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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 3, 1995

Mr. Larry Campbell
Division Environmental Specialist
Transwestern Pipeline Company
Roswell, New Mexico 88202-1717

RE: **Abandonment and Plugging of Monitor Well MW-1
Roswell Compressor Station RCRA Surface Impoundment Closure**

Dear Mr. Campbell:

On November 30, 1994 the Hazardous and Radioactive Materials Bureau (HRMB) received Transwestern Pipeline Company's (TW) request to continue use of well MW-1 at the Roswell Compressor Station RCRA site. HRMB agrees that pumpage of these zones of saturation should continue until additional information is gained from the investigations scheduled during the closure activities. HRMB approves TW's request to continue to recover hydrocarbon liquids from MW-1 and to not plug this well at this time considering the following:

Recharge to the upper zone of saturation will continue to supply a potential source of contamination to the uppermost aquifer through the continuous gravel pack in MW-1. The vertical flux of liquids from the upper zone of saturation to the uppermost aquifer has not been determined; however, the current flux of Phase Separated Hydrocarbons (PSH) from the uppermost zone of saturation to the uppermost aquifer is most probably small in comparison to the initial flux encountered when the well was initially drilled.

When MW-1 was drilled it could be assumed that the majority of PSH entered the uppermost aquifer at that time. Since the drilling of MW-1, seepage of PSH through the continuous gravel pack has probably contributed a much smaller quantity of PSH to the uppermost aquifer. The upper zone of saturation has been greatly depleted through pumping of MW-1; however, during recharge events PSH are most likely to be released from the matrix of the clays and other geologic materials providing a source of contamination to the uppermost aquifer. It is currently unknown if the gravel pack in MW-1 is providing a significant pathway for contamination to the uppermost aquifer.

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The interim status report submitted on November 16, 1994 indicates that on October 16, 1994 the measured thickness of PSH in MW-1 was 10.5 feet. The greatest thickness of PSH measured at TW is in MW-1 which would strongly suggest that MW-1 has provided a significant pathway for migration of PSH from the upper zone of saturation to the uppermost aquifer. HRMB believes that the recovery of the PSH from the uppermost aquifer from MW-1 outweighs the alternative of plugging this well at this time.

Interestingly, monitor wells MW-2 and MW-1B, presumed upgradient from MW-1, had PSH thicknesses of 3 feet and 1.81 feet, respectively, as reported in the October interim report. The presence of PSH upgradient from MW-1 may indicate more than one source of contamination with additional subsurface pathways. Additional information is needed to determine if MW-1 provides a significant pathway for contamination to the uppermost aquifer. The investigations scheduled during closure of the surface impoundments will provide data needed to make the above determination.

Should you have any questions concerning this matter please contact Ms. Teri Davis of my staff at 827-4308.

Sincerely,


Ronald A. Kern, Program Manager
RCRA Technical Compliance Program

cc: Barbara Hoditschek, HRMB
Teri Davis, HRMB
Cornelius Amindias, HRMB
Marc Sides, EPA
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