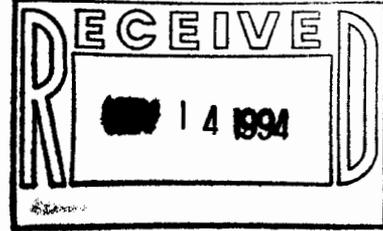


ENRON OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

November 9, 1994

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de Los Marquez
P.O. Box 26110
Santa Fe, NM 87502



RE: Extension of Time to Respond to the NOD dated September 28, 1994, and
Installation of an Upgradient Ground Water Monitor Well
Transwestern Pipeline Company Roswell Compressor Station

Dear Ms. Hoditschek,

Transwestern Pipeline Company (TPC) requests a seventy-five (75) day extension of time to respond to the Notice of Deficiency (NOD) issued by your office for the Closure Plan submitted by TPC for the former surface impoundments which were located at the TPC Roswell Compressor Station. The subject NOD was received by Larry Campbell, TPC Division Environmental Specialist, on October 3, 1994. The subject NOD required a thirty (30) day response from the date of receipt. Therefore, a seventy-five (75) day extension will require that TPC respond to the NOD on or before January 16, 1995.

As we had discussed in our meeting of November 1, 1994, TPC will submit to your office by January 16, 1995 a modified Closure Plan for the former surface impoundments which were located at the subject facility. The primary modifications to be made to the closure plan include:

- A phased approach soil assessment plan,
- A phased approach ground water assessment plan, and
- A soil and ground water sample analysis plan which will meet the criteria for a RCRA closure.

All other issues identified in the NOD will also be addressed within the modified Closure Plan or within a separate letter to your attention which will also be submitted on or before January 16, 1995. As a result of our meeting of November 1, 1994, we have already identified four issues which will be addressed separately from the modified Closure Plan. These issues and an anticipated response date is shown in Table 1 below:

Table 1. NOD issues to be addressed separately from the modified Closure Plan.

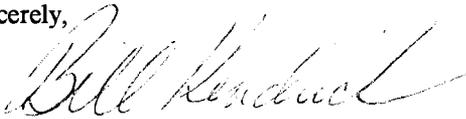
Issue to be Addressed	Anticipated Response Date
1. Installation of an upgradient monitor well in order to confirm the direction and gradient of ground water flow in the uppermost aquifer	with this letter
2. Status report for the interim corrective measures to remove separate phase hydrocarbon	11/18/94
3. Abandonment of the MW-1 recovery well	11/23/94
4. Sampling of the on-site regional aquifer monitor well and all other accessible water wells located within two (2) miles downgradient of the former surface impoundments	12/02/94

The objective of the first issue listed in Table 1 is to confirm the direction and gradient of ground water flow in the uppermost aquifer. This has been a significant concern of both the NMED and TPC due to the impact this issue has on the development of an acceptable Phase I ground water assessment plan. Therefore, in an attempt to resolve this issue prior to submittal of the modified Closure Plan, TPC will install one (1) upgradient (in the presumed upgradient direction) monitor well to the uppermost aquifer at the approximate location identified on the attached site diagram. The procedure and methods TPC will follow for the installation, development, and sampling of the upgradient well and for measurement of the static water level in selected on-site monitor and recovery wells is also attached.

At some point shortly following the completion of the newly installed monitor well, the location and elevation of each monitor well and recovery well located on-site will be determined by a certified professional surveyor. This information, combined with static water level measurements, should allow for an approximate determination of the direction and gradient of ground water flow in the uppermost aquifer. This information will also provide an accurate location of each of the existing on-site monitor and recovery wells relative to the facility boundaries and the former surface impoundments. All of this information would be presented and incorporated into the modified Closure Plan to be submitted.

