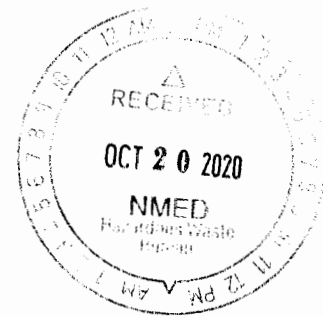




TRANSWESTERN PIPELINE COMPANY
An ENERGY TRANSFER Company



ENTERED



October 14, 2020

Mr. Kevin Pierard
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505

**RE: Response to Approval with Modifications Comments
Operation, Maintenance & Monitoring Plan**
Roswell Compressor Station No. 9
Transwestern Pipeline Company
Roswell, Chaves County, New Mexico
NMOCD Abatement Plan #AP-125 (Formerly #GW-052)
EPA ID No. NMD986676955
HWB-TWP-20-002

Dear Mr. Pierard;

Transwestern Pipeline, LLC (Transwestern) is pleased to submit this *Response to Comments* (RTC) pertaining to the July 2, 2020 Letter issued by the New Mexico Environment Department (NMED). These comments were developed by NMED pertaining to an *Operation, Maintenance and Monitoring Plan* (OM&M Plan) submitted by Transwestern on May 28, 2020.

To respond specifically to each of the Agencies comments, the original comment included within the NMED letter is in **bold**, with the Transwestern response included in plain text immediately following the item requiring a response.

Comment 1

Although the Respondent appropriately submitted two hard copies and an electronic copy in accordance with Order Section IX.A, the hard copies of the Report were not bound. Previously, the Respondent submitted bound copies of the annual reports for NMED's review. Submittals must be provided as bound copies in the future.

Due to circumstances associated with COVID (2020), the availability to conduct business and allow the opportunity to bind copies was limited. Comment noted.

Comment 2

Section 4.2, Groundwater Monitoring, page 10, Table 4.2-1, Groundwater Sampling and Analysis Plan (SAP) must incorporate the following directions in a revised Plan:

a) According to the Report of 2019 Groundwater Remediation Activities, dated May 2020, the benzene concentrations in groundwater samples collected from wells SVE-30 and RW-

1 exceeded the applicable screening level during the January 2020 sampling event. Groundwater samples must continue to be collected from wells SVE-30 and RW-1 for VOC analysis. Revise the SAP accordingly.

b) According to the May 2020 Report of 2019 Groundwater Remediation Activities, chlorinated solvents were detected in groundwater samples collected from wells SVE- 28, SVE-30, and RW-1. Propose to analyze for 1,4-dioxane using EPA Method 8270C SIM in groundwater samples collected from wells where chlorinated solvents were detected. Revise the SAP accordingly.

c) Groundwater sampling was conducted in February 2020 at wells MW-10, MW-11, and MW-17 for BTEX analysis. BTEX constituents were not detected in the groundwater samples collected from these wells. However, groundwater samples must continue to be collected from wells MW-10, MW-11, and MW-17 for BTEX analysis in order to demonstrate that the plumes are contained at the site. Revise the SAP accordingly.

Revise the SAP as directed and provide a replacement table.

See updated Table 4.2-1 in **Attachment A** regarding the response to Comments 2a and 2b.

2a: Transwestern will continue to sample and analyze SVE-30 and RW-1 for VOCs.

2b: Transwestern will sample and analyze SVE-28, SVE-30 and RW-1 for 1,4-dioxane.

2c: Transwestern will sample and analyze MW-10, MW-11, and MW-17 on an annual basis. A table showing historical data for MW-10, MW-11 and MW-17 showing exhibiting no change in concentrations since 1997, including no changes since the last sampling event in 2008 for those wells is included in **Attachment B**.

Comment 3

In Section 4.3, LNAPL Recoverability Data Collection, page 11, the Respondent states, "the field activities will involve removing LNAPL from specific groundwater wells and monitoring the amount of time LNAPL takes to rebound to original levels, if at all. The field evaluation will be performed individually for wells MW-1B, MW-16, MPE-16, MPE-27, and MPE-40 during 2020." Wells MPE-16, MPE-17, and MPE-40 are connected to the remediation system. It is not clear how LNAPL removal is proposed in this Plan because the remediation system should continuously remove LNAPL and groundwater from these wells. Provide a clarification in the response letter.

In addition, Comment 1 in NMED's Response to Comments TWP 2020-HWB-TWP-19-003, dated May 26, 2020 states, "since PSH thickness [in well SVE-23) significantly fluctuates over time, correlation between depth to water (DTW) and PSH thickness must be evaluated... Evaluate the correlation in future groundwater monitoring reports." The evaluation must be included in the 2020 Report." This direction applies to other wells that contain phase separated hydrocarbons (PSH). PSH must not be removed manually from

the wells at this time. Instead, evaluate correlation between DTW and PSH thickness in the wells and provide a discussion in the report of 2020 groundwater remediation activities. Once the presence of PSH is evaluated, NMED may require a separate work plan to mitigate PSH.

Transwestern will evaluate LNAPL in the wells MPE-16, 27, and MPE-40 during the next sampling event anticipated to be scheduled in November 2020. The system is required to be deactivated 48 hours to 72 hours prior to starting the sampling event. Once the system is deactivated, the depth to water (DTW) and depth to LNAPL (if present) will be measured in the wells periodically during the sampling event. Transwestern plans to reactivate the system at the completion of the sampling event.

Transwestern will evaluate the correlation between DTW and PSH thickness in wells and include the evaluation in the 2020 Annual report. As requested by NMED, PSH recovery will be suspended at this time.

