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September 8, 2021

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

**RE: DISAPPROVAL  
REPORT OF PERCHED AQUIFER EVALUATION AND FUTURE CORRECTIVE ACTION  
RECOMMENDATIONS  
TRANSWESTERN COMPRESSOR STATION NO.9  
ROSWELL, CHAVES COUNTY, NEW MEXICO  
EPA ID NMD986676955  
HWB-TWP-21-003**

Dear Ms. Boultinghouse:

The New Mexico Environment Department (NMED) has reviewed the *Report of Perched Aquifer Evaluation and Future Corrective Action Recommendations* (Report), dated June 2021, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues this Disapproval with the following comments.

**Comment 1**

In Section 2.0, *Perched Aquifer Evaluation*, page 6, the Respondent states, “[b]oring logs developed for SVE, and the deeper multiphase extraction (MPE) wells were reviewed, which did not note a distinct water bearing zone between the surface and 50 feet bgs.” The referenced boring logs were not included in the Report. Provide all relevant boring logs and well construction diagrams in the revised Report or reference the previously submitted documents that present the logs and well construction diagrams.

**Comment 2**

In Section 2.2, *Groundwater Analytical Results*, page 7, the Respondent states, “[g]roundwater samples were collected and analyzed for BTEX by EPA method 8260 or for VOCs via EPA Method 8260B, and 1,4-dioxane was analyzed by EPA method 8270SIM in accordance with the approved Sampling and Analysis Plan (SAP). The analytical results for groundwater samples in the are summarized in Table 2-3.” Table 2-3, *Summary of Groundwater Analytical Results in the*

*Perched Aquifer*, did not include analytical results for 1,4-dioxane. Revise the table to include the results of 1,4-dioxane analysis in the revised Report. In addition, the page number and designation of the table in the footer of Table 2-3 are shown as page 7 of 7 and Table 3-5, respectively. They are incorrect and must be revised to present correct page number (page 1 of 1) and designation of the table (Table 2-3). Correct the page number and designation of the table in the revised Report.

### **Comment 3**

In Section 2.2, *Groundwater Analytical Results*, page 7, the Respondent states, “[b]ased on the 2020 analytical data, the areal distribution of BTEX, Benzene, and 1,1-DCA in the Perched Aquifer remains delineated within the Project Area boundaries and within the limits of the plume in the lower water bearing unit; as well as being consistent with the 2019 data for those wells (Figures 3-1 through 3-3).”

Section 2.0, *Perch[ed] Aquifer Evaluation*, pages 5 and 6, states, “[t]wo of the deepest wells in the perched aquifer, RW-1 and SVE-30, are both over 41 ft BTOC and consistently have measurable groundwater. Wells SVE-23 and SVE-28 are each approximately 36 ft BTOC and typically have measurable groundwater, including the year 2020. Wells SVE-22, SVE-25, SVE-27, and SVE-31 (all approximately 33 ft BTOC) often do not have water; SVE-22, SVE-27, and SVE-31 were dry during at least part of 2020. Wells SVE-24 and SVE-26 (28.9 and 32.5 ft BTOC, respectively) have not had measurable water in the past five years.”

Section 2.0 indicates that a sufficient number of wells was not completed in the water bearing zone in the perched aquifer. Section 2.2 asserts that the perched aquifer remains delineated, but the assertion is not supported by the data provided by the Report. Many wells advanced to the perched aquifer are too shallow to produce water; therefore, they are not useful to support the assertion and the plumes are not delineated in the perched aquifer. Revise the Report to provide the data that supports the assertion or propose to submit a work plan to install wells to delineate the horizontal and vertical extent of the plumes in the perched aquifer in the revised Report. In addition, referencing depth relative to the top of well casings does not provide useful information since well stickups can vary. Depths relative to ground surface elevations provide useful information.

### **Comment 4**

In Section 3.0, *Future Corrective Action Recommendations*, page 7, the Respondent states, “Transwestern recommends that PSH recovery via manual bailing be initiated immediately in SVE-23 and SVE-25 considering the overall corrective action objective for the site. It is apparent that LNAPL is present at recoverable thicknesses and PSH will be monitored for rebound after selected recovery event[s].” The 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.

**Comment 5**

In Section 3.0, *Future Corrective Action Recommendations*, page 7, the Respondent states, “[l]iquid levels and recovery data collected from bailing activities has been evaluated and the current remediation system is effective showing a decrease in BTEX, and 1,1-DCE concentrations. Due to the current results of the PSH plume and dissolved-phase concentrations, additional delineation does not appear warranted at this time.” NMED does not agree with the statement. The contaminant concentrations are fluctuating in the groundwater samples collected from the perched aquifer according to Table 2-3. In addition, many wells advanced to the perched aquifer are too shallow to produce water; therefore, they are not useful for delineation. Furthermore, the current SVE wells advanced to the perched aquifer do not extract liquid PSH or contaminated groundwater and are not capable of containing the plumes. The horizontal and vertical extent of the plumes must be delineated and more effective interim measures must be proposed to contain the plumes in the perched aquifer (see Comments 3 and 4 above). Revise the Report accordingly.

**Comment 6**

According to Table 2-1, *Summary of Perched Aquifer Well Completion Details*, the measured depth of well SVE-23 is recorded as 36.70 feet from the TOC. However, depth to groundwater in well SVE-23 is recorded as 37.00 feet below TOC according to Table 2-2, *Summary of Groundwater Surface Elevations for Wells in the Perched Aquifer*. Resolve the discrepancy in the revised Report. In addition, the page numbers and designation of the tables shown in the footer of the tables are incorrect. Correct the page numbers and designation of the tables in the revised Report (see Comment 2 above).

The Respondent must submit a revised Report that addresses all comments contained in the letter. Two hard copies and an electronic version of the revised Report must be submitted to the NMED. The Permittee must also include a redline-strikeout version in electronic format showing where all revisions to the Report have been made. The revised Report must be accompanied with a response letter that details where all revisions have been made, cross-referencing NMED’s numbered comments. The revised Report must be submitted to NMED no later than **January 31, 2022**.

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

Sincerely,



Ricardo Maestas, Acting Chief  
Hazardous Waste Bureau

Ms. Boultinghouse  
September 8, 2021  
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cc: D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
B. Billings, NMOCD  
M. Bratcher, NMOCD  
L. King, EPA Region 6 (6LCRRC)

File: TWP-20-003 and Reading 2021  
NMOCD Administration Record, AP-125