GW - 18

GENERAL CORRESPONDENCE

YEAR(S): 2006-1994

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

November 7, 2007

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

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

Dear Mr. Lowe,

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

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

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

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

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

La Cosa (GW-187)

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

Respectfully submitted,

Horton (GW-323) Kernaghan (GW-271)

David Bays

Senior Environmental Specialist

avid Bay-

Attachment

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

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

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

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

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

2008 AUG 23 AM 11 44



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

August 22, 2006

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

Re:

Change of Company Name

Dear Mr. Price:

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

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

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

Sincerely,

David Bays

Senior Environmental Specialist

Attachments

xc:

Clara Cardoza

Monica Sandoval WFS FCA file 210



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

July 26, 2005

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

Re: Discharge Plan GW-181

Dear Mr. Ford:

Enclosed please find the signed copy of the discharge plan conditions for the Williams Field Services (WFS) Trunk M Compressor Station. Also included is check 4027005572 for \$400.00 to cover the flat fee required by the approval conditions.

Williams Field Services appreciates your assistance in handling these approvals and processing the fees. If you have any questions or require additional information, please contact me at 505/632/4606.

Thank you,

Clara M. Cardoza

Environmental Compliance

enclosures

AFFIDAVIT OF PUBLICATION

Ad No. 51659

STATE OF NEW MEXICO County of San Juan:

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

Thursday, May 12, 2005.

And the cost of the publication is \$82.21.

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

My Commission Expires November 17/2008.

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, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

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

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

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

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

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

> STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

MARKFEISMIER, P.E., Director

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

Approach of the control of the contr



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

February 7, 2005

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

Re: Discharge Plan GW-181 and GW-180 Application Renewal and Filing Fee

Dear Mr. Ford:

Enclosed please find copies of Discharge Plan application renewal and check number 4027000115 for \$200.00 to cover the filling fee for the following Williams Field Services (WFS) Compressor Stations:

- Trunk M (GW-181)
- Trunk L (GW-180)

Williams Field Services appreciates your assistance in handling these applications and fees. If you have any questions or require additional information, please contact me at 505/632/4606.

Thank you,

Clara M Garcia

Environmental Compliance

Xc:

Denny Foust, Aztec, OCD Dist III FCA Environmental File 220

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of che	eck No. dated 1/19/05
or cash received on	in the amount of \$ 200.00
from Williams Field Services	
for Trunk L CF	GW-181
Submitted by:	9 . Date: 2-21-05
Submitted to ASD by:	Date:
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PAY TO THE ORDER OF

NEW MEXICO OIL CONSERVATION DIV WATER QUALITY MANAGEMENT FUND 2040 S PACHECO

SANTA FE UNITED STATES NM 87505

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Authorised Signer

SUPPLIER NUMBER 403816



WILLIAMS FIEL FRVICES COMPANY PO Box 21218 Tulsa, 0K74121-1218 Customer Support 1-866-778-2665

HECK NUMBER PAY DATE			TOTAL AMOUNT
01/19/2005 40381		NEW MEXICO OIL CONSERVATION DIV	**********290.00
INVOICE NUMBER	INV. DATE	INVOICE DESCRIPTION	NET AMOUNT
3-JAN-2005	20050113	20 7150	200.00



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

April 4, 2005

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

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

RE: Discharge Permit Renewal GW-181

Williams Field Services, Inc.
Trunk M Compressor Station
Rio Arriba County, New Mexico

Dear Ms. Garcia:

The ground water discharge permit renewal application GW-181 for the Williams Field Services, Inc. Trunk M Compressor Station located in the SW/4 NW/4 of Section 29, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.

The original discharge permit application was submitted on October 28, 1994 and approved February 21, 1995. The discharge permit renewal application letter, dated February 7, 2005, submitted pursuant to 20 NMAC 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge permit is renewed pursuant to 20 NMAC 3106.A. Please note 20 NMAC 3109.E and 20 NMAC 3109.F, which provides for possible future amendment or modifications of the permit. Please be advised that approval of this permit does not relieve Williams Field Services, Inc. of liability should operations result in pollution of surface water, ground water, or the environment.

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

Please note that 20 NMAC 3104 of the regulations provides: "When a 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, Inc. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Ms. Clara Garcia GW-181 Trunk M Compressor Station April 4, 2005 Page 2

Pursuant to 20 NMAC 3109.G.4., this renewal plan is for a period of five years. This renewal will expire on **February 21, 2010**, and Williams Field Services, Inc. should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

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

The discharge plan renewal application for the Williams Field Services, Inc. Trunk M 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 \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating lessr than 1000 horsepower equal to \$400.00. The OCD has received the filing fee.

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

Sincerely,

Roger C. Anderson

Chief, Environmental Bureau Oil Conservation Division

RCA/wjf Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-181 WILLIAMS FIELD SERVICES, INC. TRUNK M COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (April 4, 2005)

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has been received by the OCD. There is a required flat fee equal to \$400.00 for compressor station facilities with horsepower rating less than 1000 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 plan, with the first payment due upon receipt of this approval.

- 2. <u>Williams Field Services Company Commitments:</u> Williams Field Services Company will abide by all commitments submitted in the discharge plan renewal application dated February 7, 2005 and these conditions for approval.
- 3. <u>Waste Disposal</u>: 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. <u>Drum Storage</u>: 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> 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. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

- 9. <u>Below Grade Tanks/Sumps:</u> 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. <u>Underground Process/Wastewater Lines:</u> 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. <u>Housekeeping:</u> 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. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
 - 14. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Storm Water Permit:</u> Williams Field Services Company shall maintain storm water runoff controls. As a result of BP America Production Company's operations any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water runoff then Williams Field Services Company shall notify the OCD within 24 hours, modify the permit within 15 days and submit for OCD approval. Williams Field Services Company shall also take immediate corrective actions pursuant to Item 12 of these conditions.

- 16. Closure: The OCD will be notified when operations of the Trunk M Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk M 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. <u>Certification:</u> Williams Field Services Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.



Four Corners Area Environmental Department #188 County Road 4900 Bloomfield, N.M. 87413 Phone: (505) 632-4608 Fax (505) 632-4781

October 22, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Madam/Sir:

This letter is to advise you that Williams Field Services Company is preparing to submit to the Oil Conservation Division a Discharge Plan Renewal application for the permitted Trunk M Compressor Station (GW-181). 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 October 2004.

The facility, located in Section 29, Township 30 North, Range 6 West, Rio Arriba County, New Mexico, provides natural gas compression and conditioning services.

The discharge permit addresses how spills, leaks, and other accidental discharges to the surface will be managed. The facility does not discharge wastewater to surface or subsurface waters. All wastes generated will be temporarily stored in tanks or containers with secondary containment. Waste shipped offsite will be disposed or recycled at an OCD approved site. In the event of an accidental discharge, ground water most likely will not be affected. The estimated ground water depth at the site is 20 feet. The total dissolved solids concentration of area ground water is expected to range from 1,000 to 2,000 parts per million.

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

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

Respectfully submitted

Clara W. Garcia

Environmental Compliance

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Track & Confirm

Current Status

You entered 7004 1160 0007 4595 7310

Your item was delivered on October 26, 2004 at 9:25am in FARMINGTON, NM 87401. Additional information for this item is stored in files offline. A proof of delivery record may be available through your local Post Office for a fee.

Restoration Options

▶ Restore Offline Item

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Track & Confirm FAQs



NEW MEXICO ENERGY, MEREALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop

Cabinet Secretary

July 12, 2004

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

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

RE: Discharge Plan Renewal Notice for Williams Field Services Facilities

Dear Mr. Lane:

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

GW-315 expires 1/3/2005 – Honolulu Compressor Station

GW-169 expires 1/4/2005 – La Maquina Gas Plant

GW-182 expires 2/21/2005 – Navajo CDP Compressor Station GW-181 expires 2/21/2005 - Trunk M Compressor Station GW-180 expires 2/21/2005 - Trunk L Compressor Station

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

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

Mr. Michael Lane July 12, 2004 Page 2

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

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

Sincerely,

W. Jack Ford, C.P.G.

Oil Conservation Division

cc: OCD Aztec District Office





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

March 7, 2001

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

Re: Storm Water Management Plans

Dear Mr. Ford:

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

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

Thank you,

Clara M Garcia

Environmental Compliance

Xc: Denny Foust, Aztec, OCD Dist III

STORM WATER MANAGEMENT PLAN

LA COSA COMPRESSOR STATION

Williams Field Services Company

March 2001

Table of Contents

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

List of Figures - All figures follow Section VI

Figure 1-1 - Site Vicinity / Topographic Map Figure 1-2 - Facility Plot Plan

I. PURPOSE AND SCOPE

The purpose is to establish a Storm Water Management Plan to monitor and mitigate impact to storm water runoff from the facility. It serves to satisfy storm water management concerns of the NMOCD. It is not intended to comply with 40 CFR Part 122, Storm Water Discharges as this facility is excluded in 122.26 (c) (1) (iii).