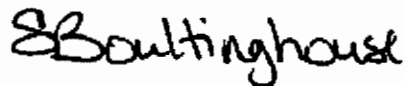
Comment 4

In Section 4.4, Suspected Perched Aquifer Evaluation, page 11, the Respondent states, "Transwestern has initiated the evaluation in April 2020 and will continue the evaluation in 2020. Transwestern will provide the results of the suspected perched aquifer evaluation along with future recommendations in the 2020 Annual Report." Because the Respondent proposes to provide recommendations in the 2020 report, submittal of an investigation work plan for the separate aquifer may be deferred at this time.

Comment noted.

Transwestern appreciates this opportunity to continue to work with NMED and NMOCD to continue to bring this site to closure. If you have any further questions or comments regarding these responses, please do not hesitate to contact me at (210) 870-2725 or JD Haines of EarthCon Consultants, Inc. at (317) 450-6126.

Sincerely,



Ms. Stacy Boultinghouse, PG
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Transwestern Pipeline Company, LLC
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Cc: M. Suzuki, NMED HWB
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JD Haines, EarthCon
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ATTACHMENTS

Attachment A - Updated Table 4.2-1

Table 4.2-1: Groundwater Sampling and Analysis Plan		
Well ID	1st Semiannual Event Analytical Parameters	2nd Semiannual Event Analytical Parameters
MW-10	BTEX	BTEX
MW-11	BTEX	BTEX
MW-13	--	BTEX
MW-14	--	BTEX
MW-16	BTEX	BTEX
MW-17	BTEX	BTEX
MW-20	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
MW-21	BTEX	BTEX
MW-22	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
MW-24D	--	BTEX
MW-26	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
MW-27	BTEX	BTEX
MW-29	BTEX	BTEX
MW-32	--	BTEX
MW-34	BTEX	BTEX
MW-35	--	BTEX
MW-37	--	BTEX
MW-39	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
MW-40	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
MW-41	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
MW-42	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
SVE-28	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
SVE-30	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane
RW-1	VOCs, 1-4 Dioxane	VOCs, 1-4 Dioxane

Notes:

1. BTEX – benzene, toluene, ethylbenzene, xylenes
2. VOCs – volatile organic compounds
3. BTEX and VOCs will be analyzed by EPA method 8260
4. 1,4-dioxane will be analyzed by EPA method 8270C SIM

The remediation system (including GET and SVE systems) shall be deactivated for 48 to 72 hours prior to the start of each sampling event. Depth to PSH, if present, and depth to groundwater will be measured in each groundwater monitoring well, MPE well, recovery well, and SVE well using an optical sensor probe capable of distinguishing between PSH and groundwater prior to purging and sampling activities. Fluid measurements should be completed within 48 hours.

Attachment B – Historical Data

Table 1: Historical data for MW-10, MW-11 and MW-17

Location	Date Sampled	Benzene	Ethyl Benzene	Toluene	Total Xylenes
MW-10	9/19/1996	2	<5	<5	<5
	7/31/1997	<1	<5	<5	<5
	11/1/1997	<5	<5	<5	<5
	1/27/1998	<5	<5	<5	<5
	5/26/1998	<5	<5	<5	<5
	8/13/1998	<5	<5	<5	<5
	12/22/1998	<1	<1	<1	<1
	3/23/1999	<1	<1	<1	<1
	9/7/1999	<1	<1	<1	<1
	3/27/2000	<1	<1	<1	<1
	3/27/2001	<1	<5	<5	<5
	7/3/2002	<1	<1	<1	<1
	8/1/2003	<1	<1	<1	<1
	9/9/2004	<1	<1	<1	<1
	10/7/2005	<1	<1	<1	<1
	9/22/2006	<1	<1	<1	<3
	9/27/2007	<1	<1	<1	<3
9/16/2008	<1	<1	<1	<3	
2/13/2020	<1	<1	<1	<1.5	
MW-11	9/19/1996	<1	<5	<5	<5
	7/30/1997	<1	<5	<5	<5
	11/1/1997	<5	<5	<5	<5
	1/27/1998	<5	<5	<5	<5
	5/26/1998	<5	<5	<5	<5
	8/13/1998	<5	<5	<5	<5
	12/22/1998	<1	<1	<1	<1
	3/24/1999	<1	<1	<1	<1
	9/7/1999	<1	<1	<1	<1
	3/27/2000	<1	<1	<1	<1
	3/27/2001	<1	<5	<5	<5
	7/3/2002	<1	<1	<1	<1
	8/1/2003	<1	<1	<1	<1
	9/9/2004	<1	<1	<1	<1
	10/7/2005	<1	<1	<1	<1
	9/22/2006	<1	<1	<1	<3
	9/27/2007	<1	<1	<1	<3
9/11/2008	<1	<1	<1	<3	
2/13/2020	<1	<1	<1	<1.5	
MW-17	9/24/1996	2	<5	<5	<5
	7/31/1997	<1	<5	<5	<5
	11/2/1997	<5	<5	<5	<5
	1/28/1998	<5	<5	<5	<5
	5/27/1998	<5	<5	<5	<5
	8/13/1998	<5	<5	<5	<5
	12/24/1998	<1	<1	<1	<1
	3/25/1999	<1	<1	<1	<1
	9/7/1999	<1	<1	<1	<1
	3/28/2000	<1	<1	<1	<1
	3/27/2001	<1	<5	<5	<5
	7/3/2002	<1	<1	<1	<1
	8/1/2003	<1	<1	<1	<1
	9/10/2004	<1	<1	<1	<1
	10/7/2005	<1	<1	<1	<1
	9/22/2006	<1	<1	<1	<3
	9/27/2007	<1	<1	<1	<3
9/11/2008	<1	<1	<1	<3	
2/13/2020	<1	<1	<1	<1.5	