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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)

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**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

Standard Oil Com #1

Meter Code: 70445

SITE DETAILS

Legal Description:	Town: 29N	Range: 9W	Sec: 36	Unit: N
NMOCD Haz Ranking:	30	Land Type: State	Operator: Burlington Resources	

PREVIOUS ACTIVITIES

Site Assessment:	5/94	Excavation:	5/94 (60 cy)	Soil Boring:	9/95
Monitor Well:	9/95	Geoprobe:	7/97	Additional MWs:	12/01
Downgradient MWs:	12/01	Replace MW:	NA	Quarterly Initiated:	11/96
ORC Nutrient Injection:	NA	Re-Excavation:	NA	PSH Removal Initiated:	NA
Annual Initiated:	NA	Quarterly Resumed:	NA	PSH Removal in 2008?:	No

SUMMARY OF 2008 ACTIVITIES

MW-1: Annual groundwater sampling (June) was performed in 2008.

MW-2: Annual groundwater sampling (June) was performed in 2008.

MW-3: Annual water level monitoring (June) was performed in 2008.

MW-4: Annual water level monitoring (June) was performed in 2008.

MW-5: Annual groundwater sampling (June) was performed in 2008.

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

SITE MAPS

A Site map (June 2008) is attached as Figure 1.

**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Standard Oil Com #1
Meter Code: 70445**

SUMMARY TABLES AND GRAPHS

- Historic analytical and water level data are summarized in Table 1 and presented graphically in Figures 2 through 6.
- 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

All purge water was taken to the El Paso Natural Gas Rio Vista Compressor Station.

ISOCONCENTRATION MAPS

No isoconcentration maps were generated for this Site; however, the attached Site map presents the analytical data collected during 2008.

RESULTS

- The groundwater flow direction at this Site is generally toward the west-northwest.
- Benzene in the sample collected from MW-1 was above the NMWQCC standard, at 45.4 µg/L. The remaining BTEX constituents were below their respective standards. As a long-term trend, concentrations have attenuated significantly in this well.
- The benzene concentration in the sample collected from MW-2 was above the standard, at 480 µg/L. The remaining BTEX constituents were below their respective standards. As a long-term trend, BTEX concentrations have attenuated significantly in this well.
- In 1997, temporary piezometer data were collected that indicated other potential sources of contamination at the Site. Piezometer locations are shown on Figure 1.
- Monitoring wells MW-3 and MW-4 have historically had high levels of BTEX constituents that are not believed to be from the former EPTPC pit. These wells are therefore only used for water level monitoring.
- The annual samples collected from new monitor well MW-5 in 2007 and 2008 have both appeared clean with respect to BTEX.

