3R - 361

GENERAL CORRESPONDENCE

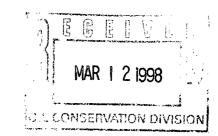
YEAR(S): 1998-1993



FIELD SERVICES

March 9, 1998

Mr. Bill Olson New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505



RE: Status of Aztec P.C. Release Site

Dear Mr. Olson:

Williams Field Services (WFS) has received the New Mexico Oil Conservation Division (OCD) letter dated February 19, 1998 regarding SOIL REMEDIATION, AZTEC PC SITE. Sampling of the site was conducted in December 1997 in the presence of Denny Foust (Aztec OCD). The sampling report prepared upon completion of the soil sampling is attached.

If you have any questions or require additional information, please call me at 801-584-6543.

Best Regards,

Ingrid Deklau

Environmental Specialist



P.O. Box 58900 Salt Lake City, UT 84158-0900 (801) 584-7033 FAX: (801) 584-6483

January 12, 1998

Mr. William C. Olson New Mexico Oil Conservation Division 2040 S. Pacheco St. Sante Fe, NM 87505

RE:ABANDONMENT OF SOIL VAPOR EXTRACTION SYSTEM AT AZTEC PC LINE DRIP

Dear Mr. Olson:

Enclosed please find the laboratory reports for analysis of soil samples from the area of the Aztec PC line drip site near the Kutz Plant located in Section 28, T28N, R10W. Williams Field Services (WFS) completed the sampling pursuant to the Oil Conservation Division (OCD) request to confirm that the soil vapor extraction (SVE) system installed by Gas Company of New Mexico (GCNM) effectively remediated hydrocarbon contaminated soil to acceptable levels. Analytical results and sample locations are provided in the attachment.

The low concentration of total petroleum hydrocarbons (TPH) in the samples is consistent with the results of the organic vapor monitoring of the last two years. The vapor monitoring results were previously submitted. A second table (attached) provides the measurements of organic vapor from the last two monitoring events.

Based on the enclosed sample analyses as well as the historically low organic vapor readings, it appears that the soils which had been impacted by the GCNM release have been effectively remediated. WFS therefore asks for OCD approval to abandon the SVE system in place and consider the site as closed; requiring no further action.

If you have any questions, please call me at 801-584-6361. Your attention to this matter is appreciated.

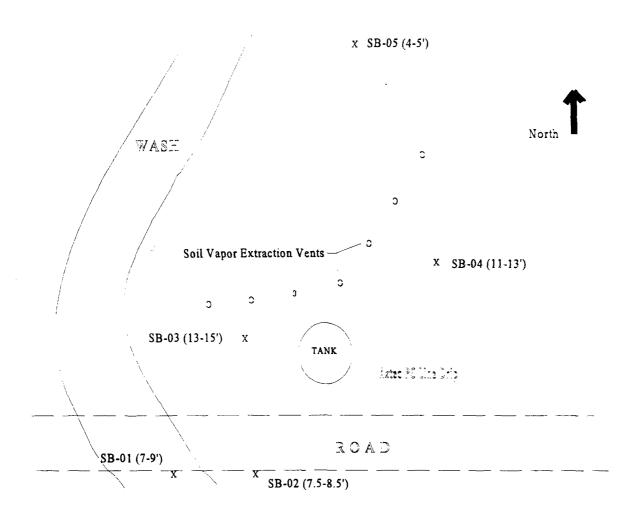
Respectfully,

Mark Harvey

Environmental Services

attachments

pc: Denny Foust - OCD/Aztec Ingrid Deklau - WFS/SLC



Not to scale. Drawing depicts relative location of sample points. Site is located approximately 1 mile east of the Kutz Plant.

SAMPLE RESULTS SUMMARY

Sample ID	Benzene	Toluene	Ethylbenzene	Xylene	TPH (mg/kg)
SB - 01 (7-9')	ND	ND	ND	ND	<2.0
SB - 02 (7.5-8.5')	ND	ND	ND	ND	5.7
SB - 03 (13-15')	ND	ND	ND	ND	7.8
SB - 04 (11-13')	ND	ND	ND	0.68	48
SB - 05 (4-5')	ND	ND	ND	ND	<2.0

Organic Vapor Monitoring - Aztec PC Line Drip

VENT#	Reading 1	Reading 2	Average(ppm)
8	0.0	0.0	0.0
7	0.0	0.0	0.0
6	0.0	0.0	0.0
5	0.0	1.0	0.5
4	0.0	0.0	0.0
3	0.0	0.0	0.0
2	0.0	0.0	0.0
1	0.0	0.0	0.0

October 17, 1997: Temperature ~ 70F. Measurements made using Thermoenvironmental 580 OVM calibrated with a benzene response factor (.51)

VENT#	Reading 1	Reading 2	Average
8	27.3	26.0	26.7
7	0.2	0.0	0.1
6	0.0	0.0	0.0
5	0.0	0.0	0.0
4	0.0	0.0	0.0
3	0.0	0.0	0.0
2	0.0	0.0	0.0
1	0.0	0.0	0.0

June 17, 1996: Temperature ~ 70F. Measurements made using Thermoenvironmental 580 OVM calibrated with a benzene response factor (.51)





Client: Williams Field Services Contact: Mark Harvey

Date Analyzed: December 23, 1997

AMERICAN WEST ANALYTICAL

LABORATORIES

Analysis Requested: Volatile Aromatics Total Petroleum Hydrocarbons

Method Ref. Number: SW-846 #8020/8015 modified (Extraction - Sequential GC/PID/FID)

Lab Sample ID: L31854-Method Blank

	Analytical Results		BTX/TPH-E
463 West 3600 South Salt Lake City, Utah 84115	Compound:	Reporting <u>Limit:</u>	Amount Detected:
	Benzene	0.10	<0.10
(801) 263-8686 Foll Free (888) 263-8686	Toluene	0.10	<0.10
	Ethylbenzene	0.10	<0.10
Fax (801) 263-8687	Units = ppm South Utah 84115 Benzene Toluene 3-8686 Ethylbenzene 3-8686 Total Xylene Ompound: L A Benzene O Toluene O Toluene O Total Xylene	0.10	<0.10
	Total Petroleum Hydrocarbons	2.0	<2.0

Car Car Car

Report Date: December 29, 1997





Client: Williams Field Services Date Sampled: December 20, 1997 Date Received: December 22, 1997

AMERICAN WEST ANALYTICAL LABORATORIES

463 West 3600 South Salt Lake City, Utah

84115

(801) 263-8686

Toll Free (888) 263-8686 Fax (801) 263-8687 Analysis Requested: Volatile Aromatics

Total Petroleum Hydrocarbons

Field Sample ID:

AZTEC PC-LD-TAA KTZ-SB-01 (7-9')

Lab Sample ID: L31854-1

Contact: Mark Harvey

Method Ref. Number:

Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

(Extraction-Sequential GC/PID-FID)

SW-846 #8020/8015 modified

Analytical Results

Units = mg/kg(ppm)

	Damantina	Par parket
Compound:	Reporting <u>Limit:</u>	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	< 0.10
Total Petroleum Hydrocarbons	2.0	< 2.0

% Moisture

14.%

BTX/TPH-E

All compounds are reported on a dry weight basis.

