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**ANNUAL
MONITORING
REPORT**

2/28/2009

**MWH**

BUILDING A BETTER WORLD

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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:

Volume Location Type

- | | |
|---|--|
| 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)

**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.



**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Lat 0-21 Line Drip
Meter Code: LD151**

SITE DETAILS

Legal Description:	Town: 30N	Range: 9W	Sec: 12	Unit: O
NMOCD Haz Ranking:	40	Land Type: Federal	Operator: Enterprise	

PREVIOUS ACTIVITIES

Site Assessment:	1/95	Excavation:	1/95	Soil Boring:	10/95
Monitor Well:	10/95	Geoprobe:	11/96	Additional MWs:	7/00
Downgradient MWs:	7/00	Replace MW:	NA	Quarterly Initiated:	11/96
ORC Nutrient Injection:	NA	Re-Excavation:	NA	PSH Removal Initiated:	NA
Annual Initiated:	5/97	Quarterly Resumed:	NA	PSH Removal in 2008?	No

SUMMARY OF 2008 ACTIVITIES

MW-1: Quarterly groundwater sampling (April, July, and October) and water level monitoring was performed during 2008.

MW-2: Quarterly water level monitoring (April, July, and October) was performed during 2008.

MW-3: Quarterly groundwater sampling (April, July, and October) and water level monitoring was performed during 2008.

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

SITE MAPS

Site maps (April, July, and October) are attached as Figures 1, 2, and 3.

SUMMARY TABLES AND GRAPHS

- Historic analytical and water level data are summarized in Table 1 and presented graphically in Figures 4 through 6.
- Historic free-product recovery data are summarized in Table 2. Free-product has not been recovered from the Site since 2002.
- The 2008 laboratory reports are presented in Attachment 1 (included on CD).

**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Lat 0-21 Line Drip
Meter Code: LD151**

- The 2008 field documentation is presented in Attachment 2 (included on CD).

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

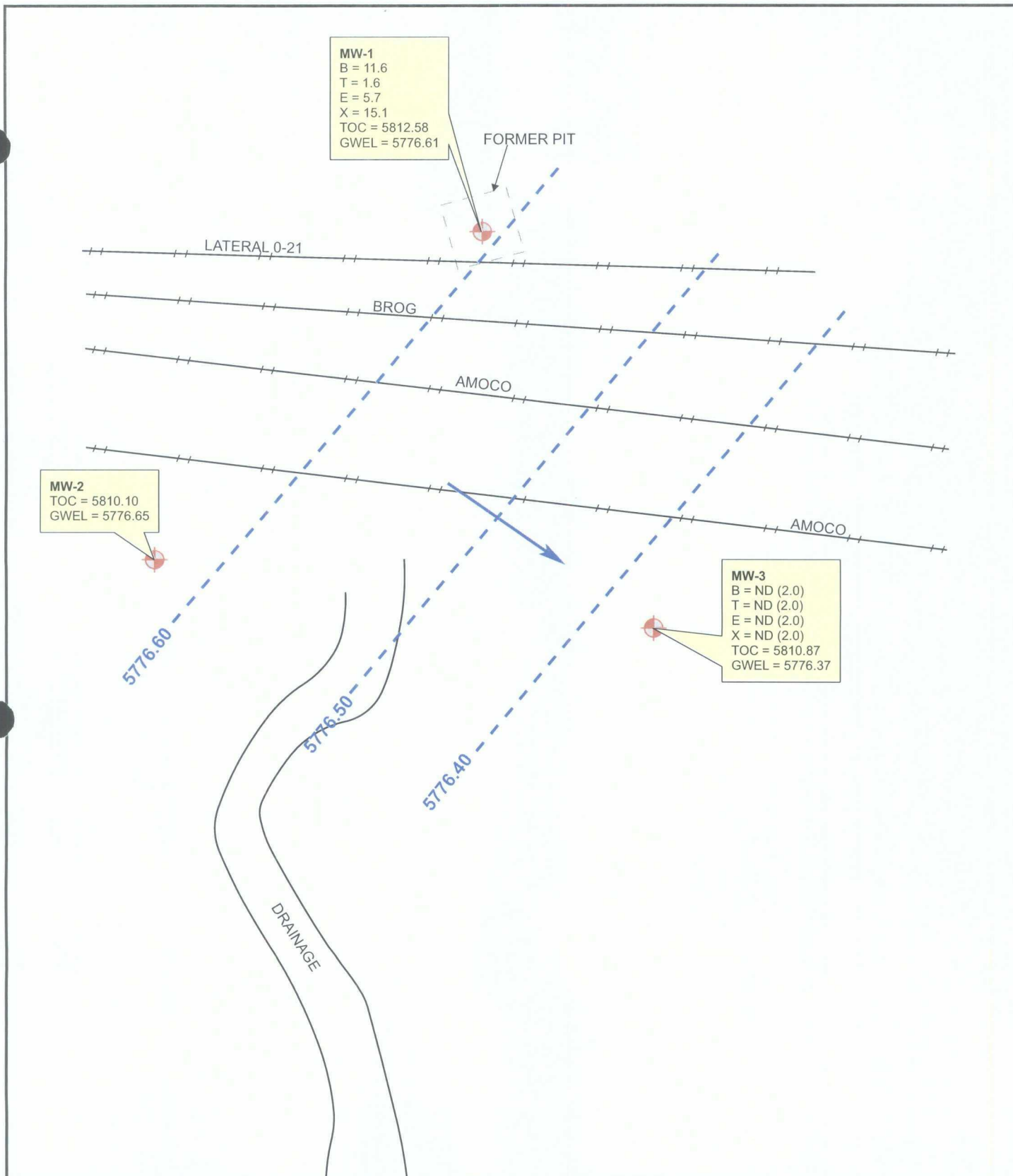
No isoconcentration maps were prepared for this Site; however, the attached Site maps present the water level and analytical data collected during 2008.

