

3R - 340

**GENERAL
CORRESPONDENCE**

YEAR(S):

2000 - 1997

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]
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

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

SEP 14 1999

September 13, 1999

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



RE: WELL INSTALLATION PLANS FOR SAN JUAN BASIN GROUNDWATER SITES

Dear Bill:

PNM herein submits monitoring well installation plans for several groundwater sites that we are managing in the San Juan Basin. You requested these plans in an August 16, 1999 letter entitled, "Final San Juan Basin Pit Closure Reports," that was sent to Ms. Kathy Juckes, PNM-Farmington. The subject groundwater sites are the Dogie Compressor Station North Pit, Florance #32A, Jacques #2A, Mangum #1E, McClanahan #22, Dogie Compressor Station East Pit, Honolulu Loop Line Drip, Ice Canyon Drip, Jicarilla Contract 147-6, and Randleman #1.

The well installation plan for each of the above-referenced sites consists of a map depicting the existing monitoring well configuration at the site with associated historical BTEX data. Any proposed new well location is denoted by a large "X" on the map. In some instances, the proposed wells have already been installed and sampled, and the analytical results for BTEX are reported next to these locations on the attached maps. PNM will prepare formal reports on all of the subject sites requiring new well installations in either individual groundwater/pit closure reports or the Annual Groundwater Report to be submitted to the OCD in 2000.

PNM would like to bring the Randleman 1 well site and the Honolulu Loop Line Drip to your attention. The Randleman 1 site is operated by Burlington Resources and poses many unique problems, including:

- an increase in benzene concentrations in PNM's source and downgradient wells after cessation of discharge, and primary and secondary remediation of PNM's former pit (see figure 10);
- elevated chloride levels groundwater monitoring wells on site (see attachment to figure 10); and
- potential impacts to underlying groundwater from Burlington's operations and their former pit (Approximately one year after remediation, Burlington's pit excavation and on site landfarm remain open).

The Honolulu Loop Line Drip is operated by Williams and has also experienced its own set of problems, including, most recently, a significant increase in benzene in MW-5 and MW-12 (see figure 7 and attachment to figure 7). As you may recall, PNM conducted extensive secondary removal of contaminated soils in the area and south of Williams pipeline in December of 1998 after the appearance of free product and high dissolved-phase BTEX contaminants. At both the Randleman 1 and the Honolulu Loop Line Drip, PNM agrees that the installation of additional wells is necessary to fully define the extent of the dissolved-phase contaminant plumes. However, such action, on the part of PNM, assumes that all responsibility at the site is ours. In contrast, we believe that the ongoing problems may be the responsibility of the producer or are at least shared with them. Therefore, before agreeing to install additional wells at these particular locations, PNM is considering several options at either site and will be contacting you in the very near future to inform you of our proposed strategies.

Mr. B. Olson
09/13/1999
Page 2

Please review the attached site maps and accept them as our groundwater monitoring well installation plans. All well installations and sampling events will be conducted in accordance with PNM's Groundwater Management Plan for Unlined Surface Impoundments, March 1996. If you need additional information or have any questions, you may call me at (505) 241-2974. Thank you for your time and consideration concerning this matter.