**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
Q3906	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.



**2008 ANNUAL GROUNDWATER REPORT
FEDERAL SITES VOLUME I
EL PASO TENNESSEE PIPELINE COMPANY**

TABLE OF CONTENTS

METER or LINE ID	NMOC 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



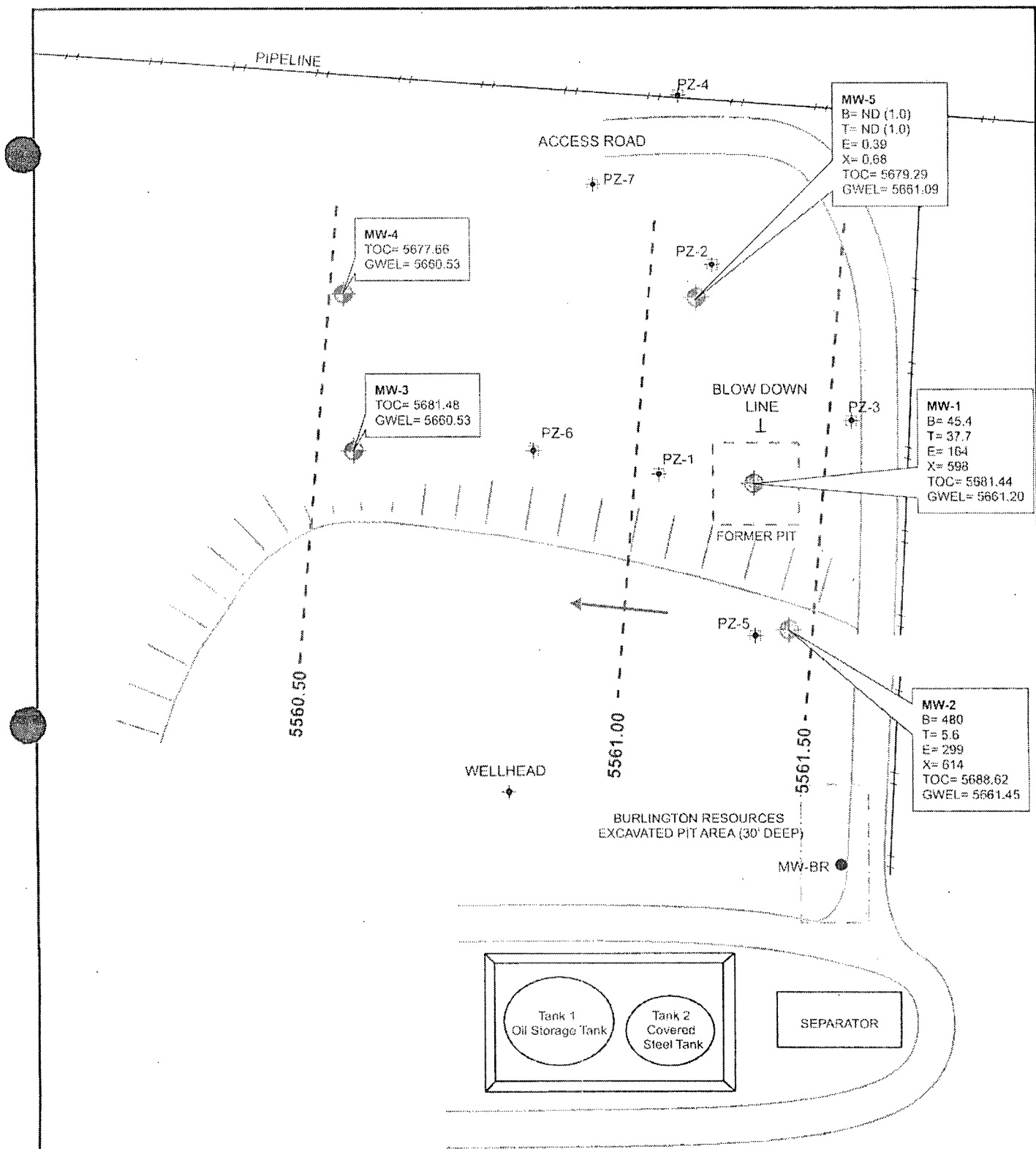
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**EPTPC GROUNDWATER SITES
2008 ANNUAL GROUNDWATER REPORT**

**Standard Oil Com #1
Meter Code: 70445**

RECOMMENDATIONS

- EPTPC recommends that sampling at MW-1, MW-2, and MW-5 be performed on an annual basis until BTEX concentrations approach closure criteria. These wells will then be scheduled for quarterly sampling until four consecutive samples are below closure standards.
- New well MW-5 helped to clarify the gradient direction at the Site. EPTPC will evaluate this Site further, and particularly the impacts observed in monitoring wells MW-3, and MW-4 and present any additional recommendations in future annual reports.



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PROJECT:

STANDARD OIL COM #1

TITLE:

Groundwater Potentiometric Surface Map,
and BTEX Concentrations - June 16, 2008

FIGURE:

1

FIGURE 2
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
STANDARD OIL COM #1 (METER #70445)
MW01

