

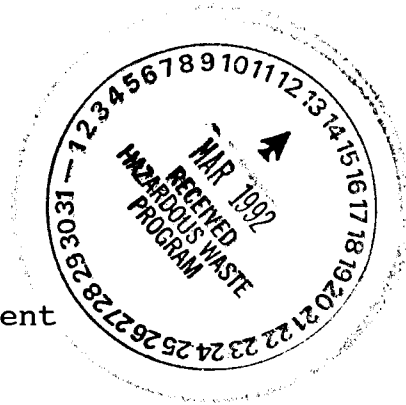
Transwestern Pipeline Company

TECHNICAL OPERATIONS

P. O. Box 1717 • Roswell, New Mexico 88202-1717

March 10, 1992

Dr. Bruce Swanton
HRMB Technical Group Supervisor
State of New Mexico Environment Department
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502



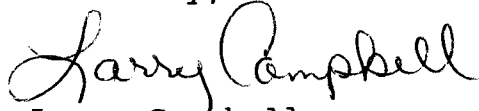
Dear Dr. Swanton:

In reference to the February 14, 1992 meeting for remediation of the disposal pits at the Roswell Compressor Station, enclosed please find the following requested information:

- 1) A copy of a MSDS information for the corrosion inhibitor used in the pipeline operation is included. I was informed by our corrosion specialist that this product, Nalco 4910 Corrosion Inhibitor has been in use for at least the last 7 years.
- 2) Attached is a copy of a letter from the State of New Mexico, which owns the surface rights to the area offsite, granting access to perform the drilling study.
- 3) Upon further investigation, depth to groundwater in the site vicinity is at approximately 70 feet. This information was generated from a monitoring well located approximately .5 miles south of the pit locations. The Pecos Valley Artesian Conservancy District maintains operation of the well. They are located in Roswell.
- 4) As a point of historic data, the pits were first opened in 1959. They were in service until 1986, when at that time, they were then backfilled.

I hope this information is helpful in the analyses of the pit review study. If you should require any additional information, contact me at 625-8022.

Sincerely,

A handwritten signature in cursive script that reads "Larry Campbell". The signature is written in dark ink and is positioned above the typed name.

Larry Campbell
Compliance Environmentalist

xc: Rich Jolly
Grant Rogers
Doc Alpers



MATERIAL SAFETY DATA SHEET

PRODUCT VISCO 4910 CORROSION INHIBITOR

Emergency Telephone Number

Medical (312) 920-1510 (24 hours)

SECTION 1 PRODUCT IDENTIFICATION

TRADE NAME: VISCO 4910 CORROSION INHIBITOR

DESCRIPTION: Fatty acid polyamine alkyl aryl salts and alcohols in a heavy aromatic naphtha

NFPA 704M RATING 1 HEALTH 3 FLAMMABILITY 0 REACTIVITY 0 OTHER
0=Insignificant 1=Slight 2=Moderate 3=High 4=Extreme

SECTION 2 HAZARDOUS INGREDIENTS

Our hazard evaluation has identified the following chemical ingredient(s) as hazardous under OSHA's Hazard Communication Rule, 29 CFR 1910.1200. Consult Section 14 for the nature of the hazard(s).

INGREDIENT(S)	CAS #	APPROX.%
Methyl alcohol	67-56-1	1-10
Isopropyl alcohol	67-63-0	1-10
Isobutyl alcohol	78-83-1	1-10
Heavy aromatic naphtha	64742-94-5	40+

SECTION 3 PRECAUTIONARY LABEL INFORMATION

Warning: Flammable. Do not use, store, spill or pour near heat, sparks or open flame. Causes irritation to skin and eyes. Keep container closed when not in use. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Avoid prolonged or repeated breathing of vapor. Use with adequate ventilation. Do not take internally.

Empty containers may contain residual product. Do not reuse container unless properly reconditioned.

SECTION 4 FIRST AID INFORMATION

EYES: Flush with water for 15 minutes. Call a physician.
SKIN: Flush with water for 15 minutes.
INGESTION: Do not induce vomiting. Give water. Call a physician.
INHALATION: Remove to fresh air. Treat symptoms. Call a physician.

NOTE TO PHYSICIAN: No specific antidote is known. Based on the individual reactions of the patient, the physician's judgment should be used to control symptoms and clinical condition.

CAUTION: If unconscious, having trouble breathing or in convulsions,



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SECTION 4 FIRST AID INFORMATION

(CONTINUED)

do not induce vomiting or give water.