II. TYPE OF OPERATION

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

III. LEGALLY RESPONSIBLE PARTY

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

Contact Person:

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

IV. LOCATION OF FACILITY

The La Cosa Compressor Station is located in the Section 34, Township 29 North, Range 11 West, in San Juan County, New Mexico. A site location map is attached as Figure 1-1. The facility layout is illustrated in Figure 1-2. All figures are attached following Section VI of the text.

V. FACILITY DESCRIPTION

This facility is classified as a field compressor station and is unmanned. There are currently 2 compressor units (one 1408 hp unit and on 2980 hp unit) operating at the site. However, the current New Mexico Air Quality Permit for this site allows the installation of 3 additional 1408 hp units. In addition, there are various storage tanks, support structures and ancillary equipment. Records related to facility operations are maintained at central office locations.

VI. STORM WATER MANAGEMENT

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

Site Assessment and Facility Controls

An evaluation of the material used and stored on this site that may be exposed to storm water indicates that no materials would routinely be exposed to precipitation. There are no engineered storm water controls or conveyances; all storm water leaves the site by overland flow.

Any leakage or spill from the identified potential pollutant sources, if uncontained by existing berms,

curbs, or emergency response actions, could flow overland to open off-site drainage ditches (arroyos) and thus impact storm water. In such an event, containment would occur by blocking the ditch or culvert downstream of the pollutant. Cleanup of the substance and implementation of mitigation measures could be conducted while protecting downstream storm watercourses.

Best Management Practices

Following are Best Management Practices (BMPs) to be implemented to prevent or mitigate pollution to storm water from facility operations:

- All waste materials and debris will be properly disposed of on an on-going basis in appropriate containers and locations for collection and removal from the site.
- Temporary storage of potential pollutant sources will be located in areas with appropriate controls for storm water protection. This would include ensuring all containers are sealed/covered and otherwise protected from contact with precipitation.
- Periodic inspection of channels and culverts shall be performed at least twice annually and after any major precipitation event.
- Sediment deposits and debris will be removed from the channels and culverts as necessary and any erosion damage at the outfall (if any) will be repaired or controlled.
- Conduct inspections of the facility on a regular basis as part of the preventive maintenance site
 check. Such inspections will include the visual assessment of corroded or damaged drums and
 tanks, broken or breached containment structures, collapsed or clogged drainages or drain lines.

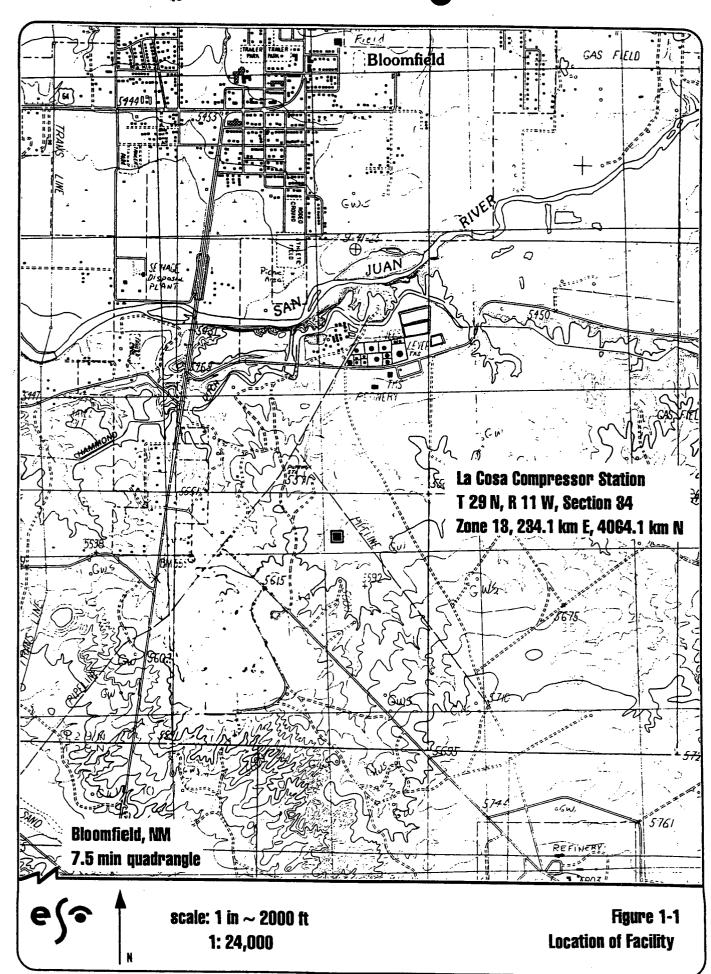
Implementation of the BMPs will prevent or mitigate impact to storm water runoff from this facility.

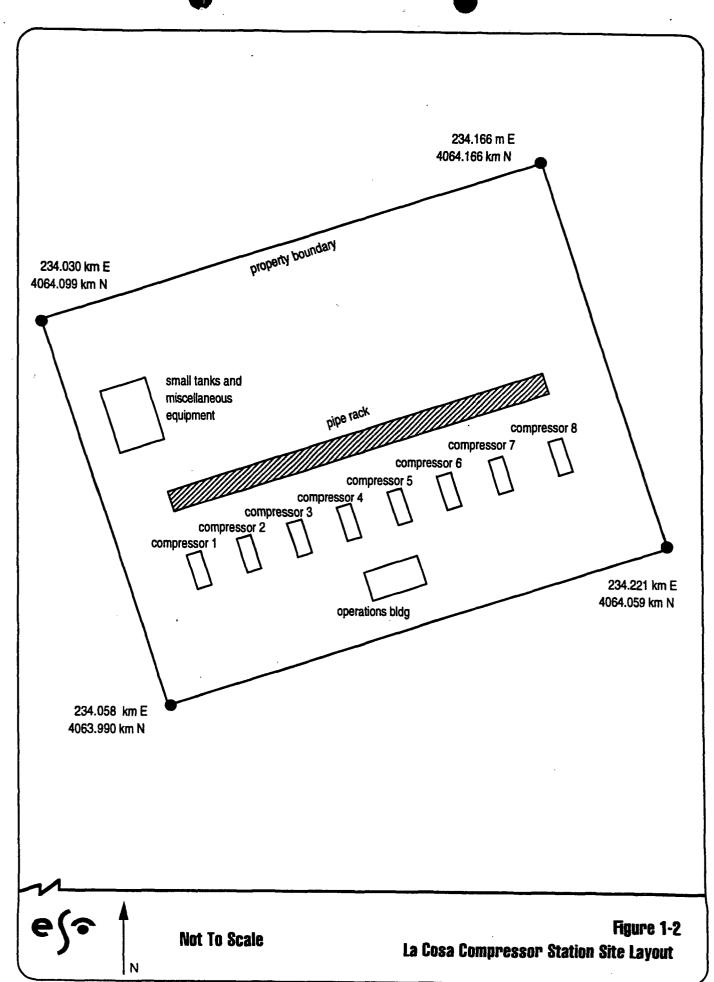
FIGURE 1

SITE VICINITY / TOPOGRAPHIC MAP

FIGURE 2

SITE PLOT PLAN





	SAN JUAN	GATHER	NG SYSTEM	WILLIAMS FIELD SERVICES			
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SITE NAME		DISCHARGE PLAN#	CURRENT OCD PLAN # of Units/ HP	ACTUAL INSTALLS # of Units/ HP	AQB PERMITTED # of Units/ HP	
Category 1	- Upda	ate OCD Plans f	or actual compression; AQE	B permit allows additional	installations	1
31-6 #1	XI'	GW-118	6 units/990 HP ea 5 +4	15 units/1370 HP ea	16 units/1370 HP ea	Notice of acid. 9 um
32-7 #1	X	GW-117	4 units/895 HP ea 🚜	6 units/1357 HP ea	8 units/1357 HP ea	1
32-8 #2	хC	GW-111	4 units/895 HP ea 4+2	5 units/1357 HP ea	9 units/1357HP ea	Notice on rensura
HORSE CYN. CDP			4 units/895 HP ea 14	6 units/1390 HP ea	14 units/1390 HP ea	1
MIDDLE MESA CDP	X C	GW-64	10 units/895 HP ea /o+≠	19 units/1362 HP ea	20 units/1362 HP ea	(mod. to 14 units 9
PUMP MESA CDP			6 units/895 HP ea 6+6	10 units/1363 HP ea	14 units/1363 HP ea	Counts in renew
TRUNK N C.S.				6 units/1140 HP ea	8 units/1368 HP ea	(Lunits in oppie
TRUNK L C.S.	X C	GW-180	6 units/990 HP ea	10 units/990 HP ea	14 units/1131 HP ea	(up to & units in war
Category 2 -	OCD	Plan currently r	reflects all AQB permitted u	nits; however, all units no	t yet installed	0/16:13
29-6 #4CDP		GW-122	10 units; total site HP	6 units/1377 HP ea.; 1	9 units/1377 HP ea.; 1	
	ĺ		,	unit/1148 HP	unit/1148 HP	
32-9 CDP	1		8 units/1379 HP ea	5 units/1379 HP ea	8 units/1379 HP ea	1
CEDAR HILL CDP	1	GW-87	10 units/1386 HP ea 541	7 units/1386 HP ea	10 units/1386 HP ea	OK
KERNAGHAN B-8 STRADD	DLE /		2 units/764 HP ea	1 unit/764 HP	2 units/764 HP ea	1
MANZANARES CDP	7	GW-62	4 units/895 HP ea	3 units/895 HP ea	4 units/1300 HP ea	1
MOORE STRADDLE			2 units/ 778 HP ea	1 unit/ 778 hp	2 units/ 778 hp ea	
NAVAJO CDP			4 units/2946 HP ea	3 units/2916 HP ea	4 units/2916 HP ea	
TRUNK A BOOSTER C.S.			6 units/1367 HP ea	3 units/1367 HP ea	6 units/1369 HP ea	
TRUNK B BOOSTER C.S.		GW-249	7 units/1367 HP ea	3 units/1367 HP ea	7 units/1367 HP ea	1
MARTINEZ DRAW			2 units/1380 HP ea	1 unit/1380 HP	2 units/1232 HP ea	1
QUINTANA MESA		GW-309		1 unit/1232 HP	2 units/1232 HP& 1118 HP	1
Catego)гу 3 -	Update OCD Pl	ans for actual compression	; all AQB permitted units i	nstalled	
29-6 #2CDP	X /	GW-121	5 units/895 HP ea. 5 + 2	12 units/1370 HP ea.	12 units/1370 HP ea.	
ROSA #1 CDP		GW-292		2 unit/1372 HP	2 units/1371 HP ea	1
TRUNK M C.S.	1	GW-181		2 units/1378 HP ea	2 units/1378 HP ea	1
PIPKIN	7	GW-120	2 units/856 HP total	1 unit/1403 HP	1 unit/1403 HP	-change ho sad
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ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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February 14, 2000

