GW - 210

PERMITS, RENEWALS, & MODS Application

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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	2040 SOUTH PACHECO SANTA FE NM 87504	VICE PRESIDENT	
		AUTHORIZED REPRESENTATIVE	

OIL CONSERVATION DIVISION

ND NATURAL NESOURCES DEPARTME

July 20, 1995

CERTIFIED MAIL RETURN RECEIPT NO. Z-765-962-721

Ms. Leigh E. Gooding Williams Field Services P.O. Box 58900, M.S. 2G1 Salt Lake City, Utah 84158-0900

EXICO ENERGY

RE: Discharge Plan GW-210 Hampton Straddle Compressor Station San Juan County, New Mexico

Dear Ms. Gooding:

The NMOCD has received the proposed Hampton Straddle Compressor Station discharge plan application for the facility located in SW/4 SE/4, Section 11, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico. The application filing fee in the amount of \$50 was received by the NMOCD along with the discharge plan application. The NMOCD has prepared and sent out the public notice for the Hampton Straddle Compressor Station facility as stated in WQCC section 3-108. NMOCD has conducted a preliminary review of the proposed discharge plan as received from Williams Field Services on July 7, 1995.

The following comments and request for additional information are based on the review of the Williams Field Services Compressor Station application. Please note that unless otherwise stated, Williams Field Service response to all comments shall be received and reviewed by the OCD prior to approval of the discharge plan application.

I. Under 2.1 Process Fluids

- A. What were the results of previous tests conducted on similar waste streams? Provide the OCD with a copy of these analytical results for the GW-210 file.
- II. Under 2.2 Spill/Leak.....
 - A. Williams Field Services should consider the elimination of the word HAZARDOUS WASTE and simply use WASTE as it is unknown that wastes generated at this facility are hazardous-in fact most wastes are exempt.

 OFFICE OF THE SECRETARY - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-5950 ADMINISTRATIVE SERVICES DIVISION - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-5955 ENERGY CONSERVATION AND MANACEMENT DIVISION - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-5950 FORESTRY AND RESOURCES CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-5950 MINING AND MINERALS DIVISION - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-5950 OIL CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-5970 OIL CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-7970 OIL CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-7970 OIL CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FL, NM 87505-6429 - (505) 827-7131 PARK AND RECREATION DIVISION - P. O. BOX 6419 - SANTA FL, NM 87505-6429 - (505) 827-7465

Ms. Leigh E. Gooding July 20, 1995 Page 2

- Β. Williams Field Services needs to make certain that exempt and non-exempt waste streams are not commingled if the waste is to be disposed of down a class II injection well. Also, non-exempt streams need to be characterized for hazardous constituents.
- C. Include a diagram showing equipment layout and waste streams generated at the proposed facility. This will be included as Figure 4. "Site Layout".

III. Under 2.3 Disposal of Waste Fluids

- Α. Upon disposal of the fluid waste streams-make certain that non-exempt streams have been characterized for hazardous constituents.
- Β. Provide a more detailed description of the proposed below grade tank shown in Figure 3 - include installation/construction procedure as well as engineering design parameters - such as strength of the material/shell and material compatibility to the fluids and temperature range the tank will be exposed.
- C. Is the gas-inlet scrubber a two or three phase separation unit? If the unit is three phase where will the liquid hydrocarbon go and where will the produced water go? Note: this stream shall not be commingled with washdown water if the produced water goes to a class II disposal well.

Submittal of the requested information and commitments in a timely fashion will expedite the final review of the application and approval of the discharge plan.

If you have any questions, please feel free to call me at (505)-827-7156.

Sincerely, Patricio W. Sanchez

Petroleum Engineer

xc: Dr. Denny Foust - Environmental Representative District III

RECEIVED

JUL 0 7 1995

Environmental Bureau Oil Conservation Division

DISCHARGE PLAN

Giw-210

TORRE ALTA GATHERING SYSTEM HAMPTON STRADDLE COMPRESSOR STATION

Received July 10, 1995 by PNG for Review.