Report Date: December 29, 1997



ORGANIC ANALYSIS REPORT

Client: Williams Field Services Date Sampled: December 20, 1997 Date Received: December 22, 1997

AMERICAN WEST ANALYTICAL LABORATORIES Analysis Requested: Volatile Aromatics Total Petroleum Hydrocarbons

Field Sample ID: AZTEC PC-LD-TAA KTZ-SB-02 (7-8')

Contact: Mark Harvey Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref. Number: SW-846 #8020/8015 modified

(Extraction-Sequential GC/PID-FID)

Lab Sample ID: L31854-2

	Analytical Results		BTX/TPH-E
463 West 3600 South Salt Lake City, Utah 84115	Units = mg/kg(ppm) Compound:	Reporting <u>Limit:</u>	Amount Detected:
	Benzene	0.10	< 0.10
	Toluene	0.10	< 0.10
(801) 263-8686	Ethylbenzene	0.10	< 0.10
Toll Free (888) 263-8686 Fax (801) 263-8687	Total Xylene	0.10	< 0.10
	Total Petroleum Hydrocarbons	2.0	5.7

% Moisture 12.%

All compounds are reported on a dry weight basis.

Report Date: December 29, 1997



ORGANIC ANALYSIS REPORT

Client: Williams Field Services Date Sampled: December 20, 1997

Date Received: December 22, 1997

AMERICAN WEST ANALYTICAL **LABORATORIES**

Analysis Requested: Volatile Aromatics Total Petroleum Hydrocarbons

Field Sample ID: AZTEC PC-LD-TAA KTZ-SB-03 (13-15')

Contact: Mark Harvey

Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref.Number: SW-846 #8020/8015 modified

(Extraction-Sequential GC/PID-FID)

Lab Sample ID: L31854-3

	Analytical Results		BTX/TPH-E
463 West 3600 South Salt Lake City, Utah 84115	Units = mg/kg(ppm) Compound:	Reporting <u>Limit:</u>	Amount Detected:
	Benzene	0.10	< 0.10
	Toluene	0.10	< 0.10
(801) 263-8686 Toll Free (888) 263-8686	Ethylbenzene Total Xylene	0.10 0.10	< 0.10 < 0.10
Fax (801) 263-8687	Total Petroleum Hydrocarbons	2.0	7.8

% Moisture 10.%

All compounds are reported on a dry weight basis.

Report Date: December 29, 1997



LABORATORIES

ORGANIC ANALYSIS REPORT

Client: Williams Field Services Date Sampled: December 20, 1997

Date Received: December 22, 1997

Analysis Requested: **AMERICAN** WEST ANALYTICAL

Volatile Aromatics Total Petroleum Hydrocarbons

Field Sample ID: AZTEC PC-LD-TAA

KTZ-SB-04 (11-13')

Contact: Mark Harvey

Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref. Number:

SW-846 #8020/8015 modified

(Extraction-Sequential GC/PID-FID)

Lab Sample ID: L31854-4

2.0

Analytical Results	
Units = $mg/kg(ppm)$	

Total Petroleum Hydrocarbons

463 West 3600 South Reporting Salt Lake City, Utah Compound: Limit: Detected: 84115 Benzene 0.10 < 0.10 Toluene 0.10 < 0.10 Ethylbenzene 0.10 < 0.10 (801) 263-8686 Toll Free (888) 263-8686 Total Xylene 0.10 0.68 Fax (801) 263-8687

> % Moisture 13.%

All compounds are reported on a dry weight basis.

Report Date: December 29, 1997

48.



ORGANIC ANALYSIS REPORT

Client: Williams Field Services Date Sampled: December 20, 1997

Date Received: December 22, 1997

AMERICAN WEST ANALYTICAL LABORATORIES Analysis Requested: Volatile Aromatics Total Petroleum Hydrocarbons

Field Sample ID: AZTEC PC-LD-TAA KTZ-SB-05 (4.5-5.5')

Contact: Mark Harvey

Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref. Number: SW-846 #8020/8015 modified (Extraction-Sequential GC/PID-FID)

Lab Sample ID: L31854-5

	Analytical Results		BTX/TPH-E
463 West 3600 South Salt Lake City, Utah 84115	Units = mg/kg(ppm) Compound:	Reporting Limit:	Amount Detected:
	Benzene	0.10	< 0.10
	Toluene	0.10	< 0.10
(801) 263-8686	Ethylbenzene	0.10	< 0.10
Toll Free (888) 263-8686 Fax (801) 263-8687	Total Xylene	0.10	< 0.10
	Total Petroleum Hydrocarbons	2.0	< 2.0

% Moisture 8.0%

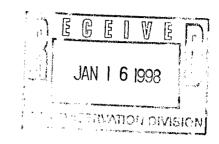
All compounds are reported on a dry weight basis.

Report Date: December 29, 1997



P.O. Box 58900 Salt Lake City, UT 84158-0900 (801) 584-7033 FAX: (801) 584-6483

January 12, 1998



Mr. William C. Olson New Mexico Oil Conservation Division 2040 S. Pacheco St. Sante Fe, NM 87505

RE:ABANDONMENT OF SOIL VAPOR EXTRACTION SYSTEM AT AZTEC PC LINE DRIP

Dear Mr. Olson:

Enclosed please find the laboratory reports for analysis of soil samples from the area of the Aztec PC line drip site near the Kutz Plant located in Section 28, T28N, R10W. Williams Field Services (WFS) completed the sampling pursuant to the Oil Conservation Division (OCD) request to confirm that the soil vapor extraction (SVE) system installed by Gas Company of New Mexico (GCNM) effectively remediated hydrocarbon contaminated soil to acceptable levels. Analytical results and sample locations are provided in the attachment.

The low concentration of total petroleum hydrocarbons (TPH) in the samples is consistent with the results of the organic vapor monitoring of the last two years. The vapor monitoring results were previously submitted. A second table (attached) provides the measurements of organic vapor from the last two monitoring events.

Based on the enclosed sample analyses as well as the historically low organic vapor readings, it appears that the soils which had been impacted by the GCNM release have been effectively remediated. WFS therefore asks for OCD approval to abandon the SVE system in place and consider the site as closed; requiring no further action.

If you have any questions, please call me at 801-584-6361. Your attention to this matter is appreciated.

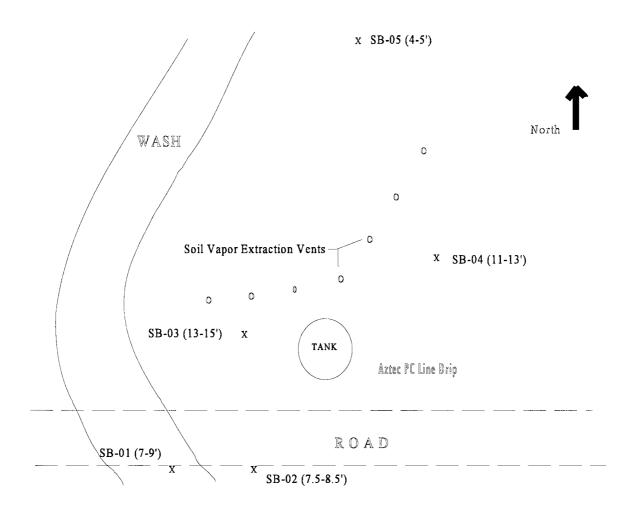
Respectfully,

Mark Harvey

Environmental Services

attachments

pc: Denny Foust - OCD/Aztec Ingrid Deklau - WFS/SLC



Not to scale. Drawing depicts relative location of sample points. Site is located approximately 1 mile east of the Kutz Plant.

