

3R - 318

**GENERAL
CORRESPONDENCE**

YEAR(S):

2003 - 1996



Environmental Project Services
188 County Road 4900
Bloomfield, NM 87413
505-634-4956 Phone
505-327-4577 Fax

May 5, 2003

RECEIVED

MAY 15 2003

ENVIRONMENTAL BUREAU
OF CONSERVATION DIVISION

Mr. William Olson
Hydrologist
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

RE: CASE #3R0318 FLORANCE #124 SEPARATOR/DEHY PIT SAN JUAN COUNTY

Dear Mr. Olson:

This letter and enclosed potentiometric surface map serves as an addendum to the "FLORANCE #124 PIT REMEDIATION AND CLOSURE REPORT" previously submitted to you on January 24, 2003. This addendum is being provided in response to your March 31, 2003 request for a more recent and detailed map depicting the potentiometric surface at the site.

Your March 31, 2003 letter also requested clarification of a comment in the "PIT REMEDIATION AND CLOSURE REPORT" concerning elevated total dissolved solids (TDS) in site ground water. As stated in the report, Public Service Company of New Mexico (PNM) had on April 15, 1997 requested closure of this site based on the contention that area ground water had no beneficial use as demonstrated by TDS levels in BACKGROUND water quality samples exceeding 10,000 mg/l. A copy of the previously submitted PNM report is enclosed for your records. Notwithstanding, there is no historical evidence of any operating practice that would contribute to elevated dissolved solids originating at an unlined dehy impoundment. Because the observed TDS level was representative of naturally occurring or upgradient ground water quality no monitoring of TDS was conducted nor has such monitoring been required as a condition of site closure.

Thank you for your time to review this submittal. If you have any questions regarding this addendum, you may call me at (505) 634-4956.

Respectfully,

Mark B. Harvey
Project Coordinator

cc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Enclosures (2)

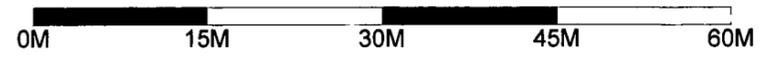
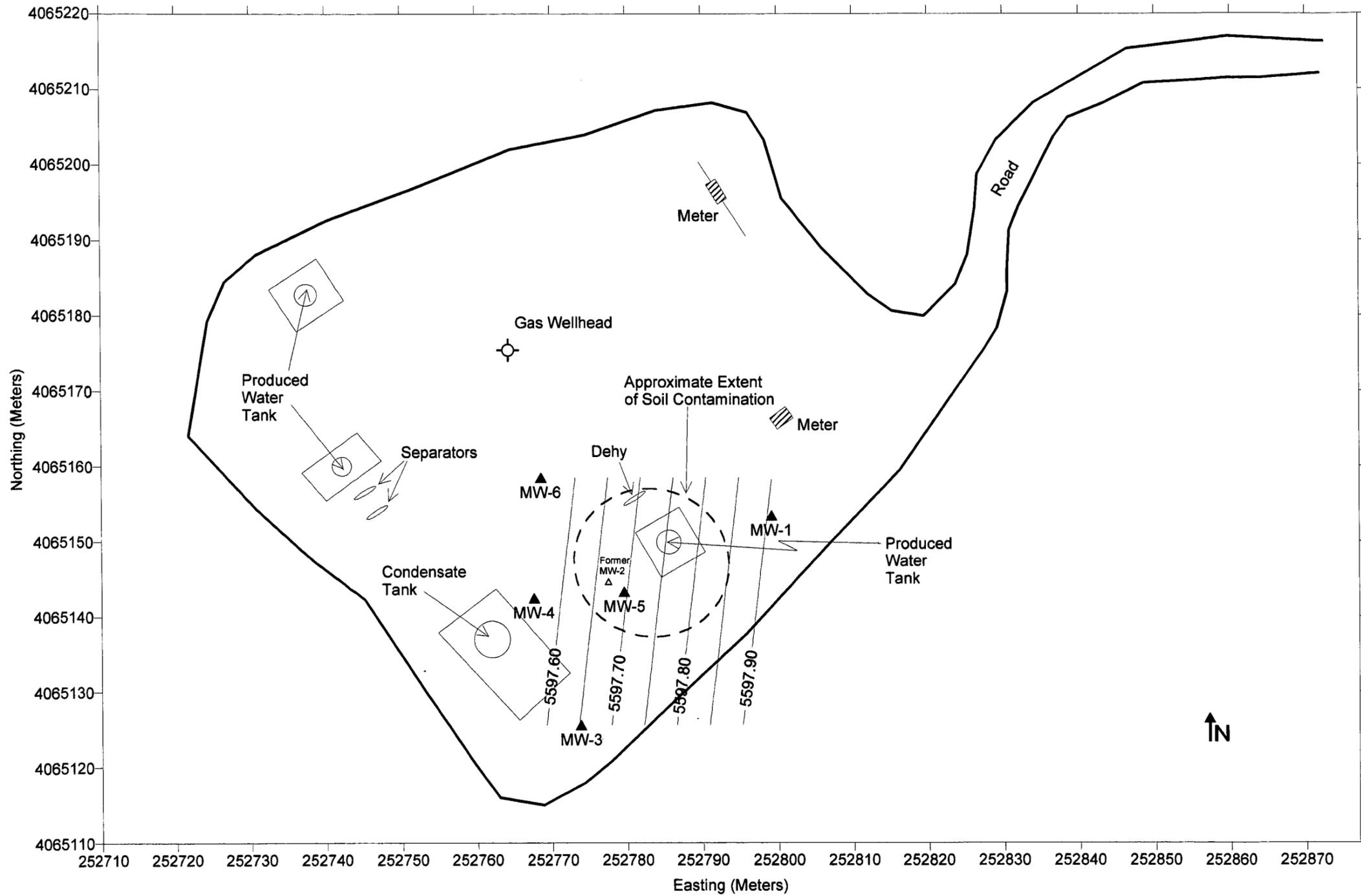


