



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

February 24, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-235-437-236

Mr. Bill Kendrick
ENRON Gas Pipeline Group
P.O. Box 1188
Houston, Texas 77251-1188

**RE: GROUND WATER ASSESSMENT
ROSWELL COMPRESSOR STATION**

Dear Mr. Kendrick:

The New Mexico Oil Conservation Division has reviewed ENRON Gas Pipeline Group's (ENRON) October 14, 1997 "PHASE III SOIL AND GROUND WATER ASSESSMENT REPORT, ROSWELL COMPRESSOR STATION, TRANSWESTERN PIPELINE COMPANY". This document contains the results of ENRON's recent investigations of the extent of contamination related to the ENRON Roswell Compressor Station.

The OCD has the following comments on the above referenced report:

1. Section 3.2, Page 9

The statement that the soil metals concentrations are within background concentrations cannot be evaluated since ENRON to date has not taken any background soil samples.

2. Section 3.3.2, Page 11

- a. The extent of ground water contamination in the vicinity of MW-20 and MW-21 has not been completed.
- b. The extent of halogenated organic compounds is not entirely represented by areas with measurable concentrations of 1,1,1-TCA. Monitor wells MW-20 and MW-13 contain 1,2-DCA in concentrations in excess of New Mexico Water Quality Control Commission (WQCC) standards. These wells are not within the estimated extent of 1,1,1-TCA as shown on figure 6. The estimated extent of halogenated organic compounds needs to include these areas.

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- c. The statement that all metals detected were below WQCC standards is not correct. Monitor well MW-1 contains arsenic and barium in excess of WQCC standards and monitor wells MW-18, MW-20 and MW-22 contain iron in excess of WQCC standards.

3. Section 4, Page 12

This section only lists benzene, toluene, ethylbenzene, xylene, 1,1,1-TCA and 1,1-DCA as primary target compounds. However, ground water at the site also contains naphthalene, 1,2-DCA, 1,1-DCE, arsenic, barium, iron, chloride and total dissolved solids in excess of WQCC standards. These constituents will also need to be addressed in future investigative reports and remedial action plans.

4. It is difficult for the OCD to evaluate vertical water quality impacts with only one deep well since it has not been determined whether monitor well MW-23D is actually downgradient of the upper contaminated zone.

In order to address the OCD's above comments, the OCD requires that ENRON submit a work plan to complete the definition of the lateral and vertical extent of contamination and to determine background metals concentrations at the site. The plan will be submitted to the OCD Santa Fe Office by April 24, 1998 with a copy provided to the OCD Artesia Office. Once all investigative activities have been completed the OCD will require that a final comprehensive site investigation report be compiled and submitted for approval.

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

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: Tim Gum, OCD Artesia Office
Mike Matush, NM State Land Office
George Robinson, Cypress Engineering Services, Inc.
Benito Garcia, NMED Hazardous & Radioactive Materials Bureau