GW - 315

PERMITS, RENEWALS, & MODS Application

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, October 28, 2009 10:36 AM
To: 'Dailey, Aaron '; 'Bays, David'
Cc: VonGonten, Glenn, EMNRD; Perrin, Charlie, EMNRD; Powell, Brandon, EMNRD
Subject: GW-315 Honolulu CS, Admin. Complete
Attachments: GW-315, Admin Complete Letter.pdf; GW-315 Draft Permit Cover.pdf; GW-315 Draft Permit.pdf; GW-315, OCD PN.pdf

Mr. Dailey,

The OCD has determined your discharge plan application to be **administratively complete**.

Attached are documents pertaining to this.

OCD has approved your public notice for publishing. Please publish and submit the proof of publication to OCD once received.

If you have any questions please do not hesitate to call me.

Thank you for your attention.

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 28, 2009

Dear Mr. Dailey:

Re: Discharge Plan Renewal Permit GW-315
Williams Four Corners
Honolulu Compressor Station
Rio Arriba County, New Mexico

The New Mexico Oil Conservation Division (NMOCD) has received Williams Four Corners LLC's request and initial fee, dated August 25, 2009, to renew GW-315 for their Honolulu Compressor Station located in the NW/4 of Section 12, Township 26 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

The New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC has been satisfied and demonstrated to the NMOCD. Please provide a proof of publication affidavit once published. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Leonard Lowe
Environmental Engineer

LRL/lrl

xc: OCD District III Office, Aztec

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 28, 2009

Mr. Aaron Dailey
Williams Four Corners, LLC
188 CR 4900
Bloomfield NM 87413

Re: **DRAFT** Discharge Permit Renewal GW-315 Honolulu Compressor Station
NW/4 of Section 12, Township 26 North, Range 5 West, NMPM
Rio Arriba County, New Mexico

Dear Mr. Dailey:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Williams Four Corners, LLC, (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed Attachment to the Discharge Permit. 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 including permit fees.

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. 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,

Glenn von Gonten
Acting Environmental Bureau Chief

DISCHARGE PERMIT GW-315

1. GENERAL PROVISIONS.

A. PERMITTEE AND PERMITTED FACILITY: The Oil Conservation Division (OCD) of the Energy, Minerals and Natural Resources Department issues discharge permit GW-315 (Discharge Permit) to Williams Four Corners (Owner/Operator), located 188 CR 4900, Bloomfield NM 87413, to operate Honolulu Gas Compressor Station located in the NW/4 of Section 12, Township 26 North, Range 5 West, NMPM, Rio Arriba County (Facility).

The facility provides metering and compression to various producers for the gathering of natural gas. The facility operates at 775 horsepower. Approximately 600-8000 bbl/yr of condensate, 100-5000 gal/year/engine of waste water and 500 – 20000 gal/year/engine of used oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 385 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/L

B. SCOPE OF PERMIT: OCD regulates the disposition of nondomestic wastes resulting from the oil field service industry to protect the public health and the environment pursuant to authority granted in the Oil and Gas Act (Chapter 70, Article 2 NMSA 1978) at NMSA 1978, Section 70-2-12(B)(22). OCD has been granted authority to administer the Water Quality Act (Chapter 74, Article 6 NMSA 1978) as it applies to the oil and field service industry by statute, NMSA 1978, Section 70-2-12(B)(22), and by delegation from the Water Quality Control Commission pursuant to NMSA 1978, Section 74-6-4(E).

The Water Quality Act and the rules issued under that Act protect ground water and surface water of the State of New Mexico by providing that, unless otherwise allowed by rule, no person shall cause or allow effluent or leachate to discharge so that it may move directly or indirectly into ground water unless such discharge is pursuant to an approved discharge plan. See 20.6.2.3104 NMAC and 20.6.2.3106 NMAC. A facility having no intentional liquid discharges is still required to have a discharge plan. Inadvertent discharges of liquids (*e.g.,* leaks and spills, or any type of accidental discharge of contaminants) or improper disposal of waste solids still have a potential to cause ground water contamination or threaten public health and the environment.

Because the Owner/Operator did not identify any intentional discharge that will occur at the Facility, this Discharge Permit does not authorize any discharge. This Discharge Permit addresses the protection of public health and the environment, and the prevention of water pollution, by preventing and mitigating unintentional discharges.

This Discharge Permit does not convey any property rights of any sort or any exclusive privilege, and does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of state, federal or local laws, rules or regulations.

C. DISCHARGE PERMIT CONDITIONS: By agreeing to this Discharge Permit, the Owner/Operator agrees to the specific provisions set out in this document, and the commitments made in the approved Discharge Plan Application and the attachments to that application, which are incorporated into the Discharge Permit by reference. Subsequent modifications of this Discharge Permit pursuant to the Water Quality Act, and subsequent approvals granted by OCD under this Discharge Permit are incorporated into the Discharge Permit, and the Owner/Operator agrees to the provisions in those subsequent modifications and approvals.

If this Discharge Permit is a permit renewal, it replaces the permit being renewed. Replacement of a prior permit does not relieve the Owner/Operator of its responsibility to comply with the terms of that prior permit while that permit was in effect.

D. DEFINITIONS: Terms not specifically defined in this Discharge Permit shall have the same meanings as those in the Water Quality Act, the Oil and Gas Act or the rules adopted pursuant to those Acts, as the context requires.

E. GENERAL PERFORMANCE STANDARDS: The Owner/Operator shall operate in accordance with the Discharge Permit conditions to comply with the Water Quality Act and the Oil and Gas Act and the rules issued pursuant to those Acts, so that neither a hazard to public health nor undue risk to property will result (see 20.6.2.3109.C NMAC); so that no discharge will cause or may cause any stream standard to be violated (see 20.6.2.3109.H(2) NMAC); so that no discharge of any water contaminant will result in a hazard to public health, (see 20.6.2.3109.H(3) NMAC); so that the numerical standards specified of 20.6.2.3103 NMAC are not exceeded; to protect public health and the environment (see NMSA 1978, Section 70-2-12(B)(22)); and to prevent waste of oil and gas, prevent the contamination of fresh waters and so that oil and gas are not used wastefully or allowed to leak or escape from a natural reservoir or from wells, tanks, containers, pipe or other storage conduit or operating equipment. See 19.15.2.8 NMAC.

The Owner/Operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards specified at 20.6.2.3101 NMAC and 20.6.2.3103 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams).

F. FILING FEES AND PERMIT FEES: Pursuant to 20.6.2.3114 NMAC, every facility that submits a discharge permit application for initial approval or renewal shall pay the permit fees specified in Table 1 and the filing fee specified in Table 2 of 20.6.2.3114 NMAC. The OCD has already received the required $100.00 filing fee for this application. The flat fee for a compressor station operating less than 1001 HP is $400.00. The Owner/Operator shall submit this amount along with the signed Discharge Permit. Checks should be made out to the **"New Mexico Water Quality Management Fund,"** not the Oil Conservation Division.

G. EFFECTIVE DATE, EXPIRATION, RENEWAL CONDITIONS, AND PENALTIES FOR OPERATING WITHOUT A DISCHARGE PERMIT: This Discharge Permit is effective when the OCD receives the signed Discharge Permit from the

Owner/Operator, and the $400.00 fee. This Discharge Permit will expire on **January 30, 2015.** The Owner/Operator shall submit an application for renewal no later than 120 calendar days before that expiration date, pursuant to 20.6.2.3106.F NMAC. If an Owner/Operator submits a renewal application at least 120 calendar days before the Discharge Permit expires and is in compliance with the approved Discharge Permit, then the existing Discharge Permit will not expire until OCD has approved or disapproved the renewal application. Operating with an expired Discharge Permit may subject the Owner/Operator to civil and/or criminal penalties. See NMSA 1978, Section 74-6-10.1 and NMSA 1978, Section 74-6-10.2.

H. MODIFICATIONS: The Owner/Operator shall notify OCD of any facility expansion, production increase, or process modification that would result in any significant modification in the discharge of water contaminants. See 20.6.2.3107.C NMAC. OCD may require the Owner/Operator to submit a permit modification pursuant to 20.6.2.3109.E NMAC, and the OCD may modify or terminate a permit pursuant to NMSA 1978, Section 74-6-5(M) through (N).

I. TRANSFER OF DISCHARGE PERMIT: Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of the Facility, the transferor shall notify the transferee in writing of the existence of the Discharge Permit, and shall deliver or send by certified mail to OCD a copy of such written notification, together with a certification or other proof that such notification has been received by the transferee pursuant to 20.6.2.3111 NMAC. Upon receipt of such notification, the transferee shall inquire into all of the provisions and requirements contained in the Discharge Permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in OCD's file or files concerning the Discharge Permit. Upon assuming either ownership or possession of the Facility the transferee shall have the same rights and responsibilities under the Discharge Permit as were applicable to the transferor. See 20.6.2.3111 NMAC.

The transferee (new owner/operator) shall provide the OCD with a signed original of the Discharge Permit.

Transfer of the ownership, control, or possession of the Facility does not relieve the transferor of responsibility or liability for any act or omission which occurred while the transferor owned, controlled or was in possession of the Facility. See 20.6.2.311.E NMAC.

