

GW – 307

**GENERAL
CORRESPONDENCE**

YEAR(S): 2008 - 2011



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor

Joanna Prukop

Cabinet Secretary

Reese Fullerton

Deputy Cabinet Secretary

Mark Fesmire

Division Director

Oil Conservation Division



May 19, 2008

Mr. David Bays
Williams Four Corners, LLC

188 Road 4900

Bloomfield, New Mexico 87413

Re: NOTICE OF DEFICIENCY
Williams Four Corners Compressor Stations
San Juan Basin facilities

Dear Mr. Bays:

The Oil Conservation Division has performed 26 inspections of Williams Four Corners compressor station located in the San Juan Basin. The following stations have been inspected:

- | | |
|-----------------------------------|-------------------------------------|
| 1. (GW-108) 30-5 # 1 | 14. (GW-273) Moore (Idle) |
| 2. (GW-111) 32-8 #2 | 15. (GW-271) Kernaghan |
| 3. (GW-117) 32-7 #1 | 16. (GW-272) Kernaghan B-8 (Idle) |
| 4. (GW-287) Snow Shoe | 17. (GW-136) 29-7 CDP |
| 5. (GW-122) 29-6 # 4 | 18. (GW-307) Laguna Seca |
| 6. (GW-229) Trunk G (Idle) | 19. (GW-364) Bancos CDP |
| 7. (GW-121) 29-6 #2 CDP | 20. (GW-365) Eul CDP |
| 8. (GW-118) 31-6 CDP | 21. (GW-133) 30 - 8 CDP (Idle) |
| 9. (GW-120) Pipkin | 22. (GW-116) 32 - 8 CDP |
| 10. (GW-129) Crouch Mesa | 23. (GW-292) Rosa #1 CDP |
| 11. (GW-208) Hart Mountain (Idle) | 24. (GW-306) Trunk N |
| 12. (GW-091) 32-9 CDP | 25. (GW-134) Decker Junction (Idle) |
| 13. (GW-087) Cedar Hills | 26. (GW-250) Coyote Springs |

The OCD has observed several areas of concern after inspecting these sites. They are as follows:

- Condition 6. Waste Disposal and Storage:** *"The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD."* Williams Four Corners has renewed their permits for 5 of the 26 facilities that are "non-operational". These facilities have been non-operational for more than one year and a few still contain waste material on site, i.e. landfarm soil, solid waste and liquids. Williams Four Corners shall properly dispose of their remaining waste for these facilities.
- Condition 7. Drum Storage:** *"The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. Must store empty drums on their sides with the bungs in place and lined up on a horizontal*

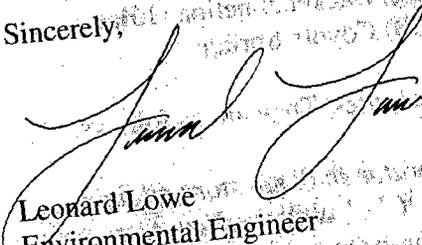


- plane. Must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing. OCD has witness several stations with improper storage of barrels and fluids.
3. **Condition 10. Labeling:** "The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans". Several containers were not labeled.
 4. **Condition 11. A:** "Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours." Several secondary containers were holding a large amount of liquids assumed greater than 72 hours. Williams Four Corners must remove all fluids from secondary containers within 72 hours.
 5. **Condition 8. Process, Maintenance and Yard areas.** "The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface." Secondary containers are present at these facilities but best management practices are not followed. The OCD has witnessed the majority of the stations to have hydrocarbon staining within its facility grounds with the majority near the compressor engines. Williams Four Corners shall prevent any discharging of hydrocarbons directly on to the ground. If a discharge does occur it shall be addressed immediately and not allowed to accumulate. Placing clean gravel over the contamination is not an allowable practice.

The OCD would like to point out these deficiencies. **Please correct as soon as possible and provide the OCD a progress report within 90 days from the date of this letter.** These conditions are assumed by the OCD to be present at all of Williams Four Corners 70 + compressor stations that have a discharge permit. Please reflect these concerns to all of the permitted compressor stations and gas plants owned by Williams Four Corners, LLC. NMSA 1978, Section 70-2-31 (A) authorizes penalties of up to one thousand dollars (\$1000.00) per day per violation for any knowing and willful violation of any provision of the Oil and Gas Act or any rule adopted pursuant to the Act.

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.

