

March 19, 2020

Mr. Scott Ramsey, Chief*
Industrial Section, Industrial/Municipal Branch, Water Division
Alabama Department of Environmental Management
1350 Coliseum Boulevard
Montgomery, AL 36110-2412

2800 Post Oak Boulevard

Houston, TX 77056

Phone (713) 215-4729

Fax (713) 215-2239

Subject:

Williams Mobile Bay Producer Services LLC

NPDES Permit Number AL0072575

Request for Permit Exemption and Current Permit Termination

Dear Mr. Ramsey,

Williams Mobile Bay Producer Services LLC (Williams) operates the Mobile Bay Gas Processing Plant (MBGPP), located at 6000 Rock Road near Coden, Alabama. Williams has an existing NPDES permit from the Alabama Department of Environmental Management (ADEM) that will expire on September 30, 2020. As discussed with you via phone and email recently, Williams is requesting an exemption from stormwater permitting for oil & gas operations, under 40 CFR 122.26(c)(1)(iii) regarding non-discharges of stormwater associated with industrial activity for new or existing facilities. To date, the facility has no findings of spills or effluent limit violations. Also, guidance

Per your request, Williams is requesting the formalization of the exemption determination by ADEM, and subsequent termination of the current NPDES permit. Williams also requests a return reply from ADEM showing concurrence with the exemption and termination of the current permit.

Thank you for your collaboration, guidance and fast responses. Please feel free to contact me, or Mr. Matt Skific of ERM at matt.skific@erm.com or (504) 864-9815.

Sincerely,

Marc Rámos

Supervisor of Operations

CC:

Brian Marshall, ADEM

Dan Lee, Williams Matt Skific, ERM