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

David Bays
Senior Environmental Specialist

Attachments

xc: Clara Cardoza
Monica Sandoval
WFS FCA file 210

**WILLIAMS FIELD SERVICES COMPANY**PO Box 21218
Tulsa, OK 74121-1218
Customer Support 1-866-778-2665

CHECK NUMBER	PAY DATE	SUPPLIER NO.	SUPPLIER NAME	TOTAL AMOUNT
	07/22/2005	403816	NEW MEXICO OIL CONSERVATION DIV	*****1,700.00

INVOICE NUMBER	INV. DATE	INVOICE DESCRIPTION	NET AMOUNT
21-JUL-2005	20050721	DISCHARGE PERMIT RENEWAL GW-180 TRUNK K COMP STN P	1,700.00



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

July 25, 2005

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

**Re: Discharge Permit Renewal GW-180
Trunk L Compressor Station**

Dear Mr. Ford:

Enclosed please find copies of Discharge Permit Renewal and check number 4027005645 for \$1,700.00 flat fee for the Williams Field Services (WFS) Trunk L Compressor Station.

Williams Field Services appreciates your assistance in handling this renewal and fees. If you have any questions or require additional information, please contact me at 505/632/4625.

Thank you, -

Monica Sandoval
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

2005 JUL 27 AM 9:59

AFFIDAVIT OF PUBLICATION

Ad No. 51659

**STATE OF NEW MEXICO
County of San Juan:**

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

Thursday, May 12, 2005.

And the cost of the publication is \$82.21.

Connie Pruitt

ON 5/13/05 CONNIE PRUITT
appeared before me, whom I know personally
to be the person who signed the above
document.

Wynell Corey
My Commission Expires November 17, 2008.



COPY OF PUBLICATION

918

Legals

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-180) - Williams Field Service, Clara Garcia, Environmental Compliance, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Trunk L compressor station located in the NW/4 SW/4, Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 barrels per day of produced water and waste water with a total dissolved solids concentration in excess of 2000 mg/l is stored in above ground, closed-top steel tanks prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentration of approximately 2000 mg/l. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

(GW-181) - Williams Field Service, Clara Garcia, Environmental Compliance, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their Trunk M compressor station located in the SE/4 NE/4, Section 29, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentration of approximately 2000 mg/l. The discharge permit addresses how oilfield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The OCD proposed conditions can be viewed at www.emnrd.state.nm.us/ocd in the Draft Discharge Permit for this facility.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 9th day of May 2005.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

MARKFEISMIER, P.E., Director

Legal No. 51659 published in The Daily Times, Farmington, New Mexico on Thursday, May 12, 2005.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

April 4, 2005

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

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

**RE: Discharge Permit Renewal GW-180
Williams Field Services, Inc.
Trunk L Compressor Station
Rio Arriba County, New Mexico**

Dear Ms. Garcia:

The ground water discharge permit renewal application GW-180 for the Williams Field Services, Inc. Trunk L Compressor Station located in the NW/4 SW/4 of Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge permit application was submitted on November 8, 1994 and approved February 21, 1995. The discharge permit renewal application letter, dated February 7, 2005, submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge permit is renewed pursuant to 20 NMAC 3106.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provides for possible future amendment or modifications of the permit. Please be advised that approval of this permit does not relieve Williams Field Services, Inc. of liability should operations result in pollution of surface water, ground water, or the environment.

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

Please note that 20 NMAC 3104 of the regulations provides: "When a permit has been approved, discharges must be consistent with the terms and conditions of the permit." Pursuant to 20 NMAC 3107.C., Williams Field Services, Inc. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

water quality or volume.

Ms. Clara Garcia

GW-180 Trunk L Compressor Station

April 4, 2005

Page 2

Pursuant to 20 NMAC 3109.G.4., this renewal permit is for a period of five years. This renewal will expire on **February 21, 2010**, and Williams Field Services, Inc. should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge 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. It should be noted that all discharge permit facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge permit .

Williams Field Services, Inc. will submit a storm water run-off permit for approval by the OCD within six (6) months of the date of this approval letter for the Trunk L Compressor Station facility.

The discharge permit renewal application for the Williams Field Services, Inc. Trunk L Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit application will be assessed a fee equal to the filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 1001 horsepower equal to \$1,700.00. The OCD has received the filing fee.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-180
WILLIAMS FIELD SERVICES, INC.
TRUNK L COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(April 4, 2005)

1. Payment of Discharge Permit Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$1,700.00 for compressor station facilities with horsepower rating over 1001 horsepower. The renewal flat fee required for this facility may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge permit, 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 permit renewal application dated February 2, 2005 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste 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 a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: 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 permit approved by the Division's Santa Fe Office. The OCD allows industry to submit closure permits which are protective of fresh waters, public health and the environment, 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 Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Permit: Williams Field Services Company shall maintain storm water runoff controls. As a result of BP America Production 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 permit 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 Trunk L Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk L Compressor Station a closure permit 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



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

July 12, 2004

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

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

RE: Discharge Plan Renewal Notice for Williams Field Services Facilities

Dear Mr. Lane:

The OCD is providing Williams Field Services a notice that the following discharge plans expire at various dates during the of the first quarter of 2005.

GW-315 expires 1/3/2005 – Honolulu Compressor Station
GW-169 expires 1/4/2005 – La Maquina Gas Plant
GW-182 expires 2/21/2005 – Navajo CDP Compressor Station
GW-181 expires 2/21/2005 - Trunk M Compressor Station
GW-180 expires 2/21/2005 - Trunk L Compressor Station

WQCC 20.6.2.3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 20.6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00 plus a flat fee based upon the horsepower rating or type of facility for gas processing facilities. The \$100.00 filing fee for each facility is to be submitted with the discharge plan renewal application and is nonrefundable.

Mr. Michael Lane
July 12, 2004
Page 2

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

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

Sincerely,



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

cc: OCD Aztec District Office



Williams Energy Services-Enve
 188 CR 4900
 Bloomfield, NM 87413
 505/632-4606
 505/632-4781 Fax

OCT 27 2003

October 23, 2003

Mr. Jack Ford
 Oil Conservation Division
 1220 South St Francis Dr
 Santa Fe NM 87505

Re: Drain Line Testing Results at Various Williams Field Services Facilities

Dear Mr. Ford:

Williams Field Services conducted a facility review and drain line testing in accordance to the Oil Conservation Division Discharge Plan requirements. Subsurface, non-pressurized process and wastewater lines were tested. The facility drain line testing reports are enclosed with this letter. A review and testing summary is provided in the table below.

Facility	Permit #	Completion Date	Results	Comments
29-6 #2 CDP	GW-112	10/9/2003	Passed	
30-8 CDP	GW-133	8/12/2003	Passed	facility broke up into 2 test sections, both passed
31-6 CDP	GW-118	9/17/2003	Passed	Both WFS and WPX sides passed
32-7 CDP	GW-117	7/29/2003	Passed	facility broke up into 3 test sections, both passed
32-8 #3 CDP	GW-116	7/8/2003	Passed	
Aztec CDP	GW-155	8/18/2003	Passed	facility broke up into 3 test sections, both passed
Carracas CDP	GW-112	8/7/2003	Passed	
Decker Junction	GW-134	8/13/2003	Passed	
Rosa #1CS	GW-292	12/10/2002	Passed	
Sims Mesa CDP	GW-68	9/30/2003	Passed	facility broke up into 2 test sections, both passed
Snowshoe CS	GW-287	11/8/2002	Passed	
Trunk A CDP	GW-248	12/16/2002	Passed	
Trunk L CDP	GW-180	10/17/2003	Passed	
Trunk N CDP	GW-306	7/17/2003	Passed	

If you have any questions or require additional information, please contact me at (505) 632-4606.

Respectfully Submitted,

Clara M. Garcia
 Environmental Compliance

Attachments: Drain Line Testing Reports

cc: FCA Environmental 220 File
 Denny Foust, OCD Aztec

Environmental Waste Water Line
Test Report



LOCATION: <u>Trunk L CDP</u>
DATE: <u>10-17-03</u>
Sec, Range and Township <u>Sec. 22 T28N R5W</u>

START OF WATER FILL:	DATE: <u>10-16-03</u>	TIME: <u>11:30 AM</u>
START OF TEST PERIOD:	DATE: <u>10-17-03</u>	TIME: <u>8:30 AM</u>
END OF TEST PERIOD:	DATE: <u>10-17-03</u>	TIME: <u>9:30 AM</u>

- TEST DATA:
1. Water height by manual measurement at the datum.
 2. Test to commence when maximum fill is reached and first manual measurement is recorded.
 3. Test time 1 hour at 3lbs

No.	Time	Water Height	Remarks:
1	8:30 AM	9' 1"	Holding
2	8:35	9' 1"	
3	8:40	9' 1"	
4	8:45	9' 1"	
5	8:55	9' 1"	
6	9:00	9' 1"	
7	9:10	9' 1"	
8	9:20	9' 1"	
9	9:25	9' 1"	
10	9:30	9' 1"	test Held

Additional Remarks:
Note This Comp. Site has two waste water systems. This test is on the Lower System in the West end of Site

TEST IS: ACCEPTED REJECTED

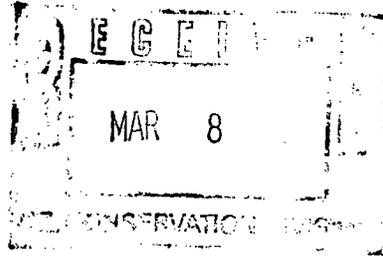
RECORDED BY: GARY Cole Lyck Sunhand
(TEST Contractor)

VERIFIED BY: WWSMh
(LOCATION SUPERVISOR)

APPROVED BY: Bryant Pounds
(Test Inspector)



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



March 7, 2001

180

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

Re: Storm Water Management Plans

Dear Mr. Ford:

Enclosed please find copies of Storm Water Management Plans for La Cosa, Trunk M, Trunk L as request by the OCD with the previous submittal for renewal of discharge plans for these stations.

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

Thank you,

Clara M Garcia
Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

STORM WATER MANAGEMENT PLAN

TRUNK L COMPRESSOR STATION

Williams Field Services Company

March 2001

Table of Contents

I.	Purpose and Scope-----	1
II.	Type of Operation -----	1
III.	Legally Responsible Party-----	1
IV.	Location of Facility-----	1
V.	Facility Description-----	1
VI.	Storm Water Plan -----	1

List of Figures - All figures follow Section VI

Figure 1 - Site Vicinity Map

Figure 2 - Facility Plot Plan

I. PURPOSE AND SCOPE

The purpose is to establish a Storm Water Management 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).

II. TYPE OF OPERATION

The Trunk L Compressor Station was built to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through Williams Field Services (WFS) Ignacio Plant.

III. LEGALLY RESPONSIBLE PARTY

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

Contact Person:

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

IV. LOCATION OF FACILITY

The Trunk L Compressor Station is located in the Section 22, Township 28 North, Range 5 West, in Rio Arriba County, New Mexico. A site location map is attached as Figure 1. The facility layout is illustrated in Figure 2. All figures are attached following Section VI of the text.

V. FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. The air permit for this site allows the operation of six 900-hp skid-mounted, self-contained, natural gas fired lean-burned compressor units. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

VI. STORM WATER MANAGEMENT

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.

