

1R - 156

APPROVALS

YEAR(S):

1998 - 1995



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

March 25, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-247

Mr. Mel Driver
GPM Gas Services Company
4044 Penbrook
Odessa, Texas 79762

**RE: ANNUAL REPORT
MONUMENT BOOSTER STATION**

Dear Mr. Driver:

The New Mexico Oil Conservation Division has reviewed GPM Gas Services Company's (GPM) December 11, 1997 correspondence and December 1, 1997 "1997 ANNUAL GROUNDWATER MONITORING AND SAMPLING REPORT, GPM - MONUMENT BOOSTER STATION, LEA COUNTY, NEW MEXICO". These documents contain the results of GPM's 1997 ground water remediation and monitoring program at GPM's Monument Booster Station. The documents also recommend eliminating WQCC metals and major cations and anions from the ground water monitoring program with the exception of manganese, chloride, sulfate, nitrate, fluoride and TDS.

The OCD **approves** of the above referenced recommendations with the following conditions:

1. The ground water metals analyses will also include analysis for concentrations of aluminum, arsenic, boron, chromium and iron.

Please be advised that OCD approval does not relieve GPM of liability if the proposed plan fails to adequately monitor contamination resulting from GPM's activities, or if contamination exists which is outside the scope of the plan. In addition, OCD approval does not relieve GPM of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Olson".

William C. Olson
Hydrologist
Environmental Bureau

xc: Wayne Price, OCD Hobbs District Office



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

January 31, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-269-269-245

Mr. Scott Seeby
GPM Gas Corporation
4044 Penbrook
Odessa, TX 79762

**RE: GROUND WATER MONITORING MODIFICATIONS
MONUMENT BOOSTER STATION**

Dear Mr. Seeby:

The New Mexico Oil Conservation Division (OCD) has completed a review of GPM Gas Corporation's (GPM) September 21, 1996 "SECOND QUARTER 1996 SAMPLING EVENT - ANNUAL REPORT, MONUMENT BOOSTER STATION, LEA COUNTY, NEW MEXICO". This document contains the results of GPM's ground water remediation and monitoring activities at the Monument Booster Station. The document also contains a request to change the sampling frequency from quarterly to semi-annual and to submit monitoring data on an annual basis.

The above request to modify the monitoring program is approved with the following conditions:

1. GPM will sample and analyze ground water from all monitor wells on a semi-annual basis for benzene, toluene, ethylbenzene, xylene (BTEX), dissolved oxygen, nitrate, sulfate, total aerobic heterotrophic plate count and total hydrocarbon utilizing bacteria using EPA approved methods.
2. GPM will sample and analyze ground water from all monitor wells on an annual basis for New Mexico Water Quality Control Commission (WQCC) metals using EPA approved methods.
3. The annual report will be submitted to the OCD by August 1 of each respective year. The annual report will contain:
 - a. A description of all activities which occurred during the past calendar year, including conclusions and recommendations.

Mr. Scott Seeby
January 31, 1997
Page 2

- b. A summary of the quarterly laboratory analytic results of water quality sampling of the monitor wells as well as the copies of the laboratory analyses and associated quality assurance quality control data. The results for each monitor well will be presented in tabular form and will show all past and present sampling results.
 - c. A semi-annual water table elevation map using the water table elevation of the ground water in all monitor wells.
 - d. If free phase product is present, a product thickness map.
 - e. Plots of concentration vs. time for relevant contaminants at each monitoring point (ie. benzene, etc.).
 - f. Plots of water table elevation vs. time for each monitoring point.
3. GPM will notify the OCD at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.
4. All original documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

Please be advised that OCD approval does not relieve GPM of liability should contamination exist which is outside the scope of work plan, or if the proposed remedial action plan fails to adequately remediate or monitor contamination at the site. In addition, OCD approval does not relieve GPM of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office
Gil Van Deventer, BDM International, Inc.