J. CLOSURE PLAN AND FINANCIAL ASSURANCE: The Owner/Operator shall notify OCD in writing when any operations of the Facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this Discharge Permit, or upon request from OCD, the Owner/Operator shall submit a closure plan, modified closure plan, and/or provide adequate financial assurance. See 20.6.2.3107 NMAC.

K. COMPLIANCE AND ENFORCEMENT: If the Owner/Operator violates or is violating a condition of this Discharge Permit, the OCD may issue a compliance order requiring compliance immediately or within a specified time period, suspending or terminating this Discharge Permit, and/or assessing a civil penalty. See NMSA 1978, Section 74-6-10. OCD may

also commence a civil action in district court for appropriate relief, including injunctive relief. See NMSA 1978, Section 74-6-10(A)(2); NMSA 1978, Section 74-6-11. The Owner/Operator may be subject to criminal penalties for discharging a water contaminant without a discharge permit or in violation of a condition of a discharge permit; making any false material statement, representation, certification or omission of material fact in an application, record, report, plan or other document filed, submitted or required to be maintained under the Water Quality Act; falsifying, tampering with or rendering inaccurate any monitoring device, method or record required to be maintained under the Water Quality Act; or failing to monitor, sample or report as required by a permit issued pursuant to a state or federal law or regulation. See NMSA 1978, Section 74-6-10.2.

2. GENERAL FACILITY OPERATIONS

A. LABELING: The Owner/Operator shall clearly label all tanks, drums, and containers to identify the contents and provide other emergency notification information. The Owner/Operator may use a tank code numbering system, if that tank code numbering system is incorporated into its approved Contingency Plan.

B. INSPECTIONS AND MAINTENANCE OF SECONDARY CONTAINMENT SYSTEMS: The Owner/Operator shall inspect all secondary containment systems and sumps designed for spill collection/prevention and leak detection at least weekly to ensure proper operation and to prevent over topping or system failure. The Owner/Operator shall record the results of its inspection in a log book.

The Owner/Operator shall empty all spill collection and/or secondary containment devices of fluids within 72 hours of discovery. The Owner/Operator shall report any leak or failure of a secondary containment system to OCD as a release, in accordance with Permit Condition 2.E. The Owner/Operator shall repair any leak or failure of a secondary containment system as provided in its approved Contingency Plan or as required by OCD.

C. RECORD KEEPING: The Owner/Operator shall maintain at the Facility records of all inspections required by this Discharge Permit for a minimum of five years and shall make those records available for OCD inspection.

D. TESTING: The Owner/Operator shall provide OCD with notice one week prior to conducting any test required under this Discharge Permit, so that OCD may witness the test. The Owner/Operator shall maintain at the Facility records of all tests conducted pursuant to this Discharge Permit and the results of those tests, and make those records available for OCD inspection. The Owner/Operator shall give verbal notice of a test failure to OCD within 24 hours, and file a written report of the failure with the OCD within 15 days. The Owner/Operator shall complete repairs to correct the failure as provided in its approved Contingency Plan or as required by OCD.

E. RELEASE REPORTING: The Owner/Operator shall report unauthorized releases of water contaminants pursuant to 19.15.29 NMAC and any additional commitments made in the approved Contingency Plan. For purposes of this Discharge Permit, "releases" includes breaks,

leaks, spills and other failures of a primary or secondary containment system, and the movement of storm water from a "contact area" to a "non-contact area." At a minimum, the Owner/Operator shall file a written report of the release with both the OCD District Office and the OCD Santa Fe Office within 15 days for both "major releases" and "minor releases" as defined in 19.15.29.7 NMAC, and give verbal notice to both the OCD District Office and the OCD Santa Fe Office within 24 hours of discovering a "major release."

F. CORRECTIVE ACTION FOR RELEASES: The Owner/Operator shall take appropriate corrective action as specified in its approved Contingency Plan for all releases of contaminants whether or not the release qualifies as a "major" or "minor" release as defined in 19.15.29.7 NMAC.

The Owner/Operator shall address any contamination through the discharge permit process or pursuant to 20.6.2.4000 NMAC through 20.6.2.4116 NMAC (Prevention and Abatement of Water Pollution). OCD may require the Owner/Operator to modify its Discharge Permit to provide for investigation, remediation, abatement, and monitoring for any vadose zone or water pollution.

G. ANNUAL REPORT: The Owner/Operator shall submit an annual report to OCD by March 15 of each year. The annual report shall include the following:

1. For each waste stream, the amount of effluent and waste solids generated and stored in the prior calendar year;
2. The amount of and final disposition of each waste stream;
3. A copy of all inspections conducted of secondary containment systems; and
4. The nature and amount of any releases, with a description of the disposition of any contaminated soil or water.

3. MATERIAL STORAGE:

A. DRUM AND CONTAINER STORAGE: The Owner/Operator shall store all drums and other containers, including empty drums and containers, on a curbed, impermeable pad. "Containers" include tote tanks, sacks, and buckets. The Owner/Operator shall store empty drums on their sides with the bungs in place and lined up on a horizontal plane. These requirements do not apply to drums and containers that contain only fresh water and are clearly so labeled.

B. PROCESS, MAINTENANCE, MATERIAL, AND WASTE STORAGE AREAS: The Owner/Operator shall pave and curb all process, maintenance, material and waste storage areas at its facility, or incorporate another appropriate spill collection device for the areas. (See 20.6.2.1203C(2) NMAC).

C. ABOVE GROUND TANKS: The Owner/Operator shall place above ground tanks on impermeable pads and surround the tanks with lined berms or other impermeable secondary containment system having a capacity at least equal to one and one-third times the capacity of the largest tank, or, if the tanks are interconnected, of all interconnected tanks. The

Owner/Operator is not required to provide secondary containment for any tanks that contain fresh water, and that are clearly so labeled.

The Owner/Operator shall retrofit existing above ground tanks that do not meet the requirements described above. The Owner/Operator shall submit a plan for the retrofitting to the OCD no later than the date for submitting an application for renewal of this Permit. The OCD will review and approve, approve with conditions, or deny the Owner/Operator's plan. The approved plan for retrofitting existing above ground tanks shall be incorporated into any permit renewal.

4. WASTE MANAGEMENT.

A. WASTE STREAMS: This Discharge Permit authorizes the Owner/Operator to handle the waste streams identified in its approved Discharge Plan Application. **Owner/Operator must obtain OCD approval for disposal of any waste stream not identified in its approved Discharge Plan Application.**

B. WASTE STORAGE: The Owner/Operator shall store waste at its Facility only in clearly marked waste storage areas that have been identified in its approved Discharge Plan Application, except that waste generated during emergency response operations may be stored elsewhere for no more than 72 hours. OCD may approve additional waste storage areas on a case-by-case basis. The Owner/Operator shall not store oil field waste (see 19.15.2 NMAC) on site for more than 180 calendar days without obtaining approval from OCD.

C. WASTE DISPOSAL: This Discharge Permit does not authorize on site disposal of nondomestic wastes.

The Owner/Operator shall dispose of the waste streams identified in its approved Discharge Plan Application at OCD permitted or approved facilities in accordance with the applicable rules for disposal at those facilities. The Owner/Operator is approved for the simplified procedure set out in 19.15.35.8.B(4) NMAC for disposal of wastes specified in 19.15.35.8.C(2) and (3) NMAC at solid waste facilities without OCD's prior written authorization provided that the waste stream has been identified in the approved Discharge Plan Application and existing process knowledge of the waste stream does not change.

D. CLASS V WELLS: Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are UIC Class V injection wells, pursuant to 20.6.2.5002.B NMAC.

This Discharge Permit does not authorize the use of a Class V injection well for the disposal of industrial waste at the Facility. The Owner/Operator shall close any Class V industrial waste injection wells at the Facility that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes (*e.g.,* septic systems, leach fields, dry wells, *etc.*) pursuant to 20.6.2.5005 NAMC within 90 calendar days of the issuance of this Discharge Permit. Other Class V wells, including wells used only for the injection of domestic wastes, must be permitted by the New Mexico Environment Department.

5. BELOW-GRADE TANKS, PITS, PONDS, AND SUMPS.

A. EXISTING BELOW-GRADE TANKS, PITS AND PONDS: Below-grade tanks, pits, and ponds must have secondary containment systems with leak detection. The Owner/Operator shall retrofit existing below-grade tanks, pits and ponds that do not have secondary containment and leak detection systems to meet these requirements. The Owner/Operator shall submit a plan for the retrofitting to OCD no later than the date for submitting an application for renewal of this Discharge Permit. OCD shall review and approve, approve with conditions, or deny the Owner/Operator's retrofit plan. The approved plan for retrofitting existing below-grade tanks, pits and ponds shall be incorporated into any permit renewal.

The Owner/Operator must test existing below-grade tanks, pits and ponds without secondary containment and leak detection annually or as specified herein. The Owner/Operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods.

B. EXISTING SUMPS: A sump is any impermeable vessel or collection device incorporated within a secondary containment system, with a capacity less than 500 gallons, which remains predominantly empty, serves as a drain or receptacle for *de minimis* releases on an intermittent basis and is not used to store, treat, dispose of or evaporate products or wastes. The Owner/Operator shall empty all sumps of all materials at least once a week.