FIGURE 1
SITE VICINITY MAP

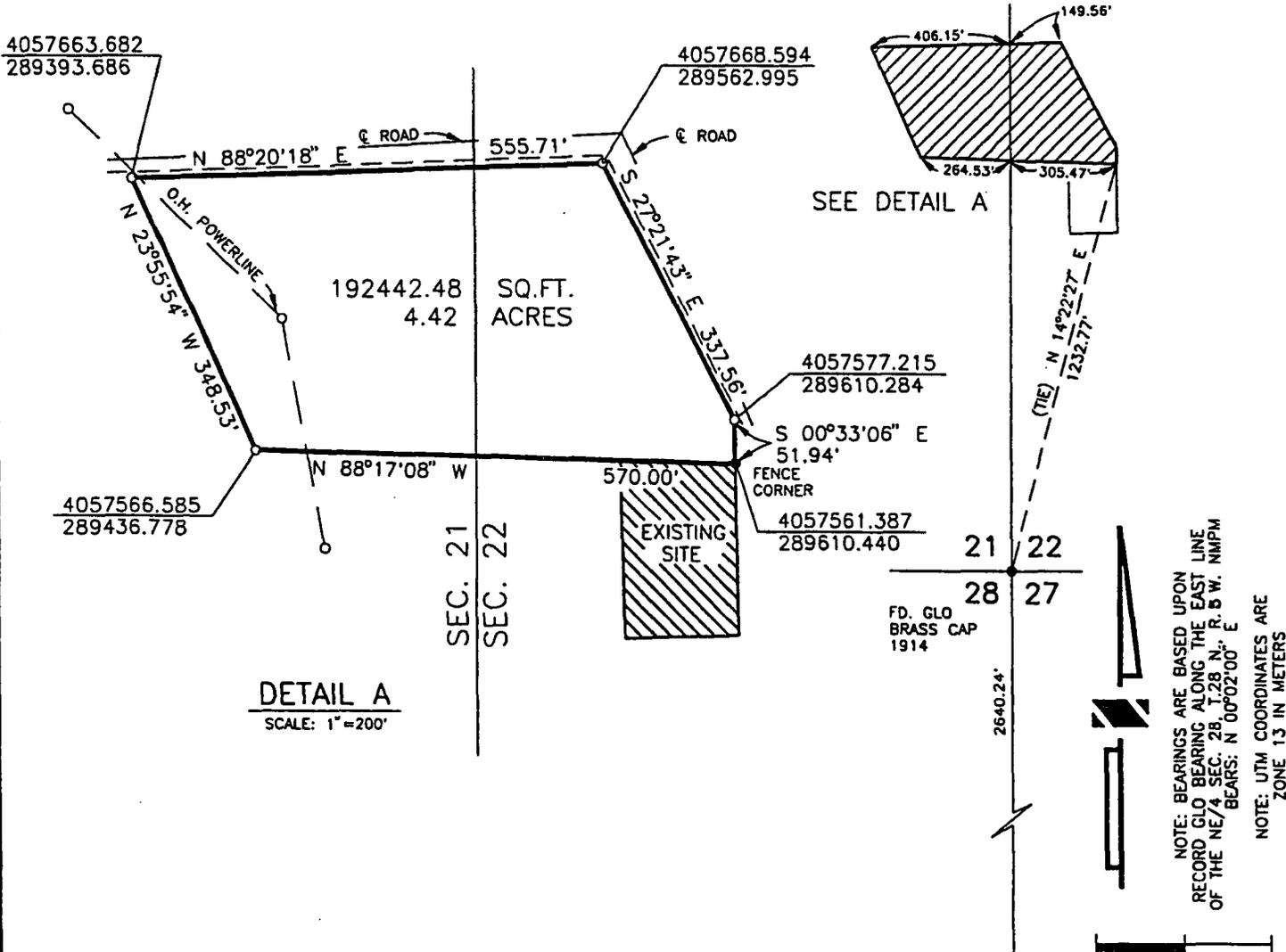
FIGURE 2
SITE PLOT PLAN

MANZANARES GATHERING SYSTEM

WILLIAMS FIELD SERVICES

LINE GOVERNADOR PRESSOR SITE EXPANSION
 FROM _____
 COUNTY RIO ARRIBA STATE NEW MEXICO
 SECTION 21 & 22 TOWNSHIP 28-N RANGE 5-W

SCALE 1" = 500'
 DRAWN BY: P.B. DATE 9/29/94
 CHECKED BY: L.M.T. SURVEYED 9/22/94
 APPROVED: _____ W.O. NO. _____
 APPROVED: _____ R/W NO. _____



DETAIL A
 SCALE: 1"=200'

CERTIFICATE OF SURVEYOR

I HEREBY CERTIFY THAT THIS PLAT IS A TRUE REPRESENTATION OF A SURVEY MADE BY ME OR UNDER MY DIRECT SUPERVISION, AND THE SAME IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Jerry L. Jeffries
 JERRY L. JEFFRIES
 NEW MEXICO L.S. # 8336

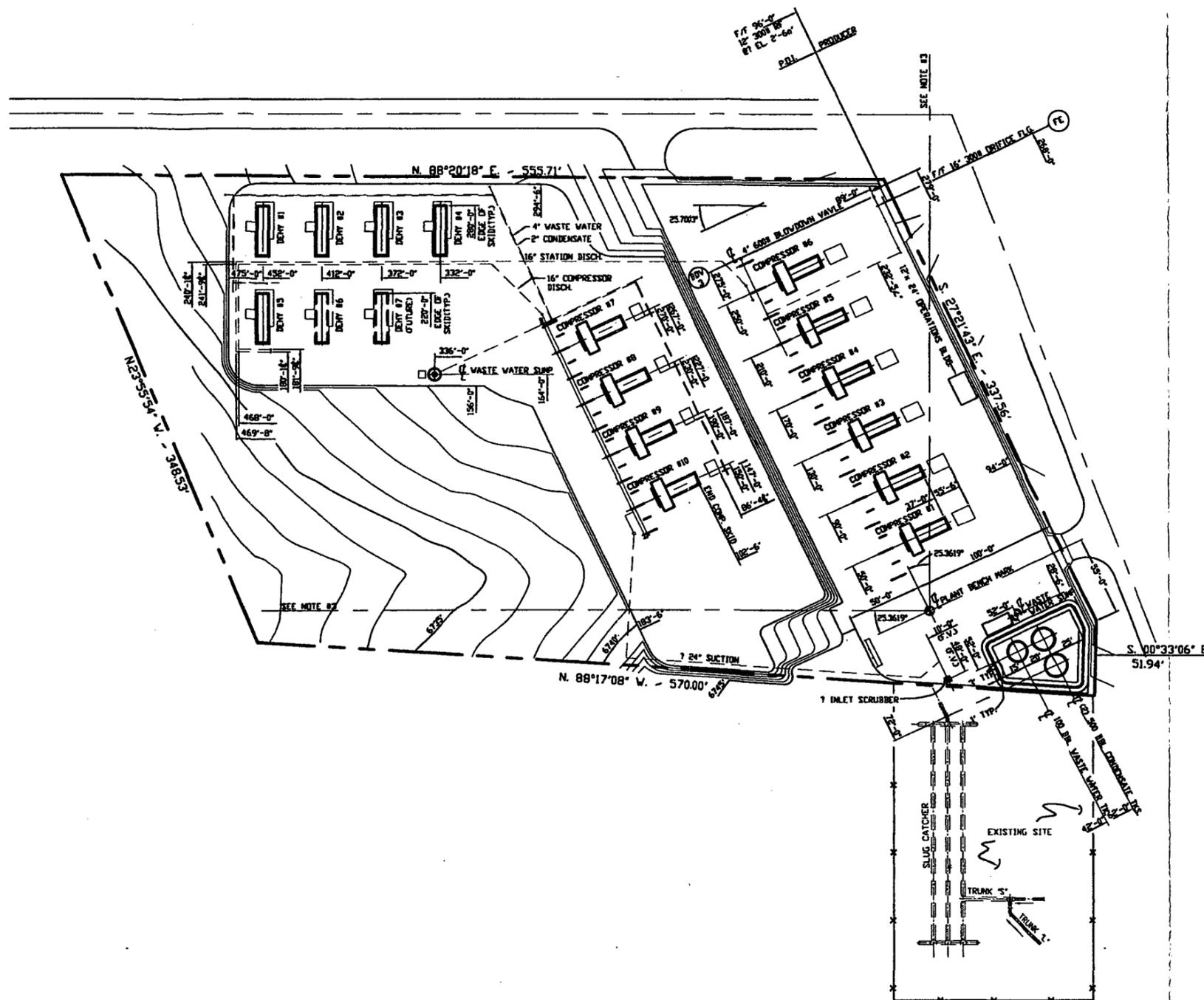
LEGEND

- SET 1/2" REBAR W/ CAP LS #6707
- FND. AS NOTED

DESIGN FACTOR							
DESIGN PRESSURE							
TEST PRESSURE							
MAOP		MINIMUM:		ACTUAL:		MAXIMUM:	
Ownership	SUBDIVISION	OWNER	LEASE	FEET	MILES	ACRES	RODS
	SE/4 SEC.21					4.42	
	SW/4 SEC.22						
Rev.							

OPERATIONS		
Manual	TRUNK "L" COMPRESSOR STATION	
Section	SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN	Document No. 42.13.001
Effective Date	08-24-99	Issue No. 03 Page No. 1 of 1

ATTACHMENT "A" PRODUCT & WASTE STORAGE LOCATIONS



REFERENCE DRAWINGS										REFERENCE DRAWINGS										REVISIONS										DRAFTING BY DATE DRAWN BY RES 08/24/99 CHECKED BY RR 08/25/99 APPROVED BY ENGINEER BY DATE DESIGNED BY PRJL APPROVED		STATE: NEW MEXICO COUNTY: RIO ARRIBA		WILLIAMS GAS PROCESSING ONE OF THE WILLIAMS COMPANIES		TRUNK "L" COMPRESSOR STATION EMERGENCY SHUTDOWN SYSTEM PLOT PLAN				SCALE: 1" = 40'-0" W.D. NO.		DWG NO. TRL-1-P11		SHEET REV 01 01	
--------------------	--	--	--	--	--	--	--	--	--	--------------------	--	--	--	--	--	--	--	--	--	-----------	--	--	--	--	--	--	--	--	--	--	--	---	--	--	--	--	--	--	--	--------------------------------	--	-------------------	--	--------------------	--

Work copy

SITE NAME	DISCHARGE PLAN #	CURRENT OCD PLAN # of Units/ HP	ACTUAL INSTALLS # of Units/ HP	AQB PERMITTED # of Units/ HP	
Category 1 - Update OCD Plans for actual compression; AQB permit allows additional installations					
OK 31-6 #1	X	GW-118	6 units/990 HP ea <i>5+4</i>	15 units/1370 HP ea	16 units/1370 HP ea
No Mod. request → OK 32-7 #1	X	GW-117	4 units/895 HP ea <i>ok</i>	6 units/1357 HP ea	8 units/1357 HP ea
No Mod. request → OK 32-8 #2	X	GW-111	4 units/895 HP ea <i>4+2</i>	5 units/1357 HP ea	9 units/1357 HP ea
OK HORSE CYN. CDP	OK	GW-61	4 units/895 HP ea <i>14</i>	6 units/1390 HP ea	14 units/1390 HP ea
OK MIDDLE MESA CDP	X	GW-64	10 units/895 HP ea <i>10+4</i>	19 units/1362 HP ea	20 units/1362 HP ea
OK PUMP MESA CDP	OK	GW-63	6 units/895 HP ea <i>6+6</i>	10 units/1363 HP ea	14 units/1363 HP ea
OK TRUNK N C.S.	OK	GW-306	5 units/1140 HP ea	6 units/1140 HP ea	8 units/1368 HP ea
No Mod. request → OK TRUNK L C.S.	X	GW-180	6 units/990 HP ea	10 units/990 HP ea	14 units/1131 HP ea
Category 2 - OCD Plan currently reflects all AQB permitted units; however, all units not yet installed					
29-6 #4CDP		GW-122	10 units; total site HP 10,980 <i>4+3</i>	6 units/1377 HP ea.; 1 unit/1148 HP	9 units/1377 HP ea.; 1 unit/1148 HP
32-9 CDP		GW-91	8 units/1379 HP ea	5 units/1379 HP ea	8 units/1379 HP ea
OK CEDAR HILL CDP		GW-87	10 units/1386 HP ea <i>ok 5+1</i>	7 units/1386 HP ea	10 units/1386 HP ea
KERNAGHAN B-8 STRADDLE		GW-272	2 units/764 HP ea	1 unit/764 HP	2 units/764 HP ea
MANZANARES CDP		GW-62	4 units/895 HP ea	3 units/895 HP ea	4 units/1300 HP ea
MOORE STRADDLE		GW-273	2 units/ 778 HP ea	1 unit/ 778 hp	2 units/ 778 hp ea
NAVAJO CDP		GW-182	4 units/2946 HP ea	3 units/2916 HP ea	4 units/2916 HP ea
TRUNK A BOOSTER C.S.		GW-248	6 units/1367 HP ea	3 units/1367 HP ea	6 units/1369 HP ea
TRUNK B BOOSTER C.S.		GW-249	7 units/1367 HP ea	3 units/1367 HP ea	7 units/1367 HP ea
MARTINEZ DRAW		GW-308	2 units/1380 HP ea	1 unit/1380 HP	2 units/1232 HP ea
QUINTANA MESA		GW-309	2 units/1380 HP & 1151 HP	1 unit/1232 HP	2 units/1232 HP & 1118 HP
Category 3 - Update OCD Plans for actual compression; all AQB permitted units installed					
29-6 #2CDP	X	GW-121	5 units/895 HP ea. <i>5+2</i>	12 units/1370 HP ea.	12 units/1370 HP ea.
ROSA #1 CDP	X	GW-292	1 unit/1372 HP	2 unit/1372 HP	2 units/1371 HP ea
TRUNK M C.S.	X	GW-181	1 unit/990 HP	2 units/1378 HP ea	2 units/1378 HP ea
PIPKIN		GW-120	2 units/856 HP total	1 unit/1403 HP	1 unit/1403 HP
LA JARA FIELD	X	GW-233	1 Solar T-3000/ 2831 hp; 2 Solar T-4000/ 2897 hp ea.	2 Solar T-4000, 2 Solar T-4700S, 1 Solar T-4700=total 17,700 hp	2 Solar T-4000, 2 Solar T-4700S, 1 Solar T-4700=total 17,700 hp

No Mod. request → OK
 No Mod. request → OK
 No Mod. request → OK

Notice of add. 9 units 7-97-1108
 Notice on renewal
 (mod. to 14 units '96)
 (14 units in renewal appl. '96)
 (6 units in appl. '95)
 (up to 8 units in renewal appl. '98)

OK

-change hp notation

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 2/23/00,
or cash received on _____ in the amount of \$ 690.00

from Williams Field Services
for Truck L.C.S. GW-180

Submitted by: [Signature] Date: 3/10/00
(Family Name) (DP No.)

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal
Modification _____ Other _____
(Specify)

Organization Code 521.07 Applicable FY 2000

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. IT ALSO HAS A REFLECTIVE WATERMARK ON THE BACK.

