

3R - 312

**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 Randelman #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 Randelman 1 well site and the Honolulu Loop Line Drip to your attention. The Randelman 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 Randelman 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

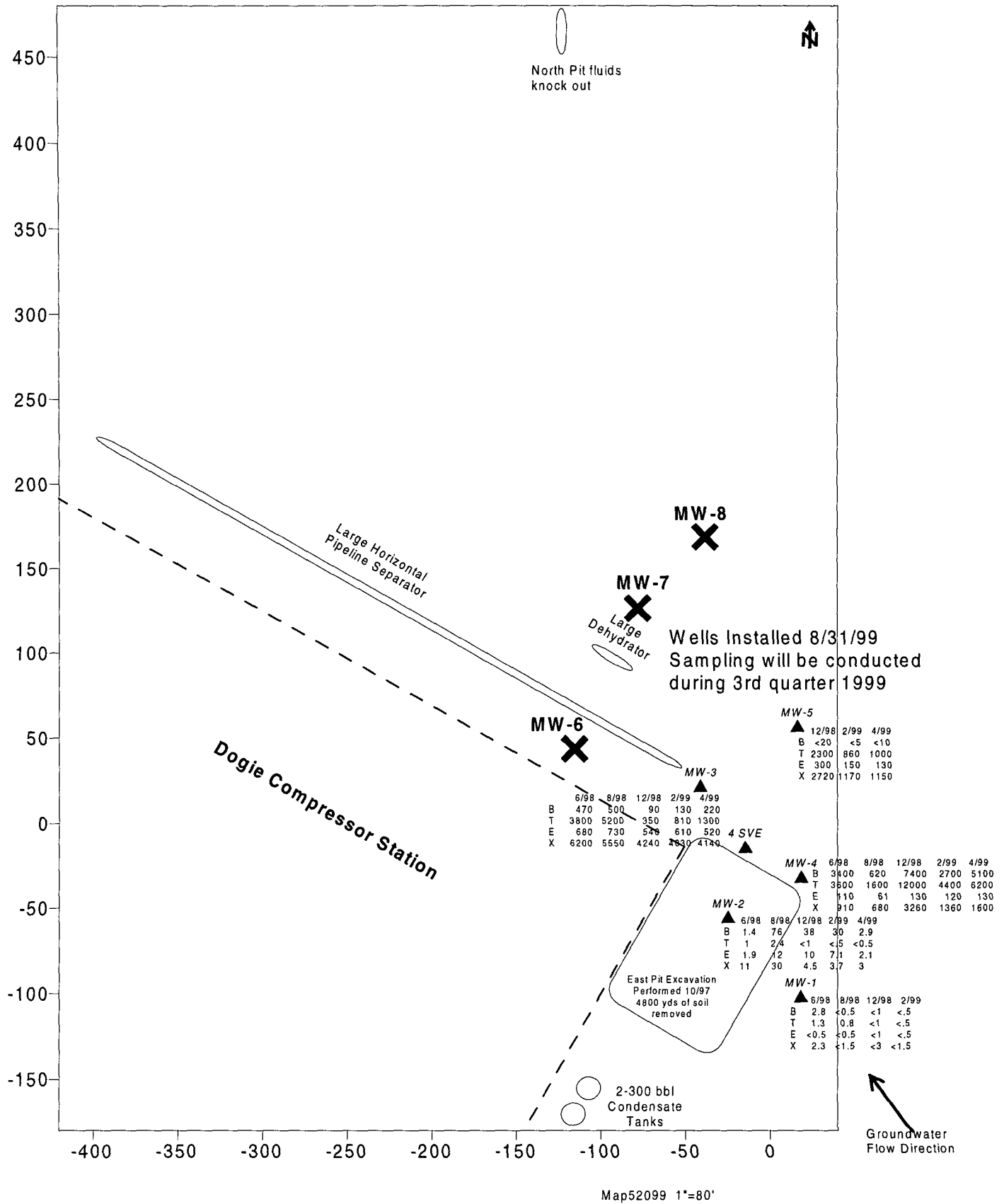


Maureen Gannon
Project Manager

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 6.
Dogie Compressor Station East Pit Site Map and Analytical Results
Groundwater Concentrations in ppb



