

3R - 324

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**  
2000-1997

**Olson, William**  
**From:** Olson, William  
**Sent:** Monday, March 06, 2000 8:13 AM  
**To:** 'Gannon, Maureen'  
**Subject:** RE: Request for Extension on Annual Groundwater Report

The below requested extension is approved.

---

-----  
**From:** Gannon, Maureen [SMTP:MGannon@pnm.com]  
**Sent:** Saturday, March 04, 2000 3:31 PM  
**To:** Olson, William  
**Cc:** Sikelianos, Mark; 'Ingrid Deklau'; Johnson, Ronald  
**Subject:** Request for Extension on Annual Groundwater Report

As a follow-up to our phone conversation on Thursday, March 2, 2000, PNM herein requests an extension of the date for submittal of our San Juan Basin Annual Groundwater Report. The report is normally due on April 1st of each year. However, since PNM's environmental obligations associated with the purchase and sale of our former gas assets in the San Juan Basin will terminate on June 30, 2000 (with the exception of retained liabilities), we would like to file our annual report by July 15, 2000 so that the data and information contained in the annual report is current through the June 30th date.

Please let me know if this extension is acceptable to you. You may email me or call me at (505) 241-2974. Thank you for your time and consideration of this matter.

Maureen Gannon  
Environmental Services  
241-2974

Public Service Company  
of New Mexico  
Alvarado Square MS 0408  
Albuquerque, NM 87158

SEP 14 1999

September 13, 1999

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



**RE: WELL INSTALLATION PLANS FOR SAN JUAN BASIN GROUNDWATER SITES**

Dear Bill:

PNM herein submits monitoring well installation plans for several groundwater sites that we are managing in the San Juan Basin. You requested these plans in an August 16, 1999 letter entitled, "Final San Juan Basin Pit Closure Reports," that was sent to Ms. Kathy Juckes, PNM-Farmington. The subject groundwater sites are the Dogie Compressor Station North Pit, Florance #32A, Jacques #2A, Mangum #1E, McClanahan #22, Dogie Compressor Station East Pit, Honolulu Loop Line Drip, Ice Canyon Drip, Jicarilla Contract 147-6, and Randleman #1.

The well installation plan for each of the above-referenced sites consists of a map depicting the existing monitoring well configuration at the site with associated historical BTEX data. Any proposed new well location is denoted by a large "X" on the map. In some instances, the proposed wells have already been installed and sampled, and the analytical results for BTEX are reported next to these locations on the attached maps. PNM will prepare formal reports on all of the subject sites requiring new well installations in either individual groundwater/pit closure reports or the Annual Groundwater Report to be submitted to the OCD in 2000.

PNM would like to bring the Randleman 1 well site and the Honolulu Loop Line Drip to your attention. The Randleman 1 site is operated by Burlington Resources and poses many unique problems, including:

- an increase in benzene concentrations in PNM's source and downgradient wells after cessation of discharge, and primary and secondary remediation of PNM's former pit (see figure 10);
- elevated chloride levels groundwater monitoring wells on site (see attachment to figure 10); and
- potential impacts to underlying groundwater from Burlington's operations and their former pit (Approximately one year after remediation, Burlington's pit excavation and on site landfarm remain open).

The Honolulu Loop Line Drip is operated by Williams and has also experienced its own set of problems, including, most recently, a significant increase in benzene in MW-5 and MW-12 (see figure 7 and attachment to figure 7). As you may recall, PNM conducted extensive secondary removal of contaminated soils in the area and south of Williams pipeline in December of 1998 after the appearance of free product and high dissolved-phase BTEX contaminants. At both the Randleman 1 and the Honolulu Loop Line Drip, PNM agrees that the installation of additional wells is necessary to fully define the extent of the dissolved-phase contaminant plumes. However, such action, on the part of PNM, assumes that all responsibility at the site is ours. In contrast, we believe that the ongoing problems may be the responsibility of the producer or are at least shared with them. Therefore, before agreeing to install additional wells at these particular locations, PNM is considering several options at either site and will be contacting you in the very near future to inform you of our proposed strategies.

