

# ENRON OPERATIONS CORP.

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

March 13, 1996

## VIA FEDERAL EXPRESS

Mr. Benito Garcia  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
Harold Runnels Bldg.  
P. O. Box 26110  
Santa Fe, NM 87502



**RE: Transwestern Pipeline Company  
Roswell Compressor Station**

Dear Benito:

As you may recall, a great deal of discussion at our meeting last week centered around a shallow soil gas survey conducted for Transwestern in 1990. Concerns were raised as to whether or not Transwestern's proposed Phase II assessment plan, which Transwestern provided to the HRMB staff in December, 1995, adequately addressed possible TCA contamination identified in the survey (see attached Figure 3-2 from the January, 1995, closure plan). Because a considerable amount of time had passed since the soil gas survey, recalling the details of that event during our meeting was difficult at best. However, as I indicated during the meeting, the soil gas survey issue had been addressed with soil borings and soil sample analysis. That information has been made available to the HRMB and the OCD for review as presented below.

The first soil borings drilled to assess the apparent TCA soil gas plume were drilled during Spring 1990 by HLA. During this assessment, three soil borings were advanced near the center of the soil gas plume and two borings were advanced at the perimeter (see attached Figure 3-3 from the January, 1995, closure plan). Soil sample analyses for halocarbons were completed in an on-site lab on samples from two of the five soil borings, SB9-6 and P9-OS-349. The soil sample analysis results from these two borings indicated the samples were non-detect for 1,1,1-TCA (see attached Table 3-2 pages 1 & 2 from the January, 1995, closure plan).

The second set of soil borings drilled to assess the apparent TCA soil gas plume were drilled during mid-1991 by Metric Corporation. One of the primary objectives of this assessment was to re-evaluate the apparent TCA soil gas plume due to questionable analytical methods and quality assurance measures utilized by the on-site lab used during the previous assessment program. During the Metric assessment, three soil borings were advanced near the center of the soil gas plume and one boring was advanced at the perimeter (see attached Figure 3-4 from the January,

Mr. Benito Garcia  
March 13, 1996  
Page 2

1995, closure plan). Soil sample analyses were completed for 22 soil samples collected from these four soil borings. The soil sample analysis results indicated the samples were all non-detect for 1,1,1-TCA (see attached Table 3-2 pages 3-5 from the January, 1995, closure plan). Note that seven of the soil samples analyzed were obtained from a boring, SG-349, which was located adjacent to the location of the highest soil gas measurement.

Although it appears to Transwestern that the issue of adequate characterization of the apparent soil gas plume has been properly addressed, Transwestern is taking another close look at the entire plan and would appreciate any comments or suggestions you or your staff may have with respect to the proposed Phase II assessment plan, including any issues related to the soil gas surveys.