COMMUNITY NATIONAL BANK
OKARCHIE, OK 73762

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

857-335
1031

DATE: 02/23/2000

PAY TO THE ORDER OF:

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

SANTA FE NM 87504
United States

PAY *****\$690.00

VOID AFTER 180 DAYS

[Signature]
Authorized Signer

MA-1353 (6/97)
COPYRAN ANTI-FRAUD PROTECTION - PATENTS 4,672,386; 4,227,725; 4,316,180; 5,197,786; 6,340,159

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION	NET AMOUNT
GW180-FEB-00	20000217	0004808-SLC020007010	DISCHARGE PLAN RENEWAL GW-180, FEB 2000, C	690.00
CHECK NUMBER	PAY DATE	SUPPLIER NUMBER	SUPPLIER NAME	TOTAL AMOUNT
	02/23/2000	40665	NEW MEXICO OIL CONSERVATION DI	\$690.00



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 14, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-142-564-973

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

**RE: Discharge Plan Renewal GW-180
Williams Field Services, Inc.
Trunk L Compressor Station
Rio Arriba County, New Mexico**

Dear Ms. Deklau:

The ground water discharge plan renewal application GW-180 for the Williams Field Services, Inc. Trunk L Compressor Station located in the NW/4 SW/4 of Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The original discharge plan application was submitted on November 8, 1994 and approved February 21, 1995. The discharge plan renewal application letter, dated November 11, 1999, submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services, Inc. of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Ms. Ingrid Deklau
GW-180 Trunk L Compressor Station
February 11, 2000
Page 2

Pursuant to Section 3109.G.4., this renewal plan is for a period of five years. This renewal will expire on **February 21, 2005**, and Williams Field Services, Inc. should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

Williams Field Services, Inc. will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the Trunk L Compressor Station facility.

The discharge plan renewal application for the Williams Field Services, Inc. Trunk L Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of \$50. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 3000 horsepower equal to one-half of the original flat fee or \$690.00. The OCD has received the filing fee.

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

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

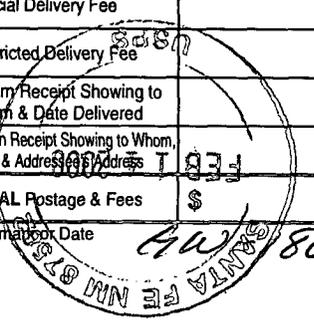
xc: OCD Aztec Office

Z 142 564 973 OCD

US Postal Service **FORD**
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	I. Deklau
Street & Number	WFS
Post Office, State, & ZIP Code	SIC
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	\$3.87
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address	FBI
TOTAL Postage & Fees	\$
Postmark Date	FW 11 80

PS Form 3800, April 1995



ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-180
WILLIAMS FIELD SERVICES, INC.
TRUNK L COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(February 14, 2000)

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor stations with horsepower rating greater than 3000 horsepower. The renewal flat fee required for this facility is \$690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.
2. Williams Field Services, Inc. Commitments: Williams Field Services, Inc. will abide by all commitments submitted in the discharge plan renewal application letter dated November 11, 1999 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected 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: The facility will have an approved storm water run-off plan.

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

by _____
Title



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

November 11, 1999

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: OCD Discharge Plan Renewal: Trunk L Compressor Station (GW-180)

Dear Mr. Anderson:

Enclosed, please find Check Number 2215621 for \$100 to cover the application fee for the Discharge Plan Renewal of Williams Field Services (WFS) Trunk L (GW-180) and Trunk M (GW-181). The information attached serves to update the original Trunk L discharge plan that was submitted to the OCD in October 1994, and only addresses information that is new or modified since the original plan. For your information, documents in the WFS files that are believed to constitute the Trunk L Compressor Station Discharge Plan are listed below.

May 25, 1999	OCD approval of update
May 11, 1999	WFS Discharge Plan Update (increase compression)
April 25, 1995	OCD approval of update
March 17, 1995	WFS Discharge Plan Update (install wastewater sump)
February 21, 1995	OCD approval of application
November 8, 1994	WFS Application

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

Sincerely,

Ingrid A. Deklau
Senior Environmental Specialist

enclosures

xc: Denny Foust, Aztec OCD Office

Information in the following sections updates information included in the November 1994 application and subsequent updates submitted to the OCD by WFS. The text below is formatted to correspond to the format of the November 1994 application. A plot plan of the facility is included as an attachment following this letter for your convenience.

1.0 GENERAL INFORMATION

1.1 Contact Person

Ingrid Deklau
Environmental Specialist
801-584-6543

Landowner

Bureau of Land Management
1235 Laplata Highway
Farmington, NM 87401
(505-599-8900)

1.3 Type of Natural Gas Operation

There are currently 10 compressor units (990 hp, site-rated) and 6 dehys operating at the site. However, the current New Mexico Air Quality Permit for this site allows the installation of 14 compressor units and 7 dehys.

2.0 GENERAL PROCESSES

2.1 Process Fluids

Table 1 below has been redesigned and updated to illustrate typical transfer, storage, and disposal of process fluids, effluents, and waste solids currently occurring at the facility.

2.2 Spill/Leak Prevention and Housekeeping Procedures

An updated copy of the WFS Corporate policy and procedures for controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided following the site diagram included in this letter. WFS Environmental Affairs will report significant spills and leaks to the OCD pursuant to OCD Rule 116 and WQCC 1-203.

2.3 Disposal of Waste Fluids

New waste streams associated with the installation of the glycol dehydrators have been generated at the facility since the plan was originally submitted in 1994 (see Table 1 below).

Section 2.3, as it appears in the August 1993 application is accurate, with the following exception. Used motor oil is collected in a closed piping system that drains to a 500-gal used oil tank adjacent to each compressor.

**TABLE 1
TYPICAL TRANSFER, STORAGE, AND DISPOSAL OF EFFLUENTS, AND WASTE SOLIDS
TRUNK L COMPRESSOR STATION**

PROCESS FLUID/WASTE	SOURCE	STORAGE (typical)	CONTAINER CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Compressors, engines	AST*	1 @ 500 gal at each compressor	Berm	Non-exempt	Transported to EPA-registered used oil marketer for recycling.
Produced Water/ Condensate	Filter Separator, Pipe Rack, Scrubbers, Inlet Filters, Dehys Pulsation Bottle	AST*	2 @ 500 bbl	Berm	Exempt	Hauled to approved facility
Wash down/ waste water	Rain/ wash down water off compressor skids	Sump to AST	15 bbl / 100 bbl	fiberglass sump, flows into 100 bbl tank	Non-exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered.
Wash down/ waste water	Rain/ wash down water off dehy and compressor skids	Sump to AST	15 bbl/ 90 bbl	Fiberglass sump flows into 90 bbl vaulted tank	Non-exempt	Water may be transported to NMOCD-approved facility; or evaporation at WFS facility may be considered.
Used Glycol	Dehydration	N/A	N/A	Not currently stored on site	Exempt	Transported to vendor for recycling, or disposed at approved facility
Used process filters (eg, glycol, inlet)	Dehydrators, hydrocarbon removal	Varies	Varies	N/A	Exempt	Drained and transported to approved disposal facility.
Used Oil Filters	Compressors, engines	Varies	Varies	N/A	Non-exempt	Drained and transported to approved disposal facility.
Spill Residue (i.e., soil, gravel) or other exempt waste	Incidental spills, leaks, or cleanup	Incident dependent	N/A	In-situ treatment, landfarm, or alternate method	Incident dependent	Landfarmed on-site or disposed at OCD-approved facility (free liquid will be removed from residue, i.e., pumping, solidification, evaporation). On-site treatment will be conducted per applicable NMOCD Guidelines.
Used Absorbents	Incidental spills, leaks, or cleanup	Special waste bin	Varies	N/A	Incident dependent	Drained and transported to approved disposal facility.
Lube Oil	For use in compressors, engines, etc.	AST*	1 @ 500 gal adjacent to each compressor	Berm	N/A	N/A
Glycol	For use in dehys	AST*	1 @ 125 gal, ea dehy	Dehy skid	N/A	N/A
Antifreeze	Used in equipment to prevent freezing	AST*	2 @ 500 gal	Berm	N/A	N/A

*AST= Above Ground Storage Tank

	Reference (Book Title) Operations/Maintenance Field Services	Task/Document No. 21.10.020
	Section General/Safety	Regulation No.
	Subject Discharges or Spills of Oil or Hazardous Substances: Preventing, Controlling and Reporting of	Effective Date 09/22/99

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▶ **Document History (ISO9001)**

▼ **Document Body**

A. PURPOSE AND SCOPE

A.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).

A.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.

B. CONTENTS

C. POLICY

- C.1 General
- C.2 Bulk Storage Tanks
- C.3 Facility Drainage
- C.4 Transfer Operations, Pumping and In-Plant/Station Process
- C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack

D. PROCEDURE

- D.1 Identifying, Containing and Initial Reporting of a discharge or Spill of a Hazardous or Toxic Substance
- D.2 Submitting Written Notification of a Discharge or Spill

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

C. POLICY

C.1 GENERAL

C.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.

C.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.

C.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

C.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).

C.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.

C.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.

C.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.

C.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.

C.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.

C.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.

C.2 BULK STORAGE TANKS

C.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.

C.2.2 The facility superintendent should evaluate tank level monitoring requirements to prevent tank overflow.

C.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.

C.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.

C.3 FACILITY DRAINAGE

C.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.

C.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.

C.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.

C.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.

C.3.5 Other means of containment or spill control include, but are not limited to:

- a. Berms or retaining walls;
- b. Curbing;
- c. Culverting, gutters, or other drainage systems;
- d. Weirs, booms, or other barriers;
- e. Spill diversion ponds or retention ponds;
- f. Sorbent materials

C.4 TRANSFER OPERATIONS, PUMPING and IN-PLANT/STATION PROCESS

C.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.

C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

C.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.

C.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.

C.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.

D. PROCEDURE

D.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of Oil or Hazardous Substance

Any Employee

D.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; or
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

D.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

D.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.

D.1.4 If Environmental Affairs cannot be contacted, notifies Director over Environmental Affairs.

Facility Superintendent

D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director informed.

D.1.6 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).

D.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

D.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).

D.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.

D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee

cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Superintendent or Designee

D.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.

D.2.2 Forwards the completed written description to Environmental Affairs. Retains a copy for future reference.

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

ATTACHMENT A

DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS

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

3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.

Note: Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.

C. Bulk Storage Tanks or any other Facilities

1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning.
2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.

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The Santa Fe New Mexican

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CONSERVATION DIVISION

NM OIL CONSERVATION DIVISION
ATTN: DONNA DOMINGUEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

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LEGAL NO: 66710 P.O.#: 00199000278
228 LINES 1 time(s) at \$ 100.51
AFFIDAVITS: 5.25
TAX: 6.61
TOTAL: 112.37

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-180) - Williams Field Service, Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84108-0900, has submitted a discharge plan renewal application for the Trunk L compressor station located in the NW/4 SW/4, Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in above ground, closed-top steel tanks prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-181) - Williams Field Services, Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan renewal application for their Trunk M compressor station located in the SE/4 NE/4, Section 29, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 1 barrel per day of produced water with a total dissolved solids concentration in excess of

2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing should be held.

A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on the information available. If a public hearing is held, the Director will approve the proposed plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 5th day of January, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
LORI WROTENBERY,
Director

Legal #66710
Pub. January 12, 2000

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, B. Perner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #66710 a copy of which is hereto attached was published in said newspaper 1 day(s) between 01/12/2000 and 01/12/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 12 day of January, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
10 day of January A.D., 2000

Notary

Commission Expires

3-13-2001



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STATE OF NEW MEXICO

My Commission Expires

P.O. Box 2048 • Santa Fe, New Mexico 87501

505-983-3303

Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan application, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of

disapprove the plan based on information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of January 2000.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
Roger Chandler for
LORI WROTENBERRY,
Director

(SEAL)
(Published January 13, 2000.)

Affidavit of Publication

State of New Mexico
County of Río Arriba

I, Robert Trapp, being first duly sworn, declare and say I am the Publisher of the **Río Grande SUN**, a weekly newspaper published in the English language and having a general circulation in the County of Santa Fe, State of New Mexico, and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 of the Session Laws of 1937; the publication, a copy of which is hereto attached, was published in said paper once each week for

1 consecutive weeks and on the same day of each week in the regular issue of the paper during the time of publication and the notice was published in the newspaper proper, and not in any

supplement, the first publication being on the 13th day of

January, 2000 and the last publi-

cation on the 13th day of January,

2000; payment for said advertisement has been duly made, or assessed as court costs; the undersigned has personal knowledge of the matters and things set forth in this affidavit.

Robert Trapp
Publisher

Subscribed and sworn to before me this 13th day of

January A.D., 2000.

