

3R - 214

GEN COR

07/28/2008

Via UPS

July 28, 2008

Mr. Glenn von Gonten
Senior Hydrologist
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**RE: Re-Submittal of Closure Request for Lindrith B #24 Site - January 24, 2006
NMOCD Case No. 3R0214**

Dear Mr. von Gonten:

El Paso Tennessee Pipeline Company (EPTPC), formerly El Paso Field Services, hereby re-submits the Closure Request for Lindrith B #24 Site (NMOCD Case No. 3R0214) dated January 24, 2006. The letter report documents the results of additional site characterization activities conducted in December 2005 at the request of the New Mexico Oil Conservation Division (OCD) and formally requests closure of the site based on the site data obtained and documented.

While reviewing the project file, EPTPC noticed that the OCD case number was not included in the January 24, 2006 correspondence and that the request for site closure was not clearly referenced in either the heading or subject lines. Therefore, EPTPC respectfully re-submits the Lindrith B #24 closure request for your review and consideration.

If you have any comments or questions concerning the attached correspondence, please contact me at (713) 420-5150.

Sincerely,



Doug Stavinoha
Project Manager for
El Paso Tennessee Pipeline Co.

cc: Matt Rhoades – MWH, w / o enclosures
Pit Groundwater Remediation – General File, w / enclosures



Project Name: GW PIT - LINDRITH B-24

File in:

_____ Correspondence: _____
_____ (Agency General, Inter-Office)
_____ Reports
_____ Analytical Data
_____ Other _____

Via Federal Express

January 24, 2006

Mr. Glenn von Gonten
Senior Hydrologist
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Geoprobe Groundwater Samples, Lindrith B #24 Groundwater Site

Dear Mr. von Gonten;

El Paso Tennessee Pipeline Company (EPTPC), formerly El Paso Field Services (EPFS), has prepared this letter in response to New Mexico Oil Conservation Division's (NMOCD) September 6, 2005 approval of the Scope of Work for Lindrith B #24 Groundwater Site (Scope of Work), submitted August 18, 2005. This letter has been developed following the field activities described in the Scope of Work, which were completed on December 13, 2005.

EPTPC originally requested closure of the Lindrith B#24 site on February 4, 2005. This request was denied by NMOCD in a letter dated May 20, 2005, based on two requirements that (1) EPTPC conduct a groundwater investigation to characterize the release from the Lindrith B#24 production pit and (2) that after it has defined the contaminate plume, it demonstrate that it is in compliance with the Water Quality Control Commission (WQCC) abatement standards for eight consecutive quarters. EPTPC responded in a letter on June 23, 2005, in which EPTPC provided additional rationale for the site characterization efforts at the site to date. EPTPC also provided a copy of the 1995 EPFS Workplan with this letter, for which NMOCD approved the use of four consecutive quarters for site closures.

EPTPC submitted the Scope of Work to NMOCD on August 18, 2005, which was approved in a letter from NMOCD dated September 6, 2005. NMOCD approved the Scope of Work and required that a report and recommendations be submitted "no later than 45 days after the geoprobe borings have been installed and sampled." This letter describes the results of the geoprobe groundwater sampling conducted on December 13, 2005 at the Lindrith B #24 site, and EPTPC's recommendation for final closure of this site based on the results contained herein.

Based on discussions with NMOCD, EPTPC proposed to implement a geoprobe investigation at the site to confirm the presence or absence of hydrocarbon contamination in the groundwater to the west of EPTPC's former pit. Based on historic groundwater flow maps, as well as the regional gradient of Largo wash, groundwater flow was expected to be to the southwest; however, there is some indication from original groundwater flow maps that flow may have been to the west as

recently as August 2001 (2001 Groundwater Sites Annual Report). Therefore, the investigation was limited to the area west of the former pit.

The number and locations of the geoprobe borings and associated groundwater samples are shown on the attached Figure 1. These locations are approximately 50-, 100- and 150-feet to the west of the footprint of the former EPTPC pit. The targeted distances from the pit were based on the estimated travel time of groundwater from the former pit since the last time that the groundwater gradient suggested flow in this direction (August 2001), as specified in the approved August 18, 2005 Scope of Work.