Mr. B. Olson  
09/13/1999  
Page 2

Please review the attached site maps and accept them as our groundwater monitoring well installation plans. All well installations and sampling events will be conducted in accordance with PNM's Groundwater Management Plan for Unlined Surface Impoundments, March 1996. If you need additional information or have any questions, you may call me at (505) 241-2974. Thank you for your time and consideration concerning this matter.

Sincerely,  
PNM Environmental Services

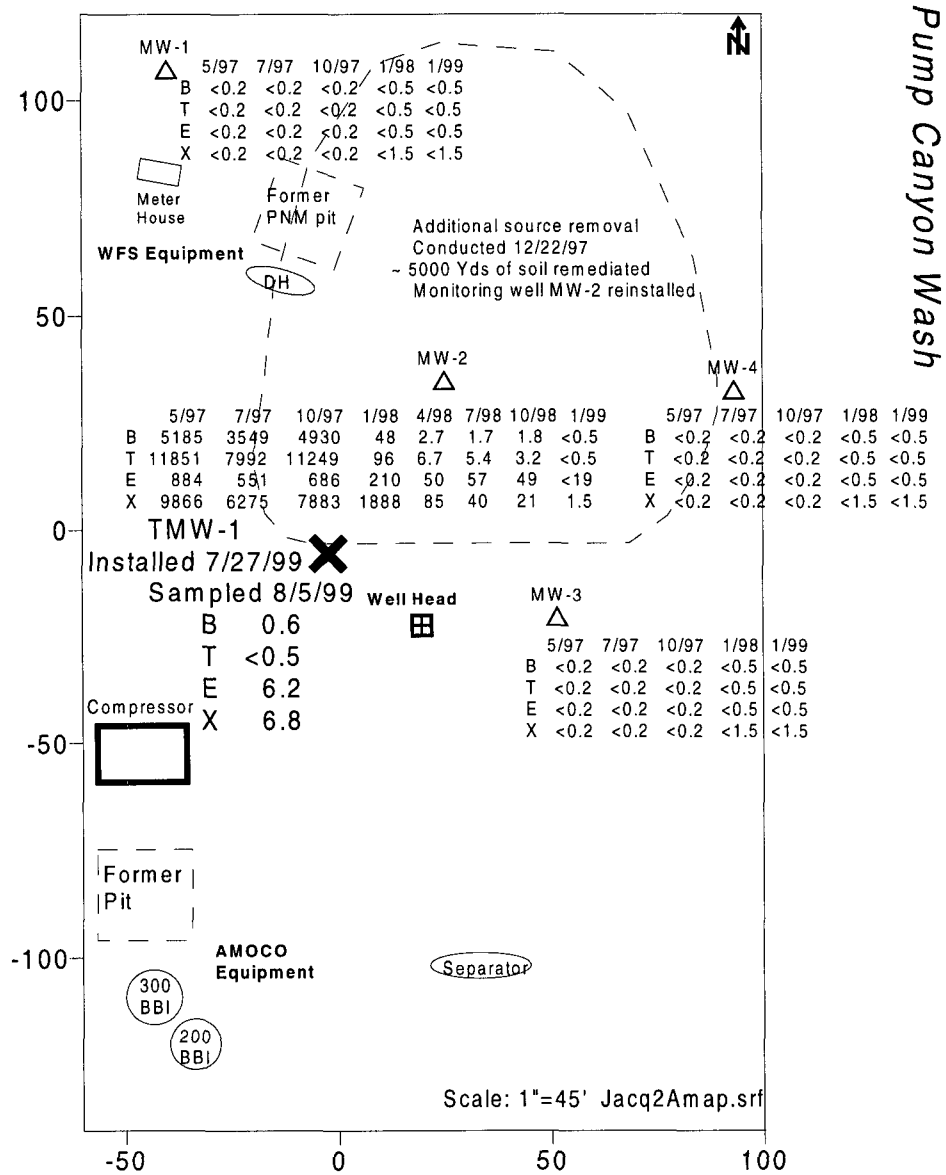


Maureen Gannon  
Project Manager

Attachments

cc: Ingrid Deklau, WFS  
Denny Foust, OCD-Aztec Office  
Kathy Juckes, PNM Farmington File  
Keith Manwell, Jicarilla Environmental Protection Office  
Mark Sikelianos, PNM

**Figure 3.**  
**Jacques 2A Site Map & Analytical Results**  
**(Concentrations in ppb)**



**Olson, William**

---

**From:** Olson, William  
**Sent:** Tuesday, August 31, 1999 8:07 AM  
**To:** 'MGannon@pnm.com'  
**Subject:** RE: Request for Extension  
**Importance:** High

The below requested extension is approved.