Williams Field Services Company

June 1995

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) 584-6543

Contact Person

Ms. Leigh E. Gooding, Environmental Specialist Phone and Address, Same as Above

1.2 Location of Discharge

The Hampton Straddle Compressor Station will be located in the SW/4 SE/4 of Section 11, Township 30 North, Range 11 West, San Juan County, New Mexico. A Site Location map is attached (USGS 7.5 Min. Quadrangle: Aztec, New Mexico) as Figure 1. The cleared site for this Compressor Station is 0.92 acre. The site boundary survey is provided in Figure 2.

1.3 Type of Natural Gas Operation

The Hampton Straddle Compressor Station will provide compression services to various producers for the gathering of conventional gas on a contract basis for ultimate delivery through the Kutz Plant in Bloomfield, New Mexico.

Two (2) Waukesha 7042GL lean-combustion natural gas fired reciprocating engines, site-rated at 1164 hp are currently planned for this site. Both units are skid-mounted and self contained.

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

<u>6 · 26 · 95</u> Date

Manager, Environmental, Health & Safety

Terry G. Spradlin

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 antifreeze and oil used in the equipment were previously provided to New Mexico Oil Conservation Division (OCD) by Williams Field Services (WFS). For reference, representative samples of washdown wastewater and used motor oil have previously been collected at a typical WFS compressor station and analyzed for the parameters listed below.

<u>Sample</u> Washdown Wastewater <u>Parameters</u> TDS, pH, BTEX, As, Ba, Cd, Cr, Pb, Hg, TOX.

Used Motor Oil

As, Cd, Cr, Pb, TOX, Flash Point

Analytical results found that washdown water did not exhibit any of the hazardous characteristics and used oil was suitable for recycling. Additional Chemicals listed in WQCC 1-101.ZZ and 3-103 are not expected to be present in any process fluids or in the conventional gas transported at the Hampton Straddle Compressor Station.

2.2 <u>Spill/Leak Prevention and Housekeeping Procedures</u>

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 WFS's spill response procedures. In the event of a release of a reportable quantity, POI will immediately notify WFS's Environmental Services Department and WFS will report the release to OCD. WFS 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.

Environmental Protection will be a contractual obligation as follows:

<u>POLLUTION/WASTE</u> 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, wastes and oil will be managed to prevent contamination of property and associated surface and groundwater resources.

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.

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TABLE 1

Sources and Disposition of Process Fluids

Source	<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



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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 west.

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

All pressure vessels on site will be tested in accordance with the requirement of the ASME Boiler and Pressure Vessel Code. All interconnecting gas piping on site will be 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 OCD. Based on volumes recorded at similar WFS facilities, approximately 100 barrels of wastewater is expected to be hauled off site each month.

Porta-pottys present at this facility will be serviced under a contract requiring proper sewage disposal in accordance with applicable 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 Used Oil Tank	125 Gal Each Quarter	Used Motor Oil	None
Gas Inlet Separator	Collected Separately in Condensate Tank	Variable, Available for Upsets	High TDS Water and Condensate	None
Washdown Waste Water/ Rainwater	Collected Separately in Wastewater Tank	Varies With Season	Rainwater and Tapwater with Traces of Used Motor Oil & TEG	Soap
Lube Oil	Compressor Engines	Intermittent	Motor Oil	None
Antifreeze	Compressor Engines	Intermittent	Triethylene Glycol	None



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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 west.

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

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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.

All liquids from the gas-inlet scrubber will discharge to an above-ground condensate storage tank and will be trucked from the site as needed.

A below-grade waste water sump will be installed 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. Waste water accumulations will be transferred from the inner tank to a vacuum truck and removed from site to a commercial facility authorized by the OCD. An eight-inch inspection port will be installed within the outer tank for visual inspection. A schematic drawing of the sump is attached as Figure 3.