Fieldwork:

A geoprobe rig was used to drive borings through the unconsolidated sediments to the depth of first groundwater (estimated approximately 25 to 30 feet below ground). The number and locations of the proposed geoprobe borings and associated groundwater samples are shown on the attached Figure 1. These locations are approximately 50-, 100- and 150-feet to the west of the footprint of the former EPTPC pit. Temporary, PVC well points were placed at the water table for the collection of groundwater samples. Groundwater samples were collected using a peristaltic pump and collected in VOA vials for transport to the analytical laboratory. Samples were stored on ice and shipped to the laboratory within 48 hours of sample collection. All samples were analyzed for BTEX constituents using method EPA 8021B.

Analytical Results and Discussion:

Groundwater samples were collected from three geoprobe locations, listed on Figure 1. Laboratory results are attached, and shown in Table 1. BTEX concentrations at all three locations were well below NMOCD closure standards, with the majority of the detected constituents below the laboratory reporting limits. Historic data and these results are consistent with physical attenuation mechanisms or biodegradation of the hydrocarbons that have resulted in significant reductions of hydrocarbon concentrations inside and outside the source area.

Based on the results of prior activity at the site and this geoprobe investigation, EPTPC believes the extent of contamination at the former pit has been fully characterized and shown to be below NMOCD closure criteria. Therefore, EPTPC formally requests final closure of the Lindrith B #24 site. Please feel free to contact me at 719-520-4761 with any questions or concerns you may have.

Sincerely,



Todd J. Muelhoefer, P.G.
Project Manager
Environmental Remediation
El Paso Corporation

cc: Mr. Denny Foust, NMOCD Aztec District Office
Mr. Bruce Meyerson, Enterprise, Farmington
Mr. Doug Jordan, Enterprise, Houston
Dr. Ted Helfgott, Enterprise, Houston
Dr. Robert Sterrett, EMS
Chandler Cole, MWH
Todd Muelhoefer - General File
Lindrith B 24 file

TABLES

TABLE 1

SUMMARY OF BTEX COMPOUNDS IN GEOPROBE GROUNDWATER SAMPLES
LINDRITH B #24 (METER #94967)

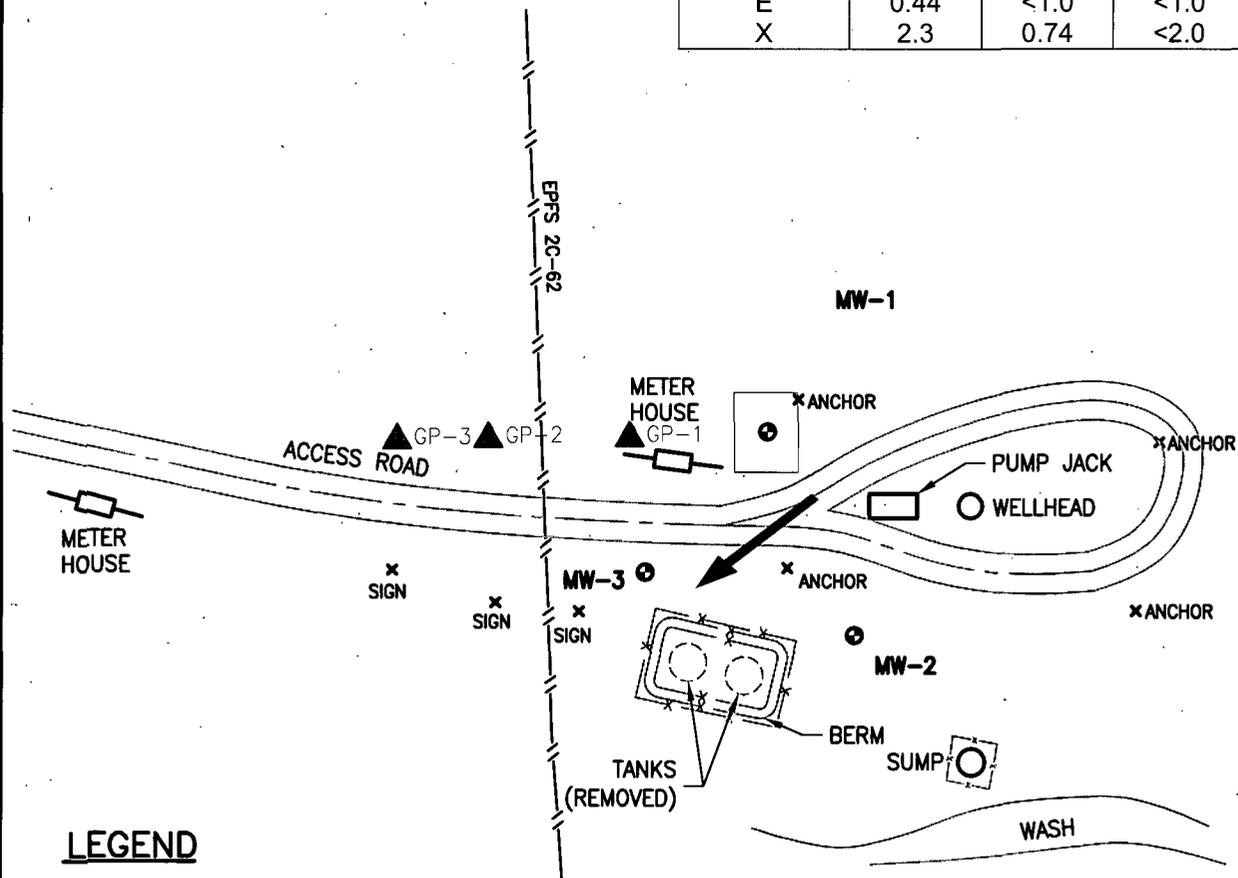
Site Name	Geoprobe Point	Sample Date	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Total Xylenes (ug/L)
Lindrith B #24	GP-1	12/13/2005	0.66	2.3	0.44	2.3
Lindrith B #24	GP-2	12/13/2005	0.43	0.85	< 1.0	0.74
Lindrith B #24	GP-3	12/13/2005	< 1.0	0.83	< 1.0	< 2.0