Sincerely,
PNM Environmental Services

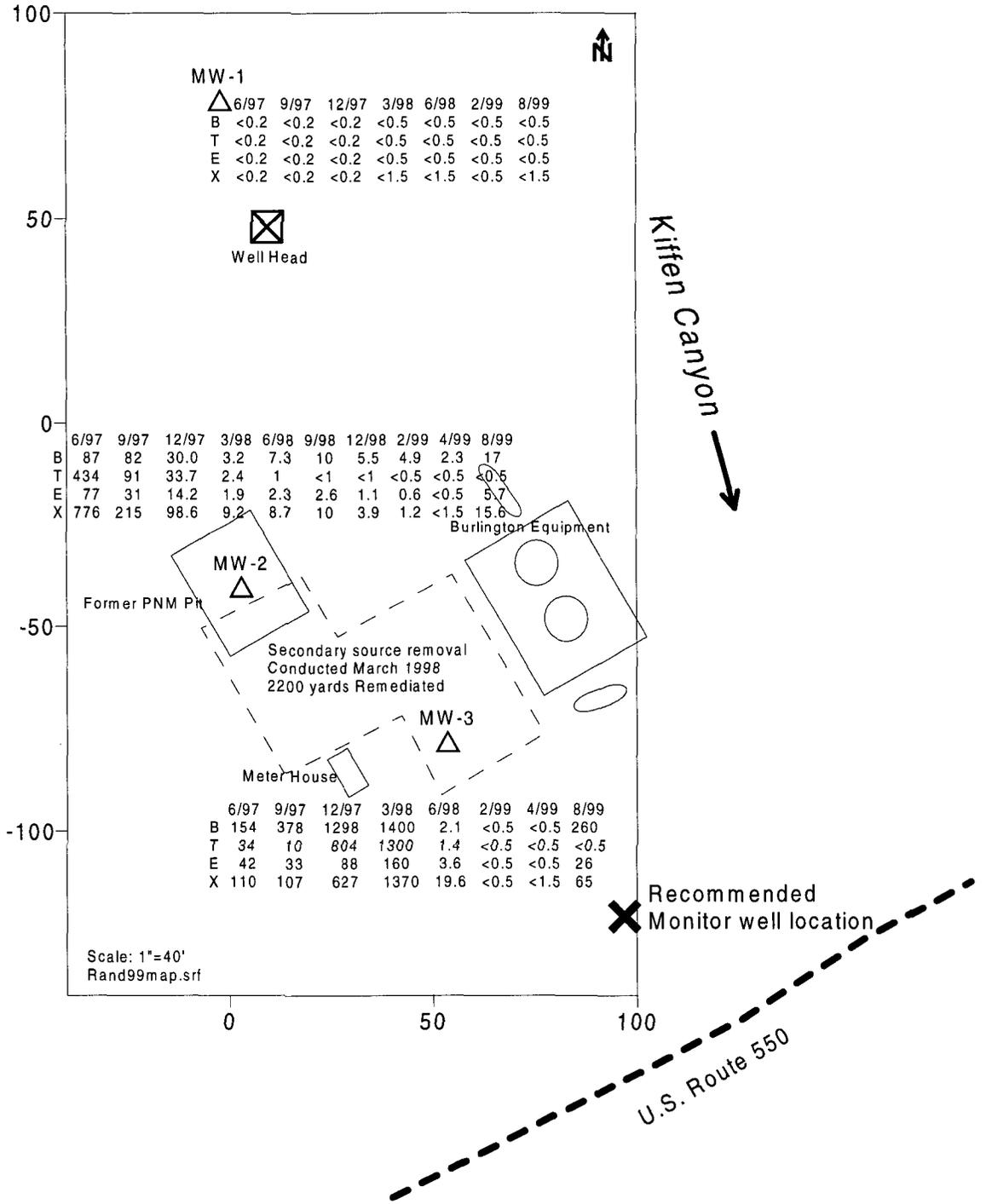


Maureen Gannon
Project Manager

Attachments

cc: Ingrid Deklau, WFS
Denny Foust, OCD-Aztec Office
Kathy Juckes, PNM Farmington File
Keith Manwell, Jicarilla Environmental Protection Office
Mark Sikelianos, PNM

**Figure 10. Randleman 1 Site Map and Analytical Results
(concentrations in ppm)**



Randleman 1
Water Quality Comparison
Attachment to Figure 10.

