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REPORTS

DATE:

6/25/1993

El Paso
Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

June 25, 1993

Mr. William C. Olson
New Mexico Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

Re: Hydrocarbon Contamination Near Jaquez GC C #1
& Jaquez GC E #1, San Juan County, New Mexico

Dear Bill:

By letter dated March 15, 1993, Mr. Denny Foust from your agency threatened an enforcement action, including fines, against El Paso Natural Gas Company ("El Paso") if El Paso does not immediately remediate the hydrocarbon contamination at the site named above. El Paso recognizes that the New Mexico Oil Conservation Division ("OCD") does have the required authority and jurisdiction to make such a demand.

Although El Paso is prepared to initiate and complete remedial action at the site, El Paso's actions should not be construed as a waiver of its rights to contribution from any other responsible party.

Enclosed for your review and approval is El Paso's proposed remedial plan. The plan is supported by the conclusions drawn from the soil and groundwater investigations conducted earlier and does not vary from our discussion on May 18, 1993.

As soon as OCD approves El Paso's plan, El Paso will initiate cleanup activities. If you have any questions or comments regarding the proposed plan, feel free to contact me at 505/599-2141 or David Hall at 915/541-3531.

Sincerely,

Sandra D. Miller
Sr. Environmental Scientist

cc: Mr. Denny Foust, Aztec NMOCD
Mr. David Hall, EPNG
Mr. John Jaquez Jr., Landowner

Jaquez Com. C #1 & Jaquez Com. E #1
Remedial Plan

I. ADDITIONAL INVESTIGATION

a. Complete four shallow hand auger borings south of Citizen's Ditch, along the north fence line of the cornfield. The purpose of this is to confirm the presence or absence of light non-aqueous phase liquid (LNAPL). EPNG will have to have this information prior to beginning remediation activities as it is critical to our remedial methods discussed in section IIIb of this plan.

b. Complete preliminary capture zone modeling, using permeability estimates. These estimates will be based on soil samples collected during the RECON investigation and/or the activity associated with Ia above. This information will help to determine the number and placement of LNAPL recovery wells as discussed in section IIb of this plan.

Note: This work has already been initiated. Items Ia and Ib should be completed the week of June 21.

II. REMEDIATION - METER SITE LOCATION, NORTH OF DITCH

a. Excavate and remove as much contaminated soil as possible from the meter site area. To date, approximately 10 cubic yards have been removed from this area. EPNG anticipates an additional 100-200 cubic yards of contaminated soil to be removed. This will be dependant on maintaining the integrity of Citizen's Ditch and the metering facilities on site. EPNG plans to dispose of the soil at Envirotech's landfarm facility located on Highway 44.

b. In order to recover the LNAPL discovered during the RECON investigation, EPNG will install 4 inch recovery wells along the north side of Citizen's Ditch. The number of wells to be installed will be dependant on the modeling performed per section Ib of this plan. The first well will be installed near PH-9, where free floating product was identified during the investigation. Additional wells will be installed at spacings indicated by the capture zone model, until we reach the edge of the plume. All recovery wells will be equipped with hydrocarbon specific pumps. All recovered product will be collected in tanks and disposed at EPNG's oil water separator facility, located just north of Blanco Plant.

c. For control purposes, install 2, two inch monitor wells. One well will be located outside the plume of contamination to the east, and one outside the plume of contamination to the west.

d. All monitor and recovery wells will be installed so that they intercept the water table. In order to accommodate seasonal fluctuations of the water table, there will be 5 feet of screen above the water and 10 feet of screen below the water. If an impermeable, uncontaminated layer is encountered below the water table, 5 feet of screen may be used instead of ten. It is anticipated that the total depth of these wells will be approximately 30 feet.

III. REMEDIATION - CORNFIELD AREA, SOUTH OF DITCH

a. Excavate and remove as much contaminated soil as possible from the cornfield area. To date, approximately 40 cubic yards have been removed from this area. EPNG anticipates an additional 3000 cubic yards of contaminated soil to be removed. This will be dependant on obtaining landowner approval and maintaining the integrity of Citizen's Ditch. EPNG plans to dispose of the contaminated soil at Envirotech's landfarm facility located on Highway 44. Because of the shallow water table in the cornfield area, water generated during the excavation activities will be pumped into a holding tank and then disposed via EPNG's oil water separator facility located just north of Blanco Plant. Excavated soil will be replaced with a topsoil quality material.

b. Install an interceptor system along the north fence of the cornfield area. The purpose of this is to prevent further migration of the contamination into the agricultural area. Depending on the presence or absence of free floating product in this area (determined from the borings described in section Ia), the system will be per the following scenarios:

1. Absence of floating product - A passive air stripper system. This system will consist of slotted PVC pipe installed in a gravel bed just above the water table. The system will be driven by a series of wind turbines. This type set up will also include a shallow monitor well that will be used to confirm that floating product has not entered the system.

2. Presence of floating product - A series of hydrocarbon specific skimmer pumps installed in either shallow wells or a trench. Product recovered from this system will be handled and disposed as described in section IIb.

In either case, a monitoring system will be designed to confirm that the interceptor system is effectively preventing migration of hydrocarbons into the cornfield area. The monitoring system will include strategically placed monitor well(s), accompanied by a monitoring program that will include monthly groundwater sampling for the first six months, followed by sampling on a quarterly basis.

IV. FURTHER INFORMATION

As information becomes available, EPNG will notify NMOCD of further details of this plan. This information will include the exact number of monitor/recovery wells, the location of each well, and the specific method as outlined in IIIb.