RESULTS

- Groundwater flow has historically been toward the southeast.
- The BTEX sample from MW-1 exceeded the standard for benzene in April and July 2008 (11.6 µg/L and 11.2 µg/L, respectively), but fell below the standard in October 2008 (7.6 µg/L). All other parameters were below standards during 2008. The benzene results represent a significant attenuation from the high benzene concentration of 5,380 µg/L in 1997.
- With the exception of a total xylenes concentration of 2.3 µg/L in July 2008, BTEX constituents were not detected in the 2008 MW-3 groundwater samples. These results are consistent with the overall decline in concentrations since 2000, when, for example, the benzene concentration was 190 µg/L.
- Site-wide decreases in BTEX concentrations provide evidence that natural attenuation is occurring at the Site.

RECOMMENDATIONS

- Higher MW-1 benzene concentrations have typically been observed in the Spring; however, in 2008 the Spring/Summer results were very near the benzene standard. EPTPC recommends quarterly sampling of MW-1 until BTEX concentrations are below NMWQCC standards for four consecutive quarters, at which time this Site will be submitted for closure.
- Because BTEX concentrations at MW-2 have remained below closure criteria, EPTPC recommends that this well not be sampled again until closure.
- Because BTEX concentrations at MW-3 have remained below closure criteria, EPTPC recommends that this well not be sampled again until closure.



LEGEND

MW-4 Existing Monitoring / Observation Well

Groundwater Flow Direction

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)



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PROJECT:

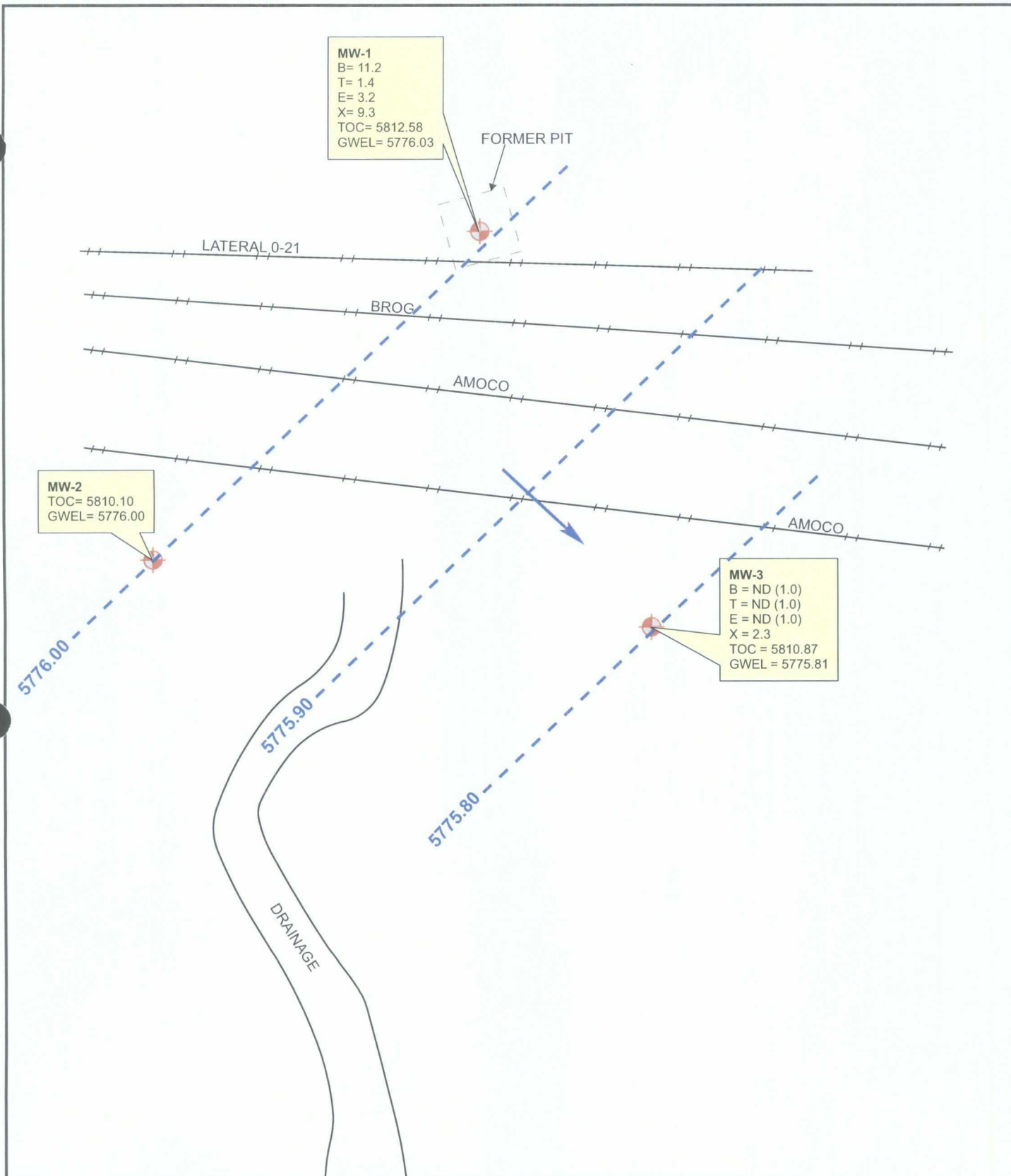
LATERAL 0-21 Line Drip

TITLE:

Groundwater Potentiometric Surface Map,
and BTEX Concentrations - April 21, 2008

FIGURE:

1



LEGEND

- MW-4** Existing Monitoring / Observation Well
- Groundwater Flow Direction
- 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)