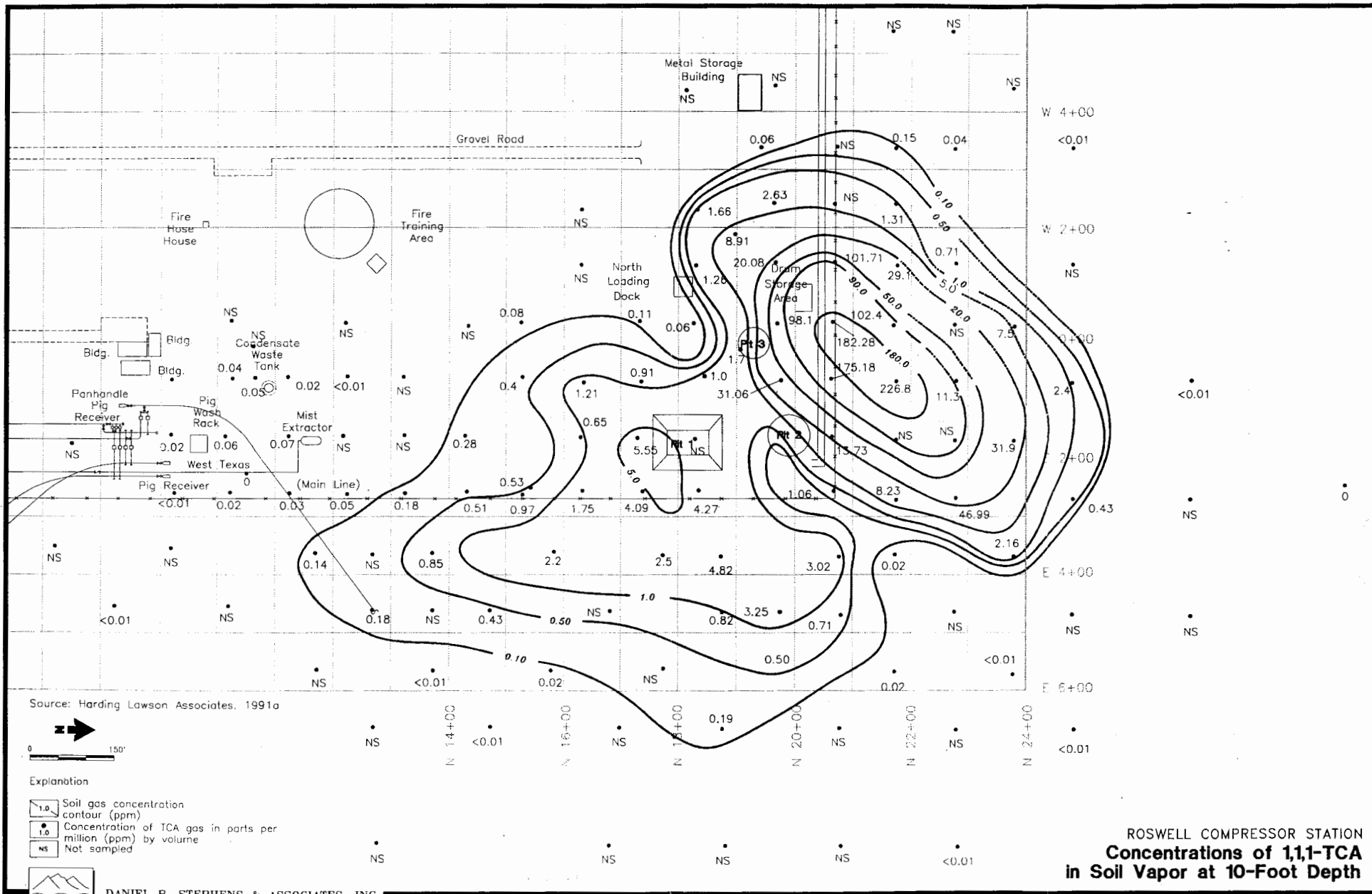
Please contact me at your earliest convenience at (713) 853-7644 so that we may discuss this specific issue in greater detail.