-----  
**From:** MGannon@pnm.com[SMTP:MGannon@pnm.com]  
**Sent:** Monday, August 30, 1999 4:30 PM  
**To:** Olson, William  
**Cc:** MSikeli@pnm.com  
**Subject:** Request for Extension

As discussed with you last week during the OCC hearing on the Hampton 4M site, PNM requests an extension to complete our plans documenting additional ground water monitoring well installations at several sites we are currently managing in the San Juan Basin. Your letter of August 16, 1999 asks that a plan be submitted by Tuesday, August 31, 1999. We request an additional two weeks from this date to finish the plans and submit them to your office. We will have the plans to you by Tuesday, September 14, 1999.

We appreciate your patience in this matter. If you have any questions or concerns, please call me at (505) 241-2974.

Maureen Gannon  
Environmental Services  
241-2974



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

May 28, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-274-520-668**

Ms. Maureen Gannon  
Public Service Company of New Mexico  
Alvarado Square, MS-0408  
Albuquerque, New Mexico 87401

**RE: 1999 SAN JUAN BASIN ANNUAL GROUNDWATER REPORT**

Dear Ms. Gannon:

The New Mexico Oil Conservation Division (OCD) has reviewed Public Service Company of New Mexico's (PNM) April 5, 1999 "1999 SAN JUAN BASIN ANNUAL GROUNDWATER REPORT". This document contains the results of PNM's 1998 monitoring and remediation of contaminated ground water related to the closure of unlined oil and gas production pits in the San Juan Basin.

The OCD has the following comments and requirements regarding the above referenced document:

- A. On July 14, 1999, the OCD required that PNM install additional ground water monitoring wells at 7 sites to determine the extent of ground water contamination that was in excess of New Mexico Water Quality Control Commission (WQCC) ground water standards. According to the above referenced documents additional wells were installed at 2 of the sites. However, the documents do not contain any information on the installation of additional monitoring wells for the sites listed below. The OCD requires that PNM submit a plan to address this deficiency for these sites. The plan shall be submitted to the OCD Santa Fe Office by July 28, 1999 with a copy provided to the OCD Aztec District Office.

- |                                       |                             |
|---------------------------------------|-----------------------------|
| 1. Dogie Compressor Station North Pit | Unit D, Sec. 04, T25N, R06W |
| 2. Florance #32A                      | Unit F, Sec. 15, T30N, R08W |
| 3. Jacques #2A                        | Unit D, Sec. 25, T30N, R09W |
| 4. Mangum #1E                         | Unit F, Sec. 33, T29N, R11W |
| 5. McClanahan #22                     | Unit G, Sec. 14, T28N, R10W |

Ms. Maureen Gannon  
May 28, 1999  
Page 2

- B. The closure reports for the sites listed below show that the extent of ground water contamination in excess of New Mexico WQCC ground water standards has not been completely defined. Therefore, the OCD requires that PNM submit a plan for the installation of additional monitor wells to determine the extent of ground water contamination at these sites. The plan shall be submitted to the OCD Santa Fe Office by July 28, 1999 with a copy provided to the OCD Aztec District Office.

1. Dogie Compressor Station East Pit	Unit D, Sec. 04, T25N, R06W
2. Honolulu Line Drip	Unit B, Sec. 15, T26N, R04W
3. Ice Canyon Drip	Unit H, Sec. 13, T26N, R07W
4. Jicarilla Contract 147-6	Unit C, Sec. 06, T25N, R05W
5. Randalman #1	Unit K, Sec. 13, T31N, R11W

- C. Several of the reports state that certain contaminants such as chloride, sulfate and total dissolved solids are not enforceable standards under State of New Mexico regulations. For your information, all of the WQCC standards as contained in 20 NMAC 6.2.3101 are enforceable standards.