ug/L: micrograms per liter

< indicates value was not detected, reporting limit shown.

FIGURES

12/13/2005	GP-1	GP-2	GP-3
B	0.66	0.43	<1.0
T	2.3	0.85	0.83
E	0.44	<1.0	<1.0
X	2.3	0.74	<2.0



LEGEND

- MW-1** Approximate Monitoring Well Location and Number
- Centerline of Road
- Fence Line
- Pipe Line
- B** Benzene ($\mu\text{g/L}$)
- T** Toluene ($\mu\text{g/L}$)
- E** Ethylbenzene ($\mu\text{g/L}$)
- X** Total Xylenes ($\mu\text{g/L}$)
- Direction of Groundwater Flow (Estimated from June 2004 Data)
- GP-1** Approximate Geoprobe Location and Number

lindrith24_02.dwg

LINDRITH NO. 24, METER 94967
DECEMBER 2005

GROUNDWATER SITES
EL PASO TENNESSEE PIPELINE COMPANY

FIGURE 1

APPENDIX A



01/12/06

Technical Report for

Montgomery Watson
EPFS San Juan Basin Groundwater Site
D-ALAB-GROUNDREM-004
Accutest Job Number: T12069

Sampling Date: 12/13/05

Report to:

MWH Americas, Inc.
jennifer.a.hurley@mwhglobal.com
ATTN: Ms. Jennifer Hurley

Total number of pages in report: 14



Test results contained within this data package meet the requirements of the National Environmental Laboratory Accreditation Conference and/or state specific certification programs as applicable.

Ron Martino
Ron Martino
Laboratory Manager

This report shall not be reproduced, except in its entirety, without the written approval of Accutest Laboratories.

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Sample Summary

Montgomery Watson

Job No: T12069

EPFS San Juan Basin Groundwater Site
Project No: D-ALAB-GROUNDREM-004

Sample Number	Collected Date	Time By	Received	Matrix Code Type	Client Sample ID
T12069-1	12/13/05	08:46 MN	12/14/05	AQ Ground Water	LINDRITH GP-1
T12069-2	12/13/05	09:13 MN	12/14/05	AQ Ground Water	LINDRITH GP-2
T12069-3	12/13/05	09:30 MN	12/14/05	AQ Ground Water	LINDRITH GP-3

Report of Analysis

Client Sample ID:	LINDRITH GP-1	Date Sampled:	12/13/05
Lab Sample ID:	T12069-1	Date Received:	12/14/05
Matrix:	AQ - Ground Water	Percent Solids:	n/a
Method:	SW846 8021B		
Project:	EPFS San Juan Basin Groundwater Site		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1	KK10279.D	1	12/19/05	JH	n/a	n/a	GKK712
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	0.66	1.0	0.38	ug/l	J
108-88-3	Toluene	2.3	1.0	0.36	ug/l	
100-41-4	Ethylbenzene	0.44	1.0	0.35	ug/l	J
1330-20-7	Xylenes (total)	2.3	2.0	0.72	ug/l	
95-47-6	o-Xylene	0.57	1.0	0.42	ug/l	J
	m,p-Xylene	1.7	2.0	0.72	ug/l	J

