STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

September 22, 1993

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE. NEW MEXICD 87504 (505) B27-5800

CERTIFIED MAIL RETURN RECEIPT NO. P-667-242-390

Mr. Larry Campbell
Transwestern Pipeline Company
Technical Operations
P.O. Box 1717
Roswell, New Mexico 88202-1717





RE: PRODUCT RECOVERY WELLS

TRANSWESTERN ROSWELL COMPRESSOR STATION

DISCHARGE PLAN GW-52 CHAVES COUNTY, NEW MEXICO

Dear Mr. Campbell:

The New Mexico Oil Conservation Division (OCD) is in receipt of Transwestern Pipeline Company's September 7, 1993 correspondence informing OCD of Transwestern's intent to install product recovery pumps in three monitor wells at their Roswell Compressor Station. The product recovery is being performed as part of a RCRA cleanup of contaminated ground water at the facility.

In order to incorporate the fluid handling from this system into the facility discharge plan, the OCD has the following questions and requests for information on the above referenced document:

- Please provide OCD with information regarding the disposition of fluids generated from the product recovery system.
- The document indicates that piping for the product recovery lines is to be located below ground inside a containment pipe with inspection ports. Is this system intended to be used for the detection of leaks from the product recovery tubing? If so, please provide OCD with an inspection schedule for the detection of leaks in the tubing.
- 3. Is the proposed tank for storage of recovered fluids to be located above ground or below grade? If the tank is to installed on the surface, the OCD requires that the tank be

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> bermed to contain 1 and 1/3 times the volume of the tank. If the tank is to be installed below grade, the OCD requires that the tank have secondary containment and a method of leak detection.

Receipt of the above information will allow OCD to complete a review of your product recovery system. If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson Hydrogeologist

Environmental Bureau

xc: OCD Artesia Office

Ed Horst, NMED Hazardous & Radioactive Materials Bureau