3R – 315

2009 AGWMR

09 / 03 / 2010

Williams
Environmental Services
188 CR 4900
Bloomfield, NM 87413

September 3, 2010

Mr. Glen Von Gonten
Hydrologist
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

RE: 2009 GROUND WATER SUMMARY REPORT

Dear Mr. Von Gonten:

Enclosed for your review is the Williams 2009 Ground Water Summary Report. The report presents monitoring data for eight sites having petroleum hydrocarbon impacted ground water resulting from past use of unlined surface impoundments. The sites included in the report are identified in separate sections.

Four of the eight sites have known or suspected up-gradient contaminant sources which continue to influence conditions affecting the rate of natural attenuation. These conditions have been previously mentioned in project correspondence and suggest producer or third party responsibility. Until such time as the other responsible parties address these sources, efforts by Williams are invariably extended.

Two sites (Florence 47X and Davis #1) have regular accumulations of LNAPL in one monitoring well at each location. Since 2002, passive collection devices have been deployed in all wells containing measurable accumulations of LNAPL. Periodic emptying of the collection devices along with active bailing of LNAPL during the quarterly sampling events continues at the aforementioned sites and at times if observed at any other site.

One site previously monitored (Patterson A COM #1A) met closure criteria in 2008 and a closure request was submitted in 2009. Williams plans to close the Patterson A COM #1A and abandon the monitoring wells there unless the NMOCD objects to that action in the next 60 days. Williams will also abandon monitoring wells at five other sites where closure requests were made based on meeting closure criteria. The closure notices for these sites were submitted on two occasions with no response from the NMOCD. Again, closure is assumed to be approved unless there is documented objection.

As noted in the site summaries, laboratory reports have not been included in the annual report. Lab results reports are retained in project files until such time as a site closure report is developed, but are available anytime upon request.

Thank you for your time to review this submittal. If you have any questions regarding the content of the report, or about specific conditions at any site, you may call me at (801) 232-8985 or Aaron Dailey at (505) 634-4708.