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

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

August 1, 1997

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



RE: NOTIFICATION OF GROUNDWATER CONTAMINATION AT THE DOGIE COMPRESSOR STATION EAST PIT

Dear Bill:

Pursuant to New Mexico Water Quality Control Commission (WQCC) Regulations, section 1-203, PNM hereby provides written notification of groundwater contamination in the area underneath PNM's former east pit located at the Dogie Compressor Station. The Dogie Compressor Station is situated in the NW ¼ of section 4, township 25N, range 6 W. A topographic map showing the location of the site is provided as an attachment. The operator is Williams Field Services. This letter follows verbal notification provided to you on Monday, July 28, 1997 (M. Gannon, PNM to B. Olson, OCD).

On July 9, 1997 while excavating the east pit, PNM technicians encountered groundwater at approximately 14 feet below ground surface. 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	1538
Toluene	ppb	750	4314
Ethylbenzene	ppb	750	152
Xylenes	ppb	620	1387
Total BTEX	ppb		7391

Bold type indicates a WQCC exceedance.

This letter serves as written notification of groundwater contamination under the east pit at the Dogie Compressor Station. 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, reading "Maureen Gannon", is written over a horizontal line.

Maureen Gannon
Project Manager

Attachment

cc: Colin Adams, PNM
Denver Bearden, PNMGS
Denny Foust, OCD-Aztec Office
Ron Johnson, PNM
Robin Prisk, WFS

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: *23-Jul-97*
COC No.: *5925*
Sample No.: *15301*
Job No.: *2-1000*

Project Name: *PNM Gas Services - Dogie Compressor Station East Pit*
Project Location: *9707100830; 16' depth*
Sampled by: *GC* Date: *10-Jul-97* Time: *8:30*
Analyzed by: *DC* Date: *17-Jul-97*
Sample Matrix: *Liquid*

Parameter	Results as Received	Unit of Measure	Limit of Quantitation	Unit of Measure
<i>Benzene</i>	<i>1538</i>	<i>ug/L</i>	<i>20</i>	<i>ug/L</i>
<i>Toluene</i>	<i>4314</i>	<i>ug/L</i>	<i>20</i>	<i>ug/L</i>
<i>Ethylbenzene</i>	<i>152</i>	<i>ug/L</i>	<i>20</i>	<i>ug/L</i>
<i>m,p-Xylene</i>	<i>1085</i>	<i>ug/L</i>	<i>20</i>	<i>ug/L</i>
<i>o-Xylene</i>	<i>302</i>	<i>ug/L</i>	<i>20</i>	<i>ug/L</i>
<i>TOTAL</i>	<i>7391</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: *7/23/97*

P.O. BOX 2606 • FARMINGTON, NM 87499

OFF: (505) 325-5667

ON SITE

TECHNOLOGIES, LTD.

LAB: (505) 325-1556

QUALITY ASSURANCE REPORT

for EPA Method 8020

Date Analyzed: 17-Jul-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	RPD	Limit
Benzene	ppb	20.0	20.6	3	15%
Toluene	ppb	20.0	21.0	5	15%
Ethylbenzene	ppb	20.0	21.4	7	15%
m,p-Xylene	ppb	40.0	40.1	0	15%
o-Xylene	ppb	20.0	21.0	5	15%

Matrix Spike

Parameter	1 - Percent Recovered	2 - Percent Recovered	Limit	RPD	Limit
Benzene	99	95	(39-150)	3	20%
Toluene	101	94	(46-148)	3	20%
Ethylbenzene	106	103	(32-160)	3	20%
m,p-Xylene	100	96	(35-145)	3	20%
o-Xylene	104	101	(35-145)	3	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)	
15301-5925	95				
					(PC)
					7/23/97

S1: Fluorobenzene



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 1756	Date 7/29/97
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Originating Party	Other Parties
Maureen Gannon - PNM	Bill Olson - Environmental Bureau (voice mail)

Subject
Dogie Canyon Compressor Station - East pit

Discussion
Ground water contamination discovered at the east pit
at Dogie Canyon Compressor Station
Location - NW1/4 sec 4, T24N R6W

OTW = 16'
Benzene = 1538 ppb
BTEX = 7300 ppb.

Conclusions or Agreements

Distribution Signed Bill Olson

cc: Penny Faust - OCD Arfax
File