SAMPLE RESULTS SUMMARY

Sample ID	Benzene	Toluene	Ethylbenzene	Xylene	TPH (mg/kg)
SB - 01 (7-9')	ND	ND	ND	ND	<2.0
SB - 02 (7.5-8.5')	ND	ND	ND	ND	5.7
SB - 03 (13-15')	ND	ND	ND	ND	7.8
SB - 04 (11-13')	ND	ND	ND	0.68	48
SB - 05 (4-5')	ND	ND	ND	ND	<2.0

Organic Vapor Monitoring - Aztec PC Line Drip

VENT#	Reading 1	Reading 2	Average(ppm
8	0.0	0.0	0.0
7	0.0	0.0	0.0
6	0.0	0.0	0.0
5	0.0	1.0	0.5
4	0.0	0.0	0.0
3	0.0	0.0	0.0
2	0.0	0.0	0.0
1	0.0	0.0	0.0

October 17, 1997: Temperature ~ 70F. Measurements made using Thermoenvironmental 580 OVM calibrated with a benzene response factor (.51)

VENT#	Reading 1	Reading 2	Average
8	27.3	26.0	26.7
7 .	0.2	0.0	0.1
6	0.0	0.0	0.0
5	0.0	0.0	0.0
4	0.0	0.0	0.0
3	0.0	0.0	0.0
2	0.0	0.0	0.0
1	0.0	0.0	0.0

June 17, 1996: Temperature ~ 70F. Measurements made using Thermoenvironmental 580 OVM calibrated with a benzene response factor (.51)





Client: Williams Field Services Contact: Mark Harvey

Date Analyzed: December 23, 1997

AMERICAN WEST ANALYTICAL **LABORATORIES** Analysis Requested: Volatile Aromatics Total Petroleum Hydrocarbons

Method Ref.Number: SW-846 #8020/8015 modified (Extraction - Sequential GC/PID/FID)

Lab Sample ID: L31854-Method Blank

	Analytical Results Units = ppm	BTX/TPH-E	
463 West 3600 South Salt Lake City, Utah 84115	Compound:	Reporting Limit:	Amount Detected:
	Benzene	0.10	< 0.10
	Toluene	0.10	< 0.10
	Ethylbenzene	0.10	< 0.10
Benzene Toluene	0.10	< 0.10	
	Total Petroleum Hydrocarbons	2.0	<2.0

Report Date: December 29, 1997

ORGANIC ANALYSIS REPORT



AMERICAN

ANALYTICAL LABORATORIES

WEST

Client: Williams Field Services

Date Sampled: December 20, 1997 Date Received: December 22, 1997

Analysis Requested: Volatile Aromatics

Total Petroleum Hydrocarbons

Field Sample ID:

AZTEC PC-LD-TAA

KTZ-SB-01 (7-9')

% Moisture

Contact: Mark Harvey Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref. Number:

SW-846 #8020/8015 modified

(Extraction-Sequential GC/PID-FID)

Lab Sample ID: L31854-1

	Analytical Results Units = mg/kg(ppm)		ВТХ/ТРН-Е
463 West 3600 South Salt Lake City, Utah 84115	Compound:	Reporting <u>Limit:</u>	Amount Detected:
	Benzene	0.10	< 0.10
	Toluene	0.10	< 0.10
(801) 263-8686	Ethylbenzene	0.10	< 0.10
Toll Free (888) 263-8686 Fax (801) 263-8687	Total Xylene	0.10	< 0.10
,	Total Petroleum Hydrocarbons	2.0	< 2.0

All compounds are reported on a dry weight basis.

Report Date: December 29, 1997

1 of 1

14.%



ANALYTICAL LABORATORIES

ORGANIC ANALYSIS REPORT

Client: Williams Field Services Date Sampled: December 20, 1997

Date Received: December 22, 1997

Analysis Requested: **AMERICAN** Volatile Aromatics **WEST**

Total Petroleum Hydrocarbons

Field Sample ID:

AZTEC PC-LD-TAA KTZ-SB-02 (7-8')

Contact: Mark Harvey

Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref. Number:

SW-846 #8020/8015 modified

(Extraction-Sequential GC/PID-FID)

< 0.10

< 0.10

Lab Sample ID: L31854-2

0.10

0.10

	Analytical Results		BTX/TPH-E
163 West 3600 South	Units = $mg/kg(ppm)$		
Salt Lake City, Utah 84115	Compound:	Reporting <u>Limit:</u>	Amount Detected:
	Benzene	0.10	< 0.10

Ethylbenzene (801) 263-8686 Toll Free (888) 263-8686 Total Xylene Fax (801) 263-8687

Toluene

0.10 < 0.10

Total Petroleum Hydrocarbons 2.0 5.7

% Moisture 12.%

All compounds are reported on a dry weight basis.

Report Date: December 29, 1997



ORGANIC ANALYSIS REPORT

Client: Williams Field Services Date Sampled: December 20, 1997 Date Received: December 22, 1997

AMERICAN WEST ANALYTICAL

LABORATORIES

Analysis Requested: Volatile Aromatics

Total Petroleum Hydrocarbons

Field Sample ID: AZTEC PC-LD-TAA KTZ-SB-03 (13-15')

Contact: Mark Harvey Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref. Number:

SW-846 #8020/8015 modified

(Extraction-Sequential GC/PID-FID)

Lab Sample ID: L31854-3

2.0

	Analytical Results		BTX/TPH-E
463 West 3600 South Salt Lake City, Utah 84115	Units = mg/kg(ppm) Compound: Benzene	Reporting <u>Limit:</u> 0.10	Amount Detected: < 0.10
	Toluene	0.10	< 0.10
(801) 263-8686	Ethylbenzene	0.10	< 0.10
Toll Free (888) 263-8686 Fax (801) 263-8687	Total Xylene	0.10	< 0.10

% Moisture	10.%
/6 1V101Stu1C	10.70

All compounds are reported on a dry weight basis.

Total Petroleum Hydrocarbons

Report Date: December 29, 1997

1 of 1

7.8





Client: Williams Field Services Date Sampled: December 20, 1997 Date Received: December 22, 1997

AMERICAN WEST **ANALYTICAL LABORATORIES**

Analysis Requested: Volatile Aromatics Total Petroleum Hydrocarbons

Field Sample ID: AZTEC PC-LD-TAA KTZ-SB-04 (11-13')

Analytical Results

Units = mg/kg(ppm)

Contact: Mark Harvey

Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref. Number:

SW-846 #8020/80T5 modified

(Extraction-Sequential GC/PID-FID)

Lab Sample ID: L31854-4

BTX/TPH-E

463 West 3600 South
Salt Lake City Utah

84115

(801) 263-8686

Toll Free (888) 263-8686 Fax (801) 263-8687

Compound:	Reporting <u>Limit:</u>	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	0.68
Total Petroleum Hydrocarbons	2.0	48.