Respectfully,

Mark B. Harvey
Project Manager

Enclosure

Note: Report previously submitted electronically April 4, 2010

3R-315

FLORANCE # 40

Site Summary Report

Site Name: Florance 40 **Reporting Period: 2009**

Location: Unit G, Sec 21, Twn 30N, Rng 8W
Canyon: Gobernador
Operator: BP

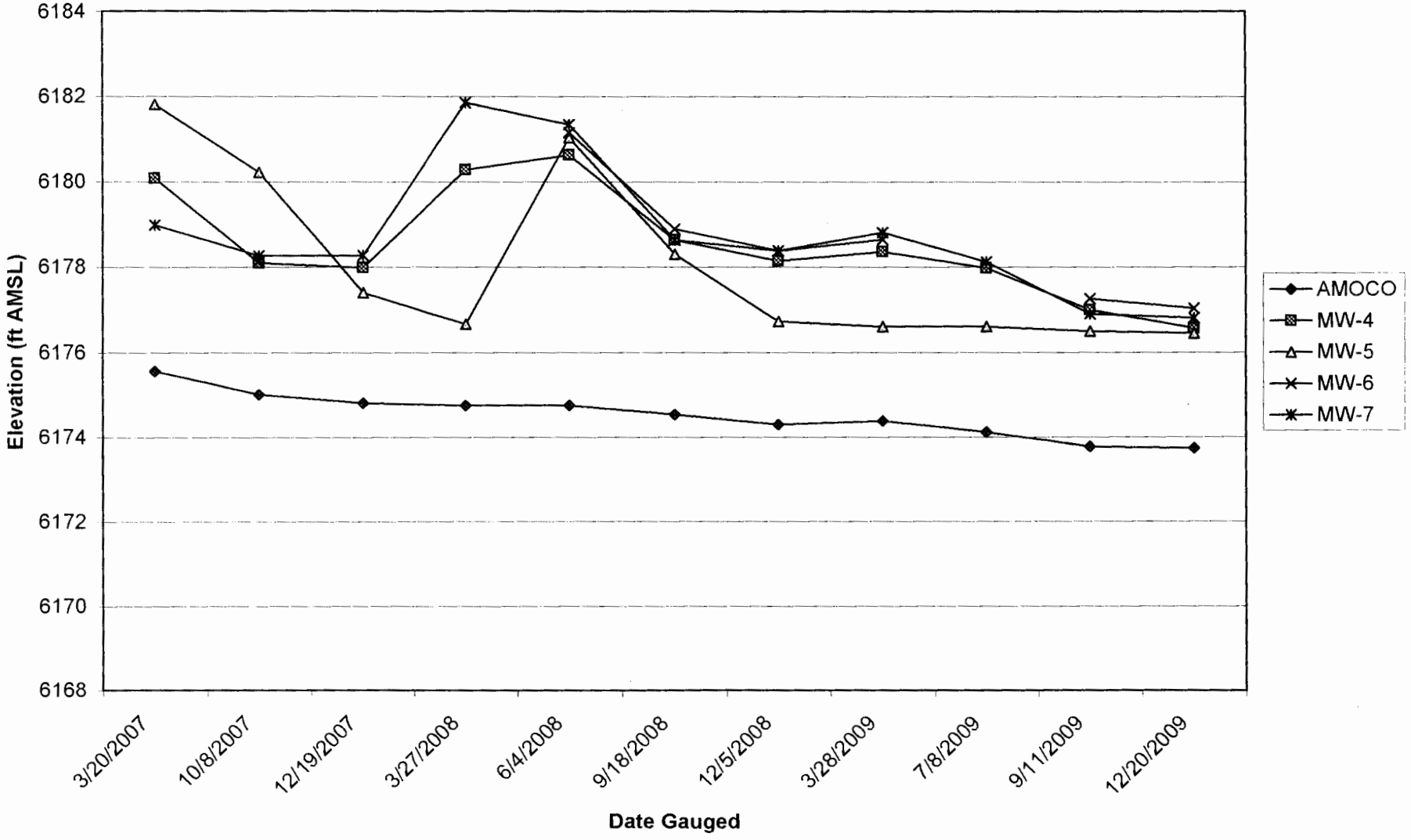
Status Narrative

Responsibility for the remediation of the contaminant plume or plumes has been divided between BP and Williams. In a December 30, 1997 letter to Amoco, the NMOCD required Amoco to address soil and ground water contamination downgradient of Amoco's separator pit, located up gradient of the Williams source area. The letter assigned responsibility for ground water contamination downgradient of PNM's former dehydrator pit to PNM (now a Williams' responsibility). During 2009, a new lock was placed on the AMOCO well and suggests that BP may now be actively monitoring its' area of responsibility. Nonetheless, the nature and extent of BP's (Amoco) efforts are unknown.

Forty-nine quarters of water quality data have been collected from the seven monitoring wells located at this site. LNAPL previously present in several wells has not observed for nearly three years. The majority of recovered LNAPL had been previously removed from well MW-1 located in the BP (Amoco) area of responsibility. Well MW-5 was not monitored during 2009, but MW-6 (source area) which previously had LNAPL, continues to show a declining contaminant trend. Sentinel well MW-7again showed no detectable BTEX during the monitoring period.

Potentiometric surface maps show ground water to flow generally to the east-southeast at an average hydraulic gradient of 0.05. Up gradient contamination likely delays effective monitored natural attenuation in the area for which Williams is responsible. Until such time as up gradient conditions are addressed, monitored natural attenuation and ultimate site closure will likely extend in time.

