



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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ENTERED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 9, 2021

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

**RE: ADDITIONAL RESPONSE TO COMMENTS 10/14/2020
APPROVAL WITH MODIFICATION
2019 GROUNDWATER REMEDIATION ACTIVITIES SURFACE IMPOUNDMENTS
TRANSWESTERN COMPRESSOR STATION NO.9
ROSWELL, CHAVES COUNTY, NEW MEXICO
EPA ID NMD986676955
HWB-TWP-20-001**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Additional Response to Comments 10/14/2020 Approval with Modification 2019 Groundwater Remediation Activities Former Surface Impoundments* (Response), dated March 16, 2021, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues the following comments.

Comment 1

In the response to NMED's *Approval with Modifications Comment 4*, the Respondent states, "[i]nformation associated with the perch[ed] aquifer evaluation and corrective action recommendations will be presented in the 2020 Annual Report." The information associated

Ms. Boultinghouse
April 9, 2021
Page 2

with the perched aquifer evaluation and corrective action recommendations must not be included in the 2020 Annual Report. Such information must be submitted under separate cover. Comment 4 of the NMED's *Approval with Modifications Laboratory Results Submittal for SVE and RW-1 Wells and Additional Laboratory Results Submittal for SVE and RW-1 Wells*, dated February 21, 2020, requires a report that summarizes the results of the perched zone investigation to be submitted to NMED no later than **September 30, 2020**. NMED has not received the submittal or an extension request letter. Regardless, the Permittee may incorporate the information associated with the perched aquifer evaluation and corrective action recommendations in the report required by NMED's February 21, 2020 *Approval with Modifications*. The report must be submitted no later than **June 1, 2021**.

Comment 2

The response to NMED's *Approval with Modifications* Comment 5 states, "[t]he benefit for incurring the additional cost to upgrade the system for operating over the extreme winter months would not be considerable since the remaining LNAPL in the subsurface appears to be at residual saturation levels." Since free flowing LNAPL is present at the site, LNAPL exists above residual saturation levels. The *2019 Annual Report* states that the groundwater/PSH recovery portion of the remediation system was deactivated from November to April due to freezing temperatures. The deactivation period is approximately six months and unusually long for southern New Mexico. The Respondent must resolve the issue to minimize the deactivation period before the coldest winter months in late 2021.

Comment 3

The response to NMED's *Approval with Modifications* Comment 5 states, "[f]urthermore, since the LNAPL and dissolved-phase plume is controlled, it is recommended that the groundwater extraction system operate in a pulsing manner by alternating the operation of select extraction wells over a certain period time. This will allow sufficient time for residual LNAPL to rebound and be recovered more efficiently." The details of the proposed enhancement must be described in the annual update to the Operation, Maintenance and Monitoring Plan (O&MM Plan). Submit the O&MM Plan to include the enhancement of the remediation system no later than **May 31, 2021**, as required by the Order Section IV.A.

Ms. Boultinghouse

April 9, 2021

Page 3

If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-476-6046.

Sincerely,

**Kevin
Pierard**

Digitally signed by Kevin Pierard
Date: 2021.04.09 08:59:01 -06'00'

Kevin M. Pierard, Chief
Hazardous Waste Bureau

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

File: Reading File and TWP 2021 File