CERTIFIED MAIL RETURN RECEIPT NO. Z-142-564-982

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

RE: Discharge Plan Renewal GW-181

Williams Field Services, Inc. Trunk M Compressor Station Rio Arriba County, New Mexico

Dear Ms. Deklau:

The ground water discharge plan renewal application GW-181 for the Williams Field Services, Inc. Trunk M Compressor Station located in the SE/4 NE/4 of Section 29, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.

The original discharge plan application was submitted on November 8, 1994 and approved February 21, 1995. The discharge plan renewal application letter, dated November 30, 1999, submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Williams Field Services, Inc. of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Ms. Ingrid Deklau GW-181 Trunk M Compressor Station February 14, 2000 Page 2

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

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

The discharge plan renewal application for the Williams Field Services, Inc. Trunk M Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of \$50. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating between 1000 and 3000 horsepower equal to one-half of the original flat fee or \$345.00. The OCD has received the filing fee.

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

Sincerely,

Roger C. Anderson

Chief, Environmental Bureau

Oil Conservation Division

RCA/wjf Attachment

xc: OCD Aztec Office

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[] 1	US Postal Service Receipt for Certified Mail No Insurance Coverage Provided. Do not use for International Mail (See reverse)							
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ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-181 WILLIAMS FIELD SERVICES, INC. TRUNK M COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (February 14, 2000)

- 1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor stations with horsepower rating between 1000 and 3000 horsepower. The renewal flat fee required for this facility is \$345.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.
- 2. <u>Williams Field Services, Inc. Commitments:</u> Williams Field Services, Inc. will abide by all commitments submitted in the discharge plan renewal application letter dated November 30, 1999 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261.
- 4. <u>Drum Storage:</u> 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> 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. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

- 9. <u>Below Grade Tanks/Sumps:</u> 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. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
- 11. <u>Class V Wells</u>: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> 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. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Storm Water Plan:</u> The facility will have an approved storm water run-off plan.

- 16. <u>Closure:</u> The OCD will be notified when operations of the Trunk M Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Trunk M 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. <u>Certification:</u> Williams Field Services, Inc., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Williams Field Services, Inc. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:	
WILLIAMS FIELD SERVICES, INC.	
by	



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

November 30, 1999

Mr. Roger Anderson New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505 DEC - 2 1999

Re: OCD Discharge Plan Renewal: Trunk M Compressor Station (GW-181)

Dear Mr. Anderson:

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

May 25, 1999

OCD approval of update

May 11, 1999

WFS Discharge Plan Update (install additional compression)

February 21, 1995

OCD approval of application

November 8, 1994

WFS Application

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

Sincerely,

Ingrid A. Deklau

Senior Environmental Specialist

enclosures

xc: Denny Foust, Aztec OCD Office

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

1.0 GENERAL INFORMATION

1.1 Contact Person

Ingrid Deklau Environmental Specialist 801-584-6543

Landowner

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

2.0. GENERAL PROCESSES

2.2 Spill/Leak Prevention and Housekeeping Procedures

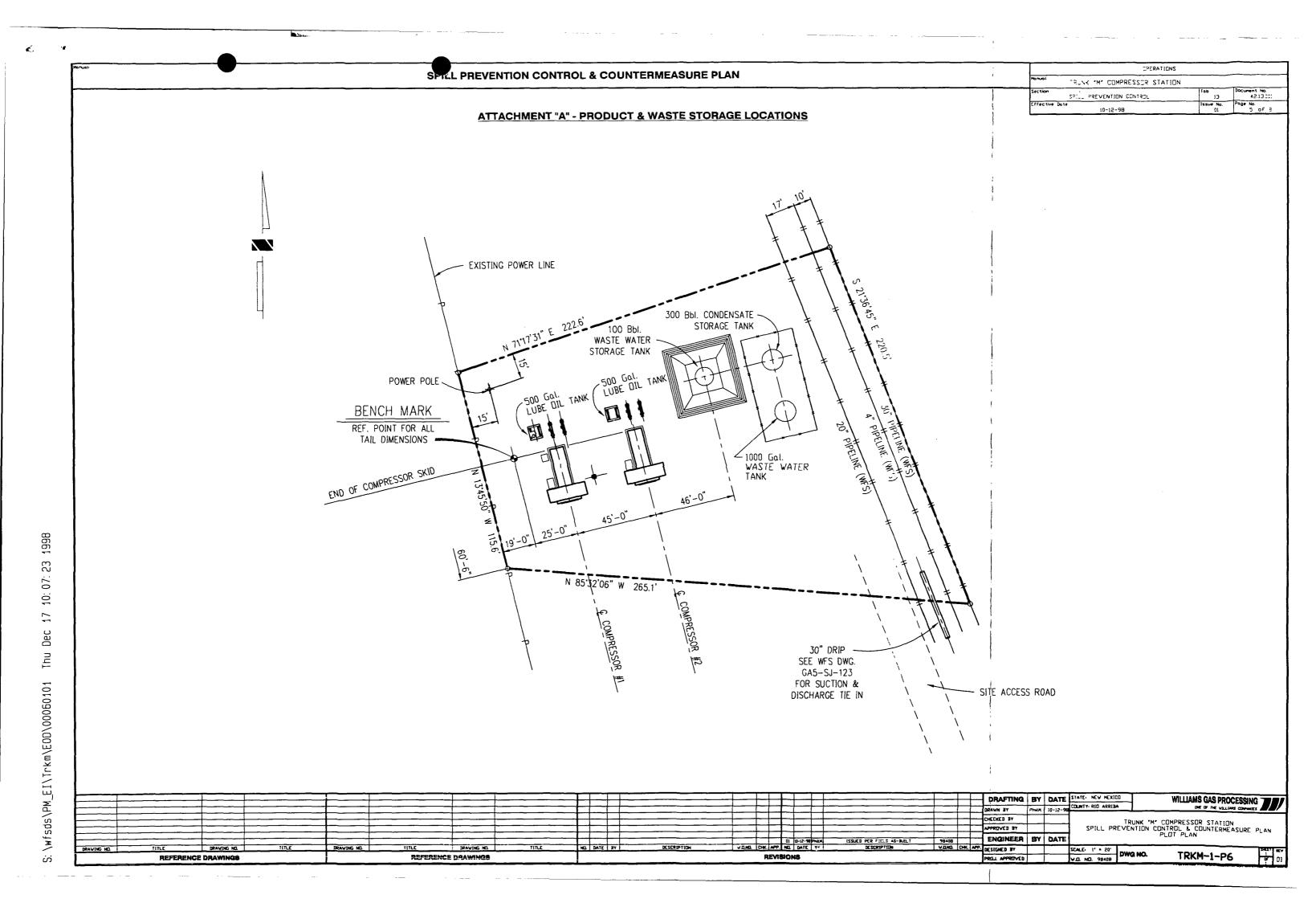
An updated copy of the WFS Corporate policy and procedures for controlling and reporting of Discharges or Spills of Oil or Hazardous Substances is provided following the site diagram included in this letter. WFS Environmental Affairs will report significant spills and leaks to the OCD pursuant to OCD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

2.3 Disposal of Waste Fluids

Section 2.3, as it appears in the October 1994 application is accurate, with the following exception. Used motor oil is not collected in a closed piping system that drains to a common above-ground collection tank. Used motor oil is currently hauled to a POI or WFS collection point as it is generated. From there, the used oil is trucked by an EPA-registered used oil marketer or recycler.

