

TWP

ATTACHED

**Baca, Vicky, NMENV**

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**From:** Gabriela Floreslovo <gfloreslovo@earthcon.com>  
**Sent:** Friday, May 30, 2014 1:13 PM  
**To:** Baca, Vicky, NMENV  
**Cc:** Stacy Boultinghouse  
**Subject:** FW: Notification of Construction for System Modifications / Transwestern Compressor Station No. 9, Roswell, NM.  
**Attachments:** 052914-Roswell\_Notification of System Modifications.pdf

Vicky, see attached; per Mr. Cobrain's request, going forward you'll be included in the distribution list of site-related documents/correspondence.

Regards,  
Gabriela P. Floreslovo  
Senior Project Engineer  
EarthCon Consultants, Inc.  
14405 Walters Rd. Suite 700  
Houston, Texas 77014  
**Office:** 281-240 5200 x2721  
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**From:** Gabriela Floreslovo [<mailto:gfloreslovo@earthcon.com>]  
**Sent:** Thursday, May 29, 2014 3:26 PM  
**To:** 'dave.cobrain@state.nm.us'; Jim Griswold ([Jim.Griswold@state.nm.us](mailto:Jim.Griswold@state.nm.us)); 'neelam.dhawan@state.nm.us'; [tim.gum@state.nm.us](mailto:tim.gum@state.nm.us); [king.laurie@epa.gov](mailto:king.laurie@epa.gov)  
**Cc:** Stacy Boultinghouse ([stacy.boultinghouse@energytransfer.com](mailto:stacy.boultinghouse@energytransfer.com)); Richard A. Spell ([richard.spell@energytransfer.com](mailto:richard.spell@energytransfer.com)); Lawrence (Larry) Campbell ([larry.campbell@energytransfer.com](mailto:larry.campbell@energytransfer.com)); JD Haines ([jhaines@earthcon.com](mailto:jhaines@earthcon.com))  
**Subject:** Notification of Construction for System Modifications / Transwestern Compressor Station No. 9, Roswell, NM.

Dear Monsieurs Cobrain, Griswold, Gum, and Madames Dhawan and King:

On behalf of Transwestern Pipeline Company, LLC (Transwestern), please find attached a letter notifying of scheduled construction activities at Transwestern's Compressor Station No.9.

Regards,  
Gabriela P. Floreslovo  
Senior Project Engineer  
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14405 Walters Rd. Suite 700  
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**Office:** 281-240 5200 x2721  
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## Common Comment and Response Worksheet (Version 3)

Date		Surveillance Activity Number						Document Title (version)				Contract/TO Number	
Dec-13		CZTE00482 /AGEISS #497						Working Copy Risk Screening Evaluation for Solid Waste Management Unit (SWMU) 127, Petroleum, Oil, and Lubricants (POL) Wash Pad at Facility 4095, Cannon Air Force Base (AFB), New Mexico. December 2013				FA8903-09-D-8580\0013	
Item	Source	Section	Page	Para	Line	Class	Comment				Response		
1	AGEISS/SLF	NA	2	2	4	S	Reference the version of ProUCL used in the data analysis.				The text will be updated to include the version of ProUCL used (Version 4.1.01)		
2	AGEISS/SLF	NA	2	2	NA	M	Add text to expand the discussion that describes how the 95% UCL EPC was calculated. This EPC was based on 2 detections for benzene (1.4% detection rate), 4 detections for ethylbenzene (2.8% detection rate), and 8 detections for xylenes(5.7% detection rate), from a sample size of 141.				The following text will be added after the 2nd sentence in the 2nd paragraph on page 2: <i>"For the VOCs, the 95% UCLs selected were the value recommended by the ProUCL software, specifically the nonparametric Kaplan-Meier Chebyshev or t-statistic result. For ethylbenzene, two 95% UCLs were initially recommended by ProUCL; however, the percentile bootstrap result was not used because ProUCL recommended that four or more distinct results are needed, and only three were available. "</i>		
3	AGEISS/SLF	NA	2	2	19	M	Clarify whether the ratio of benzene to ethylbenzene as stated here or benzene to toluene as footnoted in Table 4 was used to calculate the benzene detection limit for sample 12709.				The footnote on Table 4 is incorrect and will be corrected as follows: <i>"As the DL for sample 12709 benzene result (7000 U ug/kg) was unusually elevated, benzene was estimated using the fraction of the benzene to ethylbenzene ratio. This fraction was estimated using detected results from sample 12710 (3800/54000. or 0.07). "</i>		
4	AGEISS/SLF	NA	2	3	5	S	Add the clarifier of "low frequency of detection" to this sentence as a rationale for lower risk.				The sentence will be revised as requested.		
5	AGEISS/SLF	NA	3	1	2	S	Add the clarifier of "low frequency of detection" to this sentence as a rationale for lower risk.				The sentence will be revised as requested.		

