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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 Stavinocha 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 Stavinocha – 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.



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**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Miles Fed 1A
Meter Code: 94810**

SITE DETAILS

Legal Description:	Town:	26N	Range:	7W	Sec:	5	Unit:	F
NMOCD Haz Ranking:	40	Land Type:	Federal	Operator:	Louis Dreyfus Natural Gas			

PREVIOUS ACTIVITIES

Site Assessment:	5/94	Excavation:	6/94	Soil Boring:	9/95
Monitor Well:	9/95	Geoprobe:	2/97	Additional MWs:	10/99
Downgradient MWs:	10/99	Replace MW:	NA	Quarterly Initiated:	NA
ORC Nutrient Injection:	NA	Re-Excavation:	NA	PSH Removal Initiated:	2/99
Annual Initiated:	10/99	Quarterly Resumed:	NA	PSH Removal in 2008?	No

SUMMARY OF 2008 ACTIVITIES

MW-1: Annual groundwater sampling (April) and quarterly water level monitoring were performed during 2008.

MW-2: Annual groundwater sampling (April) and quarterly water level monitoring were performed during 2008.

MW-3: Annual groundwater sampling (April) and quarterly water level monitoring were performed during 2008.

Site-Wide Activities: The Site was inspected quarterly for hydrocarbon seeps. No seeps were detected.

SITE MAP

A Site map (April) is attached as Figure 1.

SUMMARY TABLES AND GRAPHS

- Historic analytical and water level data are summarized in Table 1 and presented graphically in Figures 2 through 4. Where applicable, static water level elevations were corrected for measurable thicknesses of free-product (specific gravity of 0.8).
- Historic free product recovery data are summarized on Table 2 and presented graphically in Figure 5.

**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Miles Fed 1A
Meter Code: 94810**

- The 2008 laboratory report is presented in Attachment 1 (included on CD).
- 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

No wastes were generated in 2008.

ISOCONCENTRATION MAPS

No isoconcentration maps were prepared for this Site; however, the attached Site map presents the analytical data and potentiometric surface contours from the April 2008 sampling event.

RESULTS

- The groundwater flow direction at this Site is toward the northeast.
- No free-product was observed in 2008. The cumulative total free-product recovered to date is approximately 12 gallons.
- The benzene and total xylenes concentrations in the MW-1 groundwater sample were 122 µg/L and 2,550 µg/L, respectively, both in excess of their NMWQCC standards. Toluene and ethylbenzene were detected, but were below their respective standards. Overall, it appears that benzene and toluene have attenuated by approximately one order of magnitude since 1996; while ethylbenzene and total xylenes have remained at steady levels. This pattern fits with the expected natural attenuation based on relative solubility and volatility.
- BTEX constituents were not detected in the MW-2 or MW-3 groundwater samples. These results are consistent with the historical data for these two wells.
- Site-wide decreases in BTEX concentrations provide evidence that natural attenuation is occurring at the Site.
- No seeps along the well pad slopes were noted during 2008.

**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Miles Fed 1A
Meter Code: 94810**

RECOMMENDATIONS

- On a quarterly basis, EPTPC will gauge water levels at the Site and inspect the well pad slopes for evidence of seeps. If free-product is observed, recovery activities will be re-initiated. If a seep is found, photographic documentation will be made and the seep will be sampled.
- If free-product continues to be absent from MW-1, this well will be sampled on an annual basis until sample results approach closure criteria. The well will then be scheduled for quarterly sampling until closure criteria are met.
- MW-2 and MW-3 will be sampled in conjunction with MW-1.

