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**ANNUAL
MONITORING
REPORT**

2/28/2009



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February 28, 2009

Mr. Glenn von Gonten
New Mexico Oil Conservation Division (NMOCD)
1220 South St., Francis Drive
Santa Fe, New Mexico 87505

**RE: El Paso Tennessee Pipeline Company Pit Groundwater Remediation Sites
2008 Annual Reports**

Dear Mr. Von Gonten:

MWH Americas, Inc., on behalf of El Paso Tennessee Pipeline Company (EPTPC), is submitting the enclosed 2008 Annual Reports for each of EPTPC's 21 remaining San Juan River Basin pit groundwater remediation Sites. The reports present the 2008 sampling and product recovery data and include recommendations for 2009 activities at these Sites.

The 2008 Annual Reports are divided into three volumes based on location type. The volumes are as follows:

<u>Volume</u>	<u>Location Type</u>
1	Federal Land
2	Non-Federal Land (Excl. Navajo Nation)
3	Navajo Nation

If you have any questions concerning the enclosed reports, please call either Doug Stavinoha of EPTPC (713-420-5150) or me (303-291-2276).

Sincerely,

Jed Smith
Project Manager

encl.

cc: Bill Freeman – NNEPA, Shiprock, NM (Volume 3 Only)
Bill Liese – BLM, Farmington, NM (Volume 1 Only)
Brandon Powell – NMOCD, Aztec, NM (Volumes 1, 2, and 3)
Doug Stavinoha – EPTPC (Volumes 1, 2, and 3)

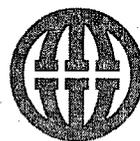
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**2008 ANNUAL GROUNDWATER REPORT
FEDERAL SITES VOLUME I
EL PASO TENNESSEE PIPELINE COMPANY**

TABLE OF CONTENTS

METER or LINE ID	NMOCD CASE NO.	SITE NAME	TOWNSHIP	RANGE	SECTION	UNIT
87640	3RP-155-0	Canada Mesa #2	24N	06W	24	I
89961	3RP-170-0	Fields A#7A	32N	11W	34	E
73220	3RP-068-0	Fogelson 4-1 Com. #14	29N	11W	4	P
89894	3RP-186-0	Hammond #41A	27N	08W	25	O
97213	3RP-190-0	Hamner #9	29N	09W	20	A
94715	3RP-196-0	James F. Bell #1E	30N	13W	10	P
70194	3RP-201-0	Johnston Fed #4	31N	09W	33	H
89232	3RP-202-0	Johnston Fed #6A	31N	09W	35	F
LD072	3RP-204-0	K27 LD072	25N	06W	4	E
LD174	3RP-212-0	LAT L 40	28N	04W	13	H
LD151	3RP-213-0	Lat 0-21 Line Drip	30N	09W	12	O
94810	3RP-223-0	Miles Fed 1A	26N	07W	5	F
89620	3RP-235-0	Sandoval GC A #1A	30N	09W	35	C



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**2008 ANNUAL GROUNDWATER REPORT
NON-FEDERAL SITES VOLUME II
EL PASO TENNESSEE PIPELINE COMPANY**

TABLE OF CONTENTS

METER or LINE ID	NMOCD CASE NO.	SITE NAME	TOWNSHIP	RANGE	SECTION	UNIT
03906	3RP-179-0	GCU Com A #142E	29N	12W	25	G
93388	3RP-192-0	Horton #1E	31N	09W	28	H
LD087	3RP-205-0	K-31 Line Drip	25N	06W	16	N
72556	3RP-207-0	Knight #1	30N	13W	5	A
94967	3RP-214-0	*Lindrith B #24	24N	03W	9	N
70445	3RP-074-0	Standard Oil Com #1	29N	09W	36	N
71669	3RP-239-0	State Gas Com N #1	31N	12W	16	H

* Lindrith B#24 Site was submitted for closure in 2006, and is pending approval from NMOCD. There were no activities for this site in 2008.



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**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Lat L-40
Meter Code: LD174**

SITE DETAILS

Legal Description:	Town: 28N	Range: 4W	Sec: 13	Unit: H
NMOCD Haz Ranking:	20	Land Type: Federal	Operator: Enterprise	

PREVIOUS ACTIVITIES

Site Assessment:	2/95	Excavation:	3/95	Soil Boring:	9/95
Monitor Well:	9/95	Geoprobe:	NA	Additional MWs:	*
Downgradient MWs:	*	Replace MW:	NA	Quarterly Initiated:	NA
ORC Nutrient Injection:	NA	Re-Excavation:	NA	PSH Removal Initiated:	1/98
Annual Initiated:	NA	Quarterly Resumed:	NA	PSH Removal in 2008?	No

* Attempts were made to install additional monitoring wells at this Site during July 2000. All efforts were met with refusal.