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office  
Bill Liess, BLM Farmington District Office  
Kurt Sandoval, Jicarilla Apache Environmental Protection 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

May 28, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-274-520-668**

Ms. Maureen Gannon  
Public Service Company of New Mexico  
Alvarado Square, MS-0408  
Albuquerque, New Mexico 87401

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- |                                       |                             |
|---------------------------------------|-----------------------------|
| 1. Dogie Compressor Station North Pit | Unit D, Sec. 04, T25N, R06W |
| 2. Florance #32A                      | Unit F, Sec. 15, T30N, R08W |
| 3. Jacques #2A                        | Unit D, Sec. 25, T30N, R09W |
| 4. Mangum #1E                         | Unit F, Sec. 33, T29N, R11W |
| 5. McClanahan #22                     | Unit G, Sec. 14, T28N, R10W |

Ms. Maureen Gannon  
May 28, 1999  
Page 2

- B. The closure reports for the sites listed below show that the extent of ground water contamination in excess of New Mexico WQCC ground water standards has not been completely defined. Therefore, the OCD requires that PNM submit a plan for the installation of additional monitor wells to determine the extent of ground water contamination at these sites. The plan shall be submitted to the OCD Santa Fe Office by July 28, 1999 with a copy provided to the OCD Aztec District Office.

- |    |                                   |                             |
|----|-----------------------------------|-----------------------------|
| 1. | Dogie Compressor Station East Pit | Unit D, Sec. 04, T25N, R06W |
| 2. | Honolulu Line Drip                | Unit B, Sec. 15, T26N, R04W |
| 3. | Ice Canyon Drip                   | Unit H, Sec. 13, T26N, R07W |
| 4. | Jicarilla Contract 147-6          | Unit C, Sec. 06, T25N, R05W |
| 5. | Randalman #1                      | Unit K, Sec. 13, T31N, R11W |

- C. Several of the reports state that certain contaminants such as chloride, sulfate and total dissolved solids are not enforceable standards under State of New Mexico regulations. For your information, all of the WQCC standards as contained in 20 NMAC 6.2.3101 are enforceable standards.

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office  
Bill Liess, BLM Farmington District Office  
Kurt Sandoval, Jicarilla Apache Environmental Protection 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

July 14, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-235-437-312**

Ms. Maureen Gannon  
Public Service Co. of New Mexico - Gas Services  
Alvarado Square, MS-0408  
Albuquerque, New Mexico 87401

**RE: SAN JUAN BASIN ANNUAL GROUNDWATER REPORT**

Dear Ms. Gannon:

The New Mexico Oil Conservation Division (OCD) has reviewed Public Service Company of New Mexico's (PNM) April 2, 1998 "1998 SAN JUAN BASIN ANNUAL GROUNDWATER REPORT". This document contains the results of PNM's 1997 monitoring and remediation of contaminated ground water related to the closure of unlined oil and gas production pits in the San Juan Basin.

Below is the OCD's review of this document:

- A. The closure reports for the sites listed below shows that the extent of ground water contamination in excess of New Mexico Water Quality Control Commission (WQCC) ground water standards has not been completely defined. Therefore, the OCD requires that PNM install additional ground water monitoring wells to monitor and determine the extent of ground water contamination pursuant to their previously approved ground water investigation plan.

- |                                   |                             |
|-----------------------------------|-----------------------------|
| 1. Dogie Compressor Station North | Unit D, Sec. 04, T25N, R06W |
| 2. Florance #32A                  | Unit F, Sec. 15, T30N, R08W |
| 3. Jacques #2A                    | Unit D, Sec. 25, T30N, R09W |
| 4. Mangum #1E                     | Unit F, Sec. 33, T29N, R11W |
| 5. McClanahan #22                 | Unit G, Sec. 14, T28N, R10W |
| 6. Miles Federal #1E Drip         | Unit N, Sec. 05, T26N, R07W |
| 7. Zachry #18E                    | Unit O, Sec. 11, T28N, R10W |

Ms. Maureen Gannon  
July 14, 1998  
Page 2

B. A review of the ground water quality data for the sites listed below shows that either metals or chlorides and total dissolved solids are present in ground water in excess of WQCC standards at the sites. The OCD requires that PNM determine the extent of these ground water contaminants pursuant to their previously approved ground water investigation plan.