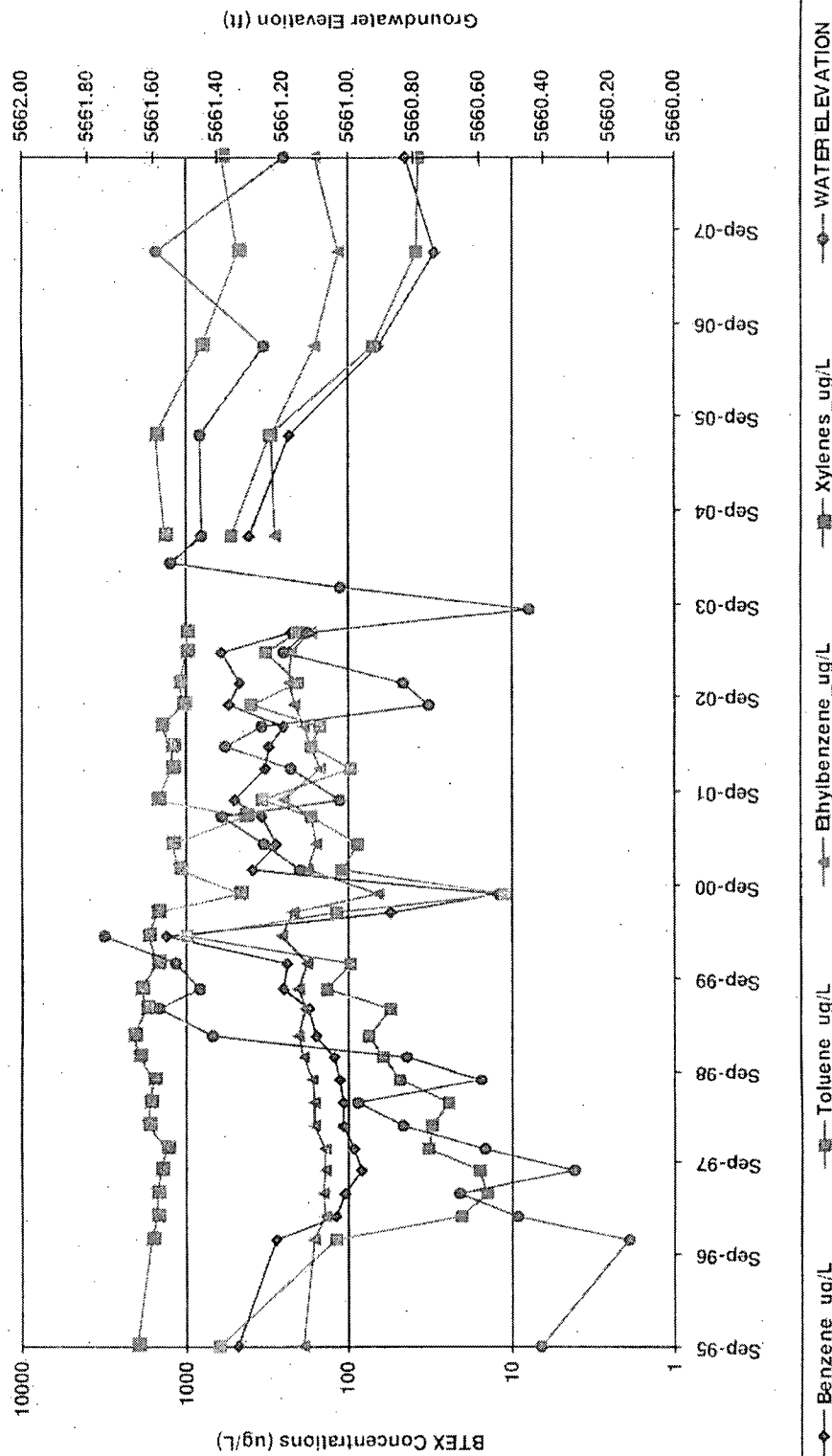


FIGURE 3
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
STANDARD OIL COM #1 (METER #70445)
MW02

