

State of New Mexico
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 17, 2018

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS COMMENTS
2017 ANNUAL REPORT
ROSWELL COMPRESSOR STATION NO.9
TRANSWESTERN PIPELINE COMPANY
ROSWELL, CHAVES COUNTY, NEW MEXICO
EPA ID NMD986676955
NMOCD #GW-052
HWB-TWP-18-001**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Comments 2017 Annual Report, Roswell Compressor Station No.9* (Response Letter), dated July 26, 2018 submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED reviewed the Response Letter. The Respondent must address the following comments.

Comment 1

The referenced task/invoice number (HWB-TWP-17-002) is incorrect in the letter title. The appropriate task/invoice number for this correspondence is HWB-TWP-18-001. Use the appropriate task/invoice number for future correspondence. In addition, the Response Letter is titled as the Response to Approval Letter Comments. NMED issued an approval with modifications, rather than an approval. Reference the letter accurately in future correspondence. No revision is necessary to this Response Letter.

Comment 2

The response to Comment 2 of NMED's *Approval with Modifications*, dated May 1, 2018, states, "[t]he aboveground storage tanks are not subject to the Stipulated Final Order (SFO) issued by NMED in March 2013." The entire Facility, as defined in Order Section II.A.3, is subject to the release reporting and assessment requirements of the Order. The Respondent states, "[t]hese tanks serve to store natural gas condensate produced by pipeline maintenance activities which is delivered by piping from other operating equipment at the Facility." Since the tanks may contain hazardous waste or contaminants as defined in Order Section III.B, the Respondent must report any release to NMED within 15 days after discovery in accordance with Order Section V.A. No response is necessary.

Comment 3

The replacement pages included in Attachment A are not fully revised to reflect the changes required by Comment 6 of NMED's *Approval with Modifications*. There are discrepancies in the number of wells in Circuit C and Circuit D between Figure 1-3 and the text in the replacement pages. Provide replacement pages that address the revisions required by Comment 6. In addition, the Response Letter states that well MPE-21 was not included in the SVE optimization test; however, well MPE-21 appears to be included in Circuit B according to Figure 1-3. Revise Figure 1-3 to depict an accurate configuration of the remediation system. Furthermore, the note in Figure 1-3 states, "Circuit E consists of 9 shallow SVE wells that are located within Circuit C and D." No discussion was provided regarding Circuit E in the 2017 Report. Provide information about Circuit E in the response letter.

Comment 4

The response to Comment 7 of NMED's *Approval with Modifications*, states, "[t]he available evidence from the Site indicates the potential for short-circuiting in these wells due to the length of the well screens compared to the depth of the nearby pipelines." Provide a table showing the depths of the pipelines, depths of the screened intervals of relevant wells, and lateral distances from the pipelines to the wells in the response letter. In addition, provide a discussion to justify the statement using information provided in the table.

Comment 5

The response to Comment 9 of NMED's *Approval with Modifications*, states, "[t]he soil vapor extraction and groundwater extraction technologies at the site can operate independently. Therefore, the groundwater plume is still controlled by pumping activities while vacuum extraction is isolated between Circuits to optimize mass removal rates." While the groundwater extraction addresses expansion of the groundwater plume, potential expansion of the vapor plume is not addressed. If the Respondent proposes to operate only Circuit D for optimal recovery, vapor plumes must also be addressed. NMED generally concurs with the optimization approach; however, the current configuration of the remediation system (operation of all circuits) must be maintained unless the Respondent demonstrates that the vapor plumes will not expand. An additional blower appears to address the "lack of power condition" and may resolve the issue.

Comment 6

The response to Comment 13 of NMED's *Approval with Modifications*, states, "RW-1 is a sentinel well reportedly installed to the top of a finer-grained unit within the subsurface materials that allows for perched groundwater above the more regional water table." It appears that two separate aquifers (perched and regional aquifers) are present at the site. The extent of contamination in the perched aquifer must also be investigated. The Respondent must include 2 rounds of VOC analysis for all wells installed in the perched aquifer (RW-1 and SVE wells, where applicable). Include VOC analysis in the next update of the O&M and monitoring plan due by May 31, 2019.

Comment 7

The response to Comment 14 of NMED's *Approval with Modifications*, states, "[a]nomalies in groundwater elevations not used for contouring considers well construction (deep well versus shallow well), potential field data collection errors, or potential top of casing elevation surveying errors. Further evaluation will be performed to identify proposed measures to eliminate, reduce or explain future occurrences in future Annual Reports." Provide more specific measures to address Comment 14 in the response letter. If wells are installed in separate aquifers (e.g., deep versus shallow), propose to prepare each groundwater surface elevation map separately. If there are errors in survey data, propose to re-survey all existing wells at the site. If a re-survey was conducted, provide a table listing the original and re-surveyed elevations in future reports.

Ms. Boultinghouse

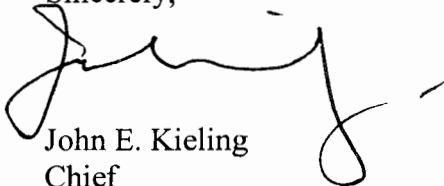
August 17, 2018

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The Respondent must address all comments contained in this letter. The response letter and replacement pages must be submitted to NMED no later than **November 30, 2018**.

If you have questions regarding this letter, 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-18-001 and Reading, 2018
NMOCD Administration Record, GW-052/AP-125