

3R - 316

APPROVALS

YEAR(S):

2000



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

June 30, 2000

CERTIFIED MAIL

RETURN RECEIPT NO. 5051-3280

Ms. Ingrid Deklau
Williams Field Services
Star Route 2, Box 260
Green River, Wyoming 82935

RE: FINAL SAN JUAN BASIN GROUND WATER CLOSURE REPORTS

Dear Ms. Deklau:

The New Mexico Oil Conservation Division (OCD) has completed a review of PNM Gas Services' (PNM) January 27, 2000 "OCD CLOSURE REPORTS - 4TH REPORTING QUARTER 1999" and April 28, 2000 "OCD CLOSURE REPORTS - 1ST REPORTING QUARTER 2000". These documents contain "PIT REMEDIATION AND CLOSURE REPORTS" for 2 unlined pits in the San Juan Basin at which ground water contamination was discovered. The document requests closure of the sites since ground water has been remediated to below New Mexico Water Quality Control Commission (WQCC) standards as demonstrated in 4 consecutive quarterly sampling events at each site. The document also contains PNM's proposed monitoring well plugging and abandonment procedures.

The pit closure/remediation activities and the proposed monitor well plugging and abandonment proposals for the sites listed below are **approved**. As the current operator of these facilities this approval is issued to Williams Field Services (WFS).

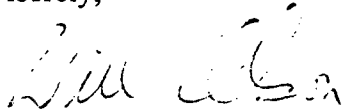
- | | | |
|----|-------------------------|-----------------------------|
| 1. | Florance #44 (Dehy pit) | Unit H, Sec. 31, T30N, R08W |
| 2. | Turner #1A (Dehy pit) | Unit M, Sec. 24, T31N, R11W |

Please be advised that OCD approval does not relieve WFS of liability if remaining contaminants are found to pose a future threat to surface water, ground water, human health or the environment.

In addition, OCD approval does not relieve WFS of responsibility for compliance with any other federal, state, tribal or local laws and regulations.

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

Sincerely,

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

William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Kathy Juckes, PNM Gas Services

3R - 316

**GENERAL
CORRESPONDENCE**

YEAR(S):

1998 - 1996



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

July 15, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-313

Mr. B.D. Shaw
Amoco Production Company
200 Amoco Court
Farmington, New Mexico 87401

**RE: GROUND WATER CONTAMINATION
FLORANCE 44 AND FLORANCE 47X WELL SITES**

Dear Mr. Shaw:

The New Mexico Oil Conservation Division (OCD) has recently reviewed Public Service Company of New Mexico's (PNM) April 29, 1998 "FLORANCE 44 SITE, RECONTAMINATION OF CLEAN FILL AND GROUNDWATER CONTAMINATION" and April 29, 1998 "FLORANCE 47X SITE, FREE PRODUCT AND GROUND WATER CONTAMINATION". These documents contain the results of PNM's recent investigation of ground water contamination related to PNM dehydrator pits at Amoco's Florance 44 and Florance 47X well sites.

A review of the above referenced documents shows that ground water contamination upgradient of PNM's former dehydration pits appears to be a result of production disposal activities related to Amoco's former separator pits. Therefore, the OCD requires that Amoco investigate and remediate soil and ground water contamination at and downgradient of Amoco's separator pits at these sites pursuant to Amoco's previously approved ground water remediation plan. Ground water contamination originating from PNM's former dehy pits will be handled by PNM. The OCD requests that Amoco work together with PNM for overall remediation of site ground waters.

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

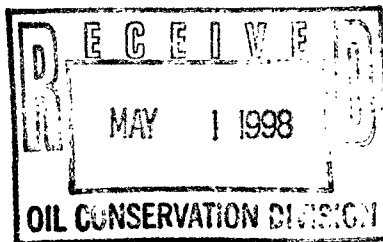
Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Nelson Velez, Blagg Engineering, Inc.
Maureen Gannon, PNM

April 29, 1998

Certified Mail:



Bill Olson
Hydrogeologist, Environmental Bureau
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

RE: Florance 44 Site
Recontamination of Clean Fill and Groundwater Contamination

Dear Bill:

PNM herein submits an update of ongoing activities at the Florance 44 well site. We have documented groundwater contamination and wish to update you on the latest results since the 1997 Annual Groundwater report of Unlined Surface Impoundments in the San Juan Basin, dated April 15, 1997. Since that time, we have conducted further investigation, source removal, and monitoring.

I. Well Locations, Groundwater Gradient and Analytical Results

The Florance 44 site lies in a remote location along the trailing slope of a tributary to Salvador Canyon. The tributary canyon is to the north and runs east-west, with sandstone bluffs to the south. Figure 1 provides a site map for the Florance 44 well site. The map includes the locations of the groundwater monitoring wells, wellheads, equipment, and pits found onsite. Table 1 also provides a summary of the groundwater analytical results collected to date from wells at the site.

Figures 2 and 3 show the direction of groundwater flow beneath the site for the months of May and August 1997. Depth to groundwater at this site ranges from about 8 to 40 feet. Groundwater generally flows towards the northeast beneath the site. Attachment A provides hydrographs and concentration versus time trends for monitoring wells at the site. There has been little seasonal change in groundwater elevation and flow direction at this site. Analytical results for this site were provided in the PNM March 1998 Annual Groundwater Report of Unlined Surface Impoundments.

II. Summary of Events

May 28, 1997

PNM performed quarterly groundwater sampling at the site. Sharp increases in benzene concentration were observed in monitoring wells MW-2 and MW-3 when compared with two prior quarters of data (see Table 1). Benzene concentrations in MW-2 and -3 were 865 and 237 ppb, respectively; increasing from the February 1997 maximum benzene concentration of 107 ppb. Benzene was the only constituent analyzed present above WQCC standards.

August 20, 1997

PNM performed quarterly groundwater sampling at the site. Benzene concentrations in MW-2 were 972 ppb; benzene concentrations in MW-3 increased to 948 ppb. Benzene was the only constituent analyzed present above WQCC standards.

November 1997

Based on a record of one full year of increasing benzene concentrations in monitoring wells within the former PNM dehydrator pit area, PNM elected to perform additional source removal. Approximately 3000 cubic yards of soil were excavated and approximately 2559 cubic yards of soil were remediated. Monitoring wells MW-2 and MW-3 were destroyed during the excavation process. Gross contamination was apparent upgradient from the former PNM drip pit, in the vicinity of the wellhead and in the direction of the former pit operated by Amoco.