Figure 2
Potentiometric
Surface Map
Florance #124
(October 26, 2001)

LEGEND	
MW-2	Monitoring Well
▲	Monitoring Well
- 5585.20 -	Ground Water Elevation (ft. AMSL)

Groundwater Site Summary Report

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

Quarter/Year: 4/96 & 1/97

Operator: Amoco
Sec: 27 Twn: 29N Rng: 9 W Unit: M
Canyon: Largo

Vulnerable Class: Original
OCD Ranking: 30
Lead Agency: NMOCD

Topo Map: previously submitted
Well Completion Diagram: previously submitted
Full Suite- Groundwater Sampling: previously submitted
Site Map with Groundwater Analysis: Figure 1
Groundwater Contour Map: Figure 2
Groundwater Elevation Graph: Figure 3
Analytical Results: attached

Activities for Previous Two Quarters (Oct. - Dec. 1996 & Jan. - Mar. 1997):

On December 6, 1996, PNM performed quarterly sampling of groundwater monitoring wells at the site. No additional sampling was conducted at the site in the first quarter of 1997 due to the ongoing elevated levels of total dissolved solids (TDS). Water levels were measured at each well. PNM conducted groundwater sampling in each well for chemical analyses of benzene, toluene, ethylbenzene, and xylenes (BTEX). In addition, monitoring wells, MW-1 and MW-2, were sampled for dissolved mercury (Hg) due to a previous laboratory error. Sampling was performed in strict compliance with EPA protocol.

PNM delivered the samples to OnSite Technologies, Farmington, New Mexico. The samples were analyzed using the following methods: BTEX using EPA Method 8020, major cations/anions using various EPA methods, and atomic absorption spectroscopy (AAS) for Hg.

Results:

Figure 1 provides a site map showing benzene, toluene, ethylbenzene and xylenes (BTEX) and total dissolved solids (TDS) analytical data for each monitoring well since groundwater contamination was discovered. All wells at the site continue to show extremely high concentrations of total dissolved solids (TDS), between 18938 mg/l and 28856 mg/l. BTEX concentrations are decreasing in MW-2, the only contaminated well on location. Mercury (Hg) was non-detect in MW-1 and MW-2 (see attached analytical results).

Figure 2 provides a groundwater contour map of the site for the fourth quarter of 1996. The groundwater flow direction is southwesterly beneath the site as was previously determined in September of 1996. Figure 3 presents a groundwater hydrograph of the site since monitoring began. In each well, the groundwater level decreased between September and December of 1996.

Further Action:

PNM requests closure of the Florance 124. This request is based upon the high concentrations of TDS in the groundwater at the Florance 124. We believe the elevated TDS levels are indicative of the groundwater in this local area and have chosen not to drill a new up-gradient well. MW-1 lies 75 feet up-gradient of the former pit area and serves as a good background well for the site. After two quarters of monitoring, TDS levels remain above 10,000 mg/l; therefore, PNM believes the groundwater has no beneficial use in the future. Upon completion of monitoring and remedial actions, PNM will plug and abandon the four groundwater monitoring wells at the Florance 124. The concrete pad and the metal vault surrounding each well will be removed. The well casing will be cut to ground surface and each well will be plugged to the surface with cement containing 5% bentonite.

