



ENTERED

MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested

September 6, 2022

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

**RE: APPROVAL WITH MODIFICATIONS
[2022] 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 *[2022] Operation, Maintenance, and Monitoring (OM&M) Plan* (OM&M Plan), dated May 2022, submitted by Transwestern Pipeline Company, LLC (the Respondent). NMED hereby issues this Approval with Modifications with the following comments.

Comment 1

Comment 1 of the NMED's July 6, 2021 *Approval with Modifications* states, "[t]he title (OM&M Plan) must specify the year relevant to the document for clarity." This direction was not followed. Include the relevant year in the title of the OM&M Plan and provide a replacement page.

Comment 2

Comment 2 of the NMED's July 6, 2021 *Approval with Modifications* states, "OCD stands for "Oil Conservation Division". Correct the typographical error in future OM&M Plans." However, the same typographical error (i.e., Oil Conservation District) was found in Section 1.0, *Introduction*, page 1. The Respondent must follow the directions provided by NMED. Correct the typographical error and provide replacement pages.

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

Comment 3

In Section 1.0, *Introduction*, page 1, the Respondent states, “[t]his Revised OM&M Plan was developed to reflect changes requested by NMED (Attachment A) and in the following documents:

- Response to Approval with Modifications Comments, Operation, Maintenance, and Monitoring (OM&M) Plan, dated September 8, 2021”

NMED issued direction associated with the 2021 OM&M Plan (i.e., the July 6, 2021 *Approval with Modifications* and December 20, 2021 *Response to Approval with Modifications*) in addition to the referenced letter (September 8, 2021 *Response to Approval with Modifications*). Although the changes associated with groundwater monitoring and sampling required by the NMED’s July 6 and December 20, 2021 letters were addressed in Section 4.2, *Groundwater Monitoring*, page 9, several directions included in the letters were not incorporated in the 2022 OM&M Plan (e.g., refer to Comments 1 and 2 above). The 2022 OM&M Plan must address every comment provided by the NMED’s July 6, September 8, and December 20, 2021 letters. Revise the OM&M Plan accordingly and provide replacement pages.

In addition, Attachment A (Chronological List of Regulatory Documentation) does not list any correspondence after April 29, 2021. Include the correspondence exchanged between NMED and the Respondent throughout the year of 2021 in the revised Attachment A and provide replacement pages.

Comment 4

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.” The Respondent’s October 20, 2021 correspondence states, “Transwestern will install additional cold weather protection as needed to minimize downtime.” Furthermore, Section 5.1, *Cold Weather Protection and Procedures*, page 12 through 13, provides discussion regarding the cold weather protection that was installed or will be installed. The text of Section 3.3 must reference the sections where such discussion is provided; otherwise, it is not clear whether or not the NMED’s previous direction regarding cold weather protection were incorporated in the OM&M Plan. Revise the text of Section 3.3 for clarity and provide replacement pages.

Comment 5

In Section 4.2, *Groundwater Monitoring*, page 9, the Respondent states, “[w]ells SVE-1A, SVE-2A, SVE-3, SVE-22, SVE-23, SVE-25, SVE-26, and SVE-27 will be monitored for presence of groundwater and PSH, and data will be reported in annual groundwater monitoring reports.” If groundwater is detected in the referenced SVE wells, propose to collect groundwater samples and analyze them for the full suite of volatile organic compounds (VOCs) by EPA Method 8260B.

Ms. Boultinghouse
September 6, 2022
Page 3

Revise the OM&M Plan to include the provisions and provide replacement pages.

Comment 6

Comment 6 of the NMED's July 6, 2021 *Approval with Modifications* states, "[n]ote that all constituents detected above respective detection limits must be reported in annual groundwater monitoring reports." If any constituents other than benzene, toluene, ethylbenzene, xylenes (BTEX) are detected above their respective reporting limits in the groundwater samples collected from wells MW-27, MW-29, and MW-34 during the 2022 second semiannual sampling event where the full suite of VOC analysis is proposed, all detected constituents in addition to the proposed analytes (i.e., BTEX) must be retained as target analytes in the subsequent year of the first semiannual sampling event. Revise the OM&M Plan to include the provisions and provide replacement pages.

The Respondent must address all comments in this letter and submit a response letter, replacement pages, 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 **December 2, 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 Approval with Modifications, please contact Dave Cobrain of my staff at 505-476-6055.

Sincerely,

Rick Shean

Digitally signed by Rick
Shean
Date: 2022.09.06
13:51:12 -06'00'

Rick Shean,
Chief
Hazardous Waste Bureau

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

File: TWP-22-002 and Reading 2022
NMOCD Administration Record, AP-125