Sincerely,



Leonard Lowe
Environmental Engineer

cc: Daniel Sanchez, Enforcement and Compliance Manager
Wayne Price, Environmental Bureau Chief
Brandon Powell, District III Environmental Specialist

AFFIDAVIT OF PUBLICATION

Ad No. 550683

RECEIVED

2008 MAR 11 PM 1 41

STATE OF NEW MEXICO
County of San Juan:

COPY OF PUBLICATION

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

February 27, 2008

And the cost of the publication is \$ 525

Connie Pruitt (signature)

ON 2/27/08 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the foregoing document.

Wynell Corbett (signature) My Commission Expires NOV 1 2008

ATENCIÓN PÚBLICA

Williams Four Corners, LLC, County Road 4900, Bloomfield, NM 87413, presentaron una aplicación de renovación en el marzo de 2008 a la New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division para la descarga antes aprobada planear GW-307 para su Laguna Seca Compressor Station localizada en el SE/4, SW/4 de la Sección 19, Municipio 31 Norte, Recorren 5 Oeste en Rio Arriba County, New Mexico. La instalación, este de aproximadamente 35 millas localizado de Aztec, 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 reventar o subvertir los echaes agua, y por lo tanto la cantidad y la calidad de las descargas no son aplicables. Toda la basura generada será temporalmente almacenada en tanques o contenedores equipados con la contención secundaria. La basura transportó off-site 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 100-400 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.

PUBLIC NOTICE

Williams Four Corners, LLC, 188 County Road 4900, Bloomfield, New Mexico 87413, submitted a renewal application in March 2008 to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan GW-307 for their Laguna Seca Compressor Station located in the SE/4, SW/4 of Section 19, Township 31 North, Range 5 West in Rio Arriba County, New Mexico. The facility, located approximately 35 miles east of Aztec, 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 in the range of 100-400 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.

THE **DAILY TIMES** FARMINGTON, NEW MEXICO

THE FOUR CORNERS INFORMATION LEADER

PO Box 450 Farmington, NM 87499

RECEIVED
2008 FEB 20 PM 2 03

Date: 02/14/08

NM ENERGY, MINERALS & NATURA

NM ENERGY, MINERALS & NA
1220 SOUTH ST. FRANCIS DR.
SANTA FE, NM 87505
(505) 476-3400

Ad#	Publication	Class	Start	Stop	Times	AS/400 Acct
1000914317	FARMINGTO	0152 - Legal Notices	02/13/2008	02/13/2008	1	780352
1000914317	FARMINGTO	0152 - Legal Notices	02/13/2008	02/13/2008	1	780352
Total Cost:						\$261.41
Payment:						\$0.00
Balance Due:						\$261.41

TEXT:

NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY, MINERALS AND NAT

Please include Ad number on your payment.

AFFIDAVIT OF PUBLICATION

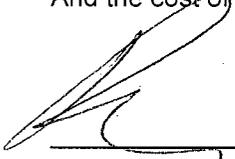
Ad No. 59743

STATE OF NEW MEXICO
County of San Juan:

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

Wednesdays, January 13, 2008

And the cost of the publication is \$261.41



ON 2/15/08 BOB WALLER appeared before me, whom I know personally to be the person who signed the above document.

Wynell Corey
My Commission Expires Nov. 05, 2008



COPY OF PUBLICATION

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-040) Mr. Bill Robertson, Remediation Project Manager, Giant Industries, Inc., 111 County Road 4990, Bloomfield, NM 87413, has submitted a renewal application for the previously approved discharge plan for its Former Bloomfield Refinery, located in the NW/4 of Section 27 and the SW/4 of Section 22, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, located approximately five miles west of Bloomfield, New Mexico. During 2006, approximately 4,600,000 gallons of contaminated ground water was processed in a ground water remediation system. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 5 to 10' feet, with a total dissolved solids concentration of approximately 1,700 to 3,100 mg/l. The discharge plan addresses how contaminated ground water will be remediated and disposed of and how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-126) Weatherford U.S. Limited Partnership, CB Jacobson, Environmental Project Manager, 735 E. 1400 N., Mapleton, UT 84664, has submitted a renewal application for the previously approved discharge plan for their Oil and Gas Service Company, 5432 Highway 64, Farmington N.M., located in the SW/4 NW/4 of Section 19, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, approximately 7/10 mile from the intersection of Highway 64 and Browning Parkway in Farmington, New Mexico. Approximately 16,000 gallons of drilling chemicals, 576 gallons/year of used chemicals, 1000 gallons/year of used oil, and 300 gallons/day of wash water are generated and stored onsite prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 50 feet, with a total dissolved solids concentration of approximately less than 1000 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.