Sincerely,

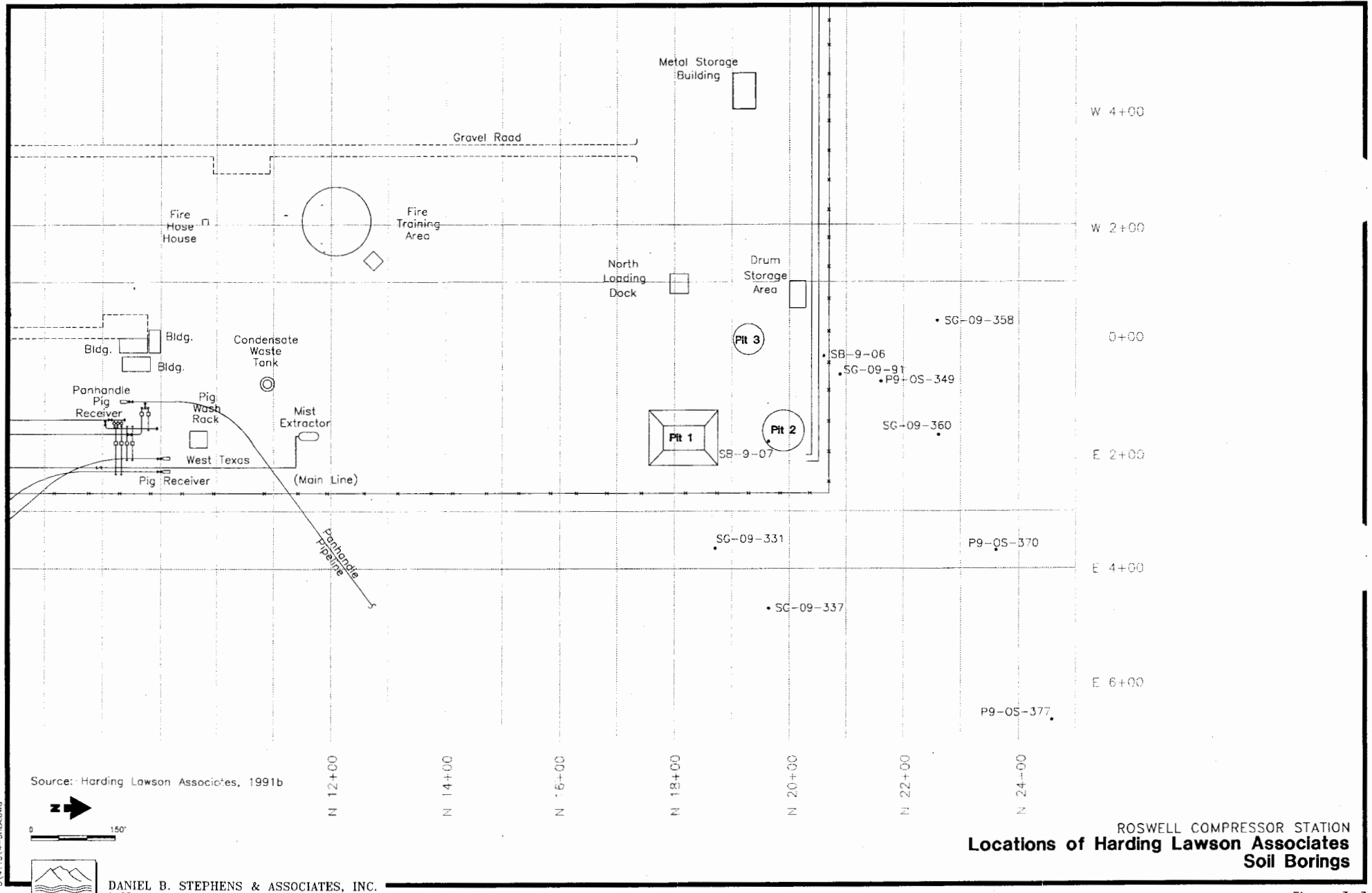


Bill Kendrick  
Manager, Projects Group  
Environmental Affairs Dept.