C. NEW BELOW-GRADE TANKS, PITS, PONDS AND SUMPS: The Owner/Operator shall obtain OCD's approval before installing a new below-grade tank, pit, pond or sump. The Owner/Operator should submit a proposed design plan to OCD to install a new below-grade tank, pit, pond or sump at least 90 calendar days before it intends to install the new unit. Design plans for below-grade tanks, pits, and ponds shall incorporate secondary containment and leak detection. Proposed design plans for pits and ponds shall include hydrologic and geologic reports, siting information, monitoring and closure plans and information on foundation and liners. OCD will review and approve, approve with conditions, or deny the Owner/Operator's proposed design for a new below-grade tank, pit, pond or sump.

D. FENCING: The Owner/Operator shall fence all below-grade tanks, pits and ponds pursuant to 19.15.17.11.D NMAC.

E. SCREENING AND NETTING: The Owner/Operator shall screen or net all open top tanks that are eight feet in diameter or larger and all pits (including lined pits), or otherwise render the tanks and pits non-hazardous to wildlife, including migratory birds, pursuant to 19.15.17.11.E NMAC.

6. UNDERGROUND PROCESS AND WASTEWATER PIPELINES.

A. TESTING: The Owner/Operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water. The Owner/Operator shall test all pressure-rated pipe to 150% of the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The Owner/Operator may propose other test methods for OCD's review and approval.

B. SCHEMATIC DIAGRAMS OR PLANS: The Owner/Operator shall maintain at its Facility all underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location.

C. NEW UNDERGROUND PIPING: The Owner/Operator must notify OCD prior to installing any new underground piping. The Owner/Operator should submit a design plan to the OCD for new underground piping at least 90 calendar days before it intends to begin construction. The OCD shall determine whether any modifications to this Discharge Permit are necessary and appropriate based on the new underground piping.

7. STORM WATER: The Owner/Operator shall implement and maintain storm water run-on and run-off plans and controls to separate chemical process areas and flow lines (contact areas) from storm water areas (non-contact areas), and shall comply with any additional commitments made in its approved Contingency Plan. The movement of storm water from a contact area to a non-contact area is a release, and the Owner/Operator shall report that release and take corrective action.

8. ADDITIONAL SITE SPECIFIC CONDITIONS: N/A

9. CERTIFICATION: (OWNER/OPERATOR) by the officer whose signature appears below, acknowledges receipt of this Discharge Permit, and has reviewed its terms and conditions.

_____
Company Name - print name above

_____
Company Representative - print name

_____
Company Representative - Signature

Title_____

Date:_____

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 (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-315) Mr. Aaron Daily, Environmental Specialist, Williams Four Corners, 188 CR 4900, Bloomfield NM, has submitted a renewal application for the previously approved discharge plan for their Honolulu compressor station, located in the NW/4 of Section 12, Township 26 North, Range 5 West, NMPM, Rio Arriba County. The facility provides metering and compression to various producers for the gathering of natural gas. The facility operates at 775 horsepower. Approximately 600-8000 bbl/yr of condensate, 100-5000 gal/year/engine of waste water and 500 – 20000 gal/year/engine of used oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 385 feet, with a total dissolved solids concentration of approximately 200 - 2000 mg/L. The discharge plan 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 NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this **28th** day of October 2009.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 8/24/09

or cash received on _____ in the amount of $ 100.00

from Williams Four Corners LLC

for GW-315

Submitted by: Lawrence Correio Date: 9/1/09

Submitted to ASD by: _____ Date: 9/1/09

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

Deklau, Ingrid

From: Deklau, Ingrid
Sent: Tuesday, August 25, 2009 8:49 AM
To: Lowe, Leonard, EMNRD
Cc: Dailey, Aaron ; Deklau, Ingrid
Subject: Williams Honolulu Compressor Station - OCD Renewal application - Submittal
Attachments: Honolulu-Water-Plan-OCD Plan GW-315 Renewal 2009-09.pdf

Leonard –
Attached, please find Williams Four Corners, LLC's OCD Discharge Plan renewal application for the Honolulu Compressor Station (GW-315).
A check for $100 filing fee has been mailed to you under separate cover.
Please let me know if you also need the certification page with original signature, and please call if you have any questions.
Thanks,
Ingrid
801-583-3107

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Compressor Station (Honolulu Compressor Station, GW-315)

2. Operator: Williams Four Corners, LLC

Address: 188 CR 4900, Bloomfield, NM 87413

Contact Person: Aaron Dailey Phone: 505-632-4708

3. Location: NW/4 Section 12 Township 26 North Range 5 West
Submit large scale topographic map showing exact location.

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

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

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

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

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

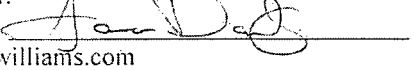
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.

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

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

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

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

14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
Name: Aaron Dailey; Signature: 
E-mail Address: aaron.dailey@williams.com

Title: Environmental Specialist
Date: 8/25/2009

Honolulu Compressor Station

NMOCD Discharge Plan
GW-315 Renewal

Williams Four Corners, LLC
188 CR 4900
Bloomfield, NM 87413

September 2009

Item 1
Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant (CO_2 removal) and compressor station include the total combined site rated horsepower.

The Honolulu Compressor Station is owned and operated by Williams Four Corners, LLC (Williams). The station was constructed in 1999 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams system. The site has been permitted to allow operation of one (1) 775 hp engine, which is currently operating at the site. Compressors and dehydrators may be installed or removed to meet demand. In addition, there are various storage tanks, support structures and ancillary equipment.

Item 2
Name of operator or legally responsible party and local representative.

Legally Responsible Party/ Operator	Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 632-4600/4634 (800)-645-7400 (24 hour emergency notification)
Local Representative	Aaron Dailey Williams Four Corners, LLC 188 County Road 4900 Bloomfield, NM 87413 (505) 632-4708

Item 3
Give a legal description of the location and county. Attach a large-scale topographic map.

Rio Arriba County, New Mexico
Township 26 North, Range 5 West, NW/4 Section 12
The topographic map is attached as Figure 1.

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

Williams Field Services is leasing the subject property from:

Bureau of Indian Affairs
Jicarilla Apache Indian Agency
PO box 167
Dulce, New Mexico 87528
505-759-3976

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

The facility plot plan has been updated and is included with this document as Figure 2. The modifications to the drawing include the addition of a 500 gallon antifreeze tank and a 325 gallon glycol tank.

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

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

MSDSs for materials at the site will be maintained in Williams' corporate office and will be available upon request.

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

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

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

There have been no modifications except that used oil filters and oil soaked pads and socks will be recycled per OCD regulations. This is reflected in Table 1, which describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site. See additional information on-file at OCD.

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

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

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

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

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

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

Item 12

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

A current well search was performed using the New Mexico Office of the State Engineer's WATERS Database(1) for this renewal application. There is no new information to report for this item. Information on the water well located within a 1-mile radius of the Honolulu Compressor Station is presented in the table below. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 200-2,000 mg/l.

Township; Range; Section	Quarter[a]	Apx. Distance from Site (mi)	Well #	Use[b]	Well Depth (ft)	Water Bearing Stratification (ft)	Description	Depth to Water (ft)
26N; 5W; 2	4	<1	unk	unk	500	304-355 420-500	San Jose formation	385

