

GW - 15

WORK PLANS

TRW/MID-GJV-LTR05-99

February 10, 1999

Mr. William C. Olson
State of New Mexico; Energy, Minerals and Natural Resources Department
Oil Conservation Division (OCD)
2040 South Pacheco
Santa Fe, New Mexico 87505

RECEIVED

FEB 12 1999

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Re: Revised Monitoring Plan for Linam Ranch Plant
Lea County, New Mexico

Dear Mr. Olson:

TRW Inc. (TRW) has been retained by GPM Gas Corporation (GPM) to submit this work plan to revise the current monitoring program being conducted at the Linam Ranch Plant in Lea County, New Mexico. This work plan addresses two separate areas within the plant: the EOTT Tanks and the former liquid waste disposal area.

EOTT Tanks

In your letter to Mr. Mel Driver, GPM Environmental Engineer, dated February 3, 1999, you state that "Upon review of the [1998 Annual Monitoring and Sampling Report, GPM - Linam Ranch Natural Gas Plant], the OCD notes that ground water in downgradient monitor well MW-13 has become contaminated with benzene in excess of New Mexico Water Quality Control Commission (WQCC) standards. Since there is no longer a clean downgradient monitor well which can demonstrate containment of the contaminated groundwater plume, the OCD requires that GPM submit a work plan for installation of additional downgradient monitor wells." At this time, GPM respectfully requests not to install additional monitoring wells for the reasons cited below:

1. An existing monitoring well (MW-3) is located on site approximately 1,000 feet downgradient (southeast) of monitoring well MW-13. This well can be included in the monitoring program to demonstrate that the plume has not migrated off site. A site map of Linam Ranch Plant showing the locations of all existing monitoring wells on site is attached (Figure 1).
2. After approximately two years of recording benzene concentrations below 0.001 milligrams per liter (mg/L), benzene levels in MW-13 exceeded the WQCC standard of 0.010 mg/L for the first time during the January 22, 1997 sampling event. However, benzene levels have decreased from the maximum level of 0.132 mg/L on August 15, 1997 to concentrations of 0.082 mg/L and 0.061 mg/L during the January and July 1998 sampling events, respectively. This decline indicates that either natural attenuation processes are successfully reducing benzene levels or that a small, finite slug has passed through the monitoring network. The reduction in benzene concentrations in MW-13 is illustrated in the following graph.

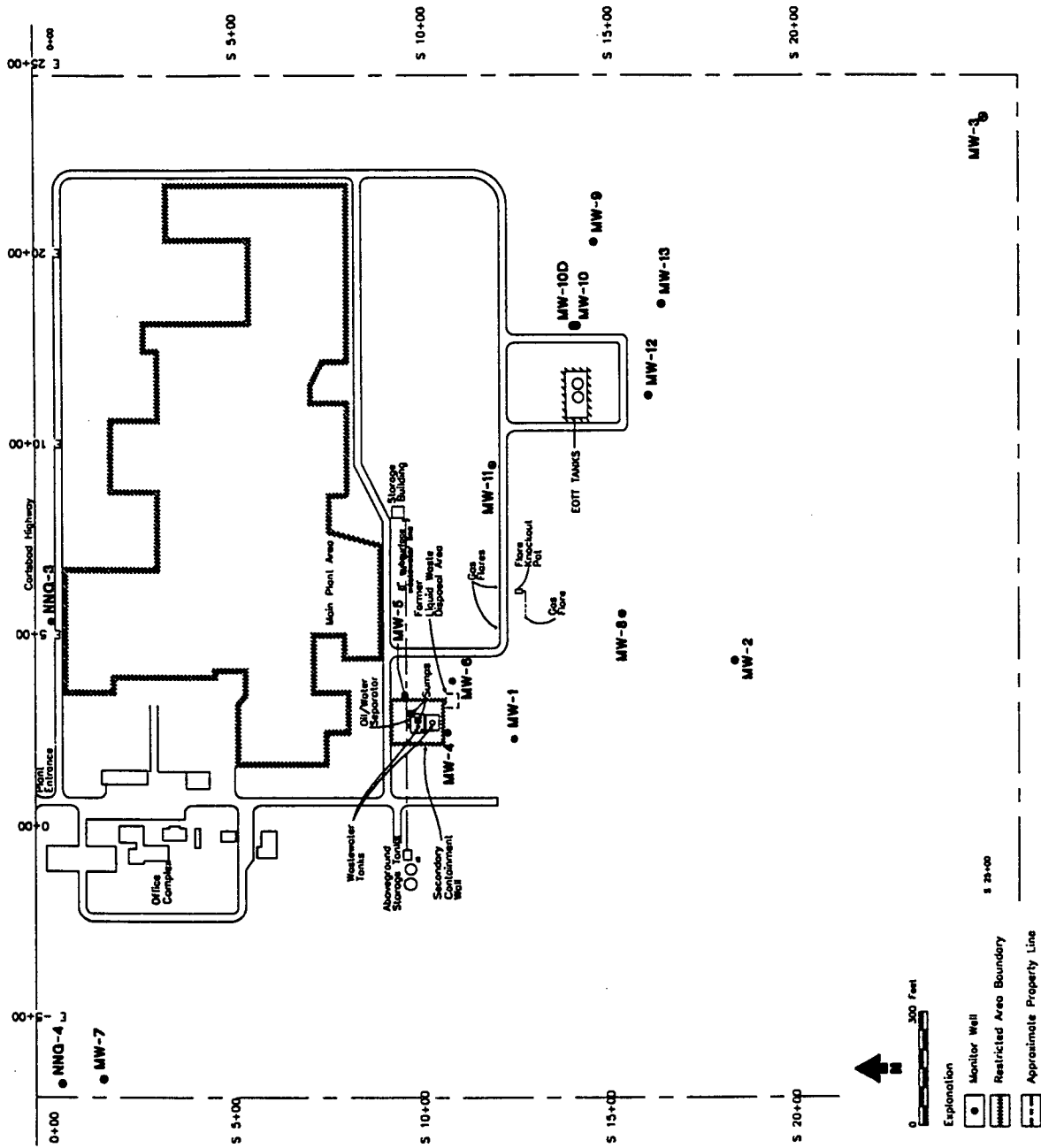
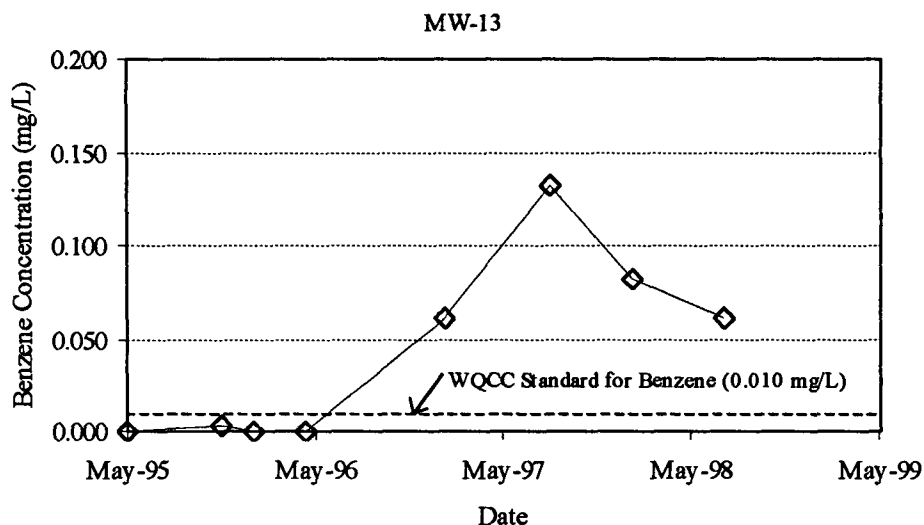