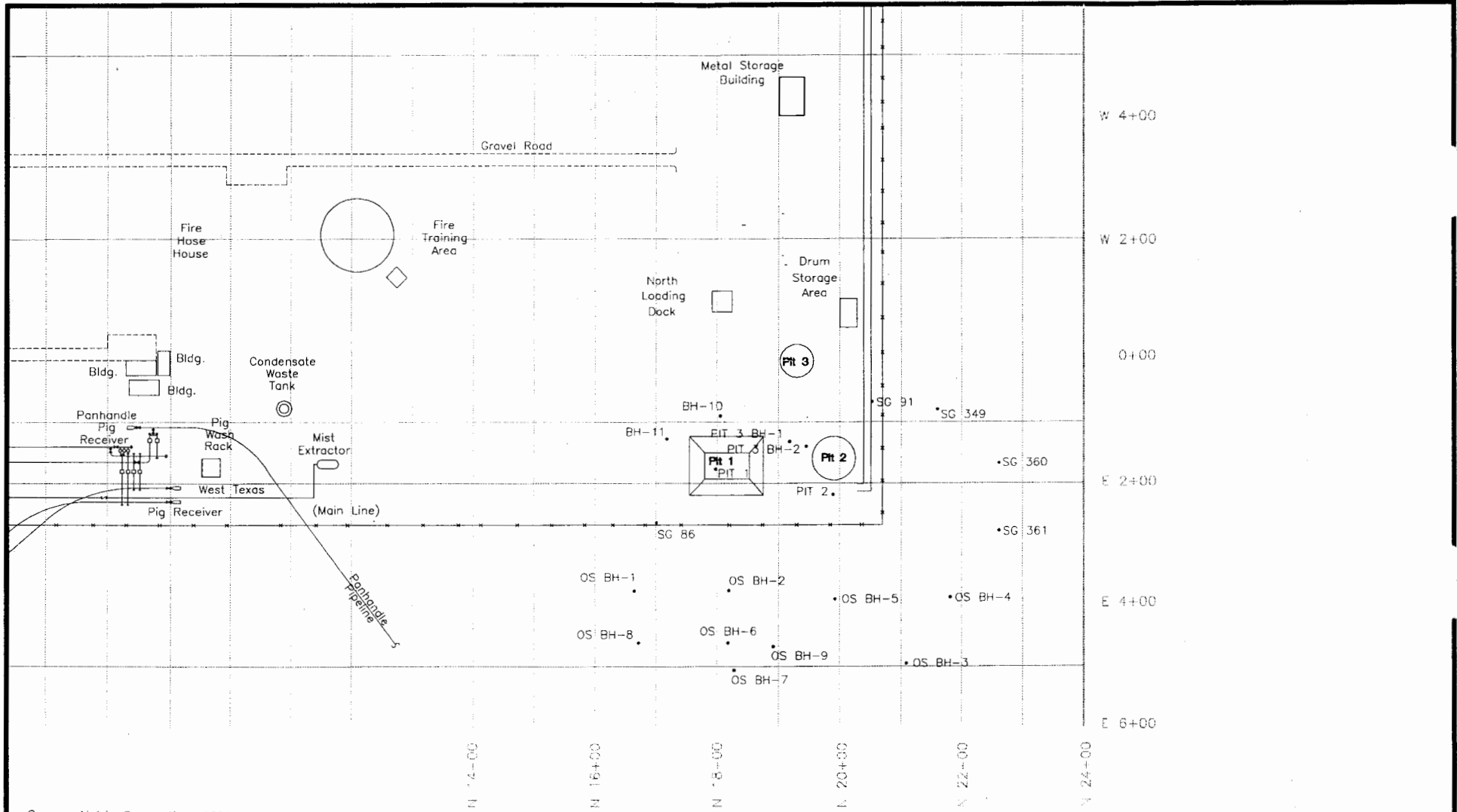
xc:	Mark Weidler	NMED Secretary
	Susan McMichaels, Esq.	NMED Office of the General Counsel
	Roger Anderson	NMOCD
	Joe Hulscher	Transwestern Pipeline Company
	Larry Campbell	Transwestern Pipeline Company
	George Robinson, P.E.	Cypress Engineering Services
	Lou Soldano, Esq.	ENRON Operations Corp.
	Richard L. C. Virtue, Esq.	Taichert, Wiggins, Virtue & Najjar



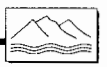
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Source: Metric Corporation, 1991



DANIEL B. STEPHENS & ASSOCIATES, INC.  
1-95 JN4115

ROSWELL COMPRESSOR STATION  
Locations of Metric Corporation  
Soil Borings

Figure 3-4

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**Table 3-2. Summary of Organic Compounds Detected in Soil Samples  
Roswell Compressor Station No. 9  
Page 1 of 6**

