

File TN Red 96

Dear
Thank you.
I'll be
8/14
To: Mary
FYI



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

July 24, 1996

CERTIFIED MAIL
RETURN RECEIPT NO: P-269-269-174

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JUL 26 1996

NM ENVIRONMENT DEPARTMENT
OFFICE OF THE SECRETARY

Mr. Bill Kendrick
ENRON Operations Corp.
P.O. Box 1188
Houston, Texas 77251-1188

RE: PHASE II INVESTIGATION WORK PLAN
ROSWELL COMPRESSOR STATION
TRANSWESTERN PIPELINE CO.

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AUG 01 1996

GROUNDWATER

Dear Mr. Kendrick:

The New Mexico Oil Conservation Division (OCD) has completed a review of Transwestern Pipeline Company's (TPC) December 20, 1995 "WORK PLAN FOR PHASE II SOIL AND GROUND-WATER ASSESSMENT FOR ROSWELL COMPRESSOR STATION NO. 9 SURFACE IMPOUNDMENTS" and November 8, 1995 "PHASE I SOIL AND GROUND-WATER ASSESSMENT FOR ROSWELL COMPRESSOR STATION NO. 9 SURFACE IMPOUNDMENTS". These documents contain the results of TPC's Phase I investigations and TPC's proposed work plan for additional (Phase II) soil and ground water contamination investigations at the Roswell Compressor Station.

The above referenced proposed Phase II work plan is approved with the following conditions:

1. The OCD is concerned about the lack of actual background soil metals concentrations at the site. Actual concentrations will need to be determined either during this phase of the investigation or at a later date.
2. Soil samples from all borings and monitor wells will be taken from the interval with the highest field PID readings and the bottom of the boring. The soils will be sampled and analyzed for aromatic and halogenated volatile organics, semi-volatile organics, polychlorinated biphenyls, New Mexico Water Quality Control Commission (WQCC) metals and total petroleum hydrocarbons using appropriate EPA methods and quality assurance/quality control.

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3. In order to develop a comprehensive ground water quality assessment of the site, TPC will sample ground water from all proposed and pre-existing site monitor wells during the proposed sampling program. Ground water samples from all wells will be sampled for aromatic and halogenated volatile organics, semi-volatile organics, polychlorinated biphenyls, metals, total dissolved solids and cations and anions regulated by the WQCC. All samples will be analyzed using appropriate EPA methods and quality assurance/quality control.
4. All wastes generated will be analyzed for hazardous characteristics, benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons and submitted to the OCD for approval prior to disposal.
5. All boreholes will be properly plugged and abandoned upon completion by grouting the hole to the surface with cement containing 5% bentonite.
6. TPC will submit a report on the investigation to the OCD by November 1, 1996. The report will contain:
 - a. A description of all activities which occurred during the investigation including conclusions and recommendations. The recommendations will include a proposed long term ground water monitoring program.
 - b. Lithologic logs and as built well construction diagrams for each soil boring, monitor well and soil vapor extraction well.
 - c. Summary tables listing all soil laboratory analytic results including copies of the laboratory analyses and quality assurance/quality control data.
 - d. Summary tables listing all past and present laboratory analytic results of all water quality sampling for each monitoring point including copies of the current laboratory analyses and quality assurance/quality control data.
 - e. Soil and ground water isoconcentration maps for contaminants of concern (COC). In addition to the COC's proposed, COC's will include all contaminants which either are in excess of or have the potential to cause an exceedance of WQCC standards.
 - f. A water table elevation map using the water table elevation of the ground water in all monitor wells.

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- g. A product thickness map based on the thickness of free phase product in all monitor wells.
 - h. The recommended disposition of any wastes generated during the investigations.
7. TPC will notify the OCD at least one week in advance of all scheduled activities such that an OCD representative has the opportunity to witness the events and/or split samples.
8. All documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

Please be advised that OCD approval does not relieve TPC of liability if contamination exists which is beyond the scope of the work plan, or if the activities fail to adequately determine the extent of contamination related to TPC's activities. In addition, OCD approval does not relieve TPC of responsibility for compliance with RCRA hazardous waste regulations or any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7154.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia District Office
Mark Weidler, Secretary NMED
Benito Garcia, NMED Hazardous and Radioactive Materials Bureau
George Robinson, Cypress Engineering Services, Inc.