Figure 1
LINAM RANCH PLANT
MONITORING WELL LOCATION MAP

SITE:	GPM - Linam Ranch Plant		
DATE:	2/8/99	FILE NAME:	Site Map 90
AUTHOR:	GJV	DRN BY:	MP
CKD BY:	GJV	SCALE:	1" = 450'



Energy & Environmental Systems



We believe the benzene exceedence in MW-13 is due to a small, finite slug of contaminants, and that further monitoring will again verify that natural attenuation processes are sufficiently containing the plume on site. During each semi-annual sampling event in 1999, monitoring well MW-3 will be sampled in addition to wells MW-9, MW-10, MW-10d, MW-11, MW-12, and MW-13. A summary of historical BTEX concentrations for MW-3 is provided in the following table.

Summary of BTEX Concentrations in MW-3					
Linam Ranch Plant					
Monitoring Well	Sampling Date	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylenes (mg/L)
MW-3	9/30/91 ¹	< 0.001	0.002	< 0.001	< 0.001
	2/4/94 ²	< 0.001	< 0.005	< 0.005	< 0.005
	5/17/95 ³	0.001	< 0.001	< 0.001	0.001
WQCC Standards		0.010	0.75	0.75	0.62
¹ Sampled by Metric Corporation and analysed by Assagai Analytical Labs (Albuquerque, NM) ² Sampled by Geoscience Consultants Ltd and analysed by Core Laboratories (Aurora, CO) ³ Sampled by Geoscience Consultants Ltd and analysed by Trace Analysis Inc. (Lubbock, TX) All samples analyzed for BTEX using EPA Method 8020 except for samples obtained on May 17, 1995 (EPA Method 8240). New Mexico Water Quality Control Commission (WQCC) standards are listed as specified in Section 3-103. Values in boldface type indicate concentrations exceed WQCC groundwater standards					

Former Liquid Waste Disposal Area

Based on results of the previous investigations during Enron's ownership of the gas plant, a dissolved hydrocarbon groundwater plume was identified in the former liquid waste disposal area of the plant. In addition to elevated dissolved hydrocarbons, free product (natural gas liquids) has sometimes been observed in three monitoring wells (MW-4, MW-5, and MW-6) ranging in thickness from less than 0.01 feet to 1.44 feet. Groundwater elevation data and product thickness measurements are summarized in Table 1. A potentiometric surface map showing the most recently available groundwater gradient for this area (May 17, 1995) is included as Figure 2. Since April 1998, TRW has conducted product recovery operations by using a passive bailer in MW-4 and an adsorbant sock in MW-6. As of February 9, 1999, a total of 3.3 gallons of free product has been recovered from these two monitoring wells.

The historical analytical results for monitoring wells MW-1, MW-4, MW-5, MW-6, and MW-8 are listed in Table 2. A BTEX Concentration Map with the most recent analytical results (May 17, 1995) for this area of the plant is included in Figure 3.

Based on the historical analytical results of monitoring wells MW-1, MW-4, MW-5, MW-6, and MW-8, and direction of groundwater flow (southeast), the size of the BTEX plume is estimated to be a maximum of 550 feet long by 300 feet wide (≈ 4 acres). The downgradient edge of the BTEX plume is estimated at approximately 1,400 feet from the southern property boundary of the plant, therefore it does not threaten to migrate off site or to any potential receptors (water wells).

The data collected to date clearly demonstrates that the hydrocarbon-impacted groundwater plume associated with the former liquid waste disposal area is contained well within the fenced plant property. Natural attenuation, volatilization and biodegradation appear to be effective in stabilizing the plume and preventing continued downgradient migration. Thus, only a small portion of the plant site is impacted by hydrocarbons and off-site groundwater (water which may be used in the reasonably foreseeable future) is not threatened. Based on current and future land uses and the lack of potential receptors, there is low risk with respect to exposure to the human health and environment from the hydrocarbon-impacted groundwater and soil in the former liquid waste disposal area.

To address the groundwater quality issues presented above, GPM proposes to expand the sampling and monitoring of the Linam Ranch Plant (EOTT Tanks) to include the liquid waste disposal area. Product recovery, using the passive bailer and adsorbant sock in MW-4 and MW-6, respectively, will be continued on a monthly basis. In addition, monitoring and sampling of the following wells will be included on a semi-annual basis.