III. Recontamination of the Remediated PNM Pit Vicinity

On May 13-17, 1996, PNM remediated its former dehydrator pit. Approximately 582 cubic yards of soil were excavated and landfarmed on site. The excavation was backfilled with clean soil obtained from an approved BLM location near the site. Amoco was notified of the presence of commingled soil contamination between the wellhead, Amoco's pits, and the former PNM dehydrator pit. The presence of groundwater contamination was confirmed and OCD was notified that the Florance 44 was a groundwater site.

The original PNM excavation in 1996 did not remove soils in the vicinity of the meter house and meter run. Based on an annual record of increasing benzene concentrations in monitoring wells MW-2 and MW-3, PNM performed additional source removal.

On November 18, 1997, PNM excavated additional soils in the vicinity of the meter house and meter run. A two-foot band of hydrocarbon-contaminated soil was excavated and landfarmed with Amoco's excavated soil. PNM excavation activities quickly revealed that the original clean fill placed into the remediated PNM dehydrator pit had been recontaminated. Amoco had recently remediated a pit to the south and upgradient of PNM's dehydrator pit (see Figure 1). Gross contamination was apparent upgradient from the former PNM drip pit, in the vicinity of the wellhead and in the direction of the former pit operated by Amoco.

An additional 2559 cubic yards of material were excavated to an average depth of 16 feet. Groundwater was encountered at 15 to 16 feet. Approximately 600 to 650 cubic yards of overburden were salvaged for reuse. The excavated soils were commingled with soils from the Amoco excavation for the purposes of remediation.

PNM will be placing Amoco and Williams Field Services on notice regarding the commingling of hydrocarbon soil contamination, the recontamination and subsequent remediation of PNM's clean fill related to migration of contamination from Amoco's onsite equipment and activities, and groundwater contamination at this site. PNM will be seeking cost recovery from the responsible party for actions concerning soil and groundwater investigation and remediation activities performed to date at this site.

PNM plans to collect one additional quarter of water quality data from monitoring wells at the Florance 44. In view of documented upgradient sources of contamination that have commingled with and recontaminated areas previously remediated by PNM, we request that OCD identify and then direct the responsible parties to take further action to remediate soil and groundwater at this site. If you have any questions related to the Florance 44 site or other project-related activities, please contact me at 505.241.2974.

Sincerely,



Maureen Gannon
Project Manager

cc: Roger Anderson, NMOCD
Colin Adams, PNM
Bill Von Drehle, Williams Field Services
Ingrid Deklau, Williams Field Services
Buddy Shaw, Amoco
Denny Foust, NMOCD-Aztec

Florance 44: Site Map With Analytical Results (Concentrations in ppb)

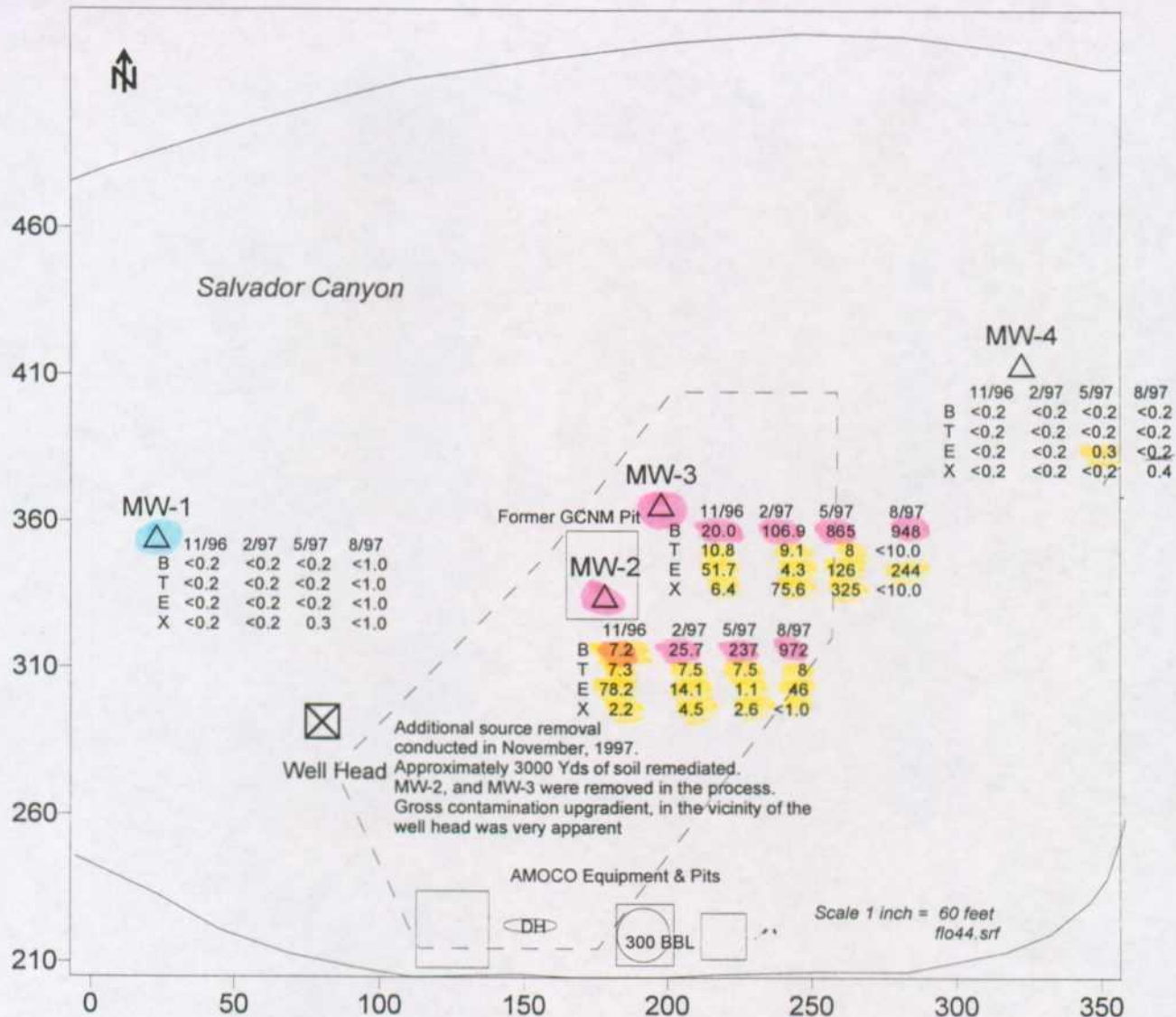
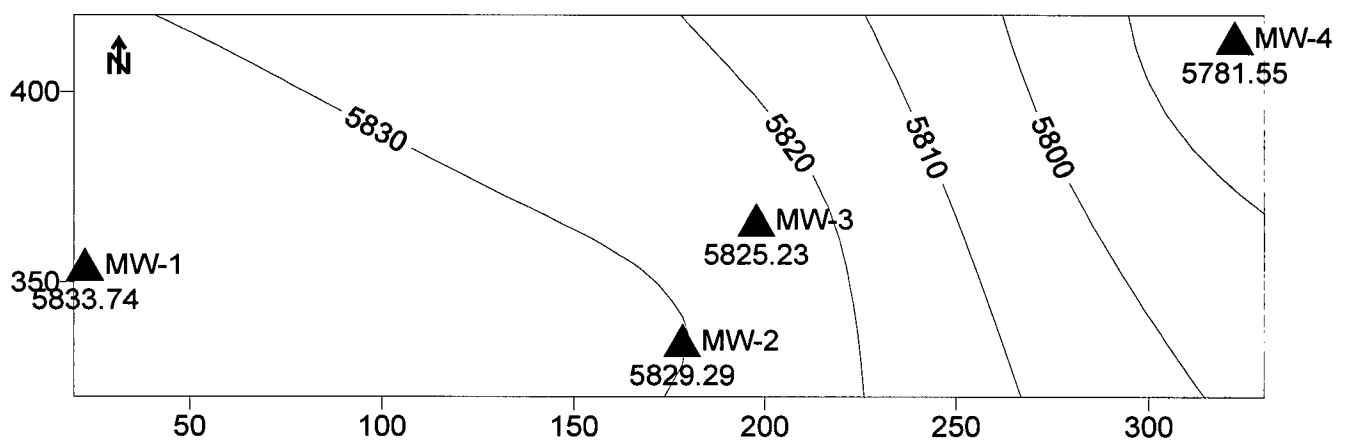