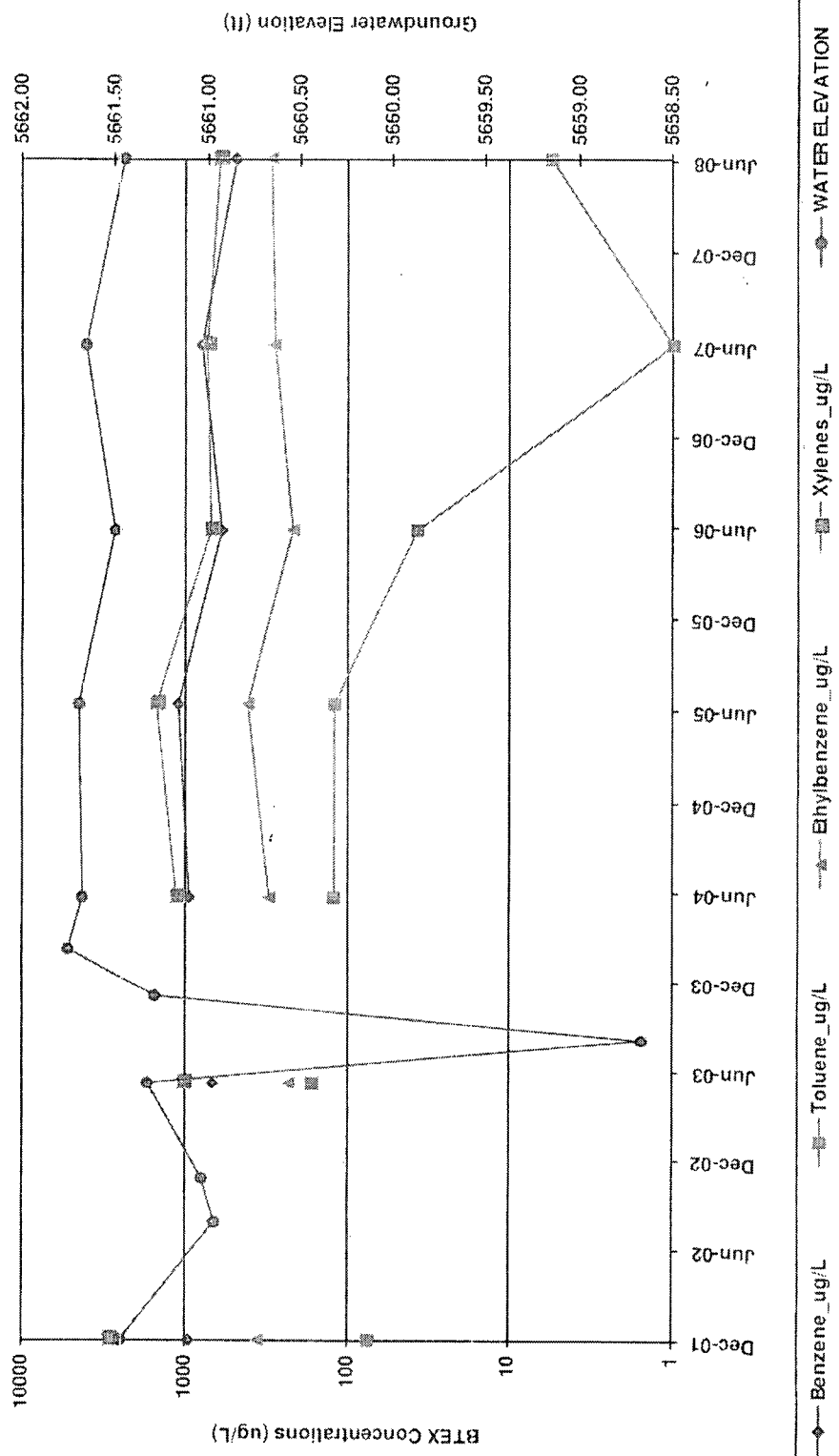


FIGURE 4
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
STANDARD OIL COM #1 (METER #70445)
MW03