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
460-00-4	4-Bromofluorobenzene	96%		56-136%
98-08-8	aaa-Trifluorotoluene	104%		50-144%

ND = Not detected MDL - Method Detection Limit
 RL = Reporting Limit
 E = Indicates value exceeds calibration range

J = Indicates an estimated value
 B = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

2.2
2

Client Sample ID: LINDRITH GP-2	Date Sampled: 12/13/05
Lab Sample ID: T12069-2	Date Received: 12/14/05
Matrix: AQ - Ground Water	Percent Solids: n/a
Method: SW846 8021B	
Project: EPFS San Juan Basin Groundwater Site	

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1 ^a	KK10280.D	1	12/19/05	JH	n/a	n/a	GKK712
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	0.43	1.0	0.38	ug/l	J
108-88-3	Toluene	0.85	1.0	0.36	ug/l	J
100-41-4	Ethylbenzene	ND	1.0	0.35	ug/l	
1330-20-7	Xylenes (total)	0.74	2.0	0.72	ug/l	J
95-47-6	o-Xylene	ND	1.0	0.42	ug/l	
	m,p-Xylene	ND	2.0	0.72	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
460-00-4	4-Bromofluorobenzene	95%		56-136%
98-08-8	aaa-Trifluorotoluene	106%		50-144%

(a) Sample was not preserved to a pH < 2; reported results are considered minimum values.

ND = Not detected MDL - Method Detection Limit
 RL = Reporting Limit
 E = Indicates value exceeds calibration range

J = Indicates an estimated value
 B = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	LINDRITH GP-3	
Lab Sample ID:	T12069-3	Date Sampled: 12/13/05
Matrix:	AQ - Ground Water	Date Received: 12/14/05
Method:	SW846 8021B	Percent Solids: n/a
Project:	EPFS San Juan Basin Groundwater Site	

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1 ^a	KK10281.D	1	12/19/05	JH	n/a	n/a	GKK712
Run #2							

Run #	Purge Volume
Run #1	5.0 ml
Run #2	

Purgeable Aromatics

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	ND	1.0	0.38	ug/l	
108-88-3	Toluene	0.83	1.0	0.36	ug/l	J
100-41-4	Ethylbenzene	ND	1.0	0.35	ug/l	
1330-20-7	Xylenes (total)	ND	2.0	0.72	ug/l	
95-47-6	o-Xylene	ND	1.0	0.42	ug/l	
	m,p-Xylene	ND	2.0	0.72	ug/l	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
460-00-4	4-Bromofluorobenzene	97%		56-136%
98-08-8	aaa-Trifluorotoluene	106%		50-144%

(a) Sample was not preserved to a pH < 2; reported results are considered minimum values.

ND = Not detected MDL - Method Detection Limit
 RL = Reporting Limit
 E = Indicates value exceeds calibration range

J = Indicates an estimated value
 B = Indicates analyte found in associated method blank
 N = Indicates presumptive evidence of a compound



Misc. Forms

Custody Documents and Other Forms

Includes the following where applicable:

- Chain of Custody



VARIANCE MEMO
SAMPLE LOG-IN

SAMPLE(S)
PROJECT
FILED BY:

Trip Blank
Groundwater
AK

DATE 12/14/05
LAB NO. T12069

VARIANCE - Check applicable items(s):

- Insufficient sample sent for proper analysis; _____ received approx. _____
- Sample bottle received broken and/or cap not intact.
- Samples received without paperwork; paperwork received without samples.
- Samples received without proper refrigeration, when it has been deemed necessary. Temperature at receipt: 1.0
- Illegible sample number or label missing from bottle.
- Numbers on sample not the same as numbers on paper work.
- Incomplete instructions received with sample(s) (ie, no request for analysis, no chain of custody, incomplete billing instructions, no due date, etc. Temperature at receipt: _____)
- Samples received in improper container or lacking proper preservation.
- Physical characteristics different than those on sampling sheets;

Describe:

Rush samples on hold because of incomplete paperwork
Other (specify): Trip Blank was rec'd broken.
Majority of the temp blank was frozen.