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



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

March 31, 2003

Mr. Mark B. Harvey
Williams Field Services
188 County Rd. 4900
Bloomfield, New Mexico 87413

**RE: CASE #3R0318
FLORANCE #124 SEPARATOR/DEHY PIT
SAN JUAN COUNTY, NEW MEXICO**

Dear Mr. Harvey:

The New Mexico Oil Conservation Division (OCD) has reviewed Williams Field Services' (WFS) January 24, 2003 "FLORANCE #124 PIT REMEDIATION AND CLOSURE REPORT". This document contains the results of WFS's soil and ground water remediation activities for an unlined pit at the Florance #124 separator/dehy pit site located in Unit C, Sec. 27, T29N, R09W, San Juan County, New Mexico. The document requests closure approval of the site remedial actions.

The above-referenced report does not contain any recent ground water potentiometric maps for the site. The ground water potentiometric map provided is from a December 1996 PNM sampling event. OCD's approval of the ground water remediation and monitoring plan required a ground water potentiometric map be prepared for each sampling event. The maps are to show the monitoring well locations in relation to the former pit and the direction and magnitude of the hydraulic gradient. The report also does not contain information on the ground water monitoring of total dissolved solids (TDS) at the site, nor does the report address the high TDS concentrations in the site ground water monitoring wells. The OCD cannot complete a review of the closure request for the Florance #124 site until WFS submits the above information.

A review of WFS's last annual report on ground water sites in the San Juan Basin shows that the reports for each site also do not include the ground water potentiometric maps discussed above. In addition, some sites reference phase separated product (PSH) recovery activities, but do not contain information for each sampling event on the thickness of PSH in site ground water monitoring wells nor the amount of product recovered. Please include this information in all subsequent annual reports.

If you have any questions, please contact me at (505) 476-3491.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Olson". The signature is fluid and cursive, with the first name being the most prominent.

William C. Olson
Hydrologist
Environmental Bureau

cc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Mike Lane, Williams Field Services



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

April 7, 1998

Ms. Maureen Gannon
PNM
Alvarado Square, MS 0408
Albuquerque, New Mexico 87158

**RE: GROUND WATER ANALYSES
FLORANCE 124 WELL SITE**

Dear Ms. Gannon:

Enclosed are the New Mexico Oil Conservation Division's (OCD) ground water analyses from the Florance 124 well site that the OCD split with PNM on November 19, 1997.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Will Olson".

William C. Olson
Hydrologist
Environmental Bureau

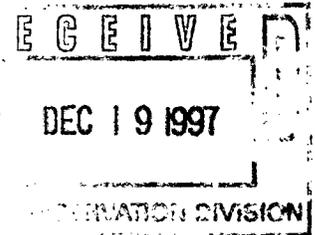
xc: Denny Foust, OCD Aztec District Office

American Environmental Network, Inc.

AEN I.D. 711338

December 18, 1997

NM Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505



Project Name/Number: FLORENCE 124

Attention: Bill Olson

On 11/19/97, American Environmental Network (NM) Inc., (ADHS License No. AZ0015), received a request to analyze **aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

All analyses were performed by American Environmental Network (AZ) Inc., 9830 S. 51st Street, Suite B-113, Phoenix, AZ.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.


H. Mitchell Rubenstein, Ph.D.
General Manager

MR:jt

Enclosure

American Environmental Network, Inc.

CLIENT : NMOCD DATE RECEIVED : 11/19/97
PROJECT # : FLORENCE 124
PROJECT NAME : FLORENCE 124 REPORT DATE : 12/18/97

AEN ID: 711338

	AEN ID #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	711338-01	9711191030	AQUEOUS	11/19/97

---TOTALS---

<u>MATRIX</u>	<u>#SAMPLES</u>
AQUEOUS	1

AEN STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.'

American Environmental Network, Inc.

AEN I.D. 711274

December 17, 1997

American Environmental Network-NM
2709-D Pan American Frwy, NE
Albuquerque, NM 87107

Project Name/Number: NMOCD/711338

Attention: Kimberly D. McNeill

On 11/20/97, American Environmental Network (Arizona), Inc., received a request to analyze aqueous sample(s). The sample(s) were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

If you have any questions or comments, please do not hesitate to contact us at (602) 496-4400.