0 30 Feet



MWH

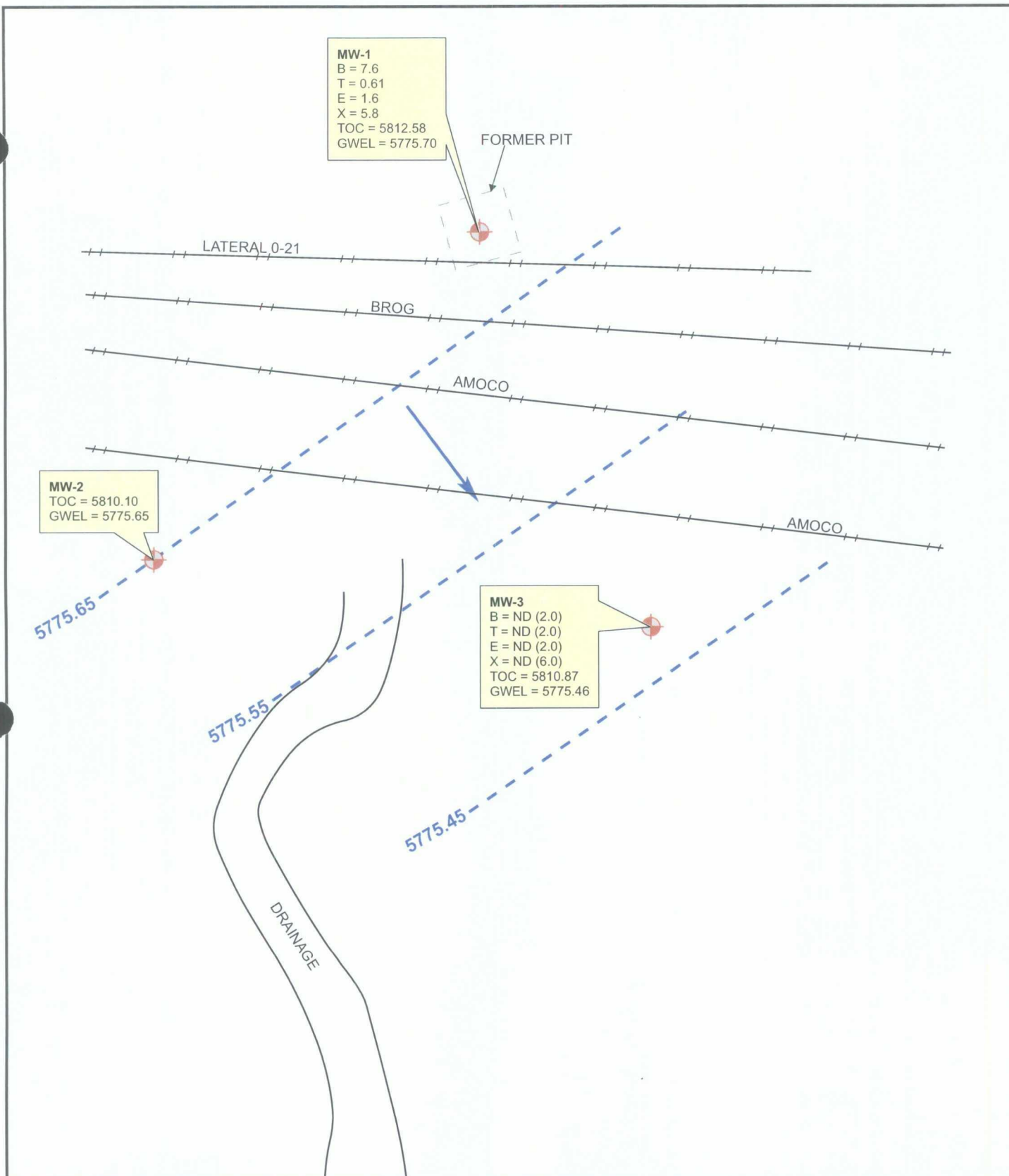


PROJECT: LATERAL 0-21 Line Drip

TITLE: Groundwater Potentiometric Surface Map,
and BTEX Concentrations - July 23, 2008

FIGURE:

2



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)



0 30 Feet



MWH



PROJECT: LATERAL 0-21 Line Drip

TITLE: Groundwater Potentiometric Surface Map,
and BTEX Concentrations - October 8, 2008

FIGURE:

3

FIGURE 4
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
LAT 0-21 LINE DRIP (METER #LD151)
MW01