% Moisture

13.%

All compounds are reported on a dry weight basis.

Report Date: December 29, 1997





Client: Williams Field Services Date Sampled: December 20, 1997 Date Received: December 22, 1997

AMERICAN WEST **ANALYTICAL LABORATORIES** Analysis Requested: Volatile Aromatics Total Petroleum Hydrocarbons

Field Sample ID: AZTEC PC-LD-TAA KTZ-SB-05 (4.5-5.5')

Contact: Mark Harvey

Date Extracted: December 23, 1997 Date Analyzed: December 24, 1997

Method Ref. Number:

SW-846 #8020/8015 modified

(Extraction-Sequential GC/PID-FID)

BTX/TPH-E

Lab Sample ID: L31854-5

Analytical Results Units = mg/kg(ppm)

463 West 3600 South Salt Lake City, Utah

84115

(801) 263-8686

Toll Free (888) 263-8686 Fax (801) 263-8687

Compound:	Reporting <u>Limit:</u>	Amount Detected:
Benzene	0.10	< 0.10
Toluene	0.10	< 0.10
Ethylbenzene	0.10	< 0.10
Total Xylene	0.10	< 0.10
Total Petroleum Hydrocarbons	2.0	< 2.0

% Moisture	9 00
% Moisture	8.0%

All compounds are reported on a dry weight basis.

Report Date: December 29, 1997



FIELD SERVICES

October 29, 1997

Mr. Bill Olson New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

NOV - 3 1997

RE: Status of Aztec P.C. Release Site

Dear Mr. Olson:

GCNM discovered a leak in the Aztec P.C. line in March 1993. Soil remediation conducted by GCNM included removing 6000+ tons of hydrocarbon contaminated soil to an off-site treatment and disposal facility, and installation of a passive soil gas extraction system to remediate any residual contamination. At that time, NMOCD approved a plan that required quarterly monitoring of the passive soil gas vapor extraction system, and annual reporting to NMOCD of the monitoring results. The GCNM assets were purchased by Williams Field Services (WFS) late in 1995. Since then, WFS has been responsible for the remediation program at the Aztec P.C. site.

Results from each of the monitoring events are included in the table below. The most recent monitoring event occurred on October 17, 1997. Based on results from this event, as well as the historical data, it appears that the soil vent system has reduced soil vapors to much less than any known vapor standard for the contaminants of concern.

	May	' 94	Sept '	94	Dec	' 94	Feb '9	95	Apr	' 95	J	an '96	*	Jun '9	6*	Oct	'97 *
Vent	R1	R2	R1	R2	R1	R2	R1	R2	R1	R2	R1	R2	R3	R1	R2	R1	R2
1	?	?	1.5	1.6	0	0	0.1	0	0	NR	0	0	0	0	0	0	0
2	0	0	0	0	0	0	0	0	0	NR	0	0	0	0	0	0	0
3	0	0	0	0	0	0	0	0	0	NR	0	0	0	0	0	0	0
4	2	3	0.1	0.2	4	4.5	0	0	0	NR	0	0	0	0	0	0	0
5	16	19	0	0	15	18	14	11.8	0	NR	0	0	0	0	0	0	1
6	25	30	17.5	19.2	28	30	20.2	22.9	0	NR	0.6	1.9	1.6	0	0	0	0
7	24	30	34	35.5	22	27	60.1	78.2	0	NR	0	0	0	0.2	0	0	0
8	0	0	0	0	0	0	55.5	32.6	86	NR	0	8.7	10	27.3	26	0	0

Notes: R1 = Reading 1, R2 = Reading 2, NR = No reading taken, * = WFS data OVM calibrated with a benzene response factor.

WFS therefore proposes to discontinue the monitoring and confirm that clean-up standards have been met by taking soil samples across the lateral and vertical extent of the affected area. The number and location of soil samples to be taken will be determined based on the Site Reclamation Report prepared by Envirotech in 1993. Samples that equal or exceed a reading of 100 ppm on a PID will be analyzed for BTEX and TPH. Samples that fall below a reading of 100 ppm on the PID will be analyzed, at a minimum, for TPH. WFS will notify you at least 48 hours in advance of the sampling event, and will forward copies of the analytical results to your office.

If the analytical results are below the NMOCD cleanup standards, WFS proposes to abandon the soil vapor extraction system. This may be accomplished by cutting off the pipes at the ground surface and filling the pipe remaining in place with an expandable cement, or some similar means that would prohibit the pipe from acting as a conduit to the subsurface.

If you have any questions or require additional information, please call me at 801-584-6543.

Best Regards,

Ingrid Deklau

Environmental Specialist

xc: Denny Foust, Aztec OCD

Tom O'Keefe, WFS SJA Operations



P.O. Box 58900 Salt Lake City, UT 84158-0900 (801) 584-7033 FAX: (801) 584-6483

PECEIVED

JAN 2 9 1996

Environmental Bureau
Oil Conservation Division

January 25, 1996

Mr. Bill Olson New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87504

Dear Mr. Olson:

Enclosed, please find the annual monitoring report for the passive soil vapor extraction system on the Aztec P.C. drip line release. If you have any questions please contact me at (801) 584-6543.

Sincerely,

Leigh E. Gooding

Sr. Environmental Specialist

CCH Denny Foust, NMOCD Azzec Office

MONITORING RESULTS FOR THE AZTEC P.C. DRIPLINE RELEASE

(All Readings reported by Denver Bearden of PNM)

FEBRUARY 1, 1995 10:00 AM

VENT #	READING 1	READING 2
8	55.5	32.6
7	60.1	78.2
6	20.2	22.9
5	14.0	11.8
4	0	0
3	0	0
2	0	0
1	0.1	0

APRIL 13, 1995 8:42 AM

VENT #	READING 1	READING 2
8	86	None
7	0	None
6	0	None
5	0	None
4	0	None
3	0	None
2	0	None
1	0	None



MEMORANDUM

Date:

October 4, 1995

File No.:

To:

Leigh Gooding

From:

Mark Harvey

Company:

WFS

Company:

WFS

Dept.:

Environmental

Dept.:

Environmental

Mail Stop:

Mail Stop:

2G1

2G1

Phone:

6361

SUBJECT:

VAPOR MONITORING AT THE AZTEC PC DRIP RELEASE

On Thursday, September 28th, I traveled to the Aztec PC site behind the Kutz Plant to conduct quarterly vapor monitoring of the soil vents. The vents were installed by GCNM as agreed to by NMOCD for the purpose of enhancing contaminant (TPH) degradation.

Below is a table summarizing the sampling event.

VENT#	Reading 1	Reading 2	Reading 3
8	5.6	0.4	13.6
7	0.0	0.0	0.0
6	1.6	15.2	8.8
5	0.0	0.0	2.7
4	2.5	0.0	0.0
3	0.0	0.0	0.0
2	0.0	0.0	0.0
1	0.0	0.0	0.0

All values in parts per million (ppm)

Note: Wind velocity increased during 2nd sampling. Turbines rotating during second reading.