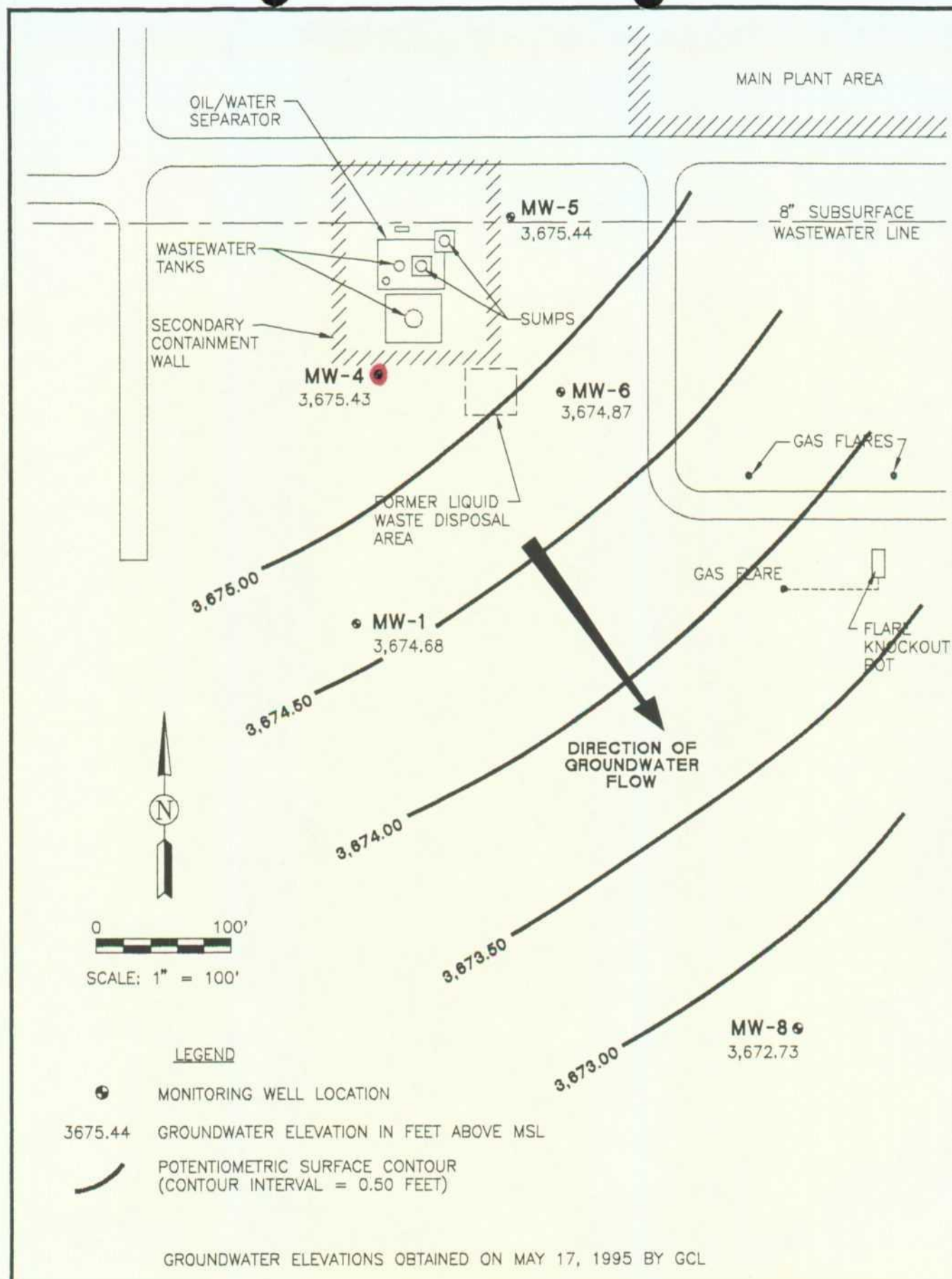
- MW-1 is located approximately 180 feet south-southwest of the source area and is positioned near the leading edge of the plume. BTEX concentrations in MW-1 have been consistently near or below detection limits.
- MW-5 is located approximately 100 ft. north of the source area.
- MW-8 is located approximately 580 feet southeast of the source area and delineates the maximum downgradient extent of the BTEX plume. The dissolved hydrocarbon concentrations for monitoring well MW-8 have consistently been below the laboratory detection limits for each constituent of BTEX.

Table 1
Summary of Groundwater Elevations
Linam Ranch Plant - Liquid Waste Disposal Area

Monitoring Well	Gauging Date	Ground Surface Elevations (feet)	Top of Casing Elevations (feet)	Groundwater Depth Below Top of Casing (feet)	Groundwater Elevation (feet)	PSH Thickness (feet)
MW-1	5/17/95	3718.29	3720.18	45.50	3674.68	0.00
	1/17/96	3718.29	3720.18	43.95	3676.23	0.00
	4/24/96	3718.29	3720.18	44.81	3675.37	0.00
	1/22/97	3718.29	3720.18	45.73	3674.45	0.00
	8/15/97	3718.29	3720.18	45.55	3674.63	0.00
	1/22/98	3718.29	3720.18	45.99	3674.19	0.00
	7/20/98	3718.29	3720.18	46.51	3673.67	0.00
MW-4	5/17/95	3720.46	3722.45	47.20	3675.25	0.22
	11/15/95	3720.46	3722.45	46.71	3675.74	0.01
	1/17/96	3720.46	3722.45	46.18	3676.27	0.00
	4/24/96	3720.46	3722.45	46.95	3675.50	0.00
	1/22/97	3720.46	3722.45	48.19	3674.26	0.04
	8/15/97	3720.46	3722.45	48.55	3673.90	0.27
	1/22/98	3720.46	3722.45	49.11	3673.34	1.44
7/20/98	3720.46	3722.45	48.99	3673.46	0.36	
MW-5	5/17/95	3721.53	3723.60	48.17	3675.43	0.01
	11/15/95	3721.53	3723.60	46.98	3676.62	0.00
	1/17/96	3721.53	3723.60	47.37	3676.23	0.00
	4/24/96	3721.53	3723.60	48.09	3675.51	0.00
	1/22/97	3721.53	3723.60	49.25	3674.35	0.00
	8/15/97	3721.53	3723.60	48.86	3674.74	0.00
	1/22/98	3721.53	3723.60	52.41	3671.19	0.00
7/20/98	3721.53	3723.60	49.39	3674.21	0.00	
MW-6	5/17/95	3720.99	3723.08	48.25	3674.83	0.05
	11/15/95	3720.99	3723.08	46.29	3676.79	0.01
	1/17/96	3720.99	3723.08	46.90	3676.18	0.00
	4/24/96	3720.99	3723.08	46.72	3676.36	0.01
	1/22/97	3720.99	3723.08	48.89	3674.19	0.02
	8/15/97	3720.99	3723.08	49.21	3673.87	0.05
	1/22/98	3720.99	3723.08	48.91	3674.17	0.05
7/20/98	3720.99	3723.08	49.56	3673.52	0.08	
MW-8	5/17/95	3714.18	3716.18	43.45	3672.73	0.00
	1/17/96	3714.18	3716.18	41.71	3674.47	0.00
	4/24/96	3714.18	3716.18	42.82	3673.36	0.00
	1/22/97	3714.18	3716.18	43.40	3672.78	0.00
	8/15/97	3714.18	3716.18	44.14	3672.04	0.00
	1/22/98	3714.18	3716.18	44.31	3671.87	0.00
7/20/98	3714.18	3716.18	44.57	3671.61	0.00	