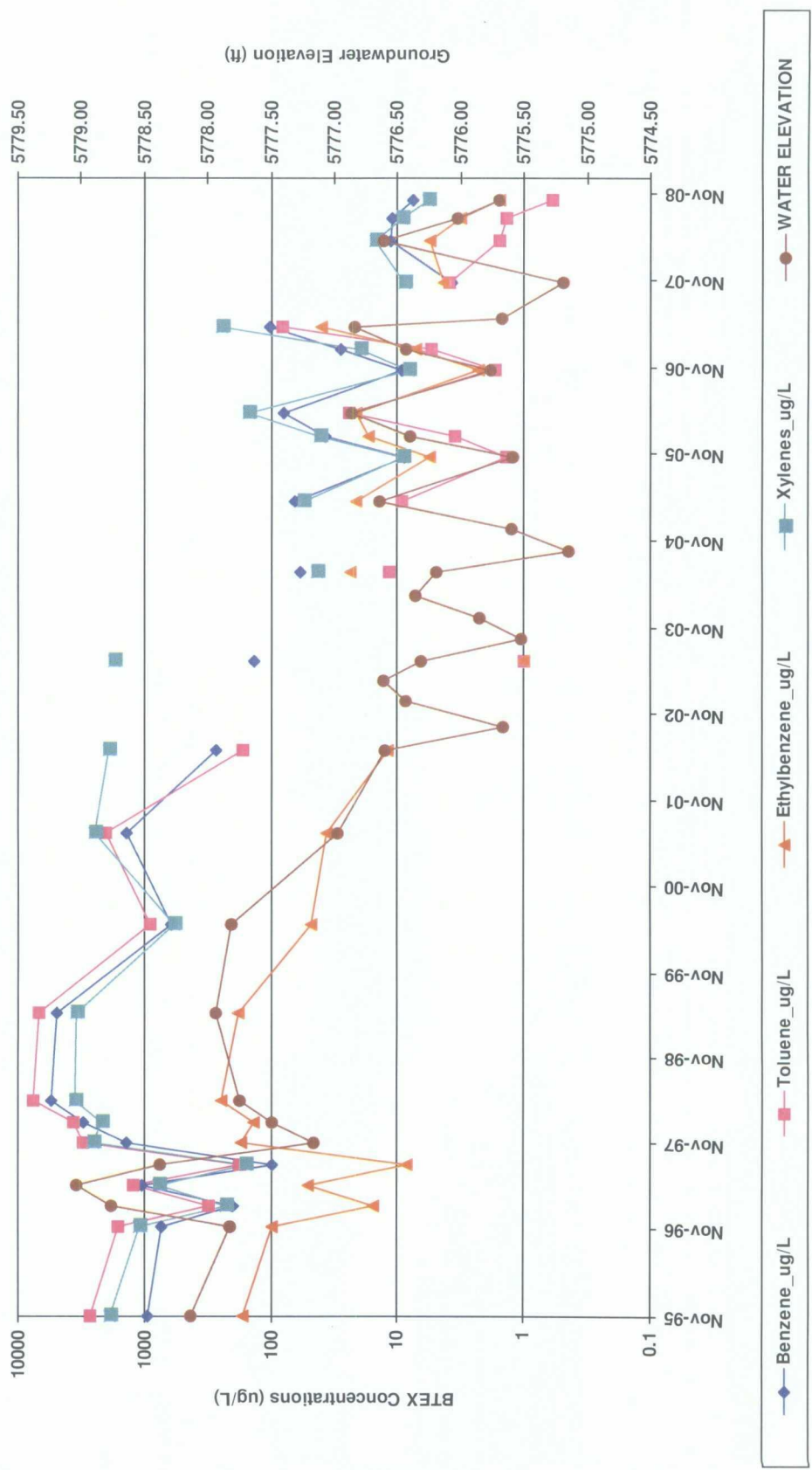


FIGURE 5
SUMMARY OF BTX COMPOUNDS IN GROUNDWATER SAMPLES
LAT 0-21 LINE DRIP (METER #LD151)
MW02