	MW-1			MW-2			MW-3		Up Stream 8/17/99	Down Stream 8/17/99
	6/25/97	2/22/99	8/17/99	6/25/97	9/25/98	2/22/99	8/17/99	8/17/99		
Cations/Anions										
Na	678	630	630	1235	1300	1200	1150	550	110	49
Ca	472	410	430	540	500	390	420	390	210	110
Mg	23.6	23	28	23.3	33	26	37	23	11	6.2
K	8.2	6.9	6.2	9.7	7.4	7.4	6.4	5.9	5.6	3.6
Cl	170	160	120	645	620	610	640	92	12	8.1
SO4	2348	2200	2080	2982	2690	2200	2770	1500	720	300
CO3 Carbonate	<1	<5	<5	<1	<1	<5	<5	<5	<5	<5
HCO3 Bicarbonate	218	250	280	355	240	250	240	630	100	94
OH Hydroxide	<1	<5	<0.5	<1	not reported	<5	<5	<5	<5	<5
Total Cation-Anion	112.45 meq/L	103.92 meq/l	102.60 meq/l	167.11 meq/L	160.17 meq/L	151.04 meq/l	153.88 meq/l	89.65 meq/l	33.10 meq/l	16.10 meq/l
Difference Cation-Anion	2.06 meq/L	4.19 meq/l	0.38 meq/l	1.44 meq/L	6.06 meq/L	4.77 meq/l	5.70 meq/l	1.27 meq/l	1.05 meq/l	0.10 meq/l
%Difference	1.8	4	0.4	0.9	3.8	3.2	3.7	1.4	3.2	0.6
TDS	3937	3900	3610	5744	5300	3900	5350	3030	1220	590
Hardness, total	1276	1100	1180	1444	1400	1100	1200	1070	560	290

Olson, William

From: Olson, William
Sent: Tuesday, August 31, 1999 8:07 AM
To: 'MGannon@pnm.com'
Subject: RE: Request for Extension
Importance: High

The below requested extension is approved.

From: MGannon@pnm.com[SMTP:MGannon@pnm.com]
Sent: Monday, August 30, 1999 4:30 PM
To: Olson, William
Cc: MSikeli@pnm.com
Subject: Request for Extension

As discussed with you last week during the OCC hearing on the Hampton 4M site, PNM requests an extension to complete our plans documenting additional ground water monitoring well installations at several sites we are currently managing in the San Juan Basin. Your letter of August 16, 1999 asks that a plan be submitted by Tuesday, August 31, 1999. We request an additional two weeks from this date to finish the plans and submit them to your office. We will have the plans to you by Tuesday, September 14, 1999.

We appreciate your patience in this matter. If you have any questions or concerns, please call me at (505) 241-2974.

Maureen Gannon
Environmental Services
241-2974



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

May 28, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-668

Ms. Maureen Gannon
Public Service Company of New Mexico
Alvarado Square, MS-0408
Albuquerque, New Mexico 87401

RE: 1999 SAN JUAN BASIN ANNUAL GROUNDWATER REPORT

Dear Ms. Gannon:

The New Mexico Oil Conservation Division (OCD) has reviewed Public Service Company of New Mexico's (PNM) April 5, 1999 "1999 SAN JUAN BASIN ANNUAL GROUNDWATER REPORT". This document contains the results of PNM's 1998 monitoring and remediation of contaminated ground water related to the closure of unlined oil and gas production pits in the San Juan Basin.

The OCD has the following comments and requirements regarding the above referenced document:

- A. On July 14, 1999, the OCD required that PNM install additional ground water monitoring wells at 7 sites to determine the extent of ground water contamination that was in excess of New Mexico Water Quality Control Commission (WQCC) ground water standards. According to the above referenced documents additional wells were installed at 2 of the sites. However, the documents do not contain any information on the installation of additional monitoring wells for the sites listed below. The OCD requires that PNM submit a plan to address this deficiency for these sites. The plan shall be submitted to the OCD Santa Fe Office by July 28, 1999 with a copy provided to the OCD Aztec District Office.

- | | | |
|----|------------------------------------|-----------------------------|
| 1. | Dogie Compressor Station North Pit | Unit D, Sec. 04, T25N, R06W |
| 2. | Florance #32A | Unit F, Sec. 15, T30N, R08W |
| 3. | Jacques #2A | Unit D, Sec. 25, T30N, R09W |
| 4. | Mangum #1E | Unit F, Sec. 33, T29N, R11W |
| 5. | McClanahan #22 | Unit G, Sec. 14, T28N, R10W |

Ms. Maureen Gannon
May 28, 1999
Page 2

B. The closure reports for the sites listed below show that the extent of ground water contamination in excess of New Mexico WQCC ground water standards has not been completely defined. Therefore, the OCD requires that PNM submit a plan for the installation of additional monitor wells to determine the extent of ground water contamination at these sites. The plan shall be submitted to the OCD Santa Fe Office by July 28, 1999 with a copy provided to the OCD Aztec District Office.