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

Note b: dom = domestic; unk=unknown

References

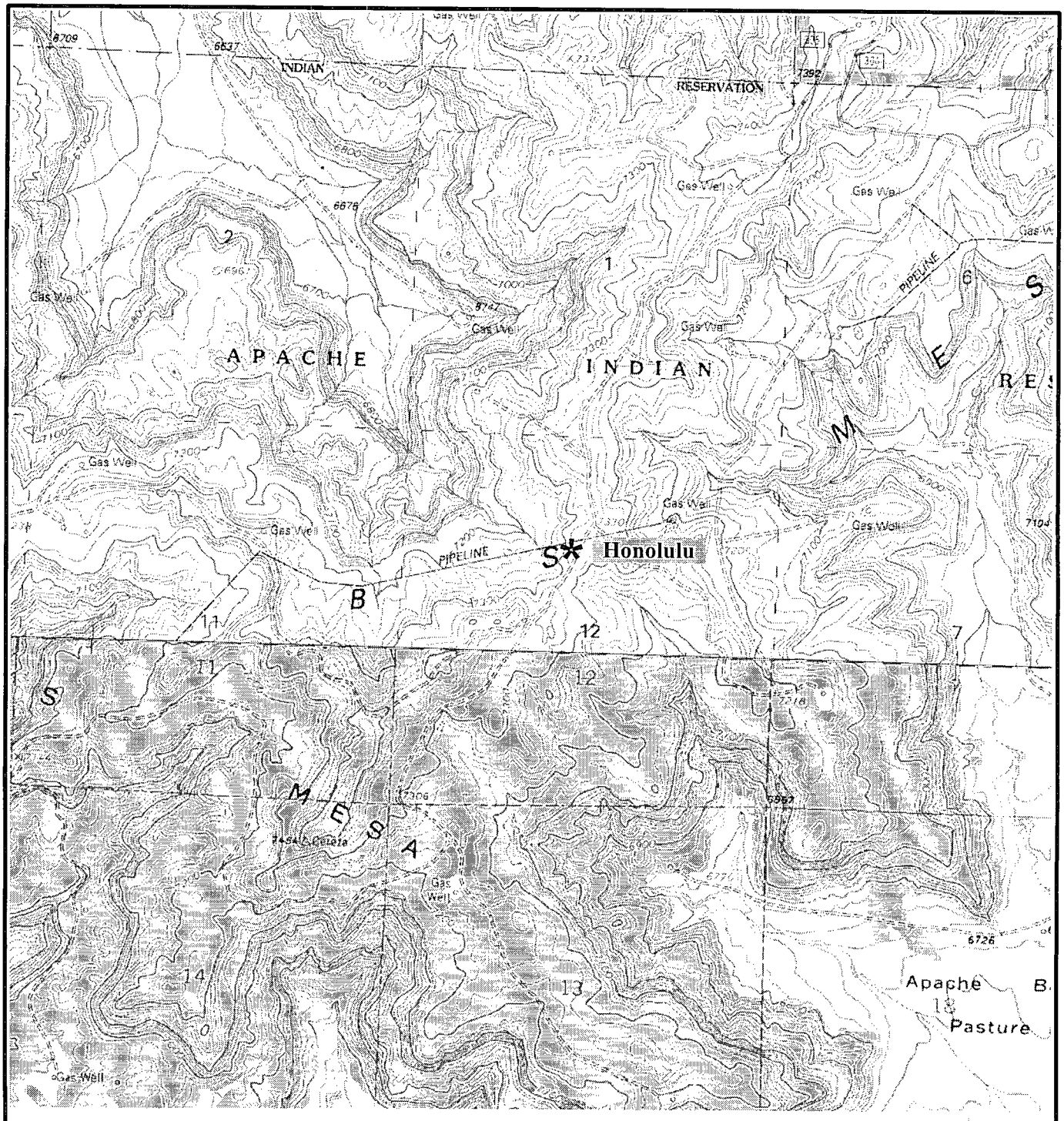
[1]Online Well Reports and Downloads, New Mexico Office of the State Engineer, search performed 8/21/2009.

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

Item 13

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

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



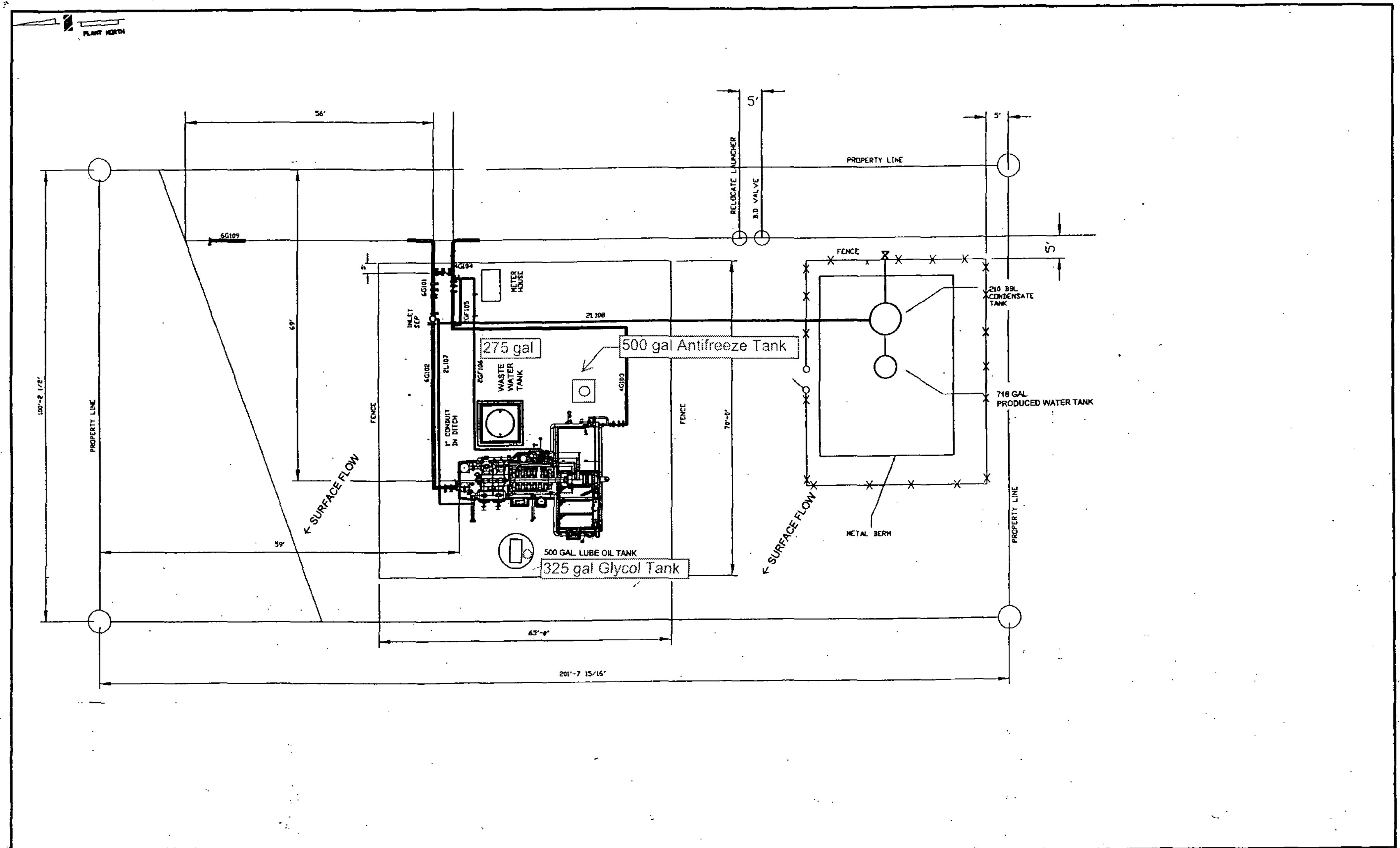
Source: USGS Vigas Canyon and Lapis Point, NM Quadrangles

Figure 1 Site Vicinity / Topographic Map

Honolulu Compressor Station

Section 12, Township 26N Range 5W

Rio Arriba County, New Mexico



LEGEND	REFERENCE DRAWINGS	REVISIONS	DRAFTING / BY / DATE	ENGINEERING / BY / DATE

WILLIAMS FIELD SERVICES

TORRE ALTA GATHERING SYSTEM
HONOLULU COMPRESSOR PLOT PLAN
SEC. 12, T-26-N, R-5-W NMPM
RIO ARRIBA COUNTY, NEW MEXICO

DWG. NO. HON-1-P1

\Work\HON-P-1.dwg

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	AST, or removed from site at change out	500 gal*	Metal tank	Non-exempt	May be removed from site immediately with change-out or stored in AST. May be hauled to a Williams or contractor consolidation point before transport to EPA-registered used oil marketer for recycling.
Natural Gas Condensate/ Produced Water	AST	718 gal	Lined berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at 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.
Natural Gas Condensate	AST	8820 gal	Lined berm	Exempt	Saleable liquids may be sold to refinery. The remaining liquids may be transported to a Williams' evaporation facility or may be disposed at 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.
Waste Water/ Wash Down Water	AST	275 gal	Lined berm	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 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, Oil Soaked Pads & Socks	Drum or other container	Varies	Transported in drum or other container	Non-exempt	Used oil filters and oil soaked pads and socks will be recycled as required by OCD regulations.
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 or transported to Williams' or contractor facility**	Non - exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Glycol	AST	325 gal	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Antifreeze	AST	500 gal	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.
Lube Oil	AST	500 gal*	Metal tank	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.
AST=Above Ground Storage Tank

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

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Natural Gas Condensate/ Produced Water	Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank	600-8000 bbl/year	May contain trace lube oil and/or glycol
Natural Gas Condensate	Inlet Scrubber, Gas Inlet Separator, Dehydrators, Condensate Tank	500-8000 bbl/year	No Additives
Waste Water/ Wash Down Water	Compressor and Dehy Skids; Process Areas; Condensate Tank	100-5000 gal/year/unit	Biodegradable soap and tap water with traces of used oil
Used Glycol/Antifreeze/ Methanol	Site and Field Dehydration/ Coolant	0-4000 bbl/yr	No additives
Used Solvent	Parts Cleaner; Pipeline Additive	0-500 gal/year	No additives
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
Used/off-spec materials (eg. glycol, antifreeze, corrosion inhibitor)	Dehydration and compression	0-200 gal/yr/material	No Additives

See attached DRAFT Public Notice, to include the following:

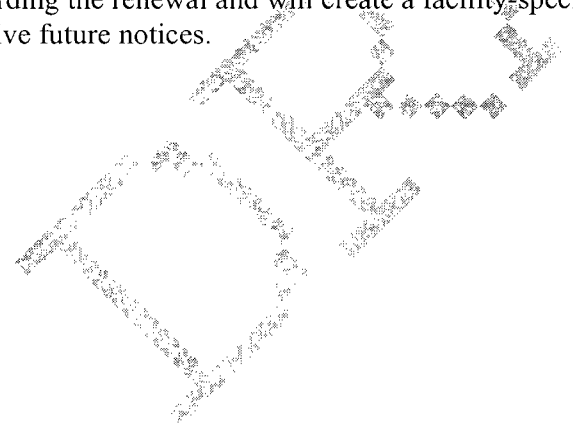
- Newspaper notice published in Farmington Daily Times in English and Spanish
- Landowner notice to BLM

PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in September 2009 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-315 for their Honolulu Compressor Station located in the NW/4 of Section 12 Township 26 North, Range 5 West in Rio Arriba County, New Mexico. The facility, located approximately 42 miles southeast of Bloomfield, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100 – 5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be greater than 300 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.