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 <u>Site Characteristics</u>

A. <u>Hydrologic Features</u>

The Hampton Straddle Compressor Station is located in the SW/4 SE/4 of Section 11, Township 30 North, Range 11 West, San Juan County, approximately 2 kilometers east of Aztec, New Mexico. The graded site elevation is approximately 5,840 feet above mean 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 in the Hampton Arroyo approximately two miles southeast of the Animas River. The river is located at an elevation of approximately 5,600 feet. A review of the available hydrologic data¹ for this area revealed that the closest documented source of ground water downgradient of the subject site is the alluvial deposits of an unnamed wash located 100 feet west of the subject site at an elevation of approximately 5,840 feet. Ground water within these alluvial deposits flows west toward the Animas River and is expected to have a total dissolved solids (TDS) concentration of approximately 2,000 mg/l.

The nearest identified ground water wells are domestic wells SJ-1693, SJ-1672, and SJ-1294. All three wells are located in the NW 1/4 of Section 13, Township 30 North, Range 11 West at an approximate elevation of 5,980 feet. The depth of these wells ranges from 92 to 225 feet. Based on the elevation and depths of the wells, the expected depth to groundwater at the subject site is approximately 50 feet below ground surface.

B. <u>Flood Protection</u>

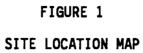
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After final excavation and grading are complete, surface water runoff from the area surrounding the site will be diverted around the site into the natural drainage path.

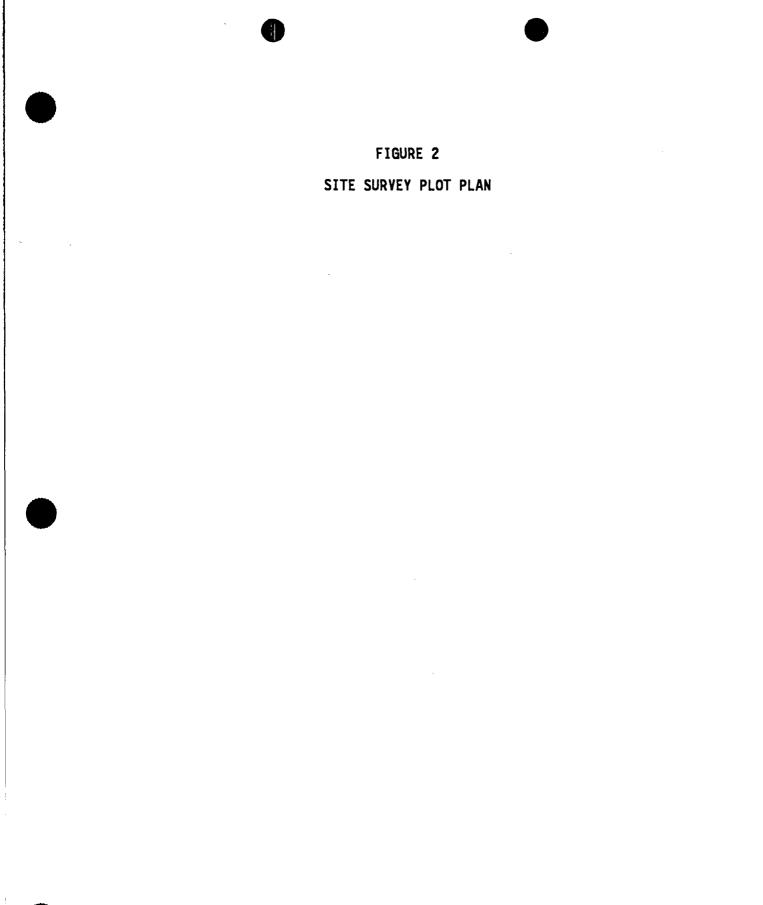
Klausing, R.L. and G.E. Welder, "Availability of Hydrologic Data in San Juan County, New Mexico:, U.S.G.S. Open-File Report 84-608, 1984.

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.