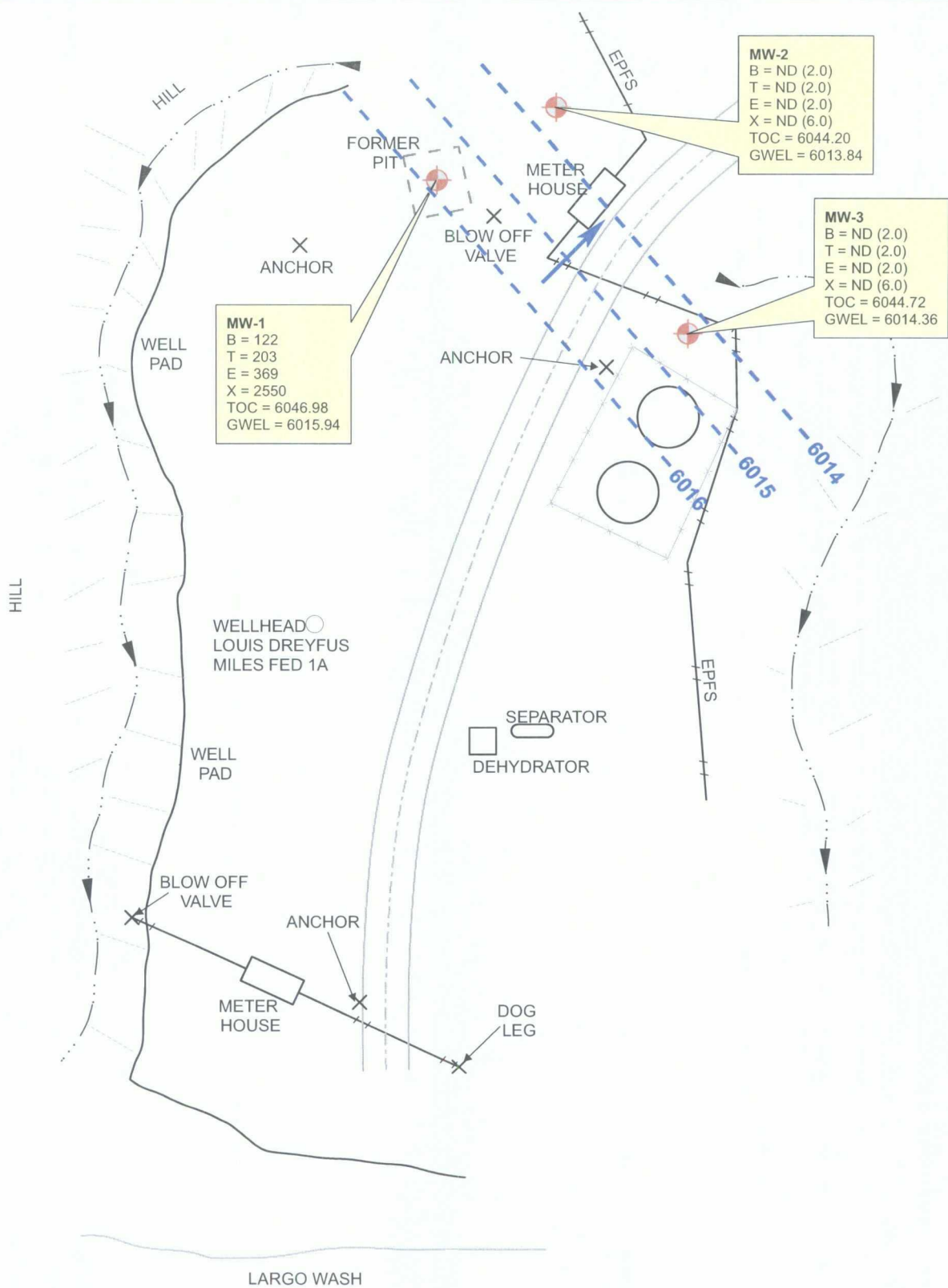


FIGURE 2
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
MILES FED 1A (METER #94810)
MW01

