

**ENRON
OPERATIONS CORP.**

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



April 23, 1996

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 Mr. Garcia:

During a recent meeting on April 1, 1996, between counsel for Transwestern and the NMED, it was agreed that Transwestern would prepare a brief description of the technical differences between the NMED HRMB modified closure plan (Closure Plan) assessment activities and the Phase II Soil and Ground Water Assessment Plan (Phase II Plan) currently under review by the OCD.

It is important to note that there are many more similarities than there are differences between the assessment activities described in the Closure Plan and those described in the Phase II Plan. However, for the purposes of this comparison, the more significant differences between the two plans are highlighted.

In general, the two plans differ in breadth of scope, that is, the Closure Plan attempts to prescribe all assessment activities from start to finish, whereas, the Phase II Plan is intended to supplement the Phase I assessment activities completed in August, 1995, and any additional assessment activities necessary to effectively characterize the site. In other words, the Phase I activities, plus the Phase II Plan activities, plus additional assessment activities, if any, have been developed to accomplish the same objectives set out by the Closure Plan. Therefore, for the purpose of making the attached comparison, the Phase I activities along with the Phase II Plan activities will be considered together when compared to the Closure Plan, which will be considered the basis for this comparison.

It should be noted that compared to the complexity of the modified Closure Plan document, the Phase II Plan document is relatively simple and straight forward. As was discussed at our last meeting in early March, Transwestern is interested in obtaining comments from your office prior to proceeding with the Phase II Plan activities to avoid any unnecessary duplication of efforts and delay in remediation. I hope the attached

Mr. Benito Garcia
April 23, 1996
Page 2

comparison is helpful to that end.

Transwestern is continuing its work on a remediation plan for the site that will be satisfactory to both the NMED and OCD and hopes to provide that to your department in the near future.

Sincerely,



Bill Kendrick
Environmental Affairs

xc:	Hon. Mark E. Weidler	NMED Cabinet Secretary
	Roger Anderson	NMOCD
	Richard Virtue, Esq.	Taichert, Wiggins, Virtue & Najjar
	Larry Campbell	Transwestern Pipeline Company
	Lou Soldano, Esq.	EOC Legal Counsel
	George Robinson, PE	Cypress Engineering Services, Inc.

Attachment

Brief description of the technical differences between the Closure Plan and the Phase II Plan assessment activities.

Waste and Unit Characterization Strategy (Section 4.0 of the Closure Plan)

Although this phase of assessment within the Closure Plan is assigned the misleading heading "Waste and Unit Characterization Strategy" (misleading because there is neither waste or a waste unit at this site to characterize), its primary objectives are: 1) to confirm the presence of the four potential source areas identified by historical reviews and prior assessments; and 2) to identify constituents of concern in affected soil.

Two of the four potential source areas (identified in the Closure Plan as the Pit 1 and Pit 2 areas) were assessed in August, 1995, in the course of the "at risk" assessment activities completed as described in the Phase I Soil and Ground Water Assessment report dated November 8, 1995. These activities mirrored those described in the Closure Plan with the exception that soil samples were not analyzed by EPA method 8040. Method 8040 is a method for the detection of phenol compounds and was excluded for several reasons: 1) Transwestern has no reason to suspect phenol compounds to be constituents of concern; 2) the more common phenol compounds could be detected by EPA method 8270 which was included in the Phase I analytical program; and 3) very few laboratories, including CORE Lab's laboratory in Denver (Transwestern's contract lab for this assessment), are set up to run EPA method 8040 because it is only rarely used.

The other two potential source areas (identified in the Closure Plan as the Pit 3 and SG 86 areas) are scheduled to be addressed by the Phase II Plan. The only deviations from the Closure Plan are: 1) the collection of one soil sample from each potential source area for laboratory analysis rather than two samples; and 2) the use of EPA method 8270 to detect phenol compounds rather than EPA method 8040 as previously described.

Soil Assessment (Section 4.7 of the Closure Plan)

The objective of this phase of assessment, as stated in the Closure Plan, is the delineation of the lateral and vertical extent of affected soil beneath and adjacent to the former impoundments.

