

3R - 318

REPORTS

DATE:

2000



Environmental Services
187 County Road 4980
Bloomfield, New Mexico 87413
(505) 632-4409
(505) 632-4405

September 18, 2000

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SEP 28 2000

ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Mr. William Olson
Hydrologist
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: 2000 SAN JUAN BASIN ANNUAL GROUNDWATER REPORT

Dear Mr. Olson:

Enclosed for your review is the 2000 San Juan Basin Annual Groundwater Report prepared by Williams for work conducted by Public Service New Mexico (PNM). The report presents monitoring data for twenty-two sites having petroleum hydrocarbon impacted groundwater, which resulted from the past use of unlined surface impoundments. The reporting period begins in the second quarter of 1999 and ends in the second quarter of 2000. The sites included in the report are listed in Table 1, attached.

The natural gas production and gathering facilities at which the impacted groundwater sites are located were formerly owned and operated by PNM. The facilities became assets of Williams upon purchase of the Gas Company of New Mexico (GCNM) from PNM. PNM had retained certain environmental liabilities associated with the assets including obligations for unlined surface impoundment impacts to soil and groundwater. Subsequent negotiations between PNM and Williams resulted in an agreement whereby Williams would complete further investigations and remediation at sites not previously closed by PNM. The agreement also states that Williams will complete work at sites where PNM has identified soil or groundwater contamination or otherwise initiated remedial actions.

During PNM's tenure, management of sites with hydrocarbon impacted groundwater was directed by their Ground Water Management Plan. This plan specified general procedures for site investigation, remediation, and reporting. The plan called for PNM to prepare an annual report summarizing the results of groundwater monitoring at each site. The report was to be submitted each April 1st and include data collected during the second, third and fourth quarters of the previous year and data from the first quarter of the reporting year.

Anticipating termination of their environmental obligations, PNM requested on March 4, 2000 an extension for submittal of the 2000 annual report so that they could also include data collected during the second quarter of 2000. Although PNM completed collection of monitoring data for the second quarter of 2000, they did not prepare and submit an annual report. Williams has prepared the 2000 annual report in an effort to maintain project continuity and to provide closure to PNM's management of the project.

As with most projects of this magnitude, first hand knowledge is paramount to prepare a thorough summary of site activities. Given the limited firsthand knowledge of project workings, Williams is in the unenviable position of trying to glean information from only the paper record. As such, the 2000 report simply transmits the PNM-collected data to OCD in what we hope is a concise and useable format. Initially, it was Williams' goal to provide more comprehensive reporting on the status of each site, however, preliminary evaluation of the data soon revealed that accurate interpretations could not be formulated in a timely manner.

Williams is continuing to review and evaluate the data provided by PNM to determine the best course for future actions at the sites. Preliminary review has revealed several high priority needs. For the majority of sites, accurate surveys are needed along with development of site base maps and a comprehensive database to facilitate project management. Moreover, sites with free product should be evaluated to determine the efficacy of free-product recovery and whether or not all source contributions are known.

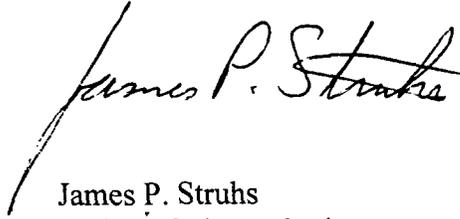
Organization of the report follows the same format used by PNM. Data for each site is contained in a separate tabbed section labeled with the site name. Each section contains a data summary table listing each monitoring well. The absence or presence of free product is indicated on the table and the concentrations of the BTEX compounds for the reporting period are noted. Following the data summary table are the actual laboratory analytical reports. In an effort to make this document more manageable, the laboratory quality control reports have not been included. These reports will of course remain a part of the project file and be made available for review upon request. In addition to the analytical data, a contour map depicting the elevation of the water table as interpolated from water-level data is also included. When possible, hydrographs illustrating the seasonal fluctuations in water-table elevations are presented.

Thank you for your understanding of the Williams position and the time to review this submittal. Mr. Jim Struhs has been assigned the role of Project Hydrogeologist and as such will be involved in many of the day to day project operations. If you have any questions regarding the report, you may call me at (505) 632-4409 or Jim at (505) 632-4457.

