3R - 348

# GENERAL CORRESPONDENCE

YEAR(S): 2000 - 1996 Olson, William

From: Sent: m. harvey [SMTP:markh@ditell.com]
Tuesday, September 05, 2000 1:46 PM

To:

Olson, William

Subject:

Annual Groundwater Report (PNM)

As a follow-up to our telephone conversation last week, this serves to acknowledge the extension of time that NMOCD has granted Williams in order to submit the annual groundwater report for former PNM sites.

It is agreed that the report will be submitted by September 15, 2000 and include data from PNM efforts during 1999 and 2000. Williams appreciates the time extension and NMOCD's understanding of the complications associated with inheriting a project of this magnitude.

After submitting the report and allowing review time, Williams intends to schedule a meeting with you to discuss its' plan to effect mitigation of groundwater impacts. Your feedback will be helpful in finalizing a program strategy.

Thank you for your consideration.

From:

Deklau, Ingrid [SMTP:Ingrid.Deklau@Williams.com]

Sent:

Friday, July 07, 2000 1:35 PM

To:

Olson, William

Cc:

'mark'; 'mgannon@pnm.com'

Subject:

**Groundwater Report Extension** 

Per our discussion today, this note is to confirm extension of the Annual Groundwater Report submittal from July 15, 2000 to August 31, 2000.

On March 4, 2000, Maureen Gannon of PNM emailed you and requested the April 1, 2000 deadline for the report submittal be postponed to July 15, 2000 so that PNM could incorporate al information gathered through June 30, 2000 into the report. Since then, PNM and Williams have entered into a Settlement Agreement transferring certain responsibilities to Williams. The responsibility of the preparation of this report is currently under discussion between PNM and Williams. Regardless of the responsibility, it is clear to me that this report will not be ready by the July 15, 2000 deadline.

Thank you for your assistance in this matter.

Ingrid Deklau

307-872-2880

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



### 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 |
| <b>7</b> . | 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

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 Buleau Cil 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

Maureen Gannon

Mauriel Davida

Project Manager

Attachment

cc: Denver Bearden, PNMGS

Denny Foust, OCD-Aztec Office

Leigh Gooding, WFS

3rd Quarter 1996 Groundwater Report Page 2 of 2

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: Zachry 18E

### **Groundwater Site Summary Report**

Copies: WFS(1)

Operator (1)

NMOCD District Office (1) NMOCD Santa Fe (1)

Quarter: 3 Year: 96

Operator: Meridian

Vulnerable Class: Original

Sec: 11 Twn: 28 N Rng: 10 W Unit: O

OCD Ranking: 40

Canyon: Armenta

Lead Agency: NMOCD

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

### **Activities for Quarter:**

PNM reported the Zachry #18E as a groundwater site during this quarter. No other activities were conducted.

### Conclusions and Recommendations:

N/A

### **Further Action:**

During the fourth quarter of 1996, PNM will install and sample groundwater monitoring wells.

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

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

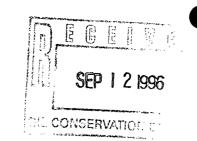
Contact: Maureen Gannon

Telephone: 505-241-2974

PNMGS: 96SUM3.DOC 31-Oct-96

<sup>&</sup>lt;sup>1</sup> See "Notification of Groundwater Contamination at the Zachry 18E Well Site," PNM to OCD, 9/09/96.

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



September 9, 1996

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



### RE: NOTIFICATION OF GROUNDWATER CONTAMINATION AT THE ZACHRY 18E 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 Zachry 18E well site, located in section 11, township 28 North, range 10 West, unit letter O. A topographic map showing the location of the site is provided as an attachment. The operator is Meridian Oil Company. This letter follows verbal notification provided to you on Friday, September 6, 1996 (M. Gannon, PNM to B. Olson, OCD, 9/06/96).

On August 28, 1996, field personnel collected a sample from groundwater in an excavation approximately 10 feet below ground surface. The groundwater sample was delivered to OnSite Technologies, Ltd., in Farmington, New Mexico, for laboratory analysis. A hardcopy of the analytical results are attached. Analytical results are provided below:

| Component    | Units | WQCC Stds. | Pit Excavation Water Sample |
|--------------|-------|------------|-----------------------------|
| Benzene      | ppb   | 10         | 693.5                       |
| Toluene      | ppb   | 750        | 4765.0                      |
| Ethylbenzene | ppb   | 750        | 142.4                       |
| Xylenes      | ppb   | 620        | 4945.3                      |
|              |       |            |                             |

Boldtype indicates a WQCC exceedance.