ATENCIÓN PÚBLICA

Williams Four Corners, LLC, County Road 4900, Bloomfield, NM 87413, han presentado una aplicación de renovación en septiembre de 2009 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para la descarga antes aprobada planean GW-315 para su Honolulu Compressor Station localizada en el NW/4 de la Sección 12, Municipio 26 Norte, Recorren 5 Oeste en Rio Arriba County, New Mexico. La instalación, sudeste de aproximadamente 42 millas localizado de Bloomfield, proporciona servicios de acondicionamiento y compresión de gas naturales.

El plan de descarga se dirige como las caídas, los agujeros, y otras descargas casuales a la superficie serán manejados. Los materiales típicos generados o usados en la instalación incluyen el echar agua condensado/producir de gas natural, el petróleo de lubricación nuevo y usado, echar agua de desecho aceitoso del equipo se lavan abajo, y glicol. La cantidad de wastewater generado es 100 – 5000 galones por año por motor. La instalación no descarga para revestir o subrevestir los echares agua. Toda la basura generada será temporalmente almacenada en tanques o contenedores equipados con la contención secundaria. La basura transportó offsite será dispuesto o reciclado en una instalación permitida por la agencia estatal, federal, o tribal recibir tal basura. Se espera que la profundidad de agua subterránea estimada en el sitio esté en la variedad de 300 pies. El total se disolvió se espera que la concentración de sólidos del agua subterránea de área esté en la variedad de 200-2,000 partes por millón.

Cualquier persona interesada o personas pueden obtener la información, presentar comentarios o solicitar para ser colocado en una lista de direcciones específica de instalación para futuros avisos por ponerse en contacto con Leonard Lowe en el Nuevo México OCD en 1220 Sur San. Francis Drive, Santa Fe, Nuevo México 87505, Teléfono (505) 476-3492. El OCD aceptará comentarios y declaraciones del interés en cuanto a la renovación y creará una lista de direcciones específica de instalación para personas que desean recibir futuros avisos.

Four Corners Area
Environmental Department
#188 County Road 4900
Bloomfield, N.M. 87413
Phone: (505) 632-4708
Fax: (505) 632-4781

September 1, 2009

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Bureau of Iindian Affairs
Jicarilla Apache Indian Agency
PO box 167
Dulce, New Mexico 87528

Dear Madam/Sir:

This letter is to advise you that Williams Four Corners, LLC submitted a Discharge Plan Renewal application to the Oil Conservation Division for the permitted Honolulu Compressor Station (GW-315) in September 2009. This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations.

The facility, located in the NW/4 Section 12, Township 26 North, Range 5 West, Rio Arriba County, New Mexico, approximately 42 miles southeast of Bloomfield, provides natural gas compression and conditioning services.

The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Typical materials generated or used at the facility include natural gas condensate/produced water, new and used lube oil, oily waste water from equipment wash down, and glycol. The quantity of wastewater generated is 100–5000 gallons per year per engine. The facility does not discharge to surface or subsurface waters, and therefore the quantity and quality of the discharges is not applicable. All wastes generated will be temporarily stored in tanks or containers equipped with secondary containment. Waste shipped offsite will be disposed or recycled at a facility permitted by state, federal, or tribal agency to receive such waste. The estimated ground water depth at the site is expected to be greater than 300 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

Leonard Lowe
New Mexico Oil Conservation Division
1220 South Saint Francis Dr.
Santa Fe NM 87505
505-476-3492

Respectfully submitted,

Aaron Dailey
Environmental Specialist

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-315
WILLIAMS FIELD SERVICES
HONOLULU COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(December 13, 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 Commitments: Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated May 26, 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 plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans 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: BP America Production 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 BP America Production Company shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. BP America Production 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 HONOLULU Compressor Station are discontinued for a period in excess of six months. Prior to closure of the HONOLULU Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

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

Accepted:

WILLIAMS FIELD SERVICES

by David Bays

SR. ENV. SPECIALIST

Title

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

December 13, 2005

Mr. David Bays
Williams Field Services
188 CR 4900
Bloomfield, New Mexico 87413

RE: Discharge Permit Renewal GW-315
Williams Field Services
Honolulu Compressor Station
Rio Arriba County, New Mexico

Dear Mr. Bays:

The ground water discharge permit renewal GW-315 for the Williams Field Services Honolulu Compressor Station located in the NW/4 of Section 12, Township 26 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge permit consists of the original discharge permit application as approved January 3, 2000 and the renewal application dated May 26, 2005. 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 discharge permit renewal application was submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to 20 NMAC 3109.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

Please note that 20 NMAC 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 20 NMAC 3107.C., Williams Field Services is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to 20 NMAC 3109.G.4., this renewal plan is for a period of five years. This renewal will expire on **January 3, 2010**, and Williams Field Services should submit an application in ample time before this date. Note that under 20 NMAC 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 plan, 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 .

The discharge permit renewal application for the Williams Field Services Honolulu 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. There is a renewal flat fee assessed for compressor station facilities with horsepower rating over 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 District Office

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-315
WILLIAMS FIELD SERVICES
HONOLULU COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
(December 13, 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 Commitments: Williams Field Services will abide by all commitments submitted in the discharge permit renewal application dated May 26, 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 plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans 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: BP America Production 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 BP America Production Company shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. BP America Production 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 HONOLULU Compressor Station are discontinued for a period in excess of six months. Prior to closure of the HONOLULU Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

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

Accepted:

WILLIAMS FIELD SERVICES

by_____

_____

Title

ATTACHMENT TO THE DISCHARGE PLAN GW-315
WILLIAMS FIELD SERVICES
HONOLULU COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(January 3, 2000)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is no required flat fee for compressor stations which have less than 1000 horsepower.

2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated July 9, 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 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.

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Accepted:

WILLIAMS FIELD SERVICES

by _____ Title Envt'l Spec.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 3, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-741

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

RE: Discharge Plan Approval GW-315
Williams Field Services
Honolulu Compressor Station
Rio Arriba County, New Mexico

Dear Mr. Deklau:

The ground water discharge plan GW-315 for the Williams Field Services Honolulu Compressor Station located in the NW/4 of Section 12, Township 26 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated July 9, 1999 and the attached conditions of approval. 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 discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F, which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve Williams Field Services of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Pursuant to Section 3109.G.4., this plan is for a period of five years. This approval will expire on **January 3, 2005**, and Williams Field Services should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan 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 .

The discharge plan application for the Williams Field Services Honolulu 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 plus a flat fee. No flat fee is required at compressor stations with less than 1000 horsepower. 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 274 520 741 OCD

FORD

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 GW-315	

PS Form 3800, April 1995

ATTACHMENT TO THE DISCHARGE PLAN GW-315
WILLIAMS FIELD SERVICES
HONOLULU COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(January 3, 2000)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is no required flat fee for compressor stations which have less than 1000 horsepower.

2. Williams Field Services Commitments: Williams Field Services will abide by all commitments submitted in the discharge plan application dated July 9, 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 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.

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Accepted:

WILLIAMS FIELD SERVICES

by_____
Title

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

RECEIVED
JUN 17 2005
Per.....

1. Type: Compressor Station (Honolulu Compressor Station, GW-315)
2. Operator: Williams Field Services Company

   Address: 188 CR 4900, Bloomfield, NM 87413

   Contact Person: David Bays Phone: 505-634-4951
3. Location: Section 12 Township 26 North Range 5 West
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: David Bays Title: Sr. Environmental Specialist

