

TWP



Baca, Vicky, NMENV

From: Gabriela Floreslovo <gfloreslovo@earthcon.com>
Sent: Friday, June 20, 2014 3:50 PM
To: Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV; Baca, Vicky, NMENV; Griswold, Jim, EMNRD; Gum, Tim, EMNRD; siked@sls.state.nm.us; king.laurie@epa.gov
Cc: Stacy Boultinghouse; Richard A. Spell; Lawrence (Larry) Campbell; JD Haines
Subject: Revised Recovery System Operation & Restart Notification / Transwestern Compressor Station No. 9, Roswell, NM.
Attachments: Transwestern Compressor Station No.9_Revised Groundwater Recovery System Operation-062014.pdf

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

On behalf of Transwestern Pipeline Company, LLC (Transwestern), please find attached a letter describing a Revised Groundwater and Phase-Separated Hydrocarbon (PSH) Recovery System Operation plan for Transwestern's Compressor Station No.9, and notifying of system restart for 2014.

Regards,
Gabriela P. Floreslovo
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TRANSWESTERN PIPELINE COMPANY
An ENERGY TRANSFER Company

June 20, 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: Revised Groundwater/PSH Recovery System Operation
and 2014 System Re-Start
Transwestern 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), is hereby providing a revised operation schedule for the groundwater and phase-separated hydrocarbon (PSH) recovery system installed at Transwestern's Compressor Station No. 9 located in Roswell, New Mexico (Roswell Compressor Station; Site).

The groundwater/PSH recovery system installed at the Roswell Compressor Station had been typically operated each year from late-April or early-May through mid-November to prevent pipe breakage associated with freezing temperatures. During our meeting November 21, 2013, the possibility of running the referenced system year-round was discussed. Transwestern has evaluated the factors involved in running the system during the colder months of the year, and concluded that the limiting factor to year-round operation is the freezing effect of cold and wind speed over the nozzles of the irrigation sprinklers during the winter months. Therefore, the system cannot be operated year-round. However, Transwestern does plan to attempt extending the operational period of the groundwater/PSH recovery system from the beginning of March through the end of November by increasing system oversight during March, April and November. Potential short-duration shutdown episodes may still occur at the beginning or end of the proposed running period, based on extreme weather forecasts.

As you are aware, operation of the groundwater/PSH recovery system was halted in July 2013, when Transwestern was informed by the New Mexico Office of the State Engineer


Mr. Cobrain
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(OSE) that additional water rights needed to be acquired in order to operate the system as proposed to be expanded in the May 2013 *Amended Remediation Work Plan*. Transwestern is glad to inform you that this issue has been resolved to the OSE's satisfaction and recovery system re-start will commence in the next few weeks (in phases).

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

Sincerely,



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

ec: Neelam Dhawan, Hazardous Waste Bureau, New Mexico Environment Department
Vicky Baca, Hazardous Waste Bureau, New Mexico Environment Department
Jim Griswold, Environmental Bureau, New Mexico Oil Conservation Division
Tim Gum, Environmental Bureau, New Mexico Oil Conservation Division (Artesia)
Steven Ikeda, New Mexico State Land Office
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.