* Elevations surveyed by John W. West Engineering Company of Hobbs, NM.

The monitoring well casings were marked on the north side to provide consistent reference points for future gauging operations. Groundwater direction is to the southeast with a hydraulic gradient of approximately 0.002 feet/foot.



GCL



CLIENT: GPM - LINAM RANCH PLANT	
DATE: 5/17/95	REV. NO.: 0
AUTHOR: GJV	DRAWN BY: MP
CK'D BY: RTH	FILE: LCATMAP1

**FIGURE 2
POTENTIOMETRIC SURFACE
MAP**

Table 2
Summary of Dissolved BTEX Concentrations
Linam Ranch Plant - Liquid Waste Disposal Area

Monitoring Well	Sampling Date	Source ¹	Lab ²	Benzene (mg/L)	Toluene (mg/L)	Ethylbenzene (mg/L)	Xylenes (mg/L)
MW-1	09-??91	Metric	AAL	0.0053	0.0067	0.001	NA
	11/3/92	IT	ITAS	0.0015	0.0015	ND	0.010
	12/2/92	IT	ITAS	0.0013	0.0014	ND	0.006
	1/12/94	DBS&A	ATI	0.0039	ND	0.0021	0.002
	5/17/95	GCL	TAI	<0.002	<0.002	<0.002	<0.002
MW-4	11/3/92	IT	ITAS	16.0	8.0	0.7	1.8
	12/2/92	IT	ITAS	17.0	8.2	0.53	1.3
	1/10/94	DBS&A	ATI	18.0	10.0	0.5	1.3
	5/17/95	GCL	TAI	20.9	1.35	<0.2	11.4
MW-5	11/3/92	IT	ITAS	0.003	0.0034	0.003	0.034
	12/2/92	IT	ITAS	0.0091	0.0041	0.0082	0.037
	1/10/94	DBS&A	ATI	0.300	0.190	0.160	0.490
	5/17/95	GCL	TAI	0.090	0.014	0.138	0.831
MW-6	11/3/92	IT	ITAS	0.340	0.023	0.051	0.120
	12/2/92	IT	ITAS	0.520	0.020	0.058	0.120
	1/10/94	DBS&A	ATI	0.770	0.0029	0.096	0.210
	5/17/95	GCL	TAI	0.980	0.007	0.087	0.181
MW-8	2/9/94	GCL	CL	< 0.001	< 0.005	< 0.005	< 0.005
	5/17/95	GCL	TAI	< 0.001	< 0.001	< 0.001	< 0.001
WQCC Standards				0.010	0.75	0.75	0.62

1 Source refers to the environmental consultant which obtained the groundwater samples:

(Metric, IT=IT Corporation, DBS&A=Daniel B. Stephens & Associates, GCL=Geoscience Consultants Limited)