P 269 269 245

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PS Form 3800, April 1995

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. Pacheco
Santa Fe, New Mexico 87505

October 25, 1995

CERTIFIED MAIL

RETURN RECEIPT NO. Z-765-962-435

Mr. Vince Bernard
GPM Gas Services Company
4044 Penbrook
Odessa, TX 79762

**RE: GROUND WATER REMEDIATION/MONITORING PLAN
MONUMENT BOOSTER STATION**

Dear Mr. Bernard:

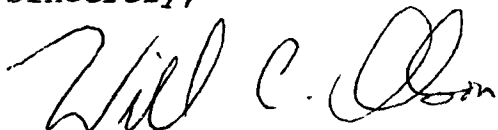
The New Mexico Oil Conservation Division (OCD) has completed a review of GPM Gas Services Company's (GPM) September 29, 1995 "REMEDIATION AND MONITORING WORKPLAN FOR THE MONUMENT BOOSTER STATION, LEA COUNTY, NEW MEXICO". This document contains GPM's work plan for an additional monitor well, a new recovery well and installation of a product recovery system at the Monument Booster Station.

The above referenced remediation and monitoring work plan is approved.

Please be advised that OCD approval does not relieve GPM of liability should contamination exist which is outside the scope of work plan, or if the proposed remedial action plan fails to adequately remediate contamination at the site. In addition, OCD approval does not relieve GPM of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office

Z 765 962 435



**Receipt for
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PS Form 3800, March 1993

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STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

April 5, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-238

Mr. Vince Bernard
GPM Gas Services Company
4044 Penbrook
Odessa, TX 79762

**RE: GROUND WATER INVESTIGATION WORK PLAN
LINAM RANCH GAS PLANT & MONUMENT BOOSTER STATION**

Dear Mr. Bernard:

The New Mexico Oil Conservation Division (OCD) has completed a review of GPM Gas Services Company's February 23, 1995 "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". This document contains GPM's work plan for investigation of the extent of ground water contamination at the Linam Ranch Gas Plant and the Monument Booster Station.

The above work plan is approved with the following conditions:

1. At the Monument Booster Station, an additional monitor well will be installed in the southeast corner of the property line (see attached map of the facility).
2. At the Linam Ranch Plant, monitor wells MW-12 and MW-13 will be installed at the locations show on the attached facility map.
3. All monitor wells will be constructed with a minimum of 10 feet of well screen below the water table and 5 feet of well screen above the water table.
4. GPM will sample ground water from all monitor wells at each facility. Ground water from these monitor wells will be sampled and analyzed for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX), chlorinated organics, major cations and anions, heavy metals and polynuclear aromatic hydrocarbons (PAH's) using EPA approved methods.

GPM can omit sampling ground water from individual, pre-existing monitor well for major cations and anions and heavy metals if prior sampling has shown that the concentrations of these constituents do not exceed New Mexico Water Quality Control Commission (WQCC) ground water standards. GPM can also omit sampling an individual, pre-existing monitor well for chlorinated organics and PAH's, if,

Mr. Vince Bernard
April 5, 1995
Page 2

they have not been detected in a prior sampling.


NOTE: Since there is no WQCC ground water standard for total petroleum hydrocarbons (TPH), the OCD does not require that GPM analyze ground water samples for TPH.

5. GPM will submit a report on the investigation to the OCD by July 31, 1995. The report will contain:
 - a. A description of all activities which occurred during the investigation, conclusions and recommendations.
 - b. A summary of the laboratory analytic results of water quality sampling of the monitor wells. If constituents have been omitted from monitor well sampling, the past sampling event will be referenced.
 - c. A water table elevation map using the water table elevation of the ground water in all monitor wells.
 - d. If free phase product is present, a product thickness map.
 - e. Geologic logs and well completion diagrams for each well.
6. GPM will notify the OCD at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and or split samples.
7. All original documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

Please be advised that OCD approval does not relieve GPM of liability should the investigation activities fail to adequately determine the extent of contamination related to GPM's activities. In addition, OCD approval does not relieve GPM of responsibility for compliance with any other federal, state or local laws and/or regulations.