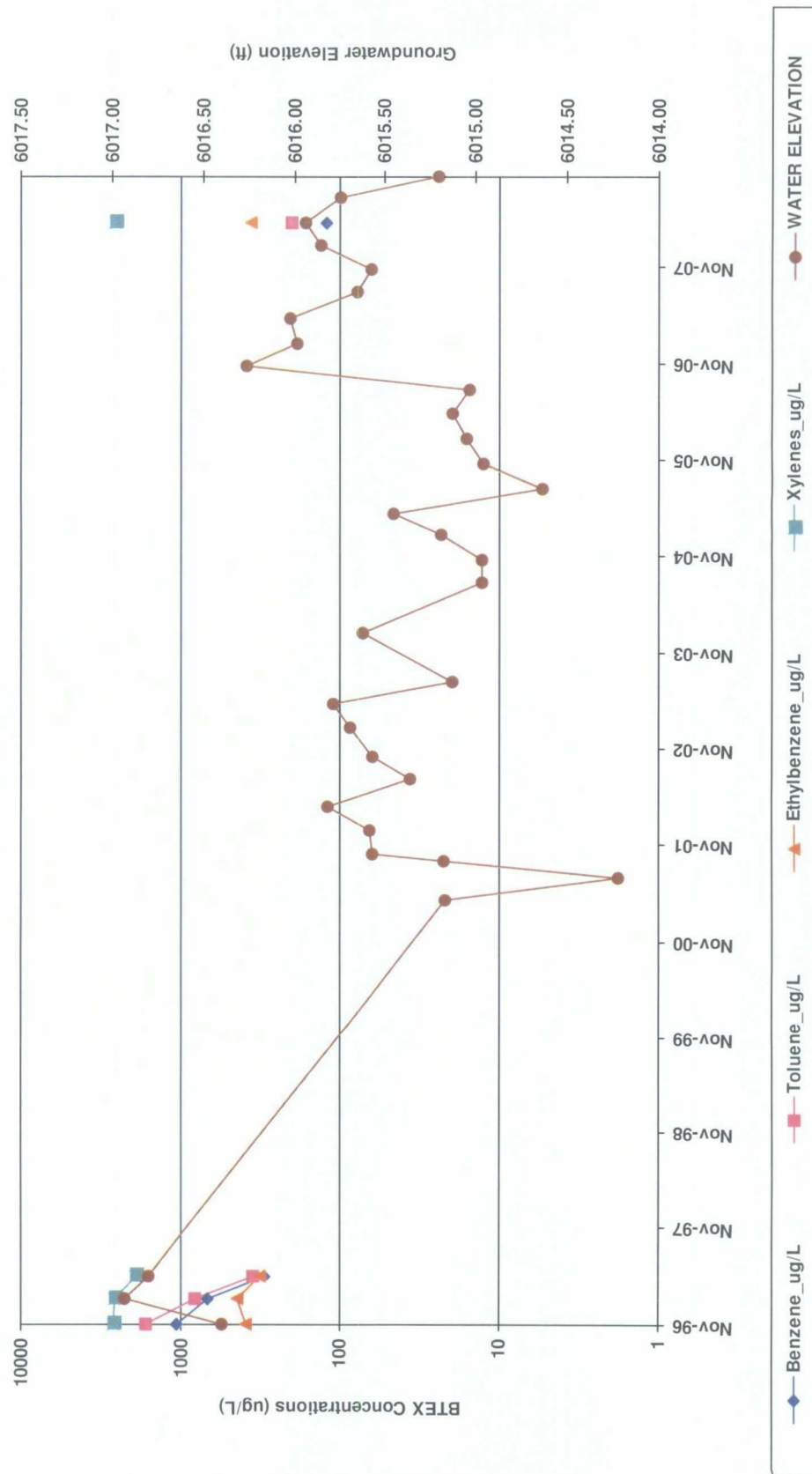


FIGURE 3
SUMMARY OF BTX COMPOUNDS IN GROUNDWATER SAMPLES
MILES FED 1A (METER #94810)
MW02