Signature: David Bays Date: May 26, 2005

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

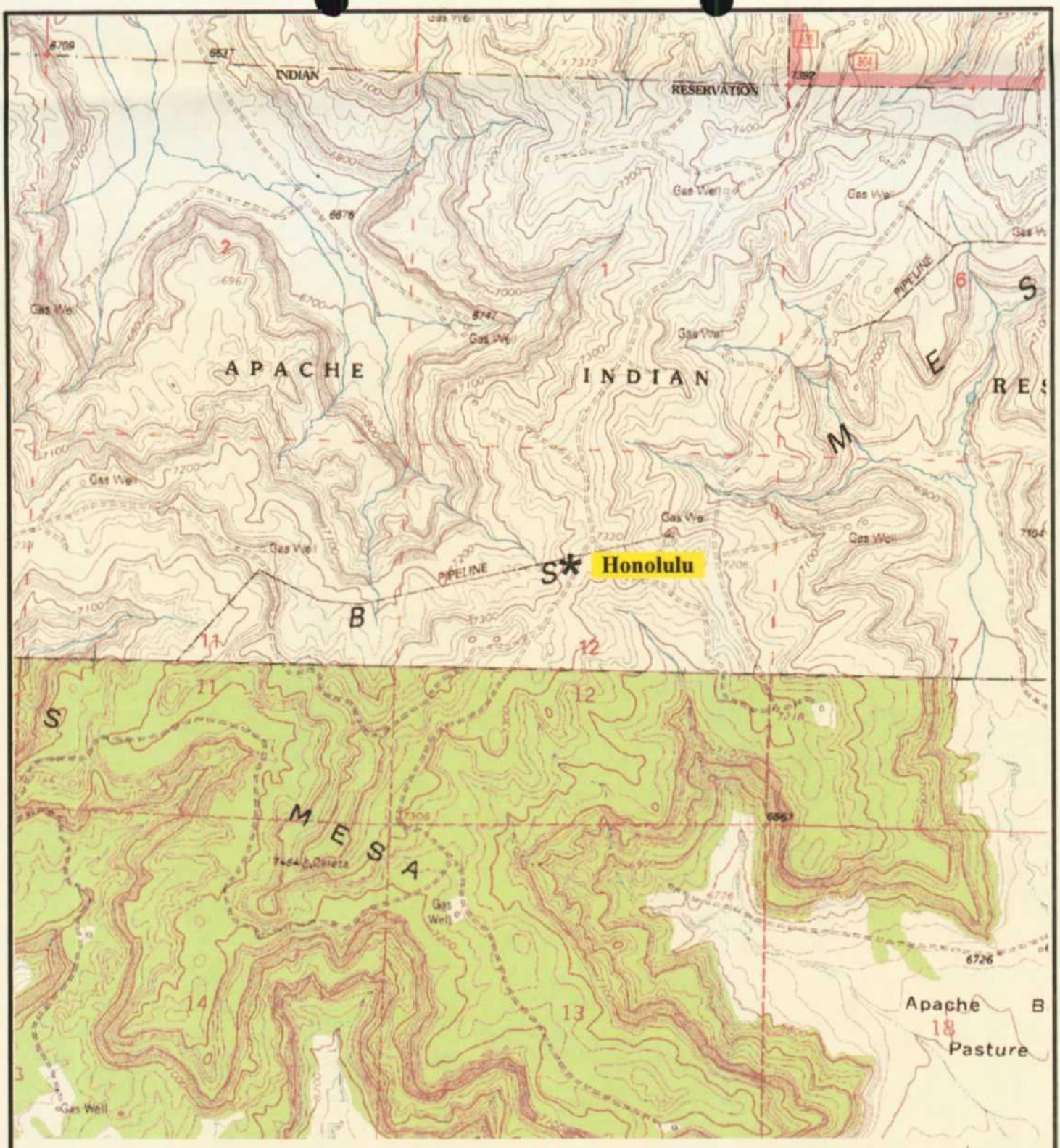

Figure 1 Site Vicinity / Topographic Map

Honolulu Compressor Station

Section 12, Township 26N Range 5W

Rio Arriba County, New Mexico

Honolulu
Compressor Station

NMOCD
Discharge Plan
GW-315

Williams Field Services
188 CR 4900
Bloomfield, NM 87413

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1.0 TYPE OF OPERATION

The Honolulu Compressor Station was constructed in 1999 to provide metering and compression services to various producers for the gathering of natural gas for treatment and delivery through the Williams Field Services (WFS) system.

2.0 LEGALLY RESPONSIBLE PARTY

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

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

3.0 LOCATION OF FACILITY

The facility is located in NW/4 Section 12, Township 26 North, Range 5 West, in Rio Arriba County, New Mexico, approximately 22 miles north-northeast of Counselor, New Mexico. The facility latitude and longitude are North 36° 30.255,36' and West 107° 18.626,70'. A site location map is attached (USGS 7.5 Min. Quadrangles: Vigas Canyon and Lapis Point, New Mexico) as Figure 1.

4.0 LANDOWNER

Williams Field Services is leasing the subject property from:

Bureau of Iindian Affairs
Jicarilla Apache Indian Agency
PO box 167
Dulce, New Mexico 87528
505-759-3976

5.0 FACILITY DESCRIPTION

This facility is a field compressor station and is un-manned. The site has been permitted to allow operation of one (1) 775 hp engine, which is currently operating at the site. The facility layout is illustrated in Figure 2.

6.0 SOURCE, QUANTITY AND QUALITY OF EFFLUENTS AND WASTE SOLIDS

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

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

Wastes generated at this facility fall into two categories: exempt and non-exempt. Exempt wastes include, but may not be limited to, used process filters, condensate spill cleanups (spill residue), certain absorbents, and produced water with or without de minimus quantities of non-hazardous liquids. Non-exempt wastes include, but may not be limited to, used oil, used oil filters, and engine coolant. Table 2 describes the transfer, storage and disposal of exempt and non-exempt process fluids, effluents, and waste solids expected to be generated at the site.

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

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

8.0 STORM WATER PLAN

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

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

8.1 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.

8.2 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.

9.0 INSPECTION, MAINTENANCE AND REPORTING

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

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

10.0 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

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

Williams corporate policy and procedure for the controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided in Appendix A. Significant spills and leaks are

reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC 1-203 using the NMOCD form (see Appendix B).

11.0 SITE CHARACTERISTICS

The Honolulu Compressor Station is located on BS Mesa at an elevation of approximately 7300 feet. The surrounding area is characterized by high mesas exceeding 7,000 feet in elevation, and is dissected by numerous small canyons and broad valleys. Vegetation in the area consists predominantly of sagebrush and native grasses.

The natural ground surface topography of the Honolulu site slopes downward toward the southeast. The maximum relief over the site is approximately 4 feet. The site is several hundred feed northeast of an intermittent stream that flows northwest into the Cereza Canyon drainage, which is located about 4 miles downgradient at an elevation of approximately 6500 feet.

A review of the available hydrologic data (1,2) for this area revealed that there is only one water well within a radius of 2 miles from the location of the Honolulu Compressor Station. The nearest water well was found within one mile of the site in the southeast quarter of Township 26 North, Range 5 West, Section 2. The data available on this well indicated that the well was drilled to a depth of 500 feet, in the San Jose formation, for Lindberg Velarde. The well is located at 6750 feet above mean seal level and in 1977 the depth to water was measured to be 385 feet. The producing intervals are indicated to be 304-355 feet and 420-500 feet. The ground water in the area is expected to have a total dissolved solids (TDS) concentration of approximately 200-2,000 mg/l.

The 100-year 24-hour precipitation event for the area is 2.8 inches. This small amount of rainfall for the area should pose no flood hazards.

References

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

[2]Online Well Reports and Downloads, New Mexico Office of the State Engineer, 2000.

12.0 FACILITY CLOSURE PLAN

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

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

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

TABLES

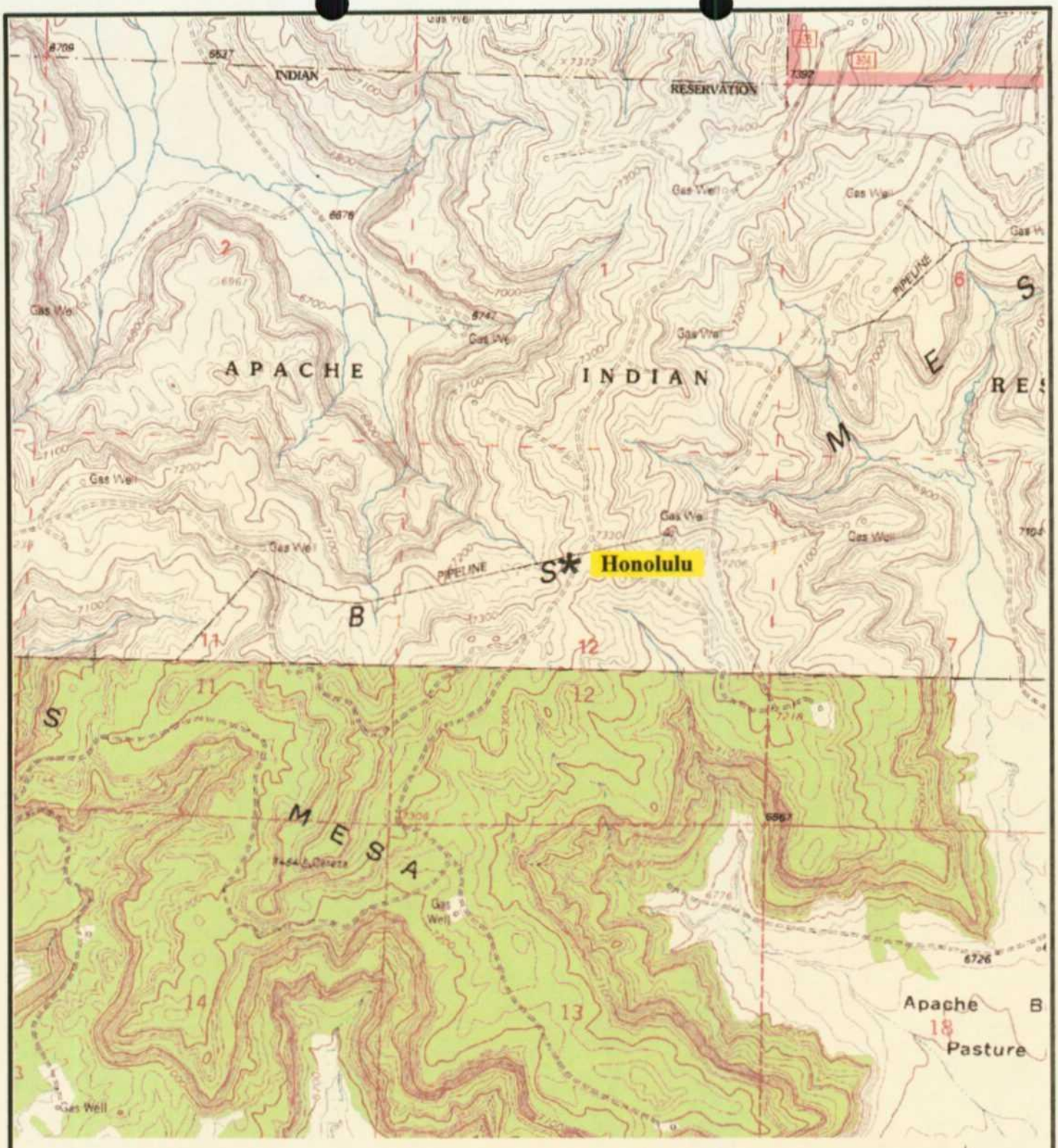
TABLE 1
SOURCE, QUANTITY AND QUALITY OF EFFLUENT AND WASTE SOLIDS
HONOLULU COMPRESSOR STATION