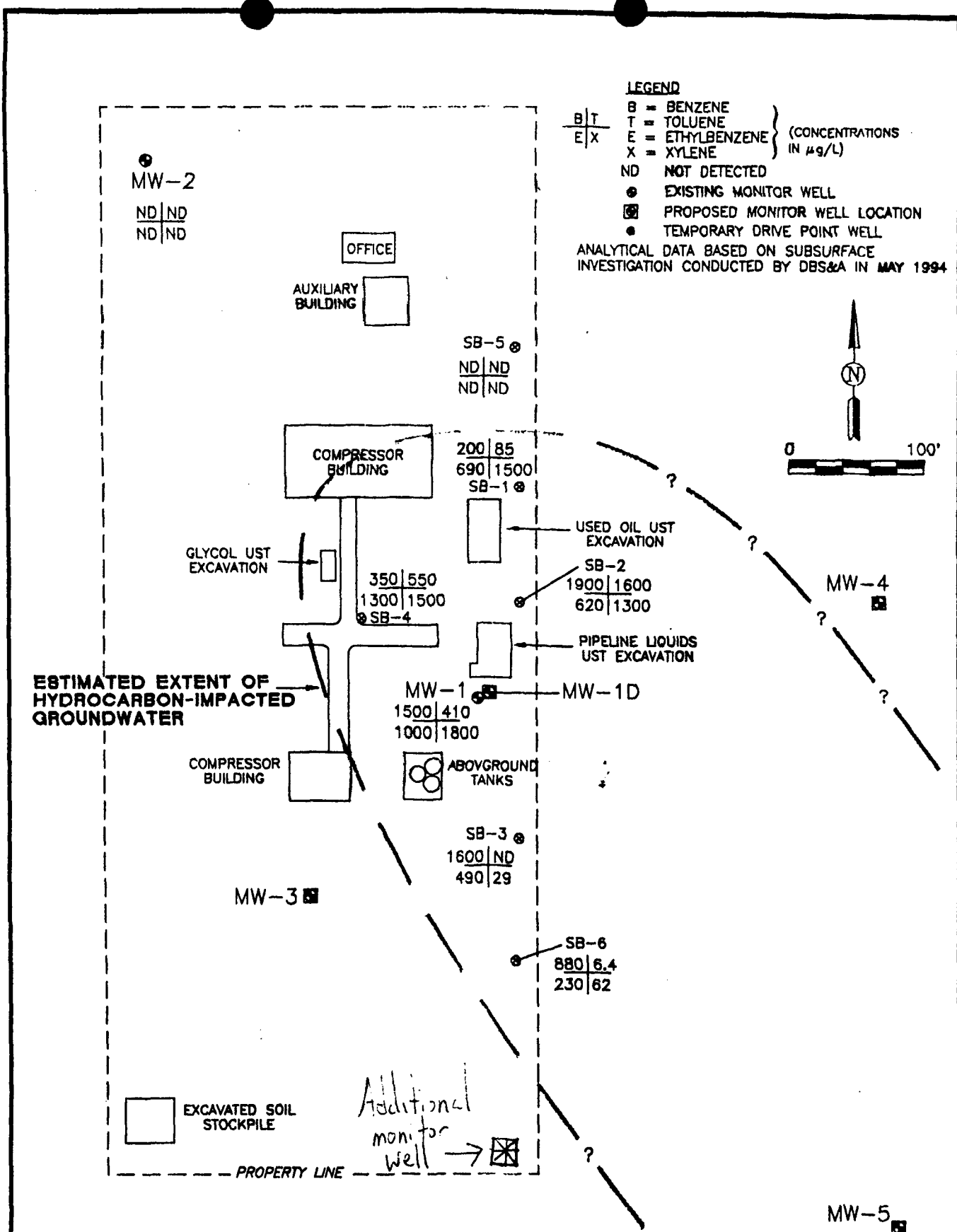
If you have any questions, please call me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office
Gil Vandeventer, GCL