SECTION 5 HEALTH EFFECTS INFORMATION

PRIMARY ROUTE(S) OF EXPOSURE: Eye, Skin, Inhalation

- EYE CONTACT: Can cause severe irritation.
- SKIN CONTACT: May cause irritation with prolonged contact. Can cause moderate irritation.
- INGESTION: Can cause blindness. Can cause central nervous system depression, nausea, dizziness, vomiting or unconsciousness depending on the length of exposure and on the first aid action given. Can be harmful or fatal.
- INHALATION: Prolonged inhalation of mist or vapor may cause nausea, dizziness, light-headedness, vomiting or unconsciousness depending on the length of exposure and the first aid action given. May cause narcosis.

SYMPTOMS OF EXPOSURE: A review of available data does not identify any symptoms from exposure not previously mentioned, or identified in Section 6 or 14.

AGGRAVATION OF EXISTING CONDITIONS: A review of available data does not identify any worsening of existing conditions.

SECTION 6 TOXICOLOGY INFORMATION

ACUTE TOXICITY STUDIES: No toxicity studies have been conducted on this product.

SECTION 7 PHYSICAL AND CHEMICAL PROPERTIES

COLOR: Opaque brown	FORM: Liquid	ODOR: Musty
SOLUBILITY IN WATER:	Dispersible	
SPECIFIC GRAVITY:	0.91 @ 60 Degrees F	
pH (NEAT) =	5.9	ASTM E-70
VISCOSITY:	7.8 cps/8.6 cts/54.0 SUS	
	@ 60 Degrees F	ASTM D-445
POUR POINT:	Less than -34 Degrees F	ASTM D-97
FLASH POINT:	66 Degrees F (TCC)	ASTM D-56
VAPOR PRESSURE:	112 mm Hg @ 100 Degrees F	ASTM D-323
PERCENT VOLATILE BY WEIGHT:	6 @ 75 Degrees F	



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SECTION 7 PHYSICAL AND CHEMICAL PROPERTIES

(CONTINUED)

NOTE: These physical properties are typical values for this product.

SECTION 8 FIRE AND EXPLOSION INFORMATION

FLASH POINT: 66 Degrees F (TCC) ASTM D-56

EXTINGUISHING MEDIA: Based on the NFPA guide, use dry chemical, alcohol foam, carbon dioxide or other extinguishing agent suitable for Class B fires. Use water to cool containers exposed to fire. For large fires, use water spray or fog, thoroughly drenching the burning material.

UNUSUAL FIRE AND EXPLOSION HAZARD: May evolve NOx or SOx under fire conditions.

SECTION 9 REACTIVITY INFORMATION

INCOMPATIBILITY: Avoid contact with strong oxidizers (eg. chlorine, peroxides, chromates, nitric acid, perchlorates, concentrated oxygen, permanganates) which can generate heat, fires, explosions and the release of toxic fumes.

THERMAL DECOMPOSITION PRODUCTS: In the event of combustion CO, CO₂, NOx, SOx may be formed. Do not breathe smoke or fumes. Wear suitable protective equipment.

SECTION 10 PERSONAL PROTECTION EQUIPMENT

RESPIRATORY PROTECTION: If it is possible to generate significant levels of vapors or mists, a NIOSH approved or equivalent respirator is recommended.

For large spills, entry into large tanks, vessels or enclosed small spaces with inadequate ventilation, a pressure-demand, self-contained breathing apparatus is recommended.

VENTILATION: General ventilation is recommended. Additionally, local exhaust ventilation is recommended where vapors, mists or aerosols may be released.

PROTECTIVE EQUIPMENT: Wear gloves, boots, apron and a face shield with chemical splash goggles (ANSI Z 87.1 requirements and selection of gloves, goggles, shoes, etc.). A full slicker suit is recommended if gross exposure is possible.



PRODUCT VISCO 4910 CORROSION INHIBITOR

Emergency Telephone Number
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SECTION 10 PERSONAL PROTECTION EQUIPMENT

(CONTINUED)

The availability of an eye wash fountain and safety shower is recommended.

If clothing is contaminated, remove clothing and thoroughly wash the affected area. Launder contaminated clothing before reuse. Discard contaminated shoes and leather items.

SECTION 11 SPILL AND DISPOSAL INFORMATION

IN CASE OF TRANSPORTATION ACCIDENTS, CALL THE FOLLOWING 24-HOUR TELEPHONE NUMBER (312-920-1510)

SPILL CONTROL AND RECOVERY:

Small liquid spills: Contain with absorbent material, such as saw dust, clay, soil or any commercially available absorbent. Shovel reclaimed liquid and absorbent into recovery or salvage drums for disposal. Refer to CERCLA in Section 14.