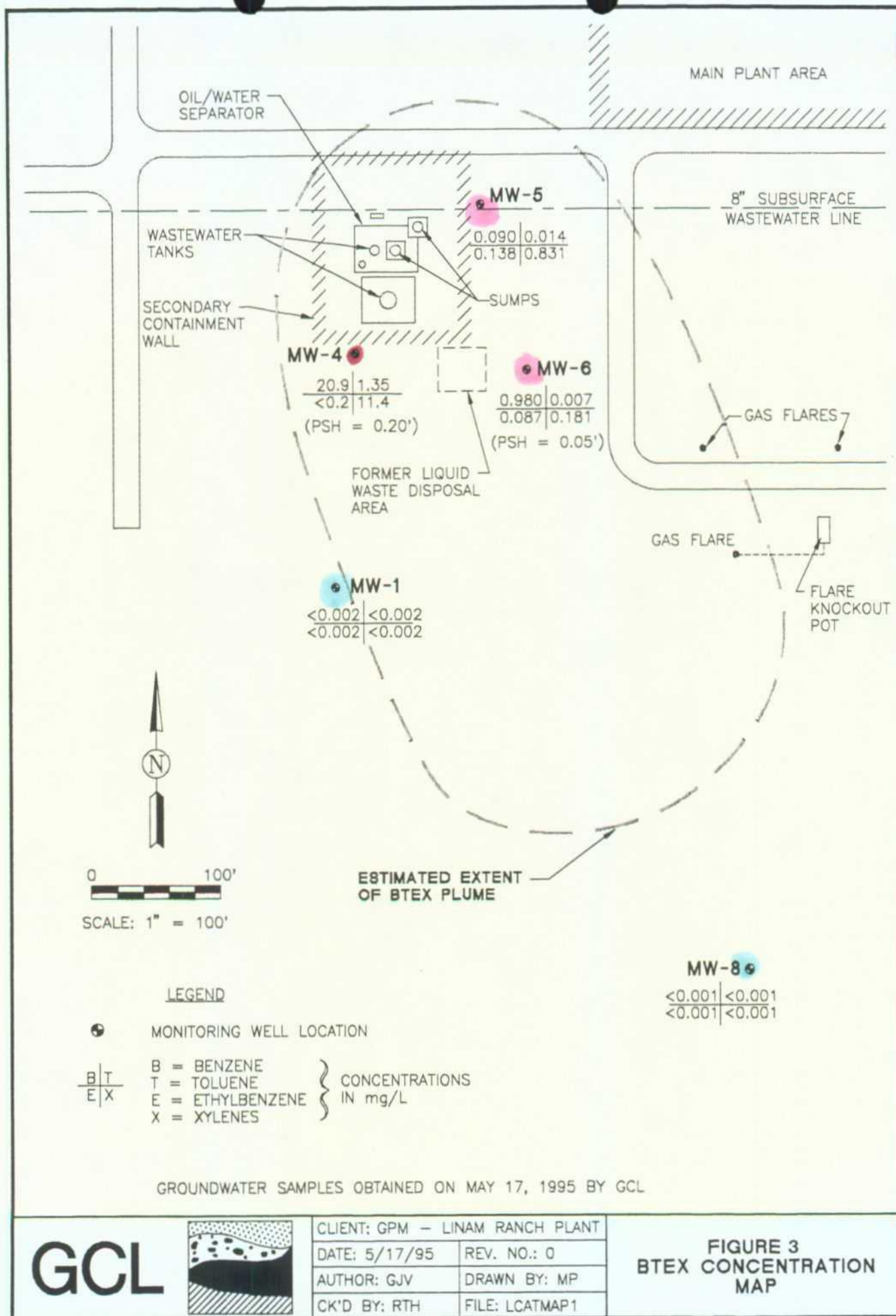
2 Lab refers to the laboratory which conducted the organic analyses:

(AAL=Assaigai Analytical Laboratories, ITAS=IT Analytical Services, ATI=Analytical Technologies, Inc., and TAI=Trace Analysis Inc.)

ND indicates concentration was below laboratory detection limits; NA indicates sample was not analyzed for this constituent.

New Mexico Water Quality Control Commission (WQCC) standards are listed as specified in Section 3-103.

Values in boldface type indicate concentrations exceed WQCC groundwater standards



GCL



CLIENT: GPM - LINAM RANCH PLANT

DATE: 5/17/95

REV. NO.: 0

AUTHOR: GJV

DRAWN BY: MP

CK'D BY: RTH

FILE: LCATMAP1

**FIGURE 3
BTEX CONCENTRATION
MAP**



Mr. William C. Olson
February 10, 1999
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With the concurrence of the OCD, GPM will proceed as outlined above. If requested, a semi-annual monitoring report will be submitted to the OCD Santa Fe and Hobbs district offices. At that time, GPM will request the OCD to reassess whether an additional monitoring well is required.

Please feel free to call me at (915) 682-0008 or Mel Driver at (915) 620-4142 if you have any other questions.

Sincerely



Gilbert J. Van Deventer, REM
Project Manager

Attachments

cc: Mel Driver - GPM, Midland, TX

GPM\LINAM\LINAM-WKPLN.DOC

February 2, 1994

Mr. Roger Anderson
New Mexico Oil Conservation Division
PO Box 2088
Santa Fe, New Mexico 87504-2088

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FEB 03 1994

OIL CONSERVATION DIV.
SANTA FE

RE: HOBBS NATURAL GAS PROCESSING PLANT

Dear Roger:

On behalf of Enron, H⁺GCL is pleased to submit this work plan. As you are aware from the Metric and IT reports previously submitted to NMOCD on the above-referenced facility, localized contamination of groundwater has been identified. Recently, D.B. Stephens conducted an investigation to determine the extent of this petroleum hydrocarbon impact to groundwater. On February 5, 1994, we plan to install one groundwater monitor well and two temporary wells to confirm this initial study and to provide baseline groundwater quality data on the plant as a whole.

MW-8 is proposed at a location down-gradient from the benzene contamination documented in previous studies and in the preliminary data available through the D.B. Stephens investigation (see attached figure). The exact location will be determined after D.B. Stephens completes a draft groundwater elevation map for the area of concern. We will drill the proposed temporary wells first and stake the location for this well in the field.

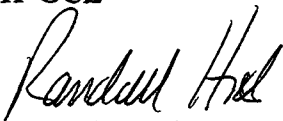
A location south of the plant operation room is proposed for a temporary well. Another temporary well is proposed at the southeast corner of the plant area, near the liquid loading tanks. At present, no groundwater data are available immediately down-gradient of the plant site, therefore baseline groundwater quality data are not available for the main plant area. The recent site inspections performed by H⁺GCL and NMOCD indicate that the plant is presently operated in an environmentally sound manner and present practices would not create a groundwater contamination problem. It is also true that reports on substantial releases or discharges were not uncovered by our research at the site. We anticipate that these temporary wells will not discover groundwater contamination.

The investigation conducted by D.B. Stephens showed elevated TPH concentrations in the area of the "Buffalo Wallow." BTEX constituents were not observed. As a result of these results, we do not believe that a materially significant contamination problem exists in this area. However, the wells that show high TPH will be sampled and analyzed for semi-volatile organic compounds. TPH is not a constituent that is regulated by the Water Quality Control Commission Regulations but is an "indicator parameter." In this case, the analyses may indicate that polynuclear aromatic hydrocarbons may exist in groundwater. We do not believe that these compounds will be present in sufficient concentration to require installation of a remedy. But we can only prove this hypothesis by sampling and analysis. Therefore, we also propose to collect samples from these wells and analyze the samples for PAHs (semi-volatile organic compounds).

Mr. Roger Anderson
February 2, 1994
Page 2

We will implement this program Saturday, February 5, 1994. We apologize for the short notice, but we hope the simplicity of this approach will permit rapid review of this work plan. We appreciate your verbal comments regarding our approach. A final letter report that presents all data regarding the environmental investigations involving these tanks and our recommendations for mitigating any contamination will be forwarded to NMOCD after we evaluate the new data.

