



TRANSWESTERN PIPELINE COMPANY
An ENERGY TRANSFER Company

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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

NMED
Hazardous Waste Bureau

RE: Response to June 24, 2014 Letter
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:

On September 10, 2014, Transwestern Pipeline Company, LLC (Transwestern) received an electronic copy of your June 24, 2014 letter providing approval to the March 11, 2014 *Report of 2013 Groundwater Remediation Activities* for Transwestern's Compressor Station No. 9 located in Roswell, New Mexico (Roswell Compressor Station; Site). It was noticed that the letter bears Transwestern's former address at 711 Louisiana Street, which may explain why the hard copy was not received. Please use Transwestern's current address as shown in the footer of this letter for future communications.

The letter also comments on the use of EPA method 8015D to analyze for total petroleum hydrocarbons (TPH) in the gasoline range organics (GRO) in monthly air samples from the influent stream to the Baker Furnaces, by a laboratory that is not accredited for analysis of air. Section VII.A.8. of the Stipulated Final Order is quoted as it identifies the use of EPA method TO-15 for analysis of volatile organic compounds for vapor-phase monitoring in soil.


Transwestern has previously discussed with Ms. Vicky Baca of the New Mexico Environment Department (NMED) that the use of EPA method 8015D is common practice when results are used as a gross indicator of system efficiency, as is the case for this project; however, Transwestern understands that NMED is concerned about the general use of analytical results that may lack appropriate supporting quality control.

In attention to NMED's comment, Transwestern plans to use EPA method TO-15 to analyze future air samples from the influent stream to the Baker Furnaces, requesting the laboratory to report the results as a total TPH value for comparison with existing system data.

Transwestern plans to use summa canisters to collect these samples; however, if constituent concentrations are high and result in the laboratory not being able to properly clean the summa canisters for reuse, then the use of Tedlar bags for sample collection will be considered.

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,



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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
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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.