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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

FEB 21 2020

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

**RE: APPROVAL WITH MODIFICATIONS
LABORATORY RESULTS SUBMITTAL FOR SVE AND RW-1 WELLS
ADDITIONAL LABORATORY RESULTS SUBMITTAL FOR SVE AND RW-1 WELLS
ACTIVITIES ROSWELL COMPRESSOR STATION NO.9
TRANSWESTERN PIPELINE COMPANY
ROSWELL, CHAVES COUNTY, NEW MEXICO
EPA ID NMD986676955
HWB-TWP-19-003**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Laboratory Results Submittal for SVE and RW-1 Wells* (Report 1), dated December 19, 2019, and *Additional Laboratory Results Submittal for SVE and RW-1 Wells* (Report 2), dated January 30, 2020, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues this Approval with Modifications.

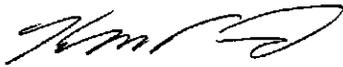
The Respondent must address all comments in the Attachment below and submit a response letter, a table required by Comment 2, and a copy of the field notes required by Comments 1 and 2 no later than **April 30, 2020**. The investigation report required by Comment 4 must be submitted no later than **September 30, 2020**.

Ms. Boultinghouse
SVE/RW-1 Wells Laboratory Results
Page 2

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

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

Sincerely,



Kevin Pierard
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
B. Billings, NMOCD
M. Bratcher, NMOCD
L. King, EPA Region 6 (6LCRRC)

File: TWP-19-003 and Reading, 2020
NMOCD Administration Record, AP-125

0005 1 8 007

Attachment

(Comments)

Comment 1

Report 1, page 1 of 2, states, “[d]uring the June 2019 sampling event, nine of the twelve SVE wells were observed dry or did not have sufficient groundwater to collect representative samples. Wells SVE-28, SVE-30 and RW-1 had sufficient recharge of groundwater...” According to Attachment C included in Report 1, *Historical Groundwater Gauging Data for SVE and MPE Wells*, depths to phase separated hydrocarbons (PSH) and groundwater (DTW) in well SVE-22 gauged in June 24, 2019 are recorded as 32.74 and 32.75 feet below TOC, respectively. According to this data, well SVE-22 initially had a sufficient volume of water for sampling. It is not clear whether well SVE-22 was not sampled due to slow recharge or because of the presence of PSH. Explain why a sample was not collected from SVE-22 in a response letter. Additionally, the Respondent did not include a copy of the field notes for purging and sampling; therefore, NMED cannot evaluate recharge conditions. Provide a copy of the field notes. Furthermore, wells SVE-23 and SVE-27 were not gauged in June 2019 because “snake hazard” existed in the vaults according to Attachment C. A sufficient groundwater/PSH may be present in wells SVE-23 and SVE-27 based on the historical data. A “snake hazard” did not previously exist in any well at the Facility. Resolve the issue (e.g., remove the snake) and collect the required data from these wells.

Comment 2

Report 2, page 1 of 2, states, “[d]uring the January 2019 [sic] sampling event, nine of the twelve SVE wells were observed dry or did not have sufficient groundwater to collect representative samples. Wells SVE-28, SVE-30 and RW-1 had sufficient recharge of groundwater...” Attachment C included in Report 1 that presents groundwater gauging data was not included in Report 2. The Permittee must provide a table that includes the January 2020 gauging data and a copy of the field notes for the January 2020 well purging and sampling.

Comment 3

Report 1, page 2 of 2, states, “[t]herefore, it is possible that residual water observed in the SVE wells may be associated with condensation buildup. Considering the lack of recharge, historical boring logs, and historical observations, field evaluations will be performed in 2020 to investigate the water in the SVE wells and RW-1.” Similarly, the Report 2, page 1 of 2, states, “it is suspected that residual water observed in the SVE wells and RW-1 may be associated with condensation buildup. Field evaluations will be performed in 2020 to further investigate the water in the SVE wells and RW-1.” PSH has been observed in the perched zone (e.g., 3.15 feet in SVE-23 in November 6, 2018) and the condensation buildup alone does not explain the presence of PSH in the perched zone. Discuss potential sources of PSH and groundwater in the perched zone in the response letter.

Comment 4

Report 1, page 2 of 2, and Report 2, pages 1 of 2 and 2 of 2, state, “[t]he field evaluation would involve temporarily disconnecting or plugging recovery lines to the wells to eliminate the potential of rainwater entering through the recovery line. Subsequently, water in the wells will be removed and transferred to the existing remediation system for treatment. Once removed from each well, recharge of water, if any, will be monitored. Based on the results of the field evaluation, future recommendations will by [sic] provided to NMED and NMOCD.” Table 1, *Summary of Groundwater Analytical Results* in Reports 1 and 2, indicates that the contaminant concentrations in the groundwater samples collected from wells SVE-30 and RW-1 exceeded the applicable screening levels. Additionally, PSH has been present in the perched zone. The Respondent may conduct the referenced investigation without a submission of a work plan. However, the results of the investigation and the conclusions and recommendations must be submitted to NMED no later than **September 30, 2020**.