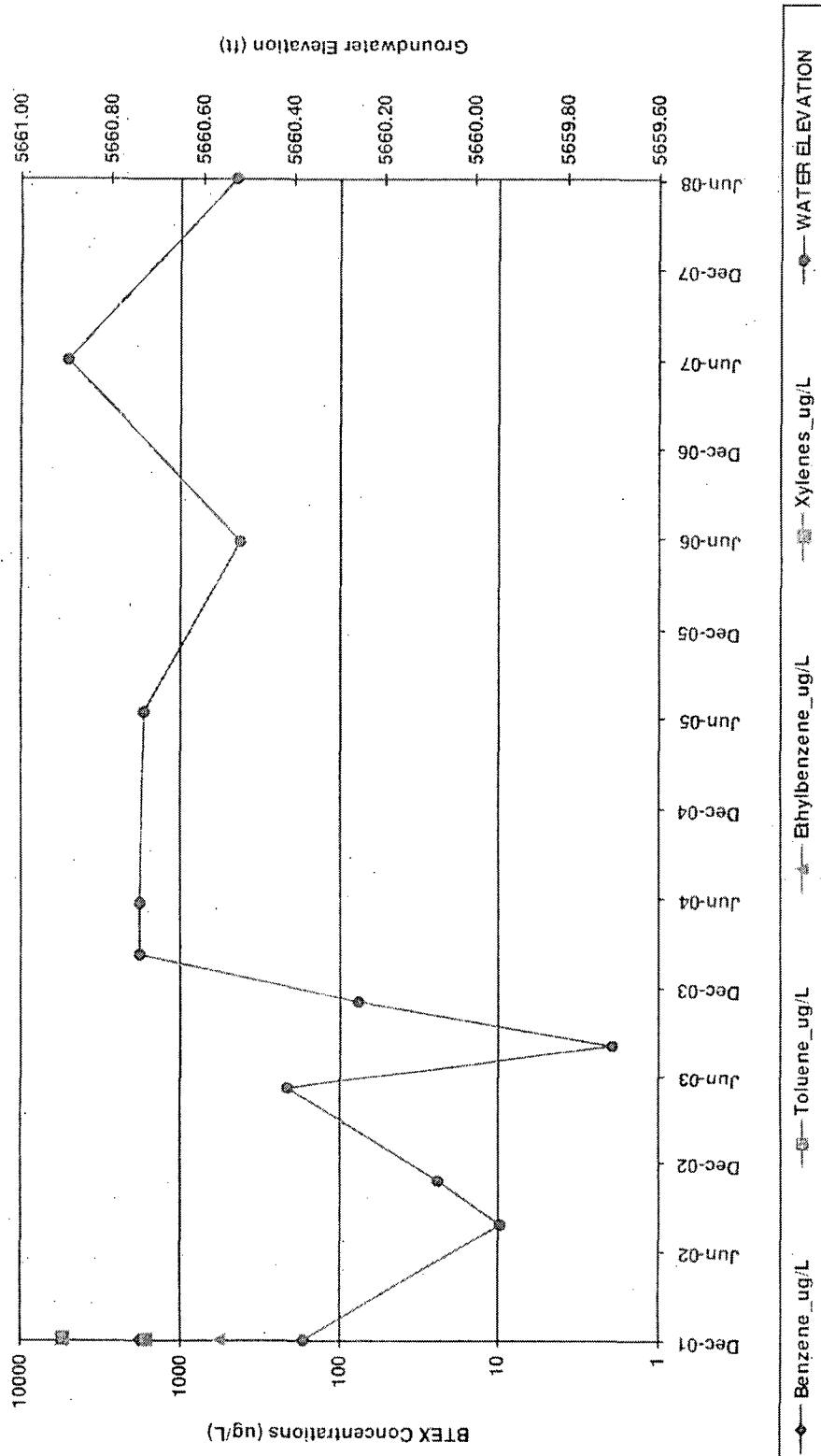


FIGURE 5
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
STANDARD OIL COM #1 (METER #70445)
MW04