A buried waste-water sump (approximately 1000-gal capacity) that collects water drawn off the condensate tank was not mentioned in the November 1994 plan. The exempt liquid is hauled for disposal to an approved facility.

The disposition of spill residue was not addressed in the original plan. The generation of spill residue can not be predicted, but will be incidental in nature. Spill residue may be landfarmed on site or hauled to an approved disposal facility.



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

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Reporting of

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Document History (ISO9001)

▼Document Body

A. PURPOSE AND SCOPE

- A.1 To establish the policy and procedure for preventing, controlling and reporting of discharges or spills of oil or hazardous substances to the environment in accordance with Company practices and federal, state and local requirements, including Title 40 of the Code of Federal Regulations - Part 112 (Oil Pollution Prevention).
- A.2 This document pertains to Company personnel, Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.
- B. CONTENTS
- C. POLICY
- C.1 General
- C.2 Bulk Storage Tanks
- C.3 Facility Drainage
- C.4 Transfer Operations, Pumping and In-Plant/Station Process
- C.5 Facility Tank Car and Tank Truck Loading/Unloading Rack
- D. PROCEDURE
- D.1 Identifying, Containing and Initial Reporting of a discharge or Spill of a Hazardous or **Toxic Substance**
- D.2 Submitting Written Notification of a Discharge or Spill

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

- C. POLICY
- C.1 GENERAL
- C.1.1 All Company facilities which could discharge or spill, oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the

- C.1.2 Oil, for purpose of this document, means oil of any kind or in any form, including but not limited to petroleum hydrocarbon, fuel oil, Y grade, natural gas liquids, condensate, mixed products, sludge, oil refuse and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) is not considered to be oil.
- C.1.3 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
- a. Section 101(N) and Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- b. Section 307(a) and Section 311(b)(2)(A) of the Clean Water Act
- c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
- d. Section 112 of the Clean Air Act
- e. Section 7 of the Toxic Substance Control Act
- C.1.4 The term hazardous substance does not include petroleum hydrocarbon, including crude oil or any fraction thereof and the term does not include natural gas, natural gas liquids (including condensate), liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.5 Facilities which could discharge or spill, oil or hazardous substances into a watercourse must comply with the applicable federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
- a. Non-Transportation Related Facilities
- (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
- (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
- b. Transportation Related Facilities
- (1) All vehicles, pipeline facilities, loading/unloading facilities and other mobile facilities which transport oil or hazardous substances.
- C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all oil and hazardous substance storage vessels (as defined in a.(1) above) at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencies that must be notified in case of a spill.

- C.1.8 The facility superintendent is responsible for spill prevention. His/her duties include, but are not limited to, the following:
- a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
- b. Conduct annual briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
- c. Briefings should highlight and describe known discharges or spills and recently developed precautionary measures.
- C.1.9 Each individual facility is checked annually by the superintendent or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
- a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.
- b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
- c. An annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.
- C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at regular scheduled intervals for accumulation of oil or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

- C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the oil or substance stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.
- C.2.2 The facility superintendent should evaluate tank level monitoring requirements to prevent tank overflow.
- C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.
- C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

C.3 FACILITY DRAINAGE

- C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from diked areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.
- C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.
- C.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.
- C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:
- a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for precipitation, or displacement by foreign materials.
- b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.
- c. Any dike three feet or higher should have a minimum cross section of two feet at the top.
- C.3.5 Other means of containment or spill control include, but are not limited to:
- a. Berms or retaining walls;
- b. Curbing;
- c. Culverting, gutters, or other drainage systems;
- d. Weirs, booms, or other barriers;
- e. Spill diversion ponds or retention ponds;
- f. Sorbent materials

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

C.4.1 Aboveground valves and pipelines should be examined regularly by operating personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks and metal surfaces.

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

- C.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.
- C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and

outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets that may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

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

D. PROCEDURE

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

Any Employee

- D.1.1 Upon noticing a discharge or spill of an oil or hazardous substance in any quantity shall immediately contain the release (if safe to do so) and notify the facility superintendent, dispatcher, or other designee. Releases must be reported to gas control in the following three circumstances:
- I. The Following Situations Always Require IMMEDIATE Reporting to Gas Control:
- 1. Release reaches or may reach surface water: (pond, lake, wash or ground water;
- 2. Release leaves Williams property; or
- 3. Release is of questionable nature (i.e., unknown product, unknown hazards)
- II. Onsite Releases of Certain Common Industrial Materials Above 10 Gallon Threshold Are Reportable.

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

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

III. Releases of Certain Other Materials Reportable:

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

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

NOTE 1: A release includes material released (intentionally or unintentionally) to air, water,

or soil. When notifying Gas Control of a Release, be prepared to provide information on the type of material spilled, amount released, weather conditions, time and date of release, person discovering release and measures taken to control the release.

NOTE 2: Refer to Attachment A for containment procedures.

Facility Superintendent, Controller or Designee

- D.1.2 Contacts Gas Control immediately by telephone and provides the following information:
- a. Name of company facility and/or location of facility and nature of discharge or spill
- b. Description and quantity of emission or substance discharged
- c. Description of the circumstances causing the discharge or spill
- d. Name, title and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
- e. Action taken or being taken to mitigate and correct discharge or spill
- f. Water bodies or streams involved
- g. Time and duration of discharge or spill
- h. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)

Gas Control Personnel

D.1.3 Advises Environmental Affairs departments immediately by telephone concerning the incident including any incidents reported by persons not employed with the Company.

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

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

Facility Superintendent

- D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.
- D.1.6 If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).
- D.1.7 Advises Environmental Affairs by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

Environmental Affairs

- D.1.8 Assesses reporting requirements to state and federal agencies (contacts Legal Department and Right-of-Way Department, if appropriate). (See Emergency Operating Procedure Manuals).
- D.1.9 Makes appropriate contacts with National Response Center and state and local agencies, when necessary.
- D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee

cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Superintendent or Designee

- D.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:
- a. Time and date of discharge or spill
- b. Facility name and location
- c. Type of material spilled
- d. Quantity of material spilled
- e. Area affected
- f. Cause of spill
- g. Special circumstances
- h. Corrective measures taken
- i. Description of repairs made
- j. Preventative measures taken to prevent recurrence.
- D.2.2 Forwards the completed written description to Environmental Affairs. Retains a copy for future reference.

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

ATTACHMENT A

DISCHARGE OR SPILL CONTAINMENT PROCEDURES AND MATERIALS

TYPE OF FACILITY WHERE THE DISCHARGE OR SPILL OCCURS	PROCEDURES	MATERIALS USED FOR CONTAINMENT
A. Oil Pipeline (as defined in C.1.4)	valves. 2. Contains Discharge or spill by: Ditching covering, applying sorbents, constructing an earthen dam,	4.Plain Wood chips 5.Sorb-Oil Chips Banta Co.
B. Vehicle	1. Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, apply sorbents, or burning. 2. Notifies immediately Environmental Affairs and if there is any imminent danger to local residents; notifies immediately the highway patrol or local police officials.	

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

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If you have any questions, suggestions, comments, or concerns regarding this new database, please contact <u>Document Control.</u>

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

77-7131: (GW-180) - Williams Field Services, Ingrid Deklau, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84108-0900, has submitted a discharge plan renewal application for their Trunk L compressor station located in the NW/4 SW/4, Section 22, Township 28 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 barrels per day of produced water with a total dissolved solids concentration in excess of 2000 mg/lis stored in above ground, closed top steel tanks prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 45 feet with a total dissolved solids concentrate of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be

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

an based on disapprove 1 information available. If a public hearing is held, the Director will approve the plan based on the information in

the plan and information presented at the hearing. GIVEN under the Seal of

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

STATE OF NEW MEXICO SOOIL CONSERVATION DIVISION ं 🤲 🧀 Roger Chandler for LORI WROTENBERY, Director (SEAL)

(Published January 13, 2000.)

ffidavit

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red at Río Grande SUN

Affidavit of Publication

State of New Mexico County of Río Arriba

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

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

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

Danue () and the last publi-

cation on the 13th day of <u>January</u>,

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

Subscribed and sworn to before me this 13% day of

Notary Public

My commission expires 17 May 2001

The Santa Fe New Mexican E & E I W F TO

Since 1849. We Read You.