Ruth J. Trapp
Notary Public

My commission expires 17 May 2001

Publisher's Bill

at 57.64

nes at _____

ffidavit 5.00

bttotal 62.64

Tax 3.88

Total \$ 66.52

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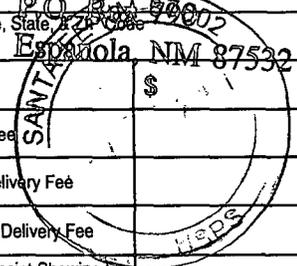
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GW 180 & 181

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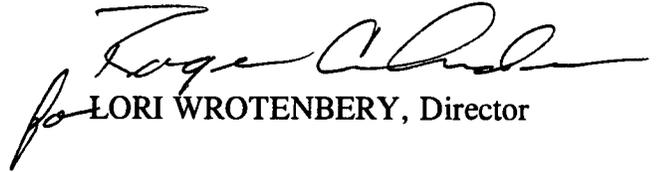
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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 5th day of January, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL


LORI WROTENBERY, Director

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 11-12-99
or cash received on _____ in the amount of \$ 50.00
from Williams Field Services
for Trunk L Compressor Station GW-180
Submitted by: [Signature] Date: 12-10-99
Submitted to ASD by: _____ Date: _____
Received in ASD by: _____ Date: _____
Filing Fee New Facility _____ Renewal _____
Modification _____ Other _____
Organization Code 521.07 Applicable FY 2000

To be deposited in the Water Quality Management Fund.
Full Payment or Annual Increment _____

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. IT ALSO HAS A REFLECTIVE WATERMARK ON THE BACK.

COMMUNITY NATIONAL BANK
OKARCHE, OK 73762

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

PAY TO THE ORDER OF: _____

DATE: 11/12/1999

PAY *****\$100.00

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

SANTA FE
United States

NM 87504

VOID AFTER 180 DAYS

[Signature]
Authorized Signer

MA 1353 (6/97)



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

August 23, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-524

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

RE: Discharge Plan GW-180 Renewal
Trunk L Compressor Station
Rio Arriba County, New Mexico

Dear Ms. Deklau:

On February 21, 1995, the groundwater discharge plan renewal, GW-180, for the Williams Field Services Trunk L Compressor Station located in the NW/4 SW/4 of Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. **The approval will expire on February 21, 2000.**

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed. **Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether Williams Field Services has made or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the **Trunk L Compressor Station** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50.00 plus a flat fee equal to one-half of the original flat fee for compressor stations with horsepower greater than 3000 horsepower. The \$50.00 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

Z 274 520 524 OCD

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to		I. Deklau
Street & Number		WFS
Post Office, State, & ZIP Code		SLC
Postage		\$
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees		
Postmark or Date		SALT LAKE CITY UT 84108

PS Form 3800, April 1995

Ms. Ingrid A. Deklau
August 23, 1999
Page 2

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

If the Trunk L Compressor Station no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Williams Field Services Company has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 827-7156.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf

enclosed: Discharge Plan Application form

cc: OCD Aztec District Office



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505

May 25, 1999

**CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-095**

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

**RE: Site Modifications Notification
GW-180, Trunk L Compressor Station
Rio Arriba County, New Mexico**

Dear Ms. Deklau:

The OCD has received the site modification letter, dated May 11, 1999, from Williams Field Services for the Trunk L Compressor Station GW-180 located in NW/4 SW/4, Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. The requested modification is considered a minor modification to the above referenced discharge plan and public notice will not be issued. **The site modifications are approved without modification to the discharge plan with the stipulation that all modifications comply with the discharge plan approved February 21, 1995.**

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

Sincerely,

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

cc: Mr. Denny Foust - Aztec District Office

Z 357 870 095

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to <i>Ingrid</i>	
Street & Number <i>WFS</i>	
Post Office, State, & ZIP Code <i>SLC</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>GW-180</i>	

PS Form 3800, April 1995



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

May 11, 1999

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

Re: Modification of Williams Field Services Discharge Plan for Trunk L (GW - 180)

Dear Mr. Ford:

Pursuant to our conversation today and my March 1999 submittal to you, Williams Field Services (WFS) formally requests modification to the Discharge Plan for the Trunk L compressor site to allow the installation of up to fourteen 1131 horsepower units. There are currently ten units operating at the site. This modification includes the installation of additional compression and an increase in horsepower. No additional waste streams will be generated with this modification. This modification corresponds to permitting levels allowed by the Air Permit currently held for this site.

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

Sincerely,

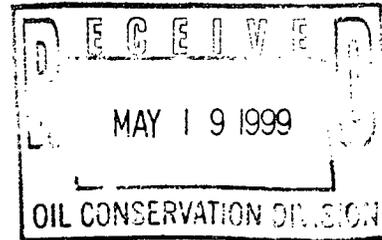
A handwritten signature in black ink, appearing to read "Ingrid Deklau".

Ingrid Deklau
Environmental Specialist

XC: Denny Foust, Aztec OCD



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



May 14, 1999

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

Re: WFS Requests for Modification of Various OCD Discharge Plans

Dear Mr. Ford:

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

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

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

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

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

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

Roger Anderson
Pat Sanchez

+

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980
DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719
DISTRICT III
1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

SUBMIT 2 COPIES TO
APPROPRIATE DISTRICT
OFFICE IN ACCORDANCE
WITH RULE 116 PRINTED
ON BACK SIDE OF FORM

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

OPERATOR Willaims Field Services					ADDRESS 295 Chipeta Way Salt Lake City, UT (801)			TELEPHONE # 584-6543	
REPORT OF	FIRE X	BREAK	SPILL	LEAK	BLOWOUT	OTHER*			
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT	OIL RFY	OTHER* Compressor Station		
FACILITY NAME: Trunk L Compressor Station									
LOCATION OF FACILITY Qtr/Qtr Sec. or Footage SW/4 NW/4 of the SW/4					SEC. 22	TWP. 28N	RGE. 5W	COUNTY Rio Arriba	
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK 26 miles east-southeast of Blanco, New Mexico									
DATE AND HOUR OF OCCURRENCE 11/6/96 8:07 PM					DATE AND HOUR OF DISCOVERY Same				
WAS IMMEDIATE NOTICE GIVEN?		YES X	NO	NOT REQUIRED	IF YES, TO WHOM 911				
BY WHOM Ed Lucero					DATE AND HOUR 8:07 PM 11/6/96				
TYPE OF FLUID LOST Condensate					QUANTITY OF LOSS 100 gallons		VOLUME RECOVERED 0		
DID ANY FLUIDS REACH A WATERCOURSE?		YES	NO X	QUANTITY					

IF YES, DESCRIBE FULLY**
N/A

RECEIVED

NOV 15 1996

Environmental Bureau
Oil Conservation Division

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**
The fire was apparently caused by an ignition source at the exhaust stack of compressor unit #1. The spark flashed over to the condensate tank. The condensate tank had overflowed approximately 100 gallons of condensate inside the tank berm earlier. The line had just been pigged.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**
The Blanco and Navajo Dam volunteer fire departments responded to the fire. The fire was extinguished shortly after the departments arrived on site. WFS is evaluating the option of moving the tanks outside the station yard to prevent future occurrences.

DESCRIPTION OF AREA	FARMING	GRAZING X	URBAN	OTHER*			
SURFACE CONDITIONS	SANDY	SANDY LOAM X	CLAY	ROCKY	WET	DRY X	SNOW

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**
Calm, cool, 25° F. dry.
SF 11/12/96

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED *Leigh E. Gooding* PRINTED NAME AND TITLE Leigh E. Gooding Sr. Environmental Specialist DATE 11/12/96

WILLIAMS FIELD SERVICES

ONE OF THE WILLIAMS COMPANIES



OIL CONSERVATION DIVISION
RECEIVED

P.O. Box 58900
Salt Lake City, UT 84158-0900
(801) 584-7033
FAX: (801) 584-6483

'95 MAR 5 AM 8 52

April 28, 1995

Mr. Rodger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Re: Site Plan for Trunk L Compressor Station - Rio Arriba County

Dear Mr. Anderson:

Enclosed please find two copies of the site plan for Williams Field Services' Trunk L Compressor Station located in Rio Arriba County, New Mexico. A Discharge Plan was submitted for this site (GW-180), but the engineering drawings were not available at the time of submittal. Construction of this site is scheduled to be completed sometime in mid-June.

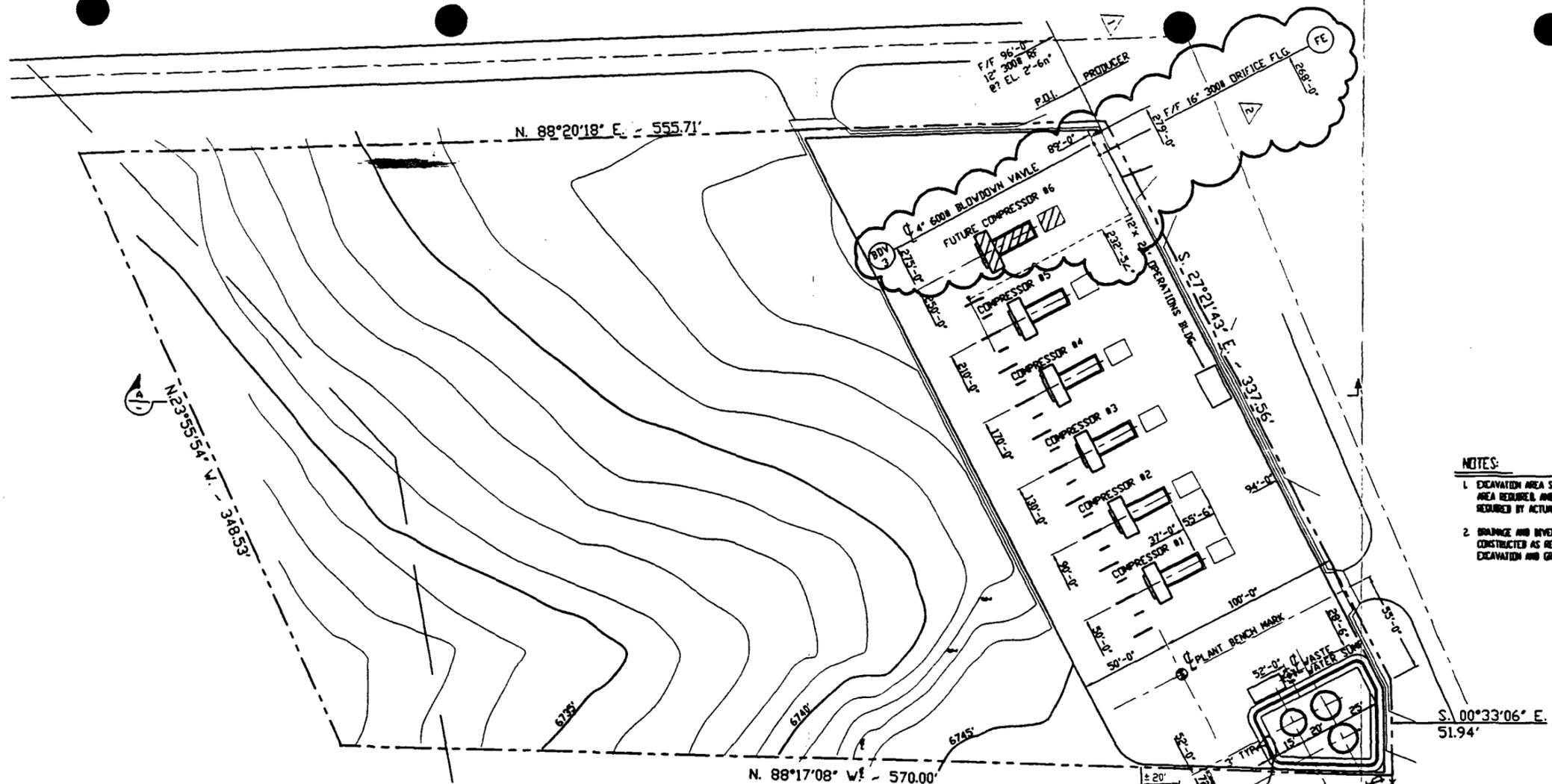
If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Leigh E. Gooding, P.G.
Environmental Specialist

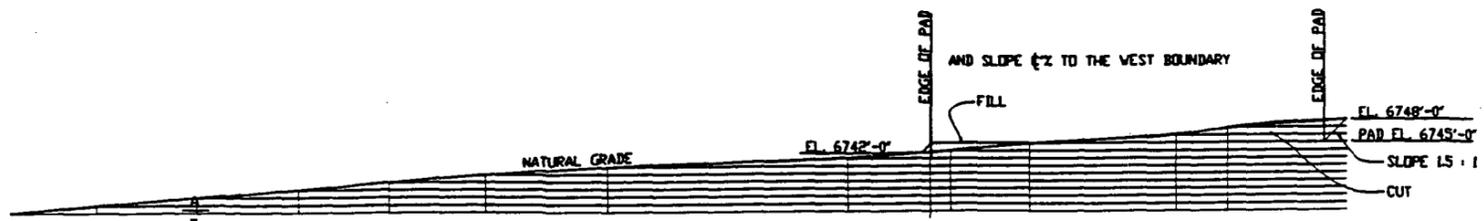
Enclosures

cc: Denny Foust, Aztec Office



- NOTES:**
1. EXCAVATION AREA SHOWN IS AN APPROXIMATE AREA REQUIRED AND MAY BE ADJUSTED AS REQUIRED BY ACTUAL FIELD CONDITIONS.
 2. BRANCH AND DIVERSON BARS ARE TO BE CONSTRUCTED AS REQUIRED AFTER FINAL EXCAVATION AND GRADING IS COMPLETE.