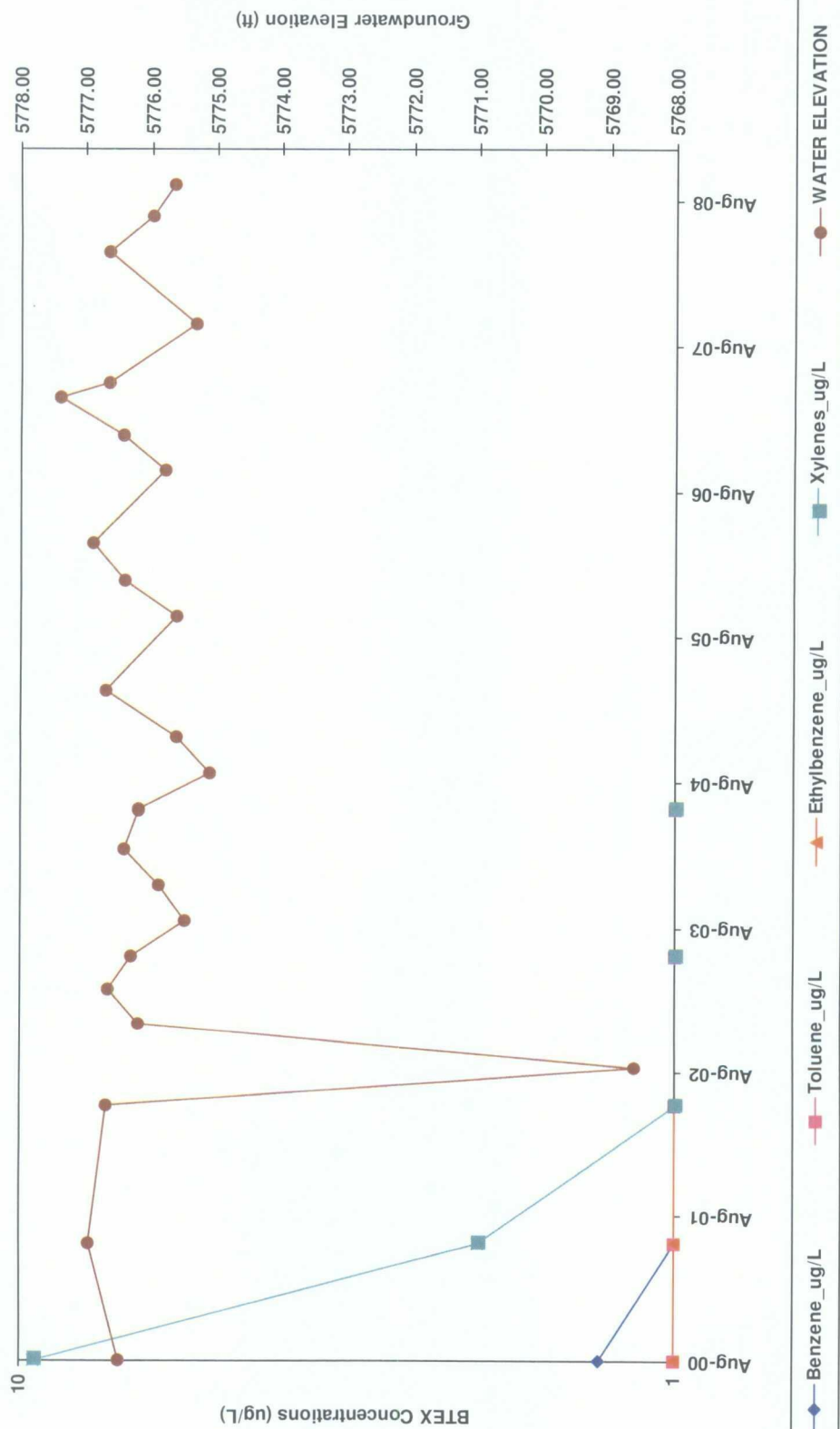


FIGURE 6
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
LAT 0-21 LINE DRIP (METER #LD151)
MW03

