



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**



**ENTERED**



**Hazardous Waste Bureau**

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**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

March 22, 2019

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

**RE: THIRD RESPONSE TO 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 received the *Third Response to Comments 2017 Annual Report, Roswell Compressor Station No.9* (Response Letter), dated February 28, 2019 submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED has reviewed the Response Letter. The Respondent must address the following comments.

**Comment 1**

The response to NMED’s Comment 1 provides rationale for the short-circuiting in the vicinity of Circuit A. Comment 4 in NMED’s *Response to Approval with Modifications Comments 2017 Annual Report*, dated August 17, 2018, required the Respondent to provide a table showing the depth of the pipelines, depth of the screened intervals of relevant wells, and lateral distances from the pipelines to the wells. If the depth of the pipelines is set shallower relative to the depths of the screened intervals of relevant wells, the pipelines would unlikely cause short-circuiting

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and the detailed rationale provided in the response letter would not be necessary. If the Respondent had followed NMED's direction, the preparation of multiple response letters and the detailed rationale may not have been required. If clarification regarding the meaning of NMED's comments is required in the future, submit a clarification question via email and NMED will provide a response in a timely manner. Even though the Respondent provided the rationale for the short-circuiting, the location and depth of the pipelines must be verified. Therefore, the table required by Comment 4 must be submitted to NMED no later than **April 12, 2019**.

### **Comment 2**

The response to NMED's Comment 4 also states, "remedial efforts in the Project Area will be implemented in a continuous improvement approach designed to optimize the removal of PSH to the extent practicable," and "[b]alancing of the system will be necessary on an intermittent basis to optimize the effectiveness of the system. Balancing the system will include flow adjustments to maintain the desired vapor flow gradients, optimize VOC removal rates, or stay within the design flow rates for the vapor treatment systems." The continuous improvement approach (optimization) is permitted when the proposed optimization does not potentially degrade current site conditions. More specifically, optimization associated with flow adjustments may be conducted without the concurrence of NMED and the description and results of these optimization may be included in the subsequent annual report. However, optimization that includes a pilot study (e.g., isolating circuits) may potentially degrade current site conditions; therefore, the Respondent must submit a separate work plan or updated annual O&M plan for NMED's review and approval prior to implementation. No response is required.

### **Comment 3**

Multiple correspondence were issued with regard to the *2017 Annual Report*. NMED received a concern and suggestion from the Respondent to reduce written communication (e.g., comment letters). However, verbal communication does not adequately track the decision-making process for the administrative record. The purpose of the administrative record is to document all information provided to NMED in order for NMED to make decisions regarding contamination and cleanup at the facility. No response is required.

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The Respondent must address all comments contained in this letter. The table required by Comment 1 must be submitted to NMED no later than **April 12, 2019**.

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

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and "K".

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, 2019  
NMOCD Administration Record, GW-052/AP-125