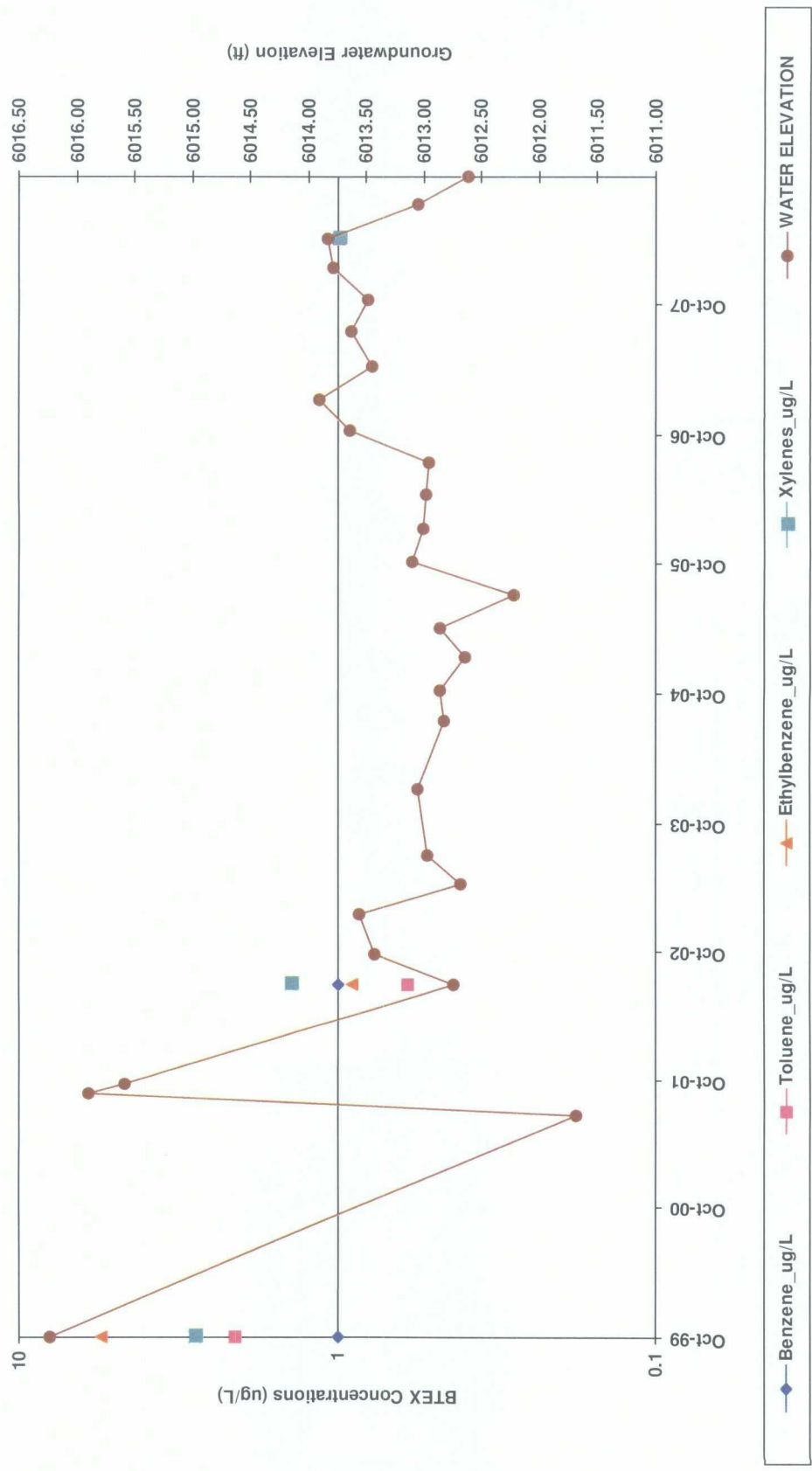


FIGURE 4
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
MILES FED 1A (METER #94810)
MW03