Marcia A. Smith
Project Manager
MS/acc
Enclosure

ADHS License No. AZ0061
Alan Kleinschmidt, Regional General Manager

American Environmental Network, Inc.

CLIENT : AMERICAN ENV. NETWORK OF NM, INC. DATE RECEIVED : 11/20/97
PROJECT # : 711338
PROJECT NAME : NMOCD REPORT DATE : 12/17/97
ATI I.D. : 711274

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	711338-01	AQUEOUS	11/19/97

----- TOTALS -----

MATRIX	# SAMPLES
AQUEOUS	1

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

American Environmental Network, Inc.

GENERAL CHEMISTRY RESULTS

ATI I.D. : 711274

CLIENT : AMERICAN ENV. NETWORK OF NM, INC.
PROJECT # : 711338
PROJECT NAME : NMOCD

DATE RECEIVED : 11/20/97

REPORT DATE : 12/17/97

PARAMETER	UNITS	01
CARBONATE (CACO3)	MG/L	<1
BICARBONATE (CACO3)	MG/L	359
HYDROXIDE (CACO3)	MG/L	<1
TOTAL ALKALINITY (AS CACO3)	MG/L	359
BROMIDE (EPA 300.0)	MG/L	<0.6
CHLORIDE (EPA 325.2)	MG/L	24
CONDUCTIVITY, (UMHOS/CM)		5180
FLUORIDE (EPA 340.2)	MG/L	2.00
PH (EPA 150.1)	UNITS	7.5
SULFATE (EPA 375.2)	MG/L	2900
T. DISSOLVED SOLIDS (160.1)	MG/L	4130

American Environmental Network, Inc.

GENERAL CHEMISTRY - QUALITY CONTROL

CLIENT : AMERICAN ENV. NETWORK OF NM, INC.
 PROJECT # : 711338
 PROJECT NAME : NMOCD

ATI I.D. : 711274

PARAMETER	UNITS	ATI I.D.	SAMPLE RESULT	DUP. RESULT	RPD	SPIKED SAMPLE	SPIKE CONC	% REC
CARBONATE	MG/L	71138901	<1	<1	NA	NA	NA	NA
BICARBONATE	MG/L		132	130	2	NA	NA	NA
HYDROXIDE	MG/L		<1	<1	NA	NA	NA	NA
TOTAL ALKALINITY	MG/L		132	130	2	NA	NA	NA
BROMIDE	MG/L	71117001	<0.3	<0.3	NA	1.3	1.0	130
CHLORIDE	MG/L	71114601	290	290	0	550	250	104
CONDUCTIVITY (UMHOS/CM)		71140003	1060	1060	0	NA	NA	NA
FLUORIDE	MG/L	71299902	3.85	4.00	4	9.13	5.00	106
PH	UNITS	71124301	7.4	7.4	0	NA	NA	NA
SULFATE	MG/L	71124402	660	680	3	980	400	80
TOTAL DISSOLVED SOLIDS	MG/L	71131502	1050	1080	3	NA	NA	NA

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

American Environmental Network, Inc.

METALS RESULTS

ATI I.D. : 711274

CLIENT : AMERICAN ENV. NETWORK OF NM, INC.
PROJECT # : 711338
PROJECT NAME : NMOCD

DATE RECEIVED : 11/20/97

REPORT DATE : 12/17/97

PARAMETER	UNITS	01
CALCIUM (EPA 200.7/6010)	MG/L	223
POTASSIUM (EPA 200.7/6010)	MG/L	4.9
MAGNESIUM (EPA 200.7/6010)	MG/L	20.5
SODIUM (EPA 200.7/6010)	MG/L	1090

American Environmental Network, Inc.

METALS - QUALITY CONTROL

CLIENT : AMERICAN ENV. NETWORK OF NM, INC.
 PROJECT # : 711338
 PROJECT NAME : NMOCD

ATI I.D. : 711274

PARAMETER	UNITS	ATI I.D.	SAMPLE RESULT	DUP. RESULT	RPD	SPIKED SAMPLE CONC	SPIKE CONC	% REC
CALCIUM	MG/L	71299911	69.5	68.8	1	117	50.0	95
POTASSIUM	MG/L	71299911	1.3	1.2	8	53.6	50.0	105
MAGNESIUM	MG/L	71299911	21.4	21.5	0.5	46.0	25.0	98
SODIUM	MG/L	71299911	529	526	0.6	1730	1250	96