CROWN PAD @ EAST-WEST CENTERLINE
SLOPE 1/2 TO THE EAST BOUNDARY



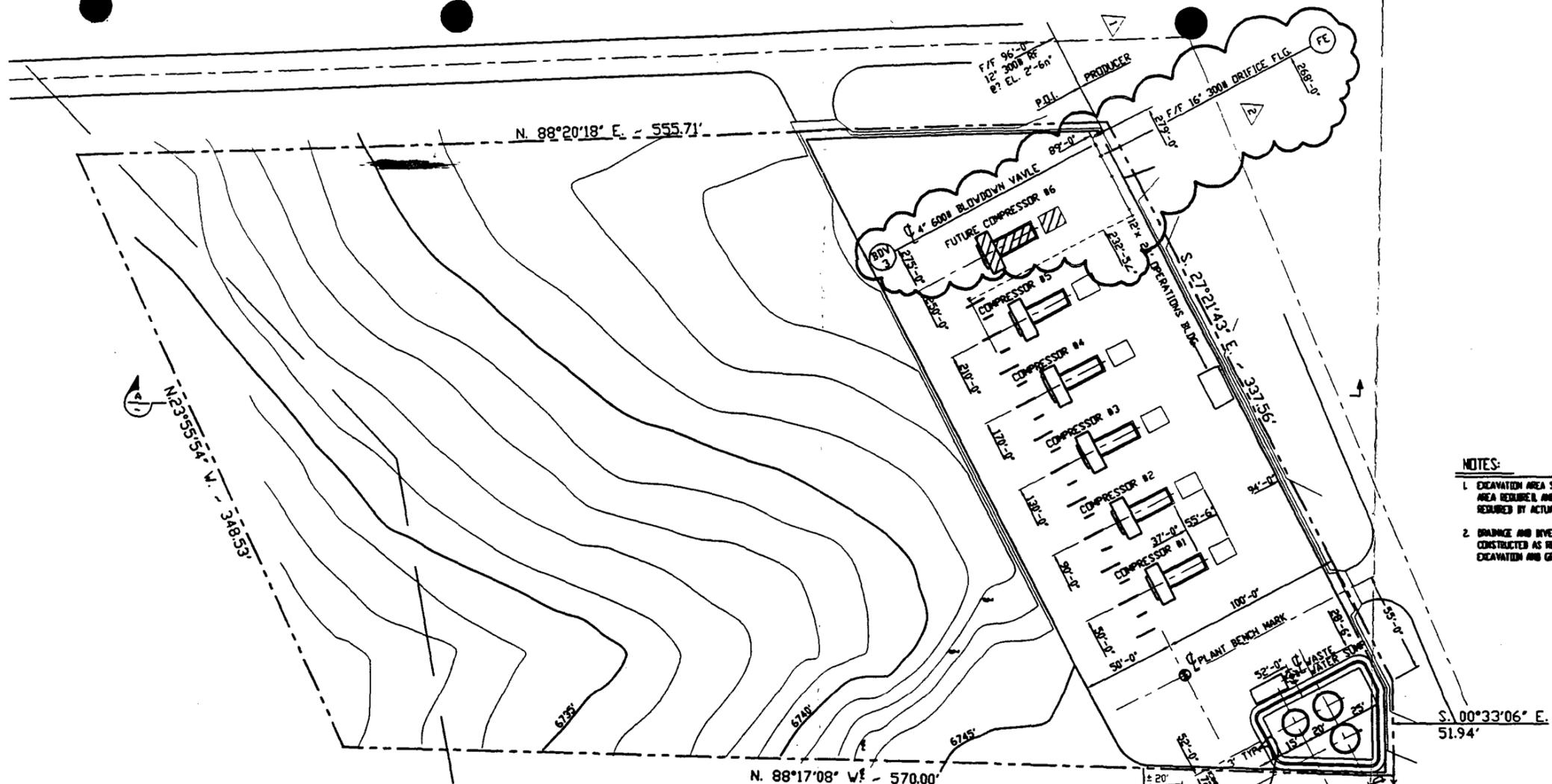
PROFILE 'A-A'
VERTICAL SCALE EXPANDED 3 : 1



AREA = 192442.48 Sq.Ft.
OR 4.42 ACRES

				DRAFTING		BY	DATE	WILLIAMS FIELD SERVICES <small>ONE OF THE WILLIAMS COMPANIES</small> SAN JUAN TRUNK "C" COMPRESSOR STATION EXCAVATION AND SITE LAYOUT	
				DRAIN		TY	11/30/94		
				CHECKED		JK	3/7/95		
				APPROVED				ENGINEERING BY DATE	
				ISSUED FOR APPROVAL					
				C & S REVIEW				SCALE: 1"=30' W.O. # 11087	
				PROJECT APPROVED					
				PLOT DATE/TIME		4/24/1995 9:44 AM		DWG. NO. TRJ-1-M1	
REVISIONS									

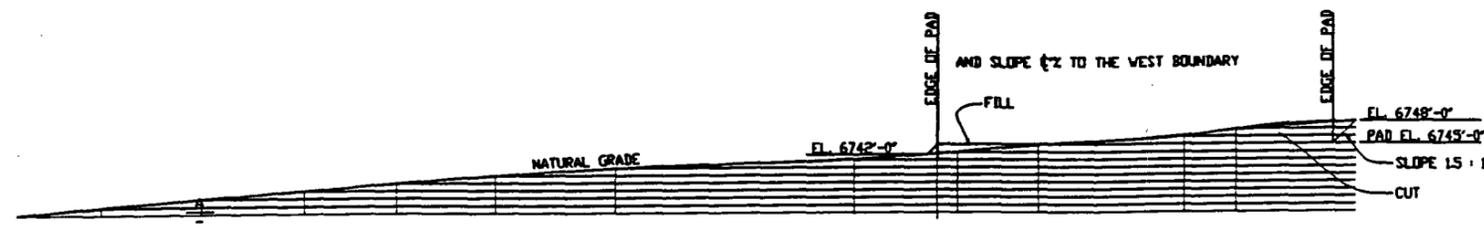




- NOTES:**
1. EXCAVATION AREA SHOWN IS AN APPROXIMATE AREA REQUIRED, AND MAY BE ADJUSTED AS REQUIRED BY ACTUAL FIELD CONDITIONS.
 2. BRADICE AND INVERSION DMS ARE TO BE CONSTRUCTED AS REQUIRED AFTER FINAL EXCAVATION AND GRADING IS COMPLETE.

CROWN PAD @ EAST-WEST CENTERLINE
SLOPE 1/2% TO THE EAST BOUNDARY

EXISTING SITE



PROFILE 'A-A'
VERTICAL SCALE EXPANDED 3:1



AREA = 192442.48 Sq.Ft.
OR 4.42 ACRES



WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES
**SAN JUAN TRUNK "I" COMPRESSOR STATION
EXCAVATION AND SITE LAYOUT**

NO.	DATE	BY	DESCRIPTION	W.O. #	APP.	DRAFTING	BY	DATE
2	4/21/95	TT	LOCATED RESURFACE METER	1987		DESIGN	TT	11/28/94
1	4/18/95	TT	CHANGED DC AREA & STA. DESIG.	1987		CHECKED	J.K.	3/7/95
0	3/16/95	TT	ISSUED FOR APPROVAL			APPROVED		
						ENGINEERING		
						C & S REVIEW		
						PROJECT APPROVED		
						PLOT DATE/TIME	4/24/1995 9:4 AM	

SCALE: 1"=30'
W.O. # 11087
DWG. NO. TRL-1-M1



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES

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

April 25, 1995

P 176 012 130



Receipt for
Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-130

Ms. Leigh Gooding
Williams Field Services, Inc.
P.O. Box 58900
Salt Lake City, Utah 84158-0900

RE: Discharge Plan GW-180
Trunk "L" Compressor Station
Rio Arriba County, New Mexico

Dear Ms. Gooding:

The Oil Conservation Division (OCD) has received Williams Field Services' (Williams) request dated March 17, 1995 to install a below grade sump at the above referenced facility. The request includes the plan and specifications for installation of the sump.

Based on the information provided, the OCD hereby approves the installation of the sump under the following conditions:

1. **Leak Detection Schedule:** The leak detection system will be checked at a minimum of monthly. The date of inspection, results, and inspectors initials will be recorded and kept at the facility and available for OCD inspection.
2. **Leak Notification:** Any leaks or overflows will be reported to the OCD within 24 hours of discovery.

Please be advised that OCD approval of this operation does not relieve Williams of liability should its operation result in pollution of surface water, ground water or the environment. Nor does OCD approval relieve Williams of responsibility for compliance with other federal, state or local laws and/or regulations.

If you have any questions do not hesitate to contact me at (505) 827-7153.

Sincerely,

Chris Eustice
Environmental Geologist

xc: Denny Foust, OCD Aztec Office

PS Form 3800, June 1991

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	



P.O. Box 58900
Salt Lake City, UT 84158-0900
(801) 584-7033
FAX: (801) 584-6483

March 17, 1995

Mr. Rodger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Re: Discharge Plan Update for Trunk L Compressor Station in Rio
Arriba County, New Mexico.

Dear Mr. Anderson:

Attached, please find an update to the Discharge Plan for Williams Field Services' Trunk L Compressor Station. The original plan was approved on February 21, 1995 (GW-180). This update addresses the proposed addition of a below-grade wastewater sump.

If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

A handwritten signature in cursive script that reads "Leigh E. Gooding".

Leigh E. Gooding, P.G.
Environmental Specialist

Attachment

WILLIAMS FIELD SERVICES
TRUNK L COMPRESSOR STATION DISCHARGE PLAN UPDATE
March 1995

I. BACKGROUND INFORMATION

On November 8, 1994, Williams Field Services (WFS) submitted a Discharge Plan for Trunk L Compressor Station to the New Mexico Oil Conservation Division (OCD) for review and approval. Trunk L Compressor Station is located in the NW/4 SW/4 of Section 22, Township 28 North, Range 5 West, Rio Arriba County, New Mexico. The plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. The plan, GW-180, was subsequently approved by OCD on February 21, 1995.

According to the terms of the Discharge Plan, WFS is required to notify the Director of the OCD of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume. This update addresses proposed modifications at Trunk L Compressor Station.

II PROPOSED MODIFICATIONS

Williams Field Services proposes to install a below-grade waste water sump at the subject site. The sump will be constructed in accordance with OCD Guidelines for the Selection and Installation of Below-Grade Produced Water Tanks (revised 10/91). Waste water will gravity-drain from concrete containment skids below compressor units and lube oil day tanks to the sump. The sump will consist of a six foot diameter, 740-gallon fiberglass tank set within an eight foot diameter fiberglass tank. A submersible pump equipped with a float control will be placed in the inner tank through a thirty-inch well. Any waste water accumulations will be pumped from the inner tank to an above-ground holding tank. An eight-inch inspection port will be installed within the outer tank for visual inspection. A schematic drawing of the sump is attached.

No new liquid wastes are expected to be generated by the proposed modifications.

III SUMMARY

No new or additional liquid wastes will be generated by the proposed modifications at this facility. All liquid wastes will be handled in accordance with the approved OCD Discharge Plan (GW-180) and this revision.

IV AFFIRMATION

I hereby certify that I am familiar with the information contained in and submitted with this revision and that such information is true, accurate, and complete to the best of my knowledge and belief.



