



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

*Stu -
copy to
Serra Michael*

April 17, 1997



CERTIFIED MAIL
RETURN RECEIPT NO: P-410-431-167

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

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

Dear Mr. Kendrick:

The New Mexico Oil Conservation Division (OCD) has completed a review of Transwestern Pipeline Company's (TPC) February 28, 1996 "PHASE III SOIL AND GROUND WATER ASSESSMENT PLAN, ROSWELL COMPRESSOR STATION, TRANSWESTERN PIPELINE COMPANY". This document contains TPC's proposed work plan for additional (Phase III) soil and ground water contamination investigations at the Roswell Compressor Station. The document also contains a long term ground water monitoring plan.

The above referenced proposed Phase III work plan and long term ground water monitoring plan is approved with the following conditions:

1. The closest soil borings for determining background soil metals concentrations will be located a minimum of 50 feet from the external boundaries of former pit #1.
2. The OCD defers comment on TPC's risk-based contaminant closure levels or performance standards. During site investigations, the OCD considers the OCD's "UNLINED SURFACE IMPOUNDMENT CLOSURE GUIDELINES" and the New Mexico Water Quality Control Commission standards to be the screening levels used in contaminant investigations. The OCD will consider appropriate remediation levels and standards for site closure when the contaminant investigations are complete and a remedial action plan is submitted.
3. The OCD defers comment on modifications to long term metals ground water monitoring until actual monitoring data is submitted which supports the recommended changes.

*File: ACWA, 7/27/10
TRACK: TWSP, 4-17-97, 4-21-97, ENRON, OCD, Subject: Investigation, 1 e*

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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. TPC will coordinate the Phase III monitor well sampling to coincide with a quarterly sampling event such that all new and preexisting monitor wells are sampled at the same time.
6. All cement grouts used for monitor well completion or plugging and abandonment of boreholes will contain 3 to 5% bentonite.
7. TPC will submit a report on the Phase III investigations to the OCD by August 29, 1997. The report will contain:
 - a. A description of all activities which occurred during the investigation including conclusions and recommendations. The recommendations will include any necessary modifications to the long term ground water monitoring program.
 - b. Lithologic logs and as built well construction diagrams for each soil boring and monitor 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.
 - 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.

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8. 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.
9. 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.