Sample ID	Source <sup>2</sup>	Concentration <sup>1</sup>													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH (mg/kg)
SB9-6 @ 8-11'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20
SB9-6 @ 18-20'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20
SB9-6 @ 20-23'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	120
SB9-6 @ 26-28'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20
SB9-6 @ 26-28' Tube #5	HLA	<5	ND	<10	<5	ND	<5	ND	6	16	ND	ND	<5	<5	<20
SB9-6 @ 26-28' Tube #6	HLA	<7	ND	<14	<7	ND	<7	ND	23*	9*	ND	ND	<7	<7	<20
SB9-7 @ 9-12'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1100
SB9-7 @ 21.5-24'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2000
SB9-7 @ 25.5-28'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2500
SB9-7 @ 29-32'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	11000
SB9-7 @ 29-32' Tube #7	HLA	<1300	ND	<2600	<1300	ND	<1300	ND	5100	<1300	ND	ND	720	1800	5000
SB9-7 @ 35-37'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4600
SB9-7 @ 35-37' Tube #8	HLA	<640	ND	<1300	<640	ND	<640	ND	<640	<640	ND	ND	1800	4200	13000
SB9-7 @ 35-37' Tube #9	HLA	2000	ND	<1300	<670	ND	2100	ND	<670	<670	ND	ND	2800	6500	30000
P9-OS-349 @ 5'	HLA	<5	ND	<11	<5	ND	<5	ND	26*	6*	ND	ND	<5	<5	<20
P9-OS-349 @ 10'	HLA	<6	ND	<11	<6	ND	<6	ND	18	9	ND	ND	<6	<6	100
P9-OS-349 @ 20'	HLA	<5	ND	<11	<5	ND	<5	ND	45*	<5*	ND	ND	<5	<5	<20
P9-OS-349 @ 25'	HLA	<5	ND	<11	<5	ND	<5	ND	21	10	ND	ND	<5	<5	100

<sup>1</sup> Concentrations are in µg/kg unless otherwise noted

<sup>2</sup> HLA = Harding Lawson Associates (1991a)

Metric = Metric Corporation (1991)

B&R = Brown and Root Environmental (1993)

Note: All HLA analyses performed in on-site mobile laboratory

1,1,1-TCA = 1,1,1-Trichloroethane

1,1-DCA = 1,1-Dichloroethane

PCA = Tetrachloroethane

PCE = Tetrachloroethene

Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane

TPH = Total petroleum hydrocarbons

NA = Not analyzed

ND = Not detected

\* = Compound was also detected in the QC blanks



**Table 3-2. Summary of Organic Compounds Detected in Soil Samples  
Roswell Compressor Station No. 9**

Page 2 of 6

Sample ID	Source <sup>2</sup>	Concentration <sup>1</sup>													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH (mg/kg)
P9-OS-349 @ 30'	HLA	<7	ND	<14	<7	ND	<7	ND	45*	<7	ND	ND	<7	<7	<20
P9-OS-349 @ 35'	HLA	<7	ND	<14	<7	ND	<7	ND	39	15	ND	ND	<7	<7	<20
P9-OS-349 @ 40'	HLA	<5	ND	<10	<5	ND	<5	ND	40	8	ND	ND	<5	<5	<20
P9-OS-377 @ 5'	HLA	<6	ND	34*	<6	ND	<6	ND	<6	<6	ND	ND	<6	<6	200
P9-OS-377 @ 10'	HLA	<6	ND	27*	<6	ND	<6	ND	<6	<6	ND	ND	<6	<6	<20
P9-OS-377 @ 15'	HLA	<6	ND	27*	<6	ND	<6	ND	<6	11	ND	ND	<6	<6	<20
P9-OS-377 @ 20'	HLA	<7	ND	37*	<7	ND	<7	ND	<7	7	ND	ND	<7	<7	<20
P9-OS-377 @ 25'	HLA	<6	ND	<12	<6	ND	<6	ND	46	36	ND	ND	<6	<6	<20
P9-OS-377 @ 30'	HLA	<7	ND	<13	<7	ND	<7	ND	69	23	ND	ND	<7	<7	<20
Pit 1 @ 2.8-3.0'	Metric	3200	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	25000
Pit 1 @ 9.2-9.4'	Metric	19000	ND	NA	ND	ND	ND	260	NA	ND	NA	NA	NA	NA	39000
Pit 1 @ 13.5-13.7'	Metric	18000	590	NA	ND	200	ND	330	NA	ND	NA	NA	NA	NA	55000
Pit 1 @ 18.8-19.0'	Metric	330	ND	NA	ND	ND	ND	870	NA	ND	NA	NA	NA	NA	20000
Pit 1 @ 26.8-27.0'	Metric	ND	ND	NA	ND	ND	ND	160	NA	ND	NA	NA	NA	NA	11000
Pit 1 @ 30.6-30.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
Pit 1 @ 41.6-41.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	16
Pit 1 @ 43.5-43.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	56