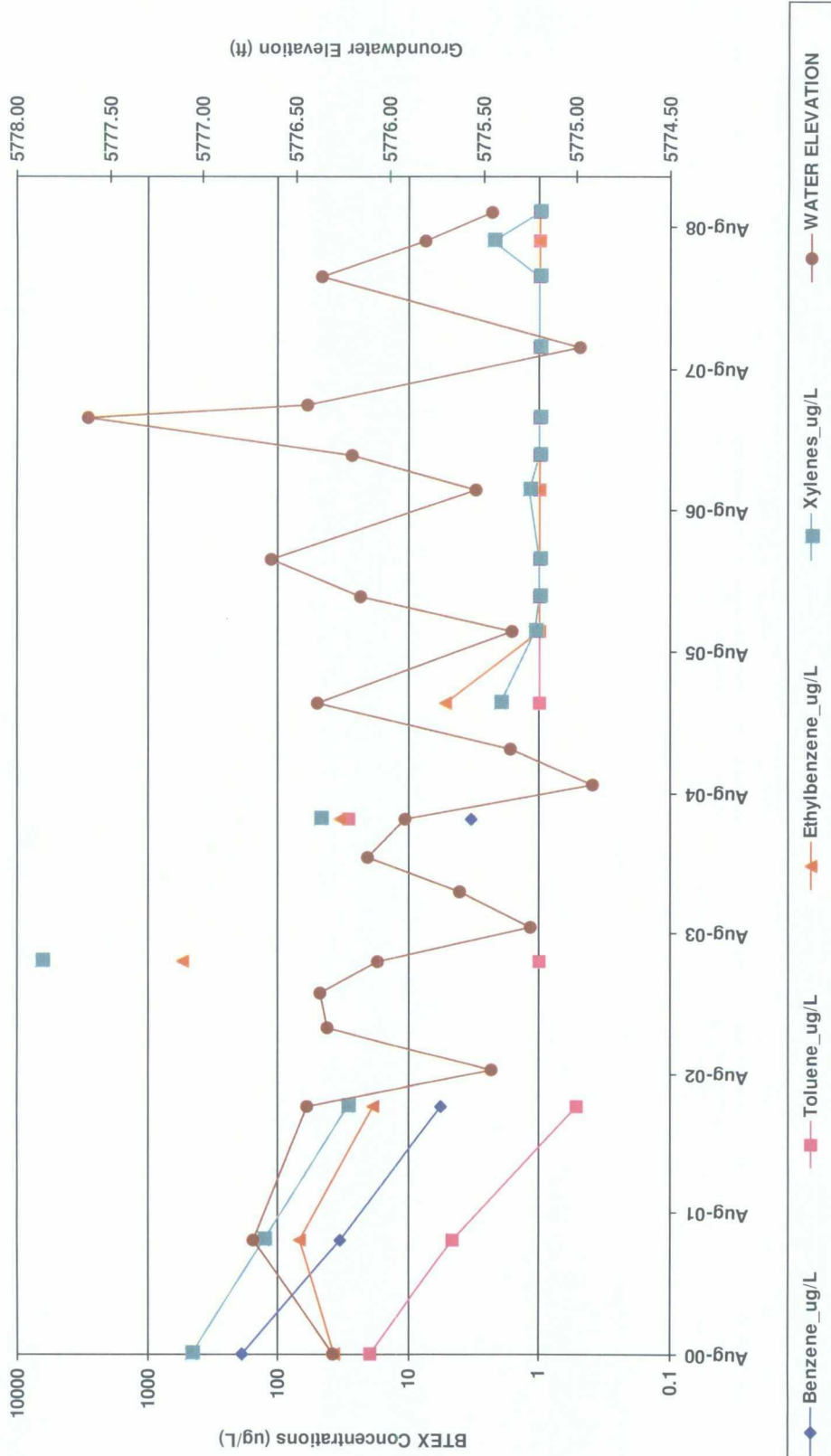


TABLE 1

**SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
LAT 0-21 LINE DRIP (METER #LD151)**

Monitoring Well	Sample Date	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Total Xylenes (ug/L)	Depth to Water (ft BTOC)
MW01	11/6/1995	935	2700	168	1890	34.45
	11/12/1996	741	1620	99	1100	34.75
	2/11/1997	202	313	15.6	230	33.82
	5/8/1997	1050	1220	50.8	764	33.54
	8/5/1997	99.5	179	8.42	160	34.20
	11/4/1997	1370	3040	174	2530	35.42
	2/3/1998	3000	3600	138	2180	35.08
	5/7/1998	5380	7500	247	3500	34.83
	5/18/1999	4860	6810	183	3450	34.64
	5/26/2000	620	900	49	580	34.76
	6/18/2001	1400	2000	37	2500	35.60
	6/4/2002	270	170	12	1900	35.98
	6/18/2003	137	1	1	1730	36.26
	6/23/2004	59.9	11.8	23.8	44.1	36.38
	4/18/2005	66.6	9.3	21.5	56.5	35.93
	10/22/2005	8.9	1.4	5.6	9.1	36.99
	1/19/2006	37.6	3.6	17.4	42	36.18
	4/24/2006	81.4	24.5	21.8	152	35.71
	10/24/2006	9.4	1.7	2.3	8.2	36.81
	1/19/2007	28.7	5.5	7.3	19.8	36.14
	4/24/2007	104	82.1	41	244	35.73
	10/25/2007	3.8	4	4.4	8.8	37.39
	4/21/2008	11.6	1.6	5.7	15.1	35.97
	7/23/2008	11.2	1.4	3.2	9.3	36.55
	10/8/2008	7.6	0.61	1.6	5.8	36.88
MW02	8/30/2000	1.3	1	1	9.5	33.62
	6/18/2001	1	1	1	2	33.16
	6/4/2002	1	1	1	1	33.42
	6/18/2003	1	1	1	1	33.80
	6/23/2004	1	1	1	1	33.92
MW03	8/30/2000	190	20	37	460	34.56
	6/18/2001	34	4.7	68	130	34.14
	6/4/2002	5.7	0.52	19	30	34.42
	6/18/2003	1	1	540	6490	34.80
	6/23/2004	3.3	28.9	34	48.4	34.95

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