CORRECTIVE ACTION TAKEN

- Scott Pope Person Contacted By phone.
- Client informed verbally. _____ Samples processed for information only and noted on report.
- Client informed by memo/letter. _____ Samples processed with higher detection limits accepted.
- Samples processed as is. _____ Samples rejected.
- Samples preserved by lab. _____
- Client will resample and resubmit. _____

Notes: Informing client of broken Trip Blank Vials Accu
AK's Rec @ 1.0°

ROUTING

TITLE	DATE	INITIALS	CORRECTED?
Sample Manager:			
Login:	<u>12/14/05</u>	<u>AK</u>	
Project Manager:			
Comments:			

Form SMO05



GC Volatiles

QC Data Summaries

Includes the following where applicable:

- Method Blank Summaries
- Blank Spike Summaries
- Matrix Spike and Duplicate Summaries

Method Blank Summary

Job Number: T12069
 Account: MWHSLCUT Montgomery Watson
 Project: EPFS San Juan Basin Groundwater Site

Sample	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
GKK712-MB	KK10277.D	1	12/19/05	JH	n/a	n/a	GKK712

4.1
4

The QC reported here applies to the following samples:

Method: SW846 8021B

T12069-1, T12069-2, T12069-3

CAS No.	Compound	Result	RL	MDL	Units	Q
71-43-2	Benzene	ND	1.0	0.38	ug/l	
100-41-4	Ethylbenzene	ND	1.0	0.35	ug/l	
108-88-3	Toluene	ND	1.0	0.36	ug/l	
1330-20-7	Xylenes (total)	ND	2.0	0.72	ug/l	
95-47-6	o-Xylene	ND	1.0	0.42	ug/l	
	m,p-Xylene	ND	2.0	0.72	ug/l	

CAS No.	Surrogate Recoveries	Limits
460-00-4	4-Bromofluorobenzene	102% 56-136%
98-08-8	aaa-Trifluorotoluene	106% 50-144%

Blank Spike Summary

Job Number: T12069
 Account: MWHSLCUT Montgomery Watson
 Project: EPFS San Juan Basin Groundwater Site

Sample	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
GKK712-BS	KK10278.D	1	12/19/05	JH	n/a	n/a	GKK712

4.2
4

The QC reported here applies to the following samples:

Method: SW846 8021B

T12069-1, T12069-2, T12069-3

CAS No.	Compound	Spike ug/l	BSP ug/l	BSP %	Limits
71-43-2	Benzene	20	17.9	90	72-125
100-41-4	Ethylbenzene	20	19.1	96	76-125
108-88-3	Toluene	20	18.7	94	74-125
1330-20-7	Xylenes (total)	60	57.6	96	78-124
95-47-6	o-Xylene	20	19.3	97	78-124
	m,p-Xylene	40	38.3	96	78-125

CAS No.	Surrogate Recoveries	BSP	Limits
460-00-4	4-Bromofluorobenzene	94%	56-136%
98-08-8	aaa-Trifluorotoluene	95%	50-144%

Matrix Spike/Matrix Spike Duplicate Summary

Job Number: T12069
 Account: MWHSLCUT Montgomery Watson
 Project: EPFS San Juan Basin Groundwater Site

Sample	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
T12121-1MS	KK10285.D	1	12/19/05	JH	n/a	n/a	GKK712
T12121-1MSD	KK10286.D	1	12/19/05	JH	n/a	n/a	GKK712
T12121-1	KK10284.D	1	12/19/05	JH	n/a	n/a	GKK712

The QC reported here applies to the following samples:

Method: SW846 8021B

T12069-1, T12069-2, T12069-3

CAS No.	Compound	T12121-1 ug/l	Spike Q ug/l	MS ug/l	MS %	MSD ug/l	MSD %	RPD	Limits Rec/RPD
71-43-2	Benzene	160	20	180	100	180	100	0	45-137/21
100-41-4	Ethylbenzene	43.0	20	63.9	105	63.8	104	0	68-126/15
108-88-3	Toluene	49.6	20	69.7	101	69.7	101	0	63-130/22
1330-20-7	Xylenes (total)	267	60	331	107	332	108	0	72-125/19
95-47-6	o-Xylene	73.7	20	95.1	107	95.0	107	0	70-128/20
	m,p-Xylene	193	40	236	108	237	110	0	63-136/19

CAS No.	Surrogate Recoveries	MS	MSD	T12121-1	Limits
460-00-4	4-Bromofluorobenzene	96%	95%	99%	56-136%
98-08-8	aaa-Trifluorotoluene	98%	91%	101%	50-144%

4.3
4