- |    |                        |                             |
|----|------------------------|-----------------------------|
| 1. | Miles Federal #1E Drip | Unit N, Sec. 05, T26N, R07W |
| 2. | Randleman #1           | Unit K, Sec. 13, T31N, R11W |

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

Sincerely,



William C. Olson  
Hydrologist  
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office  
Bill Liess, BLM Farmington District Office

Public Service Company  
of New Mexico  
Alvarado Square MS. 0408  
Albuquerque, NM 87158

April 15, 1997

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



**RE: 1997 SAN JUAN BASIN ANNUAL GROUNDWATER REPORT**

Dear Bill:

PNM is pleased to submit the 1997 Annual 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 reported in this document is provided below.

Cozzens B1  
Florance 32A  
Florance 40  
Florance 44  
Florance 47X  
Florance 124  
Hampton 4M  
Honolulu Loop-Line Drip  
Jacques 2A  
Kaufmann 1  
Mangum 1E  
McClanahan A2E  
McClanahan 22  
McCoy A1A  
Reid 16 Drip  
Templeton 1E  
Zachry 18E

**RECEIVED**

**APR 16 1997**

Environmental Bureau  
Oil Conservation Division

PNM plans to request closure of two of the above sites, the Florance 124 and the Templeton 1E, in our April 30, 1997 filing of the San Juan Pit Closure Reports to the OCD Santa Fe office. We did not report on our newest groundwater site, the Sammons 2, since this was discovered in the second quarter of 1997. If you have any questions regarding the contents of the report, please contact me at (505) 241-2974.

Sincerely,

A handwritten signature in cursive script that reads "Maureen Gannon".

Maureen Gannon  
Project Manager

Attachment

cc: Denver Bearden, PNMGS  
Denny Foust, OCD-Aztec Office  
Robin Prisk, WFS

**PNM 1997 San Juan Basin Groundwater Report  
April 15, 1997**

**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: Jacques 2A

## **Groundwater Site Summary Report**

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

Quarter/Year: 1/97

---

Operator: Amoco  
Sec: 25 Twn: 30N Rng: 9W Unit: D  
Canyon: Pump

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

---

Topo Map: previously submitted  
Well Completion Diagram: Figure 1  
Site Map with Analytical Results: NA  
Groundwater Contour Map: NA  
Groundwater Contour Map: NA  
Hydrograph: NA  
Full-Suite Groundwater Sampling Results: NA  
Analytical Results: NA

### **Activities for First Quarter 1997:**

PNM installed groundwater monitoring wells at the Jacques 2A on January 28, 1997. No other activities were performed during the first quarter of 1997.

### **Results:**

NA

### **Future Actions:**

PNM will commence quarterly monitoring at the Jacques 2A during the second quarter of 1997.