- | | | |
|----|-----------------------------------|-----------------------------|
| 1. | Dogie Compressor Station East Pit | Unit D, Sec. 04, T25N, R06W |
| 2. | Honolulu Line Drip | Unit B, Sec. 15, T26N, R04W |
| 3. | Ice Canyon Drip | Unit H, Sec. 13, T26N, R07W |
| 4. | Jicarilla Contract 147-6 | Unit C, Sec. 06, T25N, R05W |
| 5. | Randalman #1 | Unit K, Sec. 13, T31N, R11W |

C. Several of the reports state that certain contaminants such as chloride, sulfate and total dissolved solids are not enforceable standards under State of New Mexico regulations. For your information, all of the WQCC standards as contained in 20 NMAC 6.2.3101 are enforceable standards.

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

Sincerely,



William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office
Kurt Sandoval, Jicarilla Apache Environmental Protection Office



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

July 14, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-312

Ms. Maureen Gannon
Public Service Co. of New Mexico - Gas Services
Alvarado Square, MS-0408
Albuquerque, New Mexico 87401

RE: SAN JUAN BASIN ANNUAL GROUNDWATER REPORT

Dear Ms. Gannon:

The New Mexico Oil Conservation Division (OCD) has reviewed Public Service Company of New Mexico's (PNM) April 2, 1998 "1998 SAN JUAN BASIN ANNUAL GROUNDWATER REPORT". This document contains the results of PNM's 1997 monitoring and remediation of contaminated ground water related to the closure of unlined oil and gas production pits in the San Juan Basin.

Below is the OCD's review of this document:

- A. The closure reports for the sites listed below shows that the extent of ground water contamination in excess of New Mexico Water Quality Control Commission (WQCC) ground water standards has not been completely defined. Therefore, the OCD requires that PNM install additional ground water monitoring wells to monitor and determine the extent of ground water contamination pursuant to their previously approved ground water investigation plan.

- | | | |
|----|--------------------------------|-----------------------------|
| 1. | Dogie Compressor Station North | Unit D, Sec. 04, T25N, R06W |
| 2. | Florance #32A | Unit F, Sec. 15, T30N, R08W |
| 3. | Jacques #2A | Unit D, Sec. 25, T30N, R09W |
| 4. | Mangum #1E | Unit F, Sec. 33, T29N, R11W |
| 5. | McClanahan #22 | Unit G, Sec. 14, T28N, R10W |
| 6. | Miles Federal #1E Drip | Unit N, Sec. 05, T26N, R07W |
| 7. | Zachry #18E | Unit O, Sec. 11, T28N, R10W |

Ms. Maureen Gannon
July 14, 1998
Page 2

B. A review of the ground water quality data for the sites listed below shows that either metals or chlorides and total dissolved solids are present in ground water in excess of WQCC standards at the sites. The OCD requires that PNM determine the extent of these ground water contaminants pursuant to their previously approved ground water investigation plan.

- | | | |
|----|------------------------|-----------------------------|
| 1. | Miles Federal #1E Drip | Unit N, Sec. 05, T26N, R07W |
| 2. | Randleman #1 | Unit K, Sec. 13, T31N, R11W |

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

Sincerely,



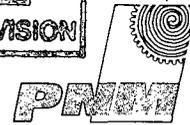
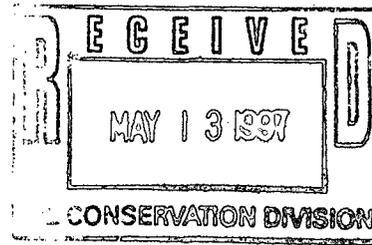
William C. Olson
Hydrologist
Environmental Bureau

xc: Denny Foust, OCD Aztec District Office
Bill Liess, BLM Farmington District Office

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

May 9, 1997

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



RE: NOTIFICATION OF GROUNDWATER CONTAMINATION AT THE RANDLEMAN 1 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 Randleman 1 well site, located in section 13, township 31 North, range 11 West, unit letter K. A topographic map showing the location of the site is provided as an attachment. The operator is Burlington Resources. This letter follows verbal notification provided to you on Friday, May 9, 1997 (M. Gannon, PNM to B. Olson, OCD).