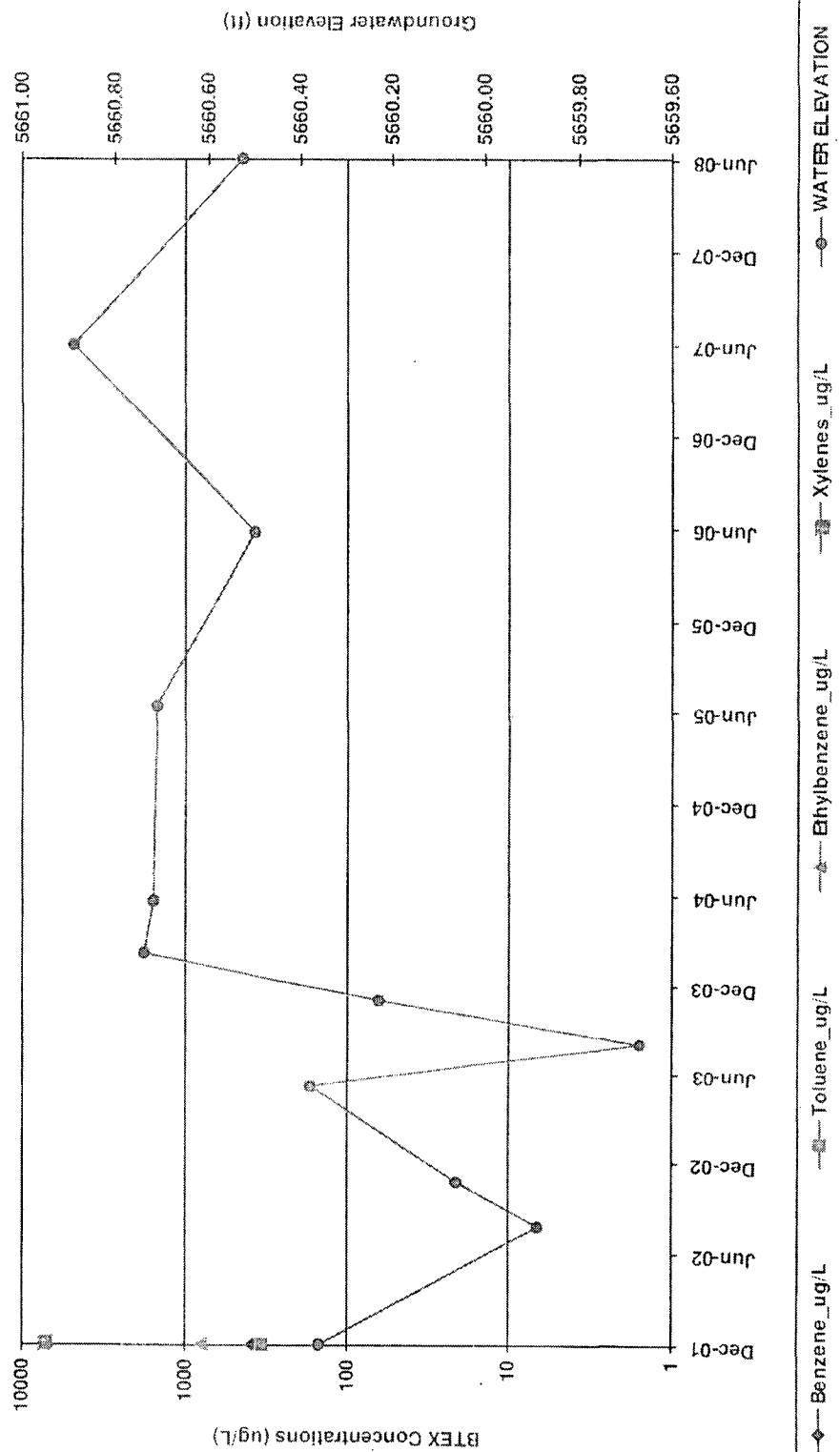


FIGURE 6
SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
STANDARD OIL COM #1 (METER #70445)
MW05