PROCESS FLUID / WASTE	SOURCE	QUANTITY (Ranges)	QUALITY
Used Oil	Compressor	100-500 gallons/year/engine	Used Motor Oil w/ No Additives
Used Oil Filters	Compressor	20-60 gallons/year/engine	No Additives
Condensate	Scrubber	200-800 barrels/year	No Additives
Produced Water	Scrubber	200-500 barrels/year	May contain trace lube oil
Waste Water	Compressor Skid	500-1,500 gallons/year/engine	Biodegradable soap and tap water w/ traces of oil
Used Process Filters	Air	2-10/year	No Additives
Empty Drums/Containers	Liquid Containers	0-20/year	No Additives
Spill Residue (i.e. soil, gravel, etc)	Incident Spill	Incident Dependent	Incident Dependent
Used Adsorbents	Incident Spill/Leak Equipment Wipe-down	Incident Dependent	No Additives

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

PROCESS FLUID/WASTE	STORAGE	STORAGE CAPACITY (approximate)	CONTAINMENT/ SPILL PREVENTION	RCRA STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Above Ground Storage Tank	500 gal tank for each engine	Metal tank	Non-exempt	Transported to a Williams or contactor consolidation point before transport to EPA-registered used oil marketer for recycling.
Used Oil Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Produced Water	Above Ground Storage Tank	718 gal	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Condensate	Above Ground Storage Tank	8820 gal	Lined berm	Exempt	Saleable liquids may be sold to a refinery. Remaining liquids may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Waste Water	Above Ground Storage Tank	275 gal	Concrete vault	Non-Exempt	Water may be transported to a Williams evaporation facility or a NMOCD-approved disposal facility.
Used Process Filters	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Empty Drums / Containers	N/A	N/A	Berm or transported to a Williams or Contractor facility.	Non -exempt	Barrels are returned to supplier or transported to a Williams or contractor consolidation point and ultimately recycled/disposed consistent with applicable regulations.
Spill Residue (i.e., soil, gravel, etc.)	N/A	N/A	In situ treatment, land-farm, or alternate method	Incident dependent	Per Section VI, Remediation, in 8/13/93 NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.
Used Absorbents	Drum or other container	Varies	Transported to a Williams or contractor facility in drum or other container	Non-exempt	Transported to a Williams or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Lube Oil	Above Ground Storage Tank	500 gal tank for each engine	Metal tank	N/A	Off-spec material recycled or disposed consistent with applicable regulations.

FIGURES



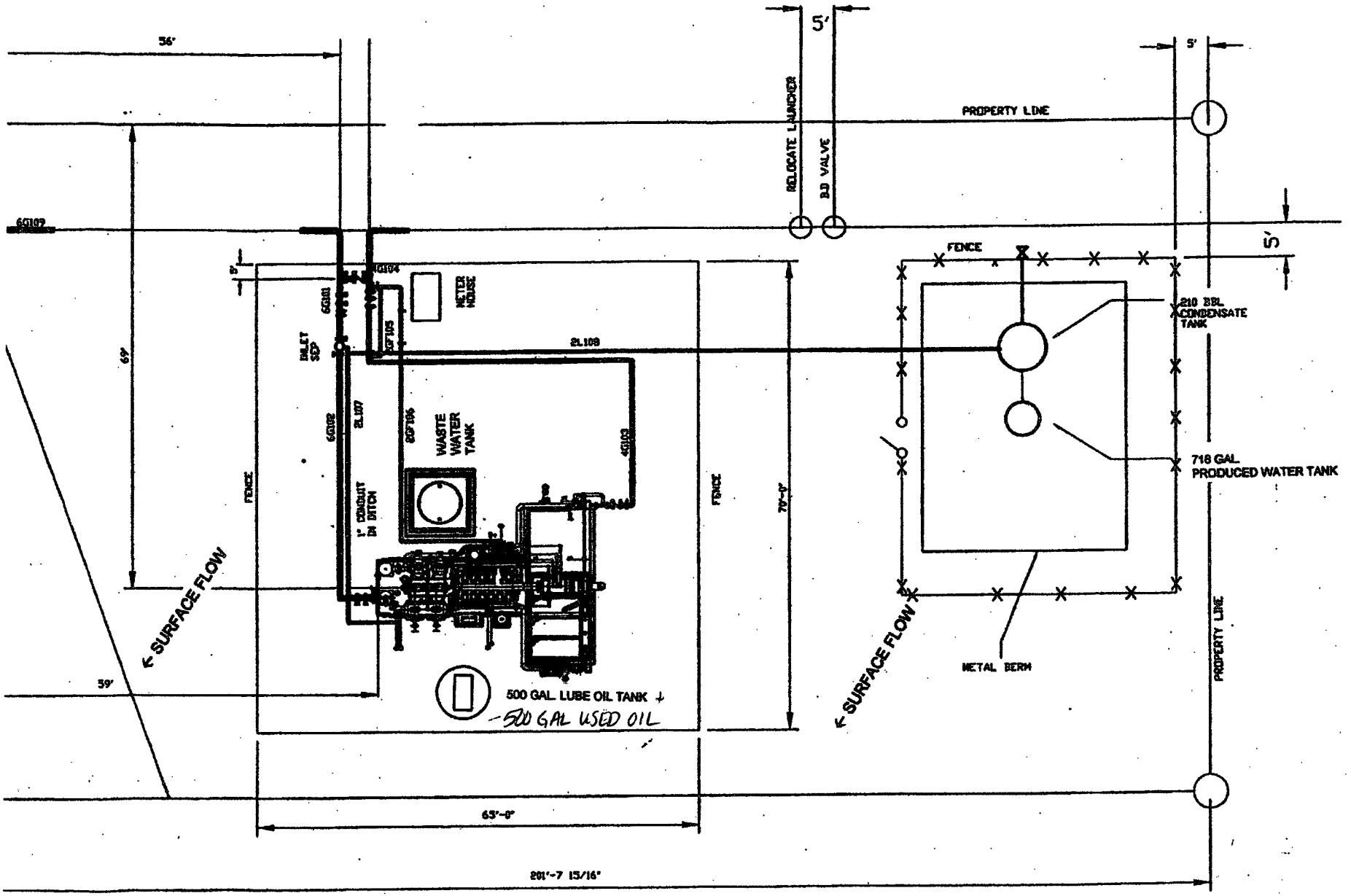
Source: USGS Vigas Canyon and Lapis Point, NM Quadrangles

Figure 1 Site Vicinity / Topographic Map

Honolulu Compressor Station

Section 12, Township 26N Range 5W

Rio Arriba County, New Mexico



Williams Field Services
Honolulu Compressor Station
Rio Arriba County, NM

FIGURE 2

APPENDICES

Appendix A
WFS Spill Control Procedures

RELEASE/SPILL REPORTING

MATERIAL SAFETY DATA SHEETS

CHEMICAL EXPOSURES/POISONINGS

Dial

24HRS/DAY - 7DAYS/WEEK

1-888-677-2370

Info you should have when calling:

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

3E COMPANY

1905 Aston Avenue, Carlsbad, CA 92008
Telephone: 760-602-8700
Fax: 760-602-8888

1.0 PURPOSE

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

2.0 PROCEDURE

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

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

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

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

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

2.6 Facility Pollution Prevention Plans

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

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

2.6.1.2 A Facility Response Plan is a written document that

describes the procedures for responding to a spill.