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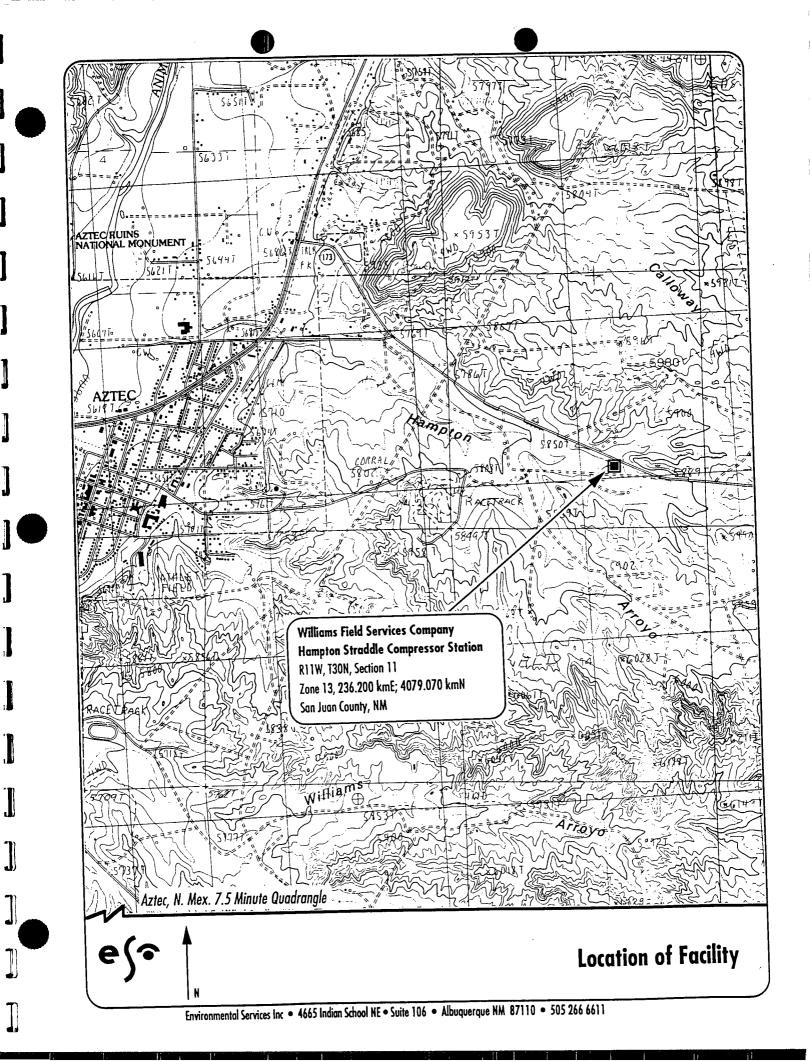
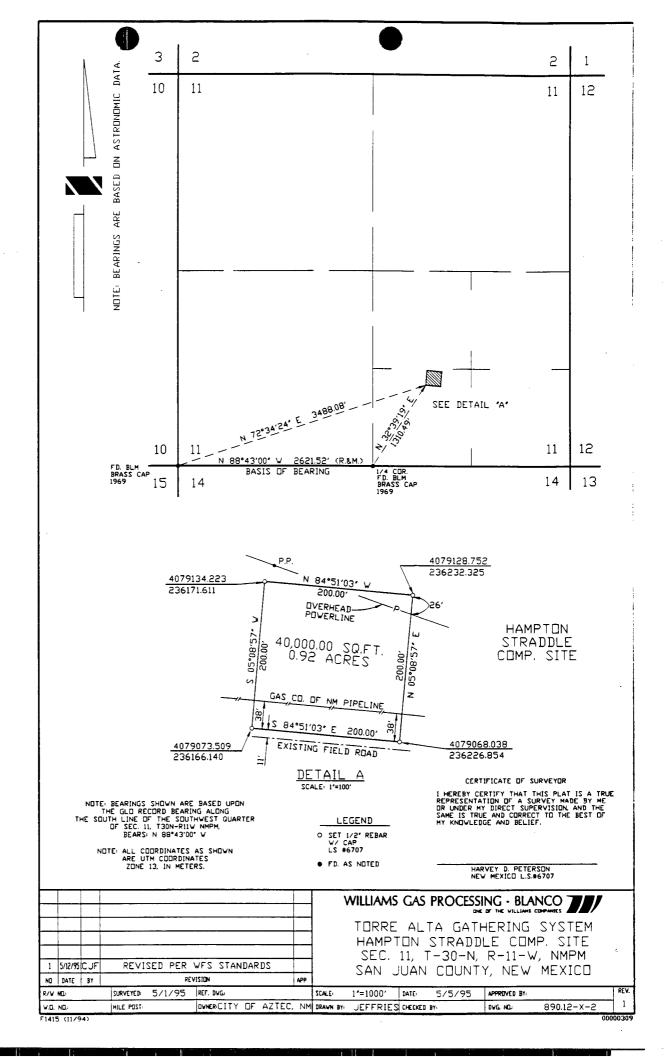