Table 1: SUMMARY OF ANALYTICAL RESULTS

GROUNDWATER MONITORING DATA - collected by PNM, except as noted

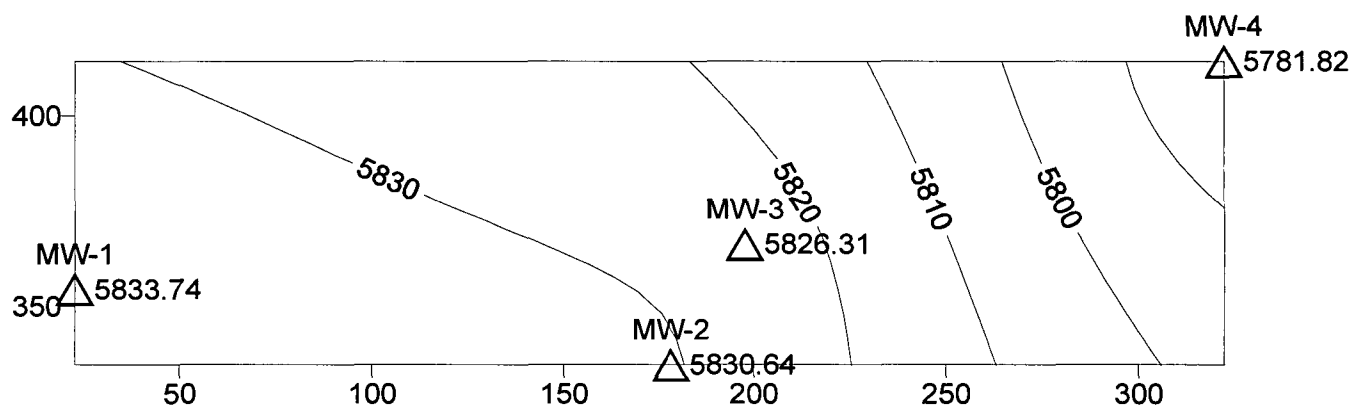
Well	Date Sampled	GWEL (ft,msl)	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Xylenes (ug/L)	Total BTEX (ug/L)
MW-1 Upgradient well	11/08/96	5832.76	<0.2	<0.2	<0.2	<0.2	<0.2
	02/07/97	5833.74	<0.2	<0.2	<0.2	<0.2	<0.2
	05/28/97	5834.51	<0.2	<0.2	<0.2	0.3	0.3
	08/20/97	5833.74	<1	<1	<1	<1	<1
MW-2 PNM drip pit well	11/08/96	5827.66	7.2	7.3	78.2	2.2	94.9
	02/07/97	5829.29	25.7	7.5	14.1	4.5	51.8
	05/28/97	5830.36	237.0	7.5	1.1	2.6	248.2
	08/20/97	5830.64	972.0	8.0	46.0	<1	1026.0
MW-3 Downgradient well	11/08/96	5823.40	20.0	10.8	51.7	6.4	88.9
	02/07/97	5825.23	106.9	9.1	4.3	75.6	195.9
	05/28/97	5826.18	865.0	8.0	126.0	325.0	1324.0
	08/20/97	5826.31	948.0	<10	244.0	<10	1192.0
MW-4 Downgradient, down-canyon well	11/08/96	5779.98	<0.2	<0.2	<0.2	<0.2	<0.2
	02/07/97	5781.55	<0.2	<0.2	<0.2	<0.2	<0.2
	05/28/97	5781.50	<0.2	<0.2	<0.2	0.3	0.3
	08/20/97	5781.82	<0.2	<0.2	<0.2	0.4	0.4

Florance 44 Groundwater Contour Map (May 28, 1997)



Scale: 1" = 50' Flo44528.srf

Florance 44 Groundwater Contour Map (August 20, 1997)