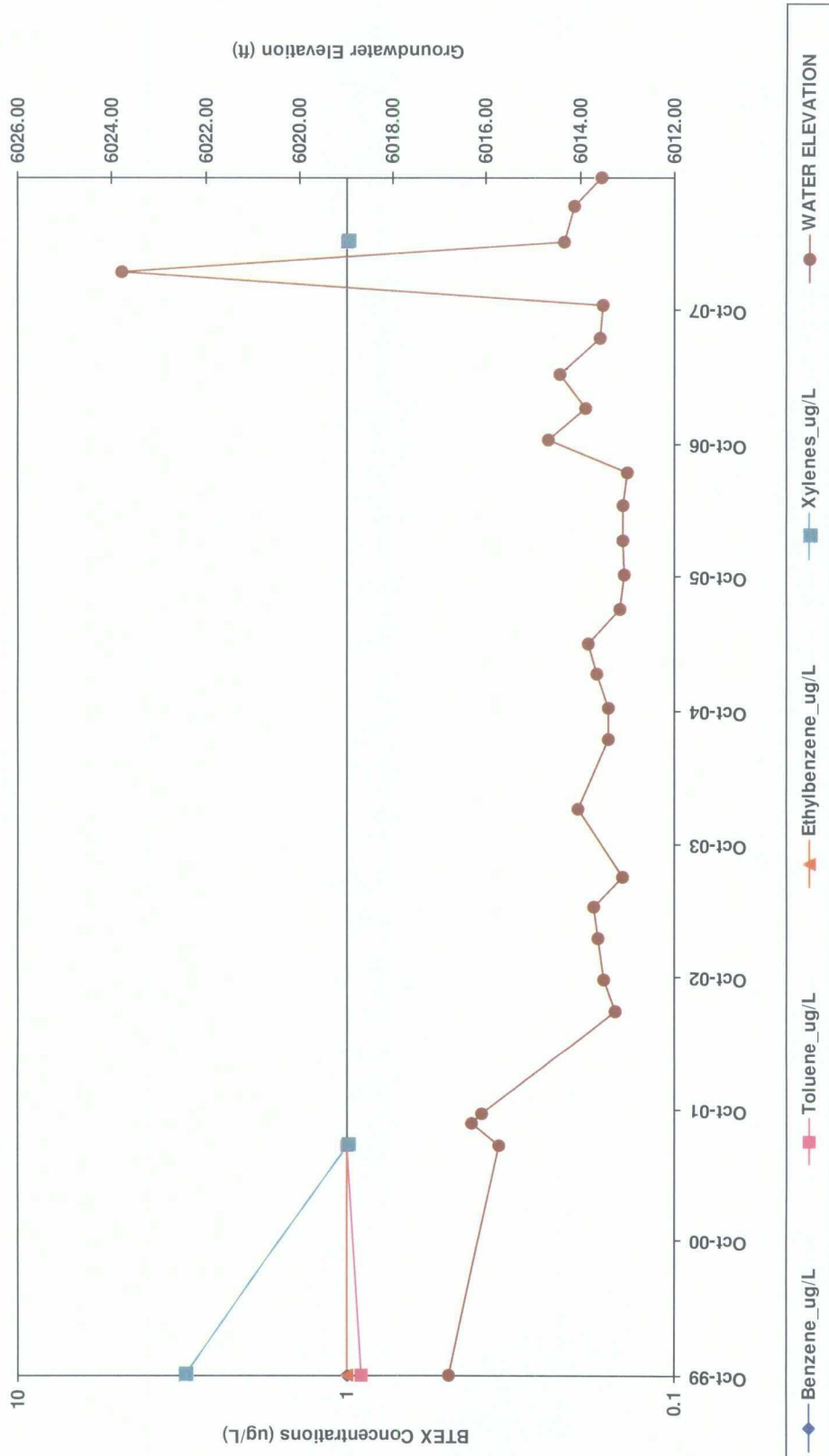


FIGURE 5
SUMMARY OF FREE-PRODUCT REMOVAL
MILES FED 1A (METER #94810)
MW01

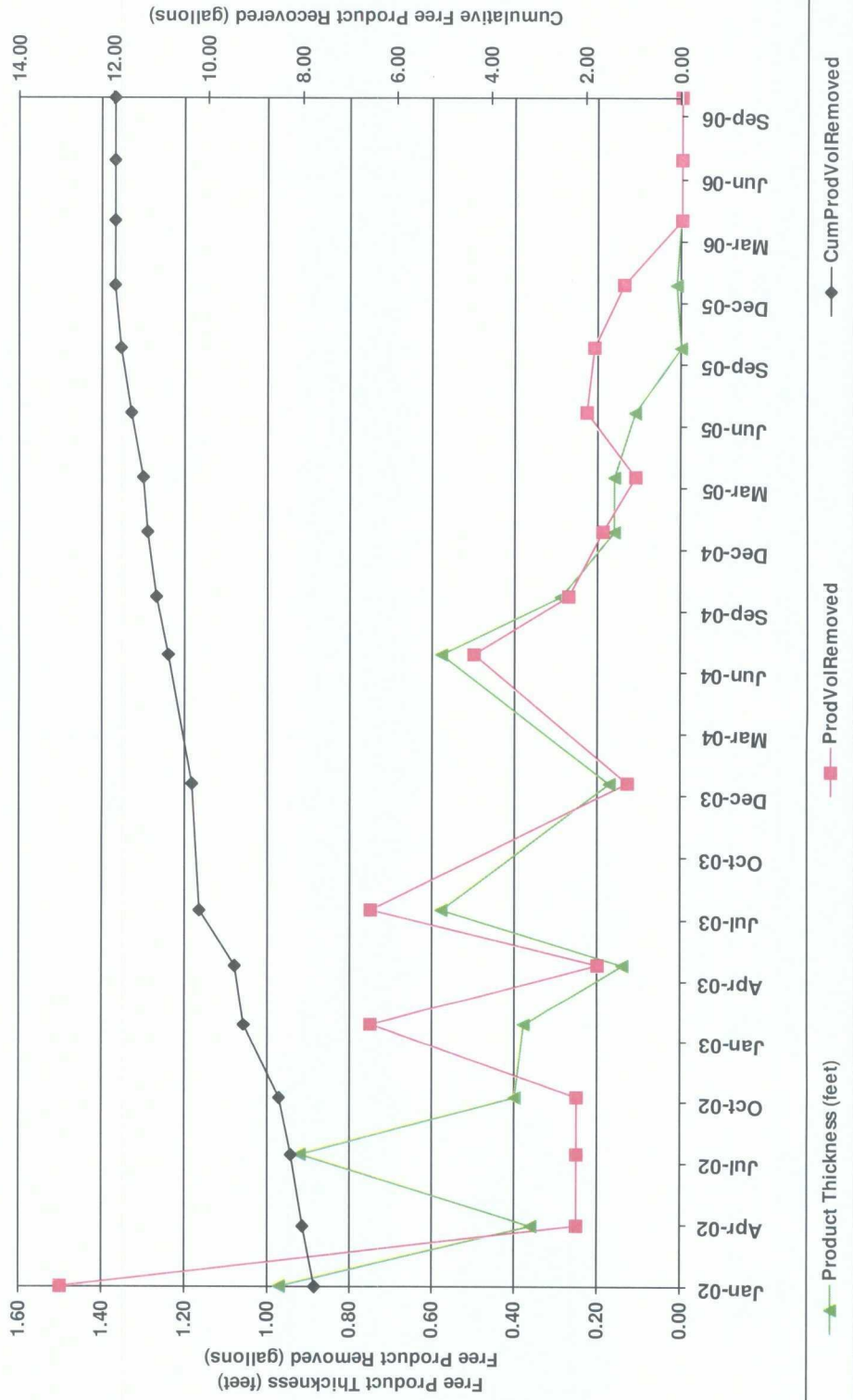


TABLE 1

SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
MILES FED 1A (METER #94810)

Monitoring Well	Sample Date	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Total Xylenes (ug/L)	Depth to Water (ft BTOC)
MW01	11/5/1996	1050	1630	391	2620	30.58
	2/7/1997	671	809	439	2550	30.05
	5/6/1997	300	350	320	1880	30.18
	4/17/2008	122	203	369	2550	31.04
MW02	10/15/1999	1	2.1	5.5	2.8	27.97
	7/15/2002	1	0.6	0.9	1.4	31.46
	4/17/2008	1	1	1	1	30.36
MW03	10/15/1999	1	0.9	1	3.1	27.92
	7/3/2001	1	1	1	1	28.97
	4/17/2008	1	1	1	1	30.36

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

TABLE 2

