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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

September 20, 2019

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS COMMENTS
REVISED OPERATION, MAINTENANCE, AND MONITORING PLAN
ROSWELL COMPRESSOR STATION NO.9
TRANSWESTERN PIPELINE COMPANY
ROSWELL, CHAVES COUNTY, NEW MEXICO
EPA ID NMD986676955
HWB-TWP-19-002**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Comments Operation, Maintenance, and Monitoring Plan* (Response), dated August 28, 2019 submitted by Transwestern Pipeline Company, LLC (the Respondent). The Respondent must address the following comment.

Comment 1

The Respondent's response to NMED's *Approval with Modifications Comment 4* states, "[t]reated water is discharged by the irrigation system to the west of MW-15 and MW-17, approximately 200 feet from the eastern edge of the Site. Attachment B includes a map indicating the location and design of the irrigation system, as well as an aerial image of the irrigation area." The map included in Attachment B (Irrigation System Map and Aerial Image) depicts the location of the irrigation system southeast of MW-15 and northeast of MW-17

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rather than to the west, as stated. Assuming the location of the irrigation system depicted on the map included in Attachment B is correct, the location of the irrigation system and the area where the highest groundwater surface elevation level was observed appear to coincide. The Respondent's *Response to NMED Approval with Modifications Correspondence Report of 2018 Groundwater Remediation Activities*, dated May 30, 2019 states, "[h]istoric documents (including a 1995 Phase II and a 1997 Phase III, conducted prior to the system's operation) indicated that the groundwater flow direction was complex, and a divide was apparent. Based on the location of the sprayfield and historical information, the divide or groundwater mounding does not appear to be a result of the irrigation activity." It appears that the Respondent's statement regarding the irrigation water may not accurately reflect site conditions. Since the complexity of the site subsurface conditions are not well understood, it is not appropriate to eliminate the possibility of the discharge affecting groundwater levels.

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
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File: TWP-19-002 and Reading, 2019
NMOCD Administration Record, AP-125