SUMMARY OF 2008 ACTIVITIES

MW-1: Annual groundwater sampling (April) and quarterly water level monitoring was performed during 2008.

Site-Wide Activities: No other activities were performed at this Site during 2008.

SITE MAP

A Site map (April) is attached as Figure 1.

SUMMARY TABLES AND GRAPHS

- Historical analytical and water level data are summarized in Table 1 and presented graphically in Figure 2. Where applicable, static water level elevations were corrected for measurable thicknesses of free-product (specific gravity of 0.8).
- Historical free-product recovery data are summarized in Table 2 and presented graphically in Figure 3.
- The 2008 laboratory report is presented in Attachment 1 (included on CD).
- The 2008 field documentation is presented in Attachment 2 (included on CD).

**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Lat L-40
Meter Code: LD174**

GEOLOGIC LOGS AND WELL COMPLETION DIAGRAMS

No subsurface activities were performed at this Site during 2008.

DISPOSITION OF GENERATED WASTES

All purge water was taken to the El Paso Natural Gas Rio Vista Compressor Station.

ISOCONCENTRATION MAPS

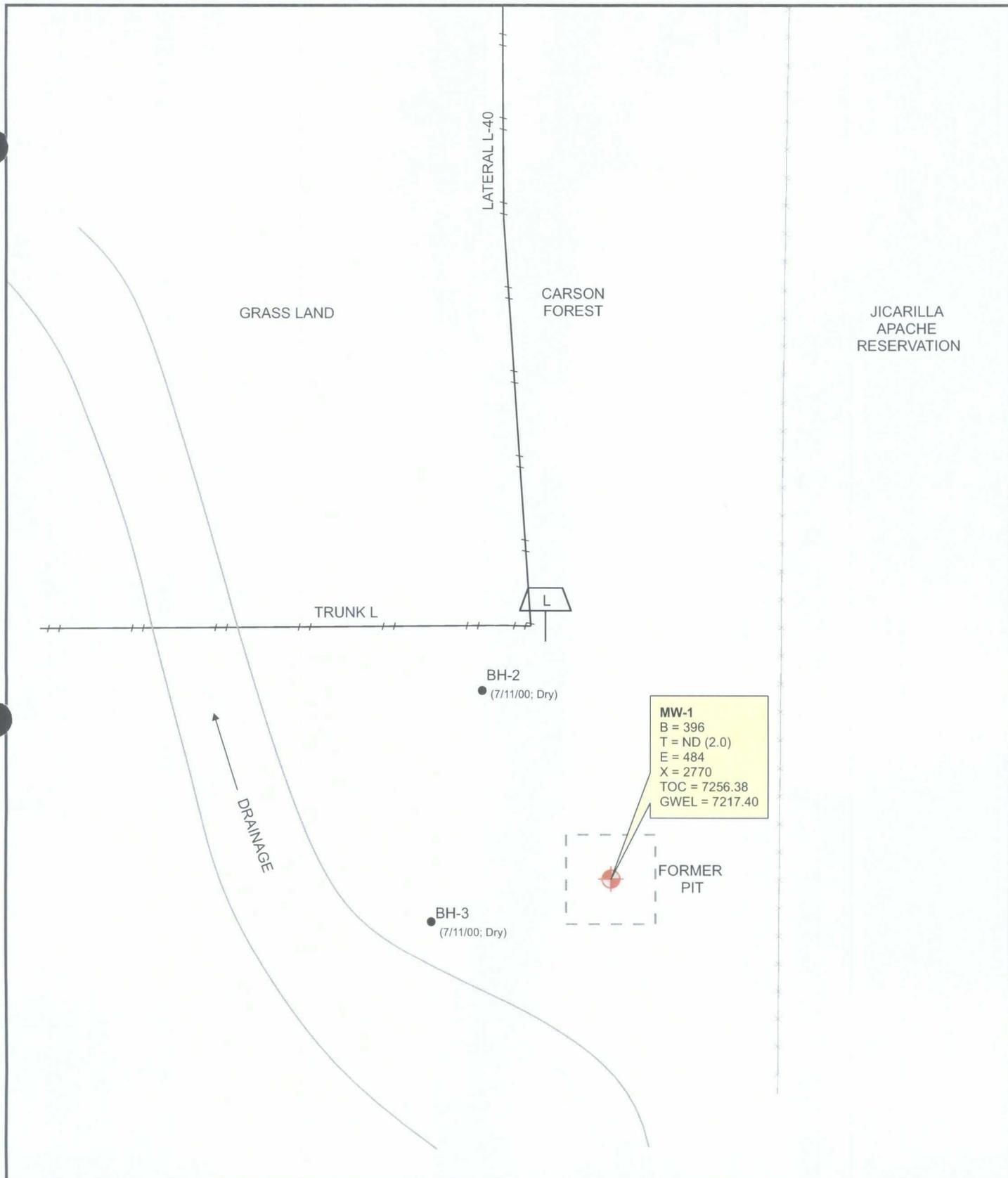
No isoconcentration maps were prepared for this Site; however, the attached Site map presents the water level data collected during 2008.