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Pit 2 #1 @ 18.7-18.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
Pit 2 #2 @ 18.7-18.9'	Metric	370	ND	NA	ND	ND	ND	650	NA	ND	NA	NA	NA	NA	13000
Pit 2 @ 26.0-26.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	170
Pit 2 @ 29.1-29.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
Pit 2 @ 39.8-39.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	2600
Pit 2 @ 44.1-44.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	44
Pit 2 @ 57.5-57.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	250
Pit 2 @ 69.9-70.1'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
Pit 3 BH-1 @ 30.7-30.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
Pit 3 BH-2 @ 25.0-25.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
SG 86 @ 13.5-13.7'	Metric	240	ND	NA	ND	ND	ND	1900	NA	ND	NA	NA	NA	NA	18000
SG 86 @ 18.7-18.9'	Metric	ND	ND	NA	ND	ND	ND	230	NA	ND	NA	NA	NA	NA	5200
SG 86 @ 24.9-25.1'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 86 @ 35.0-35.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	8.0
SG 86 @ 40.5-40.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
SG 91 @ 28.6-28.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
SG 349 @ 0.0-1.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 349 @ 2.9-4.6'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND

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Page 4 of 6**

Sample ID	Source <sup>2</sup>	Concentration <sup>1</sup>													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH (mg/kg)
SG 349 @ 9.0-10.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 349 @ 14.0-14.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	
SG 349 @ 20.3-21.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	
SG 349 @ 5.3-26.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 349 @ 29.7-30.4'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
SG 360 @ 0.0-2.5'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 4.0-5.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 9.0-9.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 14.0-14.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 19.0-20.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 24.0-25.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 29.0-29.4'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	2.0
SG 361 @ 0.0-2.5'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 361 @ 4.0-5.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND*
SG 361 @ 9.0-10.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 361 @ 16.0-16.4'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	
SG 361 @ 19.5-19.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 361 @ 24.0-25.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND

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		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH (mg/kg)
SG 361 @ 38.0-39.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-1 @ 18.9-19.1'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	12
OS BH-1 @ 34.3-34.5'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-2 @ 9.9-10.1'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-2 @ 22.5-22.6'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-2 @ 31.1-31.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	68
OS BH-2 @ 41.8-42.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	24
OS BH-2 @ 55.2-55.4'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
OS BH-2 @ 69.0-69.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
OS BH-3 @ 21.0-21.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
OS BH-3 @ 44.1-44.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
OS BH-3 @ 54.7-55.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	16
OS BH-4 @ 27.5-27.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
OS BH-5 @ 14.0-14.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-5 @ 19.6-19.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
OS BH-5 @ 23.4-23.6'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	12
OS BH-6 @ 13.6-13.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	12
OS BH-6 @ 47.0-47.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND

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