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

DATE OF ANALYSIS REPORT

AEN ID: 711274

17-Dec-97

METHOD	SAMPLE #	DATE	ANALYST
ALKALINITY (EPA 310.1)	01	12/01/97	MARLA WILSON
BROMIDE (EPA 300.0)	01	12/02/97	MARLA WILSON
CALCIUM (EPA 200.7/6010)	01	12/09/97	JACKIE L. CLEMENT
CHLORIDE (EPA 325.2)	01	11/26/97	CARLENE MCCUTCHEON
CONDUCTIVITY, (UMHOS/CM)	01	12/01/97	PAUL STRICKLER
FLUORIDE (EPA 340.2)	01	11/25/97	DIPTI A. SHAH
MAGNESIUM (EPA 200.7/6010)	01	12/09/97	JACKIE L. CLEMENT
PH (EPA 150.1)	01	11/20/97	DIPTI A. SHAH
POTASSIUM (EPA 200.7/6010)	01	12/09/97	JACKIE L. CLEMENT
SODIUM (EPA 200.7/6010)	01	12/09/97	JACKIE L. CLEMENT
SULFATE (EPA 375.2)	01	12/06/97	CARLENE MCCUTCHEON
T. DISSOLVED SOLIDS (160.1)	01	11/24/97	DIPTI A. SHAH

Methods for Chemical Analysis of Water and Wastes, EPA-600 4-79-020, March 1983

Methods for the Determination of Inorganic Substances in Environmental Samples, EPA-600-R-93/100

American Environmental Network, Inc.

DATE: 12-17-97

ION BALANCE

AEN ACCESSION NUMBER: 71127401
 SAMPLE IDENTIFICATION: 711338-01
 CLIENT: AMERICAN ENVIRONMENTAL NETWORK OF NM

ANIONS	RESULT MG/L	FACTOR ME/L	TOTAL
ALKALINITY (AS CaCO ₃)	359.000	0.02000	7.18000
CHLORIDE	24.000	0.02821	0.67704
FLUORIDE	2.000	0.05264	0.10528
NITRATE AS N (NO ₃ (NO ₃ -N X 4.43)	NA	0.01613	0.00000
SiO ₃ (SILICON X 2.71)	NA	0.02629	0.00000
SULFATE	2900.000	0.02082	60.37800

TOTAL ANIONS 68.34032

CATIONS	RESULT	FACTOR	TOTAL
CALCIUM	223.000	0.04990	11.1277
POTASSIUM	4.900	0.02558	0.12534
MAGNESIUM	20.500	0.08229	1.68695
SODIUM	1090.000	0.04350	47.41500

TOTAL CATIONS 60.35499

%RPD (<10%)* 12.41

TOTAL ANIONS/CATIONS	(CALCULATED)	4479.800		
TOTAL DISSOLVED SOLIDS	(ANALYZED)	4130	%RPD (<15%)*	8.13
ELECTRICAL COND.		5180	TDS/EC RATIO (0.65+/-0.10)	0.80

* If either Total Cations or Total Anions <10, then the %RPD Limit is not applicable.

CHAIN OF CUSTODY

DATE: 11-19-97 PAGE: OF 1

AEN LAB ID: 711358

SAMPLE REAS: (USE ONLY)

PROJECT MANAGER: Bill Olson

COMPANY: NM. Oil Conservation Division

ADDRESS: 2040 South Pacheco
Sante Fe, NM 87505

PHONE: (505) 827-7154

FAX: (505) 827-8177

BILL TO: Same

COMPANY:

ADDRESS:

ANALYSIS REQUEST	
Petroleum Hydrocarbons (418.1) TRPH (MOD.8015) Diesel/Direct/Inject	
(M8015) Gas/Purge & Trap Gasoline/BTEX & MTBE (M8015/8020)	
BTXE/MTBE (8020)	
BTEX & Chlorinated Aromatics (602/8020)	
BTEX/MTBE/EDC & EDB (8020/8010/Short)	
Chlorinated Hydrocarbons (601/8010)	
504 EDB <input type="checkbox"/> / DBCP <input type="checkbox"/>	
Polynuclear Aromatics (610/8310)	
Volatile Organics (624/8240) GC/MS	
Volatile Organics (8260) GC/MS	
Pesticides/PCB (608/8080)	
Herbicides (615/8150)	
Base/Neutral/Acid Compounds GC/MS (625/8270)	
General Chemistry: custom/analysis	2
Priority Pollutant Metals (13)	
Target Analyte List Metals (23)	
RCRA Metals (8)	
RCRA Metals by TCLP (Method 1311) Metals:	

SAMPLE ID	DATE	TIME	MATRIX	LAB I.D.
9711191030	11/19/97	1030	Water	-01

PLEASE FILL THIS FORM IN COMPLETELY.