Best regards,



Mark B. Harvey
Project Manager
Mark.Harvey@Williams.com



James P. Struhs
Project Hydrogeologist
Jim.Struhs@Williams.com

Attachment
Enclosure

c: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Allen Talley, Williams

Table 1. List of Sites for Period Q2/1999 to Q2/2000

Site Name	Section	Township	Range	Unit Letter	OCD Notified	Installed Wells	2nd QTR 1999	3rd QTR 1999	4th QTR 1999	1st QTR 2000	2nd QTR 2000
Albright #4 Drip	22	29N	10W	F	9-Jul-99	28-Jul-99		5-Aug-99	6-Dec-99	5-Mar-00	7-Jun-00
Blanco Wash Drip	31	27N	8W	J	19-Feb-99	6-Apr-99	28-Apr-99	28-Sep-99	6-Dec-99	17-Mar-00	7-Jun-00
Chamberlain 1	14	32N	12W	F	30-Sep-99	13-Sep-99			11-Nov-99	1-Feb-00	2-May-00
Davis 1	11	31N	12W	E	2-Mar-99	2-Aug-99	25-May-99	20-Sep-99	8-Dec-99	14-Mar-00	8-Jun-00
Dogie East Pit	4	25N	6W	D	7-Jul-97	20-May-98	27-Apr-99	21-Sep-99	16-Nov-99	15-Feb-00	11-May-00
Dogie North Pit	4	25N	6W	D	7-Jul-97	6-Jul-97	27-Apr-99	21-Sep-99	16-Nov-99	15-Feb-00	11-May-00
Florance 124	27	29N	9W	C	12-Aug-96	28-Aug-96	7-Apr-99	28-Jul-99	14-Oct-99	1-Feb-00	26-Apr-00
Florance 40	21	30N	8W	G	27-Jan-97	29-Jan-97	21-Apr-99	28-Jul-99	1-Nov-99	21-Mar-00	14-Jun-00
Florance M 47X	5	30N	9W	G	27-Jan-97	6-Feb-97	21-Apr-99	28-Jul-99	3-Nov-99	23-Mar-00	14-Jun-00
Grenier 4A	7	31N	11W	M	18-Oct-99	28-Sep-99			3-Nov-99	7-Mar-00	12-Jun-00
Hampton 4M	13	30N	11W	N	7-Jan-97	31-Jan-97	5-May-99	12-Jul-99	21-Oct-99	27-Jan-00	13-Jun-00
Honolulu Drip	15	26N	4W	B	18-Jun-96	13-Jun-96	14-Apr-99	21-Sep-99	23-Nov-99	9-Feb-00	23-May-00
Ice Canyon Drip	15	26N	6W	B	1-Dec-97	13-May-98	27-Apr-99	20-Sep-99	16-Nov-99	7-Feb-00	18-May-00
Jicarilla Contract 147-6	6	25N	5W	C	13-Aug-98	27-Jan-99	14-Apr-99	27-Sep-99	15-Nov-99	20-Mar-00	7-Jun-00
Kaufman 1	33	31N	13W	H	9-Mar-00					9-Mar-00	22-May-00
Miles Federal 1E Drip	5	26N	7W	N	23-Jun-97	7-Jul-97	1-Jun-99	3-Aug-99	23-Nov-99	7-Feb-00	18-May-00
O' Shea 1M	3	31N	13W	F	6-Jun-98	9-Jul-98	24-May-99	6-Aug-99	12-Nov-99	3-Feb-00	9-May-00
Patterson A Com A1	2	31N	12W	G	2-Mar-99	15-Mar-99	2-Jun-99	6-Aug-99	22-Nov-99	15-Mar-00	8-Jun-00
Pritchard 2	6	30N	8W	J	22-Feb-99	1-Apr-99	26-May-99	17-Aug-99	20-Oct-99	26-Jan-00	17-Apr-00
Randleman 1	13	31N	11W	K	9-May-97	14-May-97	19-Apr-99	17-Aug-99	27-Oct-99	25-Jan-00	10-Apr-00
Wilmerding 1M	10	31N	13W	C	5-Jun-98	1-Jul-98	1-Jun-99	10-Aug-99	12-Oct-99	1-Feb-00	1-May-00
Zachry 18E	11	28N	10W	O	6-Sep-96	19-Nov-96	20-Apr-99	2-Aug-99	1-Nov-99	31-Jan-00	26-Apr-00



