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**Certified Mail - Return Receipt Requested**

July 15, 2021

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

**RE: APPROVAL WITH MODIFICATIONS  
REPORT OF 2020 GROUNDWATER REMEDIATION ACTIVITIES  
FORMER SURFACE IMPOUNDMENTS  
TRANSWESTERN COMPRESSOR STATION NO.9  
ROSWELL, CHAVES COUNTY, NEW MEXICO  
EPA ID NMD986676955  
HWB-TWP-21-001**

Dear Ms. Boultinghouse:

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

**Comment 1**

The Executive Summary, page vi, 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,

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Ms. Boultinghouse

July 15, 2021

Page 2

March, November, and December in Roswell, New Mexico are reportedly above freezing 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. Evaluate whether the system can be deactivated for shorter periods in response to weather conditions, in order to minimize deactivation periods. Provide a discussion in a response letter.

#### **Comment 2**

In Section 3.3.1, *Perched Aquifer*, pages 7 and 8, the Respondent states, “[s]ince SVE-23 is the only well to contain PSH [in the wells screened across the perched aquifer], it is believed the PSH in SVE-23 may be residual product that may have accumulated in that well. Historical PSH measurements in wells located in the perched aquifer and upper aquifer indicate that the PSH footprint has stabilized or decreased.” According to Table 3-2, *Summary of Groundwater Surface Elevations*, page 35 of 70, the PSH column thicknesses in well SVE-23 in the January 2020, January 2021, and April 2021 measurements are recorded as 0.65, 1.08, and 3.00 feet, respectively, and PSH has been detected in well SVE-23 since 2009. The PSH column thickness does not exhibit either decreasing or stabilizing trends; rather it is fluctuating and persistent. The PSH plume is likely present on the perched aquifer. Re-evaluate the conditions regarding the PSH in well SVE-23 and correct the statement, as appropriate, and provide replacement pages.

#### **Comment 3**

In Section 3.3.1, *Perched Aquifer*, page 8, the Respondent states, “Transwestern recommends that PSH recovery via manual bailing be initiated immediately in SVE-23 considering the overall corrective action objective for the site. Liquid levels and recovery data collected from SVE-23 during bailing activities will be evaluated to determine if a more aggressive recovery method is warranted.” The Respondent submitted the *Extension Request regarding the Report of Perched Aquifer Evaluation and Future Corrective Action Recommendations* (Request), dated May 26, 2021 and the Request was approved on June 8, 2021. The Request states that the document will be submitted no later than **July 1, 2021**. Unless the document (*Report of Perched Aquifer Evaluation and Future Corrective Action Recommendations*) is submitted, reviewed and evaluated, NMED will not be able to determine whether the recommendation to stop the PSH measurements and initiate PSH recovery via manual bailing is appropriate. Therefore, the recommendation cannot be approved at this time and Comment 4 of the NMED’s *Approval with Modifications Report of 2019 Groundwater Remediation Activities*, dated July 2, 2020, still remains valid. Remove the recommendation from the revised Report and provide replacement pages.

#### **Comment 4**

In Section 3.3.2, *Upper Aquifer*, page 8, the Respondent states, “PSH trends decrease since 2018.” According to Table 3-2, *Summary of Groundwater Surface Elevations*, page 7 of 70, the measured PSH thicknesses in well MW-16 in the May 2018, May 2020, and April 2021 measurements are recorded as 1.22, 0.31, and 1.66 feet, respectively. PSH appears to be

Ms. Boultinghouse

July 15, 2021

Page 3

fluctuating or increasing in well MW-16 since 2018. The statement may or may not be accurate for some wells screened in the upper aquifer. Provide more detail to support the assertion and provide replacement pages.

**Comment 5**

In Section 3.4.1, *Perched Aquifer*, page 8, the Respondent states, “[a]nalytical data also indicates that 1,4-dioxane was not detected in SVE-28 or RW-1; although 1,4-dioxane was detected in SVE-30, it was not above the GCL.” According to Table 3-5a, *Summary of Groundwater Analytical Results*, the 1,4-dioxane concentration in the groundwater sample collected from well RW-1 in November 23, 2020 is recorded as <25 µg/L, exceeding the groundwater cleanup level (GCL) of 6.72 µg/L. It is impossible to demonstrate whether 1,4-dioxane is present at concentrations above or below the applicable GCL. All analytes whose limit of quantitation (LOQ) values are higher than the applicable GCLs are considered data quality exceptions and must be identified as such. Revise the Report accordingly and provide replacement pages.