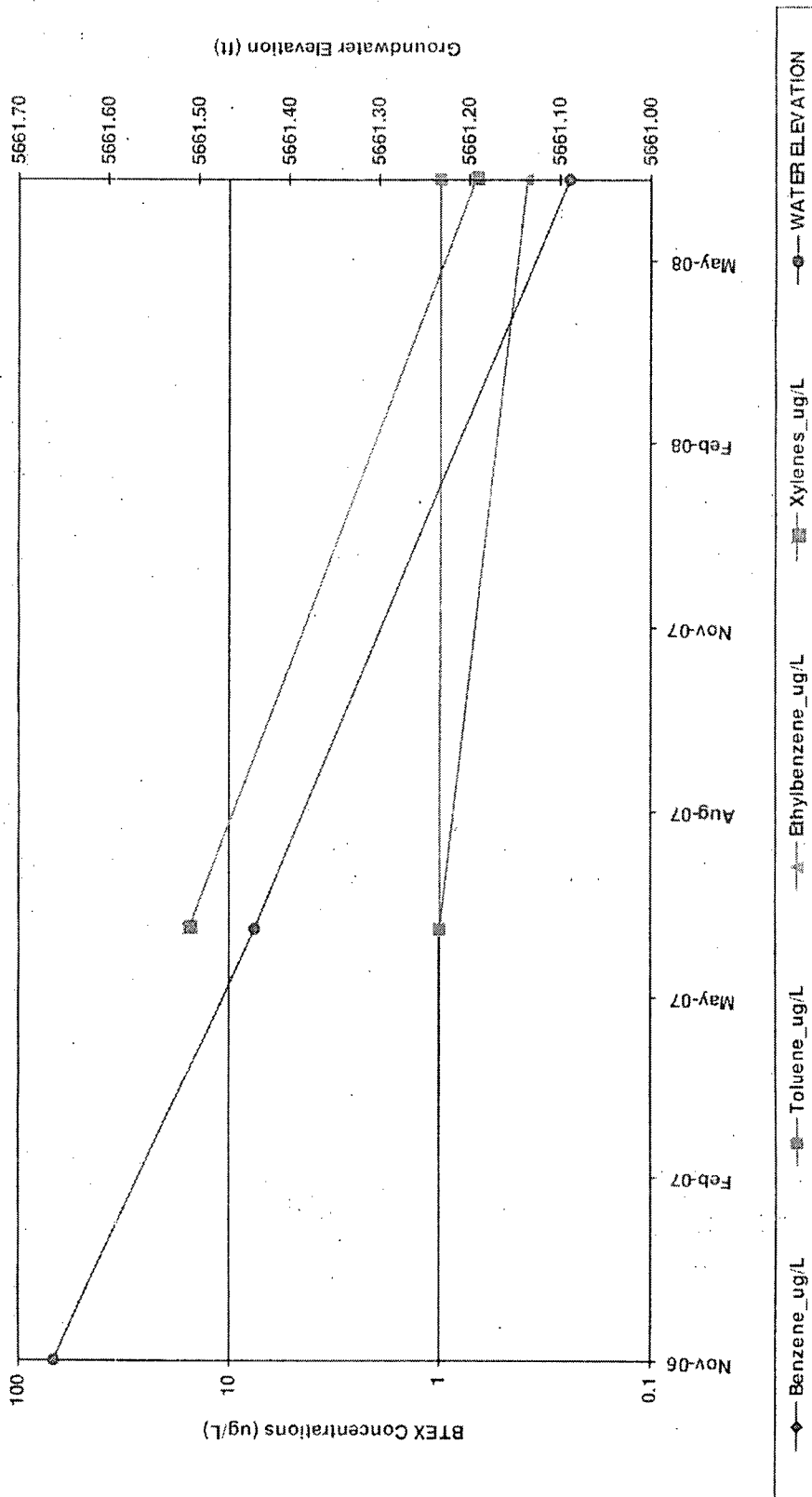


TABLE 1

**SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
STANDARD OIL COM #1 (METER #70445)**

Monitoring Well	Sample Date	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Total Xylenes (ug/L)	Depth to Water (ft BTOC)
MW01	9/12/1995	482	629	188	1980	21.03
	11/7/1996	277	121	161	1590	21.30
	2/7/1997	119	20.2	139	1490	20.96
	5/9/1997	105	14.2	145	1480	20.78
	8/8/1997	82.6	15.6	140	1400	21.13
	11/4/1997	91.4	32.4	141	1320	20.86
	2/3/1998	109	31	163	1680	20.61
	5/7/1998	107	24.2	161	1640	20.47
	8/4/1998	113	48.7	167	1580	20.85
	11/3/1998	122	61.3	190	1930	20.62
	2/2/1999	157	75.8	204	2100	20.02
	5/19/1999	178	55.2	184	1730	19.86
	8/4/1999	252	136	203	1890	19.98
	11/9/1999	240	98	180	1500	19.91
	2/25/2000	1300	1000	260	1700	19.69
	5/24/2000	56	120	220	1500	
	8/8/2000	12	11	66	470	
	11/6/2000	390	110	180	1100	20.29
	2/15/2001	280	88	160	1200	20.18
	6/4/2001	340	170	170	430	20.05
	8/7/2001	510	340	250	1500	20.41
	12/4/2001	330	98	150	1200	20.26
	2/25/2002	310	170	170	1200	20.06
	5/14/2002	250	150	190	1400	20.17
	8/6/2002	551	398	214	1041	20.69
	11/4/2002	464	207	235	1085	20.60
	2/27/2003	600	330	225	993	20.24
	5/19/2003	230	206	172	977	20.31
	6/2/2004	416	534	287	1330	19.99
	6/24/2005	234	310	305	1530	19.98
	6/7/2006	66	71.9	165	804	20.18
	6/12/2007	29.8	38.2	116	477	19.85
	6/16/2008	45.4	37.7	164	598	20.24
MW02	12/13/2001	940	74	360	2900	27.15
	5/19/2003	673	167	228	1010	27.29

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

TABLE 1

SUMMARY OF BTEX COMPOUNDS IN GROUNDWATER SAMPLES
STANDARD OIL COM #1 (METER #70445)

Monitoring Well	Sample Date	Benzene (ug/L)	Toluene (ug/L)	Ethylbenzene (ug/L)	Total Xylenes (ug/L)	Depth to Water (ft BTOC)
MW02	6/2/2004	943	120	309	1130	26.94
	6/24/2005	1090	120	418	1510	26.92
	6/7/2006	592	37.7	216	692	27.12
	6/12/2007	781	1	286	733	26.96
	6/16/2008	480	5.6	299	614	27.17
MW03	12/13/2001	1800	1600	570	5600	21.10
MW04	12/13/2001	380	340	780	7300	17.30
MW05	6/12/2007	1	1	1	15.6	17.85
	6/16/2008	1	1	0.39	0.68	18.20

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