Large liquid spills: Dike to prevent further movement and reclaim into recovery or salvage drums or tank truck for disposal. Refer to CERCLA in Section 14.

Keep the spill away from heat, sparks, flames and welding operations. Ventilate area and evacuate employees from exposure if the airborne concentration exceeds the TLV. Refer to Section 14.

DISPOSAL: If this product becomes a waste, it meets the criteria of a hazardous waste as defined under the Resources Conservation and Recovery Act (RCRA) 40 CFR 261. Hazardous Waste D001.

As a hazardous liquid waste, it must be solidified before disposal in a landfill (Hazardous Waste Treatment, Storage and Disposal facility). Can be incinerated in accordance with local, state and federal regulations.

SECTION 12 ENVIRONMENTAL INFORMATION

If released into the environment, see CERCLA in Section 14.

SECTION 13 TRANSPORTATION INFORMATION

DOT PROPER SHIPPING NAME/HAZARD CODE - FLAMMABLE LIQUID, N.O.S. UN 1993
CONTAINS - ISOPROPANOL



MATERIAL SAFETY DATA SHEET

PRODUCT VISCO 4910 CORROSION INHIBITOR

Emergency Telephone Number
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SECTION 14 REGULATORY INFORMATION

The following regulations apply to this product.

FEDERAL REGULATIONS:

OSHA'S HAZARD COMMUNICATION RULE, 29 CFR 1910.1200:

Based on our hazard evaluation, the following ingredients in this product are hazardous and the reasons are shown below.

Heavy aromatic naphtha - Skin irritant

Methyl alcohol = Flammable

Isopropyl alcohol = Flammable

Isobutyl alcohol = Flammable

Methyl alcohol = TWA 200 ppm, STEL 250 ppm (skin) ACGIH TLV
260 mg/m³, 310 mg/m³ ACGIH TLV

Isopropyl alcohol = TWA 400 ppm, STEL 500 ppm ACGIH TLV
980 mg/m³, 1225 mg/m³ ACGIH TLV

Isobutyl alcohol = TWA 50 ppm, STEL 75 ppm ACGIH TLV
150 mg/m³, 225 mg/m³ ACGIH TLV

Methyl alcohol = PEL 200 ppm, 260 mg/m³ OSHA TLV

Isopropyl alcohol = PEL 400 ppm, 980 mg/m³ OSHA TLV

Isobutyl alcohol = PEL 100 ppm, 300 mg/m³ OSHA TLV

Heavy aromatic naphtha = TWA 100 ppm TLV

Manufacturer's recommendation

CERCLA/SUPERFUND, 40 CFR 117, 302:

This product contains methanol, isobutanol, a Reportable Quantity (RQ) substance and if 100,000 pounds of product are released, it requires notification to the NATIONAL RESPONSE CENTER, WASHINGTON, D. C. (1-800-424-8802).

TOXIC SUBSTANCES CONTROL ACT (TSCA):

The chemical ingredients in this product are on the 8(b) Inventory List (40 CFR 710).

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), 40 CFR 261 SUBPART C & D:

If this product becomes a waste, it does meet the criteria of a hazardous waste as defined under RCRA 40 CFR 261 (consult Section 11).

FEDERAL WATER POLLUTION CONTROL ACT, CLEAN WATER ACT, 40 CFR 401.15 (formerly Sec. 307), 40 CFR 116 (formerly Sec. 311):

None of the ingredients are specifically listed.



PRODUCT VISCO 4910 CORROSION INHIBITOR

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SECTION 14 REGULATORY INFORMATION

(CONTINUED)

CLEAN AIR ACT, 40 CFR 60, SECTION 111, 40 CFR 61, SECTION 112:
This product contains the following ingredients covered by the Clean Air Act:

Methanol - Section 111
Isopropanol - Section 111
Isobutanol - Section 111

STATE REGULATIONS:**MICHIGAN CRITICAL MATERIALS:**

This product does not contain ingredients listed on the Michigan Critical Materials Register.

STATE RIGHT TO KNOW LAWS:

Regulated in those states using the TLV for methanol, isopropanol, isobutanol as a criteria for listing.

SECTION 15 ADDITIONAL INFORMATION

None

SECTION 16 USER'S RESPONSIBILITY

This product material safety data sheet provides health and safety information. The product is to be used in applications consistent with our product literature. Individuals handling this product should be informed of the recommended safety precautions and should have access to this information. For any other uses, exposures should be evaluated so that appropriate handling practices and training programs can be established to ensure safe workplace operations. Please consult your local sales representative for any further information.