JAN 132000

NM OIL CONSERVATION DIVISION

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

CT. COMSERVATION DIVISION

NOTICE OF PUBLICATION

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

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

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

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

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

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

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

STATE OF NEW MEXICO **OIL CONSERVATION DIVISION** LORI WROTENBERY,

egal #66710

Pub. January 12, 2000

Director

AD NUMBER: 127477 LEGAL NO: 66710

ACCOUNT: 56689

P.O.#: 00199000278 1 time(s) at \$ 100.51

228 LINES AFFIDAVITS: 5.25

TAX: 6.61 TOTAL: 112.37

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO COUNTY OF SANTA FE

liner 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 a copy of which is hereto attached was published in said newspaper 1 day(s) between 01/12/2000 and 01/12/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 12 day of January, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

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

Notary

Commission Expires



official seal 3 MATHIE NOTARY PUBLIC State of New Mexico

My Commission Expires

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

NOTICE OF PUBLICATION

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

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of chee	ck No dated //-/2-99
or cash received on	in the amount of \$ 50.00
from Williams Field Services	
for Trunk M Compressor Star	tion 6w-181.
Submitted by: Mohure	Date: 12-10-99
Submitted to ASD by:	Date:
Received in ASD by:	Date:
Filing Fee / New Facility	Renewal
Modification Other	
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Organization Code <u>521.07</u>	Applicable Fy 2000
To be deposited in the Water Quality	y Management Fund.
Full Payment or Annual 1	Increment

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1800 South Ballimore Avenue Pro/Boxeas Tries OK 78 101-0645

DATE: 11/12/1999

PAY -- *******\$100 00

VOID AFTER 180 DAYS

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PAY TO THE ORDER OF:

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

SANTA FE United States

NM 87504

(70/3) (8/07)

INVOICE NUMBER	INVOICE DATE	BATCH NAME	INVOICE DESCRIPTION		NET AMOUNT
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MA1353(MAPAP001) (AP - REGULAR)

August 23, 1999

CERTIFIED MAIL RETURN RECEIPT NO. Z-274-520-525

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

RE: Discharge Plan GW-181 Renewal

Trunk M Compressor Station San Juan County, New Mexico

Dear Ms. Deklau:

On February 21, 1995, the groundwater discharge plan renewal, GW-181, for the Williams Field Services Trunk M Compressor Station located in the SE/4 NE/4 of Section 29, Township 30 North, Range 6 West, NMPM, San Juan County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on February 21, 2000.

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

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

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

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

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

Sincerely,

Roger C. Anderson

Chief, Environmental Bureau Oil Conservation Division

RCA/wjf

enclosed: Discharge Plan Application form

cc: OCD Aztec District Office

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

Fost Office, State, & ZIP Code

Postage

Certified Fee

Special Delivery Fee

Return Receipt Showing to Whom & Case Delivered

Return Receipt State Whom
Date, & Addresses Applies To TOTAL Postage & Fees

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

May 25, 1999

CERTIFIED MAIL RETURN RECEIPT NO. Z-357-870-097

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

RE: Site N

Site Modifications Notification

GW-181, Trunk M Compressor Station

San Juan County, New Mexico

Dear Ms. Deklau:

The OCD has received the site modification letter, dated May 11, 1999, from Williams Field Services for the Trunk M Compressor Station GW-181 located in SE/4 NE/4, Section 29, Township 30 North, Range 6 West, NMPM, San Juan County, New Mexico. The requested modification is considered a minor modification to the above referenced discharge plan and public notice will not be issued. The site modifications are approved without modification to the discharge plan with the stipulation that all modifications comply with the discharge plan approved Febrary 21, 1995.

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

Sincerely,	

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

cc: Mr. Denny Foust - Aztec District Offic

PS Form 3800, April 1995

-181	Postmark or Date
49	TOTAL Postage & Fees
	Return Receipt Showing to Whom, Date, & Addressee's Address
	Return Receipt Showing to Whom & Date Delivered
	Restricted Delivery Fee
	Special Delivery Fee
	Certified Fee
\$	Postage
275	Post Office, State, & ZIP Code
23	Street & Number 123
	Sent to Ingric
Provided. nal Mail <i>(See reverse)</i>	No Insurance Coverage Provided: Do not use for International Mail (See reverse)

us Postal Service Receipt for Certified



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

May 11, 1999

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

Re: Modification of Williams Field Services Discharge Plan for Trunk M (GW – 181)

Dear Mr. Ford:

Pursuant to our conversation today and my March 1999 submittal to you, Williams Field Services (WFS) formally requests modification to the Discharge Plan for the Trunk M compressor site for the installation of one additional 1378 horsepower unit. No additional waste streams will be generated with this modification. With this modification, there are two 1378 horsepower units operating at the site. This corresponds to permitting levels allowed by the Air Permit currently held for this site.

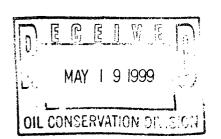
If you have any questions or require additional information, I can be reached at 801-584-6543.

Sincerely,

Ingrid Deklau

Environmental Specialist

XC: Denny Foust, Aztec OCD





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

May 14, 1999

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

Re: WFS Requests for Modification of Various OCD Discharge Plans

Dear Mr. Ford:

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

Category 1 Update OCD Plans for actual compression; AQB permit allows additional installs

Category 3 Update OCD Plans for actual compression; all AQB permitted units installed

Category 5 Current OCD Plan reflects actual installs; AQB permit allows additional installs.

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

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

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

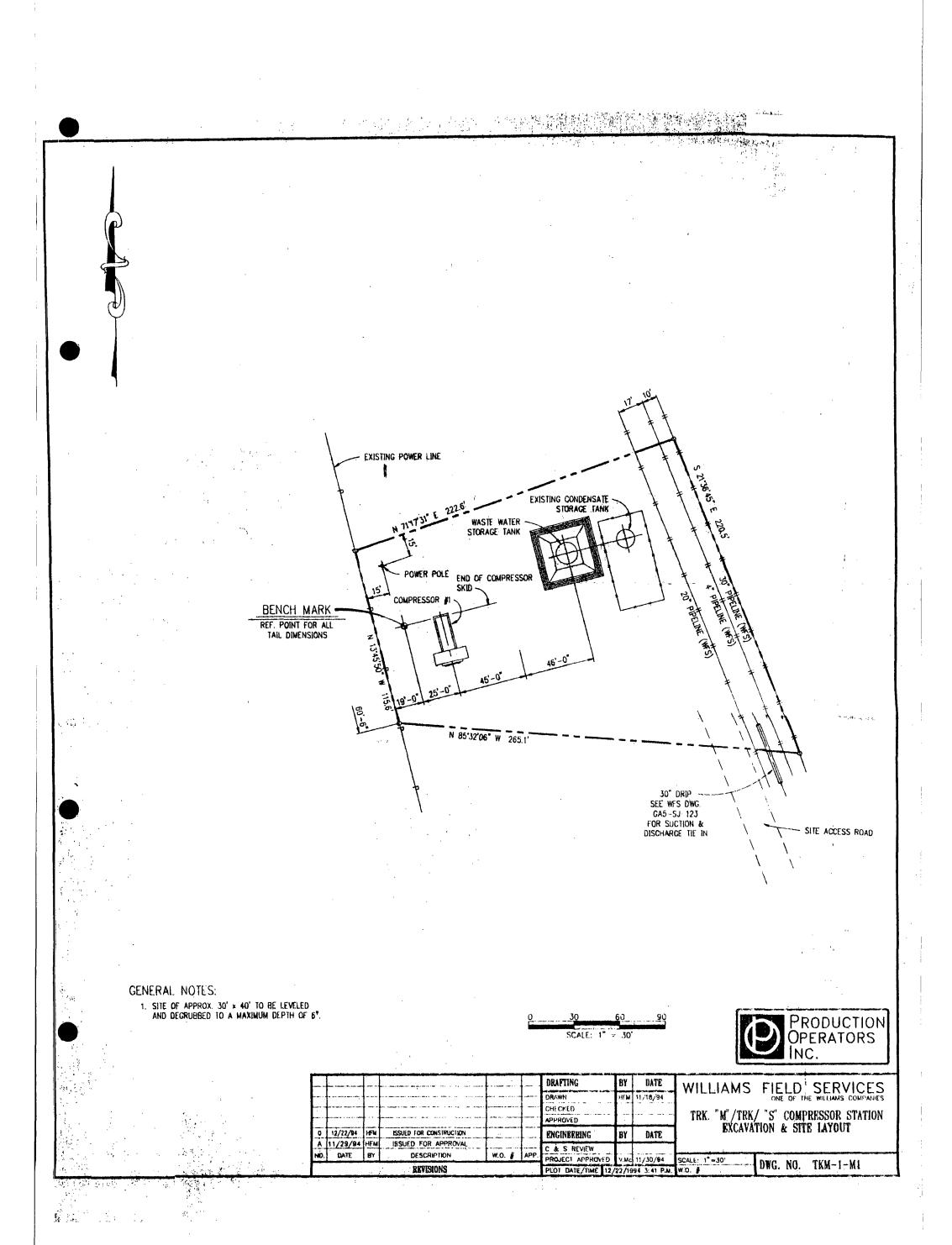
For sites that fall under Category 5, the OCD Discharge Plan properly reflects the current number of units installed, but the Plan should be modified to allow for the additional units allowed under WFS Air Permits for the site.

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

Sincerely,

Ingrid Deklau Environmental Specialist

Xc: Denny Foust, Aztec OCD





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

RECEIVED

JAN 0 6 1995

December 29, 1994

OIL CONSERVATION DIV. SANTA FE

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

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

Dear Mr. Anderson:

Enclosed please find three copies of the site plan for Williams Field Services' Trunk M Compressor Station located in Rio Arriba County, New Mexico. A Discharge Plan was submitted for this site in November, but the engineering drawings were not available at the time of submittal.