RESULTS

- Free-product was not observed during the 2008 quarterly water level monitoring events. Free-product was most recently observed in July 2006 (i.e., hydrocarbon had been absorbed into the product recovery sock).
- Monitor well MW-1 was sampled in April 2008, and the benzene and total xylenes concentrations, 396 µg/L and 2,770 µg/L, respectively exceeded their NMWQCC standards. Toluene was not detected; and ethylbenzene was detected at 484 µg/L, which was below its standard of 750 µg/L. The observed BTEX concentrations are well below the highs observed in 1997, prior to the product recovery efforts implemented for this Site.

RECOMMENDATIONS

- EPTPC recommends quarterly water level monitoring to check for product reappearance. If free-product is observed, oil absorbent sock use will be reinitiated.
- Unless product reappears, EPTPC will sample MW-1 on an annual basis until sample results approach closure criteria. Sampling would then proceed at quarterly intervals until the closure criteria are met.



MW-1
 B = 396
 T = ND (2.0)
 E = 484
 X = 2770
 TOC = 7256.38
 GWEL = 7217.40

FORMER PIT

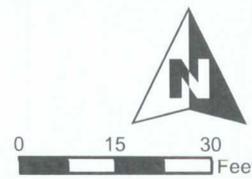
BH-2
 (7/11/00; Dry)

BH-3
 (7/11/00; Dry)

LEGEND

- MW-4 Existing Monitoring / Observation Well
- Groundwater Flow Direction
- 1275- Potentiometric Surface Contour (Inferred Where Dashed)
- ND Not Detected; Reporting Limit Shown In Parenthesis

- B** Benzene (ug/L)
- T** Toluene (ug/L)
- E** Ethylbenzene (ug/L)
- X** Total Xylenes (ug/L)
- TOC** Top of Casing (ft. AMSL)
- GWEL** Groundwater Elevation (ft. AMSL)



PROJECT: LATERAL L-40
 TITLE: Groundwater Potentiometric Surface Map, and BTEX Concentrations - April 17, 2008

FIGURE: 1

FIGURE 2
 SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
 LAT L-40 (METER #LD174)
 MW01