Per the Closure Plan, this would be accomplished by an iterative process beginning with four soil borings advanced 300 feet north, south, east, and west of the center of Pit 1. Additional borings would be drilled contingent on the outcome of the four original borings. Soil samples were to be collected every 10 feet and delivered to a lab for analysis. The analyte list was to be developed subsequent to the "Waste and Unit Characterization".

The Phase II Plan will accomplish the same objective but with a slightly different selection of boring locations. Per the Phase II Plan, six soil borings (one being the MW-7 boring and the

other five the proposed monitor well locations as shown in the attached figure) will define the lateral extent of affected soil. A contingency is planned for the field selection of additional boring locations if needed to meet the objective. Soil samples will be collected every 10 feet and screened in the field with two samples from each boring delivered to a lab for analysis for volatile organic compounds (method 8010/8020) and total petroleum hydrocarbons (method 418.1).

Ground Water Assessment Plan (Section 5.0 of the Closure Plan)

The objective of this phase of assessment is to characterize affected ground water. Per the Closure Plan, this would be accomplished by a two phase process.

The first phase of the Closure Plan process would be to install three monitor wells downgradient of the former impoundments. The locations of these wells are drawn in on the attached figure. One of the three locations is at the same location as the monitor well MW-7 which was installed during the August, 1995, assessment activities. A second location is approximately 25 feet from the Phase II Plan proposed MW-12 location. The third location is approximately 65 feet from the Phase II Plan proposed MW-14 location. Note that the proposed Phase II Plan also includes three additional monitor wells at locations not covered by the Closure Plan activities (proposed monitor well locations MW-10, MW-11, and MW-13 as shown in the attached figure).

The analytical requirements of the first phase of the Closure Plan process included full 40 CFR Appendix IX constituents plus any additional constituents identified from the soil assessment activities. The Phase II Plan analytical program includes VOCs (method 8010/8020), PAHs (method 8100), major ions, total dissolved solids, and metals regulated by the NMWQCC.

The second phase of the Closure Plan ground water assessment process (Section 5.8 of the Closure Plan) called for the installation of additional monitor wells to be located 200 feet downgradient and lateral of any Phase I (that is, Phase I of the Closure Plan) monitor well for which a ground water sample indicates a constituent of concern above an action level. The proposed Phase II Plan does not attempt to prescribe further assessment in the event a Phase II monitor well location proves to be affected, rather, this is deferred to either a decision to be made in the field during the Phase II assessment activities or to a Phase III Plan which would be carried out soon after the completion and evaluation of Phase II information.