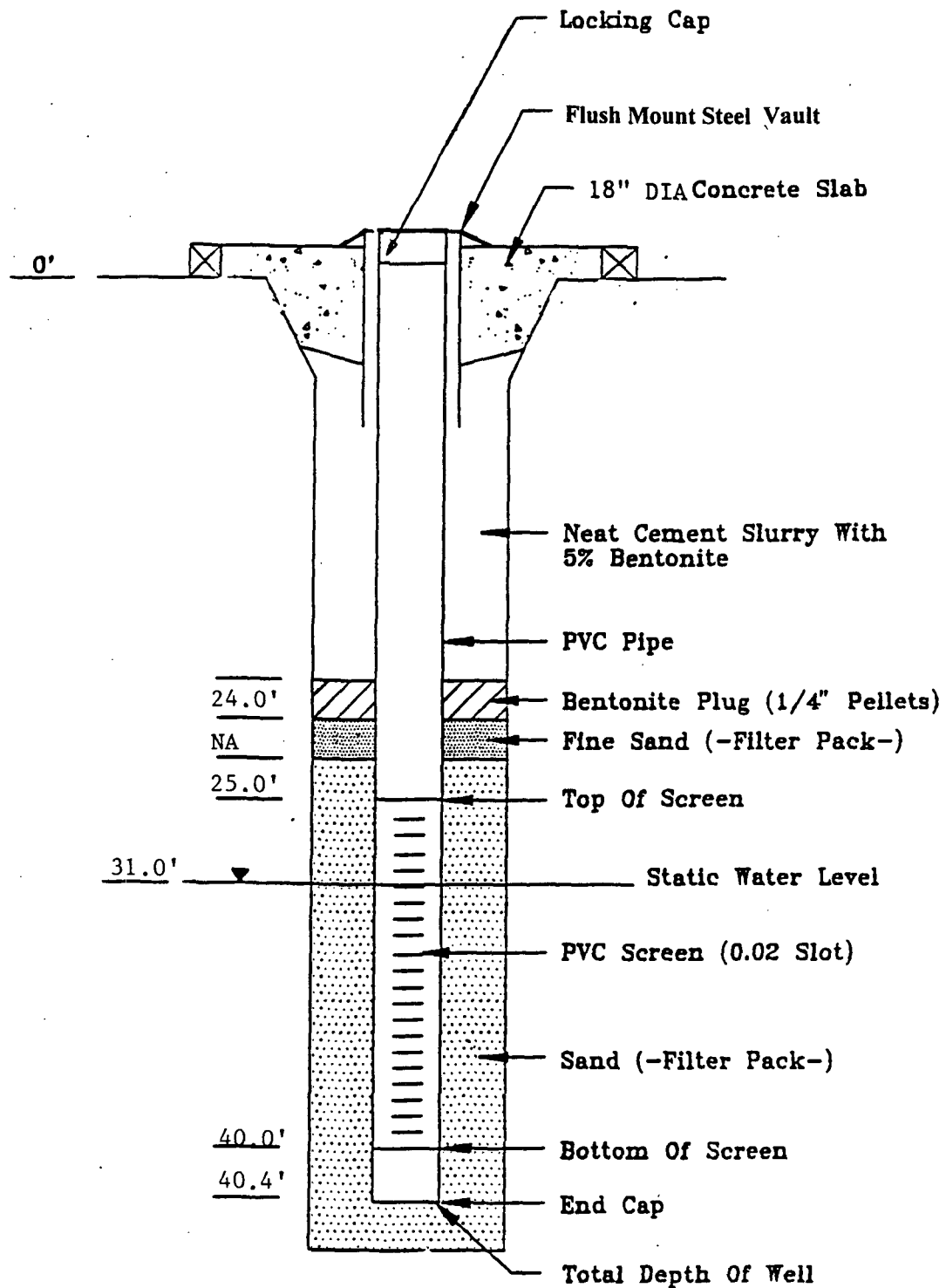
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### **Public Service Company of New Mexico - Gas Services**

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

**Contact: Maureen Gannon**

**Telephone: 505-241-2974**

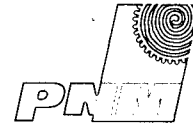
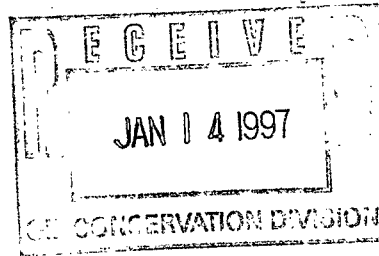


CLIENT: PNM	
DATE:	REV. NO.: 0
AUTHOR: M.D.G.	DRAWN BY: M.P.
CK'D BY: M.D.G.	FILE: DWG

Figure 1  
Well Completion Diagram



Public Service Company  
of New Mexico  
Alvarado Square MS. 0408  
Albuquerque, NM 87158



January 13, 1997

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

**RE: NOTIFICATION OF GROUNDWATER CONTAMINATION AT THE JACQUES 2A 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 Jacques 2A well site, located in section 25, township 30 North, range 9 West, unit letter D. A topographic map showing the location of the site is provided as an attachment. The operator is Amoco. This letter follows verbal notification provided to you on Tuesday, January 7, 1996 (M. Gannon, PNM to B. Olson, OCD).