(GW-375) BJ Services Company USA, Mr. Josh Morrisette, HSE Specialist, 11211 FM 2920, Tomball, TX 77375, has submitted an application for a new discharge plan permit for their Oil and Gas Service Company, 3111 Bloomfield Highway, Farmington N.M. 87401, located in the NE/4 NE/4 of Section 23, Township 29 North, Range 13 West, NMPM, San Juan County, New Mexico. Approximately 5000 gallons of Diammonium EDTA, 2000 gallons of Tetra Ammonium EDTA and 110 gallons of PCI-20 are stored at this facility and are used for its oil and gas related business. Its waste streams consist of approximately 5 gallons of methanol and varying amount of general office waste. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 30 feet, with a total dissolved solids concentration of approximately 1,500 - 2,500 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

(GW-307) Williams Four Corners, Mr. David Bays, Senior Environmental Specialist, 188 County Road 4900, Bloomfield, N.M. 87413, has submitted a renewal application for the previously approved discharge plan for their Laguna Seca Compressor Station located in the SE/4 SW/4 of Section 19, Township 31 North, Range 5 West, NMPM, Rio Arriba County, New Mexico, approximately 35 miles east of Aztec, New Mexico. The station provides metering, compression, and dehydration services to various producers for the gathering of natural gas for treatment and delivery. Approximately 2000-8000 bbl/year of produced water/natural gas condensate, 100-5000 gal/year/unit of waste water and 500-2000 gal/year/engine of used engine oil are generated and stored in OCD approved containers onsite within a bermed area prior to disposal at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 250 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), sírvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energía, Minerals y Recursos Naturales de Nuevo México); Oil Conservation Division (Depto. Conservación 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 4th day of February 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

Legal No. 59743 published in The Daily Times, Farmington, New Mexico on Wednesday February 13, 2008

2008 FEB 19 PM 1:49

THE SANTA FE

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NM EMNRD OIL CONSERV
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00246188 ACCOUNT: 00002212
LEGAL NO: 82296 P.O. #: 82100-0000075
461 LINES 1 TIME(S) 400.96
AFFIDAVIT: 7.00
TAX: 32.38
TOTAL: 440.34

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

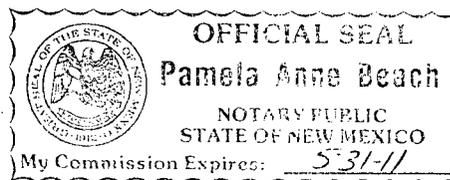
I, T. Valencia, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 82296 a copy of which is hereto attached was published in said newspaper 1 day(s) between 02/14/2008 and 02/14/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 14th day of February, 2008 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ *T. Valencia*
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 12nd day of February, 2008

Notary *Pamela Anne Beach*

Commission Expires: *May 31, 2011*



NOTICE OF PUBLICATION

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

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(GW-076) Mr. Maurice Sticker, Director of Environmental Affairs, Smith Services, 1000 West County Road, Hobbs, NM 88240 has submitted a renewal application for the previously approved discharge plan for its oil field services facility, located in the NW/4 of NW/4 of Section 32, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico, located at 1000 West County Road, Hobbs, New Mexico. Groundwater that is most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 45 feet below ground surface, with a total dissolved solids concentration of approximately 657 mg/l. The discharge plan addresses how contaminated ground water will be remediated and disposed of and how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-072) Mr. Joshua Morrissette, BJ Services, 2708 West County Road, Hobbs, NM 88240, has submitted a renewal application for the previously approved discharge plan for its oil field services facility located in the NW/4 of the NE/4 of Section 20, Township 18 North, Range 38 West, NMPM, Lea County, New Mexico, located at 2708 West County Road, Hobbs, New Mexico. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 52 feet below ground surface with a total dissolved solids concentration of approximately 657 mg/l. The discharge plan consists of a waste management plan and specifies how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. The discharge plan also addresses how chloride contaminated ground water will be remediated and disposed of until the ground water meets standards pursuant to 20.6.2.3103 NMAC of the New Mexico Water Quality Control Commission (WQCC) Regulations.

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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. Per-

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of February 2008.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL
Mark Fesmire,
Director
Legal#82296
Pub. Feb. 14, 2008