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ENVIRONMENTAL BUREAU
OIL CONSERVATION DIVISION

Annual
Groundwater
Report
2000

San Juan Basin, New Mexico
Lined Surface Impoundments

Site Summary Report

Site Name: Florance 124

Reporting Period: 2nd Qtr 1999 - 2nd Qtr 2000

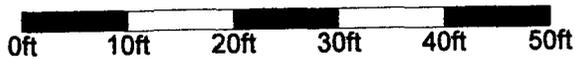
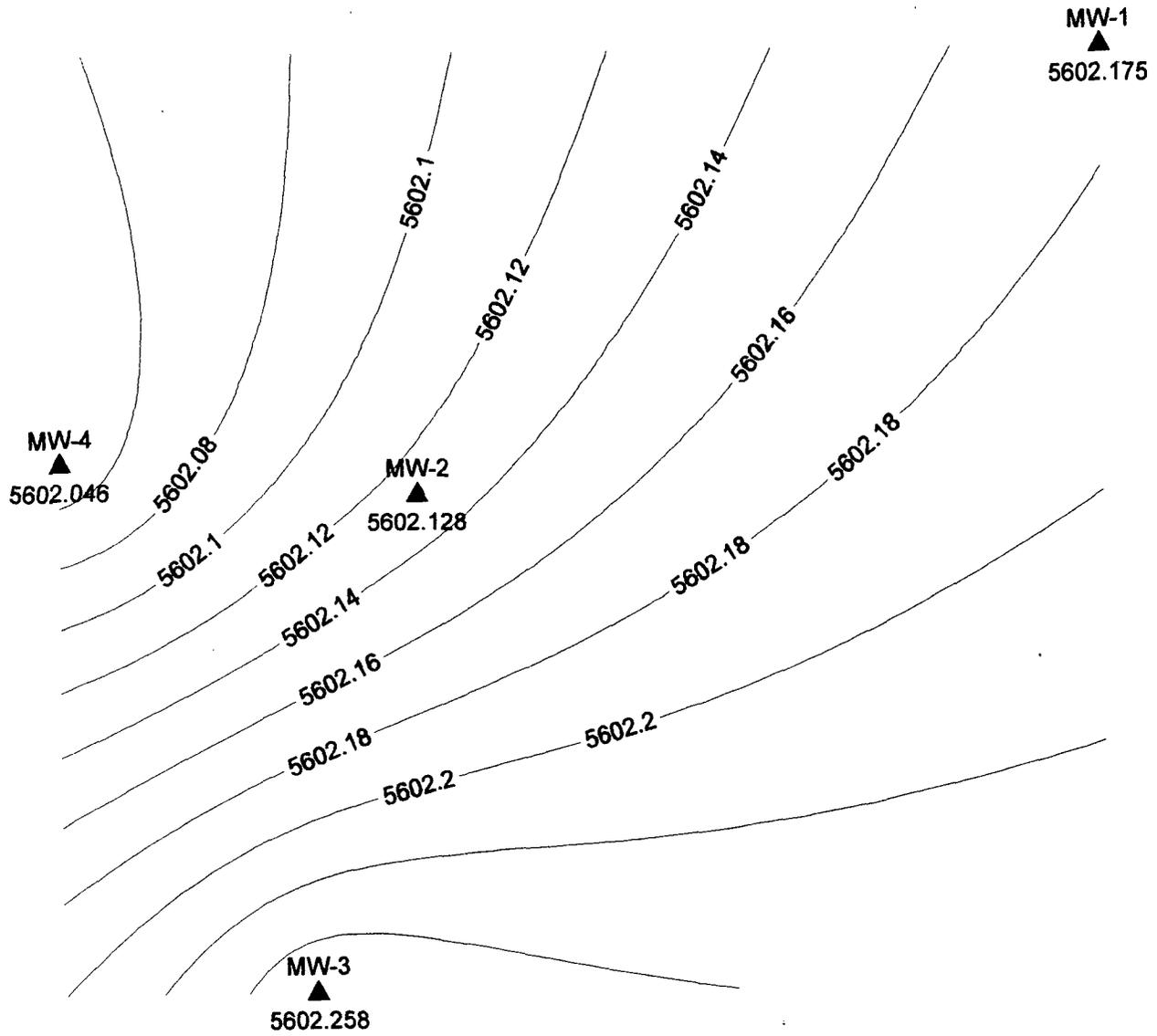
Location: Unit C, Sec 27, Twn 29N, Rng 9W
Canyon: Largo
Operator: Amoco

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

Status Narrative

This site has five monitoring wells, with fourteen quarters of ground water monitoring completed to date. The ground water gradient and areal extent of contamination has been established. Ground water contaminant levels in the former source area had not decreased significantly over the monitoring period, thus prompting additional soil remediation. In January 2000, extensive secondary soil remediation activities were conducted in the source area and northwest of the former pit. The former source area well MW-2 was removed and replaced with two new wells (MW-5 and MW-6). Failure of source area wells to demonstrate natural attenuation of contaminants may be an artifact of the well installation procedures. Wells having screened intervals located within contaminated soil horizons may not provide samples representative of actual dissolved constituent levels due to the presence of contaminated particles or colloids in the samples.

