



TRANSWESTERN PIPELINE COMPANY
An ENERGY TRANSFER Company



ENTERED



June 5, 2017

Mr. John E. Kieling, Bureau Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505-6303

RE: Response to Comments on 2016 Groundwater Remediation Activities Report
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. Kieling:

In a letter dated April 28, 2017, New Mexico Environmental Department (NMED) provided comments regarding the *Report of 2016 Groundwater Remediation Activities* for the Transwestern Compressor Station No. 9 facility located in Roswell, New Mexico. Provided below are the NMED comments in **bold** along with Transwestern's responses in plain text.

Comment No. 1: Refer to Section IV.A of Stipulated Final Order when proposing changes to the existing Operations and Maintenance (O&M) and Monitoring Plan. The order states "[a]t the minimum the monitoring must be conducted semiannually." Updates to the plan shall be included in a revised O&M and Monitoring Plan. The revised plan must be submitted no later than May 31 of each year.

Response: A *Revised O&M and Monitoring Plan* was submitted to the NMED on May 26, 2017.

Comment #2: The respondent proposes continuation of the system optimization effort. NMED concurs with the proposal. In future submittals, provide the supporting data regarding the study and the modifications made to the system, if any.

Response: Comment noted, with additional explanation provided in the *Revised O&M and Monitoring Plan* submitted on May 26th.

Comment #3: Table 4-5 (Summary of Groundwater Analytical Results for Samples Below PSH) discussed in Section 4.0, page 7, is missing from the Report. Provide Table 4-5 for inclusion in the Report.

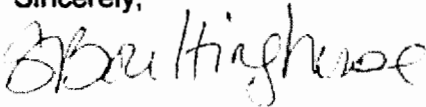
Response: Table 4-5 is attached to be included in the *Report of 2016 Groundwater Remediation Activities*.

Comment #4: Section 6.0, page 10, contains a typographical error. The Respondent states "BTEX was in monitoring wells MW-29, MW-32, MW-35, and MW-37..." Table 4-4 indicates otherwise. Correct the error in future reports.

Response: Comment noted, with the error to be corrected in future reports.

If you have any questions or comments, please contact me at (281) 740-0494 or Rachel Andrews (EarthCon Consultants, Inc.) at (770) 973-2100.

Sincerely,



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ec: Kristen Van Horn, Hazardous Waste Bureau, New Mexico Environment Department
Brad Billings, Environmental Bureau, New Mexico Oil Conservation Division
New Mexico Oil Conservation Division (Artesia)
New Mexico State Land Office
Laurie King, US Environmental Protection Agency - Region 6
Larry Campbell - Transwestern Pipeline Company (Roswell, NM)
Rachel Andrews - EarthCon Consultants, Inc.
JD Haines - EarthCon Consultants, Inc.

**Table 4-5. Summary of Groundwater Analytical Results
for Samples Below PSH
Transwestern Compressor Station No. 9 - Roswell, NM**

Well	Sampling Date	Benzene	Toluene	Ethylbenzene	Xylenes (total)
NMWQCC Standard:		10	750	750	620
USEPA MCL:		5	1,000	700	10,000
MW-16	05/05/16	94	< 10	120	2,300
	11/16/16	90	< 20	46	1,700
MPE-31	05/05/16	140	16	250	400
MPE-39	11/17/16	160	130	< 20	160

Notes:

- 1) Results reported above the applicable regulatory standard are shown in bold type
- 2) Results reported in micrograms per liter ($\mu\text{g/L}$)
- 3) NMWQCC - New Mexico Water Quality Control Commission Standard
- 4) USEPA MCL - United States Environmental Protection Agency Maximum Concentration Limit
- 5) PSH - Phase separated hydrocarbons
- 6) PSH was not present in MPE-39 and MPE-31 during the May and November 2016 sampling events, respectively. The results from those sampling events are presented on Table 4-4.

Prepared by: RLA 5/23/17

Checked by: SSD 5/23/17