This letter serves as written notification of groundwater impact at the Zachry 18E. 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

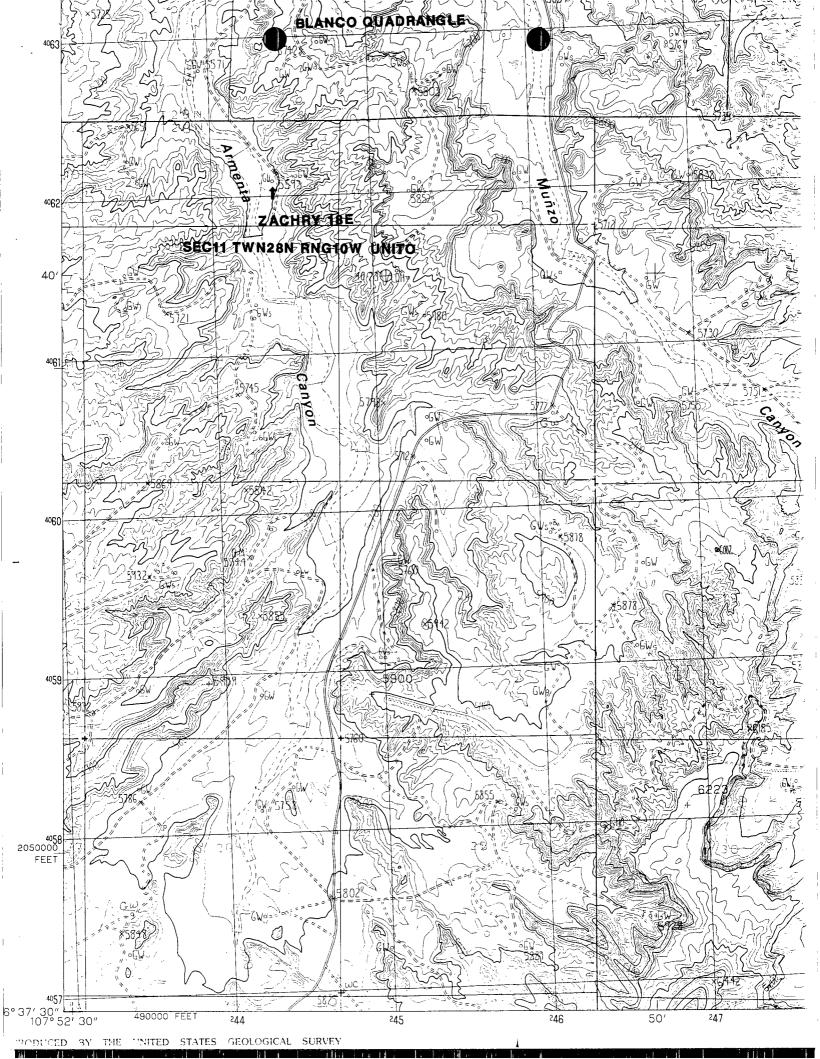
Maureen Gannon Project Manager

MDG/ZACH18E.LTR

Attachment

cc:

Colin Adams, PNM
Denver Bearden, PNMGS
Denny Foust, OCD-Aztec Office
Leigh Gooding, WFS
Toni Ristau, PNM
Craig Boch, Meridian



OFF: (505) 325-5667

LAB: (505) 325-1556

### **QUALITY ASSURANCE REPORT**

for EPA Method 8020

Date Analyzed: 28-Aug-96

Internal QC No.:

0486-QC

Surrogate QC No.:

0488-QC

Reference Standard QC No.:

0417-QC

### Method Blank

|   |        | Unit of |
|---|--------|---------|
| Parameter                               | Result | Measure |
| Average Amount of All Analytes In Blank | <0.2   | ppb     |

### Calibration Check

|              | Unit of | True  | Analyzed |        |       |
|--------------|---------|-------|----------|--------|-------|
| Parameter    | Measure | Value | Value    | % Diff | Limit |
| Benzene      | ppb     | 20.0  | 21.1     | 6      | 15%   |
| Toluene      | ppb     | 20.0  | 21.0     | 5      | 15%   |
| Ethylbenzene | ppb     | 20.0  | 21.3     | 6      | 15%   |
| m,p-Xylene   | ppb     | 40.0  | 41.6     | 4      | 15%   |
| o-Xylene     | ppb     | 20.0  | 20.4     | 2      | 15%   |