Florance 124
Potentiometric Surface Map
(October 14, 1999)



Florance 124
Summary of Groundwater Analytical Data
(Q2/1999 - Q2/2000)

Well ID	Sample ID	Sample Date	Free Product		Analytes (values in ug/L)			
			Present Yes/No	Thickness (ft.)	benzene	toluene	ethylbenzene	total xylenes
MW-2	9904071220	7-Apr-99			12	39	2	44
	9907281253	28-Jul-99			35	ND	3.7	14.8
	9910141025	14-Oct-99			53	ND	3.9	11
	NS	1-Feb-00						
	NS	26-Apr-00						
MW-5	9904071250	7-Apr-99			11	36	2	40
	NS	28-Jul-99						
	NS	14-Oct-99						
	0002011115	1-Feb-00			ND	ND	ND	ND
	0004261125	26-Apr-00			ND	ND	ND	ND
MW-6	NS	7-Apr-99						
	NS	28-Jul-99						
	NS	14-Oct-99						
	0002011130	1-Feb-00			25	ND	53	936
	0004261110	26-Apr-00			12	3	25	214

ND = analyte not detected above method detection limit
NS = well not sampled for specified analytes

OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 20-Apr-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	Florance 124
Work Order:	9904004	Client Sample ID:	9904071220; MW-2
Lab ID:	9904004-01A	Matrix:	AQUEOUS
Project:	Florance 124	Collection Date:	4/7/99 12:20:00 PM
		COC Record:	7485

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: HR
Benzene	12	1		µg/L	1	4/14/99
Toluene	39	2		µg/L	1	4/14/99
Ethylbenzene	2.4	1		µg/L	1	4/14/99
m,p-Xylene	30	2		µg/L	1	4/14/99
o-Xylene	14	1		µg/L	1	4/14/99

Qualifiers:	PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
	ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
	J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
	B - Analyte detected in the associated Method Blank	Surr: - Surrogate

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OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 20-Apr-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	Florance 124
Work Order:	9904004	Client Sample ID:	9904071250; MW-5
Lab ID:	9904004-02A	Matrix:	AQUEOUS
Project:	Florance 124	Collection Date:	4/7/99 12:50:00 PM
		COC Record:	7485

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: HR
Benzene	11	1		µg/L	1	4/14/99
Toluene	36	2		µg/L	1	4/14/99
Ethylbenzene	2.1	1		µg/L	1	4/14/99
m,p-Xylene	27	2		µg/L	1	4/14/99
o-Xylene	13	1		µg/L	1	4/14/99

Qualifiers: PQL - Practical Quantitation Limit S - Spike Recovery outside accepted recovery limits
ND - Not Detected at Practical Quantitation Limit R - RPD outside accepted recovery limits
J - Analyte detected below Practical Quantitation Limit E - Value above quantitation range
B - Analyte detected in the associated Method Blank Surr: - Surrogate

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1 of 1

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LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 09-Aug-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	Florance 124
Work Order:	9907066	Client Sample ID:	9907281253; MW-2
Lab ID:	9907066-01A	Matrix:	AQUEOUS
Project:	Florance 124	Collection Date:	07/28/1999 12:53:00 PM
		COC Record:	7053

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: DM
Benzene	35	0.5		µg/L	1	07/30/1999
Toluene	ND	0.5		µg/L	1	07/30/1999
Ethylbenzene	3.7	0.5		µg/L	1	07/30/1999
m,p-Xylene	14	1		µg/L	1	07/30/1999
o-Xylene	0.8	0.5		µg/L	1	07/30/1999

Qualifiers:	PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
	ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
	J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
	B - Analyte detected in the associated Method Blank	Surr: - Surrogate

OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 22-Oct-99

Client:	PNM - Public Service Company of NM	Client Sample Info:	Florance #124
Work Order:	9910026	Client Sample ID:	9910141025; MW-2
Lab ID:	9910026-01A	Matrix:	AQUEOUS
Project:	Florance #124	Collection Date:	10/14/99 10:25:00 AM
		COC Record:	7745

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: HR
Benzene	53	0.5		µg/L	1	10/18/99
Toluene	ND	0.5		µg/L	1	10/18/99
Ethylbenzene	3.9	0.5		µg/L	1	10/18/99
m,p-Xylene	11	1		µg/L	1	10/18/99
o-Xylene	ND	0.5		µg/L	1	10/18/99

