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Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

April 7, 1993

Ms. Barbara Hoditschek
Hazardous and Radioactive Bureau
New Mexico Environmental Department
1190 St. Francis Drive
Santa Fe, New Mexico 87502



Dear Ms. Hoditschek:

In reference to your February 17, 1993 correspondence concerning comments on the RCRA Part A application which was submitted by Transwestern Pipeline Company, enclosed find an amended Part A application. In addition, presented below are responses to the comments which your agency addressed in that letter. Identification and response for each comment has followed the numerical sequence of your attachment.

1. The term "scrubbed" refers to a process whereby naturally occurring liquids which are entrained in the natural gas are removed by a vessel referred to as a scrubber. The velocity and path of the gas as it passes through this vessel allows separation of the liquids from the gas. This is not considered a hazardous waste treatment. The process is designed only to remove liquids which will reduce efficiency of the gas as it travels in the pipeline.
- 2a. The liquid content which is associated with the gas is variable. In addition, the design and operation of the "scrubbers" are such that they automatically discharge for collection at irregular time intervals. As such, there was no way to record the liquid volumes which were directed into the surface impoundment. Similarly, records were not kept of the quantities and types of other solid and liquid wastes which were placed into the impoundment during the period of operation from approximately August of 1960 until June of 1986.
- 2b. During the 26 year operation, hazardous and non hazardous wastes were placed into the surface impoundment. The impoundment dimensions were approximately 20'x 20'x 15'. During a subsurface investigation of the area it was determined that liquids which were placed into the impoundment had vertically migrated into the subsurface soil layers. Gross calculations for the volume of the underlying liquids

are presently unknown. Transwestern is completing additional studies to more accurately calculate the volume of contaminated liquids present, and the plume of contamination which occurs.

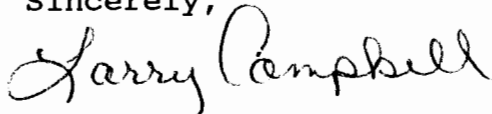
- 2c. A more accurate estimate of the annual quantity of wastes which entered the surface impoundment is not available as operating records were not kept for volumes of materials which were disposed of in the surface impoundment.
- 2d. Upon backfilling the surface impoundment in June of 1986, there have been no hazardous or non hazardous wastes placed into this feature. For future reference, this impoundment will not receive solid or liquids wastes of any type.
- 3a. Enclosed find a facility map entitled, "WASTE STREAMS & PROCESS CODES" which presents the legal description and boundaries of the Roswell Compressor Station.
- 3b. The location of each intake and discharge structure is provided on the facility map. Serial numbers for each structure were not assigned and are therefore not applicable.
- 3c. Transwestern Pipeline Company occasionally collects materials which are hazardous under Subtitle C. These liquids are collected into a dedicated tank, and removed as per test results of the liquids. The collection and removal of the liquids is not a part of the surface impoundment closure.
- 3d. The location of all processes listed in Item XII of the part A application are presented on the facility map.
- 3e. There are no injection wells present at this facility.
- 3f. Only one surface water body is present within 1/4 mile of the facility and is identified on the attached topographic map. This feature, is a livestock watering pond. There are no springs or water wells which are present with 1/4 mile of the facility.
- 4. A revised drawing of the facility is presented on the facility map.
 - 4a. The drawing is legible as per your request.
 - 4b. The areas occupied by all storage, treatment, or disposal areas relevant to the surface impoundment information are identified on the attached map.
 - 4c. The name of each operation associated with the impoundment activity is presented on the facility map.
 - 4d. The only area of past or prior storage, treatment, or disposal of hazardous wastes is the backfilled impoundment.

4e. The approximate dimensions or the property boundaries and dimensions of the surface impoundment are provided on the facility map.

5. Accompanying this submittal are photographs which depict the location of the backfilled surface impoundment area. In addition, photographs are included of the waste streams which may have contributed to the hazardous conditions of the impoundment. The process codes which are identified on the facility map are also presented on the photographs.

I hope this information is suitable for your needs. Should you require any additional information, contact our Roswell Technical Operations at 625-8022.

Sincerely,



Larry Campbell
Division Environmental Specialist

xc: Greg McIlwian w/o attachments
Rich Jolly
Lou Soldano
Roger Anderson
file

Enron Legal
OCD