On December 19, 1996, groundwater was encountered at approximately 30 feet while conducting vertical extent soil boring. A 2-inch, schedule 40, PVC monitoring well with 15 feet of 0.01 inch screen was placed in the annulus 10 feet below and 5 feet above the soil/water interface. The annulus was backfilled with 10-12 silica sand one foot above the screened interval with a one foot bentonite seal. Clean fill material was then backfilled to the surface. After purging three casing volumes, field personnel collected a groundwater sample for BTEX 8020 analysis. The groundwater sample was delivered to Envirotech Labs, in Farmington, New Mexico, for laboratory analysis. A hardcopy of the analytical results is attached. A summary of the analytical results is provided below:

Component	Units	WQCC Stds.	Groundwater Sample
Benzene	ppb	10	<b>1,630</b>
Toluene	ppb	750	<b>6,930</b>
Ethylbenzene	ppb	750	<b>1,100</b>
Xylenes	ppb	620	<b>4,930</b>
<b>Total BTEX</b>	ppb		<b>14,590</b>

**Bold type indicates a WQCC exceedance.**

Jacques 2A  
1/13/97  
Page 2

This letter serves as written notification of groundwater impact at the Jacques 2A. PNM will conduct future activities at the site pursuant to PNM's Groundwater Management Plan. If you have any questions, please call me at (505) 241-2974. Thank you.

