Certified Mail - Return Receipt Requested

July 6, 2021

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

RE: APPROVAL WITH MODIFICATIONS
OPERATION, MAINTENANCE, AND MONITORING (OM&M) PLAN
TRANSWESTERN COMPRESSOR STATION NO.9
ROSWELL, CHAVES COUNTY, NEW MEXICO
EPA ID NMD986676955
HWB-TWP-21-002

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Operation, Maintenance, and Monitoring (OM&M) Plan* (OM&M Plan), dated May 2021, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues this Approval with Modifications with the following comments.

Comment 1
The title (OM&M Plan) must specify the year relevant to the document for clarity. For example, this OM&M Plan should have been titled as the 2021 OM&M Plan. Include the relevant year in the title of the OM&M Plan in the future.

Comment 2
In Section 1.0, *Introduction,* page 1, the Respondent states, "[t]his Revised OM&M Plan was developed in general accordance with Section IV of the SO and the Site's Stage 2 Abatement Plan (AP), dated December 3, 2015 and approved by New Mexico Oil and Conservation District (OCD) on March 1, 2016." OCD stands for "Oil Conservation Division". Correct the typographical error in future OM&M Plans.

Comment 3

In Section 3.3, *Groundwater Extraction and Treatment System,* page 4, the Respondent states, "[t]he surge tank, air stripper, bag filters, carbon vessels, and irrigation tank are located outside without an enclosure. During cold weather conditions, the system is deactivated to prevent damage caused by freezing water." An enclosure must be provided for the equipment to protect them from freezing temperatures, as appropriate. The *Report of 2020 Groundwater Remediation Activities Former Surface Impoundments Transwestern Compressor Station No.9* (Report), dated April 2021, states, "[a]s during prior years of operation, the groundwater portion of the system was manually deactivated in January, February, March, November, and December of 2020 due to freezing temperatures. To protect the groundwater treatment system and minimize deactivation periods during future operations, heat tape and pipe insulation have since been installed throughout the process. Additional weather protection will be added as needed to minimize downtime during winter months." Comment 2 of the NMED's *Additional Response to Comments 10/14/2020 Approval with Modification 2019 Groundwater Remediation Activities Former Surface Impoundments*, dated April 9, 2021, states, "[t]he 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." The mean temperatures during the months of January, February, March, November, and December in Roswell, New Mexico are reportedly above the freezing point and the weather is relatively mild. Therefore, it may not be necessary to deactivate the system for the winter months even without additional weather protection. Discuss the measures to be or that have been, implemented to minimize the deactivation period in the 2022 OM&M Plan. No revision required.

Comment 4

In Section 4.2, *Groundwater Monitoring,* page 9, the Respondent states, "[t]hese three wells [MW-10, MW-11, and MW-17] were sampled during the November 2019/January 2020 sampling event and analyzed for BTEX. All three wells remain non-detect for BTEX constituents. These wells will be removed from the 2020 SAP as the sampling requirements have been met as outlined in the June 27, 2019 OM&M plan approved by NMED." The proposed changes regarding the sampling and analysis plan (SAP) discussed in this OM&M Plan are pertinent to 2021 rather than 2020. Correct the typographical error. In addition, the statement appears to be contradictory to Table 4.2-1, *Groundwater Sampling and Analysis Plan*, page 10. According to Table 4.2-1, wells MW-10, MW-11, and MW-17 are proposed to be sampled for BTEX during the second semi-annual sampling event in 2021, which is appropriate. Comment 2, item c of the NMED's July 2, 2020 *Approval with Modifications*, states, "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." Since wells MW-10, MW-11, and MW-17 are located downgradient of the plumes, the comment remains valid and these wells must not be removed from the SAP and continue to be sampled annually. Revise the OM&M Plan accordingly and provide replacement pages.

Comment 5
In Section 4.2, *Groundwater Monitoring,* page 9 through 10, the Respondent states, "[d]uring the 2019 sampling events 12 of the 14 SVE wells [SVE-1A, SVE-2A, SVE-3, SVE-22, SVE-23, SVE-24, SVE-25, SVE-26, SVE-27, SVE-28, SVE-30, and SVE-31] and the recovery well (RW-1) were sampled and analyzed for VOCs in keeping with NMEDs Response to Approval with Modifications Comments dated August 17, 2018. The monitoring requirements were met during the 2019 semiannual sampling events and the SVE wells have been removed from the 2020 SAP." According to Table 4.2-1, wells SVE-28, SVE-30, SVE-31, and RW-1 are proposed to be sampled in 2021, which is appropriate. Propose to collect groundwater samples from wells SVE-28, SVE-30, SVE-31, and RW-1 in 2021, as indicated in Table 4.2-1. Wells SVE-1A, SVE-2A, SVE-3, SVE-22, SVE-24, SVE-26, and SVE-27 were dry and phase separate hydrocarbons (PSH) were detected in wells SVE-23 and SVE-25 in 2020; therefore, these wells were not sampled; however, these wells must continue to be monitored for the presence of groundwater and PSH and the gauging data must be reported in the 2021 annual groundwater monitoring report. Revise the OM&M Plan accordingly and provide replacement pages.

Comment 6
In Section 4.2, *Groundwater Monitoring,* page 10, footnote 3 of Table 4.2-1 states, "BTEX and VOCs will be analyzed by EPA method 8260." Since the list of VOCs analyzed by EPA method 8260 includes BTEX constituents, it is not clear why analytes are separately listed as BTEX and VOCs. Note that all constituents detected above respective detection limits must be reported in annual groundwater monitoring reports. Provide a clarification in a response letter or revise Table 4.2-1 to replace BTEX with VOCs.

Comment 7
In Section 4.3, *Pulse-Pumping Program,* page 12, the Respondent states, "Transwestern will provide a summary of the pulse-pumping program and future recommendations in the forthcoming Annual Monitoring Report to NMED." NMED hereby approves implementation of the proposed pulse-pumping program. No response required.

The Respondent must address all comments in this letter and submit a response letter, replacement pages, a table and an electronic redline-strikeout version of the revised OM&M Plan showing where all changes have been made to the OM&M Plan and also a clean electronic version of the revised OM&M Plan no later than **October 1, 2021**.

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 Approval with Modifications, please contact Michiya Suzuki of my staff at 505-690-6930.

Sincerely,

Ricardo Maestas Digitally signed by Ricardo Maestas
Date: 2021.07.06 16:29:12 -06'00'

Ricardo Maestas, Acting 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-20-002 and Reading 2021
NMOCD Administration Record, AP-125