Vapor monitoring was conducted using a Thermoenvironmental OVM Model 580S calibrated with a benzene response factor.

For your information, I have provided a rough sketch of the area.

If you have any questions, or need additional information, please contact me.

TO KUTZ PLANT GRAVEL ROAD ARROTO Condensate



MEMORANDUM

Date:

January 18, 1996

File No.:

To:

Leigh Gooding

From:

Mark Harvey

Company:

WFS

Company:

WFS

Dept.:

Dept.:

Environmental

Mail Stop:

Environmental 2G1

Mail Stop:

2G1

Phone:

6361

SUBJECT:

VAPOR MONITORING AT THE AZTEC PC DRIP RELEASE

On Tuesday, January 16th, I traveled to the Aztec PC site behind the Kutz Plant to conduct quarterly vapor monitoring of the soil vents. The vents were installed by GCNM as agreed to by NMOCD for the purpose of enhancing contaminant (TPH) degradation.

Below is a table summarizing the sampling event.

VENT#	Reading 1	Reading 2	Reading 3
8	0.0	8.7	10.0
7	0.0	0.0	0.0
6	0.6	1.9	1.6
5	0.0	0.0	0.0
4	0.0	0.0	0.0
3	0.0	0.0	0.0
2	0.0	0.0	0.0
1	0.0	0.0	0.0

All values in parts per million (ppm)

Note: Winds were light and variable. Temperature approximately 53° F.

Vapor monitoring was conducted using a Thermoenvironmental OVM Model 580S calibrated with a benzene response factor.

If you have any questions, or need additional information, please contact me.

GAS COMPANY OF NEW MEXICO

February 09, 1995

OIL CONSERVE ON BIVISION SECTIVED 13 FER 13 FIN 8 52

Mr. Bill Olson New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87504

Bearly)

Dear Bill,

This is the annual report on monitoring results for the passive soil vapor extration system on the Aztec P.C. drip line release.

Attached is the monitoring results. If you have any questions, please call me at 505-632-4131.

Sincerely,

Denver Bearden Administrator III

DB:kb Enclosure

CC: Denny Foust - Aztec OCD Bill Leise - Farmington BLM Toni Ristau -

Monitoring Results for the Aztec P.C. Dripline Release

Date of Monitoring	Time	Results PPM
May 10, 1994	11:35 AM	Vent 1 west 1st 2nd 2 0 0 3 0 0 4 2 3 5 16 19 6 25 30 7 24 30
September 01, 1994	09:15 AM	8 0 0 1 1.5 1.6 2 0 0 3 0 0 4 0.1 0.2 5 0 0 6 17.5 19.2 7 34.0 35.5
December 09, 1994	09:30 AM	8 0 0 1 0 0 2 0 0 3 0 0 4 4 4.5 5 15 18 6 28 30 7 22 27
February 01, 1995	10:00 AM	8 0 0 1 0.1 0.0 2 0 0 3 0 0 4 0 0 5 14.0 11.8 6 20.2 22.9 7 60.1 78.2 8 55.5 32.6

*94 FE * 25 AM 8 39

February 22, 1994

Mr. William C. Olson New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, NM 87504-2088

Dear Mr. Olson:

The Monitoring Program for the Passive Soil Vapor Extraction (SVE) System on the Aztec P.C. Drip Line release will be:

- 1. Four times a year (quarterly), each of the eight pipes used in the SVE system will be tested using a Photoionization Detector (PID), Organic Vapor Meter (OVM).
- 2. We will select the days of testing (Windy or Calm).
- 3. A yearly report will be sent to OCD, Santa Fe; OCD, Aztec; and the BLM, Farmington.

Enclosed is the results of the monitoring conducted in February 1994.

If you have any questions, please call me at 632-4131.

musead.

Denver Bearden

Administrator III

DB:rt Enclosure

cc: Denny Foust Michael Pool Toni Ristau

TESTING RESULTS FOR THE AZTEC P.C. DRIP LINE RELEASE

Date of Testing--February 10, 1994

Equipment Used--Photoionization Detector (PID), Organic Vapor Meter (OVM)

Time of Testing--3 p.m.

Wind--3 -10 mph, gusting

Temperature--45 degrees fahrenheit

1/4" vent holes were drilled in each pipe for testing--each vent hole is approximately 1' from the ground

Each vent was read for two minutes

Vent 1-- 7.0 ppm

Vent 2--12.0 ppm

Vent 3-- 4.7 ppm

Vent 4 -- 3.4 ppm

Vent 5--28.8 ppm

Vent 6--26.1 ppm

Vent 7--46.0 ppm

Vent 8--61.8 ppm

Public Service Company of New Mexico

THE CONSERVE ON DIVISION RECEIVED

193 SEP 21 AM 9 57

September 16, 1993

Mr. Bill Olsen New Mexico Oil Conservation Division Post Office Box 2088 Santa Fe, N.M. 87503

Dear Mr. Olsen,

In March of 1993, GCNM noticed hydrocarbon liquids next to a pipeline drip in one of our gathering systems. The specific system is called the Aztec Picture Cliffs (PC) gathering system. The OCD and BLM were subsequently notified. An initial site assessment that was performed by Envirotech, Inc. indicated a substantial amount of subsurface contamination. Due to the extent of the contamination the OCD required that a "dig and haul" method of remediation be utilized.

Envirotech was then retained to remediate the location. They performed the work as described in the attached document. The document describes the work performed, provides a description of the site and a gives a brief history. The project is discussed to a greater extent detailing the initial excavation, final excavation, and the exploratory drilling that was performed. The report then describes the Soil Vapor Extraction (SVE) system installed to halt the migration of hydrocarbons further downstream in the arroyo.

Sincerely,

Erick Seelinger

Environmental Engineer

cc:

Mr. Denny Foust Deputy Oil & Gas Inspector N.M. Oil Conservation Division 1000 Rio Brazos Road

Aztec, New Mexico 87410

Elysse Gold Bureau of Land Management Farmington District Office 1235 La Plata Highway Farmington, New Mexico 87401

Toni Ristau, PNM

BILL OLSON

ENVIROTECH® INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION
UNSERVED AND DIVISION

5796 U.S. HIGHWAY 64 - 3014

REC: VED

FARMINGTON, NEW MEXICO 87401

PHONE: (505) 632-0615

5) 632-0615 '93 JU 27 AM 9 30

Mr. Denny Foust

July 19, 1993

Oil & Gas Inspector

New Mexico Oil Conservation Division

Aztec, New Mexico 87410

RE: Aztec PC Mainline Drip Cleanup

Project: 93124

Proposed Reclamation

Dear Mr. Foust:

On behalf of the Gas Company of New Mexico (GCNM), Envirotech is submitting the following proposal to install a soil vapor extraction (SVE) system for reclamation of the referenced Picture Cliffs (PC) pipeline spill incident located in Unit C, Sec 28, T28N, R10W, NMPM, San Juan County, New Mexico.