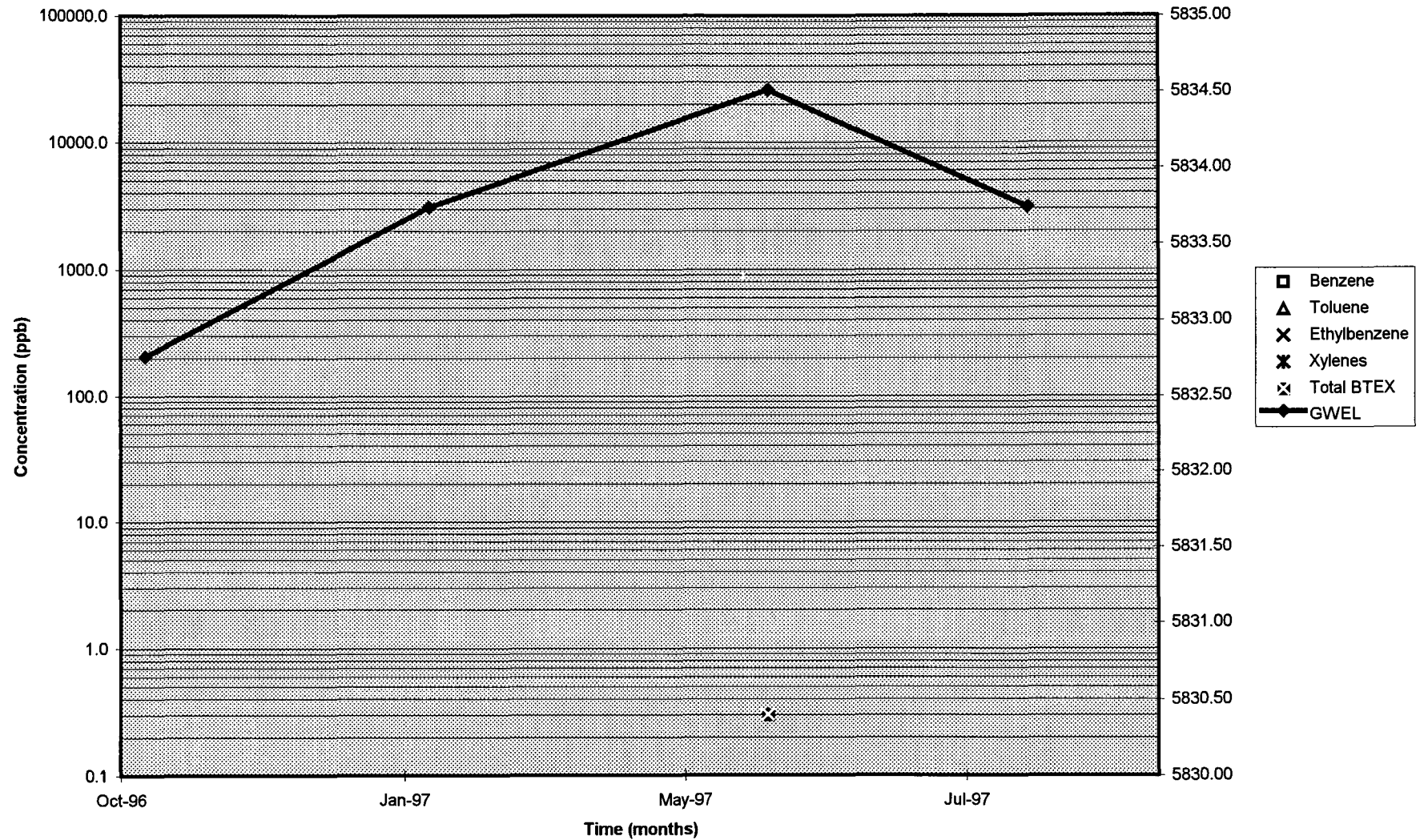


Scale: 1" = 50' Flo44820.srf

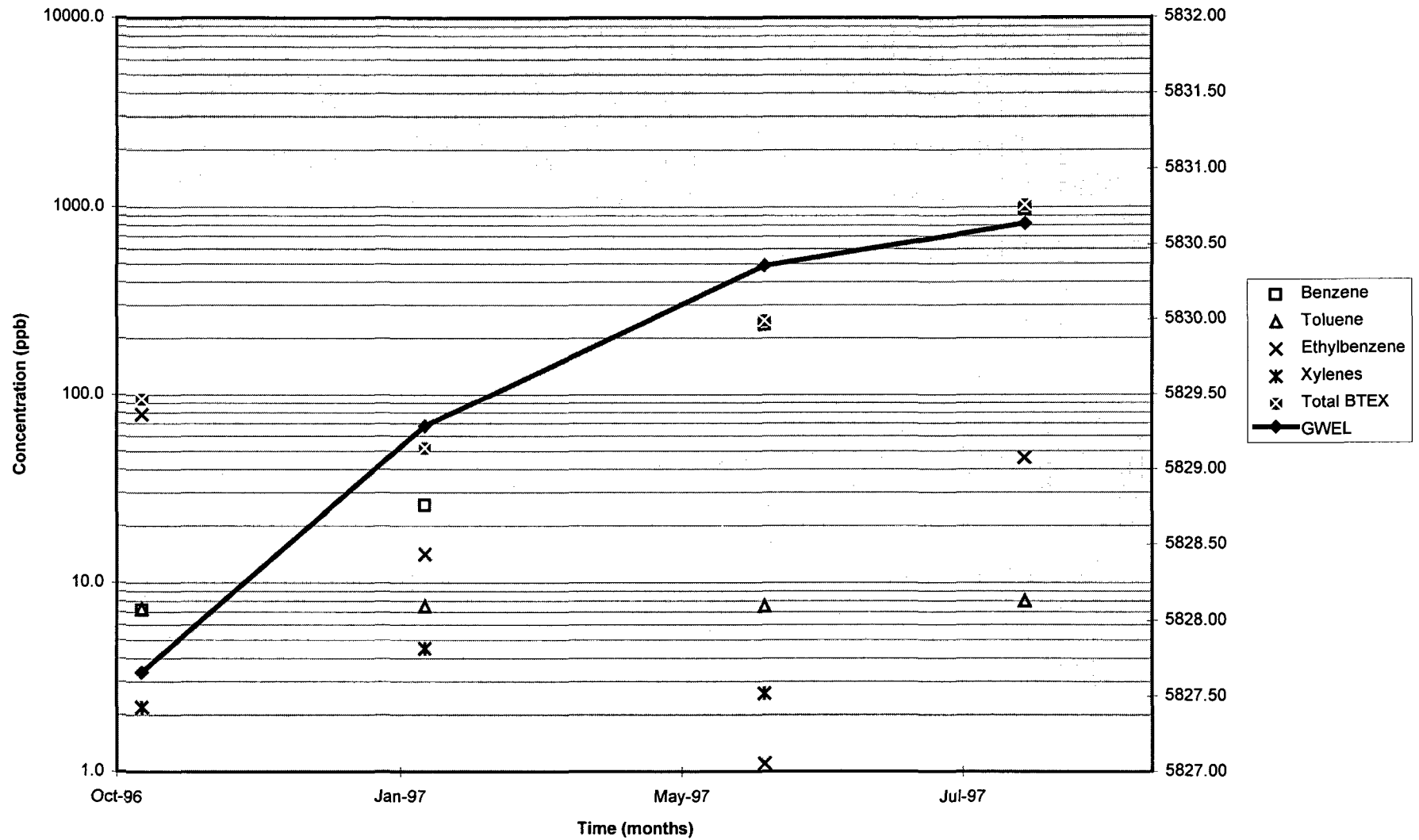
Attachment A

Hydrographs and Concentrations versus Time

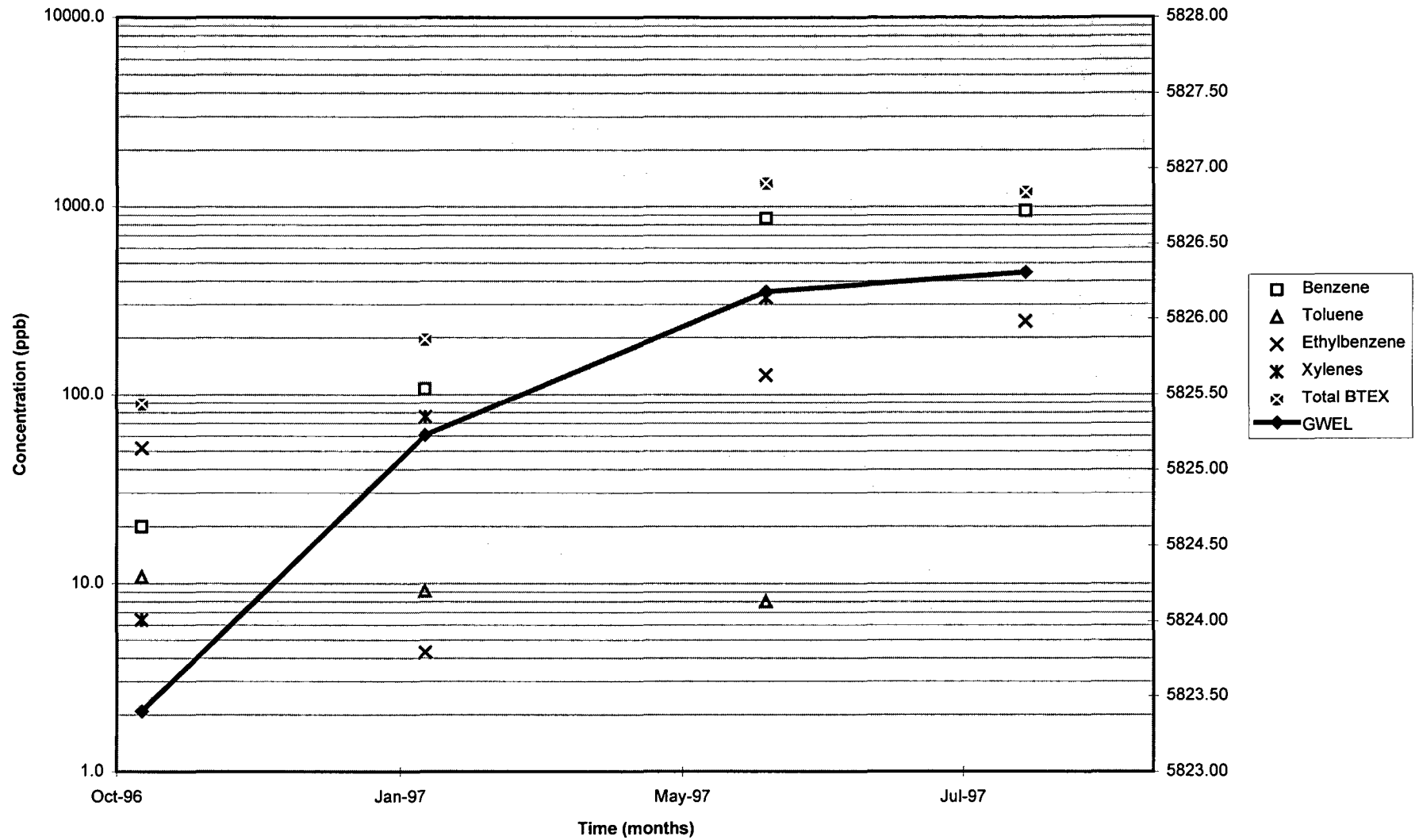
MW-1: Trends with Time



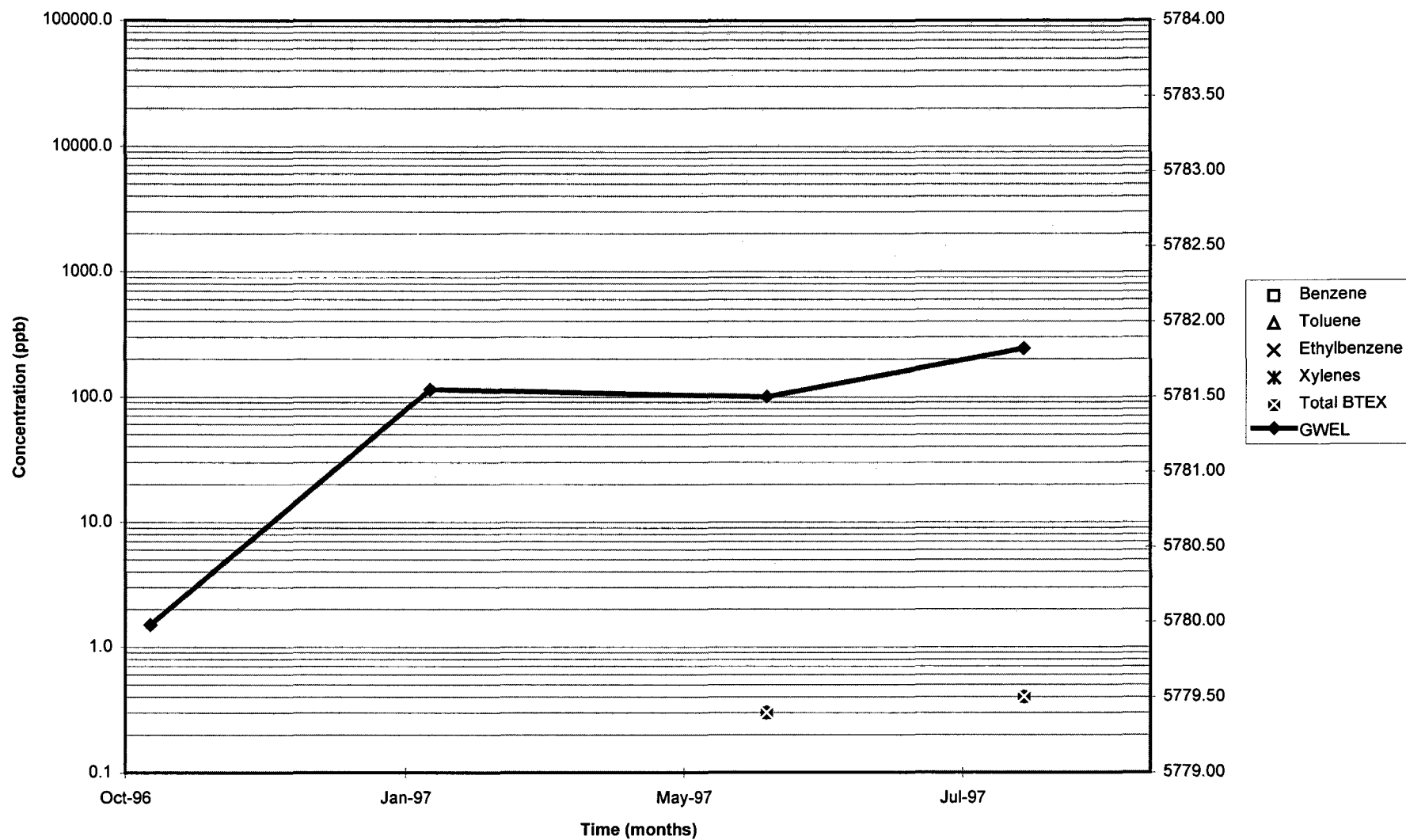
MW-2: Trends with Time



MW-3: Trends with Time



MW-4: Trends with Time



November 1, 1996

Mr. William Olson
Hydrogeologist
Oil Conservation Division
2040 So. Pacheco
Santa Fe, New Mexico 87505



RE: SAN JUAN BASIN 3RD QUARTER 1996 GROUNDWATER REPORT

Dear Bill:

PNM Gas Services, PNMGS, (formerly Gas Company of New Mexico) is pleased to submit the 3rd Quarter 1996 Groundwater Report on Unlined Surface Impoundments in the San Juan Basin. Pursuant to PNM's Groundwater Management Program for Unlined Surface Impoundment Closures, the report details the ongoing investigation/remedial activities at unlined surface impoundments having groundwater contamination as identified by PNM. A list of groundwater sites is provided below.

Abrams Gas/Com L1
Cozzens B1
Cozzens B1E
Florance 32A
Florance 44
Florance 124
Honolulu Loop-Line Drip
Kaufmann 1
McCoy A1A
Templeton 1E