**SUMMARY OF FREE-PRODUCT REMOVAL
MILES FED 1A (METER #94810)**

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	1/2/2002	31.20	32.17	0.97	1.50	7.75
	4/1/2002	31.09	31.45	0.36	0.25	8.00
	7/15/2002	31.43	32.35	0.92	0.25	8.25
	10/8/2002	31.33	31.73	0.40	0.25	8.50
	1/27/2003	31.21	31.59	0.38	0.75	9.25
	4/26/2003	31.16	31.30	0.14	0.20	9.45
	7/17/2003	31.73	32.31	0.58	0.75	10.20
	1/19/2004	31.32	31.49	0.17	0.13	10.33
	7/27/2004	31.89	32.47	0.58	0.50	10.83
	10/20/2004	31.95	32.24	0.29	0.27	11.09
	1/25/2005	31.75	31.91	0.16	0.19	11.28
	4/14/2005	31.52	31.52	0.00	0.11	11.39
	7/19/2005	32.32	32.43	0.11	0.23	11.62
	10/21/2005		32.02	0.00	0.21	11.83
	1/23/2006	31.92	31.93	0.01	0.14	11.97
	4/28/2006		31.85	0.00	0.00	11.97
	7/26/2006		31.94	0.00	0.00	11.97
	10/24/2006		30.71	0.00	0.00	11.97