



Certified Mail - Return Receipt Requested

January 12, 2022

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

**RE: [RESPONSE TO] APPROVAL WITH MODIFICATIONS REPORT OF 2020 GROUNDWATER
REMEDIAATION ACTIVITIES TRANSWESTERN COMPRESSOR STATION NO.9
TRANSWESTERN PIPELINE COMPANY
ROSWELL, CHAVES COUNTY, NEW MEXICO
EPA ID NMD986676955
HWB-TWP-21-001**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *[Response to] Approval with Modifications Report of 2020 Groundwater Remediation Activities Former Surface Impoundments Transwestern Compressor Station No.9* (Response), dated October 14, 2021, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues the following comments.

Comment 1

The response to NMED's *Approval with Modifications* Comment 2 states, "[s]ince January 2021 through September 2021, PSH thickness has been monitored monthly in SVE-23." Include the monthly gauging data and provide a discussion regarding the correlation between the thickness of phase separate hydrocarbons (PSH) and the water level in well SVE-23 in the 2021 Report. No revisions or response required.

Comment 2

The response to NMED's *Approval with Modifications* Comment 3 states, "[t]he recommendation [to recover PSH via manual bailing in well SVE-23] has been removed per NMED request." NMED's *Approval with Modifications* Comment 3 was provided before the Respondent submitted the *Report of Perched Aquifer Evaluation and Future Corrective Action Recommendations* to NMED. Comment 4 in the September 8, 2021 *Disapproval Report of*

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Perched Aquifer Evaluation and Future Corrective Action Recommendations states, “[t]he proposed interim measure is hereby approved. However, PSH recovery via manual bailing will not prevent PSH from expanding within and possibly beyond the perched aquifer. More effective remedies must be evaluated and proposed as an interim corrective measure in the revised Report.” Although no revisions are required to the Report, the PSH recovery effort must be initiated upon receipt of this letter. Provide a discussion regarding the effectiveness of manual bailing in the 2021 Report.

Comment 3

The response to NMED’s *Approval with Modifications* Comment 11 states, “[a]n illustration of MPE 20 is included for reference detailing the location of the top of the clay layer in relation to the well construction to help visually show how lowering the pump would penetrate the clay layer.” According to the illustration of MPE 20 (page 9), the screened interval of well MPE 20 does not extend to the clay layer although the bottom of the casing penetrates the clay layer. Therefore, lowering the pump would not affect the clay layer. It is still not clear how lowering the pump would penetrate the clay layer from the illustration. Since Section 4.2 was revised for clarity, no revisions are required.

Comment 4

The response to NMED’s *Approval with Modifications* Comment 12 states, “[a]s requested by NMED, OCD will be contacted to discuss the chloride and sulfate exceedances that appear to be present since 2009.” The OCD directives regarding this issue must be discussed in the 2021 Report. No response required.

The Respondent must address all comments contained in this letter in the 2021 Report. No revisions to the Report or response is necessary.

If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-690-6930.

Sincerely,

Rick Shean

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Shean
Date: 2022.01.12 14:49:34
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Rick Shean
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
B. Billings, NMOCD
M. Bratcher, NMOCD

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L. King, EPA Region 6 (6LCRRC)

File: TWP-20-001 and Reading 2021
NMOCD Administration Record, AP-125