Zachry 18E

RECEIVED

NOV 04 1996

Environmental Bureau
Oil Conservation Division

PNM hereby requests two modifications of our Groundwater Management Program Unlined Surface Impoundment Closures submitted to OCD in March of 1996:

- PNM wishes to file annual groundwater progress reports to the OCD instead of quarterly reporting. Concerning sites with problematic or unusual activities, we will prepare individual reports to the OCD between annual reports as necessary. We will also file closure reports on groundwater sites as remediation is completed.
- PNM also asks for an exemption from notifying the OCD 48 hours in advance of any major sampling event or related activity at a groundwater site. We invite OCD to participate in our sampling events at any time. Please feel free to call Denver Bearden or me to schedule a time in the field with us.

If you have any questions regarding the contents of this report or the proposed modifications, please contact me at (505) 241-2974.

Sincerely,
PNM Environmental Services Department

A handwritten signature in cursive script, appearing to read "Maureen Gannon".

Maureen Gannon
Project Manager

Attachment

cc: Denver Bearden, PNMGS
Denny Foust, OCD-Aztec Office
Leigh Gooding, WFS

bcc: Colin Adams (w/o analytical results)
Ron Johnson (w/o analytical results)
Toni Ristau (w/o analytical results)
Mark Sikelianos (w/o analytical results)

PNMGS Well Site: **Florence #44**

Groundwater Site Summary Report

Copies: WFS(1)
Operator (1)
NMOCD District Office (1)
NMOCD Santa Fe (1)

Quarter: 3 Year: 96

Operator: Amoco
Sec: 31 Twn: 30 Rng: 8 Unit: H
Canyon: Salvador, San Juan

Vulnerable Class: Extended
OCD Ranking: 20
Lead Agency: NMOCD

Topo Map: previously submitted
Groundwater Contour Map: N/A
Hydrograph: N/A
Site Map with Analysis: N/A
Well Completion Diagram: N/A
Analytical Results: N/A

Activities for Quarter:

On July 23, 1996, PNM installed two monitoring wells at the Florence #44 well site using a backhoe. After obtaining a temporary use permit from the BLM, PNM installed two additional wells on October 10, 1996.

Conclusions and Recommendations:

N/A

Further Action:

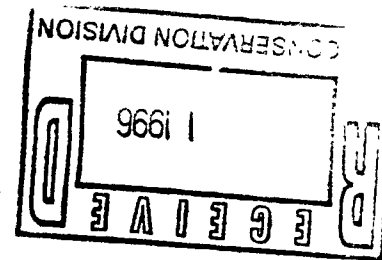
During the fourth quarter of 1996, PNM will perform groundwater monitoring of the four wells at the site.

