



MICHELLE LUJAN GRISHAM  
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JAMES C. KENNEY  
CABINET SECRETARY

**Certified Mail - Return Receipt Requested**

March 1, 2022

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

**RE: APPROVAL WITH MODIFICATIONS  
[REVISED] 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 *[Revised] Report of Perched Aquifer Evaluation and Future Corrective Action Recommendations* (Report), dated January 2022, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues this Approval with Modifications with the following comments.

**Comment 1**

The response to NMED's Disapproval Comment 1 states, "[b]oring logs are included in Attachment 1 in the revised Report." The referenced "Attachment 1" is not included in the Report. Provide the required boring logs with the response letter.

**Comment 2**

The response to NMED's Disapproval Comment 3 states, "[a] work plan will be developed to provide details for delineating the horizontal and vertical extent of the plumes in the perched aquifer [and] surveying the ground elevations in these locations will be included within the forthcoming work plan." NMED concurs; however, a proposed schedule for submittal of the work plan was not included with the response. Submit the referenced work plan no later than **August 31, 2022**.

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313  
Telephone (505) 476-6000 - [www.env.nm.gov](http://www.env.nm.gov)

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**Comment 3**

The response to NMED's Disapproval Comment 4 states, "[i]nformation related to PSH recovery in the perched aquifer is provided in the revised Report." Although the Report was revised to address the NMED's Disapproval Comment 4, the response does not identify the sections of the Report where text was revised. Identify all sections of the Report where text was revised based on the comment in the response letter.

Section 3 (Future Corrective Action Recommendations) states, "[d]ata will be collected from manual bailing events during 2022 to determine feasibility of additional recovery measures or impracticability. Results will be provided in the 2022 Annual Groundwater Remediation Activities Report." NMED acknowledges that remedies for phase separate hydrocarbons (PSH) in the perched aquifer will be evaluated based on the data collected in 2022 in the 2022 Annual Groundwater Remediation Activities Report.

The Respondent must address all comments in this Approval with Modifications and submit a response letter. The response letter and Attachment 1 (Boring Logs) required by Comment 1 must be submitted to NMED no later than **April 29, 2022**. In addition, a work plan required by Comment 2 must be submitted to NMED no later than **August 31, 2022**.

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 letter, please contact Michiya Suzuki of my staff at 505-690-6930.

Sincerely,

**Rick Shean**

Digitally signed by Rick  
Shean  
Date: 2022.03.01  
08:49:32 -07'00'

Rick Shean  
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-21-003 and Reading 2022  
NMOCD Administration Record, AP-125