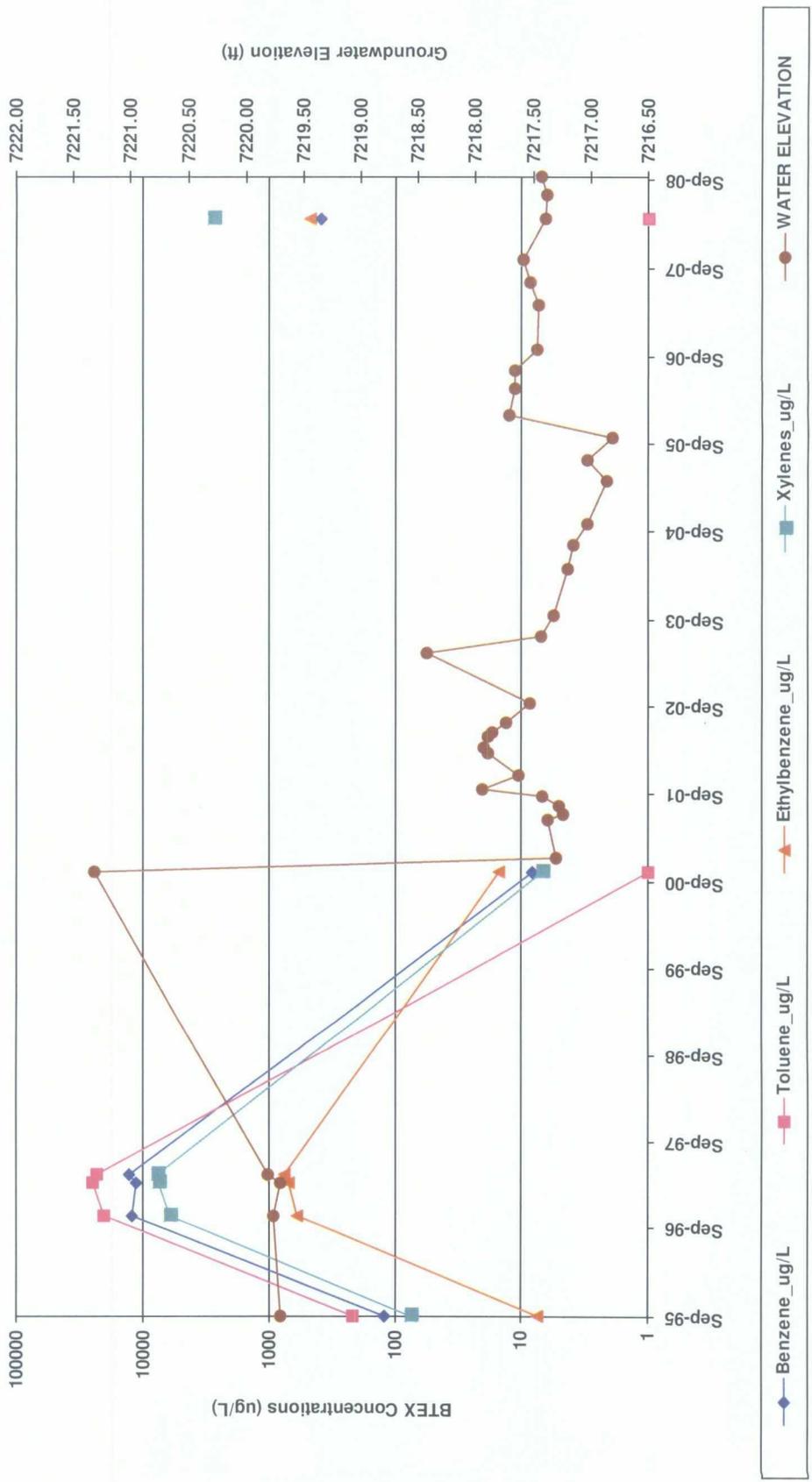


FIGURE 3
 SUMMARY OF FREE-PRODUCT REMOVAL
 LAT L-40 (METER #LD174)
 MW01

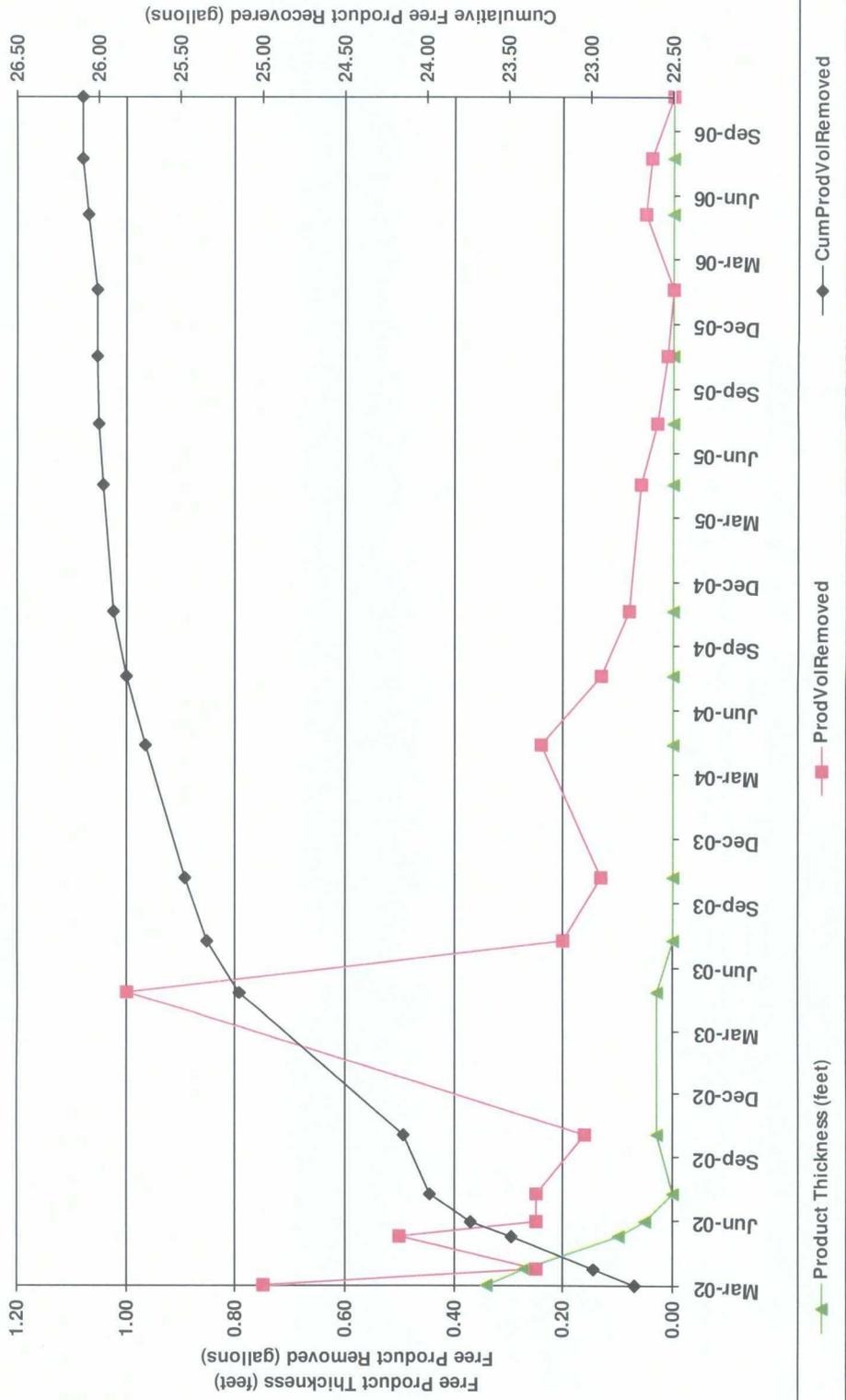


TABLE 1

SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
LAT L-40 (METER #LD174)

Monitoring Well	Sample Date	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Total Xylenes (ug/L)	Depth to Water (ft BTOC)
MW01	9/26/1995	121	218	7.4	75.1	36.68
	11/11/1996	12000	20400	612	6075	36.62
	3/31/1997	11100	24700	702	7440	36.68
	5/9/1997	12900	22900	761	7730	36.57
	11/6/2000	8.2	1	15	6.9	35.06
	4/17/2008	396	1	484	2770	38.98

Note: Non Detects are represented by a value of 1.

TABLE 2

**SUMMARY OF FREE-PRODUCT REMOVAL
LAT L-40 (METER #LD174)**