PROJECT INFORMATION		PRIOR AUTHORIZATION IS REQUIRED FOR RUSH PROJECTS		RELINQUISHED BY:		RELINQUISHED BY:	
PROJ. NO.: Florence 124	(RUSH) <input type="checkbox"/> 24hr <input type="checkbox"/> 48hr <input type="checkbox"/> 72hr <input type="checkbox"/> 1 WEEK	(NORMAL) <input checked="" type="checkbox"/>		Signature: <i>William Olson</i>	Time: 1545	Signature:	Time:
PROJ. NAME: Florence 124	CERTIFICATION REQUIRED: <input type="checkbox"/> NM <input type="checkbox"/> SDWA <input type="checkbox"/> OTHER			Printed Name: William Olson	Date: 11/19/97	Printed Name:	Date:
P.O. NO.:	METHANOL PRESERVATION <input type="checkbox"/>			Company: NMOC		Company:	
SHIPPED VIA:	COMMENTS: FIXED FEE <input type="checkbox"/>			Signature:	Time:	Signature:	Time:
				Printed Name:	Date:	Printed Name:	Date:
				Company:		Company:	

COMMONLY REQUESTED GENERAL CHEMISTRY

<u>ABV.</u>	<u>ANALYSES</u>
ALK	Alkalinity (Bicarbonate+Carbonate)
NH4	Ammonia
BOD	Biochemical Oxygen Demand
BR	Bromide
Cl	Chloride
COD	Chemical Oxygen Demand
E.C.	Conductivity
CN	Cyanide, Total
F	Fluoride
N03	Nitrate
N02/N03	Nitrite/Nitrate
N02	Nitrite
TKN	Total Kjaidahl Nitrogen
O-G	Oil-Grease
PH	PH
TDS	Total Dissolved Solids
TSS	Total Suspended Solids
S04	Sulfate
S-2	Sulfide
TOC	Total Organic Carbon
TOX	Total Organic Halide

METALS COMMONLY ANALYZED PRIORITY POLLUTANT LIST (PP) • RCRA • TARGET ANALYTE LIST (TAL)

<u>NAME</u>	<u>SYMBOL</u>	<u>LIST</u>
Aluminum	Al	TAL
Antimony	Sb	PP,TAL
Arsenic	As	RCRA, PP, TAL
Barium	Ba	RCRA, TAL
Beryllium	Be	PP,TAL
Bismuth	Bi	
Boron	B	
Cadmium	Cd	RCRA, PP, TAL
Calcium	Ca	TAL
Chromium	Cr	RCRA, PP, TAL
Cobalt	Co	TAL
Copper	Cu	PP, TAL
Gold	Au	
Iron	Fe	TAL
Lead	Pb	RCRA, PP, TAL
Lithium	Li	
Magnesium	Mg	TAL
Manganese	Mn	TAL
Mercury	Hg	RCRA, PP, TAL
Molybdenum	Mo	
Nickel	Ni	PP, TAL
Potassium	K	TAL
Selenium	Se	RCRA, PP, TAL
Silicon	Si	
Silver	Ag	RCRA, PP, TAL
Sodium	Na	TAL
Strontium	Sr	
Sulfur	S	
Thallium	Tl	PP, TAL
Tin	Sn	
Titanium	Ti	
Uranium	U	
Vanadium	V	TAL
Zinc	Zn	PP, TAL

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

RECEIVED

AUG 19 1996

August 15, 1996

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

Environmental Bureau
Oil Conservation Division



RE: NOTIFICATION OF GROUNDWATER CONTAMINATION AT THE FLORENCE 124 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 Florence 124 well site, located section 27, township 9 W, range 29 North, unit letter C. A topographic map showing the location of the site is provided as an attachment. The operator is Amoco Oil Company. This letter follows verbal notification provided to you on Monday, August 12, 1996 (M. Gannon, PNM to B. Olson. OCD, 8/12/96).

On August 2, 1996, field personnel collected a sample from groundwater in an excavation approximately 12 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	2214.6
Toluene	ppb	750	7397.7
Ethylbenzene	ppb	750	297.1
Xylenes	ppb	620	4033.8

Boldtype indicates a WQCC exceedance.