**Comment 6**

In Section 3.4.2, *Upper Aquifer*, page 9, the Respondent states, “[a]nalytical data indicates that other VOCs were detected in MW-20, MW-22, MW-26, MW-39, MW-41, and MW-42, but only 1,1-DCE was detected at concentrations exceeding GCLs in wells MW-26 and MW-39.” According to Table 3-5a, *Summary of Groundwater Analytical Results*, the naphthalene concentrations in the groundwater samples collected from wells MW-20, MW-22, MW-26, MW-39, MW-41, and MW-42 in 2020 are recorded as <2 µg/L, exceeding the groundwater cleanup level (GCL) of 1.43 µg/L. Therefore, it is unknown whether naphthalene is present at concentrations above or below the GCL. All analytes whose LOQ values are higher than the applicable GCLs are considered data quality exceptions and must be identified as such. Revise the Report accordingly and provide replacement pages (see Comment 5 above).

**Comment 7**

In Section 4.1, *Soil Vapor Extraction System Monitoring Results*, page 12, the Respondent states, “[l]aboratory data packages are included in Appendix C.” A hard copy of the laboratory analytical reports is not required in the future reports. Provide an electronic copy on CD/DVD only in future reports.

**Comment 8**

In Section 4.2, *Groundwater Treatment System Monitoring Results*, page 12, the Respondent states, “[o]peration records for the irrigation system presented in Table 4-2 indicate that the volume of groundwater recovered, treated, and discharged in 2020 was approximately 97,400 gallons.” According to Table 4-2, *Summary of Treated Water Irrigation Rates*, page 4 of 4, the volume of water treated in 2020 is recorded as 94,800 gallons. Resolve the discrepancy and provide replacement pages.

**Comment 9**

In Section 4.2, *Groundwater Treatment System Monitoring Results*, page 12, the Respondent states, “[a]ccording to Table 4-3, approximately 8.07 pounds (1.27 equivalent gallons) of dissolved-phase hydrocarbons were removed by the groundwater/PSH recovery system in 2020.” Table 4-3, *Groundwater Treatment System Mass Removal Calculations for Total BTEX*, does not include the estimated mass of dissolved-phase hydrocarbons removed each year. Include the estimated mass of dissolved-phase hydrocarbons removed each year. In addition, Table 4-6, *Historical Hydrocarbon Removal Summary*, indicates that the mass of dissolved-phase hydrocarbons removed in 2020 is 6.22 pounds rather than 8.07 pounds. Resolve the discrepancy and provide replacement pages.

**Comment 10**

In Section 4.2, *Groundwater Treatment System Monitoring Results*, page 12, the Respondent states, “approximately 940 gallons of PSH accumulated in the surge tank in 2020. PSH separated in the surge tank is removed by a vacuum truck and sent to a permitted off-site disposal facility periodically. Historical PSH recovery volumes are provided in Table 4-6.” Table 4-6, *Historical Hydrocarbon Removal Summary*, indicates that the mass of PSH recovered in 2020 is 5,950 pounds; however, the table does not present the PSH recovery volume. Present the PSH recovery volume in the table and provide replacement pages.

**Comment 11**

In Section 4.2, *Groundwater Treatment System Monitoring Results*, page 12, the Respondent states, “[t]he MPE wells are installed on top of the clay layer, and the pumps are currently installed 6 inches from the bottom of the wells. Lowering the pumps in the wells is not possible as the clay layer might be penetrated.” It is not clear how lowering the pump would penetrate the clay layer because well end cap would prevent the pump from reaching below the clay layer. Provide a clarification in the response letter.

**Comment 12**

In Section 4.2, *Groundwater Treatment System Monitoring Results*, page 13, the Respondent states, “analytical data for the Post-Treatment sample indicate that BTEX was not detected above laboratory reporting limits.” According to Table 4-4, *Summary of Water Treatment System Analyses*, page 65 of 69, the chloride and sulfate concentrations in the Post-Treatment samples consistently exceed the New Mexico Water Quality Control Commission (NMWQCC) standards of 250 and 600 mg/L, respectively. The Respondent must discuss the issue of the chloride and sulfate exceedances with the New Mexico Oil Conservation Division (OCD). Carbon copy (CC) NMED on the OCD notification regarding the issue.

**Comment 13**

In Section 4.2, *Groundwater Treatment System Monitoring Results*, page 13, the Respondent states, “[b]etween April and September 2020, the air stripper was monitored at multiple points to detect potential breakthrough of VOCs through the carbon treatment system.” According to

Ms. Boultinghouse

July 15, 2021

Page 5


Table 4-5, *Summary of Air Stripper Vapor Monitoring*, the carbon treatment system has been effectively removing VOCs removed by the air stripper. However, the Report does not provide any discussion regarding the findings (e.g., potential breakthrough of VOCs through the carbon treatment system). Provide a discussion for the findings and provide replacement pages.

The Respondent must address all comments in this letter and submit a response letter, replacement pages, tables and figures and redline-strikeout and clean electronic versions of the revised Report no later than **October 15, 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,

A handwritten signature in black ink, appearing to read "Ricardo Maestas", with a long horizontal flourish extending to the right.

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