GCL



CLIENT: GPM GAS CORPORATION

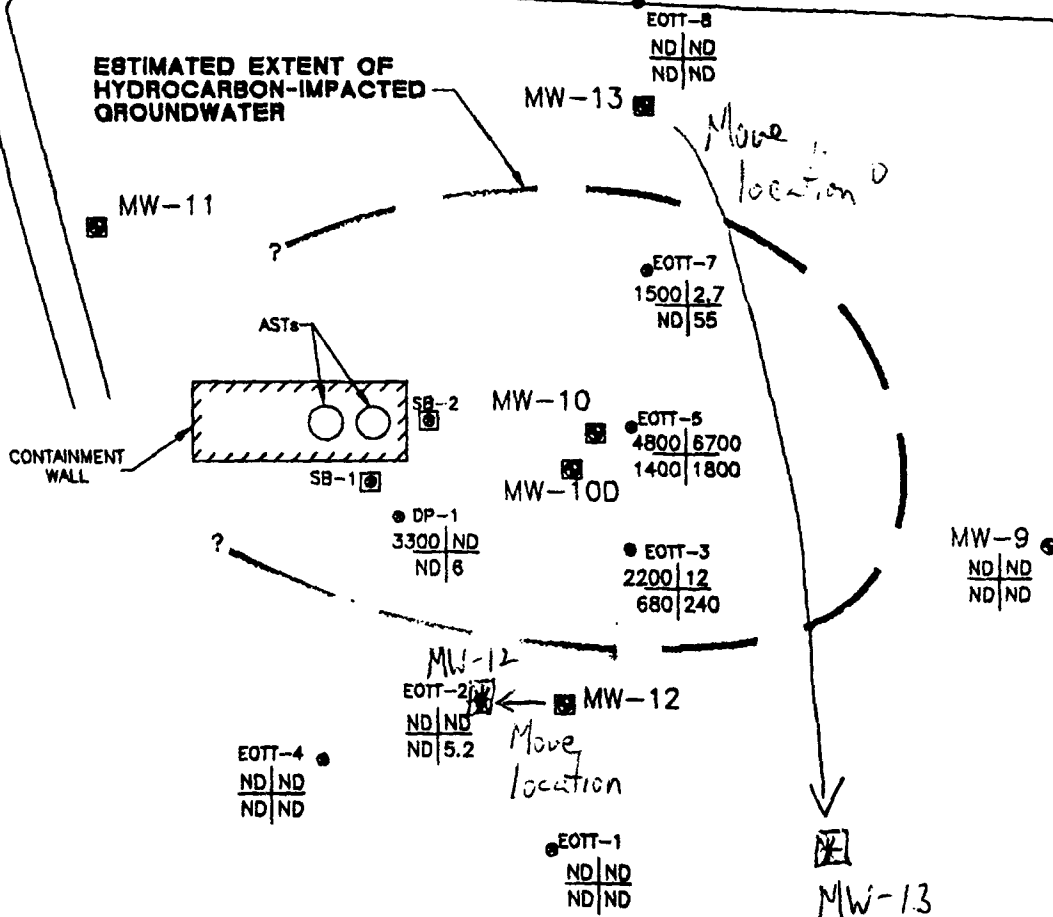
DATE: 1/26/95 REV. NO.: 0

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



LEGEND

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

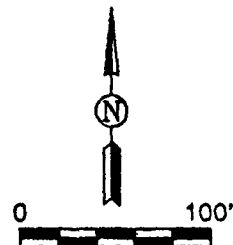
ND = NOT DETECTED

● = EXISTING MONITOR WELL LOCATION

● = TEMPORARY DRIVE POINT WELL (GCL 1994)

⊗ = PROPOSED SOIL BORING LOCATION

⊠ = PROPOSED MONITOR WELL LOCATION



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: LNMNRCH

**FIGURE 1
LINAM RANCH PLANT
SITE MAP**