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

Sincerely,

Leigh E. Gooding,/P.G. Environmental Specialist

Attachments

WECEIVED USPWS-AFO 1190 JAN 17

NOTICE OF PUBLICATION

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

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

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

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(GW-182) - Williams Field Service, Leigh Gooding, Environmental Specialist, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their Navajo CDP compressor station located in the SE/4 NW/4, Section 2, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Approximately 1 barrel per day of produced water with a total dissolved solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 20 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

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

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

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

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

SEAL

NO EFFECT FINDING

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

Date January 27, 1995

Consultation # $\frac{2-22-95-1-142}{}$

Approved by R. Mark Wilto

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

AFFIDAVIT OF PUBLICATION

No.34246

STATE OF NEW MEXICO County of San Juan:

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

Thursday, January 19, 1995

and the cost of publication was: \$75.51

on 20 ROBERT LOVETT

above document.

appeared before me, whom I know personally to be the person who signed the

My Commission Expires April 22, 1997.

COPY OF PUBLICATION

Legals



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

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

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

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

NOTICE OF **PUBLICATION** STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES # DEPART-MENT OIL CONSERVATION

DIVISION

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

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(GW-182) - Williams Field Service, Leigh Gooding. Environmental Specialist, O. Box 58900, M.S. 10368,

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

STATE OF NEW MEXICO OIL CONSERVATION DIVISION WILLIAM, J. LEMAY,

Director

SEAL) Published January 19, 1995)

Affidavit of the station of Division

EW MEXICO o Arriba

Trapp, being first duly sworn, declare and say there am the Pub-Rio Grande Sun, a weekly newspaper, published in the English lanaving a general circulation in the City of Espanola and County of tate of New Mexico, and being a newspaper duly qualified to pubices and advertisements under the provisions of Chapter 167 of the tal discharges to the surface 1 of 1937; that the publication, a copy of which is hereto attached,

d in said paper once each week for consecutive weeks, and
day of each week in the regular issue of the paper during the time
n, and that the notice was published in the newspaper proper, and
pplement, the first publication being on theday of
pplement, the first publication being on the day of
Au. 1975. and the last publication on the 9 day
and the last publication on the day

that payment for said advertisement has ade), or (assessed as court costs); that the undersigned has personof the matters and things set forth in this affidavit.

dien Subscribed and sworn to before me this day of

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11	. !				

My Commission expires

SS - Stand Sales

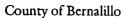
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STATE OF NEW MEXICO







Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, times, the first publication being of the 19th day _, 1995, and the subsequent consecutive publications

Sworn and subscribed to before me, a notary Public in COPPLIAL SRAE and for the County of Bernalillo and State of New Megan Millage Mexico, this_ Jan 1995, NOTARY PUBLIC STATE OF NEW MEXIC

PRICE Statement to come at end of month.

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

NOTICE OF PUBLICATION

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

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

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

·	I hereby acknowledge i	receipt of check	c No.	dated 11-22-54,
	or cash received on		in the amount o	es 10000
	from WILLIAMS FIE	LD SERVICES (·(100
	for TRUNK 'L' COMP	RESSOR STATION RESSOR STATION	(BW-180)	•
·	Submitted by:		" Date:	(DP Na.)
	Submitted to ASD by: _(AHRIS FUSTICE	Date:	12-30-54
•	Received in ASD by:	MM	Date:	12-30-94
	Filing Fee	New Facility _	Renewal	
	Modification	Other		
	Organization Code	(spandy)		95
	To be deposited in the			nd.
WILLIAMS I	FIELD SERVICES COMPANY ONE OF THE WILLIAMS COMPANIES	: /	Corestates Bank of De In cooperation with 1	
P. O. Box 589	Processing Company 00 y, Utah 84158-0900	11/22/94	CHECK NO.	********100.00
PAY ONE HUNDRI	ED AND 00/100 DOLLARS			
TO THE ORDER OF	NEW MEXICO OIL & GAS CO STATE LAND OFFICE BUILD 310 OLD SANTA FE ROAD SANTA FE, NM SANTA FE, NM		Williams Field Service WICE PRESIDE AUTHORIZED REPRESENT	NT

NOV 1 6 1994
OIL CONSERVATION DIV.

DISCHARGE PLAN

SAN JUAN GATHERING SYSTEM TRUNK M COMPRESSOR STATION

Williams Field Services Company
October 1994

1.0 GENERAL INFORMATION

1.1 Legally Responsible Party

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

Contact Person

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

1.2 Location of Discharge

The Trunk M Compressor Station is located NWSE of the NE 1/4 of Section 29, Township 30 North, Range 6 West, Rio Arriba County, New Mexico. A vicinity map is attached (Gomez Ranch, New Mexico) as Exhibit 1. The cleared site for this Compressor Station is approximately 0.9 acres. The site boundary survey is provided in Figure 1.

1.3 Type of Natural Gas Operation

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

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

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

1.4 Affirmation

Robert Peacock

	I am familiar with the information contained application and that such information is	
accurate and complete	to the best of my knowledge and belief.	
A. A		
out lecerch	October 28, 1994	
ture	Date	

Project Manager

2.0 GENERAL PROCESSES

2.1 Process Fluids

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

Sample Washdown Wastewater

<u>Parameters</u> TDS, pH, BETX, As, Ba, Cd, Cr, Pb, Hg, TOX.

Used Motor Oil

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

Additional Chemicals listed in WQCC 1-101.44 and 3-103 are not expected to be present in any process fluids or in the coal seam gas transported at the Trunk M Compressor Station $\frac{1}{2}$

2.2 Spill/Leak Prevention and Housekeeping Procedures

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

Environmental Protection will be a contractual obligation as follows:

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

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

Sources and Disposition of Process Fluids

TABLE 1

<u>Source</u>	<u>Disposition</u>	Quantity	Quality Type	<u>Additives</u>
Compressor Engines	Collected Separately in Tank	125 gal each quarter	Used Motor Oil	None
Gas Inlet Separator	Collected Separately in Blowdown Tank	Variable, available for upsets	High TDS Water	None
Washdown water	Collected Separately in Tank	Intermittent	Rainwater, Tapwater with Traces of Used Motor Oil & TEG	Soap
Lube 0il	Compressor Engines		Motor Oil	None

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

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

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

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

2.3 <u>Disposal of Waste Fluids</u>

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

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

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

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

3.0 <u>Site Characteristics</u>

A. <u>Hydrologic Features</u>

The Trunk M Compressor Station is located in the NE 1/4 of Section 29, Township 30 North, Range 6 West, Rio Arriba County, approximately twenty-two miles east of Blanco, New Mexico. The graded site elevation is approximately 6,260 feet above sea level. The undeveloped site is covered by sagebrush, crested wheat grass, and native grasses. The site is underlain by quaternary alluvium which has been deposited over the sandstones and shales of the San Jose and Nacimiento Formation.

The site is located on a gentle north-facing slope approximately 100 feet south of Frances Creek, an ephemeral stream. La Jara Canyon is located three miles north of the site at an elevation of approximately 6100 feet. Based on the elevation of surface water in La Jara Canyon, the expected depth to groundwater at the subject site is 160 feet below ground surface. A review of the available hydrologic data for this area revealed that the closest documented source of ground water are the alluvial deposits of Frances Creek at an elevation of 6240 feet.

These alluvial deposits are also the only identified down-gradient sources of ground water nearby the site. Ground water within these alluvial deposits flows to the west toward Navajo Reservoir, which is located at an elevation of approximately 6,100 feet. The ground water in the alluvial deposits is expected to have a total dissolved solids (TDS) concentration of approximately 2,000 mg/l. In addition, in 1953 Phillips Petroleum drilled a well in Section 35, T30N, R6W which penetrated the Ojo-Alamo Sandstone and encountered water with a TDS concentration of 1,239 mg/l.

The nearest identified ground water well is owned by El Paso Natural Gas (SJ-0741) and is located in the SE 1/4 of Section 17, Township 30 North, Range 6 West at approximately 6410 feet elevation. The well is reportedly screened from 422 to 2010 feet. No downgradient wells were identified within a one mile radius of the subject site.