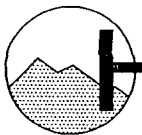
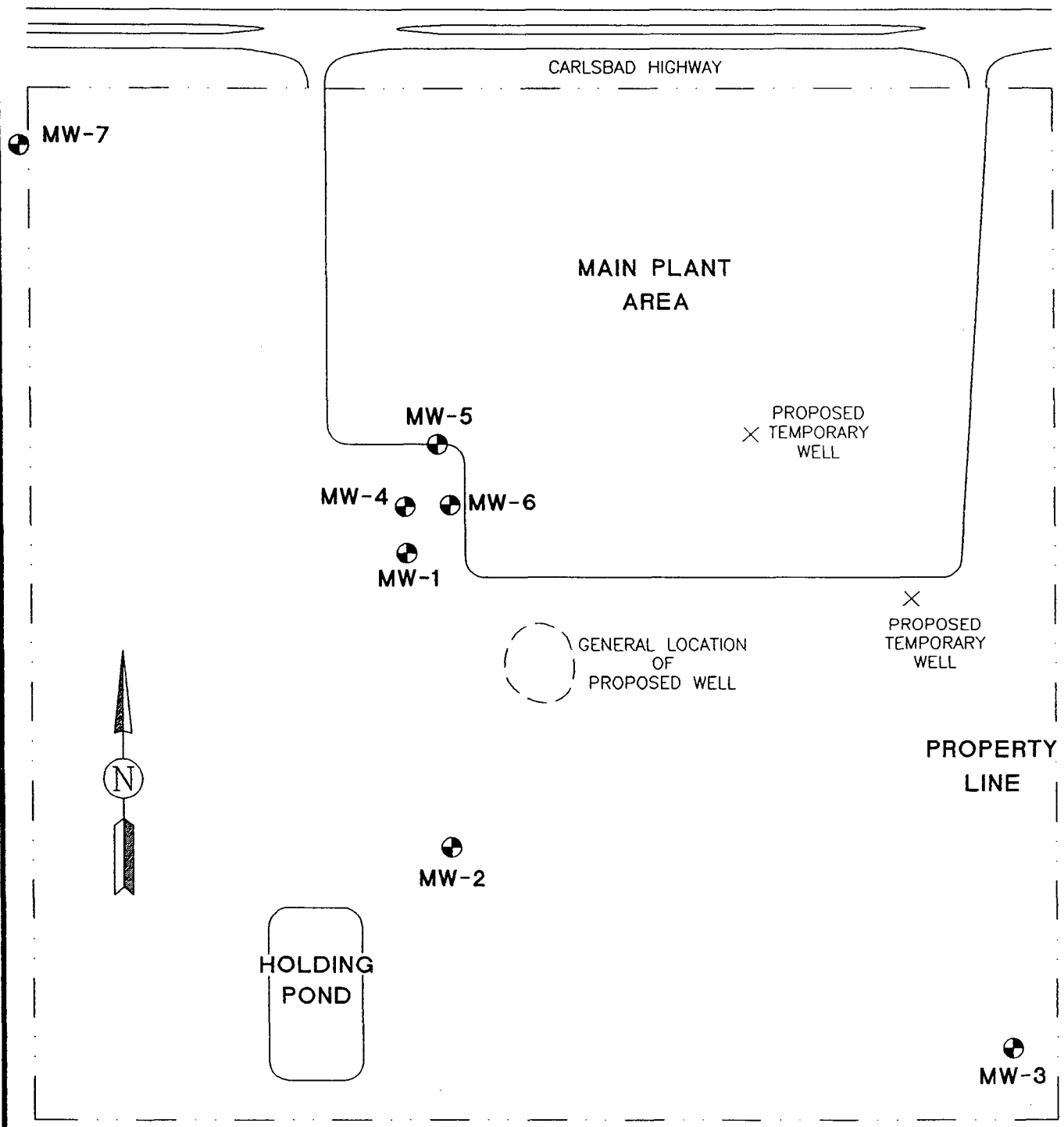
Sincerely,
H+GCL



Randall T. Hicks, CPG
Vice President

/54191/ANDER01.LTR

cc: Mark Neese, Enron Hobbs
Bill Kendrick, Enron Houston



H⁺GCL

CLIENT: ENRON

DATE: 2/1/94

AUTHOR: M.P.

CK'D BY: R.H.

REV. NO.: 0

DRAWN BY: HCC

FILE: GASPLANT

**HOBBS PLANT
MONITOR WELL
LOCATION MAP**



GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

February 23, 1995

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FEB 25 1995

Environmental Bureau
Oil Conservation Division

Mr. William C. Olson - Hydrogeologist
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division - Environmental Bureau
2040 South Pacheco
Santa Fe, New Mexico 87502

**RE: Subsurface Investigation Workplan for the
Linam Ranch Plant (Formerly ENRON Hobbs Plant) and the
Monument Booster Station (Formerly ENRON Hobbs Gas Compressor Station #2,
Lea County, New Mexico**

Dear Mr. Olson:

The following is a workplan for a subsurface soil and groundwater investigation related to the Linam Ranch Plant (formerly the ENRON Hobbs Gas Plant) and the Monument Booster Station (formerly ENRON Hobbs Compressor Station #2) located in Lea County, New Mexico. Previously, these facilities were owned and operated by Enron Oil and Gas Company (ENRON) however, GPM Gas Corporation (GPM) acquired ownership of the facilities in December 1994. The subsurface investigation workplan described herein specifically addresses item numbers 5 and 6 in your letter to ENRON dated October 7, 1994. Item number 1 requests a copy of the report which describes previous work performed by Geoscience Consultants, Ltd. (GCL) at these facilities. A copy of the GCL report entitled Evaluation of Technologies to Address Groundwater Contamination at the Hobbs Gas Plant and Hobbs Compressor Station No. 2 (dated March 9, 1994) is included with this workplan. The purpose of the subsurface soil and groundwater investigation described herein is to define the horizontal and vertical extent of hydrocarbon-impacted groundwater conditions at the facilities referenced above to the extent necessary for the development of a suitable remedial response (eg. no action, monitoring, air sparging, etc.). We will install a permanent groundwater monitoring well network at the Linam Ranch Plant as requested by the NMOCD.