On April 30, 1997, PNM technicians encountered groundwater at the Randleman 1 at approximately 22 feet below ground surface while excavating the former pit. A groundwater sample was collected and delivered to OnSite Technologies, Farmington, New Mexico for BTEX analysis using EPA method 8020. A hardcopy of the laboratory report is attached. A summary of the analytical results is provided below:

Component	Units	WQCC Stds.	Groundwater Sample
Benzene	ppb	10	84
Toluene	ppb	750	253
Ethylbenzene	ppb	750	26
Xylenes	ppb	620	716
Total BTEX	ppb		1079

Bold type indicates a WQCC exceedance.

This letter serves as written notification of groundwater contamination at the Randleman 1 well site. PNM will conduct future activities at the site pursuant to PNM's Groundwater Management Plan. If you have any questions, please call me at (505) 241-2974. Thank you.

Sincerely,
PNM

A handwritten signature in cursive script that reads "Maureen Gannon".

Maureen Gannon
Project Manager

s/gaspits/rand101.doc

Attachment

cc: Colin Adams, PNM
Denver Bearden, PNMGS
Craig Bock, Burlington Resources
Denny Foust, OCD-Aztec Office
Robin Prisk, WFS
Toni Ristau, PNM

OFF: (505) 325-5667



LAB: (505) 325-1556

ANALYTICAL REPORT

Attn: *Denver Bearden*
 Company: *PNM Gas Services*
 Address: *603 W. Elm*
 City, State: *Farmington, NM 87401*

Date: *2-May-97*
 COC No.: *5146*
 Sample No.: *14374*
 Job No.: *2-1000*

Project Name: *PNM Gas Services - Randleman #1*
 Project Location: *9704300730; Pit Excavation Groundwater Sample*
 Sampled by: *RH* Date: *30-Apr-97* Time: *7:30*
 Analyzed by: *DC* Date: *2-May-97*
 Sample Matrix: *Liquid*

Parameter	Results as Received	Unit of Measure	Limit of Quantitation	Unit of Measure
<i>Benzene</i>	<i>84</i>	<i>ug/L</i>	<i>1</i>	<i>ug/L</i>
<i>Toluene</i>	<i>253</i>	<i>ug/L</i>	<i>1</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>26</i>	<i>ug/L</i>	<i>1</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>588</i>	<i>ug/L</i>	<i>1</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>128</i>	<i>ug/L</i>	<i>1</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>1080</i>	<i>ug/L</i>		

ND - Not Detected at Limit of Quantitation

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

Approved By: *[Signature]*
 Date: *5/2/97*

QUALITY ASSURANCE REPORT
for EPA Method 8020

Date Analyzed: 2-May-97

Internal QC No.: 0527-STD

Surrogate QC No.: 0528-STD

Reference Standard QC No.: 0529/30-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	18.8	6	15%
Toluene	ppb	20.0	19.3	3	15%
Ethylbenzene	ppb	20.0	19.5	2	15%
m,p-Xylene	ppb	40.0	37.7	6	15%
o-Xylene	ppb	20.0	19.5	2	15%

Matrix Spike

Parameter	1 - Percent Recovered	2 - Percent Recovered	Limit	%RSD	Limit
Benzene	89	89	(39-150)	0	20%
Toluene	93	91	(46-148)	1	20%
Ethylbenzene	92	92	(32-160)	0	20%
m,p-Xylene	93	92	(35-145)	0	20%
o-Xylene	92	91	(35-145)	0	20%

Surrogate Recoveries

Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered	Laboratory Identification	S1 Percent Recovered	S2 Percent Recovered
Limit Percent Recovered	(70-130)		Limit Percent Recovered	(70-130)	
14374-5146	94				

S1: Fluorobenzene

(M)
5/2/97



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 0921	Date 5/9/97
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<u>Originating Party</u>	<u>Other Parties</u>
Maureen Cannon - PNM	Bill Olson - Environmental Bureau voice mail

Subject
 Randallman #1 Ground Water Contamination Notification

Discussion
 Deny^{pt} on Burlington Resources well site - Randallman #1
 Location - sec 13, T31N, R11W
 Depth to water = 22 feet
 Ground water analysis Benzene - 84 ppb
 BTEX - 1080 ppb

Conclusions or Agreements

Distribution
 file
 Denny Foust - OCD Artec

Signed *Bill Olson*