Qualifiers:	PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
	ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
	J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
	B - Analyte detected in the associated Method Blank	Sur: - Surrogate

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LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 28-Feb-00

Client:	PNM - Public Service Company of NM	Client Sample Info:	Florance 124
Work Order:	0002006	Client Sample ID:	0002011115; MW-5
Lab ID:	0002006-01A	Matrix:	AQUEOUS
Project:	Florance 124	Collection Date:	2/1/2000 11:15:00 AM
		COC Record:	7865

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
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AROMATIC VOLATILES BY GC/PID		SW8021B		Analyst: DM		
Benzene	ND	0.5		µg/L	1	2/4/2000
Toluene	ND	0.5		µg/L	1	2/4/2000
Ethylbenzene	ND	0.5		µg/L	1	2/4/2000
m,p-Xylene	ND	1		µg/L	1	2/4/2000
o-Xylene	ND	0.5		µg/L	1	2/4/2000

Qualifiers:

PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
B - Analyte detected in the associated Method Blank	Sur: - Surrogate

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OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Date: 28-Feb-00

Client:	PNM - Public Service Company of NM	Client Sample Info:	Florance 124
Work Order:	0002006	Client Sample ID:	0002011130; MW-6
Lab ID:	0002006-02A	Matrix:	AQUEOUS
Project:	Florance 124	Collection Date:	2/1/2000 11:30:00 AM
		COC Record:	7865

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
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AROMATIC VOLATILES BY GC/PID

SW8021B

Analyst: DM

Benzene	25	0.5		µg/L	1	2/4/2000
Toluene	ND	0.5		µg/L	1	2/4/2000
Ethylbenzene	53	0.5		µg/L	1	2/4/2000
m,p-Xylene	850	5		µg/L	5	2/8/2000
o-Xylene	86	0.5		µg/L	1	2/4/2000

Qualifiers:

PQL - Practical Quantitation Limit

S - Spike Recovery outside accepted recovery limits

ND - Not Detected at Practical Quantitation Limit

R - RPD outside accepted recovery limits

J - Analyte detected below Practical Quantitation Limit

E - Value above quantitation range

B - Analyte detected in the associated Method Blank

Surr: - Surrogate

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2 of 2

OFF: (505) 325-5667
FAX: (505) 327-1496



LAB: (505) 325-1556
FAX: (505) 327-1496

ANALYTICAL REPORT

Date: 02-May-00

Client:	PNM - Public Service Company of NM	Client Sample Info:	Florance 124
Work Order:	0004054	Client Sample ID:	0004261125; MW-5
Lab ID:	0004054-02A	Matrix:	AQUEOUS
Project:	Florance 124	Collection Date:	4/26/2000 11:25:00 AM
		COC Record:	8508

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: HR
Benzene	ND	0.5		µg/L	1	4/26/2000
Toluene	ND	0.5		µg/L	1	4/26/2000
Ethylbenzene	ND	0.5		µg/L	1	4/26/2000
m,p-Xylene	ND	1		µg/L	1	4/26/2000
o-Xylene	ND	0.5		µg/L	1	4/26/2000

Qualifiers:

PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
B - Analyte detected in the associated Method Blank	Surr: - Surrogate

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FAX: (505) 327-1496



LAB: (505) 325-1556
FAX: (505) 327-1496

ANALYTICAL REPORT

Date: 02-May-00

Client:	PNM - Public Service Company of NM	Client Sample Info:	Florance 124
Work Order:	0004054	Client Sample ID:	0004261110; MW-6
Lab ID:	0004054-01A	Matrix:	AQUEOUS
Project:	Florance 124	Collection Date:	4/26/2000 11:10:00 AM
		COC Record:	8508

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B		Analyst: HR		
Benzene	12	0.5		µg/L	1	4/26/2000
Toluene	2.9	0.5		µg/L	1	4/26/2000
Ethylbenzene	25	0.5		µg/L	1	4/26/2000
m,p-Xylene	180	1		µg/L	1	4/26/2000
o-Xylene	34	0.5		µg/L	1	4/26/2000

Qualifiers:

PQL - Practical Quantitation Limit	S - Spike Recovery outside accepted recovery limits
ND - Not Detected at Practical Quantitation Limit	R - RPD outside accepted recovery limits
J - Analyte detected below Practical Quantitation Limit	E - Value above quantitation range
B - Analyte detected in the associated Method Blank	Surr: - Surrogate

Olson, William

From: m. harvey [SMTP:markh@ditell.com]
Sent: 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 all 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](mailto: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