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

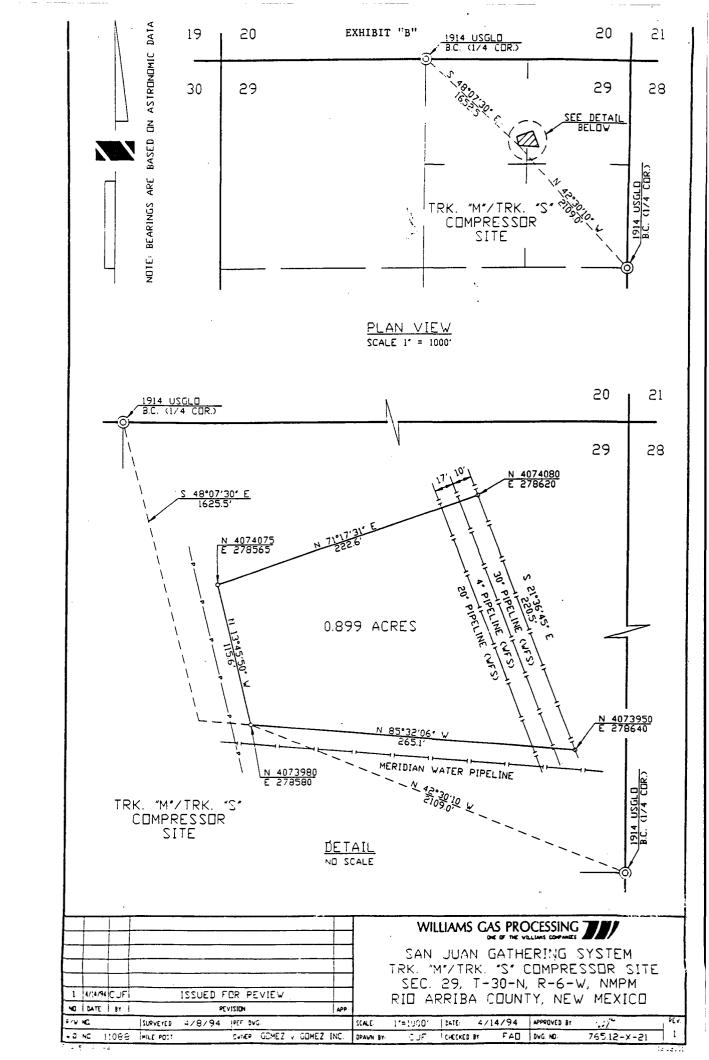
Lyford, F.P., "Ground Water in the San Juan Basin, New Mexico and Colorado", U.S.G.S. Water-Resource Investigations 79-73, May, 1979.

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

B. <u>Flood Protection</u>

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

FIGURE 1 SITE BOUNDARY SURVEY



APPENDIX A SPILL CONTROL PROCEDURES



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

A. PURPOSE AND SCOPE

- A.1 To establish the policy and procedure for preventing, controlling, and reporting of spills or discharges of oil or hazardous substances to the environment in accordance with Company practices and federal, state, and local requirements, including Title 40 of the Code of Federal Regulations Part 112 (Oil Pollution Prevention).
- A.2 This document pertains to Company personnel and Company and non-company facilities. The spill prevention and control requirements in this Policy and Procedure are Federally mandated guidelines for oil pollution prevention. The Company policy is to also apply these standards, where appropriate, to facilities containing hazardous substances. This is a discretionary application of the standards; however, variations from the standards should be approved by the responsible Director.

B. <u>CONTENTS</u>

C. POLICY

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

D. PROCEDURE

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

ATTACHMENT A: Discharge or Spill Containment Procedures and Materials

C. POLICY

C.1 GENERAL

- C.1.1 All Company facilities which could discharge or spill oil or hazardous substances which may affect natural resources or present an imminent and substantial danger to the public health or welfare including, but not limited to fish, shellfish, wildlife, shorelines, and beaches are subject to the provisions of this document.
- C.1.2 Hazardous Substance, for purposes of this procedure, is defined as any chemical or material that has or should have a Material Safety Data Sheet (MSDS); however, hazardous substances are further defined by the following environmental statutes:
 - Section 101 (N) and Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
 - b. Section 307(a) and Section 311 (b)(2)(A) of the Clean Water Act
 - c. Section 3001 of the Solid Waste Act (excluding items suspended by Congress)
 - d. Section 112 of the Clean Air Act
 - e. Section 7 of the Toxic Substance Control Act

Supersedes Policy and Procedure 12.10.020 dated July 7, 1989.

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- C.1.3 The term hazardous substance does not include petroleum, including crude oil or any fraction thereof, which is not otherwise specifically listed or designated as a hazardous substance in the first sentence of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- C.1.4 Oil, for the purpose of this document, means oil of any kind or in any form, including but not limited to petroleum, fuel oil, Y grade, mixed products, sludge, oil refuse, and oil mixed with wastes other than dredged spoil (earth and rock). LPG (propane, butane, ethane) are not considered to be oil.
- C.1.5 Facilities which could discharge or spill oil or hazardous substances into a watercourse must comply with the required federal, state, or local laws and regulations. A discharge includes but is not limited to any spilling, leaking, pumping, pouring, emitting, emptying, or dumping. A watercourse is any perennial or intermittent river, stream, gully, wash, lake, or standing body of water capable of collecting or transporting an oil or hazardous substance.
- C.1.6 Facilities which are subject to the requirements stated in this policy are as follows:
 - a. Non-Transportation Related Facilities
 - (1) Storage or drip tanks and other aboveground containers (excluding pressurized or inline process vessels) having a capacity in excess of 660 gallons for each single container or an aggregate capacity of 1,321 gallons or more for multiple containers.
 - (2) Underground storage facilities having a total capacity in excess of 42,000 gallons.
 - b. Transportation Related Facilities
 - (1) All vehicles, pipeline facilities, loading/unloading facilities, and other mobile facilities which transport oil or hazardous substances.
- C.1.7 Each Company location which has facilities subject to paragraph C.1.1 shall have a site specific Spill Prevention Control and Countermeasure Plan (SPCC Plan) which identifies all facilities subject to 40 CFR 112. The plan shall identify all hazardous substance storage vessels at the facility and the spill prevention measures in place to control discharges or spills. This plan shall also identify all regulatory agencys that must be notified in case of a spill.
- C.1.8 The facility supervisor is responsible for spill prevention. His/her duties include, but are not limited to, the following:
 - a. Instructing personnel in the operation and maintenance of equipment to prevent the discharge of oil.
 - b. Conduct briefings for operating personnel at intervals frequent enough to assure adequate understanding of the Spill Plan at that facility.
 - c. Briefings should highlight and describe known discharges or spills, and recently developed precautionary measures.
- C.1.9 Each individual facility is checked by the supervisor or designee to determine the potential for discharges or spills of oil or hazardous substances in harmful quantities that violate water quality standards or which may cause a film, sheen, or discoloration on the surface of water. All facilities which have the potential for discharging or spilling harmful quantities of oil or hazardous substances into a watercourse are required to have the following preventive measures:
 - a. Examination of all tanks, valves and fittings, at least annually, to determine any maintenance requirements.



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

- b. All tank batteries should, as far as practicable, have a secondary means of containment for the entire contents of the largest single tank plus sufficient freeboard in the containment facility to allow for precipitation.
- c. A annual monitoring and inspection program to prevent accidental spills or discharges into watercourses. This includes annual inspection for faulty systems and monitoring line valves and liquid pipelines for leaks or blowouts.
- C.1.10 Any field drainage ditches, road ditches, traps, sumps, or skimmers should be inspected at annual scheduled intervals for accumulation of liquid hydrocarbons or other hazardous substances which may have escaped from small leaks. Any such accumulations should be removed.

C.2 BULK STORAGE TANKS

- C.2.1 A tank should not be used for storage of oil or hazardous substances unless the material and construction of the tank is compatible with the material stored and conditions of storage such as pressure and temperature. Buried storage tanks must be protected from corrosion by coatings, cathodic protection, or other methods compatible with local soil conditions. Aboveground tanks should be subject to visual inspection for system integrity.
- C.2.2 The facility supervisor should evaluate level monitoring requirements to prevent tank overflow.
- C.2.3 Leaks which result in loss of oil or hazardous substances from tank seams, gaskets, rivets and bolts sufficiently large to cause accumulation of oil or hazardous substances in diked areas should be promptly corrected.
- C.2.4 Mobile or portable oil or hazardous substances storage tanks should be positioned or located to prevent the contents from reaching a watercourse. The mobile facilities should be located so their support structure will not be undermined by periodic flooding or washout.

C.3 FACILITY DRAINAGE

- C.3.1 Make provisions for drainage from diked storage areas where necessary in areas with high precipitation levels. Drainage from dike areas should be restrained by valves or other means to prevent a discharge or spill. Diked areas should be emptied by pumps or ejectors which are manually activated. Valves used for the drainage of diked areas should be of manual, open-and-closed design.
- C.3.2 Rain water may be drained from diked areas providing drainage water does not contain oil or hazardous substances that may cause a harmful discharge. Drain valves must be closed following drainage of diked areas.
- C.3.3 When possible, drainage systems from undiked areas should flow into ponds, lagoons, or catchment basins designed to retain oil or hazardous substances or return the substances to the facility. Any drainage system which is not designed to allow flow into ponds, lagoons, or catchment basins should be equipped with a diversion system that could, in the event of a discharge or spill, contain the oil or hazardous substances on the Site.
- C.3.4 The principal means of containing discharges or spills is the use of dikes which are constructed wherever regulated quantities of oil or hazardous substances have the potential of reaching a watercourse. The construction of dikes must meet the following requirements:
 - a. Capacity must be at least equivalent to the storage capacity of the largest tank of the battery plus sufficient freeboard to allow for pecipitation, or displacement by foreign materials.
 - b. Small dikes for temporary containment are constructed at valves where potential leaking of oil or hazardous substances may occur.