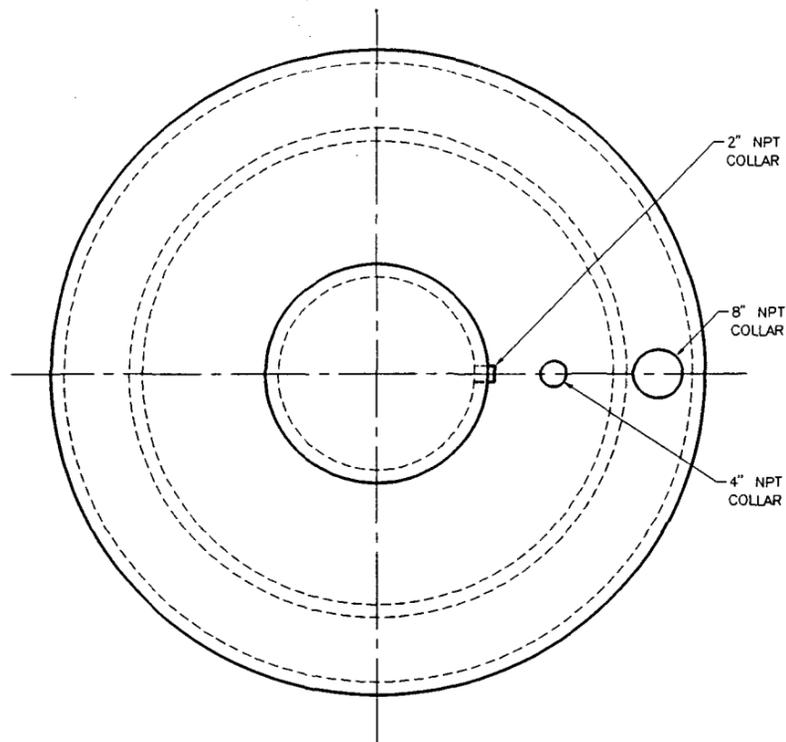
Signature

Rob M. Hawksworth

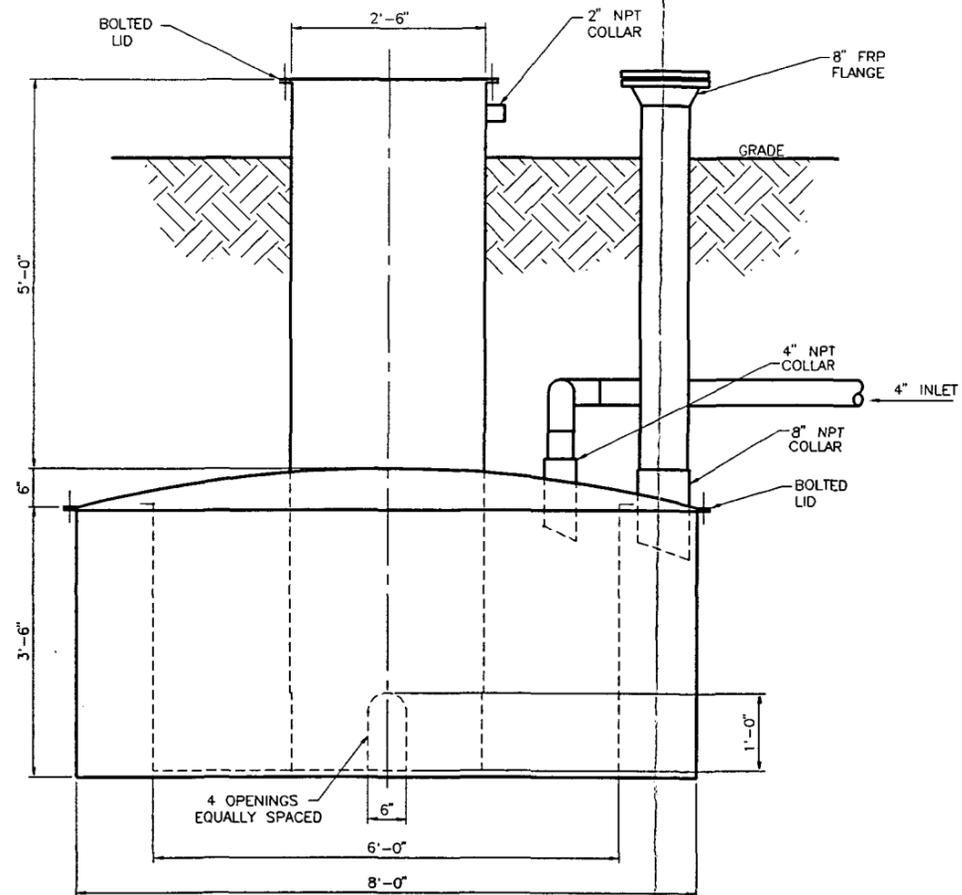
3/12/95

Date

Director, Shared Services



WASTE WATER SUMP
PLAN VIEW



WASTE WATER SUMP
ELEVATION

PRELIMINARY

										DRAFTING BY DATE DRAWN RJB 03/03/95 CHECKED APPROVED ENGINEERING BY DATE PROJ. APPROVED			WILLIAMS GAS PROCESSING <small>ONE OF THE WILLIAMS COMPANIES</small> GATHERING SYSTEM STANDARD FIBERGLASS WATER SUMP			REV.	
										SCALE: 1"=1'	DWG. NO. STD-D-1-4042						
LEGEND		REFERENCE DRAWINGS				REVISIONS											
DRAWING NO.	TITLE	DRAWING NO.	TITLE	NO.	DATE	BY	DESCRIPTION	V.D./NO.	CHK.	APP.	NO.	DATE	BY	DESCRIPTION	V.D./NO.	CHK.	APP.

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT

OIL CONSERVATION DIVISION
Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-180) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 88900, M.S. 10368, Salt Lake City, Utah 84188-0900, has submitted a discharge plan application for their Trunk L compressor station located in the NW/4 SW/4, Section 22, Township 28 North, Range 8 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-181) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 88900, M.S. 10368, Salt Lake City, Utah 84188-0900, has submitted a discharge plan application for their Trunk M compressor station located in the SE/4 NE/4, Section 28, Township 30 North, Range 8 West, NMPM, Rio Arriba County, New Mexico. Approximately 12 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-182) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 88900, M.S. 10368, Salt Lake City, Utah 84188-0900, has submitted a discharge plan application for their Navajo CDP compressor station located in the SE/4 NW/4, Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 1 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the

STATE OF NEW MEXICO
County of Bernalillo SS

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for one times, the first publication being of the 19th day of Jan., 1995, and the subsequent consecutive publications on none 1995.

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 19th day of Jan. 1995,

NOTARY PUBLIC

Megan Millage

NOTARY PUBLIC

STATE OF NEW MEXICO

5/20/98

PRICE \$55.23

Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER C80932

OK TO PAY. *CS*

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-180) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Trunk L compressor station located in the NW/4 SW/4, Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-181) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Trunk M compressor station located in the SE/4 NE/4, Section 29, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 1 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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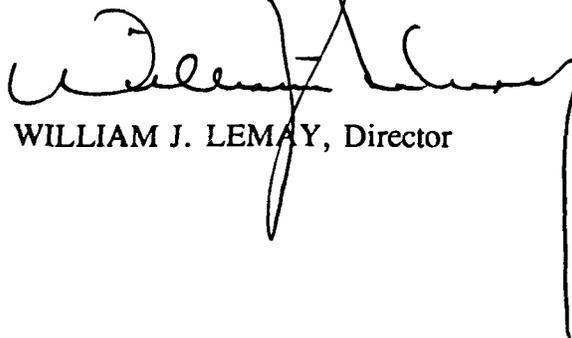
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A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 9th day of January, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

SEAL

NO EFFECT FINDING

The described action will have no effect on listed species, wetlands, or other important wildlife resources.

Date January 27, 1995

Consultation # 2-22-95-I-142

Approved by R. Mark Wilson

U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO

AFFIDAVIT OF PUBLICATION

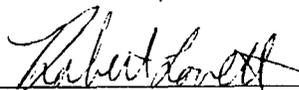
No.34246

STATE OF NEW MEXICO
County of San Juan:

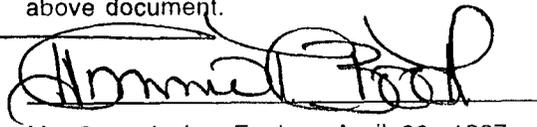
ROBERT LOVETT being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES,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

Thursday, January 19, 1995

and the cost of publication was: \$75.51



On 1/20 **ROBERT LOVETT** appeared before me, whom I know personally to be the person who signed the above document.



My Commission Expires April 22, 1997.

COPY OF PUBLICATION

Legals

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 9th day of January, 1995.

SEAL

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

Legal No. 34246 published in The Daily Times, Farmington, New Mexico on Thursday, January 19, 1995.

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

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STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

(SEAL)
(Published January 19, 1995)

NEW MEXICO }
D Arriba }

Trapp, being first duly sworn, declare and say that I am the Publisher of Rio Grande Sun, a weekly newspaper, published in the English language having a general circulation in the City of Espanola and County of Sandoval, State of New Mexico, and being a newspaper duly qualified to publish notices and advertisements under the provisions of Chapter 167 of the Statutes of 1937; that the publication, a copy of which is hereto attached,

is published in said paper once each week for consecutive weeks, on the day of each week in the regular issue of the paper during the time and that the notice was published in the newspaper proper, and

in addition, the first publication being on the day of 19th and the last publication on the day of 19th; that payment for said advertisement has been made, (or (assessed as court costs); that the undersigned has personally appeared before me and is the person in charge of the matters and things set forth in this affidavit.

Robert Trapp
Publisher

Subscribed and sworn to before me this day of A.D., 19⁹⁵

Ruth Shapp
Notary Public

My Commission expires 5-19-97

Printing - SS - Stand Sales

NOTICE OF PUBLICATION

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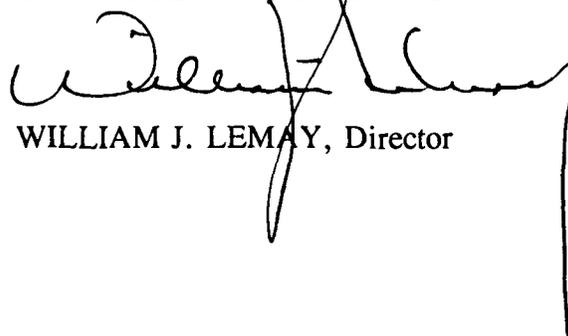
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STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

A handwritten signature in black ink, appearing to read 'William J. Lemay', is written over the typed name. The signature is fluid and cursive, with a long vertical line extending downwards from the end of the name.

WILLIAM J. LEMAY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 11-22-94,
or cash received on _____ in the amount of \$ 100.00

from WILLIAMS FIELD SERVICES CO
for TRUNK 'L' COMPRESSOR STATION (BW-180)
TRUNK 'M' COMPRESSOR STATION (BW-181)

Submitted by: _____ (Facility Name) Date: _____ (DP No.)

Submitted to ASD by: CHRIS EUSTICE Date: 12-30-94

Received in ASD by: AMM Date: 12-30-94

Filing Fee New Facility _____ Renewal _____

Modification _____ Other _____ (specify)

Organization Code 521.07 Applicable FY 95

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

WILLIAMS FIELD SERVICES COMPANY 
ONE OF THE WILLIAMS COMPANIES

As Agent for
Williams Gas Processing Company
P. O. Box 58900
Salt Lake City, Utah 84158-0900

Corestates Bank of Delaware, N.A.
In cooperation with 1st Interstate Bank
62-22
311

DATE	CHECK NO.	NET AMOUNT
11/22/94	[REDACTED]	*****100.00

PAY
ONE HUNDRED AND 00/100 DOLLARS

TO THE
ORDER
OF

NEW MEXICO OIL & GAS CONSV DIV@
STATE LAND OFFICE BUILDING
310 OLD SANTA FE ROAD
SANTA FE, NM
SANTA FE, NM

87504

Williams Field Services Company


VICE PRESIDENT

AUTHORIZED REPRESENTATIVE

WILLIAMS FIELD SERVICES 
ONE OF THE WILLIAMS COMPANIES

P.O. Box 58900
Salt Lake City, UT 84158-0900
(801) 584-7033
FAX: (801) 584-6483

November 8, 1994

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

Re: Discharge Plans for One C.D.P. - San Juan County and
Two Compressor Stations - Rio Arriba County

Dear Mr. Anderson:

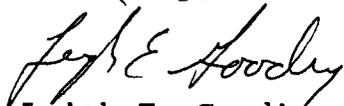
Enclosed please find three copies of the Williams Field Services
Discharge Plans for the following sites:

1. Navajo C.D.P, San Juan County;
2. Trunk L Compressor Station, Rio Arriba County; and
3. Trunk M Compressor Station, Rio Arriba County.

Williams Field Services' engineering section has not yet received
the final engineering drawings for these sites. Site plans will be
forwarded to you as soon as they are finalized. Also enclosed,
please find three checks for \$50.00 each, payable to the New Mexico
Water Quality Management Fund, to cover the application fees for
the above referenced projects.

If you have any questions or require additional information, please
do not hesitate to contact me at (801) 584-6543. Your assistance
in processing these discharge plans is appreciated.

Sincerely,



Leigh E. Gooding, P.G.
Environmental Specialist

Attachments

cc: M. Hall, 2C2

RECEIVED
NOV 16 1994
OIL CONSERVATION DIV.
SANTA FE

RECEIVED
NOV 15 1994
OIL CONSERVATION DIV.
SANTA FE

RECEIVED
NOV 16 1994
OIL CONSERVATION DIV.
SANTA FE

GW-18D

DISCHARGE PLAN

**SAN JUAN GATHERING SYSTEM
TRUNK L COMPRESSOR STATION**

Williams Field Services Company

October 1994

1.0 GENERAL INFORMATION

1.1 Legally Responsible Party

Williams Field Services
P.O. Box 58900, M.S. 2G1
Salt Lake City, Utah 84158-0900
(801) 584-6999

Contact Person

Leigh Gooding
Environmental Specialist
(801) 584-6543
Address, Same as Above

1.2 Location of Discharge

The Trunk L Compressor Station is located SWNW of the SW 1/4 of Section 22, Township 28 North, Range 5 West, Rio Arriba County, New Mexico. A vicinity map is attached (Gobernador, New Mexico) as Exhibit 1. The cleared site for this Compressor Station is approximately 4.4 acres. The site boundary survey is provided in Figure 1.

1.3 Type of Natural Gas Operation

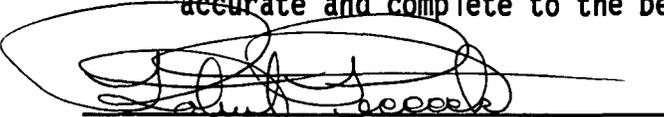
The Trunk L Compressor Station will provide compression services to various producers for the gathering of conventional gas on a contract basis for ultimate delivery through the Ignacio Plant near Durango, Colorado.

Six (1) 990 horse power (site rated), skid mounted, self contained, natural gas fired lean-burn compressor units are currently planned for this site.

This facility is classified as a field compressor station. Consequently there will be no formal office or other support facilities not essential to field compression.

1.4 Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate and complete to the best of my knowledge and belief.



Signature

Robert Peacock

October 28, 1994

Date

Project Manager

2.0 GENERAL PROCESSES

2.1 Process Fluids

Table 1 lists the sources and planned disposition of liquid waste process and fluids with approximations of the quantity and type. Material Safety Data Sheets for glycol and oil used in the equipment were previously provided to OCD by Williams Field Services. For reference, representative samples of washdown wastewater and used motor oil have previously been collected at a typical Williams Field Services compressor station and analyzed for the parameters listed below.