Brief History:

In March of 1993 a spill incident was reported along a product transmission line near a drip trap located adjacent to a wash. Subsequent to the spill, the GCNM retained Envirotech to abate hydrocarbon contaminated soils in the area of the spill. Initial abatement consisted of excavation of hydrocarbon contaminated soils above the current New Mexico Oil Conservation Division's (NMOCD) regulations. To date a total of over 6200 cubic yards of soil have been excavated. The abatement effort was monitored by field screening and/or laboratory testing of soils sampling for volatile hydrocarbons and total recoverable petroleum hydrocarbons (TPH).

Due to the unforseen extent of contamination, the abatement effort was halted to reevaluate the situation and limited drilling was conducted to define the total extent of soil contamination (Refer to the attached correspondence summarizing the drilling, dated June 16, 1993). Based on the findings from drilling and excavation, residual soil contamination remains south of the transmission line under the oilfield access road. A relatively minor amount of contamination remains along the north side of the transmission line where the majority of the excavation effort was completed (Refer to the attached site diagram).

Proposed Remediation:

Excavation of the remaining soil appears to be impractical, due to the location of the transmission line and roadway. Therefore, it is proposed to install a soil vapor extraction system (SVE) to abate the remaining soil contamination.

MKL/mkl FILE: 31240CD.PRP

The SVE would be installed adjacent to and north-west (down-gradient) of the transmission line. Installation would consist of;

- 1) Backfill of excavation and recontour to original ground surface.
- 2) Construction of a porous <3" gravel filter intercept gallery with a vapor barrier along the top and downgradient portions. Slotted piping will be plumbed through the intercept gallery for vapor extraction.
- 3) Wind turbines will be placed on the effluent portion of the piping to complete the passive SVE system. When operating, the turbines create a slight vacuum to enhance extraction of volatile hydrocarbon vapors from the subsurface.

The attached drawings outline the proposed SVE system.

Once installed, the effluent emissions from the SVE system would be measured utilizing an organic vapor meter (OVM). Monitoring is proposed to be on a biannual basis, with results submitted to the NMOCD by the GCNM on an annual basis.

Verification of the abatement of remaining soil contamination will be conducted by resampling in the areas presently known to have residual contamination. This resampling will be conducted by the GCNM upon permanent abandonment of the transmission line or sooner if emissions from the SVE system indicate possible completion.

Summary:

Given no future spills, the abatement effort to date, estimated extent of remaining contamination, and the proposed SVE system; it is believed this abatement of the subject spill can satisfy the New Mexico Oil Conservation Division (NMOCD) and Bureau of Land Management (BLM) requirements for the following reasons:

- 1) The source of contamination has been identified and the piping leak repaired.
- 2) A majority of the soil contamination both down-gradient and vertically from the source has been removed.
- 3) The intercept gallery with vapor barriers would be located down-gradient from the remaining contamination to minimize future migration down the wash toward the San Juan River. The highly porous gravel filter pack should capture and contain residual hydrocarbon vapors as they migrate from the in-situ soils.

NMOCD: Aztec PC Drip Remediation ENVIROTECH INC.

July 14, 1993 Project No: 93124

4) In-situ soil venting is a technique recognized as a successful method for the removal and abatement of volatile hydrocarbon contamination in the soil vadose (unsaturated) zone.

Due to the extent of contamination and unknown quantity of contaminate, non-homogeneous and tight nature of the subsurface soils, and untested efficiency of the passive SVE system, the length of time to complete the abatement of the remaining soil contamination can not be accurately estimated but is anticipated to require a year or more. Once the SVE system is in operation a better estimate of soil abatement may be determined.

Please contact Envirotech if the proposed remediation is acceptable to the NMOCD. If you have any questions, please contact us at (505) 632-0615. Thank you for your assistance with this project.

Respectfully submitted,

ENVIROTECH INC.

Michael K. Lane, P.E. Geological Engineer

CC: Erick Seelinger

Gas Company of New Mexico

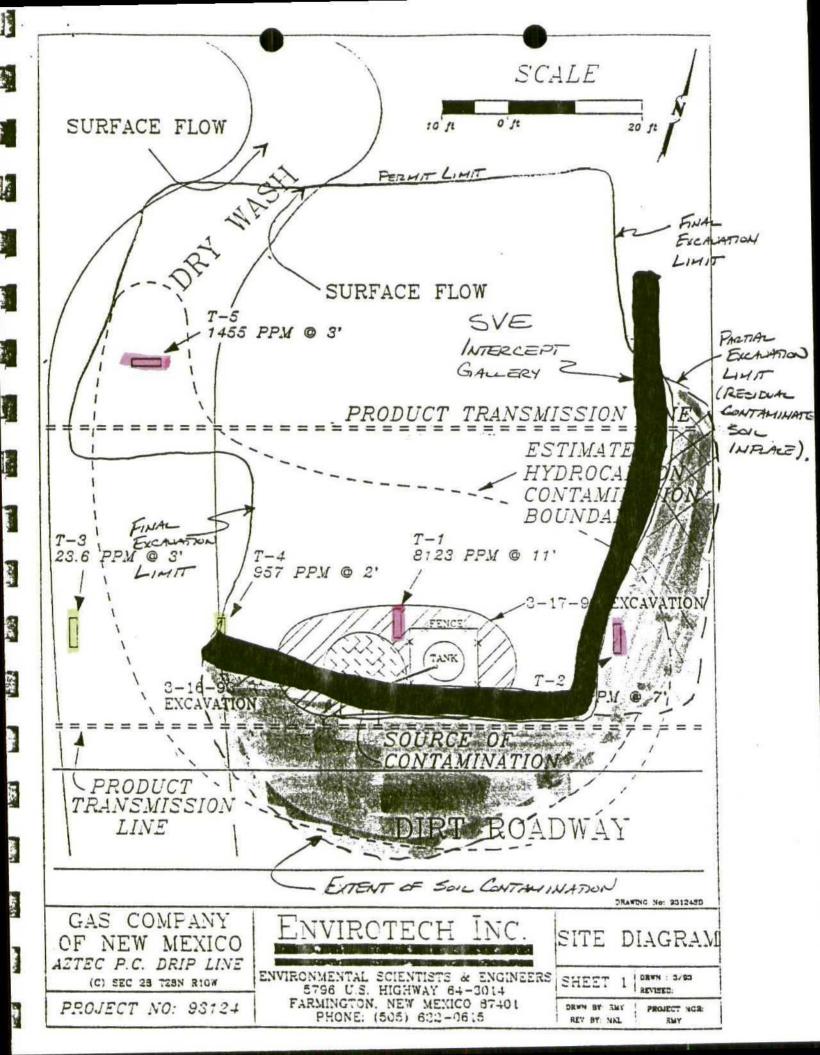
William Olsen, NMOCD Santa Fe Office

Attachments:

Site Sketch

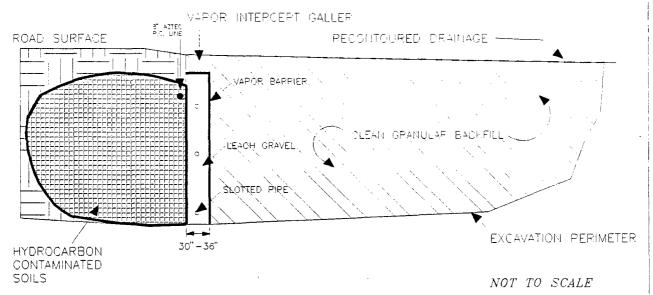
SVE Details

Envirotech Correspondence to GCNM, June 16, 1993

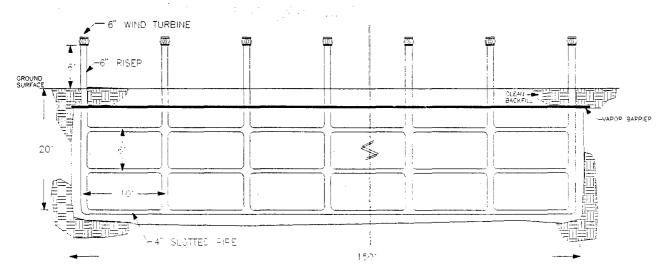


WEST ELEVATION

(AT APPROXIMATE CENTER)



NORTH-WEST ELEVATION



GENERAL SPECIFICATIONS

ITEM	EST. QUANTITY	DETAIL .
BACK FILL	5000-7000 sy	CLEAN SILTY SAND TO POOPLY GRADED SAND [15-007 PASSING 200 MESH]
INTERCEPT GALLEY	1501×151×31 (EST. FROM SITE PLAN	
LEACH GRAVEL 4 LATERALS 6 RISERS	250 cy 42. 10'x4" 15: 24'x6"	CLEAN POORLY GRACED K3" GRAVEL [K1072 PASSILE 11.5 4 MESH]
T. ABINE BARRIER	15 units 2700 sf	EXTERNALLY BRACED TURBINE VENTILATORS [147 OFF @ 4mm WIND]

PROPOSED SOIL VAPOR EXTRACTION SYSTEM PUBLIC SERVICE COMPANY OF NEW MEXICO AZTEC P.C. DRIF LINE SPILL INCIDENT (C) SEC 28. T28N. R10W NMPM

Environech Inc.

SVE DETAILS

SHEET 1

ENVIRONMENTAL SCIENTISTS & ENGINEERS
5796 U.S. HIGHWAY 64-3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

PROJECT NO: #3124

JULY 1993:

1110AL (2008) 302 0010

DRWN MKL FILE 3124SVE DATE: 7-15-93 UNDERGROUND TANK TESTING . SITE ASSESSMENT . SITE REMEDIATION

Project No: 93124

5796 U.S. HIGHWAY 64 - 3014 FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615

June 16, 1993

Mr. Mark McAndrews
Environmental Coordinator
Gas Company of New Mexico
P.O. Box 1899
Bloomfield, New Mexico 87413

RE: Assessment Drilling Results
Aztec P.C. Drip Line Project

Dear Mark:

Attached please find the drilling logs and a site diagram for drilling done on June 15, 1993 to determine the hydrocarbon plume extent at the Aztec P. C. Drip Line. Eight hours of drilling was completed at the site per the written communication dated June 9, 1993 between Mr. Verl Farnsworth of Envirotech and Mr. Eric Seelinger, Environmental Engineer for Public Service Company of New Mexico (attached).

Raw data is included as per my instructions and a probable plume boundary based on the drilling results is noted on the site diagram. Additional drilling would be required for a more accurate boundary determination, but the drilling completed was sufficient for a rough estimate.

Thank you for your assistance with this project. We appreciate the opportunity to serve you.

Respectfully submitted, ENVIROTECH, INC.

E O net

Robert E. O'Neill

Environmental Engineer

Attachments

REO/reo

93124-MM.LET

ENVIROTECHO INC.

UNDERGROUND TANK TESTING • SITE ASSESSMENT • SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014 FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615

June 9, 1993

Eric Seelinger Gas Company of New Mexico

Re: Proposal for area survey with drill rig

Dear Eric,

Envirotech Inc. will provide for the Gas Co. of New Mexico one (1) hollow stem drill rig with operator and helper with addition of one (1) technician to perform sampling for one (1) 8 hour day for the cost of \$1200.00 plus tax.

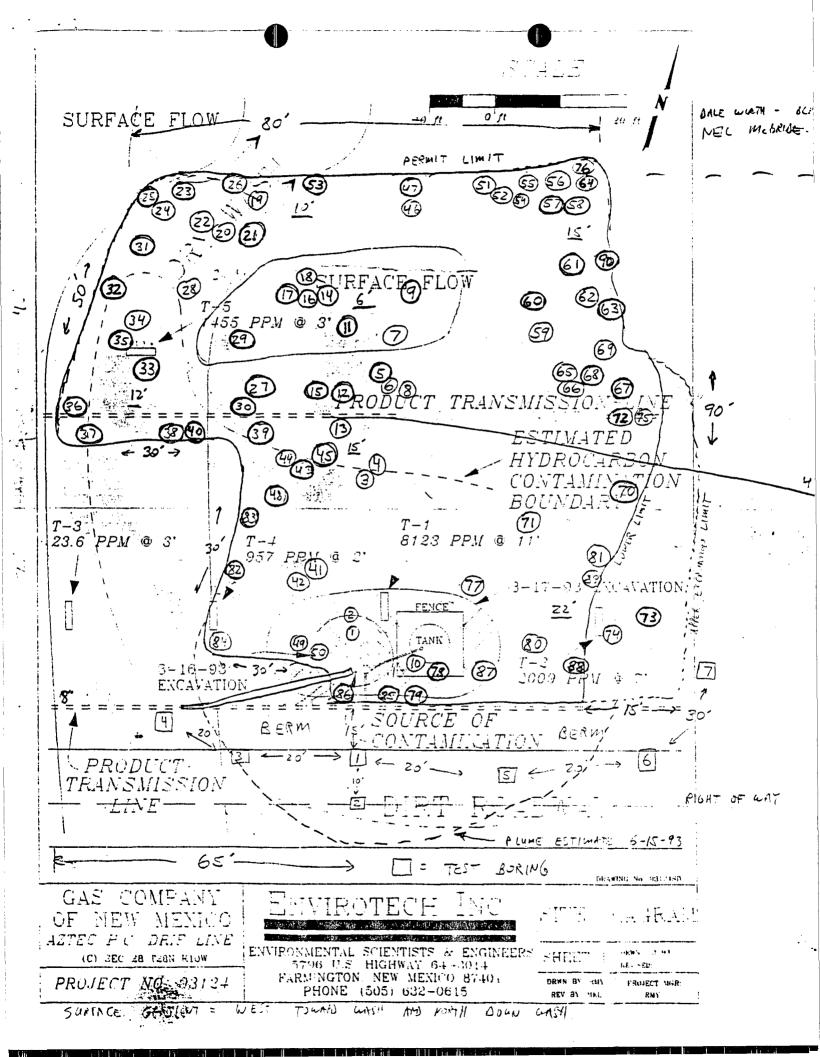
Boring will be as necessary with 20-25 anticipated. If drilling to be out side of the right-of-way, Gas Company will be responsible for permits.

