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RYAN FLYNN
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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 24, 2014

Richard A. Spell
Waste, Water, & Remediation Manager
Transwestern Pipeline, LLC
711 Louisiana, Suite 900
Houston, TX 77002

**RE: APPROVAL
REPORT OF 2013 GROUNDWATER REMEDIATION ACTIVITIES
TRANSWESTERN COMPRESSOR STATION NO. 9
TRANSWESTERN PIPELINE COMPANY, LLC
ROSWELL, CHAVEZ COUNTY, NEW MEXICO
EPA ID# NMD986676955
HWB-TWP-14-002**

Dear Mr. Spell:

The New Mexico Environment Department (NMED) has reviewed the *Report of 2013 Groundwater Remediation Activities, Transwestern Compressor Station No. 9*, (Report) dated March 11, 2014 for Transwestern Pipeline Company, LLC. NMED hereby approves this Report with the following comment:

Comment 1.

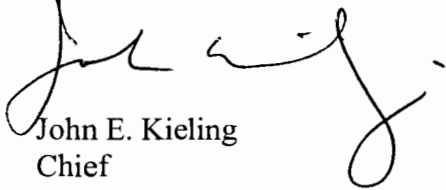
In Section 5.0 Recovery System Monitoring, page 7, the Permittee states “[m]onthly air samples are collected from the influent stream to the Baker Furnaces were analyzed for total petroleum hydrocarbons (TPH) in the gasoline range organics (GRO) via EPA method 8015D.” The Stipulated Final Order on page 49 Section VII.A.8. *Subsurface Vapor-phase Monitoring and Sampling* states the following, “[v]apor samples analyzed by the laboratory for percent moisture and VOCs shall be collected using SUMMA canisters or other sample collection method approved by the Department. The samples shall be analyzed for VOC concentrations by EPA

R. Spell
June 24, 2014
Page 2

method TO-15, as it may be up-dated, or equivalent VOC analytical method.” NMED contacted Hall Environmental Analytical Laboratory (HEAL) and was informed that they are not accredited for analysis of air. Either HEAL should demonstrate proficiency using the SW-846 Method 8015D for air samples or provide documentation that they are currently accredited for EPA method 8015D in air. Provide the necessary information in the next remediation activity Report.

If you have any questions regarding this letter, please contact Vicky Baca at (505) 476-6059.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED, HWB
N. Dhawan, NMED HWB
S. Boultinghouse, ETC
L. King, EPA-6PD-N

File: TWP 2014 and Reading
TWP-14-002