NOTE

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

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

2.6.3 Operations is responsible for:

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

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

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

2.6.3.4 Performing inspections required by the plan(s)

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

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

2.6.3.7 Ensuring adequate response contractors are available in the area

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

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

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

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

3.0 REFERENCES

3.1 Regulatory

3.1.1 Oil Pollution Prevention Act of 1990

3.1.2 40 CFR 112, Oil Pollution Prevention (EPA)

3.1.3 Applicable state, regional and local regulations

3.2 Related Policies/Procedures

3.2.1 Training CD for SPCC Plans

3.2.2 SIP-ADM-7.15 - Aboveground Storage Tank Integrity

3.3 Forms and Attachments

3.3.1 WES-87 – Record of Secondary Containment Discharge

3.3.2 WES-35 - Release Report Form

3.3.3 6.04-ADM-002 - Release Reporting

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

3.3.5 0019 – External Visual Tank Inspection

3.3.6 SIP-ADM-12.01 - Emergency Response and Planning

3.3.7 Spill Prevention Control and Countermeasure (SPCC) Plan

3.3.8 Facility Response Plan

3.3.9 SIP Feedback/Change Request

4.0 DEFINITIONS

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

4.2 DOT – Department of Transportation

4.3 EPA – Environmental Protection Agency

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

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

4.6 **MMS** – Minerals Management Service

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

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

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

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

4.11 **OSRO** – Oil Spill Response Organization

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

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

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

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

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

4.17 USCG – United States Coast Guard

➢➢➢End of Procedure≺≺≺

System Integrity Plan Change Log

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

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

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

1.0 PURPOSE

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

Note 1:

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

Note 2:

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

2.0 PROCEDURE

2.1 Offshore Release Reporting (w/sheen on water)

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

2.1.1.1 Any release that causes sheen on water.

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

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

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

2.2.1.1 Any Gas release >50 MSCF;

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

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

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

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

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

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

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

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

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

2.3 Onshore Releases

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

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

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

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

2.3.1.4 Any Gas release >50 MSCF;

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

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

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

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

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

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

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

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

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

Note:

Flares and Thermal Oxidizers

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

2.4 Planned / Scheduled Blowdowns

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

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

2.4.3 The Environmental Specialist will:

2.4.3.1 Review information provided;

2.4.3.2 Notify appropriate agencies;

2.4.3.3 Obtain required permits or permissions;

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

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

2.5 Exceptions to Procedure:

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

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

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

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

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

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

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

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

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

2.6 Release Database

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

3.0 REFERENCES

3.1 Regulatory

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

3.1.2 49 CFR 191, 192 and 195

3.2 Related Policies/Procedures

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

3.2.2 5.05-ADM-002 - Accident Reporting

3.2.3 SIP-ADM-12.01 Emergency Response and Planning

3.3 Forms and Attachments

3.3.1 WES-35 - Release Report Form

3.3.2 Onshore Release/Spill Notification Flow Chart

3.3.3 Telephonic and Written Release Reporting Requirements

3.3.4 SIP Feedback/Change Request

4.0 DEFINITIONS

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

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

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

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

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

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

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

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

➢➢➢End of Procedure≺≺≺

System Integrity Plan Change Log

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

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

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

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

Release/Spill Report Form

Month | Day | Year

Release Verification Time: | Release Stop Time:

Region | District | Area

Location Name | Location Identifier

Mainline Name | Mainline Identifier

Area Manager | Company Asset | State

Address | County | Zip Code

Release Discovered by: | Time

Release Reported by: | Time

Section | Township | Range | Milepost | Tract #

Offshore [No] | Latitude | Longitude

Release Reportable? [No] | Waterway Affected? [No] | Name

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

Product Released: | Total [BBL's] Released [0]

BBL's Recovered Wet [0]

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

Total BBL's Recovered [0]

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

Remarks:

Origin Of Release:

Temperature | Relative Humidity | Precipitation

Cloud Cover | Wind Speed | Wind Direction

Injury [No] | Death [No] | Fire [No] | Explosion [No]

Unconsciousness [No] | Hospitalization [No]

Loss/Damage Estimate

Incident Investigator:

Environmental Contact for this Release:

Safety Contact for this Release:

Compliance Administrator for this area:

Form completed by:

Completion Date:

Form was e-mailed to Williams on:

Appendix B
NMOCD Release Notification and Corrective Action

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

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

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

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

Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

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

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

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

Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
E-mail Address:	Conditions of Approval:	Attached ☐
Date: Phone:		

* Attach Additional Sheets If Necessary

Appendix C
Public Notice

PUBLIC NOTICE

Notice of Discharge Plan Renewal Application

Honolulu Compressor Station

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

The facility is located in Sections 12, Township 26 North, Range 5 West, in Rio Arriba County, approximately 22 miles north-northeast of Counselor, New Mexico and provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be greater than 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

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

AVISO PÚBLICO

Aviso del uso de la Renovación del Plan de la Descarga

Honolulu Compressor Station

Conforme a los requisitos de la PROTECCIÓN del AGUA DE TIERRA Y SUPERFICIAL de la regulación 20 NMAC 2.6.2 - de la Comisión del control de calidad del agua de New México -, Williams Field Services Company of 188 County Road 4900, Bloomfield, NM 87413, anuncia por este medio intento para aplicarse a La División de la Conservación del Aceite de New México para renovar el plan de la descarga para la estación del Honolulu Compressor Station. Williams espera someter el uso del permiso a La División de la Conservación del Aceite en Junio 2005.

La facilidad está situada en las secciones 12, Municipio 26 del norte, Gama 5 Del oeste, en el condado de Río Arriba, aproximadamente 22 millas de norte-noreste del Counselor, New México y proporciona la compresión del gas natural y servicios de condicionamiento.

Las direcciones del permiso de la descarga cómo derramamientos, escapes, y otras descargas accidentales a la superficie serán manejadas. La facilidad no descarga las aguas residuales para emerger o las agues subsuperficies. Todas las basuras generadas serán almacenadas temporalmente en tanques o envases con la contención secundaria. Pierda el offsite enviado será dispuesto o reciclado en un sitio aprobado OCD. En el acontecimiento de una descarga accidental, el agua subterránea no será afectada muy probablemente. Se espera que la profundidad estimada del agua subterránea en el sitio sea mayor de 40 pies. Se espera que la concentración disuelta total de los sólidos del agua subterránea del área esté en la gama de 200-2.000 porciones por millón.

Los comentarios o las investigaciones con respecto a esto permiten o el proceso de permiso se puede dirigir a:

Director de la división de la conservación del aceite
1220 Santo Del sur Francis Dr.
FE De Santa Nm 87505
(505) 827-1464

Refiera por favor al nombre de compañía y al nombre del sitio, según lo utilizado en este aviso, o envíe una copia de este aviso al hacer investigaciones, puesto que el Departamento no pudo haber recibido el uso a la hora de este aviso.

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

May 24, 2005

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Bureau of Indian Affairs
Jicarilla Apache Indian Agency
PO Box 167
Dulce, New Mexico 87528

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Honolulu Compressor Station (GW-315). This notice is a requirement pursuant to New Mexico Water Quality Control Commission Regulations. We expect to submit the Discharge Plan Renewal application to the Oil Conservation Division during June 2005.

The facility, located in Section 12, Township 26 North, Range 5 West, Rio Arriba County, New Mexico, approximately 22 miles north-northeast of Counselor, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is expected to be greater than 40 feet. The total dissolved solids concentration of area ground water is expected to be in the range of 200-2,000 parts per million.

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

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

Respectfully submitted,

Monica Sandoval
Environmental Compliance Administrator

7004 2890 0002 1049 0794

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com®
DULCE, NM 87528 OFFICIAL USE

Postage	$ 0.37	UNIT ID: 0012
Certified Fee	2.30	
Return Receipt Fee (Endorsement Required)	1.75	Postmark Here 2005 Clerk: KK4R43
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	$ 4.42	05/24/05

Sent To: Bureau of Ind. Affairs; Jicarilla Apache
Street, Apt. No.; or PO Box No.: PO Box 167
City, State, ZIP+4: Dulce, NM 87528

PS Form 3800, June 2002 See Reverse for Instructions

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

November 3, 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 Permit Renewal Notice for Williams Field Services Facilities

Dear Mr. Lane:

Williams Field Services has the following discharge permits which expire on the dates shown below.

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

WQCC 3106.F. If the holder of an approved discharge permit submits an application for discharge permit renewal at least 120 days before the discharge permit expires, and the discharger is not in violation of the approved discharge permit on the date of its expiration, then the existing approved discharge permit for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge permit continued under this provision remains fully effective and enforceable. An application for discharge permit renewal must include and adequately address all of the information necessary for evaluation of a new discharge permit. 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 permit renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge permit renewal will be assessed a fee equal to the filing fee of $100.00 plus a flat fee dependent upon horsepower rating for gas processing facilities. The $100.00 filing fee is submitted with the discharge permit renewal applications and is nonrefundable.

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

September 1, 2004

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
El Cedro	GW-149	07/26/2004	Passed	
Honolulu	GW- 315	08/05/2004	Passed	Visual inspection, piping above ground
Kutz #1 & #2	GW-045	07/16/2004	Passed	Test done on multiple days
Navajo	GW-182	07/28/2004	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

xc: FCA Environmental 220 File
Denny Foust, OCD Aztec