TABLE 1

SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
LAT 0-21 LINE DRIP (METER #LD151)

Monitoring Well	Sample Date	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Total Xylenes (ug/L)	Depth to Water (ft BTOC)
MW03	4/18/2005	1	1	5.3	2	34.48
	10/22/2005	1	1	1	1.1	35.52
	1/19/2006	1	1	1	1	34.71
	4/24/2006	1	1	1	1	34.23
	10/24/2006	1	1	1	1.2	35.33
	1/19/2007	1	1	1	1	34.66
	4/24/2007	1	1	1	1	33.25
	10/25/2007	1	1	1	1	35.88
	4/21/2008	1	1	1	1	34.50
	7/23/2008	1	1	1	2.3	35.06
	10/8/2008	1	1	1	1	35.41

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

TABLE 2

**SUMMARY OF FREE-PRODUCT REMOVAL
LAT 0-21 LINE DRIP (METER #LD151)**

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	6/4/2002		35.98	0.00	0.25	0.25
	9/10/2002	36.85	37.145	0.30	0.00	0.25
	12/30/2002	36.08	36.39	0.31	0.00	0.25
	3/27/2003		35.96	0.00	0.00	0.25
	6/18/2003		36.26	0.00	0.00	0.25
	9/16/2003		37.06	0.00	0.00	0.25
	12/17/2003		36.72	0.00	0.00	0.25
	3/16/2004		36.22	0.00	0.00	0.25
	6/22/2004		36.38	0.00	0.00	0.25
	9/21/2004		37.43	0.00	0.00	0.25
	12/21/2004		36.98	0.00	0.00	0.25
	4/18/2005		35.93	0.00	0.00	0.25
MW03	9/10/2002	35.285	35.92	0.63	0.00	0.00
	12/30/2002	34.42	34.97	0.55	0.00	0.00
	9/16/2003	35.62	35.64	0.02	0.01	0.01
	12/17/2003		35.24	0.00	0.00	0.01
	3/16/2004		34.75	0.00	0.00	0.01
	6/22/2004		34.95	0.00	0.00	0.01
	9/21/2004		35.95	0.00	0.00	0.01
	12/21/2004		35.51	0.00	0.00	0.01
	4/18/2005		34.48	0.00	0.00	0.01