FLORANCE#40 2009 Hydrograph



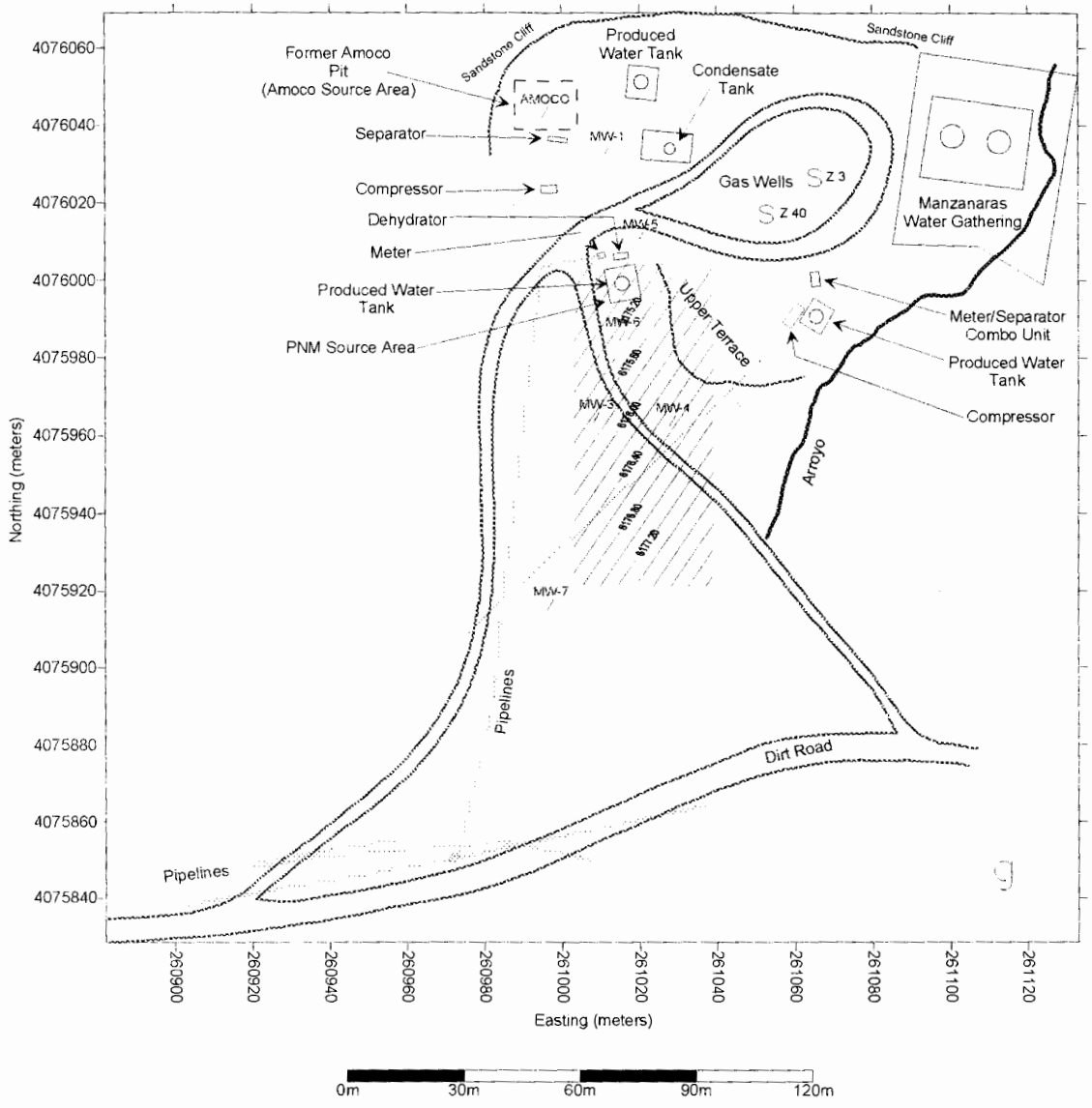


Figure 2
Potentiometric Surface Map
Florance 40
(December 2009)

LEGEND

MW-2 — Monitoring Well

5585.20 — Ground Water Elevation (ft. AMSL)