<u>Sample</u>	<u>Parameters</u>
Washdown Wastewater	TDS, pH, BETX, As, Ba, Cd, Cr, Pb, Hg, TOX.
Used Motor Oil	As, Cd, Cr, Pb, TOX, Flash Point

Additional Chemicals listed in WQCC 1-101.44 and 3-103 are not expected to be present in any process fluids or in the coal seam gas transported at the Trunk L Compressor Station

2.2 Spill/Leak Prevention and Housekeeping Procedures

Production Operators, Incorporated (POI) will be contracted to operate and maintain the facility. The facility will be inspected several times per week at a minimum and a POI operator will be on call 24 hours per day, 7 days per week, 52 weeks per year. The facility will be remotely monitored for equipment malfunctions. Production Operators must comply with Williams' spill response procedures.

Environmental Protection will be a contractual obligation as follows:

POLLUTION/HAZARDOUS WASTE. POI shall take all necessary precautions to control pollution of any kind resulting from POI's operation of the compression equipment. At POI's sole cost, all hazardous substances, hazardous wastes and oil will be managed to prevent contamination of property and associated surface and groundwater resources.

POI will comply with all applicable spill reporting and recordkeeping requirements of federal, state and local laws and regulations pertaining to hazardous substances, hazardous wastes and oil. POI shall be responsible for all costs related to the cleanup and disposal of contaminated material as well as personal or property damage resulting from such contamination on said property. Hazardous wastes will be properly stored and disposed of in accordance with applicable state and federal laws and regulations.

TABLE 1

Sources and Disposition of
Process Fluids

<u>Source</u>	<u>Disposition</u>	<u>Quantity</u>	<u>Quality Type</u>	<u>Additives</u>
Compressor Engines	Collected Separately in Tank	125 gal each quarter	Used Motor Oil	None
Gas Inlet Separator	Collected Separately in Blowdown Tank	Variable, available for upsets	High TDS Water	None
Washdown water	Collected Separately in Tank	Intermittent	Rainwater, Tapwater with Traces of Used Motor Oil & TEG	Soap
Lube Oil	Compressor Engines		Motor Oil	None

For overflow containment, tanks on saddle racks are underlain by concrete splash aprons equipped with retainment curbs. Fluids which collect within the curbed area drain through a pipe into a closed containment system. A drip pan will be placed beneath the catwalk adjacent to the oil filter on each compressor unit to contain spillage during maintenance activities.

Spill containment dikes around the bulk storage tanks will contain 1 1/3 volume of the largest vessel. Spill containment is also provided around the tank loading valves. Surface runoff within the site will drain by sheet flow to the east.

Williams 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 will be reported to the OCD pursuant to Rule 116 using the OCD form (see Appendix A).

All pressure vessels on site have been tested in accordance with the requirement of the ASME Boiler and Pressure Vessel Code. All interconnecting gas piping on site has been tested in accordance with the requirements of the ASME Code for Pressure Piping, B31.8 Gas Transmission and Distribution Piping Systems.

2.3 Disposal of Waste Fluids

The disposition of waste fluids is described in Table 1 of Section 2.1.

Used motor oil is collected in a closed-piping system from each individual unit to a common above-ground collection tank and trucked from the site by an EPA-registered used oil marketer or recycler.

Washdown wastewater from engine deck plates is collected in a closed piping system directly to the wastewater storage tank and disposed of at a commercial facility authorized by the NMOCD.

Porta-pottys present at this facility will be serviced under a contract requiring proper sewage disposal in accordance with applicable laws and regulations.

3.0 Site Characteristics

A. Hydrologic Features

The Trunk L Compressor Station is located in the SW 1/4 of Section 22, Township 28 North, Range 5 West, Rio Arriba County, approximately twenty-six miles east-southeast of Blanco, New Mexico. The graded site elevation is approximately 6,745 feet above sea level. The undeveloped site is covered by sagebrush, crested wheat grass, and native grasses. The site is underlain by quaternary alluvium which has been deposited over the sandstones and shales of the Nacimiento Formation.

The site is located on a gentle west-facing slope approximately 0.6 mile southwest of Trujillo Reservoir. The reservoir is located at an elevation of approximately 6650 feet. Based on the elevation of the reservoir, the expected depth to groundwater at the subject site is 95 feet below ground surface. A review of the available hydrologic data for this area revealed that the closest documented source of ground water downgradient from the subject site is the alluvial deposits of an unnamed ephemeral stream channel. Th channel is located approximately 1,000 feet southwest of the subject site at an elevation of approximately 6700 feet. Ground water within these alluvial deposits flows northwest toward the San Juan River and is expected to have a total dissolved solids (TDS) concentration of approximately 2,000 mg/l. 45'

The nearest identified ground water well is owned by El Paso Natural Gas (SJ-0200) and is located in the SW 1/4 of Section 28, Township 28 North, Range 5 West at an elevation of approximately 6570 feet. An industrial well owned by Mamie Mangum (SJ-0036) is also located in the SW 1/4 of Section 28, but at an unspecified location and elevation. The industrial well was reportedly screened from 260 to 285 feet. Both these wells are located downgradient of the subject site. In addition, one BLM well is located in the NW 1/4 of Section 22, Township 28 North, Range 5 West at an elevation of approximately 6660 feet.

¹ Klausung, R.L. and G.E. Welder, "Availability of Hydrologic Data in San Juan County, New Mexico:", U.S.G.S. Open-File Report 84-608, 1984.

Lyford, F.P., "Ground Water in the San Juan Basin, New Mexico and Colorado", U.S.G.S. Water-Resource Investigations 79-73, May, 1979.

Stone, W.J., F.P. Lyford, P.F. Frenzel, N.H. Mizel, E.P. Padgett, "Hydrogeology and Water Resources of San Juan Basin, New Mexico", Hydrologic Report 6, New Mexico Bureau of Mines & Mineral Resources, 1983.

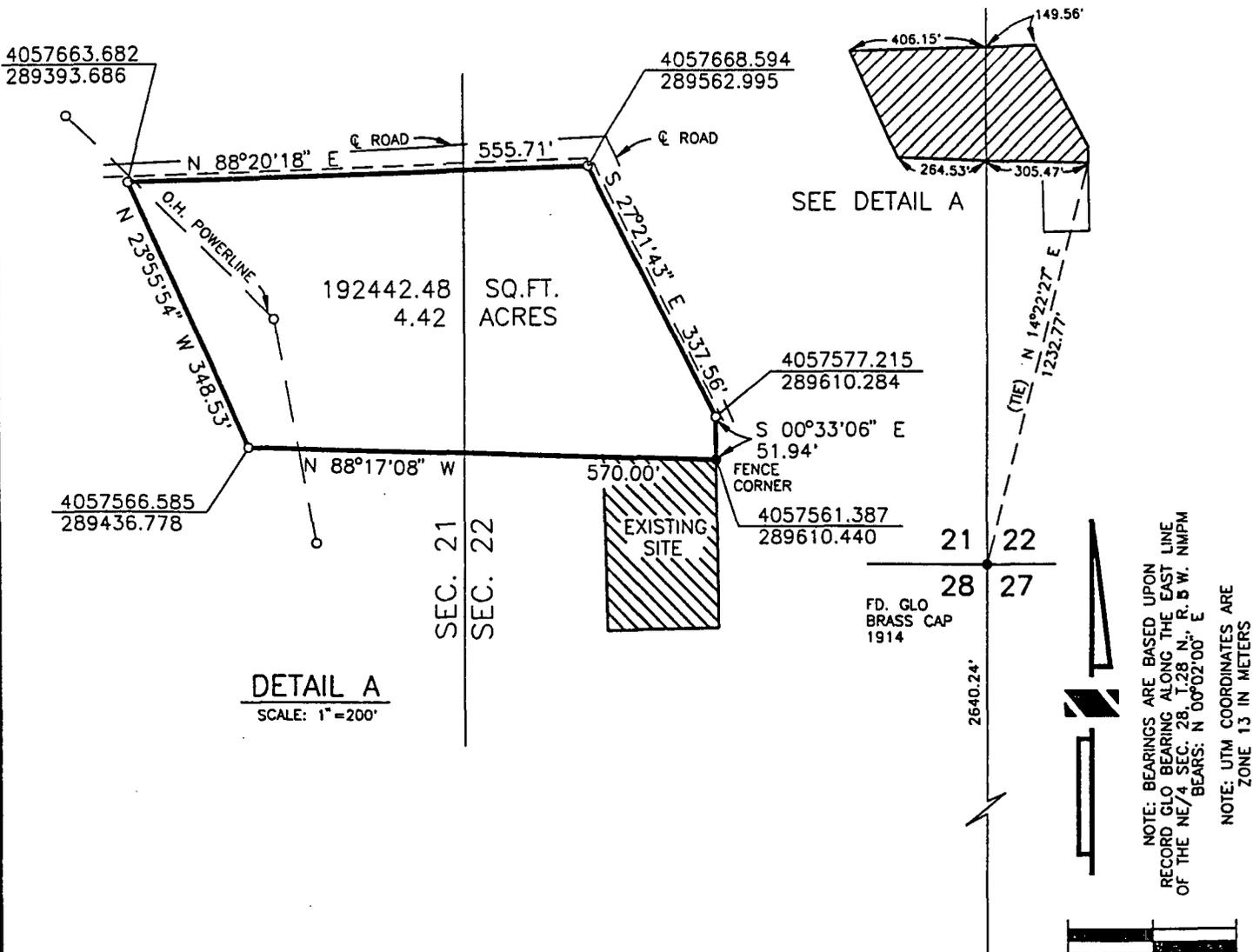
B. Flood Protection

After final excavation and grading are complete, surface water runoff from the area surrounding the site will be diverted around the site into the natural drainage path.

FIGURE 1
SITE BOUNDARY SURVEY

MANZANARES GATHERING SYSTEM
 LINE GOVERNADOR COMPRESSOR SITE EXPANSION
 FROM _____
 COUNTY RIO ARRIBA STATE NEW MEXICO
 SECTION 21 & 22 TOWNSHIP 28-N RANGE 5-W

WILLIAMS FIELD SERVICES
 SCALE 1" = 500' DWG. NO. _____
 DRAWN BY: P.B. DATE 9/29/94
 CHECKED BY: L.M.T. SURVEYED 9/22/94
 APPROVED: _____ W.O. NO. _____
 APPROVED: _____ R/W NO. _____



CERTIFICATE OF SURVEYOR

I HEREBY CERTIFY THAT THIS PLAT IS A TRUE REPRESENTATION OF A SURVEY MADE BY ME OR UNDER MY DIRECT SUPERVISION, AND THE SAME IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Jerry L. Jeffries
 JERRY L. JEFFRIES
 NEW MEXICO L.S. # 8336

DESIGN FACTOR							
DESIGN PRESSURE							
TEST PRESSURE							
MAOP	MINIMUM:	ACTUAL:		MAXIMUM:			
	OWNER	LEASE	FEET	MILES	ACRES	RODS	
Ownership	SUBDIVISION						
	SE/4 SEC.21				4.42		
	SW/4 SEC.22						
Rev.							

APPENDIX A
SPILL CONTROL PROCEDURES

OPERATIONS

Manual O & M Procedure	Department	
Section Safety/General	Tab 10	Document No. 21.10.020
Effective Date 4-10-93	Issue No. 1	Page No. 1 of 6

Subject of Title
DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

A. PURPOSE AND SCOPE

- A.1 To establish the policy and procedure for preventing, controlling, and reporting of spills or discharges 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).
- A.2 This document pertains to Company personnel and 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.

B. CONTENTS

C. POLICY

- C.1 General
- C.2 Bulk Storage Tanks
- C.3 Facility Drainage
- C.4 Transfer Operations, Pumping, and In-Plant/Station Process
- C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack

D. PROCEDURE

- D.1 Identifying, Containing and Initial Reporting of a Discharge or Spill of a Hazardous or Toxic Substance
- D.2 Submitting Written Notification of a Discharge or Spill

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

C. POLICY

C.1 GENERAL

- C.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.
- C.1.2 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

Supersedes Policy and Procedure 12.10.020 dated July 7, 1989.

Approval (Page 1 Only) <i>[Signature]</i>	Approval (Page 1 Only) <i>[Signature]</i> 6/14/93	Approval (Page 1 Only) <i>[Signature]</i> B. C. England
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FORM 1711 (1/92)

OPERATIONS

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- C.1.3 The term hazardous substance does not include petroleum, including crude oil or any fraction thereof, which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.4 Oil, for the purpose of this document, means oil of any kind or in any form, including but not limited to petroleum, fuel oil, Y grade, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) are not considered to be oil.
- C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the required 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.
- C.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.
- C.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 hazardous substance storage vessels 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.
- C.1.8 The facility supervisor 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 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.
- C.1.9 Each individual facility is checked by the supervisor 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.

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- 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. A 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.

C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at annual scheduled intervals for accumulation of liquid hydrocarbons or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

C.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 material 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.

C.2.2 The facility supervisor should evaluate level monitoring requirements to prevent tank overflow.

C.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.

C.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.

C.3 FACILITY DRAINAGE

C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from dike 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.

C.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.

C.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.

C.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.