### Matrix Spike

|              | 1- Percent | 2 - Percent |           |      |       |
|--------------|------------|-------------|-----------|------|-------|
| Parameter    | Recovered  | Recovered   | Limit     | %RSD | Limit |
| Benzene      | 116        | 110         | (39-150)  | 4    | 20%   |
| Toluene      | 113        | 108         | (46-148)  | 4    | 20%   |
| Ethylbenzene | 110        | 105         | (3.2-160) | 4    | 20%   |
| m,p-Xylene   | 105        | 100         | (35-145)  | 3    | 20%   |
| o-Xylene     | 102        | 97          | (35-145)  | 3    | 20%   |

### Surrogate Recoveries

|                           | \$1       | <i>S2</i> |  |
|---------------------------|-----------|-----------|--|
|                           | Percent   | Percent   |  |
| Laboratory Identification | Recovered | Recovered |  |
| Limit Percent Recovered   | (70-130)  |           |  |
| 11912-4954                | 102       |           |  |
|                           |           |           |  |
|                           |           |           |  |
|                           |           |           |  |
|                           |           |           |  |
|                           |           |           |  |

### S1: Flourobenzene

# **CHAIN OF CUSTODY RECORD**

Date: 8-28-96

age \_\_\_\_of\_\_\_

TECHNOLOGIES, LTD.

657 W. Maple • P. O. Box 2606 • Farmington NM 87499 LAB: (505) 325-5667 • FAX: (505) 325-6256

Date/Time Step/1087 1912-454 Results to be sent LAB ID to both parties. Special Instructions: Date/Time Date/Time Alverado Square, Mail Stop 0408 Telefax No. **ANALYSIS REQUESTED** Title 10 Working Days Albuquerque, NM 87158 **PNM Gas Services** Maureen Gannon 505-848-2974 24-48 Hours Mailing Address City, State, Zip Telephone No. Company Name Date/Time 8-28-36 D857 Received by: Received by: Received by: RESULTS TO Containers 1 Number of MATRIX PRES. 8.28.94 0730 Water 1.1A Date 8-28-96 Dept. 324-3763 Sampling Location: Zeehry 18E; At execution ground TIME Date/Time Date/Time SAMPLE white sampl DATE Curent Signature Must Accompany Request) Job No. City, State, Zip Farmington, NM 87401 PNM Gas Services 603 W. Elm Street Denver Bearden SAMPLE IDENTIFICATION Ray Haston 9608280730 Kirk Purchase Order No.: Method of Shipment Company Address Relinquished by: Name Relinquished by: Relinquished by Authorized by: TO INVOICE SEND Sampler:

Dischibitations with Or Ofto Velleurs I An



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

CONSERVATION OIVISION

### MEMORANDUM OF MEETING OR CONVERSATION

| Telephone           | Personal                   | Time /100                             | Da  | te                                    | 9/6/96         |
|---------------------|----------------------------|---------------------------------------|---|---------------------------------------|----------------|
|                     | Originating Party          | ä                                     | ,   | Oth                                   | er Parties     |
| Maureen G           | ennon - PNM                |                                       | Bill 8  | Bon                                   | - Envir Bureau |
| Subject             |                            |                                       | Unice   | br                                    | r i            |
| · ·                 |                            |                                       |   |                                       |                |
| Zockery             | #18E 61                    | ound Water                            | Continuin   | din                                   | Notice         |
| Discussion          |                            |                                       | <del>, , , , , , , , , , , , , , , , , , , </del> | <del>-</del>                          |                |
| PNM pit             | on Meridian -              | Vallery #18                           | F well  | site                                  |                |
| Location            | - Sec 11                   | T28N,                                 | RIDW  |                                       |                |
| GW dyrth            | - 151                      |                                       |   |                                       |                |
| Bentere             | — 693.5 pgb<br>— 10546 ppk | )<br>/                                |   |                                       |                |
|                     | 10,5 10 ppse               | )                                     |   |                                       |                |
| Conclusions or      | Agreements                 |                                       |   |                                       |                |
|                     |                            | · · · · · · · · · · · · · · · · · · · |   |                                       |                |
|                     |                            |                                       |   |                                       |                |
|                     |                            |                                       |   |                                       |                |
|                     |                            |                                       |   | , , , , , , , , , , , , , , , , , , , | $\sim$         |
| <u>Distribution</u> |                            | Sig                                   | ned Bell  | Q.                                    | Son            |
|                     |                            |                                       |   |                                       |                |