Column A: Comment Identifier Number  
 Column B: Source (Commenter/Authority)  
 Column C: Section Number of Comment  
 Column D: Page Number of Comment (first page associated with comment)  
 Column E: Paragraph number, on page, of Comment  
 Column F: Line Number (within Paragraph above) of Comment  
 Column G: Comment Classification  
 Column H: Comment  
 Column I: Response  
 Notes: Comments must be actionable ("add the following text:...", "delete...", "change text to:")  
 Place only one comment per row.  
 Classify comment as C, M, S, or A.

Comment Classifications	
<b>(C)</b> Critical:	Critical comments will result in a critical issue. Provide convincing support.
<b>(M)</b> Major:	Major comments are significant concerns that may result in a major issue. This category may be used with a general statement of concern followed by a detailed comment on the specific entries in the document that, considered in total, constitute the concern.
<b>(S)</b> Substantive:	An entry in the document that appears to be or is potentially unnecessary, misleading, incorrect, or confusing.
<b>(A)</b> Administrative:	Administrative comments correct inconsistencies between different sections, typographical and grammatical errors.



TRANSWESTERN PIPELINE COMPANY  
An ENERGY TRANSFER Company

May 29, 2014

via electronic mail

Bureau Chief, c/o Mr. Dave Cobrain  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303

RE: Notice of Construction Activities  
Transwestern Roswell Compressor Station No. 9  
Transwestern Pipeline Company, LLC  
Roswell, Chavez County, New Mexico  
NMED 1656; NMOCD Case # GW-052  
EPA ID No. NMD986676955

Dear Mr. Cobrain:

Transwestern Pipeline Company, LLC (Transwestern), in accordance with *Provision III.J. Entry and Inspection* of the March 2013 Stipulated Order for Transwestern's Compressor Station No. 9 (Site), is hereby providing this letter to notify the New Mexico Environment Department (NMED) of the construction activities described below. These construction activities are scheduled to commence the week of June 30, 2014, and are associated with system modifications proposed in the April 2013 *Amended Investigative Work Plan* and May 2013 *Amended Remediation Work Plan* for the Site, and specifically address the plugging and abandonment of six Multi-Phase Extraction (MPE) wells (MPE-1 through MPE-6), and the installation of four new MPEs (MPE-38 through MPE-41).

Construction activities will include:

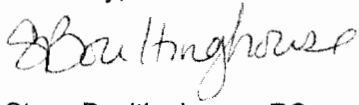
- Abandon and remove underground piping for former MPE-1 through MPE-6;
- Dismantle manifold headers for former MPE-1 through MPE-6;
- Install vapor extraction, air, and fluid discharge lines to connect MPE-38 through MPE-41;
- Install leak detector tape for new lines to MPE-38 through MPE-41;
- Install manifold headers for MPE-38 through MPE-41; and,
- Back fill excavations to original grade.

If you have any questions regarding the content of this letter, please contact me at (281) 740-0494 or Gabriela Floreslovo (EarthCon Consultants, Inc.) at (281) 240-5200.

Mr. Cobrain  
Notice of No Changes to the O&M and Monitoring Plans  
Transwestern Compressor Station No. 9  
Transwestern Pipeline Company, LLC

May 29, 2013  
Page 2 of 2

Sincerely,



Stacy Boultinghouse, PG<sub>(Texas 4889)</sub>  
Environmental Specialist  
Transwestern Pipeline Company, LLC  
Stacy.Boultinghouse@energytransfer.com

ec: Neelam Dhawan, Hazardous Waste Bureau, New Mexico Environment Department  
Jim Griswold, New Mexico Oil Conservation Division (Santa Fe)  
Tim Gum, Environmental Bureau, New Mexico Oil Conservation Division (Artesia)  
Laurie King, US Environmental Protection Agency - Region 6  
Richard Spell - Transwestern Pipeline Company (Houston, TX)  
Larry Campbell - Transwestern Pipeline Company (Roswell, NM)  
Gabriela Floreslovo - EarthCon Consultants, Inc.