FIGURE 2

SITE SURVEY PLOT PLAN



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FIGURE 3 BELOW-GRADE WASTEWATER SUMP

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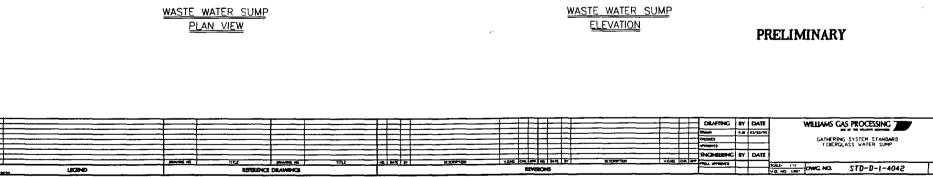
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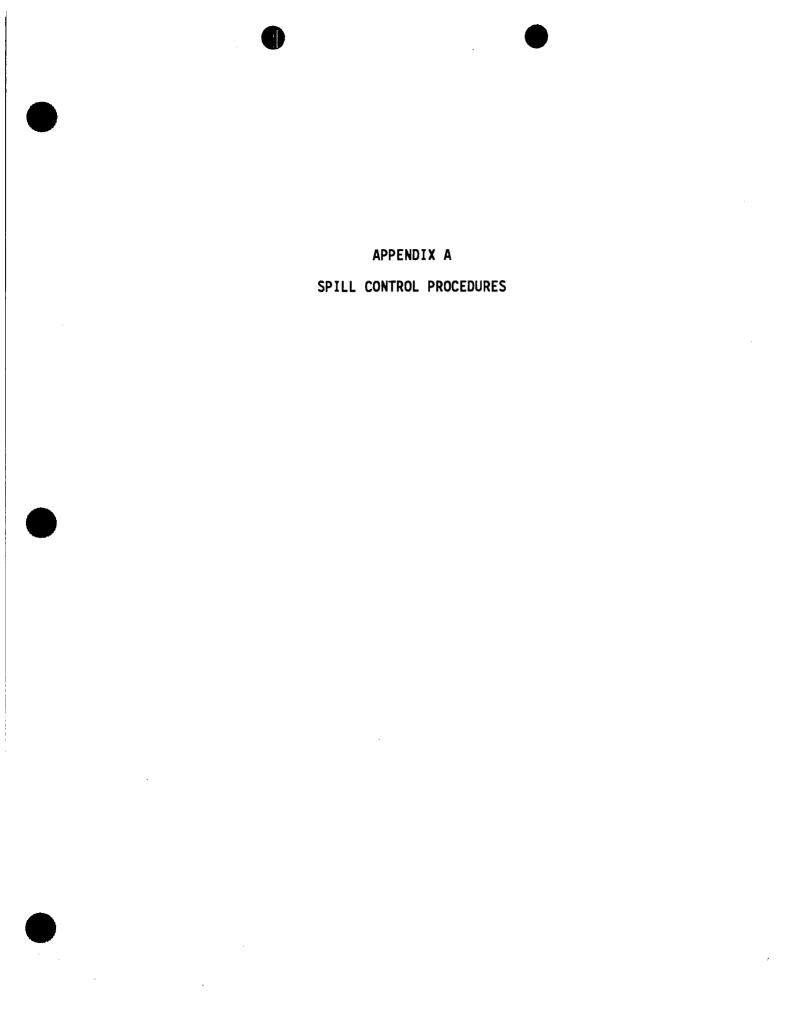
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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

- 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).
- λ.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 applicaton of the standards; however, variations from the standards should be approved by the responsible Director.