If you have any questions regarding the request for an extension of time or the installation of an upgradient monitor well, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

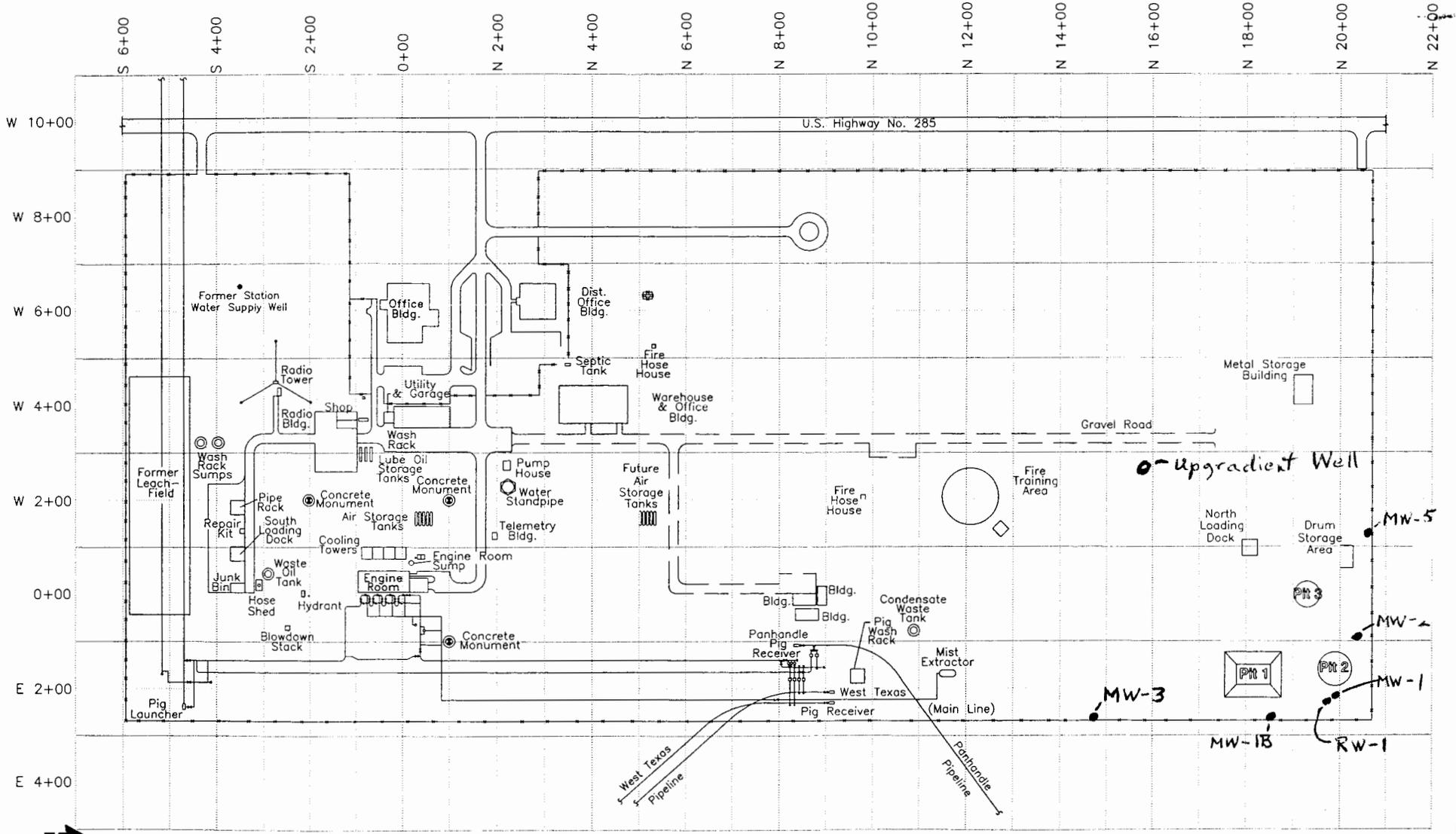
Sincerely,



Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

gcr/BK

cp w/enclosures: Roger Anderson NMOCD Santa Fe, NM



ROSWELL COMPRESSOR STATION
Site Plan

D\4115\2-1SP



DANIEL B. STEPHENS & ASSOCIATES, INC.