Public Service Company of New Mexico - Gas Services

Environmental Services Division - Alvarado Square, MS-0408
Albuquerque, NM 87158

Contact: Maureen Gannon

Telephone: 505-241-2974



August 1, 1996

Mr. William Olson
Hydrogeologist
Oil Conservation Division
2040 So. Pacheco
Santa Fe, New Mexico 87505



RE: SAN JUAN BASIN 2ND QUARTER 1996 GROUNDWATER REPORT

Dear Bill:

PNM Gas Services, PNMGS, (formerly Gas Company of New Mexico) is pleased to submit the 2nd Quarter 1996 Groundwater Report on Unlined Surface Impoundments in the San Juan Basin. Pursuant to PNM's Groundwater Management Program for Unlined Surface Impoundment Closures, the report details the ongoing investigation/remedial activities at unlined surface impoundments having groundwater contamination as identified by PNM. A list of groundwater sites is provided below.

Abrams Gas/Com L1
Cozzens B1
Cozzens B1E
Florance 44
Honolulu Loop-Line Drip
Kaufmann 1
McCoy A1A
Templeton 1E

If you have any questions regarding the contents of the report, please contact me at (505) 241-2974.

Sincerely,
PNM Environmental Services Department

Maureen Gannon
Project Manager

MDG/GASPITS/OLSON01.LTR

Attachment

cc: Denver Bearden, PNMGS
Denny Foust, OCD-Aztec Office
Leigh Gooding, WFS

**Public Service Company of New Mexico
2nd Quarter 1996 Groundwater Report
August 1, 1996**

Prepared for:

**New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505**

Prepared by:

**Public Service Company of New Mexico
Environmental Services Department
Alvarado Square - MS 0408
Albuquerque, New Mexico 87158**

PNMGS Well Site: Florence #44

Site Summary Report

Copies: WFS(1)
Operator (1)
NMOCD District Office (1)
NMOCD Santa Fe (1)

Quarter: 2 Year: 96

Operator: Amoco
Sec: 31 Twn: 30 Rng: 8 Unit: H
Canyon: Salvador, San Juan River

Vulnerable Class: Extended
OCD Ranking: 20
Lead Agency: NMOCD

Topo Map: N/A
Groundwater Contour Map: N/A
Site Map with Analysis: N/A
Well Completion Diagram: N/A
Hydrograph: N/A

Activities for Quarter:

PNM did not conduct groundwater-related activities at the Florence 44 during the second quarter of 1996. On July 23, 1996, PNM installed two monitoring wells at the site using a backhoe. Additional wells will require a drill rig and installation off the well pad.

Conclusions and Recommendations:

N/A

Further Action:

PNM will contact BLM to attempt a temporary use permit to conduct work off the well pad subsequent to further action at the site.

Public Service Company of New Mexico - Gas Services

Environmental Services Division - Alvarado Square, MS-0408
Albuquerque, NM 87158

Contact: Maureen Gannon

Telephone: (505) 241-2974

RECEIVED

MAY 3 1996

PERMITS DIVISION

May 29, 1996



Mr. William Olson
Hydrogeologist
Oil Conservation Division
2040 So. Pacheco
Santa Fe, New Mexico 87505

RE: NOTIFICATION OF GROUNDWATER CONTAMINATION AT THE FLORENCE #44
WELL SITE

Dear Bill:

Pursuant to New Mexico Water Quality Control Commission (WQCC) Regulations, section 1-203, PNM hereby provides written notification of groundwater contamination at the Florence 44 well site, located section 31, township 30 North, range 8 West, unit letter H. A topographic map showing the location of the site is provided as an attachment. The operator is Amoco Oil Company. This letter follows verbal notification provided to you on Friday May 24, 1996 (M. Gannon, PNM to B. Olson. OCD, 5/24/96).

On May 15, 1996, field personnel collected a sample from groundwater in an excavation approximately 15 feet below ground surface. The groundwater sample was delivered to OnSite Technologies, Ltd., in Farmington, New Mexico, for laboratory analysis. Analytical results are provided below:

Component	Units	WQCC Stds.	Pit Excavation Water Sample
Benzene	ppb	10	1,767.5
Toluene	ppb	750	6,841.7
Ethylbenzene	ppb	750	449.6
Xylenes	ppb	620	766.1

Boldtype indicates a WQCC exceedance.

A hardcopy of the analytical results are attached.

Florence 44
5/29/96
Page 2

This letter serves as written notification of groundwater impact at the Florence 44. PNM will conduct future activities at the site pursuant to PNM's Groundwater Management Plan. If you have any questions, please call me at 241-2974. Thank you.