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- c. Any dike three feet or higher should have a minimum cross section of two feet at the top.
- C.3.5 Other means of containment or spill control include, but are not limited to:
 - a. Berms or retaining walls;
 - b. Curbing;
 - c. Culverting, gutters, or other drainage systems;
 - d. Weirs, booms, or other barriers;
 - e. Spill diversion ponds or retention ponds;
 - f. Sorbent materials

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

- C.4.1 Aboveground valves and pipelines should be examined annually by operating personnel to determine whether there are any leaks from flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, valve locks, and metal surfaces.
- C.5 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK
- C.5.1 Rack area drainage which does not flow into a catchment basin or treatment facility designed to handle spills should have a quick drainage system for use in tank truck loading and unloading areas. The containment system should have a maximum capacity of any single compartment of a truck loaded or unloaded in the station.
- C.5.2 Aboveground piping that has potential for damage by vehicles entering the Site should be protected by logically placed warning signs or by concrete-filled pipe barriers.
- C.5.3 Loading and unloading areas should be provided with an interlocked warning light, grounding shutdown, physical barrier system, or warning signs to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. All drains and outlets of any truck should be closely examined for leakage prior to filling and departure. All drains and outlets which may allow leakage should be tightened, adjusted, or replaced to prevent liquid leakage while in transit.

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

D. PROCEDURE

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

Any Employee

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

NOTE: Refer to Attachment A for containment procedures.

Facility Supervisor

- D.1.2 Contacts Gas Control and responsible Director <u>immediately</u> by telephone and provides the following information:
 - a. Name of company facility and/or location of facility and nature of discharge or spill
 - Description and quantity of emission or substance discharged
 - c. Name, title, and telephone number of person initially reporting the discharge or spill and person reporting to Gas Control
 - d. Action taken or being taken to mitigate and correct discharge or spill
 - e. Water bodies or streams involved
 - f. Time and duration of discharge or spill
 - g. Outside involvement during discharge or spill (public government agencies, etc. See Emergency Operating Procedure Manuals)



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Gas Control Personnel

D.1.3 Advises Environmental Services departments <u>immediately</u> by telephone concerning the incident including any incidents reported by persons not employed with the Company.

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

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

Facility Supervisor

- D.1.5 Coordinates containment and clean-up of discharge or spill, keeping the responsible Director Informed.
- D.1.6 If the discharge or spill is too large for Company personnel to contain, contacts qualified local contractors for assistance. (See Emergency Operating Procedure Manuals tab #11, contractors with available equipment and services).
- D.1.7 Advises Environmental Services by telephone if emergency containment or clean-up assistance from a state agency or a response team from the U.S. Coast Guard is required.

Environmental Services

- D.1.8 Contacts Legal Department (and Right-of-Way Department, if appropriate) and assesses reporting requirements to state and federal agencies. (See Emergency Operating Procedure Manuals).
- D.1.9 Makes appropriate contacts with U.S. Coast Guard and state agencies when necessary.
- D.1.10 If spill is significant, dispatches Environmental Specialist to scene to oversee cleanup and reporting responsibilities.

D.2 SUBMITTING WRITTEN NOTIFICATION OF A DISCHARGE OR SPILL

Facility Supervisor

- D.2.1 Completes a written description of the incident as soon as possible after initial notification is given, which should include the following:
 - a. Time and date of discharge or spill
 - b. Facility name and location
 - c. Type of material spilled
 - d. Quantity of material spilled
 - e. Area affected
 - f. Cause of spill
 - g. Special circumstances
 - h. Corrective measures taken
 - i. Description of repairs made
 - Preventative measures taken to prevent recurrence.
- D.2.2 Forwards the completed report to Environmental Services and a copy to Legal Department.

 Retains a copy for future reference.

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



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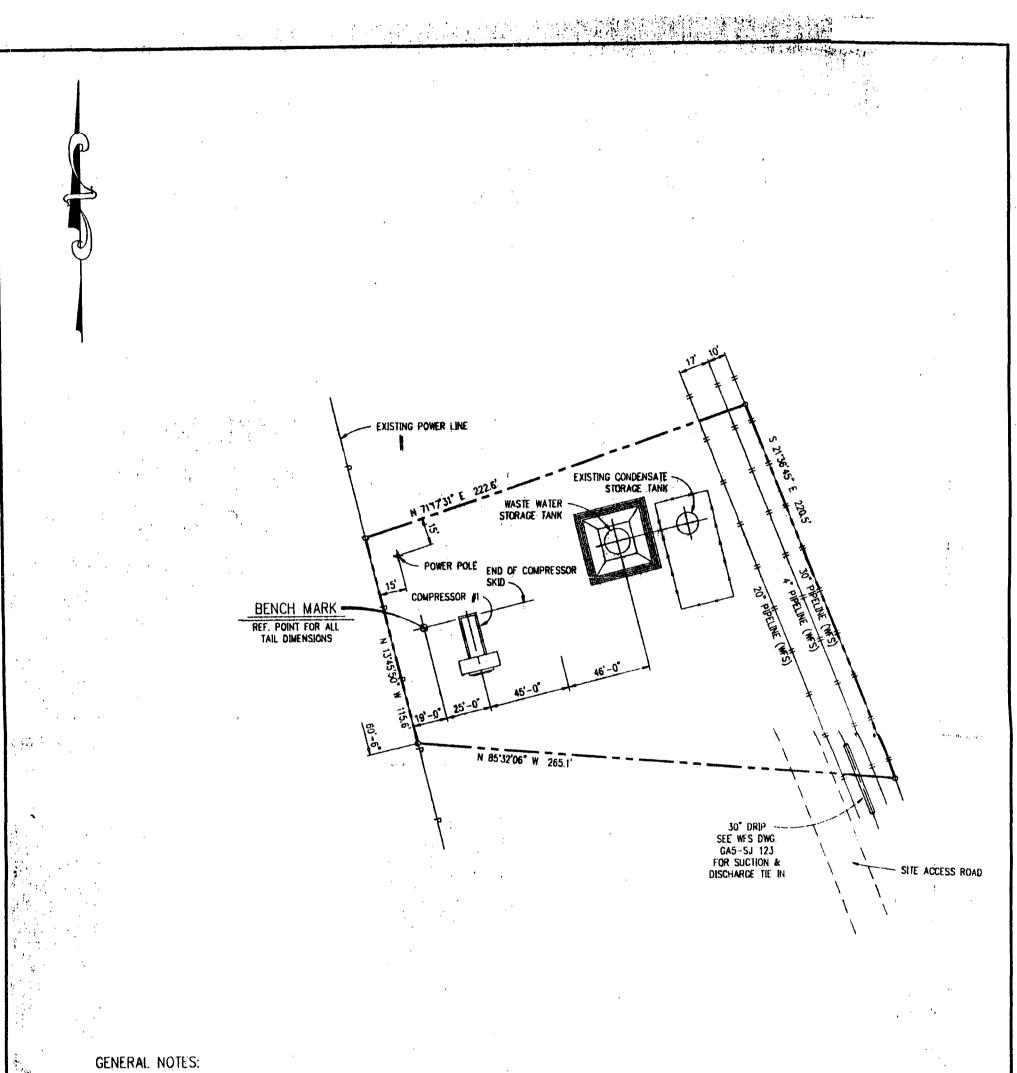
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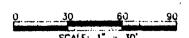
ATTACHMENT A

Discharge or Spill Containment Procedures and Materials

	pe of Facility where the scharge or Spill occurs		Containment Procedures		aterial Used Containment
λ.	Oil Pipeline (as defined in C.1.4)	2.	Closes appropriate block valves. Contains discharge or spill by: ditching covering, applying sorbents, constructing an earthen dam, or burning. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.	2. 3. 4. 5. 6.	Straw Loose Earth Oil Sorbent - 3M Brand Plain Wood Chips Sorb - Oil Chips Banta Co. Sorb - Oil Swabs Banta Co. Sorb - Oil Mats - Banta Co. Or Equivalent Materials.
В.	Vehicle	1.	Contains discharge or spill by: ditching, covering surface with dirt, constructing earthen dams, applying sorbents, or burning	•	
		2.	Notifies immediately the Compliance and Safety Department and if there is any imminent danger to local residents; notifie immediately the highway patrol or local police officials.	8	
		3.	If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.		
			NOTE: Any vehicle carrying any hazardous or toxic substance will carry a show or other ditching device to contain spill. If the vehicle has sufficien room, sorbent materials should also carried.	a t	
c.	Bulk Storage Tanks or any other Facilities	1.	Contains discharge or spill by: ditching, covering, applying sorbents, constructing an earthen dam, or burning.		
		2.	an earthen dam, or burning. If burning is required, obtains approval from the appropriate state air quality control government agencies before burning.		



1. SITE OF APPROX. 30' x 40' TO BE LEVELED AND DEGRUBBED TO A MAXIMUM DEPTH OF 6".





			REVISIONS		8.50	PLOT DATE/TIME 12/	22/18	94 3:41 P.M.	WO. TO. IAM-I-MI
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P.O. Box 58900 Salt Lake City, UT 84158-0900 (801) 584-7033 FAX: (801) 584-6483

November 8, 1994

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

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

Dear Mr. Anderson:

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

1. Navajo C.D.P, San Juan County;

2. Trunk L Compressor Station, Rio Arriba County; and

3. Trunk M Compressor Station, Rio Arriba County.

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

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

Sincerely,

Léigh E. Gooding, P.G. Environmental Specialist

Attachments

cc: M. Hall, 2C2

OCD FILES

35MM DRAWINGS

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