Procedure and Methods for the Installation of an Upgradient Ground Water Monitor Well at the TPC Roswell Compressor Station

1.0 Soil Boring Advancement and Soil Sample Collection and Analysis

TPC will contract with a licensed State of New Mexico water well driller to drill one soil boring to the top of the bedrock upon which the uppermost aquifer is perched (approximately 60 to 70 feet below ground surface). Soil samples will be collected from the boring with a split spoon sampler at every five (5) foot interval. Two samples will be collected from each five foot interval, one for field screening with a photoionization detector (PID) and the other for potential delivery to a laboratory for sample analysis. Upon termination of the soil boring at total depth, two soil samples will be selected for delivery to a laboratory, one from just above the ground water table and the other based upon the highest measured detection of volatile organic vapors as determined by field screening with the PID. Each sample will be analyzed for volatile organics by EPA Method 8240 and total petroleum hydrocarbons by EPA Method 418.1. The complete Appendix VIII constituents analysis will not be run due to the location of the soil boring which will be relatively distant from any known or suspected source of contamination. The purpose of the selected analyses is to confirm that the soil boring is in fact outside the immediate area of any potential contamination source.

2.0 Installation of a Two (2) Inch Diameter Monitor Well

A two (2) inch monitor well will be installed through the hollow stem augers following the completion of the soil boring. The monitor well will be constructed of two (2) inch diameter schedule 40 PVC pipe and will include, in ascending order, a bottom plug, fifteen (15) feet of flush-threaded 0.01-inch machine-slotted PVC screen, and blank casing from the top of the screen to approximately level with the ground surface. The well casing will be lowered into the borehole until the bottom of the screened interval is approximately ten (10) feet below the ground water table (or at the bottom of the boring if there is less than ten feet of saturated interval). A sandpack consisting of #10-20 mesh silica sand will be poured down the annulus of the auger in three (3) foot lifts. After each three (3) foot interval is filled, the augers will be pulled up approximately the same distance. This procedure will be repeated until the sand pack level is approximately two (2) feet above the top of the screened section. The annular space above the sand pack will then be filled with a minimum two (2) foot pelletized bentonite seal, which will be hydrated with distilled water. The remaining annular space will be filled with a cement/bentonite slurry grout consisting of approximately three (3) percent bentonite by weight. The top of the well casing will be protected by a PVC cap, and the exposed casing will be protected by a locking steel vault. A six (6) inch thick concrete pad will then be constructed around the vault.

3.0 Well Development and Ground Water Sample Collection and Analysis

The newly installed monitor well will be developed by a sequence of surging and pumping and/or bailing. Development will be considered complete when the water becomes relatively clear. Ground water samples will be collected from the newly installed well 12-24 hours after well development is complete. Prior to sample collection, the well will be purged a minimum of three (3) casing volumes in order to remove standing/stagnant water and to ensure the collection of representative samples. Following purging, ground water samples will be collected as soon as possible. All samples will be collected in precooled, acidified, certified-clean 40-mL glass vials with septum caps supplied by the laboratory. Samples will be delivered to the laboratory for analysis for volatile organics by EPA Method 8240 and total petroleum hydrocarbons by EPA Method 418.1. The complete Appendix IX ground water monitoring list analyses will not be run at this time since this will be included in the Phase I ground water assessment plan. The primary purpose of the selected analyses is to confirm that the monitor well is in fact outside and upgradient of any potential contamination source.

4.0 Measurement of Fluid Levels in Selected On-Site Monitor and Recovery Wells

Immediately prior to collection of ground water samples from the newly installed monitor well, the static water level will be measured to the nearest 0.01 foot using an electrical water level sounder. Immediately following collection of ground water samples from the newly installed monitor well, the static water level will be measured in monitor wells MW-3 and MW-5 to the nearest 0.01 foot using an electrical water level sounder. The hydrocarbon/water interface and the static water level will be measured in recovery wells MW-1B and MW-2 to the nearest 0.01 foot using an electrical interface probe. The recovery pumps in recovery wells MW-1B and MW-2 will be shut off at least 24 hours prior to taking the level measurements. The pumps in recovery wells MW-1 and RW-1 will not be shut off during this data collection event.