This letter serves as written notification of groundwater impact at the Florence 124. PNM will conduct future activities at the site pursuant to PNM's Groundwater Management Plan. If you have any questions, please call me at 241-2974. Thank you.

Sincerely,
PNM

Handwritten signature of Maureen Gannon in cursive script.

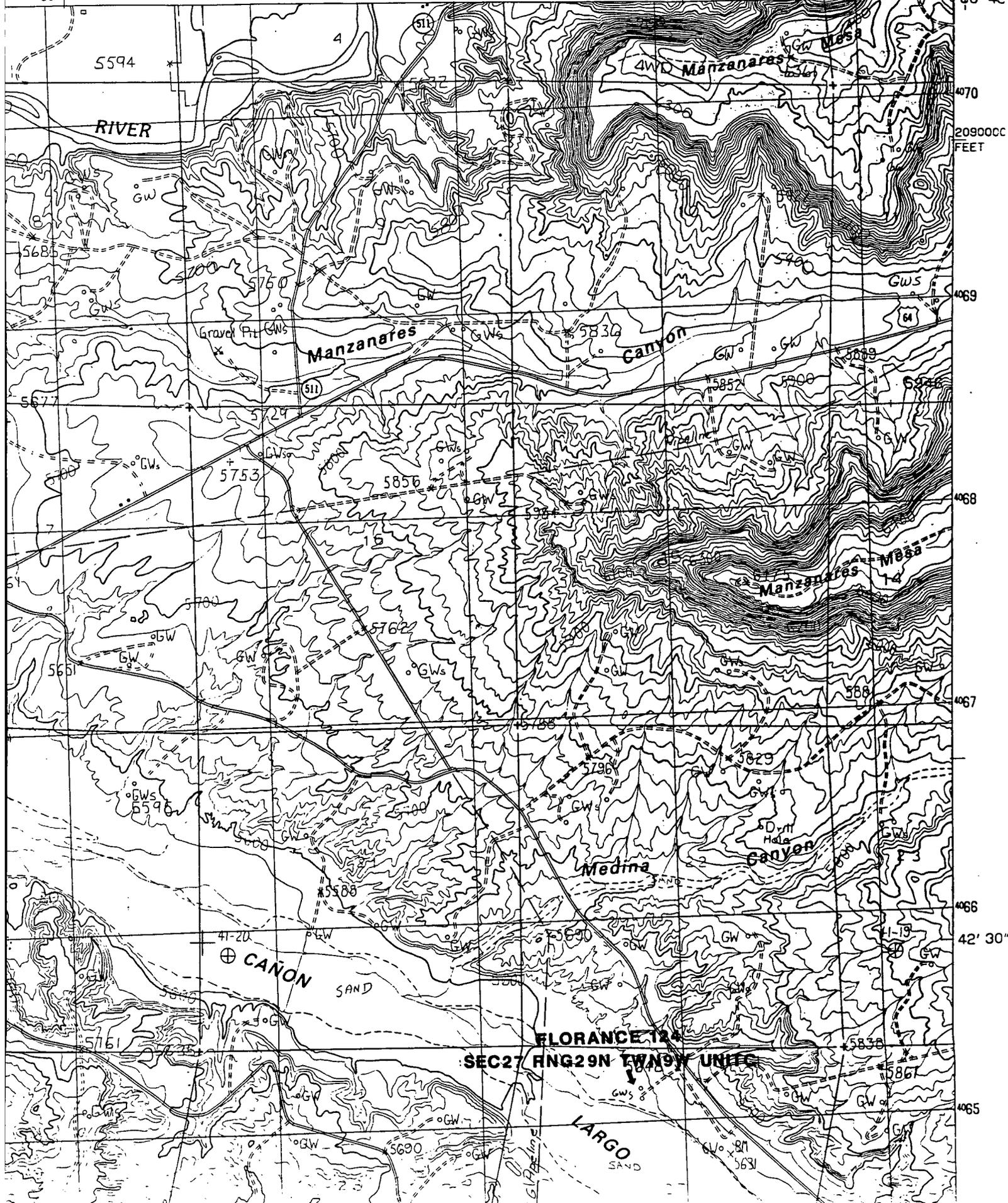
Maureen Gannon
Project Manager

MDG/FLOR124.LTR
Attachment

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

BLANCO QUADRANGLE
NEW MEXICO-SAN JUAN CO.
7.5 MINUTE SERIES (TOPOGRAPH)

250 47' 30" 251 252 520000 FEET 254 107° 45' 36" 45'