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

C.3.5 Other means of containment or spill control include, but are not limited to:

- a. Berms or retaining walls;
- b. Curbing;
- c. Culverting, gutters, or other drainage systems;
- d. Weirs, booms, or other barriers;
- e. Spill diversion ponds or retention ponds;
- f. Sorbent materials

C.4 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT/STATION PROCESS

C.4.1 Aboveground valves and pipelines should be examined annually 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.

C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK

C.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.

C.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.

C.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 which 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.

D. PROCEDURE

D.1 IDENTIFYING, CONTAINING AND INITIAL REPORTING OF A DISCHARGE OR SPILL OF OIL OR HAZARDOUS SUBSTANCE

Any Employee

D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity initiates immediate containment procedures and notifies facility supervisor.

NOTE: Refer to Attachment A for containment procedures.

Facility Supervisor

D.1.2 Contacts Gas Control and responsible Director 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. Name, title, and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
- d. Action taken or being taken to mitigate and correct discharge or spill
- e. Water bodies or streams involved
- f. Time and duration of discharge or spill
- g. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)

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Gas Control Personnel

- D.1.3 Advises Environmental Services 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 Supervisor and Environmental Services are immediately contacted to begin containment and clean-up of the discharge or spill.

- D.1.4 If Environmental Services cannot be contacted, notifies Director over Environmental Services.

Facility Supervisor

- D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director informed.

- D.1.6 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).

- D.1.7 Advises Environmental Services 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 Services

- D.1.8 Contacts Legal Department (and Right-of-Way Department, if appropriate) and assesses reporting requirements to state and federal agencies. (See Emergency Operating Procedure Manuals).

- D.1.9 Makes appropriate contacts with U.S. Coast Guard and state agencies when necessary.

- D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Supervisor

- D.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.

- D.2.2 Forwards the completed report to Environmental Services and a copy to Legal Department. Retains a copy for future reference.

NOTE: Environmental Services, in coordination with the Legal Department, submits written reports to government agencies.

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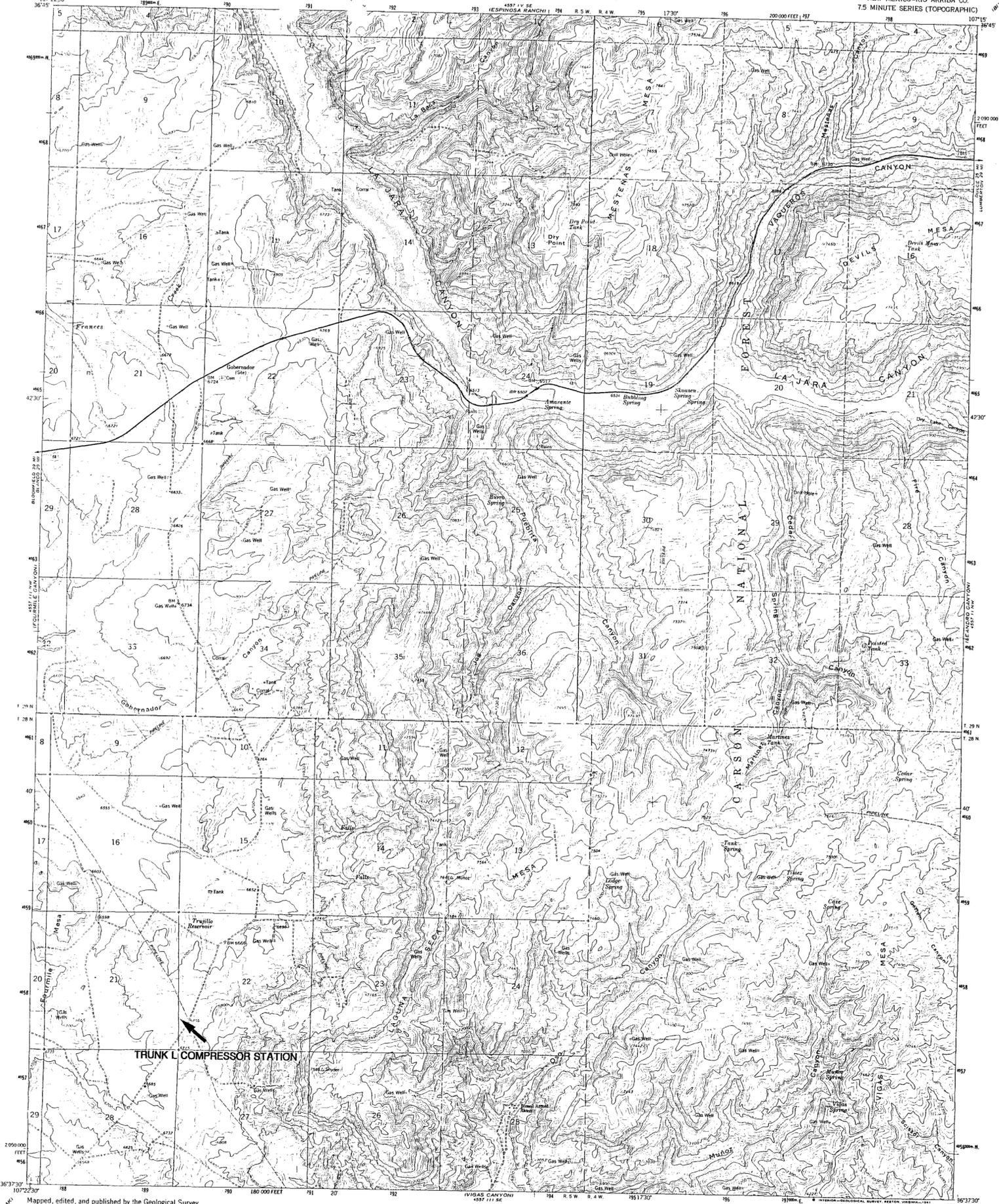
ATTACHMENT A

Discharge or Spill Containment Procedures and Materials

Type of Facility where the Discharge or Spill occurs	Containment Procedures	Material Used for Containment
A. Oil Pipeline (as defined in C.1.4)	<ol style="list-style-type: none"> 1. Closes appropriate block valves. 2. Contains discharge or spill by: ditching covering, applying sorbents, constructing an earthen dam, or burning. 3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. 	<ol style="list-style-type: none"> 1. Straw 2. Loose Earth 3. Oil Sorbent - 3M Brand 4. Plain Wood Chips 5. Sorb - Oil Chips Banta Co. 6. Sorb - Oil Swabs - Banta Co. 7. Sorb - Oil Mats - Banta Co. 8. Or Equivalent Materials.
B. Vehicle	<ol style="list-style-type: none"> 1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, applying sorbents, or burning. 2. Notifies immediately the Compliance and Safety Department and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials. 3. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. <p>NOTE: Any vehicle carrying any hazardous or toxic substance will carry a shovel or other ditching device to contain a spill. If the vehicle has sufficient room, sorbent materials should also be carried.</p>	
C. Bulk Storage Tanks or any other Facilities	<ol style="list-style-type: none"> 1. Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning. 2. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning. 	

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

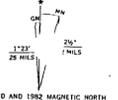
GOVERNADOR QUADRANGLE
NEW MEXICO—RIO ARRIBA CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)



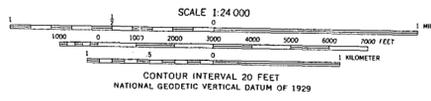
Mapped, edited, and published by the Geological Survey
Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial
photographs taken 1958 and 1962. Field checked 1963.
Polyconic projection, 1927 North American Datum
10,000-foot grid based on New Mexico coordinate system, central zone
1000-meter Universal Transverse Mercator grid ticks,
zone 13 shown in blue.

Entire area is within the San Juan Basin Gas Field.
Certain land lines are omitted because of insufficient data.
There may be private inholdings within the boundaries
of the National or State Reservations shown on this map.



To place on the predicted North American Datum 1983
move the projection lines 2 meters north and
54 meters east as shown by dashed corner ticks.



CONTOUR INTERVAL 20 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

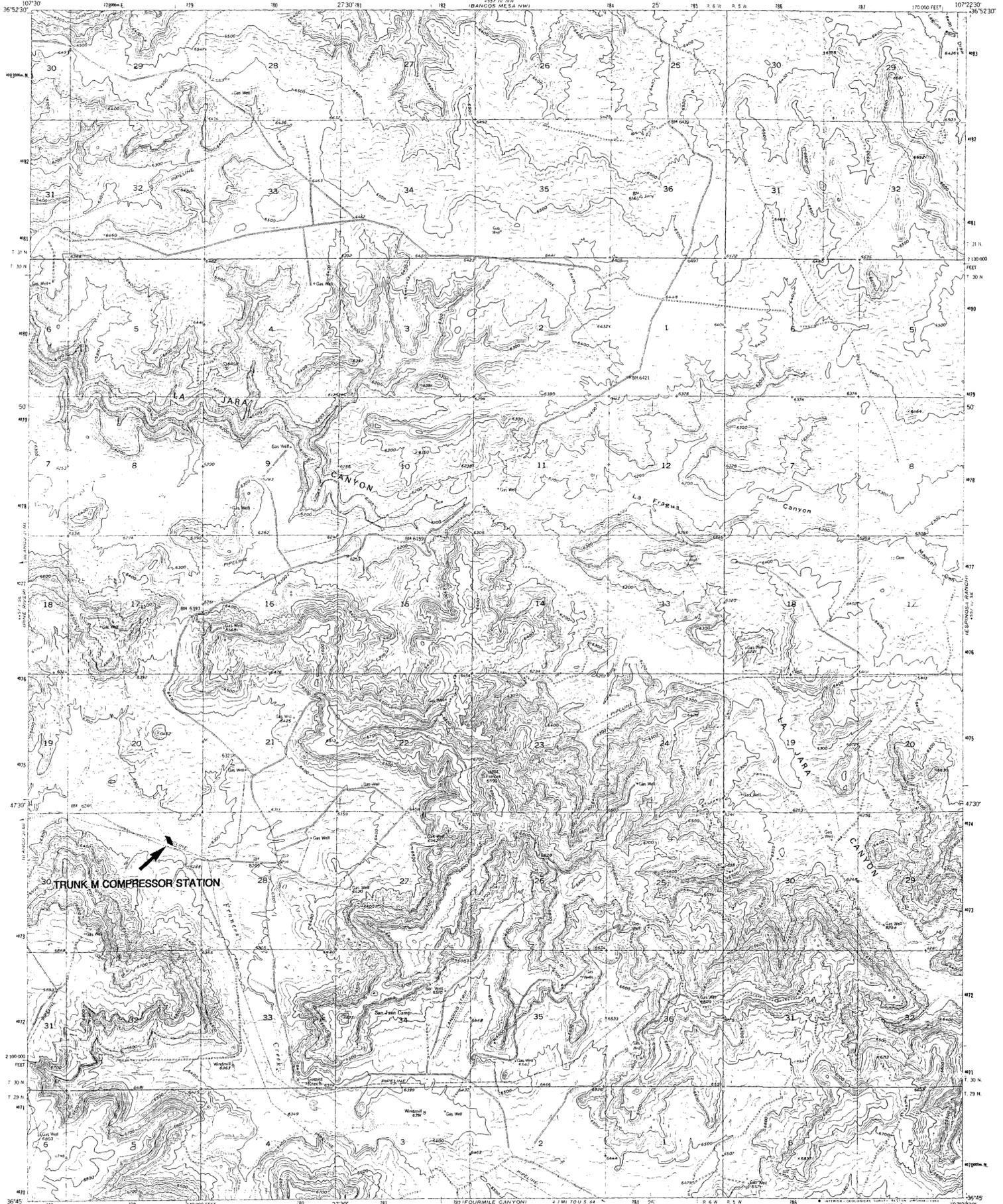
ROAD CLASSIFICATION

Primary highway, hard surface	Light duty road, hard or improved surface
Secondary highway, hard surface	Unimproved road
Interstate Route	U.S. Route
	Slate Route

GOVERNADOR, N. MEX.
36107 F3-1F-024
1963
PHOTOREVISED 1982
DMA 4557 III, HC-86953 V881

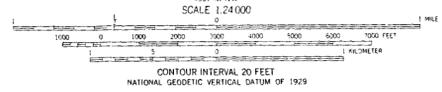
THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions shown in purple compiled from aerial
photographs taken 1981 and other source data. Partial
field check by U.S. Forest Service. Map edited 1982



Maped, edited, and published by the Geological Survey
Control by USGS and NOS/NOAA
Topography by photogrammetric methods from
aerial photographs taken 1950. Field check 1954
Polyconic projection 1927 North American datum
10,000-foot grid based on New Mexico coordinate system,
central zone
1000-meter Universal Transverse Mercator grid ticks,
zone 13, shown in blue
UTM GRID AND 1982 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET
To place on the predicted North American Datum 1983
move the projection lines 2 meters north and
54 meters east as shown by dashed corner ticks

UTM GRID AND 1982 MAGNETIC NORTH
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THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
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A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions shown in purple and woodland compiled from
aerial photographs taken 1951 and other source data
Partial field check by U. S. Forest Service. Map edited 1982

ROAD CLASSIFICATION
Light-duty ————— Unimproved dirt

GOMEZ RANCH, N. MEX.
N3645—W10722.5/7.5
1954
PHOTOREVISED 1982
DMA 4557 IV SW—SERIES V981