Linam Ranch Plant

Based on groundwater analytical data from one temporary drive point well (DP-1) conducted by GCL in February 1994 and the results of a limited subsurface investigation conducted by Daniel B. Stevens (DBS&A) in May 1994 which included seven temporary drive point wells (EOTT-1 through EOTT-5, EOTT-7, and EOTT-8) and one permanent monitor well (MW-9, EOTT-6) the hydrocarbon-impacted water in the area of the EOTT tanks appears to be fully delineated horizontally however, the installation of five monitor wells is necessary to provide a permanent monitoring well network. The existing monitor well (MW-9) adequately defines the downgradient extent of BTEX impact.

As indicated on the attached site map, two permanent monitor wells (MW-10 and MW-10D) located in the vicinity of EOTT-5 shall be installed to determine the magnitude and vertical extent of hydrocarbon-impact to the on-site groundwater conditions in relation to the EOTT tanks. Two soil borings, SB-1 and SB-2, will be performed adjacent to the south and west sides of the EOTT tanks to better determine the magnitude of soil impact from the suspected source area. Based on the results of these soil borings, it may be more appropriate to place MW-10 and MW-10D at one of these locations since the intent is to place this well within the center of mass of the hydrocarbon-impacted groundwater. Monitor well MW-10D will be completed deeper with the well screening installed approximately 15 to 20 feet below the water table. Monitor well MW-10D shall be constructed of 2-inch diameter well casing and screen to maximize its potential use as an air sparging well if such corrective action is deemed appropriate. The additional proposed monitor wells shall be constructed of 4-inch diameter PVC to minimize potential completion and groundwater sampling difficulties. One on-site monitor well (MW-13) placed approximately 150 to 200 feet in the apparent upgradient direction (northwest) of the EOTT tanks should define the upgradient extent of hydrocarbon impact. Two monitor wells, MW-12 and MW-13, should be placed approximately 200 feet southeast and 250 northeast of the EOTT tanks, respectively, to define the cross-gradient extent of hydrocarbon impact to groundwater conditions and to provide the necessary lateral monitoring points such that the actual groundwater gradient direction on-site can be determined. Additional monitor wells may be required at this site, depending on the groundwater chemistry results obtained from the proposed wells.

Monument Booster Station

We understand that two underground storage tanks (USTs) containing waste oil were excavated and removed from this facility and one above-ground storage tank (AST) containing natural gas/pipeline liquids (condensate) was removed. Hydrocarbon-impacted soil associated with the USTs and from possible AST overflows were excavated in July 1992. Based on groundwater analytical data from two existing monitor wells (MW-1 and MW-2) installed by GCL in February 1994 and the results of a limited subsurface investigation conducted by Daniel B. Stevens (DBS&A) in May 1994 which included six temporary drive point wells, the installation of four additional monitor wells is proposed to define the horizontal and vertical extent of the hydrocarbon-impacted groundwater conditions. Monitor well MW-1 appears to define the magnitude of BTEX observed in the on-site groundwater whereas monitor well MW-2 defines the upgradient extent of BTEX impact.

As indicated on the attached site map, an additional deeper monitor well (MW-1D) located adjacent to MW-1 that is screened approximately 15 to 20 feet below the water table should define the vertical extent of hydrocarbon conditions in the on-site groundwater. This well shall be constructed of 2-inch diameter well casing/screen to maximize its potential use as an air sparging well if such corrective action is deemed appropriate. The three additional proposed monitor wells shall be constructed of 4-inch diameter PVC to minimize potential completion and groundwater sampling difficulties. If off-site access can be secured from the current landowner, one off-site monitor well (MW-5) will be placed approximately 500 feet in the apparent downgradient direction (southeast) of monitor well MW-1. If this well indicates low BTEX concentrations, it should be sufficient to define the downgradient extent of hydrocarbon impact. Two monitor wells, MW-3 (on-site) and MW-4 (off-site) shall be placed approximately 200 feet southwest and 300 east-northeast of MW-1, respectively, to define the cross-gradient extent of hydrocarbon impact to

Mr. William C. Olson
February 23, 1995
Page 3

groundwater conditions and to provide the necessary lateral monitoring points such that the actual groundwater gradient direction on-site can be determined. Again, off-site access must be secured from the current landowner, for the second off-site monitor well. Additional monitor wells may be required at this site, depending on the groundwater chemistry results obtained from the proposed wells.

Sampling and Analysis Procedures

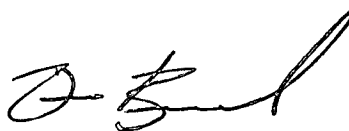
During the performance of advancing soil borings at the above-proposed monitor well locations soil samples will be obtained at 5-foot intervals and screened with a photoionization detector (PID) capable of measuring relative concentrations of volatile organic vapors. For each soil boring and monitor well, the soil sample with the highest PID reading and the sample immediately above the saturated zone shall be submitted for laboratory analysis.

Soil and groundwater samples from the existing and proposed monitor wells will be analyzed for total dissolved BTEX, total petroleum hydrocarbons (TPH), and polynuclear aromatic hydrocarbons (PAH) using EPA Methods 8020, 8015, and 8310, respectively. Field measurements of depth to water, specific conductance, dissolved oxygen, pH and temperature will also be obtained. GCL personnel shall use EPA-approved methods to construct the monitor wells and obtain representative soil and groundwater samples.

Schedule

We will pursue implementation of the scope of work described above within 30 days of your approval of this workplan. If you have any questions or concerns with our proposal, please advise. I can be reached at (915) 368-1085.