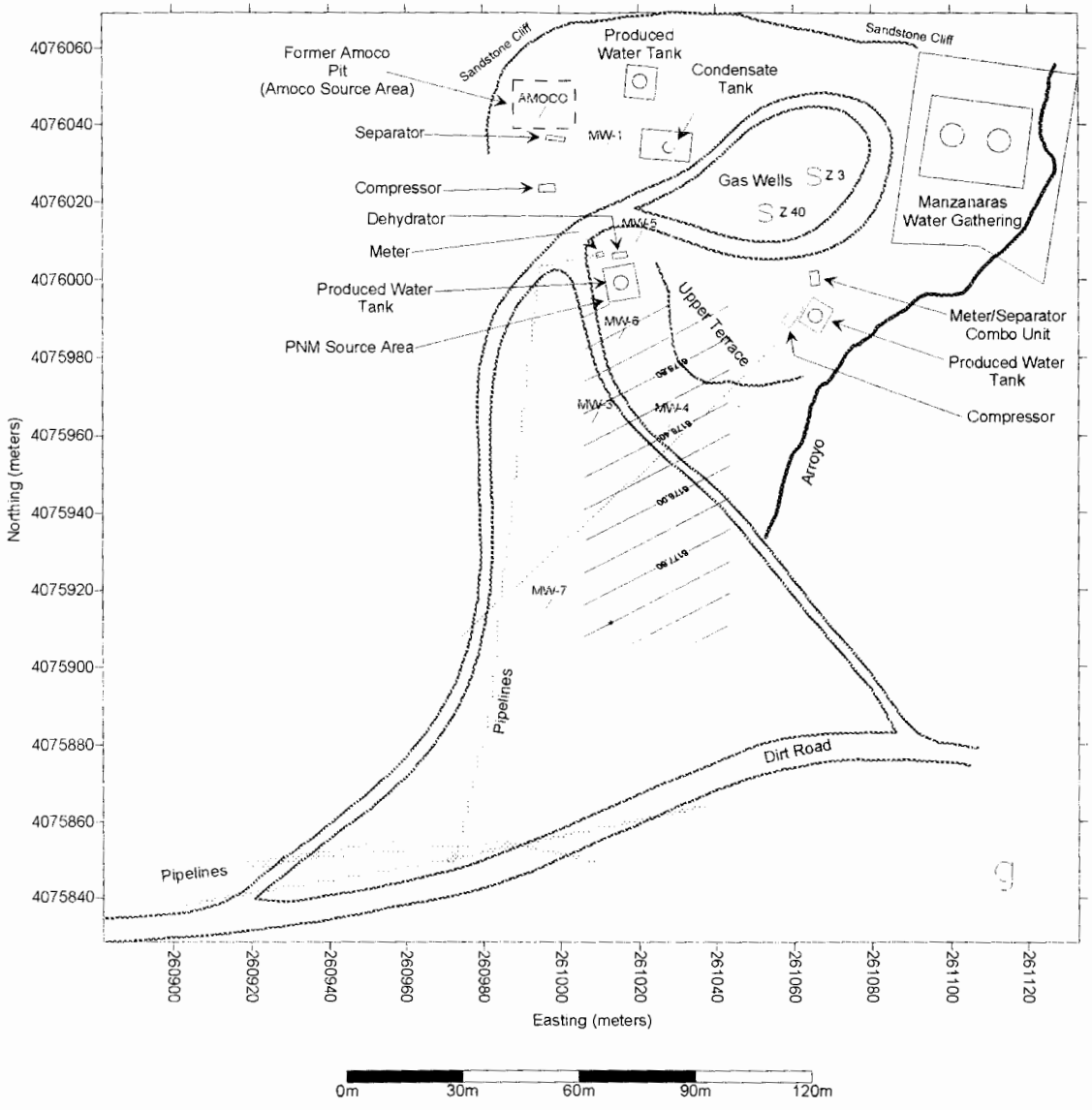


Figure 2
Potentiometric Surface Map
Florance 40
(March 2009)

LEGEND

MW-2 — Monitoring Well

5585.20 — Ground Water Elevation (ft. AMSL)

Analytical Data Summary

Site Name:
Florance 40

Reporting Period:
1/1/2008 To 12/31/2009

Well ID	Sample Date	Sample ID	Benzene ug/l	Toluene ug/l	Ethylbenzene ug/l	Xylene (Total) ug/l
AMOCO						
	3/27/2008	180127MAR08	183	<25.0	3920	11000
	3/27/2008	180427MAR08	168	<25.0	1800	10200
	6/4/2008	145404JUN08	211	<25.0	1350	8170
	9/18/2008	115119SEP08	169	<50.0	2110	17500
	12/5/2008	161705DEC08	134	<100	1280	10900
	3/28/2009	120528MAR09	130	<100	1760	15800
	7/8/2009	145208JUL09	220	<50.0	2350	16400
	9/11/2009	163411SEP09	133	<100	2880	20700
	12/20/2009	104820DEC09	106	<10.0	823	5450
MW-4						
	3/27/2008	185027MAR08	<10.0	<10.0	285	2390
	6/4/2008	151804JUN08	<10.0	<10.0	232	1830
	9/18/2008	122719SEP08	<5.0	16.1	218	1640
	12/5/2008	165005DEC08	<5.0	<5.0	55.6	410
	3/28/2009	123828MAR09	<5.0	<5.0	111	732
	7/8/2009	151708JUL09	6.1	<5.0	91.2	587
	9/11/2009	170611SEP09	<1.0	<1.0	39.9	199
	12/20/2009	111920DEC09	<1.0	<1.0	28.1	145
MW-6						
	3/27/2008	183427MAR08	3670	2150	1210	14300
	6/4/2008	154104JUN08	2380	1370	580	11900
	9/18/2008	121219SEP08	3600	278	1290	18100
	12/5/2008	163705DEC08	1580	85.3	828	10100
	3/28/2009	122528MAR09	1790	94.9	886	15300
	9/11/2009	165411SEP09	1200	94.8	523	3580
MW-7						
	3/27/2008	174427MAR08	<1.0	<1.0	<1.0	<3.0
	6/4/2008	144404JUN08	<1.0	<1.0	<1.0	<3.0
	9/18/2008	113319SEP08	<1.0	<1.0	<1.0	<3.0
	12/5/2008	160205DEC08	<1.0	<1.0	<1.0	<3.0
	3/28/2009	115028MAR09	<1.0	<1.0	<1.0	<3.0
	7/8/2009	143508JUL09	<1.0	<1.0	<1.0	<3.0
	9/11/2009	162311SEP09	<1.0	<1.0	<1.0	<3.0
	12/20/2009	101620DEC09	<1.0	<1.0	<1.0	<3.0