OFF: (505) 325-5667



LAB: (505) 325-1556

AROMATIC VOLATILE ORGANICS

Attn: *Maureen Gannon*
 Company: *PNM Gas Services*
 Address: *Alevardo Square, Mail Stop 0408*
 City, State: *Albuquerque, NM 87158*

Date: *2-Aug-96*
 COC No.: *4936*
 Sample No. *11681*
 Job No. *2-1000*

Project Name: *PNM Gas Services - Florance 124*
 Project Location: *9608020930*
 Sampled by: *GC* Date: *2-Aug-96* Time: *9:30*
 Analyzed by: *DC* Date: *2-Aug-96*
 Sample Matrix: *Water*

Laboratory Analysis

<i>Parameter</i>	<i>Result</i>	<i>Unit of Measure</i>	<i>Detection Limit</i>	<i>Unit of Measure</i>
<i>Benzene</i>	<i>2214.6</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Toluene</i>	<i>7397.7</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>297.1</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>3082.0</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>951.8</i>	<i>ug/L</i>	<i>0.2</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>13943.1</i>	<i>ug/L</i>		

Method - SW-846 EPA Method 8020 Aromatic Volatile Organics by Gas Chromatography

Approved by: *Day*
 Date: *8/5/96*

P.O. BOX 2606 • FARMINGTON, NM 87499

- TECHNOLOGY BLENDING INDUSTRY WITH THE ENVIRONMENT -

OFF: (505) 325-5667



LAB: (505) 325-1556

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 2-Aug-96

Internal QC No.: 0486-QC
Surrogate QC No.: 0488-QC
Reference Standard QC No.: 0417-QC

Method Blank

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

Calibration Check

Parameter	Unit of Measure	True Value	Analyzed Value	% Diff	Limit
Benzene	ppb	20.0	18.9	6	15%
Toluene	ppb	20.0	19.4	3	15%
Ethylbenzene	ppb	20.0	19.7	1	15%
m,p-Xylene	ppb	40.0	39.1	2	15%
o-Xylene	ppb	20.0	19.3	3	15%

Matrix Spike

Parameter	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	108	109	(39-150)	0	20%
Toluene	115	114	(46-148)	1	20%
Ethylbenzene	115	114	(32-160)	1	20%
m,p-Xylene	112	111	(35-145)	0	20%
o-Xylene	108	109	(35-145)	1	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovered	(70-130)	
11681-4936	100	

S1: Fluorobenzene

CHAIN OF CUSTODY RECORD

4936

Date: 8-2-96

Page 1 of 1



TECHNOLOGIES, LTD.

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

Purchase Order No.:		Job No.:		Name Maureen Gannon		Title					
SEND INVOICE TO	Name Denver Bearden			REPORT RESULTS TO	Company PNM Gas Services						
	Company PNM Gas Services		Dept. 324-3763		Mailing Address Alverado Square, Mail Stop 0408						
	Address 603 W. Elm Street				City, State, Zip Albuquerque, NM 87158						
	City, State, Zip Farmington, NM 87401				Telephone No. 505-848-2974		Telefax No.				
Sampling Location: Florance 124				ANALYSIS REQUESTED							
Sampler: GARY COOK				Number of Containers <div style="border: 1px solid black; padding: 5px; transform: rotate(-45deg); display: inline-block;"> X BTX-8030 </div>							
SAMPLE IDENTIFICATION		SAMPLE						MATRIX		PRES.	
		DATE	TIME							LAB ID	
9608030930		8-2-96	0930					H₂O		~	
Relinquished by: Gary Cook		Date/Time 8-2-96		Received by:		Date/Time 8/2/96 1220					
Relinquished by:		Date/Time		Received by:		Date/Time					
Relinquished by:		Date/Time		Received by:		Date/Time					
Method of Shipment:				Rush		24-48 Hours					
Authorized by: Gary Cook				Date 8-2-96		10 Working Days					
(Client Signature Must Accompany Request)						Special Instructions: Results to be sent to both parties.					



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

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time <u>1548</u>	Date <u>8/12/96</u>
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<u>Originating Party</u>	<u>Other Parties</u>
<u>Maureen Cannon - PNM</u>	<u>Bill Olson - voice mail</u>

Subject
Florence #124

Discussion
 Called to report ground water contamination of
 dry pit on Amos Florence #124
 unit C, sec 27, T29N, R09W
 DTW = 10-12'

Conclusions or Agreements

<u>Distribution</u> file Denny Faust - OCD Asst	Signed <u>Bill Olson</u>
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