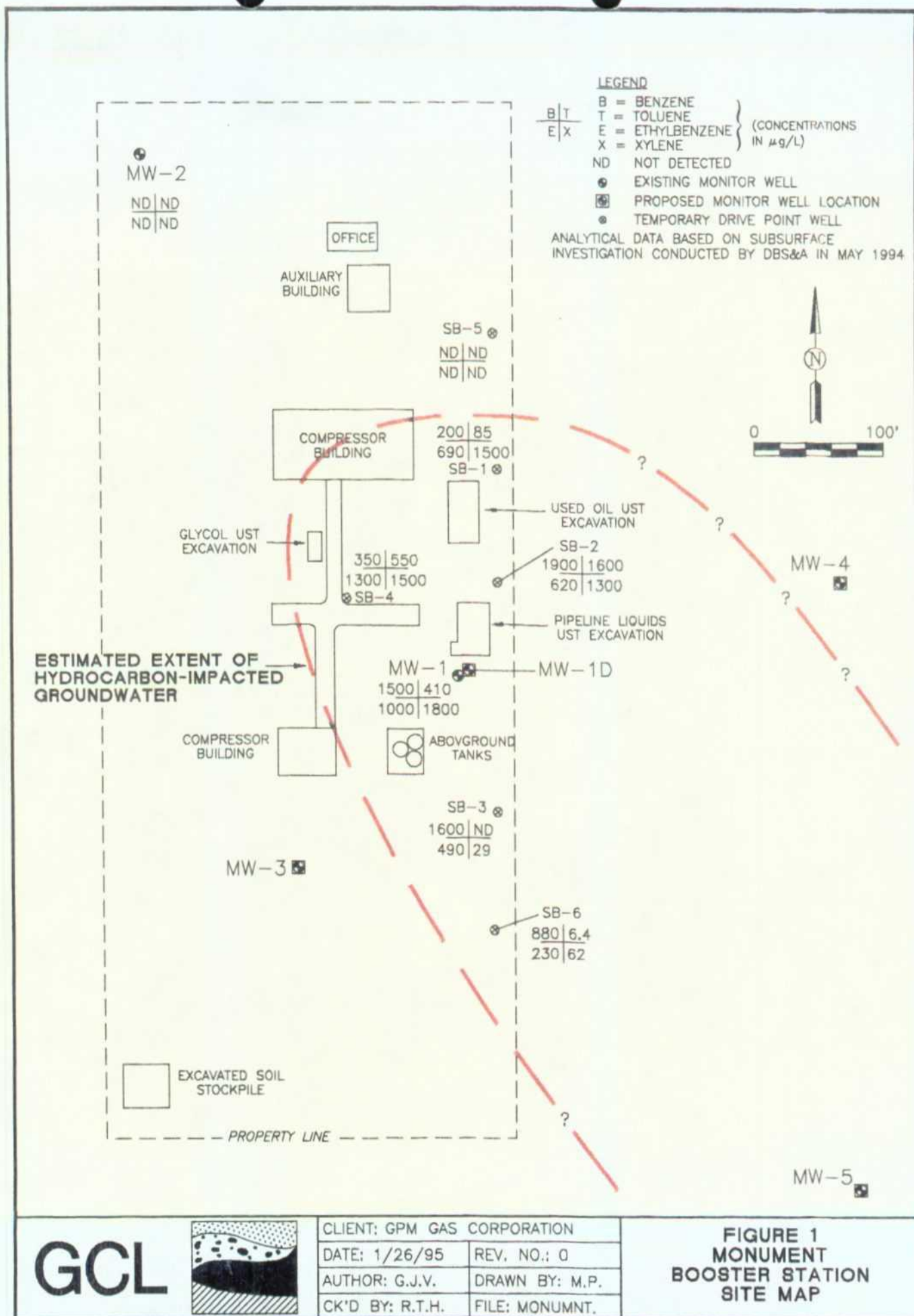
Sincerely,



Vince Bernard
Safety & Environmental Director
New Mexico Region

VBB:mdp
Attachments

cc: Scott Seeby, GPM
Randall T. Hicks, GCL
Gilbert J. Van Deventer, GCL
Maureen Gannon, GCL



GCL



CLIENT: GPM GAS CORPORATION

DATE: 1/26/95

REV. NO.: 0

AUTHOR: G.J.V.

DRAWN BY: M.P.

CK'D BY: R.T.H.

FILE: MONUMNT.

**FIGURE 1
MONUMENT
BOOSTER STATION
SITE MAP**

DP-2

ND | ND
ND | ND

ESTIMATED EXTENT OF
HYDROCARBON-IMPACTED
GROUNDWATER

MW-13

EOTT-8
ND | ND
ND | ND

MW-11

EOTT-7
1500 | 2.7
ND | 55

ASTs

CONTAINMENT
WALL



MW-10

EOTT-5
4800 | 6700
1400 | 1800

MW-10D

DP-1
3300 | ND
ND | 6

EOTT-3
2200 | 12
680 | 240

MW-9
ND | ND
ND | ND

EOTT-2
ND | ND
ND | 5.2

MW-12

EOTT-4
ND | ND
ND | ND

EOTT-1
ND | ND
ND | ND

LEGEND

B = BENZENE
T = TOLUENE
E = ETHYLBENZENE
X = XYLENE
(CONCENTRATIONS IN µg/L)

ND NOT DETECTED

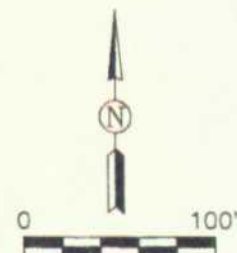
EXISTING MONITOR WELL LOCATION

TEMPORARY DRIVE POINT WELL
(GCL 1994)

PROPOSED SOIL BORING LOCATION

PROPOSED MONITOR WELL LOCATION

B | T
E | X



ANALYTICAL DATA BASED ON SUBSURFACE INVESTIGATION CONDUCTED BY DBS&A IN MAY 1994

GCL



CLIENT: GPM GAS CORPORATION

DATE: 1/26/95

REV. NO.: 0

AUTHOR: G.J.V.

DRAWN BY: M.P.

CK'D BY: R.T.H.

FILE: LNMRNCH

FIGURE 1
LINAM RANCH PLANT
SITE MAP