Thank You,

Verl Farnsworth Construction Superintendent

Attachments: Site Map

01/11



ENVIROTECH INC. FIELD BORDS LOS

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ENVIROTECH DIC. FIELD BORDS LOG

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ENVIROTECH DNC. FIELD BORDS LOG

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ENVIROTECH PIC. FELD EDENS LOS

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ENVIROTECH INC. FIELD EDENIE LOG

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Public Service Company of New Mexico

Tuesday, June 29, 1993

Denny G. Foust
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division

JUL 2 1993
OIL CON. DIV.

1000 Rio Brazos Road Aztec, New Mexico 87410

Subject: Condensate spill from a drip on the Aztec PC gathering system

Dear Mr. Foust;

The attached documentation should indicate that the extent of the spill is not that great. The highest reading on the latest assessment performed by Envirotech is 770 ppm at bore hole 1. At this point in time I propose that we construct an intercept trench to contain any remaining hydrocarbons that may migrate downhill. I also propose that a vent be installed on one end of the leaching pipe to allow ventilation of any hydrocarbons. A copy of the proposed trench is attached.

I am attaching the following letter that I am sending to Envirotech for completion of work. I am also attaching a copy of the assessment that was performed on the site which indicates the hydrocarbon levels of the soil.

Please let me know if this proposed method is acceptable to handle the remaining hydrocarbons.

If you have any questions or if I can be of any further assistance, please give me a call at 848-2659.

Sincerely,

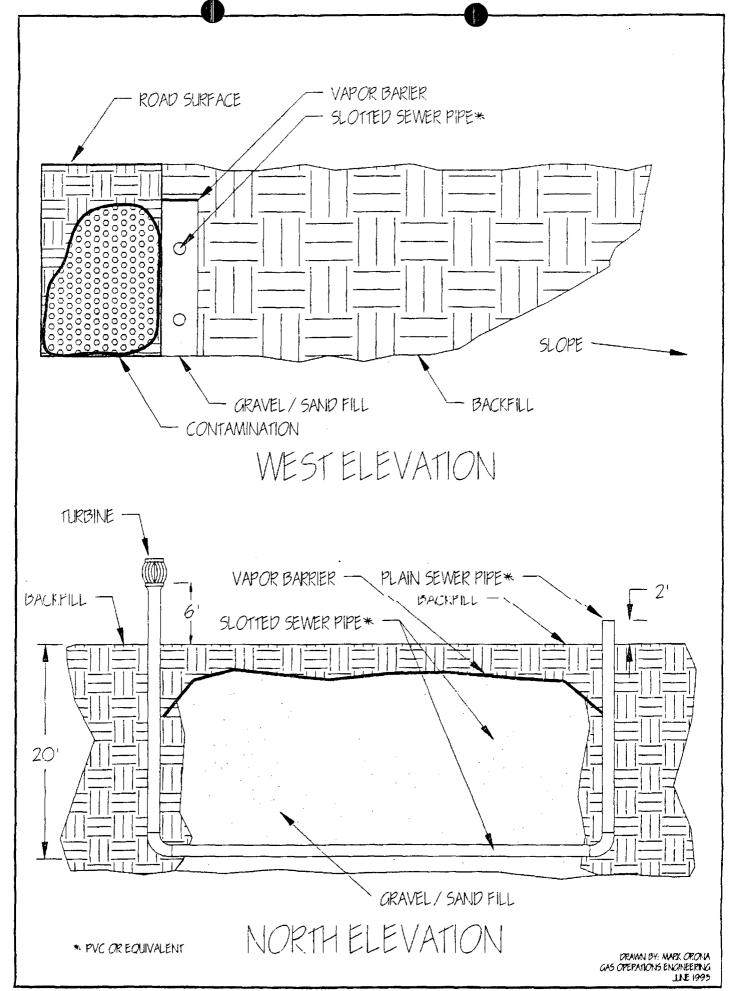
Erick Seelinger

Environmental Engineer

c:

Harry Schanning Jerry Godwin J.D. Barnett

Aivanido Square Albuquerque, New Mexico 87158 505/848-2700



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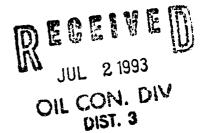
Public Service Company of New Mexico

Tuesday, June 29, 1993

Veryl Moore ENVIROTECH INC. 5796 U.S. Highway 64-3014 Farmington, New Mexico, 87401

Subject: Aztec PC Mainline Drip Cleanup

Dear Mr. Moore



We had spoke last Friday regarding the filing up of the hole at the Aztec PC gathering line drip. You said you were willing to fill up the hole as part of the original contract. That is fine; however, would you please submit a written estimate of the costs to do the following work:

- 1. Construct the intercept trench as illustrated (attached.)
- 2. Remove the dirt that is stacked beside the road that is still contaminated. As I recall, there were two contaminated and one clean.
- 3. Dig the remaining amount of dirt in the hole that is just North of the drip, and about 6 feet down. I believe that it is still in excess of the 100 ppm hydrocarbon cleanup levels.

I have attached what I have supplied to the OCD. Please give me a call if you have any further questions.

Sincerely

Erick Seelinger

ENVIROTECH

UNDERGROUND TANK TESTING . SITE ASSESSMENT . SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014 FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615

June 16, 1993

Mr. Mark McAndrews Environmental Coordinator Gas Company of New Mexico P.O. Box 1899 Bloomfield, New Mexico 87413 OIL CON. DIV.

Assessment Drilling Results RE:

Aztec P.C. Drip Line Project

Project No: 93124

Dear Mark:

Attached please find the drilling logs and a site diagram for drilling done on June 15, 1993 to determine the hydrocarbon plume extent at the Aztec P. C. Drip Line. Eight hours of drilling was completed at the site per the written communication dated June 9, 1993 between Mr. Verl Farnsworth of Envirotech and Mr. Eric Seelinger, Environmental Engineer for Public Service Company of New Mexico (attached).

Raw data is included as per my instructions and a probable plume boundary based on the drilling results is noted on the site diagram. Additional drilling would be required for a more accurate boundary determination, but the drilling completed was sufficient for a rough estimate.

Thank you for your assistance with this project. We appreciate the opportunity to serve you.

Respectfully submitted, ENVIROTECH, INC.

Robert E. O'Neill

Polit EOY

Environmental Engineer

Attachments

REO/reo

93124-MM.LET

Envirotech Inc.

UNDERGROUND TANK TESTING . SITE ASSESSMENT . SITE REMEDIATION

5796 U.S. HIGHWAY 64 - 3014 FARMINGTON, NEW MEXICO 87401 PHONE: (505) 632-0615

June 9, 1993

Eric Seelinger
Gas Company of New Mexico

Re: Proposal for area survey with drill rig

Dear Eric,

Envirotech Inc. will provide for the Gas Co. of New Mexico one (1) hollow stem drill rig with operator and helper with addition of one (1) technician to perform sampling for one (1) 8 hour day for the ccst of \$1200.00 plus tax.

Boring will be as necessary with 20-25 anticipated. If drilling to be out side of the right-of-way, Gas Company will be responsible for permits.

Thank You,

Verl Farnsworth
Construction Superintendent

Attachments: Site Map

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ENVIROTECH PNC.

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