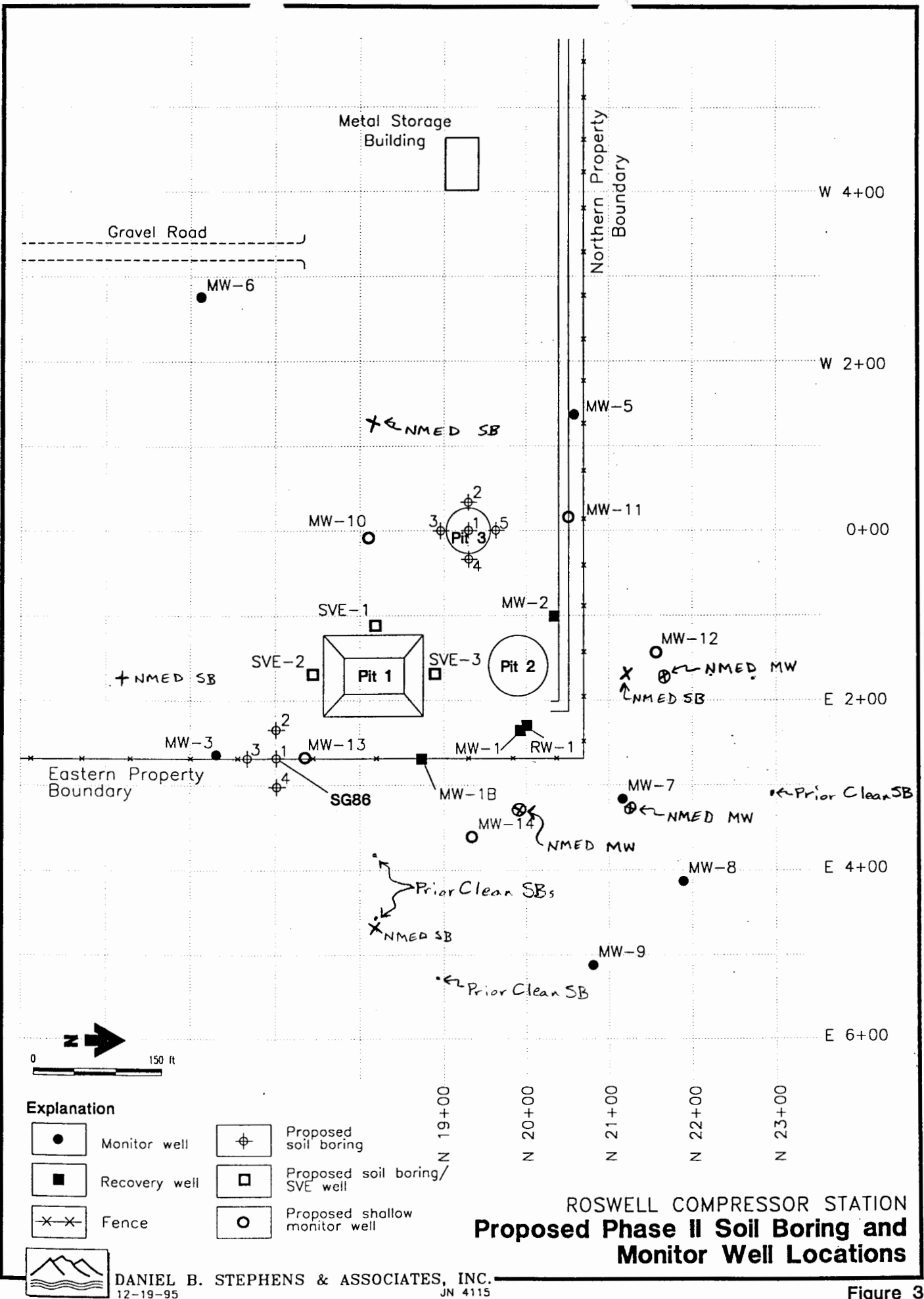
The second phase of the Closure Plan ground water assessment also called for the installation of a deeper aquifer ground water monitor well located downgradient of the former surface impoundments. The proposed Phase II Plan has deferred this activity to a Phase III Plan which would be carried out soon after the completion and evaluation of Phase II information.

Other (Activities not defined in the Closure Plan)

Although the Closure Plan makes reference that a corrective measures study (CMS) would be

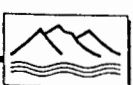
Mr. Benito Garcia
April 23, 1996
Attachment - Page 3

incorporated into the closure process, no specifics are defined in the plan. Based on Transwestern's experience with similar petroleum hydrocarbon release sites, it can be fairly certain that soil vapor extraction (SVE) will be an integral part of any corrective measures proposal developed for this site. Therefore, Transwestern has included in the Phase II Plan provisions for a limited duration SVE pilot test to be completed. Information obtained from a pilot test early in the closure process will give Transwestern a considerable jump on development and evaluation of more specific corrective measures options.



Explanation

- | | | | |
|--|---------------|--|-----------------------------------|
| | Monitor well | | Proposed soil boring |
| | Recovery well | | Proposed soil boring/
SVE well |
| | Fence | | Proposed shallow
monitor well |



DANIEL B. STEPHENS & ASSOCIATES, INC.
12-19-95 JN 4115

**ROSWELL COMPRESSOR STATION
Proposed Phase II Soil Boring and
Monitor Well Locations**

Figure 3

D:\4115\411508W.DWG