

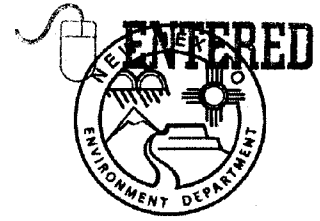


State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030
www.env.nm.gov

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Governor
JOHN A. SANCHEZ
Lieutenant Governor



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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

November 6, 2017

Ms. Stacy Boultinghouse, PG
Environmental Manager
Transwestern Pipeline Company, LLC
1300 Main Street
Houston, TX 77002

**RE: APPROVAL WITH MODIFICATIONS
RESPONSE TO COMMENTS, REVISED OPERATION, MAINTENANCE &
MONITORING PLAN
ROSWELL COMPRESSOR STATION NO.9
TRANSWESTERN PIPELINE COMPANY, LLC
ROSWELL, CHAVES COUNTY, NEW MEXICO
NMOCD CASE #GW-052/EPA ID NO. NMD986676955
HWB-TWP-17-002**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Response to Comments, Revised Operation and Maintenance and Monitoring Plan, Roswell Compressor Station No.9* (Response Letter), dated October 19, 2017 submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED reviewed the Response Letter and hereby issues this *Approval with Modifications*. The Respondent must address the following comments provided by both NMED and the New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division (OCD):

Comment 1

The Respondent submitted one hard copy and an electronic copy of the Response Letter on October 19, 2017; however, the Respondent was required to submit two hard copies of the revised Plan. The Respondent must submit two hard copies and an electronic copy with a red-line strikeout version of the revised Plan as well as a response letter in accordance with the Section IX.A. of the Order and NMED's Disapproval letter, dated June 26, 2017. The Respondent included a red-line strikeout version of the revised Plan as an attachment in the Response Letter; however, it does not substitute submission of the two hard copies of the revised Plan itself. No revisions to the Response Letter are necessary at this time; however, the Respondent must submit an additional hard copy of the Response Letter to NMED with the submittal required by this letter.

Comment 2

In the Respondent's response to Comment 2 of NMED's *Disapproval*, the Respondent states, "[t]he total air flow rate for the SVE system is approximately 400 scfm at 135"H₂O," and "[b]ased on the calculations, the average total friction loss of the SVE system was estimated to be approximately 51"H₂O." The capacity of the blowers appears to be sufficient to operate the soil vapor extraction system according to the Respondent's calculation; however, several input values in Attachment C, *Line Loss Calculations*, appear to be incorrect and need to be revised. For example, the length of straight pipe from a well in Circuit A to the manifold is estimated as 200 feet (ft.) in the calculation; however, the distance from the equipment compound to any Circuit A well appears to be at least 1,500 ft. according to Figure 1-3, *Remediation System Layout in the Report of 2016 Groundwater Remediation Activities*, dated March 17, 2017. Revise these input values to represent actual scale of the site and recalculate the friction loss. In addition, the distances from the manifold to the knockout drum vary from 75 to 700 ft. depending on the Circuits. It is not clear why these distances vary significantly among the Circuits; provide an explanation to the variances. Submit a revised Attachment C to address the discrepancies.

Comment 3

In Attachment C, *Line Loss Calculations*, the Respondent states, "[t]he calculations presented here is the use of the Darcy equation, which is commonly used to calculate the frictional energy loss for incompressible fluids and compressed gases." Air is a compressible fluid and the air in soil vapor extraction system is not a compressed gas. Clarify whether the statement contains typographical error; otherwise, ensure that the Respondent uses appropriate equations for calculations and revise Attachment C, accordingly.

Comment 4

In the Respondent's response to Comment 6 of NMED's *Disapproval*, the Respondent proposes the following changes in the sampling and analysis plan:

1. Change from semiannual to annual sampling at MW-32, MW-35 and MW-37.

2. Change from semiannual monitoring at MW-16 and annual monitoring at MW-21 to annual monitoring at MW-16 and semiannual monitoring at MW-21.
 3. Change to semiannual sampling at MW-22 from annual sampling, but continue annual sampling at MW-20, MW-39, MW-40, MW-41 and MW-42.
 4. Continue sampling groundwater under the phase separated hydrocarbons (PSH) on an as-needed basis from the multiphase extraction (MPE) wells.
- The first proposed changes for MW-32, MW-35 and MW-37 were approved in NMED's *Disapproval*, dated June 26, 2017.
 - The second proposed change for MW-21 (from annual to semiannual sampling) is approved; however, the proposed change for MW-16 (from semiannual to annual sampling) is not approved. MW-16 is located within Circuit C; thus, MW-16 is critical for performance evaluation. MW-16 must be sampled for BTEX semiannually.
 - The third proposed change needs a clarification: the proposed change for MW-22 (from annual to semiannual sampling) contradicts the proposed change (from semiannual to annual sampling) in Attachment D, Table 4.2-1, *Revised Sampling and Analysis Plan*. MW-22 is located on the boundary of Circuit D; thus, MW-22 is essential for performance evaluation. MW-22 must be sampled for VOCs semiannually. It should be noted that both BTEX and VOCs are analyzed by the same analytical method, EPA Method 8260; thus, BTEX is reported regardless, if EPA Method 8260 is used. All detected volatile organic compounds must be reported in future monitoring reports.
 - All Wells MW-20, MW-39, MW-40, MW-41 and MW-42 are proposed for annual sampling although current and proposed sampling frequencies in Table 4.2-1 depict semiannual sampling. Clarify whether the statement contains a typographical error. Wells MW-20, MW-39, MW-40, MW-41 and MW-42 must be sampled semiannually.
 - The fourth proposed change has been implemented by the Respondent and NMED approves of the proposed change. The following table depicts the approved changes in the sampling and analysis plan; the Respondent must conduct future sampling events according to the table below:

Well ID	1 st Semiannual Event Analytical Requirements	2 nd Semiannual Event Analytical Requirements
MW-13	---	BTEX
MW-14	---	BTEX
MW-16	BTEX	BTEX
MW-20	VOCs	VOCs
MW-21	BTEX	BTEX

MW-22	VOCs	VOCs
MW-24D	---	BTEX
MW-26	VOCs	VOCs
MW-27	BTEX	BTEX
MW-29	BTEX	BTEX
MW-32	---	BTEX
MW-34	BTEX	BTEX
MW-35	---	BTEX
MW-37	---	BTEX
MW-39	VOCs	VOCs
MW-40	VOCs	VOCs
MW-41	VOCs	VOCs
MW-42	VOCs	VOCs

Revise the sampling and analytical plan accordingly in all future reports and plans.

The Respondent must address all comments contained in this *Approval with Modifications* in all future reports and plans. An additional hard copy of the Response Letter and the revised Attachment C addressing Comments 2 and 3 must be submitted to NMED no later than **January 30, 2018**.

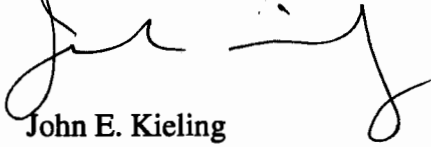
Ms. Boultinghouse

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If you have questions regarding this *Approval with Modifications*, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,



John E. Kieling

Chief

Hazardous Waste Bureau

cc: D. Cobrain NMED HWB
K. Van Horn NMED HWB
M. Suzuki NMED HWB
J. Griswold, NMOCD
B. Billings, NMOCD
T. Gum, NMOCD
L. King, USEPA, Region 6

File: TWP 17-002 and Reading, 2017
NMOCD Administration Record, AP-125