B. <u>CONTENTS</u>

- 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 $311(b)(2)(\lambda)$ 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.

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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.
 - 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 agencys that must be notified in case of a spill.
 - 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.
 - 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.

C.1.8

C.1.9

C.1.7



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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 pecipitation, 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 <u>IDENTIFYING, CONTAINING AND INITIAL REPORTING OF A DISCHARGE OR SPILL OF OIL OR HAZARDOUS</u> SUBSTANCE

<u>Anv Employee</u>

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 <u>immediately</u> 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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DISCHARGES OR SPILLS OF OIL OR HAZARDOUS SUBSTANCES; Preventing, Controlling and Reporting of

Gas Control Personnel

- D.1.3 Advises Environmental Services departments <u>immediately</u> 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.

WILLIAMS FIELD SERVICES COMPANY ONE OF THE WILLIAMS COMPANIES OPERATIONS

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

ATTACHMENT A

Discharge or Spill Containment Procedures and Materials

Type of Facility where the Discharge or Spill occurs		Containment Procedures		aterial Used Containment
A. Oil Pipeline (as defined in C.1.4)	2.	Closes appropriate block valves. Contains discharge or spill by: ditching covering, applying sorbents, constructing an earthen dam, or burning. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	2. 3. 4. 5. 6. 7.	Straw Loose Earth Oil Sorbent - 3M Brand Plain Wood Chips Sorb - Oil Chips Banta Co. Sorb - Oil Swabs Banta Co. Sorb - Oil Mats Banta Co. Or Equivalent Materials.
B. Vehicle	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; notifie immediately the highway patrol or local police officials.	6	
	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 show or other ditching device to contain spill. If the vehicle has sufficien rcom, sorbent materials should also carried.	a it	
c. Bulk Storage Tanks or any other Facilities		Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning. If burning is required, obtains approval		
		from the appropriate state air quality control government agencies before burning.		

APPENDIX B

OCD NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS AND WQCC 1-203 NOTIFICATION OF DISCHARGE

DISTRIC			
P.O.Box	1980,	Hobbs, NM	88241-1980

DISTRICT II P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd, Aziec, NM 87410

Energy, Minerals and Natural Resources Department **OIL CONSERVATION DIVISION**

State of New Mexico

1 1 2

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 BLOW	OUTS

OPERATOR					· · · ·	AD	DRESS			TELEPHONE #	
REPORT FIRE OF	BREA	K	SPILL		LEAK		BLOWOUT	OTI	IER*		
TYPE OF DRLG		3	NK	PIPE	GAS		OIL	OTI	IER•		
FACILITY WELL	WEL	L B1	RY	LINE	PLN	т	RFY			· · · · · · · · · · · · · · · · · · ·	
FACILITY NAME:						· .					
LOCATION OF FAC							SEC.	TWP.	RGE.	COUNTY	
Qtr/Qtr Sec. or Foota											
DISTANCE AND DI			EST								
TOWN OR PROMIN	ENI LANDA	MAKK				DATE					
OF OCCURRENCE							AND HOUR	,			
WAS IMMEDIATE	YES	N	0	NOT RE	-	OF DISCOVERY IF YES,					
NOTICE GIVEN?			-	QUIREI		TOWH					
BY						DATE					
WHOM						AND HOUR					
TYPE OF						QUAN			VOLUME RI	E-	
FLUID LOST	FACU	YES	NO		OUNT	OF LOS	<u>SS</u>		COVERED		
A WATERCOURSE		1 223	NO		QUANT	11.1					
IF YES, DESCRIBE					<u> </u>				<u> </u>		
DESCRIBE CAUSE	OF PROBLE	M AND RE	MEDIAL	ACTION	FAKEN**						
									- -		
DESCRIBE AREA	FFECTED A	ND CLEAN	NUP ACTI	ON TAKE	N**					<u> </u>	
					•					·	
DESCRIPTION	FARMIN	G	RAZING		URBAN		OTHE	R*			
OF AREA	CANDY	CANT	v	CLAY	1	DOCH	v 1		DAV	SNOW	
SURFACE CONDITIONS	SANDY	SAND		CLAY		ROCK	.I V	VET	DRY	SNOW	
DESCRIBE GENER	AL CONDIT		-	TEMPER	ATURE P	RECIPIT	TATION ETC	.)**	l		
								···,			
I HEREBY CERTIF	Y THAT THI	E INFORM	ATION AE	OVE IS T	RUE AND	COMP	LETE TO TH	E BEST OF	MY KNOWL	EDGE AND BELIEF	
I HEREBY CERTIF	Y THAT TH	E INFORM	ATION AB	OVE IS T	RUE AND	COMP	LETE TO TH	E BEST OF	MY KNOWL	EDGE AND BELIEF	
I HEREBY CERTIF	Y THAT THI	E INFORM	ATION AB		RUE AND		LETE TO TH	E BEST OF	MY KNOWL	EDGE AND BELIEF	