Sincerely,
PNM

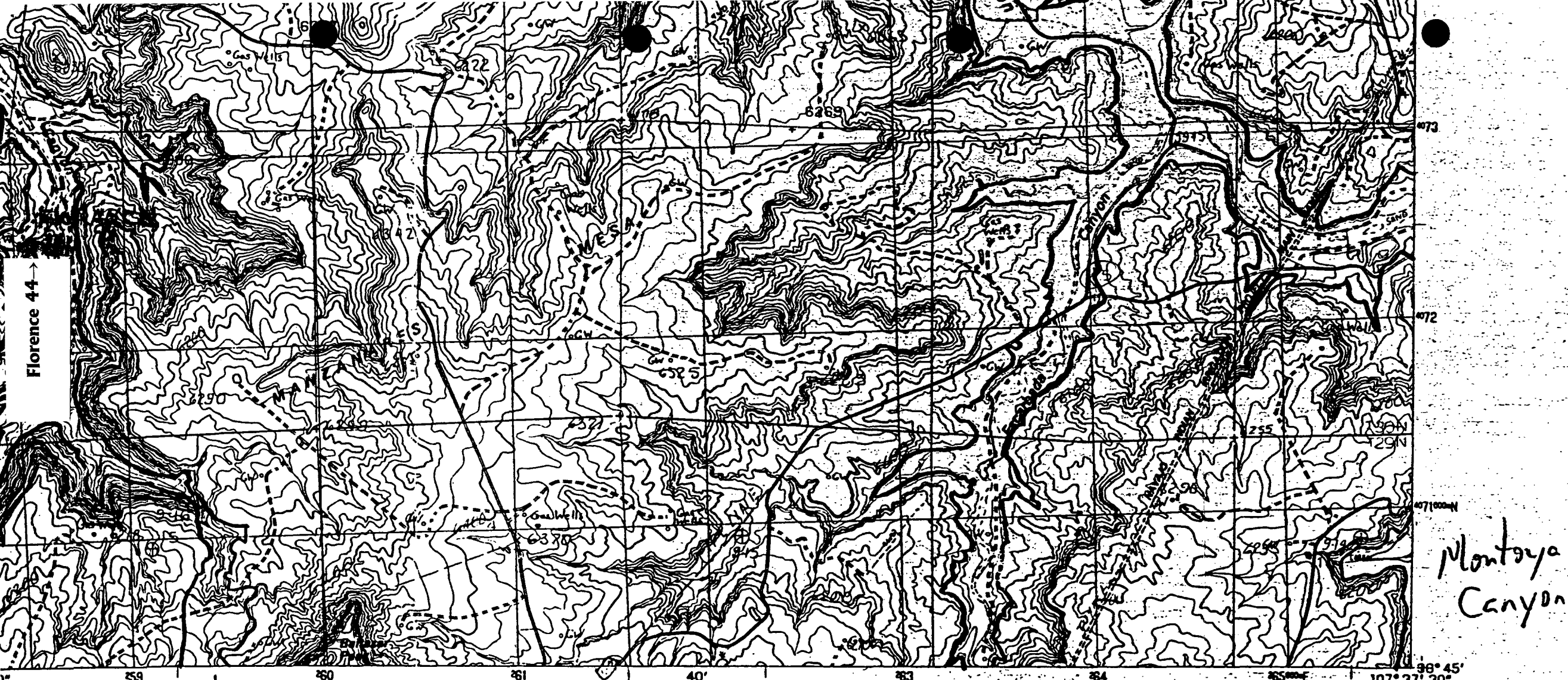


Maureen Gannon
Project Manager

MDG/FLOR4401.ltr

Attachment

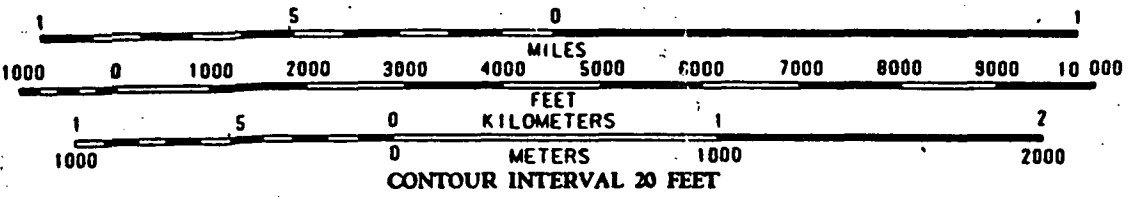
cc: Colin Adams, PNM
Denver Bearden, PNMGS
Denny Foust, OCD-Aztec Office
Leigh Gooding, WFS
Toni Ristau, PNM
Buddy Shaw, Amoco



Florence 44 →

Montoya Canyon

SCALE 1:24 000



QUADRANGLE LOCATION

1	2	3	1 Mount Hiko
			2 Anasazi Spring
			3 Snow Mountain
4		5	4 Turkey
			5 Pine River
			6 Blaine
6	7	8	7 Cedar Canyon
			8 Delgadito Mesa

ADJOINING 7.5' QUADRANGLE NAMES

ROAD LEGEND

- Improved Road
- Unimproved Road
- Trail
- Interstate Route ○ U.S. Route ○ State Route

14

ARCHULETA, NEW MEXICO
PROVISIONAL EDITION 1985

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225
OR RESTON, VIRGINIA 22092

36107-G6-TP-024

OFF: (505) 325-8786



LAB: (505) 325-5667

AROMATIC VOLATILE ORGANICS

Attn: *Maureen Gannon*
Company: *PNM Gas Services*
Address: *Alevardo Square, Mail Stop 0408*
City, State: *Albuquerque, NM 87158*

Date: *16-May-96*
COC No.: *4683*
Sample No. *10888*
Job No. *2-1000*

Project Name: *PNM Gas Services - Florance 44*
Project Location: *9605151010; Pit Excavation Water Sample*
Sampled by: *RH* Date: *15-May-96* Time: *10:10*
Analyzed by: *DC* Date: *16-May-96*
Sample Matrix: *Liquid*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	1767.5	ug/L	0.2	ug/L
<i>Toluene</i>	6841.7	ug/L	0.2	ug/L
<i>Ethylbenzene</i>	449.6	ug/L	0.2	ug/L
<i>m,p-Xylene</i>	4422.7	ug/L	0.2	ug/L
<i>o-Xylene</i>	766.1	ug/L	0.2	ug/L
	<i>TOTAL</i>	14247.7	ug/L	

Method - SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography

Approved by: *Ja4*
Date: *5/16/96*

P. O. BOX 2606 • FARMINGTON, NM 87499

— TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT —

OFF: (505) 325-8786



LAB: (505) 325-5667

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 16-May-96

Internal QC No.: 0444-STD

Surrogate QC No.: 0445-STD

Reference Standard QC No.: 0355-STD

Method Blank

Analyte	Result	Units of Measure
Average Amount of All Analytes In Blank	<0.2	ppb

Calibration Check

Analyte	Units of Measure	True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20.0	19.0	5	15%
Toluene	ppb	20.0	19.7	2	15%
Ethylbenzene	ppb	20.0	20.0	0	15%
m,p-Xylene	ppb	40.0	39.6	1	15%
o-Xylene	ppb	20.0	19.8	1	15%

Matrix Spike

Analyte	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	88	88	(39-150)	1	20%
Toluene	91	94	(46-148)	2	20%
Ethylbenzene	89	88	(32-160)	1	20%
m,p-Xylene	92	92	(35-145)	0	20%
o-Xylene	88	92	(35-145)	3	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovered	(70-130)	
10888-4683	102	

S1: Fluorobenzene

P. O. BOX 2606 • FARMINGTON, NM 87499

- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -



State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 1105	Date 5/23/96
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Originating Party

Other Parties

Maureen Gannon - PNM

Bill Olson - Envir. Bureau

Subject

Florence #44 - Unit H, Sec 31, T30N, R8W

Discussion

PNM discovered ground water contamination during pit closure at the Amoco Florence #44 site

Water sample results Benzene - 1700 ppb
Total BTEX - 14,000 ppb

Conclusions or Agreements

PNM will remediate/~~investigate~~ under GW Management Plan of PNM

Distribution

Signed

Bill Olson