Sincerely,  
PNM



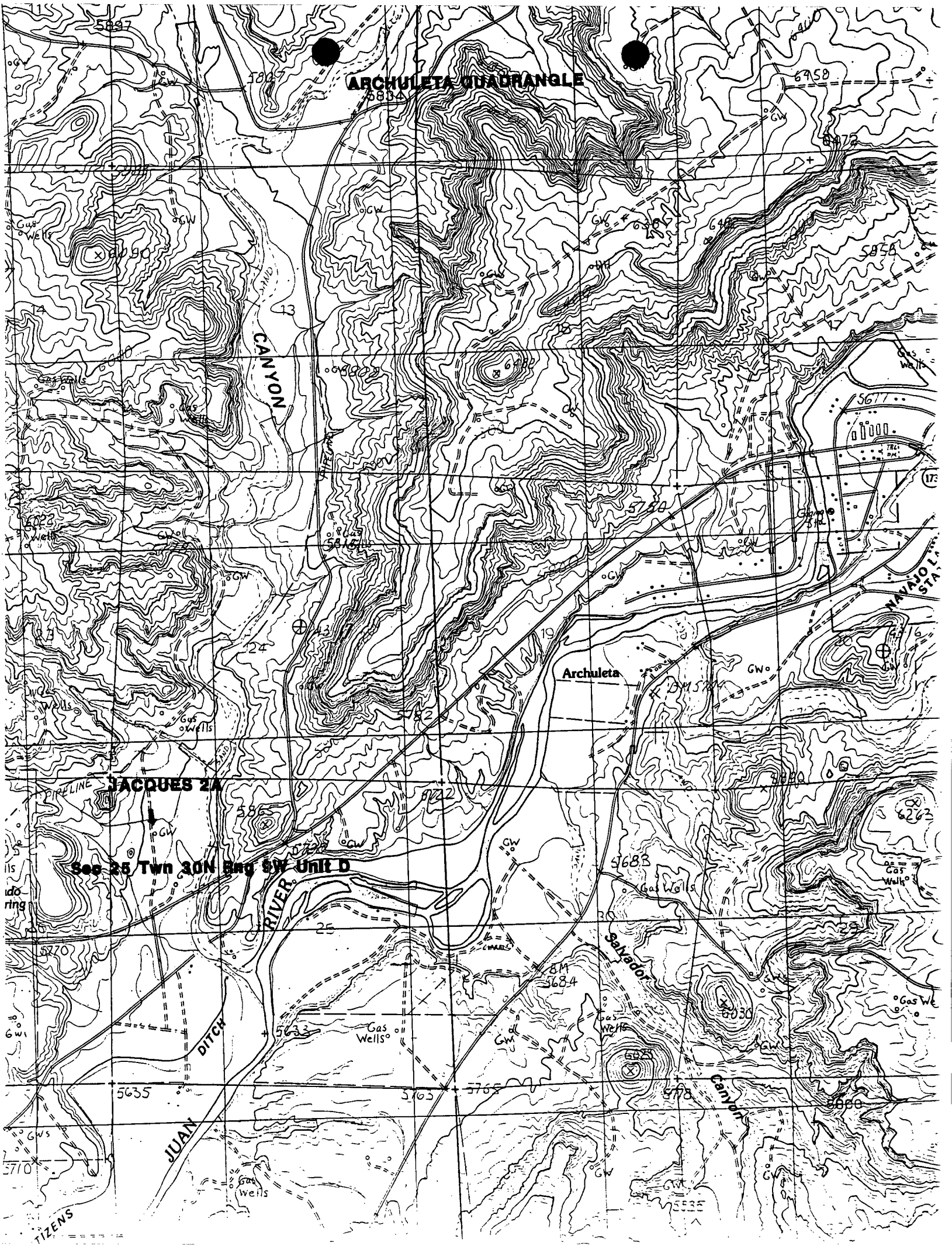
Maureen Gannon  
Project Manager

s/gaspits/jacq2A.doc

Attachment

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

ARCHULETA QUADRANGLE



**ENVIROTECH LABS****PRACTICAL SOLUTIONS FOR A BETTER TOMORROW****EPA METHOD 8020  
AROMATIC VOLATILE ORGANICS**

Client:	Public Service Co. of NM.	Project #:	93108-02
Sample ID:	MW - 1	Date Reported:	12-20-96
Chain of Custody:	5039	Date Sampled:	12-19-96
Laboratory Number:	A850	Date Received:	12-19-96
Sample Matrix:	Water	Date Analyzed:	12-20-96
Preservative:	HgCl <sub>2</sub> & Cool	Analysis Requested:	BTEX
Condition:	Cool & Intact		

Parameter	Concentration (ug/L)	Dilution Factor	Det. Limit (ug/L)
Benzene	1,630	10	1.8
Toluene	6,930	10	1.7
Ethylbenzene	1,100	10	1.5
p,m-Xylene	2,390	10	2.2
o-Xylene	2,540	10	1.0
Total BTEX	14,590		

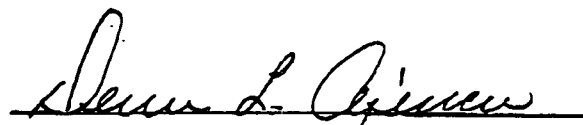
ND - Parameter not detected at the stated detection limit.

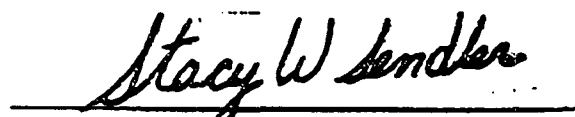
Surrogate Recoveries:	Parameter	Percent Recovery
	Trifluorotoluene	100 %
	Bromofluorobenzene	96 %

References: Method 5030, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, July 1992.

Method 8020, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, Sept. 1994.

Comments: Jaques # 2A.

  
Analyst

  
Review



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

☒ Telephone

☐ Personal

Time 1542

Date 1/7/97

Originating Party

Maureen Cannon - PNM

Other Parties

Bill Olson - Envir. Bureau  
(Voice mail)

Subject

Ground Water Contamination - Hampton #4 N well site  
Jacquez #2A well site

Discussion

Notification of ground water contamination during pit closure activities at:

Hampton #4 N (Burlington well site dchy pit) - unit D sec 13, T30N, R11W  
- depth to water = 28'  
- Benzene = 4000 ppb, BTEX = 20,000 ppb

Jacquez #2A (Amoco well site dchy pit) - unit D sec 25, T30N, R9W  
- depth to water = 30'  
- Benzene = 1600 ppb, BTEX = 15,000 ppb

Conclusions or Agreements

Distribution

files  
Denny Faust - O&D A&T ac

Signed

Bill Olson