Monitoring Well	Removal Date	Depth to Product (feet btoc)	Depth to Water (feet btoc)	Product Thickness (feet)	Volume Removed (gallons)	Cumulative Volume of Product Removed (gallons)
MW01	3/12/2002	38.42	38.76	0.34	0.75	22.73
	4/3/2002	38.39	38.66	0.27	0.25	22.98
	5/20/2002	38.46	38.56	0.10	0.50	23.48
	6/10/2002	38.51	38.56	0.05	0.25	23.73
	7/19/2002		38.64	0.00	0.25	23.98
	10/11/2002	38.84	38.87	0.03	0.16	24.14
	5/6/2003	37.94	37.97	0.03	1.00	25.14
	7/17/2003		38.95	0.00	0.20	25.34
	10/13/2003		39.06	0.00	0.13	25.47
	4/20/2004		39.18	0.00	0.24	25.71
	7/27/2004		39.22	0.00	0.13	25.83
	10/26/2004		39.35	0.00	0.08	25.91
	4/22/2005		39.52	0.00	0.06	25.97
	7/19/2005		39.34	0.00	0.03	26.00
	10/21/2005		39.57	0.00	0.01	26.01
	1/24/2006		38.67	0.00	0.00	26.01
	5/10/2006		38.72	0.00	0.05	26.06
	7/26/2006		38.72	0.00	0.04	26.10
10/22/2006		38.91	0.00	0.00	26.10	