+encortev



A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or costrolling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gav well, any injection or disposal well, and any drilling or vorkower well; any pipe line through which crude oil, condensate, casinghead or netural gas, or injection or disposal fluid (gammaus or liquid) is gethered, piped, or transported (including field flow-lines and lead-lines but not including netural gas distribution systems); any receiving test, holding test, or stores test, or receiving and storing received, roosted any injection or disposal fluid, or casinghead or netural gas is produced, received, any injection or disposal fluid, or casinghead or netural gas is produced, received, any injection or disposal gamping or casinghead or netural gas is produced, received, or stores) any injection or disposal gamping or casinghead or netural gas is processed or refined; and any test or drilling plant is which crude oil, condensate, or casinghead or netural gas is processed or refined; and any test or drilling plant is which crude oil, condensate, or casinghead or netural gas is processed or refined; and any test or drilling plant is which crude oil, condensate, or casinghead or netural gas is processed or refined; and any test or drilling plant is which crude oil, condensate, or casinghead or netural gas is processed or refined; and any test, or drive also be plant or a sum pit associated with oil or gas well or injection or disposal well drilling operations or any test, storege pit, or post associated with oil or gas production or processing operations or with injection or disposal operations and containing bydrocarbons or bydrocarbon wate or residue, salt weter, strong counties or strong scids, or other deletarious chemicals or hereful contaminents.

C. Rotification of such fire, break, lask, spill, or blowout shall be in accordance with the provisions set forth balow:

(1) <u>Well Blowouts</u>. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workower well, or the rupture of the casing, casingheed, or wellheed or any oil or gas well or injection or disposed well, whether active or inactive, accompanied by the suddem emission of fluids, gaseous or light, from the well.)

(2) "Wartor" Breaks, Spills, or leaks. Notification of breaks, spills, or leaks of 25 or more barrals of crude oil or condensets, or 100 barrals or more of salt veter, none of which reaches a wetercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrals of crude oil or condensets or 25 barrals of salt veter does reach a vetercourse or enters a stream or lake; and breaks, spills, or leaks of bydrocarbons or bydrocarbon vests or residue, salt veter, stream crustics or strung scide, genes, or other delatarious chemicals or barwful contaminents of any monitode which may with reasoble probability endancer bount bealth or result in substantial demoge to property, shall be "immediate notification" described below.

(3) "<u>Minor</u>" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 berrels or more but less than 25 berrels of crude oil or condensets, or 25 berrels or more but less than 100 berrels of salt water, none of which reaches a wetercourse or esters a stress or lake, shall be "subsequent notification" described below.

(4) "Gas Leeks and Gas Line Branks. Notification of gas leeks from any source or of gas pipe line breaks in which natural or casingheed gas of any quantity has escaped or is escaping which may with reasonable probability emission health or result in substantial densge to property shall be "immediate polification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of patural or casingheed gas but in which there is no denger to human health nor of substantial densge to property shall be "subsequent polification" described below.