SECTION 17 BIBLIOGRAPHY

SEE NALCO'S MSDS SECTION DESCRIPTION

PREPARED BY: John J. Kasper, MSc., Toxicologist
DATE ISSUED: 06/23/86



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

M E M O R A N D U M

TO: File

FROM: *Woz* Bruce Swanton, HRMB Technical Group Supervisor

THROUGH: Ed Horst
Benito Garcia

DATE: February 14, 1992

SUBJECT: Pigout waste disposal pits near Roswell

Met with Coby Muckelroy and Larry Campbell of Enron. Enron is the parent company of Transwestern Pipeline and Northern Natural Gas. Enron pipelines run from Liberal, Kansas and Monahan, Texas to Roswell, NM, then roughly parallels I-40, passing near Gallup then into Arizona. Gas is currently transported one way, east to west, but plans call for two-way transport at some time in the future.

Compressor station cleaning and pigout wastes from running "pig" through the pipelines and following with water for maintenance. Solvents, e.g., trichloroethane, have been used for degreasing at this compressor station and also disposed of in the pit. Most of the pigout waste contaminants are 3 to 15 carbon aliphatics. Corrosion inhibitors have been used. Mr. Campbell will submit MSDS sheets on these. Methanol has been used to de-ice the pipeline. Pit last received wastes after 1980.

There were three pits, about 25 feet deep, which have been backfilled. The native water table is at about 120 feet. Pits are in extreme NE corner of property. At extreme SW corner is a well owned by a local well Co-op. Stated to be used only for water level measurements. Mr. Campbell will submit contact names for Co-Op members. A perched saturated zone has built up due to liquid disposal in the pits. The saturated zone may be 30 feet thick (plate #2 of Metric 12/91 report). Water is hard, but likely to be less than 10,000 tds. Pit 1 seems to be the most highly contaminated, known 13 ppm TCA at 13 feet below surface level.

Transwestern thinks that results which show that deeper zones within the red clay are uncontaminated mean that the clay has acted as a complete barrier to vertical liquid movement through the clay zone.

cc: Bruce Swanton, HRMB
Roger Anderson, Oil Conservation Division/Energy & Minerals Dept.
Garrison McCaslin, Roswell District IV Office



BRUCE KING
GOVERNOR

State of New Mexico
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(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

February 17, 1992

Mr. Larry Campbell
Enron, Inc.
P.O. Box 1717
Roswell, NM 88202

RE: Roswell Compressor Station Pit Cleanup

Dear Mr. Campbell:

Enclosed please find a memo summarizing our last Friday, February 14. I had intended to copy you on the memo, but find I failed to do so. If you have any questions regarding this matter, please contact Dr. Bruce Swanton of my staff at (505) 827-4300.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edward Horst".

Edward Horst, RCRA Programs Manager
Hazardous and Radioactive Materials Bureau

EH/bas

misc/campbell.292



State of New Mexico

OFFICE OF THE

Commissioner of Public Lands

Santa Fe

JIM BACA
COMMISSIONER

P.O. BOX 1148
SANTA FE, NEW MEXICO 87504-1148

July 22, 1991

Transwestern Pipeline Co.
Attention: Rick Jolly
P.O. Box 1718
Roswell, New Mexico 88201

RE: Investigation of Contaminated Soils
(SW $\frac{1}{4}$ of Section 21 and NW $\frac{1}{4}$ of Section 28,
Township 9 South, Range 24 East)

Dear Mr. Jolly:

In response to your request dated July 17, 1991, please consider this correspondence as granting you permission to initiate the following: drill approximately 15 8" holes to a maximum depth of 45 feet for the purpose of obtaining soil samples which would be tested for contamination. The time period that the drilling will be allowed is from July 24, 1991 to August 2, 1991. If additional time is needed, please contact us accordingly.

Please be advised that the State Land Office and its employees are held harmless from any incident that might arise as a result of Transwestern's activities. If Transwestern is in agreement with holding the State Land Office harmless, then signify same by executing the signature block located at the bottom of this letter.

Please execute both copies and send us the one with the original signature. If you have any questions, please contact us.

Sincerely

E. Dwain Glidewell, Director
Surface Resources Division

WE UNDERSTAND AND ACCEPT THE AGREEMENT SET OUT HEREIN.

AUTHORIZED REPRESENTATIVE
Transwestern Pipeline Company

SUBSCRIBED AND SWORN TO BEFORE ME THIS 26th DAY OF July, 1991. MY
COMMISSION EXPIRES: February 17, 1995.

NOTARY PUBLIC