(5) <u>Tenk Fires</u>. Notification of fires in tanks or other receptacies caused by lightning or any other cause, if the loss is, or it appears that the loss will be, Z5 or more barrels of crude all or condensate, or fires which may with reasonable probability endemore human bealth or result in substantial demoge to property, shall be "immediate notification" as described balow. If the loss is, or it appears that the loss will be at least 5 berrels but less than 25 berrels, notification shall be "subsequent notification" described balow.

(6) <u>Drilling Pits. Slush Pits. and Storeve Pits and Popds</u>. Notification of breaks and spills from any drilling pit. slush pit, or storege pit or pood in which any hydrocarbon or hydrocarbon wasts or ramidus, strong caustic or strong acid, or other deletarious chamical or hermful contaminant endengers human bealth or does substantial surface damage, or reaches a wetercourse or enters a stream or lake in such quantity as may with reascoable probability endanger buman bealth or result in substantial damage to such wetercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such amplitude as to not endanger human bealth, cause substantial surface damage, or result in substantial damage to any wetercourse, or lake, or the contents thereof, shall be "immediate notification" described below, Notification of breaks or spills of such any vetercourse, stream, or lake, or the contents thereof, shall be "subsequent" described below, provided however, no notification shall be required where there is no threat of any described below, provided however, no notification shall be required where there is no threat of any described below, spill.

(7) <u>INTEDIATE FOTIFICATION</u>. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oll and Gas inspector, or the Deputy Oll and Gas inspector. A complete written report ("Subsequent Notification") of the incident shall also be submitted in DUFLICATE to the appropriate district office of the Division within ten cases after discovery of the incident.

(8) <u>SUBSEQUENT ROTIFICATION</u>. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

(9) <u>CONTENT OF NOTIFICATION</u>. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the searest town or prominent landwark so that the exect site of the incident can be readily located on the ground. The report shall specify the neuron and exact so the location of the location, township, and so the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the exactures that have been taken and are being taken to remedy the altertion responsed.

(10) <u>HITERCORSE</u>, for the purpose of this rule, is defined as any lake-bod or gully, draw, stream bed, when, stroyo, or netural or man-made cheven throws which water flows or has flowed. Title:NM - Environment Department • Environmental Improvement Board • Water Quality Control Commission • Groundwater Protection and Remediation Bureau • WQCC 82-1 • Part I • 1-200 • 1-203 Section: 1-203 Notification of Discharge -- Removal Date: November 18, 1993 Subject

1-203. Notification of Discharge -- Removal.

Terms:

A. With respect to any discharge from any facility of oil or water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required;

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief, Ground Water Bureau, Environmental Improvement Division, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the facility;

c. the date, time, location, and duration of the discharge;

d. the source and cause of discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of discharge; and

g. any actions taken to mitigate immediate from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same division official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge

notification and reporting requirements need not additionally comply with the notification and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

6. If it is possible to do so without unduly delaying needed corrective action, the facility owner/operator shall endeavor to contact and consult with the Chief, Ground Water Bureau, Environmental Improvement Division or appropriate counterpart in a delegated agency, in an effort to determine the division's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days.

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the division. In the event that the report is not satisfactory to the division, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the division.

8. In the event that the modified corrective action report also is unsatisfactory to the division, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the division director. The division director shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the director concerning the shortcomings of the modified corrective action report, the division may take whatever enforcement or legal action it deems necessary or appropriate.

B. Exempt from the requirements of this section are continuous or periodic discharges which are made:

1. in conformance with water quality control commission regulations and rules, regulations or orders of other state or federal agencies; or

2. in violation of water quality control commission regulations but pursuant to an assurance of discontinuance or schedule of compliance approved by the Commission or one of its duly authorized constituent agencies.

C. As used in this section:

1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water;

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;

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Date: November 18, 1993 Subject Terms:

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes.

4. "operator" means the person or persons responsible for the overall operation of a facility; and

5. "owner" means the person or persons who own a facility, or part of a facility.

D. Notification of discharge received pursuant to this regulation or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement.