GW - 52

GENERAL CORRESPONDENCE

YEAR(S):
1995

OCD CHRONOLOGY OF REMEDIAL ACTIONS
TRANSWESTERN PIPELINE ROSWELL STATION

2/14/92	Larry Campbell (Transwestern) meets with Roger Anderson (Oil Conservation Division (OCD) to discuss closure of surface impoundments at Compressor Station No. 9.
5/6/92	Joint meeting attended by Transwestern, NMED and OCD. Transwestern states intention to hire Halliburton-NUS Corporation to install a monitor well in the center of the former pit to remove and test liquids to determine their status as hazardous waste. Field work scheduled to begin July 20, 1995.
12/10/92	Joint meeting by Transwestern, NMED and OCD to discuss remediation and closure activities at former surface impoundments. NMED requests that the RCRA Part A permit application submitted previously be resubmitted using the proper EPA forms. The schedule for submittal of other documents and information is also discussed.
9/7/93	Transwestern notifies OCD of the installation of product recovery pumps in three monitor wells as part of ground-water cleanup and requests associated modifications to Discharge Plan GW-52.
9/22/93	OCD requests additional information regarding the design of the product recovery system prior to approving modifications to Discharge Plan GW-52.
10/25/93	Transwestern responds to comments from OCD regarding the product recovery system.
11/18/93	OCD approves Transwestern's proposed modifications to Discharge Plan GW-52 in accordance with ongoing remedial activities.
8/4/94	OCD conducts joint inspection with Terry Davis, Mare Sides, and Cornelius Amindyas of the NMED HRMB, Larry Campbell (Transwestern), Bill Kendrick (Enron Operations Corporation), and George Robinson (Cypress Engineering Services) at the Roswell Station site to gather information for a RCRA Facility Assessment.
7/26/95	Transwestern submits Phase I Soil & Groundwater Assessment work plan to OCD.
8/11/95	OCD conditionally approves Transwestern's Phase I Soil & Groundwater Assessment work plan.
8/22/95	OCD inspects drilling and sampling operations of Phase I activities and splits ground water samples from monitor wells.

8/23/95 Daniel B. Stephens & Associates completes the Phase I Soil and Ground Water assessment field activities in which soil samples were collected from the area of the former surface impoundments, three ground water monitor wells were installed down gradient of the former surface impoundments, and ground water samples were collected from three on-site and the three newly installed off-site monitor wells.

9/26/95 OCD sends Transwestern and HRMB copies at OCD's 8/22/95 ground water analyses.

10/26/95 Transwestern submits request to dispose of investigation derived wastes to OCD.

11/9/95 Transwestern submits Phase I Soil & Groundwater Assessment Report to OCD and commits to send OCD a Phase II work plan by 12/15/95 for additional definition of the extent of contamination.

11/13/95 OCD conditionally approves of Transwestern's request to dispose of investigation derived wastes.

12/8/95 OCD meets with NMED HRMB and Ed Kelley NMED Director to discuss Transwestern's October 11, 1995 correspondence which provides Transwestern's technical and legal analysis of the reasons why this case should be regulated under OCD/WQCC authority and not under RCRA regulations.

12/19/95 Transwestern submits Phase II Soil & Groundwater Assessment work plan to OCD.

1/26/96 OCD requests NMED HRMB comments on Phase I report and Phase II work plan.

Events And Correspondence Chronology
Roswell Station Remediation Project
Transwestern Pipeline Company

Revised 8/24/95 (most recent revisions are in bold type)

8/60	Compressor station begins operations.
Prior to 10/72	Pit 1 is constructed to replace Pit 2.
6/73-4/81	Period during which Pit 2 and Pit 3 (if Pit 3 existed) are back-filled. **The timeframe is based on a review of air photos.**
6/82	**The 210 bbl waste lube oil tank is placed in service. No releases of waste lube oil after this date.**
11/83	**The 500 bbl pipeline liquids tank is placed in service. No releases of pipeline liquids after this date. In addition, the scrubbers, the wash rack, and the engine room floor drains are tied into the 500 bbl pipeline liquids tank at this time.**
11/83	**Last use of surface impoundments. No releases to surface impoundments after this date.**
12/31/85	F001, F002, F004, & F005 wastes redefined to include mixtures & blends of listed wastes.
6/86	Pit 1 back-filled.
4/90	Transwestern requests permission from the State of New Mexico Office of the Commissioner of Public Lands to drill exploratory borings on State Trust land in order to collect soil samples to assess soil contamination.
4/2/90	State of New Mexico Office of the Commissioner of Public Lands (Surface Water Resources Division) authorizes Transwestern to drill exploratory borings on State Trust land for the purpose of obtaining soil samples to be tested for contamination.
6/20/91	Harding Lawson Associates completes shallow soil vapor investigation at Compressor Station No. 9.
7/17/91	Transwestern requests authorization to drill additional soil borings on State Trust land northeast of the compressor station.
7/22/91	State of New Mexico Office of the Commissioner of Public Lands (Surface Water Resources Division) authorizes Transwestern to drill approximately 15 soil borings to allow collection of soil samples.
12/91	Metric Corporation completes report on a shallow subsurface investigation at the compressor station.
2/14/92	Larry Campbell (Transwestern) meets with Coby Muckelroy and Bruce Swanton (New Mexico Environment Department [NMED]) to discuss closure of surface impoundment at Compressor Station No. 9.
2/14/92	Larry Campbell (Transwestern) meets with Roger Anderson (Oil Conservation Division [OCD]) to discuss closure of surface impoundment at Compressor Station No. 9.
4/29/92	Bruce Swanton (NMED) calls Larry Campbell (Transwestern) to request additional information regarding the former surface impoundments.

Attachment D

5/6/92 Joint meeting attended by Transwestern, NMED and OCD. Transwestern states intention to hire Halliburton-NUS Corporation to install a monitor well in the center of the former pit to remove and test liquids to determine their status as hazardous or non-hazardous waste. Field work scheduled to begin July 20, 1992.

7/92 Monitor well MW-1 installed by Halliburton-NUS Environmental Corporation.

10/92 Halliburton NUS completes report on monitor well installation at the compressor station.

10/15/92 Joint meeting attended by Transwestern, NMED and OCD. Transwestern presents the results of sampling and analysis of the new monitor well. Options for closure of the site are discussed.

11/30/92 Transwestern submits duplicate copies of a RCRA Part A permit application to NMED and OCD.

12/10/92 Joint meeting attended by Transwestern, NMED and OCD to discuss remediation and closure activities at former surface impoundments. NMED requests that the RCRA Part A permit application submitted previously be resubmitted using the proper EPA forms. The schedule for submittal of other documents and information is also discussed.

1/5/93 Transwestern resubmits RCRA Part A permit application using the EPA forms.

1/25/93 Transwestern notifies NMED that monitor wells will be installed to determine ground-water quality beneath the former surface impoundments.

2/7/93 Transwestern provides NMED with historical information on the use of the former surface impoundments.

2/17/93 Transwestern meets with NMED to discuss remediation and closure of the surface impoundment.

2/17/93 Transwestern requests permission from the State of New Mexico Office of the Commissioner of Public Lands to install two monitor wells on State Trust land in order to collect ground-water samples.

2/17/93 NMED requests that Transwestern submit a closure plan in accordance with the New Mexico Hazardous Waste Management Regulations, Part VI, Section 40 CFR 265.112(a). NMED also provides Transwestern with a list of Deficiency Comments related to NMED review of the RCRA Part A permit application previously submitted and requests that a new or amended Part A application be submitted within 30 days.

3/10/93 Transwestern requests NMED to grant a 60-day extension (until July 1, 1993) for filing the closure plan.

3/16/93 George Robinson (Cypress Engineering Services) meets with Larry Campbell (Transwestern) to discuss conclusions of Metric Report.

4/6/93 NMED grants extension for filing of closure plan.

4/7/93 Transwestern submits amended RCRA Part A permit application to NMED, along with a list of responses to NMED review comments on the previous permit application.

5/19/93 Larry Campbell and Lou Soldano (Transwestern) meet with NMED to discuss NMED request for closure plan for the surface impoundments. NMED requests information regarding the proposed installation of a product recovery pump.

5/21/93 Product recovery pump installed in MW-1. Interim corrective action begins by pumping product from MW-1 into aboveground storage tank.

6/11/93 Transwestern notifies the State of New Mexico Office of the Commissioner of Public Lands that remediation operations are in progress at the compressor station.

6/22/93 Brown & Root Environmental completes a report for Transwestern describing a ground-water assessment at the compressor station.

7/1/93 Larry Campbell (Transwestern) delivers closure plan to NMED. Transwestern begins free product recovery from recovery wells MW-1B, MW-2, and RW-1.

9/7/93 Transwestern notifies OCD of the installation of product recovery pumps in three monitor wells as part of ground-water cleanup and requests associated modifications to Discharge Plan GW-52.

9/22/93 OCD requests additional information regarding the design of the product recovery system prior to approving modifications to Discharge Plan GW-52.

10/25/93 Transwestern responds to comments from OCD regarding the product recovery system.

11/18/93 OCD approves Transwestern's proposed modifications to Discharge Plan GW-52 in accordance with ongoing remedial activities.

3/7/94 Transwestern receives a letter from NMED rejecting closure plan previously submitted on July 1, 1993, on the grounds that it is incomplete. NMED includes Notice of Deficiency listing items to be included in the closure plan.

3/23/94 Cypress Engineering Services removes inoperative product recovery pump from MW-1 and collects ground-water samples from MW-3 and MW-5.

4/5/94 George Robinson (Cypress Engineering Services) prepares letter report to Bill Kendrick (Enron Operations Corporation) discussing soil and ground-water quality at the Roswell compressor station.

4/8/94 Larry Campbell (Transwestern), Bill Kendrick (Enron Operations Corporation), and George Robinson (Cypress Engineering Services) meet with NMED to discuss Notice of Deficiency. NMED requests that another closure plan be submitted by June 1, 1994.

4/15/94 Brown & Caldwell installs new product recovery pump in MW-1 and measures depth to PSH and depth to ground water in MW-1, MW-1B, MW-2, and RW-1.

5/18/94 George Robinson (Cypress Engineering Services) and Jeffrey Forbes (DBS&A) meet with Marc Sides (NMED) to discuss closure plan format.

5/31/94 Closure Plan for Roswell Compressor Station Surface Impoundments submitted to NMED Hazardous and Radioactive Materials Bureau (HRMB).

OCD conducts joint inspection of with HRMB

8/4/94 Terry Davis, Marc Sides, and Cornelius Amindyas of the NMED meet with Larry Campbell (Transwestern), Bill Kendrick (Enron Operations Corporation), and George Robinson (Cypress Engineering Services) at the Roswell Station site to gather information for a RCRA Facility Assessment.

9/9/94 NMED HRMB delivers a copy of the RCRA Facility Assessment to David Neleigh, RCRA Permits Section Chief, EPA Region VI.

9/28/94 NMED HRMB issues Notice of Deficiency (NOD) to Transwestern for closure plan dated May 31, 1994, including a list of NMED comments and requests for additional information. NMED gives Transwestern 30 days to revise the closure plan in response to their comments.

11/1/94 Bill Kendrick (Enron Operations Corporation) and George Robinson (Cypress Engineering Services) meet with NMED to discuss Notice of Deficiency dated September 28, 1994. NMED requests that Transwestern (1) submit request for extension of the closure plan due date, (2) evaluate the potential to collect and analyze ground-water samples from off-site wells and the deep on-site well (TW-1), and (3) revise the closure plan in accordance with NMED comments.

11/9/94 Transwestern requests a 75-day extension of the due date for the revised closure plan. Included with the letter is an attachment describing the procedure and method for installation of an upgradient monitor well.

11/16/94 Transwestern submits to the NMED HRMB the first status report of interim corrective measures covering the month of October 1994.

11/28/94 Transwestern presents arguments for the continued use of the MW-1 phase separated hydrocarbon recovery well.

12/1/94 Transwestern installs upgradient monitor well MW-6 approximately 500 feet southwest of the former surface impoundments. A ground-water sample collected by DBS&A from this well is submitted for laboratory analysis in accordance with procedures outlined in Transwestern's letter dated November 9, 1994. All existing on-site monitor wells are resurveyed.

12/2/94 Clayton Barnhill and George Robinson accurately locate off-site wells using Magellen GPS Satellite Navigator.

12/16/94 Transwestern receives letter from NMED dated December 8, 1994, granting a 75-day extension of closure plan due date until January 16, 1995. Also included are NMED's comments on Transwestern's procedures and methods for installation of the upgradient monitor well.

12/20/94 Transwestern sends letter to NMED HRMB describing proposed ground-water sampling and analysis for off-site wells.

12/22/94 Ground-water samples are collected by DBS&A from on-site deep well TW-1 and off-site Well #5 for laboratory analysis of Appendix IX constituents.

1/3/95 NMED HRMB accepts Transwestern's arguments for the continued use of recovery well MW-1.

1/11/94 Transwestern submits to the NMED HRMB status report of interim corrective measures covering the fourth quarter 1994.

1/16/95 Transwestern submits revised closure plan to NMED HRMB.

2/21/95 NMED HRMB delivers a copy of the RCRA Facility Assessment to Larry Campbell (Transwestern).

3/30/95 Bill Kendrick (Enron Operations Corporation), George Robinson (Cypress Engineering Services), Jeff Forbes (Daniel B. Stephens & Associates), and Kathleen O'Rielly (an independent consultant) meet with Barbara Hoditschek, Ron Kern, Terry Davis, and Cornelius Amindyas of the NMED HRMB to discuss the technical deficiencies of the most recent closure plan. The NMED requests Transwestern to submit additional information regarding waste characterization. The NMED also indicates to Transwestern that the NMED will modify other parts of the closure plan the NMED finds deficient and then submit the modified closure plan for public notice.

3/31/95 Bill Kendrick (Enron Operations Corporation), and George Robinson (Cypress Engineering Services) meet with Roger Anderson (NMOCD) and Bill Olson (NMOCD) to discuss several ongoing investigation and remediation projects at Transwestern facilities including the Roswell Station. Mr. Anderson indicates that the NMED HRMB is not copying the NMOCD on correspondence.

4/28/95 Barbara Hoditschek (NMED) sends a letter to Larry Campbell (Transwestern) requesting additional information is provided for inclusion into the closure within seven days of receipt of the request.

5/1/95 Transwestern obtains the assistance of outside legal counsel to assist in an evaluation of the regulatory status of the Roswell Station facility and remediation activities.

5/10/95 Bill Kendrick (Enron Operations Corporation) in a letter to Barbara Hoditschek (NMED), responds to the NMED's 4/28/95 request.

5/30/95 Bill Kendrick (Enron Operations Corporation) in a letter to Barbara Hoditschek (NMED), presents a summary of the issues discussed during the 3/30/95 meeting.

6/1/95 Richard Virtue (Transwestern's outside legal counsel) in a letter to Tracy Hughes (NMED General Counsel), requests that the NMED General Counsel review the NMED HRMB's decision to require a RCRA permit for closure activities at the site.

6/20/95 Benito Garcia (NMED HRMB) in a letter to Larry Campbell (Transwestern), responds to Transwestern's 6/1/95 request for a review of NMED's decision to require a RCRA permit.

6/30/95 Bill Kendrick (Enron Operations Corporation) in a letter to Barbara Hoditschek (NMED), informs the NMED of Transwestern's intent to implement a self-directed Phase I Soil and Ground Water Assessment.

7/13/95 Barbara Hoditschek (NMED) sends a letter to Bill Kendrick (Enron Operations Corporation) transmitting a copy of the NMED modified closure plan. Comments are requested by 7/27/95.

7/26/95 Bill Kendrick (Enron Operations Corporation) in a letter to Barbara Hoditschek (NMED), transmits Transwestern's comments to the modified closure plan.

8/8/95 Bill Kendrick (Enron Operations Corporation), Lou Soldano (EOC Legal), Richard Virtue (EOC Outside Counsel), and George Robinson (CES) meet with Tracy Hughes (NMED General Counsel), Bonito Garcia (HRMB Bureau Chief), Ron Kern (HRMB Technical Compliance Program Manager), Teri Davis (NMED HRMB Technical Compliance), and Cornelius Amindyas (HRMB Permits) of the NMED to discuss TW's re-evaluation of regulatory status of the remediation activities. Transwestern agrees to provide a written statement and supporting information for TW's position that the former surface impoundments were not, nor ever were, hazardous waste management units.

8/22/95 OCD splits samples (ground water) from monitor wells & inspects of sampling operations of drilling Phase I assessment.

8/23/95 Daniel B. Stephens & Associates completes the Phase I Soil and Ground Water Assessment field activities in which soil samples were collected from the area of the former surface impoundments, three ground water monitor wells were installed downgradient of the former surface impoundments, and ground water samples were collected from three on-site and the three newly installed off-site monitor wells.

8/24/95 Cornelius Amindyas (HRMB Permits) of the NMED calls Bill Kendrick (Enron Operations Corporation) to request a target date for submittal of TW's written statement regarding regulatory status of the former surface impoundments. Bill Kendrick informs him that TW has set a target date of September 15, 1995.

7/26/95 TW submits (Phase I Soil & Groundwater Assessment work plan) to OCD ~~for approval~~ for approval

8/11/95 OCD conditionally approves TW's.

9/26/95 OCD sends TW & HRMB copies of OCD's 8/22/95 ground water analyses

11/9/95 TW submits Phase I Soil & Groundwater Assessment Report to OCD & ~~Report~~ and commits to send OCD a Phase II work plan by 12/10/95

10/26/95 TW submits request to dispose of investigation derived wastes to OCD

11/13/95 OCD conditionally approves of TW's request to dispose of investigation derived wastes.

12/19/95 TW submits Phase II Soil & Groundwater Assessment work plan to OCD

1/26/95 OCD requests HRMB comments on Phase I report and Phase II work plan

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502

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SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

December 21, 1995

Mr. Richard Virtue, Esq.
Taichert, Wiggins, Virtue & Najjar
119 East Marcy Street, Suite 100
P.O. Box 4265
Santa Fe, New Mexico 87502-4265

Re: Transwestern Pipeline Company (TPC)

Dear Mr. Virtue:

This letter responds to the position of Transwestern Pipeline Company (TPC) that the New Mexico Environment Department (NMED) is not the proper regulatory authority for closure of the surface impoundments at the Roswell Compressor Station. We have carefully considered your position and have concluded that at this time closure is required pursuant to the New Mexico Hazardous Waste Act (HWA). Further, as discussed below, we do not believe that closure under the authority of the New Mexico Oil Conservation Division (OCD) will achieve the same remediation goals or adequately protect human health and the environment.

As you are aware, TPC submitted three RCRA closure plans for the surface impoundments in question which NMED staff concluded were either incomplete or inaccurate. (see attached letters from NMED regarding Notices of Deficiencies). Based upon the available information, we must conclude that hazardous wastes were disposed of at the facility during the time period in question (including 100% 1,1,1 TCA) and that proper closure can only be accomplished pursuant to the HWA's requirements. Further, there is substantial ground water contamination at this site. Solvents have been detected at 22,400 times the New Mexico Water Quality Control Commission (WQCC) standard for 1,1 DCA and three times the WQCC standard for 1,1,1 TCA.

As a technical, legal or practical matter, we do not agree that cleanup under OCD standards would be equally protective of human health and the environment. TPC's position appears to be premised upon an assumption that no hazardous wastes or constituents were

disposed of at the surface impoundments in question. As stated, the facts of this site do not support this conclusion. Contrary to your position, there are significant differences between the cleanup criteria and goals under OCD and NMED. For example, cleanup required by NMED under the HWA involves health based standards and other media not addressed by OCD. Further, OCD does not oversee solvent plume characterization and cleanup of hazardous waste sites or other RCRA concerns.

This letter will confirm that NMED intends to issue the modified closure plan for public comment no later than January 31, 1996. If you have any additional information which supports the position of TPC, we would appreciate receiving it as soon as possible and prior to January 31, 1996. Specifically, we request any information such as manifests or other documentation which demonstrate that no hazardous wastes were disposed of at this facility. Further, we would appreciate any area photos of the surface impoundments taken during the time period in question.

If we do not receive any further information from TPC, we will proceed with public comment to avoid any further delay with cleanup at this site. We are confident that proper cleanup may be achieved through the regulatory oversight of NMED with, as necessary, the coordination of OCD. If you have any questions, do not hesitate to call.

Sincerely,

Susan M. McMichael

SUSAN M. McMICHAEL
Assistant General Counsel

Enclosure(s)

cc: Ed Kelley
Benito Garcia
Barbara Hoditscheck
Ron Kern
Bill Kendrick
Rodger Anderson
David Neleigh, EPA Region 6 (PD-N)

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

December 19, 1995

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Phase II Soil and Ground Water Assessment Plan
Roswell Compressor Station
Transwestern Pipeline Company

Dear Bill,

Enclosed for your review is a copy of the Phase II Soil and Ground Water Assessment Plan for the subject facility.

If you have any questions regarding this work plan, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

cc w/attachment: Barbara Hoditschek NMED HRMB Santa Fe, NM

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. Pacheco
Santa Fe, New Mexico 87505

November 13, 1995

CERTIFIED MAIL
RETURN RECEIPT NO: Z-765-962-511

Mr. Bill Kendrick
ENRON Operations Corp.
P.O. Box 1188
Houston, Texas 77251-1188

RE: TRANSWESTERN PIPELINE CO. ROSWELL COMPRESSOR STATION

Dear Mr. Kendrick:

The New Mexico Oil Conservation Division (OCD) has completed a review of Transwestern Pipeline Company's (TPC) October 26, 1995 "FINAL DISPOSITION OF INVESTIGATION DERIVED WASTES, TRANSWESTERN PIPELINE COMPANY ROSWELL COMPRESSOR STATION". This document contains TPC's request to dispose of soils and ground water from soil borings and ground water monitor wells either onsite or at a hazardous waste disposal facility. The disposal requests are based upon laboratory analytical sampling results.

The above referenced request is approved with the following conditions:

1. The analyses of soil cuttings from monitor wells MW-7, MW-7A, MW-8 and MW-9 show boring intervals containing metals well in excess of New Mexico Water Quality Control Commission (WQCC) ground water standards. Therefore, the OCD defers approval of TPC's disposal request for the soils from these monitor wells and requests that TPC provide the OCD with a revised disposal plan for these soils.

2. TPC will supply the OCD with the name and location of the hazardous waste disposal facility to which wastes are taken.

Please be advised that OCD approval does not relieve TPC of liability should their disposal actions result in actual pollution of ground water, surface water, or the environment. In addition, OCD approval does not relieve TPC of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs District
George Robinson, Cypress Engineering Services, Inc.

Z 765 962 511

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ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

November 9, 1995

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Phase I Soil and Ground Water Assessment Report
Roswell Compressor Station
Transwestern Pipeline Company

Dear Bill,

Enclosed is one copy of the subject report. We are currently in the process of developing a Phase II Soil and Ground Water Assessment Plan to further delineate affected soil and ground water at the site. A work plan for the Phase II Assessment will be submitted to your office for review and approval by December 15, 1995.

If you have any questions regarding the enclosed report, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
Manager, Projects Group

gcr/BK

xc: Tim Gum NMOCD Artesia District Office
Barbara Hoditschek NMED HRMB

ENRON ... 8 52
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

October 26, 1995

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Final Disposition of Investigation Derived Wastes
Transwestern Pipeline Company Roswell Compressor Station

Dear Bill,

During the course of the August 1995 subsurface assessment activities at the subject facility, several drums of potentially contaminated soil and ground water were collected from soil borings and ground water monitor wells. This water is currently stored at the site pending final disposition. The source, quantity, and proposed disposition of each drum is summarized below in Table 1. The proposed disposition is based on laboratory analysis of soil and ground water samples. A summary of the analytical results are attached. A copy of the laboratory reports will be included with the investigation summary report due to be submitted to your office by November 10, 1995.

Table 1. Source, quantity, and proposed disposition of investigation derived waste.

Source	Quantity	Proposed Disposition
Cuttings from off-site soil boring MW-7	five 55 gallon drums	Non-detect for VOCs and SVOCs; proposed disposition is to spread cuttings on ground surface within the facility fenceline
Cuttings from off-site soil boring MW-7A	four 55 gallon drums	Non-detect for VOCs and SVOCs; proposed disposition is to spread cuttings on ground surface within the facility fenceline
Cuttings from off-site soil boring MW-8	five 55 gallon drums	Non-detect for VOCs and SVOCs; proposed disposition is to spread cuttings on ground surface within the facility fenceline
Cuttings from off-site soil boring MW-9	five 55 gallon drums	Non-detect for VOCs and SVOCs; proposed disposition is to spread cuttings on ground surface within the facility fenceline
Cuttings from two soil borings located at the former Pit 2 location	one 55 gallon drum	Contains low concentrations of chlorinated compounds; due to unresolved issues associated with the regulatory status of the former surface impoundments and due to the small volume of waste involved, the proposed disposition is at a hazardous waste disposal facility
Cuttings from two soil borings located at the former Pit 1 location	one 55 gallon drum	Contains low concentrations of chlorinated compounds; due to unresolved issues associated with the regulatory status of the former surface impoundments and due to the small volume of waste involved, the proposed disposition is at a hazardous waste disposal facility

Purge water from ground water monitor well MW-3	≈ 25 gallons contained in one 55 gallon drum	Non-detect for VOCs and SVOCs; proposed disposition is to pour water on ground surface within the facility fenceline
Purge water from ground water monitor well MW-5	≈ 20 gallons contained in one 55 gallon drum	Non-detect for VOCs and SVOCs; proposed disposition is to pour water on ground surface within the facility fenceline
Purge water from ground water monitor well MW-6	≈ 20 gallons contained in one 55 gallon drum	Non-detect for VOCs and SVOCs; proposed disposition is to pour water on ground surface within the facility fenceline
Purge water from ground water monitor well MW-7	≈ 5 gallons contained in one 55 gallon drum	Non-detect for VOCs and SVOCs with the exception of detections for MEK and methyl methacrylate at low concentrations; neither detection represents either a characteristic or a potential listed hazardous waste, however, due to unresolved issues associated with the regulatory status of the former surface impoundments and due to the small volume of waste involved, the proposed disposition is to pour the water into one of the two drums of soil cuttings to be disposed of at a hazardous waste disposal facility
Purge water from ground water monitor well MW-8	≈ 20 gallons contained in one 55 gallon drum	Non-detect for VOCs and SVOCs with the exception of a detection for benzene at a concentration of 6 ppb; proposed disposition is to pour water on ground surface within the facility fenceline
Purge water from ground water monitor well MW-9	≈ 35 gallons contained in one 55 gallon drum	Non-detect for VOCs and SVOCs; proposed disposition is to pour water on ground surface within the facility fenceline

TPC, as operator of the subject facility, will implement the proposed disposition of investigation derived wastes upon review and approval by your office. If you have any questions regarding this proposal, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

xc: Barbara Hoditschek NMED HRMB Santa Fe, NM

Table 1. Summary of Analytical Results for Ground-Water Samples
Roswell Compressor Station No. 9
Page 1 of 8

Analyte	Monitor Well (Sample Date)					
	MW-3 (08/22/95)	MW-5 (08/22/95)	MW-6 (08/22/95)	MW-7 (08/23/95)	MW-8 (08/22/95)	MW-9 (08/23/95)
Volatile Organic Compounds (µg/L) by EPA Method 8240						
Acetone	<100	<100	<100	<100	<100	<100
Acetonitrile	<100	<100	<100	<100	<100	<100
Acrolein (propenal)	<50	<50	<50	<50	<50	<50
Acrylonitrile	<20	<20	<20	<20	<20	<20
Allyl chloride	<20	<20	<20	<20	<20	<20
Benzene	<5	<5	<5	<5	**6**	<5
Benzyl chloride	<5	<5	<5	<5	<5	<5
Bromobenzene	<5	<5	<5	<5	<5	<5
Bromochloromethane	<5	<5	<5	<5	<5	<5
Bromodichloromethane	<5	<5	<5	<5	<5	<5
Bromoform (tribromomethane)	<5	<5	<5	<5	<5	<5
Bromomethane	<10	<10	<10	<10	<10	<10
Methyl ethyl ketone (2-Butanone)	<100	<100	<100	**900**	<100	<100
Carbon disulfide	<5	<5	<5	<5	<5	<5
Carbon tetrachloride	<5	<5	<5	<5	<5	<5
Chlorobenzene	<5	<5	<5	<5	<5	<5
Chloroethane	<10	<10	<10	<10	<10	<10
2-Chloroethylvinyl ether	<5	<5	<5	<5	<5	<5
Chloroform (trichloromethane)	<5	<5	<5	<5	<5	<5
Chloromethane (methyl chloride)	<5	<5	<5	<5	<5	<5
2-Chloro-1,3-butadiene (chloroprene)	<5	<5	<5	<5	<5	<5
Dibromochloromethane (chlorodibromomethane)	<5	<5	<5	<5	<5	<5
1,2-Dibromo-3-chloropropane (DBCP)	<20	<20	<20	<20	<20	<20
1,2-Dibromoethane (EDB)	<20	<20	<20	<20	<20	<20
Dibromomethane (methylene bromide)	<5	<5	<5	<5	<5	<5
trans-1,4-Dichloro-2-butene	<50	<50	<50	<50	<50	<50
Dichlorodifluoromethane (Freon 12)	<10	<10	<10	<10	<10	<10
1,1-Dichloroethane (1,1-DCA)	<5	<5	<5	<5	<5	<5
1,2-Dichloroethane (ethylene chloride)	<5	<5	<5	<5	<5	<5

Bold values highlight concentrations above reporting limits

Table 1. Summary of Analytical Results for Ground-Water Samples
Roswell Compressor Station No. 9
Page 2 of 8

Analyte	Monitor Well (Sample Date)					
	MW-3 (08/22/95)	MW-5 (08/22/95)	MW-6 (08/22/95)	MW-7 (08/23/95)	MW-8 (08/22/95)	MW-9 (08/23/95)
1,1-Dichloroethene (vinylidene chloride)	<5	<5	<5	<5	<5	<5
cis-1,2-Dichloroethene	<5	<5	<5	<5	<5	<5
trans-1,2-Dichloroethene	<5	<5	<5	<5	<5	<5
1,2-Dichloropropane (propylene chloride)	<5	<5	<5	<5	<5	<5
cis-1,3-Dichloropropene	<5	<5	<5	<5	<5	<5
trans-1,3-Dichloropropene	<5	<5	<5	<5	<5	<5
Ethylbenzene	<5	<5	<5	<5	<5	<5
Ethyl methacrylate	<5	<5	<5	<5	<5	<5
2-Hexanone	<50	<50	<50	<50	<50	<50
Iodomethane	<5	<5	<5	<5	<5	<5
Isobutyl alcohol	<50	<50	<50	<50	<50	<50
Methylacrylonitrile	<50	<50	<50	<50	<50	<50
Methylene chloride (dichloromethane)	<5	<5	<5	<5	<5	<5
Methyl methacrylate	<5	<5	<5	**5**	<5	<5
4-Methyl-2-pentanone (MIBK)	<50	<50	<50	<50	<50	<50
Pentachloroethane	<5	<5	<5	<5	<5	<5
Propionitrile	<100	<100	<100	<100	<100	<100
Styrene	<5	<5	<5	<5	<5	<5
1,1,1,2-Tetrachloroethane (1,1,1,2-PCA)	<5	<5	<5	<5	<5	<5
1,1,2,2-Tetrachloroethane (1,1,2,2-PCA)	<5	<5	<5	<5	<5	<5
Tetrachloroethene (PCE)	<5	<5	<5	<5	<5	<5
Toluene	<5	<5	<5	<5	<5	<5
1,1,1-Trichloroethane (1,1,1-TCA)	<5	<5	<5	<5	<5	<5
1,1,2-Trichloroethane	<5	<5	<5	<5	<5	<5
Trichloroethene (TCE)	<5	<5	<5	<5	<5	<5
Trichlorofluoromethane (Freon 11)	<10	<10	<10	<10	<10	<10
1,2,3-Trichloropropane	<5	<5	<5	<5	<5	<5
Vinyl acetate	<50	<50	<50	<50	<50	<50
Vinyl chloride	<10	<10	<10	<10	<10	<10
Xylene(s)	<5	<5	<5	<5	<5	<5

Bold values highlight concentrations above reporting limits

Table 1. Summary of Analytical Results for Ground-Water Samples
Roswell Compressor Station No. 9
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Analyte	Monitor Well (Sample Date)					
	MW-3 (08/22/95)	MW-5 (08/22/95)	MW-6 (08/22/95)	MW-7 (08/23/95)	MW-8 (08/22/95)	MW-9 (08/23/95)
Semivolatile Organic Compounds (µg/L) by EPA Method 8270						
Acenaphthene	<10	<10	<10	<10	<10	<10
Acenaphthylene	<10	<10	<10	<10	<10	<10
Acetophenone (methyl phenyl ketone)	<10	<10	<10	<10	<10	<10
4-Aminobiphenyl	<10	<10	<10	<10	<10	<10
Aniline	<10	<10	<10	<10	<10	<10
Anthracene	<10	<10	<10	<10	<10	<10
Benzidine	<50	<50	<50	<50	<50	<50
Benzoic acid	<50	<50	<50	<50	<50	<50
Benzo(a)anthracene	<10	<10	<10	<10	<10	<10
Benzo(b)fluoranthene	<10	<10	<10	<10	<10	<10
Benzo(j)fluoranthene	<10	<10	<10	<10	<10	<10
Benzo(k)fluoranthene	<10	<10	<10	<10	<10	<10
Benzo(g,h,i)perylene	<10	<10	<10	<10	<10	<10
Benzo(a)pyrene	<10	<10	<10	<10	<10	<10
Benzyl alcohol (phenyl methanol)	<10	<10	<10	<10	<10	<10
Bis(2-chloroethoxy)methane	<10	<10	<10	<10	<10	<10
Bis(2-chloroethyl)ether	<10	<10	<10	<10	<10	<10
Bis(2-chloroisopropyl)ether	<10	<10	<10	<10	<10	<10
Bis(2-ethylhexyl)phthalate	<10	<10	<10	<10	<10	<10
4-Bromophenyl phenyl ether	<10	<10	<10	<10	<10	<10
Butyl benzyl phthalate	<10	<10	<10	<10	<10	<10
4-Chloroaniline	<10	<10	<10	<10	<10	<10
Chlorobenzilate	<10	<10	<10	<10	<10	<10
1-Chloronaphthalene	<10	<10	<10	<10	<10	<10
2-Chloronaphthalene	<10	<10	<10	<10	<10	<10
4-Chloro-3-methylphenol	<10	<10	<10	<10	<10	<10
2-Chlorophenol	<10	<10	<10	<10	<10	<10
4-Chlorophenyl phenyl ether	<10	<10	<10	<10	<10	<10
Chrysene	<10	<10	<10	<10	<10	<10

Bold values highlight concentrations above reporting limits

Table 1. Summary of Analytical Results for Ground-Water Samples
Roswell Compressor Station No. 9
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Analyte	Monitor Well (Sample Date)					
	MW-3 (08/22/95)	MW-5 (08/22/95)	MW-6 (08/22/95)	MW-7 (08/23/95)	MW-8 (08/22/95)	MW-9 (08/23/95)
Diallate	<10	<10	<10	<10	<10	<10
Dibenz(a,j)acridine	<10	<10	<10	<10	<10	<10
Dibenz(a,h)anthracene	<10	<10	<10	<10	<10	<10
Dibenzofuran	<10	<10	<10	<10	<10	<10
Di-n-butyl phthalate	<10	<10	<10	<10	<10	<10
1,2-Dichlorobenzene	<10	<10	<10	<10	<10	<10
1,3-Dichlorobenzene	<10	<10	<10	<10	<10	<10
1,4-Dichlorobenzene	<10	<10	<10	<10	<10	<10
3,3-Dichlorobenzidine	<20	<20	<20	<20	<20	<20
2,4-Dichlorophenol	<10	<10	<10	<10	<10	<10
2,6-Dichlorophenol	<10	<10	<10	<10	<10	<10
Diethyl phthalate	<10	<10	<10	<10	<10	<10
p-Dimethylaminoazobenzene	<10	<10	<10	<10	<10	<10
Phosphorodithionic acid (Dimethoate)	<20	<20	<20	<20	<20	<20
7,12-Dimethylbenz(a)anthracene	<10	<10	<10	<10	<10	<10
α-,α-Dimethylphenethylamine	<10	<10	<10	<10	<10	<10
2,4-Dimethylphenol	<10	<10	<10	<10	<10	<10
Dimethyl phthalate	<10	<10	<10	<10	<10	<10
2-Methyl-4,6-dinitrophenol	<50	<50	<50	<50	<50	<50
2,4-Dinitrophenol	<50	<50	<50	<50	<50	<50
2,4-Dinitrotoluene	<10	<10	<10	<10	<10	<10
2,6-Dinitrotoluene	<10	<10	<10	<10	<10	<10
Dinoseb (DNBP)	<20	<20	<20	<20	<20	<20
Di-n-octyl phthalate	<10	<10	<10	<10	<10	<10
Diphenylamine	<10	<10	<10	<10	<10	<10
1,2-Diphenylhydrazine	<10	<10	<10	<10	<10	<10
Disulfoton	<10	<10	<10	<10	<10	<10
Ethyl methane sulfonate	<20	<20	<20	<20	<20	<20
Fluoranthene	<10	<10	<10	<10	<10	<10
Fluorene	<10	<10	<10	<10	<10	<10

Bold values highlight concentrations above reporting limits

Table 1. Summary of Analytical Results for Ground-Water Samples
Roswell Compressor Station No. 9
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Analyte	Monitor Well (Sample Date)					
	MW-3 (08/22/95)	MW-5 (08/22/95)	MW-6 (08/22/95)	MW-7 (08/23/95)	MW-8 (08/22/95)	MW-9 (08/23/95)
Hexachlorobenzene	<10	<10	<10	<10	<10	<10
Hexachlorobutadiene	<10	<10	<10	<10	<10	<10
Hexachlorocyclopentadiene	<10	<10	<10	<10	<10	<10
Hexachloroethane (perchloroethane)	<10	<10	<10	<10	<10	<10
Hexachlorophene	<100	<100	<100	<100	<100	<100
Hexachloropropene	<10	<10	<10	<10	<10	<10
Indeno(1,2,3-cd)pyrene	<10	<10	<10	<10	<10	<10
Isodrin	<10	<10	<10	<10	<10	<10
Isophorone	<10	<10	<10	<10	<10	<10
Isosafrole	<10	<10	<10	<10	<10	<10
Kepone	<50	<50	<50	<50	<50	<50
Methapyrilene	<10	<10	<10	<10	<10	<10
3-Methylcholanthrene	<10	<10	<10	<10	<10	<10
Methyl methane sulfonate	<10	<10	<10	<10	<10	<10
2-Methylnaphthalene	<10	<10	<10	<10	<10	<10
3&4-Methylphenol (m&p-cresol)	<10	<10	<10	<10	<10	<10
2-Methylphenol (o-cresol)	<10	<10	<10	<10	<10	<10
Naphthalene	<10	<10	<10	<10	<10	<10
1,4-Naphthoquinone	<10	<10	<10	<10	<10	<10
1-Naphthylamine	<10	<10	<10	<10	<10	<10
2-Naphthylamine	<10	<10	<10	<10	<10	<10
2-Nitroaniline (o-Nitroaniline)	<50	<50	<50	<50	<50	<50
3-Nitroaniline (m-Nitroaniline)	<50	<50	<50	<50	<50	<50
4-Nitroaniline (p-Nitroaniline)	<50	<50	<50	<50	<50	<50
Nitrobenzene	<10	<10	<10	<10	<10	<10
2-Nitrophenol	<10	<10	<10	<10	<10	<10
4-Nitrophenol	<50	<50	<50	<50	<50	<50
4-Nitroquinoline-1-oxide	<10	<10	<10	<10	<10	<10
n-Nitrosodi-n-butylamine	<10	<10	<10	<10	<10	<10
n-Nitrosodiethylamine	<10	<10	<10	<10	<10	<10

Bold values highlight concentrations above reporting limits

Table 1. Summary of Analytical Results for Ground-Water Samples
Roswell Compressor Station No. 9
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Analyte	Monitor Well (Sample Date)					
	MW-3 (08/22/95)	MW-5 (08/22/95)	MW-6 (08/22/95)	MW-7 (08/23/95)	MW-8 (08/22/95)	MW-9 (08/23/95)
n-Nitrosomethylethylamine	<10	<10	<10	<10	<10	<10
n-Nitrosomorpholine	<10	<10	<10	<10	<10	<10
n-Nitrosodimethylamine	<10	<10	<10	<10	<10	<10
n-Nitrosodiphenylamine	<10	<10	<10	<10	<10	<10
n-Nitrosodi-n-propylamine	<10	<10	<10	<10	<10	<10
n-Nitrosopiperidine	<10	<10	<10	<10	<10	<10
n-Nitrosopyrolidine	<10	<10	<10	<10	<10	<10
5-Nitro-o-toluidine	<10	<10	<10	<10	<10	<10
Ethyl parathion	<10	<10	<10	<10	<10	<10
Pentachlorobenzene	<10	<10	<10	<10	<10	<10
Pentachloronitrobenzene	<10	<10	<10	<10	<10	<10
Pentachlorophenol	<50	<50	<50	<50	<50	<50
Phenacetin	<10	<10	<10	<10	<10	<10
Phenanthrene	<10	<10	<10	<10	<10	<10
Phenol (carbolic acid)	<10	<10	<10	<10	<10	<10
p-Phenylenediamine	<10	<10	<10	<10	<10	<10
Phorate	<10	<10	<10	<10	<10	<10
2-Picoline	<10	<10	<10	<10	<10	<10
Pronamide	<10	<10	<10	<10	<10	<10
Pyridine (azabenzene)	<10	<10	<10	<10	<10	<10
Pyrene	<10	<10	<10	<10	<10	<10
Safrole	<10	<10	<10	<10	<10	<10
1,2,4,5-Tetrachlorobenzene	<10	<10	<10	<10	<10	<10
2,3,4,6-Tetrachlorophenol	<10	<10	<10	<10	<10	<10
o-Toluidine	<10	<10	<10	<10	<10	<10
1,2,4-Trichlorobenzene	<10	<10	<10	<10	<10	<10
2,4,5-Trichlorophenol	<10	<10	<10	<10	<10	<10
2,4,6-Trichlorophenol	<10	<10	<10	<10	<10	<10
0,0,0-Triethyl phosphorothioate	<10	<10	<10	<10	<10	<10
1,3,5-Trinitrobenzene	<10	<10	<10	<10	<10	<10

Bold values highlight concentrations above reporting limits

Table 1. Summary of Analytical Results for Ground-Water Samples
Roswell Compressor Station No. 9
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Analyte	Monitor Well (Sample Date)					
	MW-3 (08/22/95)	MW-5 (08/22/95)	MW-6 (08/22/95)	MW-7 (08/23/95)	MW-8 (08/22/95)	MW-9 (08/23/95)
Organochlorine Pesticides/PCBs (µg/L) by EPA Method 8080						
Aldrin	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04
α-BHC (benzene hexachloride)	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03
β-BHC (benzene hexachloride)	<0.06	<0.06	<0.06	<0.06	<0.06	<0.06
δ-BHC (benzene hexachloride)	<0.09	<0.09	<0.09	<0.09	<0.09	<0.09
γ-BHC (benzene hexachloride)(Lindane)	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04
Chlordane	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14
4,4'-DDD	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11
4,4'-DDE	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04
4,4'-DDT	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12
Dieldrin	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
Endosulfan I	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14
Endosulfan II	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04
Endosulfan sulfate	<0.66	<0.66	<0.66	<0.66	<0.66	<0.66
Endrin	<0.06	<0.06	<0.06	<0.06	<0.06	<0.06
Endrin aldehyde	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23
Heptachlor	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03
Heptachlor epoxide	<0.83	<0.83	<0.83	<0.83	<0.83	<0.83
Methoxychlor	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8
Toxaphene	<2.4	<2.4	<2.4	<2.4	<2.4	<2.4
PCB-1016 (Aroclor-1016)	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
PCB-1221 (Aroclor-1221)	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
PCB-1232 (Aroclor-1232)	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
PCB-1242 (Aroclor-1242)	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
PCB-1248 (Aroclor-1248)	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
PCB-1254 (Aroclor-1254)	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
PCB-1260 (Aroclor-1260)	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
Metals[1] (mg/L) by EPA Methods 6010 and 7470 (for Mercury)						
Aluminum (Al)	**0.24**	**0.38**	**0.69**	**1.39**	**0.33**	**3.13**
Antimony (Sb)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1

Bold values highlight concentrations above reporting limits

[1] *Total metal concentrations determined on unfiltered samples*

Table 1. Summary of Analytical Results for Ground-Water Samples
Roswell Compressor Station No. 9
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Analyte	Monitor Well (Sample Date)					
	MW-3 (08/22/95)	MW-5 (08/22/95)	MW-6 (08/22/95)	MW-7 (08/23/95)	MW-8 (08/22/95)	MW-9 (08/23/95)
Arsenic (As)	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Barium (Ba)	<0.01	<0.01	<0.01	**0.02**	<0.01	**0.04**
Beryllium (Be)	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Cadmium (Cd)	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Chromium (Cr)	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Cobalt (Co)	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03
Copper (Cu)	<0.01	<0.01	<0.01	<0.01	<0.01	**0.01**
Lead (Pb)	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Mercury (Hg)	**0.0002**	<0.0002	**0.0005**	**0.0004**	**0.0003**	**0.0005**
Nickel (Ni)	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04
Selenium (Se)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Silver (Ag)	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Thallium (Tl)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Tin (Sn)	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Vanadium (V)	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Zinc (Zn)	**0.03**	**0.01**	**0.03**	**0.02**	**0.01**	**0.03**
Indicator Parameters (mg/L) *(EPA methods shown in parentheses)*						
Bicarbonate (EPA 2320B)	**142**	**149**	**134**	**166**	**163**	**151**
Carbonate (EPA 2320B)	<1	<1	<1	<1	<1	<1
Hydroxide (EPA 2320B)	<1	<1	<1	<1	<1	<1
Calcium (EPA 6010)	**587**	**623**	**458**	**668**	**587**	**896**
Chloride (EPA 325.2)	**405**	**574**	**344**	**284**	**362**	**391**
Cyanide (EPA 9010)	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
Magnesium (EPA 6010)	**136**	**145**	**148**	**235**	**193**	**232**
Nitrate + nitrite as N (EPA 353.2)	**0.80**	**3.10**	**1.00**	**0.12**	**0.10**	**0.38**
Potassium (EPA 6010)	**3.2**	**3.8**	**3.9**	**8.2**	**3.7**	**17**
Sodium (EPA 6010)	**215**	**204**	**124**	**149**	**117**	**230**
Sulfate (EPA 375.2)	**1,800**	**1,800**	**1,600**	**2,000**	**2,000**	**2,200**
Sulfide (EPA 376.2)	<0.05	<0.05	<0.05	**0.08**	<0.05	**0.10**
Total alkalinity (as $CaCO_3$) (EPA 310.1)	**116**	**122**	**110**	**136**	**134**	**124**
Total dissolved solids (EPA 160.1)	**3,650**	**3,440**	**2,800**	**3,640**	**3,640**	**4,060**

Bold values highlight concentrations above reporting limits

Table 2. Summary of Analytical Results for Soil Samples from Off-Site Soil Borings
Roswell Compressor Station No. 9
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Analyte	Sample No. (Sample Date)												
	MW-7 10-12' (08/22/95)	MW-7 30-32' (08/22/95)	MW-7 40-42' (08/22/95)	MW-7 50-52' (08/22/95)	MW-7 70-72' (08/22/95)	MW-7ABD 5-10' (08/15/95)	MW-7ABD 40-42' (08/15/95)	MW-7ABD 60-62' (08/15/95)	MW-8 10' (08/16/95)	MW-8 65' (08/16/95)	MW-9 10' (08/16/95)	MW-9 40-42' (08/16/95)	MW-9 60-62' (08/22/95)
Volatile Organic Compounds (µg/kg) by EPA Method 8240													
Acetone	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100
Acetonitrile	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100
Acrolein (propenal)	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Acrylonitrile	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20
Allyl chloride	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20	<20
Benzene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Benzyl chloride	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Bromobenzene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Bromochloromethane	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Bromodichloromethane	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Bromoform (tribromomethane)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Bromomethane	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Methyl ethyl ketone (2-Butanone)	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100
Carbon disulfide	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Carbon tetrachloride	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Chlorobenzene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Chloroethane	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
2-Chloroethylvinyl ether	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Chloroform (trichloromethane)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Chloromethane (methyl chloride)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
2-Chloro-1,3-butadiene (chloroprene)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5

B = Analyte also present in method blank
Bold values highlight concentrations above reporting limits

J:\4115\TABLES\SOIL-RES.095

Table 2. Summary of Analytical Results for Soil Samples from Off-Site Soil Borings
Roswell Compressor Station No. 9
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Analyte	Sample No. (Sample Date)												
	MW-7 10-12' (08/22/95)	MW-7 30-32' (08/22/95)	MW-7 40-42' (08/22/95)	MW-7 50-52' (08/22/95)	MW-7 70-72' (08/22/95)	MW-7ABD 5-10' (08/15/95)	MW-7ABD 40-42' (08/15/95)	MW-7ABD 60-62' (08/15/95)	MW-8 10' (08/16/95)	MW-8 65' (08/16/95)	MW-9 10' (08/16/95)	MW-9 40-42' (08/16/95)	MW-9 60-62' (08/22/95)
Dibromochloromethane (chlorodibromomethane)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,2-Dibromo-3-chloropropane (DBCP)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,2-Dibromoethane (EDB)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Dibromomethane (methylene bromide)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
trans-1,4-Dichloro-2-butene	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Dichlorodifluoromethane (Freon 12)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
1,1-Dichloroethane (1,1-DCA)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,2-Dichloroethane (ethylene chloride)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,1-Dichloroethene (vinylidene chloride)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
cis-1,2-Dichloroethene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
trans-1,2-Dichloroethene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,2-Dichloropropane (propylene chloride)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
cis-1,3-Dichloropropene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
trans-1,3-Dichloropropene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Ethylbenzene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Ethyl methacrylate	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
2-Hexanone	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Iodomethane	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Isobutyl alcohol	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Methylacrylonitrile	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Methylene chloride (dichloromethane)	**6 B**	**7 B**	**8 B**	**8 B**	**9 B**	<5	<5	<5	<5	<5	<5	<5	**10 B**
Methyl methacrylate	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5

B = Analyte also present in method blank
Bold values highlight concentrations above reporting limits

J:\4115\TABLES\SOIL-RES.C95

Table 2. Summary of Analytical Results for Soil Samples from Off-Site Soil Borings
Roswell Compressor Station No. 9
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Analyte	Sample No. (Sample Date)												
	MW-7 10-12' (08/22/95)	MW-7 30-32' (08/22/95)	MW-7 40-42' (08/22/95)	MW-7 50-52' (08/22/95)	MW-7 70-72' (08/22/95)	MW-7ABD 5-10' (08/15/95)	MW-7ABD 40-42' (08/15/95)	MW-7ABD 60-62' (08/15/95)	MW-8 10' (08/16/95)	MW-8 65' (08/16/95)	MW-9 10' (08/16/95)	MW-9 40-42' (08/16/95)	MW-9 60-62' (08/22/95)
4-Methyl-2-pentanone (MIBK)	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Pentachloroethane	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Propionitrile	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100	<100
Styrene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,1,1,2-Tetrachloroethane (1,1,1,2-PCA)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,1,2,2-Tetrachloroethane (1,1,2,2-PCA)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Tetrachloroethene (PCE)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Toluene	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,1,1-Trichloroethane (1,1,1-TCA)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
1,1,2-Trichloroethane	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Trichloroethene (TCE)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Trichlorofluoromethane (Freon 11)	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
1,2,3-Trichloropropane	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Vinyl acetate	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Vinyl chloride	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10
Xylene(s)	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5	<5
Metals (mg/kg) by EPA Methods 6010 and 7471 (for Mercury)													
Arsenic (As)	<5	<5	<5	7	12	<5	8	5	<5	<5	8	12	14
Barium (Ba)	301	48	30	157	102	319	210	165	95	8	151	176	76
Chromium (Cr)	6	11	9	19	16	7	16	14	8	5	7	13	15
Lead (Pb)	<5	6	5	6	11	<5	18	8	<5	<5	<5	5	5
Mercury (Hg)	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	0.42	0.12	<0.10	<0.10	<0.10	<0.10

B = Analyte also present in method blank
Bold values highlight concentrations above reporting limits

J:\4115\TABLES\SOIL-RES.095

Table 3. Summary of Analytical Results for Pit Soil Samples
Roswell Compressor Station No. 9
Page 1 of 7

Analyte	Sample No. (Sample Date)			
	Pit 1 NW Boring (08/18/95)	Pit 1 SE Boring (08/18/95)	Pit 2 NE Boring (08/17/95)	Pit 2 SW Boring (08/18/95)
Volatile Organic Compounds (µg/kg) by EPA Method 8240				
Acetone	**1,400**	<500	<500	<100
Acetonitrile	<500	<500	<500	<100
Acrolein (propenal)	<200	<200	<200	<50
Acrylonitrile	<100	<100	<100	<20
Allyl chloride	<100	<100	<100	<20
Benzene	**210**	**850**	**140**	<5
Benzyl chloride	<20	<20	<20	<5
Bromobenzene	<20	<20	<20	<5
Bromochloromethane	<20	<20	<20	<5
Bromodichloromethane	<20	<20	<20	<5
Bromoform (tribromomethane)	<20	<20	<20	<5
Bromomethane	<50	<50	<50	<10
Methyl ethyl ketone (2-Butanone)	<500	<500	<500	<100
Carbon disulfide	<20	**60**	<20	<5
Carbon tetrachloride	<20	<20	<20	<5
Chlorobenzene	<20	<20	<20	<5
Chloroethane	<50	<50	<50	<10
2-Chloroethylvinyl ether	<20	<20	<20	<5
Chloroform (trichloromethane)	<20	<20	<20	<5
Chloromethane (methyl chloride)	<20	<20	<20	<5
2-Chloro-1,3-butadiene (chloroprene)	<20	<20	<20	<5
Dibromochloromethane (chlorodibromomethane)	<20	<20	<20	<5
1,2-Dibromo-3-chloropropane (DBCP)	<20	<20	<20	<5
1,2-Dibromoethane (ethylene dibromide)	<20	<20	<20	<5
Dibromomethane (methylene bromide)	<20	<20	<20	<5
trans-1,4-Dichloro-2-butene	<200	<200	<200	<50
Dichlorodifluoromethane (Freon 12)	<50	<50	<50	<10
1,1-Dichloroethane (1,1-DCA)	**1,000**	**1,200**	<20	<5
1,2-Dichloroethane (ethylene chloride)	<20	<20	<20	<5

Bold values highlight concentrations above reporting limits

Table 3. Summary of Analytical Results for Pit Soil Samples
Roswell Compressor Station No. 9
Page 2 of 7

Analyte	Sample No. (Sample Date)			
	Pit 1 NW Boring (08/18/95)	Pit 1 SE Boring (08/18/95)	Pit 2 NE Boring (08/17/95)	Pit 2 SW Boring (08/18/95)
1,1-Dichloroethene (vinylidene chloride)	**40**	**40**	<20	<5
cis-1,2-dichloroethene	<20	<20	<20	<5
trans-1,2-Dichloroethene	<20	<20	<20	<5
1,2-Dichloropropane (propylene chloride)	<20	<20	<20	<5
cis-1,3-Dichloropropene	<20	<20	<20	<5
trans-1,3-Dichloropropene	<20	<20	<20	<5
Ethylbenzene	**40**	**370**	**900**	<5
Ethyl methacrylate	<20	<20	<20	<5
2-Hexanone	<20	**460**	<20	<5
Iodomethane	<20	<20	<20	<5
Isobutyl alcohol	<200	<200	<200	<50
Methylacrylonitrile	<200	<200	<200	<50
Methylene chloride (dichloromethane)	<20	**160**	<20	<5
Methyl methacrylate	<20	<20	<20	<5
4-Methyl-2-pentanone (MIBK)	<200	<200	<200	<50
Pentachloroethane	<20	<20	<20	<5
Propionitrile	<500	<500	<500	<100
Styrene	<20	<20	<20	<5
1,1,1,2-Tetrachloroethane (1,1,1,2-PCA)	<20	<20	<20	<5
1,1,2,2-Tetrachloroethane (1,1,2,2-PCA)	<20	<20	<20	<5
Tetrachloroethene (PCE)	<20	**40**	<20	**9**
Toluene	**500**	**9,100**	**1,900**	<5
1,1,1-Trichloroethane (1,1,1-TCA)	**1,900**	**16,000**	<20	**17**
1,1,2-Trichloroethane	<20	<20	<20	<5
Trichloroethene (TCE)	<20	<20	<20	<5
Trichlorofluoromethane (Freon 11)	<50	<50	<50	<10
1,2,3-Trichloropropane	<20	<20	<20	<5
Vinyl acetate	**200**	**7,000**	<6,000	<50
Vinyl chloride	<50	<50	<50	<10
Xylene(s)	**270**	**2,400**	**16,000**	<5

Bold values highlight concentrations above reporting limits

Table 3. Summary of Analytical Results for Pit Soil Samples
Roswell Compressor Station No. 9
Page 3 of 7

Analyte	Sample No. (Sample Date)			
	Pit 1 NW Boring (08/18/95)	Pit 1 SE Boring (08/18/95)	Pit 2 NE Boring (08/17/95)	Pit 2 SW Boring (08/18/95)
Semivolatile Organic Compounds (µg/kg) by EPA Method 8270				
Acenaphthene	<3,300	<3,300	<330	<330
Acenaphthylene	<3,300	<3,300	<330	<330
Acetophenone (methyl phenyl ketone)	<3,300	<3,300	<330	<330
4-Aminobiphenyl	<3,300	<3,300	<330	<330
Aniline	<3,300	<3,300	<330	<330
Anthracene	<3,300	<3,300	<330	<330
Benzidine	<16,500	<16,500	<1,650	<1,650
Benzoic acid	<16,500	<16,500	<1,650	<1,650
Benzo(a)anthracene	<3,300	<3,300	<330	<330
Benzo(b)fluoranthene	<3,300	<3,300	<330	<330
Benzo(j)fluoranthene	<3,300	<3,300	<330	**330**
Benzo(k)fluoranthene	<3,300	<3,300	<330	<330
Benzo(g,h,i)perylene	<3,300	<3,300	<330	<330
Benzo(a)pyrene	<3,300	<3,300	<330	<330
Benzyl alcohol (phenyl methanol)	<6,600	<6,600	<660	<660
Bis(2-chloroethoxy)methane	<3,300	<3,300	<330	<330
Bis(2-chloroethyl)ether	<3,300	<3,300	<330	<330
Bis(2-chloroisopropyl)ether	<3,300	<3,300	<330	<330
Bis(2-ethylhexyl)phthalate	**4,800**	<3,300	<330	<330
4-Bromophenyl phenyl ether	<3,300	<3,300	<330	<330
Butyl benzyl phthalate	<3,300	<3,300	<330	<330
4-Chloroaniline	<3,300	<3,300	<330	<330
Chlorobenzilate	<3,300	<3,300	<330	<330
1-Chloronaphthalene	<3,300	<3,300	<330	<330
2-Chloronaphthalene	<3,300	<3,300	<330	<330
4-Chloro-3-methylphenol	<3,300	<3,300	<330	<330
2-Chlorophenol	<3,300	<3,300	<330	<330
4-Chlorophenyl phenyl ether	<3,300	<3,300	<330	<330
Chrysene	<3,300	<3,300	<330	**330**

Bold values highlight concentrations above reporting limits

Table 3. Summary of Analytical Results for Pit Soil Samples
Roswell Compressor Station No. 9
Page 4 of 7

Analyte	Sample No. (Sample Date)			
	Pit 1 NW Boring (08/18/95)	Pit 1 SE Boring (08/18/95)	Pit 2 NE Boring (08/17/95)	Pit 2 SW Boring (08/18/95)
Diallate	<3,300	<3,300	<330	<330
Dibenz(a,j)acridine	<3,300	<3,300	<330	<330
Dibenz(a,h)anthracene	<3,300	<3,300	<330	<330
Dibenzofuran	<3,300	<3,300	<330	<330
Di-n-butyl phthalate	<3,300	<3,300	<330	<330
1,2-Dichlorobenzene	<3,300	<3,300	<330	<330
1,3-Dichlorobenzene	<3,300	<3,300	<330	<330
1,4-Dichlorobenzene	<3,300	<3,300	<330	<330
3,3-Dichlorobenzidine	<3,300	<3,300	<330	<330
2,4-Dichlorophenol	<3,300	<3,300	<330	<330
2,6-Dichlorophenol	<3,300	<3,300	<330	<330
Diethyl phthalate	<3,300	<3,300	<330	<330
p-Dimethylaminoazobenzene	<3,300	<3,300	<330	<330
Phosphorodithionic acid (Dimethoate)	<6,600	<6,600	<660	<660
7,12-Dimethylbenz(a)anthracene	<3,300	<3,300	<330	<330
α-,α-Dimethylphenethylamine	<3,300	<3,300	<330	<330
2,4-Dimethylphenol	<3,300	<3,300	<330	<330
Dimethyl phthalate	<3,300	<3,300	<330	<330
2-Methyl-4,6-dinitrophenol	<16,500	<16,500	<1,650	<1,650
2,4-Dinitrophenol	<16,500	<16,500	<1,650	<1,650
2,4-Dinitrotoluene	<3,300	<3,300	<330	<330
2,6-Dinitrotoluene	<3,300	<3,300	<330	<330
Dinoseb (DNBP)	<3,300	<3,300	<330	<330
Di-n-octyl phthalate	<3,300	<3,300	<330	<330
Diphenylamine	<3,300	<3,300	<330	<330
1,2-Diphenylhydrazine	<3,300	<3,300	<330	<330
Disulfoton	<3,300	<3,300	<330	<330
Ethyl methane sulfonate	<3,300	<3,300	<330	<330
Fluoranthene	<3,300	<3,300	<330	**760**
Fluorene	<3,300	<3,300	<330	<330

Bold values highlight concentrations above reporting limits

Table 3. Summary of Analytical Results for Pit Soil Samples
Roswell Compressor Station No. 9
Page 5 of 7

Analyte	Sample No. (Sample Date)			
	Pit 1 NW Boring (08/18/95)	Pit 1 SE Boring (08/18/95)	Pit 2 NE Boring (08/17/95)	Pit 2 SW Boring (08/18/95)
Hexachlorobenzene	<3,300	<3,300	<330	<330
Hexachlorobutadiene	<3,300	<3,300	<330	<330
Hexachlorocyclopentadiene	<3,300	<3,300	<330	<330
Hexachloroethane (perchloroethane)	<3,300	<3,300	<330	<330
Hexachlorophene	<3,300	<3,300	<330	<330
Hexachloropropene	<3,300	<3,300	<330	<330
Indeno(1,2,3-cd)pyrene	<3,300	<3,300	<330	<330
Isodrin	<3,300	<3,300	<330	<330
Isophorone	<3,300	<3,300	<330	<330
Isosafrole	<3,300	<3,300	<330	<330
Kepone	<16,500	<16,500	<1,650	<1,650
Methapyrilene	<3,300	<3,300	<330	<330
3-Methylcholanthrene	<3,300	<3,300	<330	<330
Methyl methane sulfonate	<3,300	<3,300	<330	<330
2-Methylnaphthalene	**4,800**	<3,300	**460**	<330
3&4-Methylphenol (m&p-cresol)	<3,300	<3,300	<330	<330
2-Methylphenol (o-cresol)	<3,300	<3,300	<330	<330
Naphthalene	<3,300	<3,300	<330	<330
1,4-Naphthoquinone	<3,300	<3,300	<330	<330
1-Naphthylamine	<3,300	<3,300	<330	<330
2-Naphthylamine	<3,300	<3,300	<330	<330
2-Nitroaniline (o-Nitroaniline)	<16,500	<16,500	<1,650	<1,650
3-Nitroaniline (m-Nitroaniline)	<16,500	<16,500	<1,650	<1,650
4-Nitroaniline (p-Nitroaniline)	<16,500	<16,500	<1,650	<1,650
Nitrobenzene	<3,300	<3,300	<330	<330
2-Nitrophenol	<3,300	<3,300	<330	<330
4-Nitrophenol	<16,500	<16,500	<1,650	<1,650
4-Nitroquinoline-1-oxide	<3,300	<3,300	<330	<330
n-Nitrosodi-n-butylamine	<3,300	<3,300	<330	<330
n-Nitrosodiethylamine	<3,300	<3,300	<330	<330

Bold values highlight concentrations above reporting limits

Table 3. Summary of Analytical Results for Pit Soil Samples
Roswell Compressor Station No. 9
Page 6 of 7

Analyte	Sample No. (Sample Date)			
	Pit 1 NW Boring (08/18/95)	Pit 1 SE Boring (08/18/95)	Pit 2 NE Boring (08/17/95)	Pit 2 SW Boring (08/18/95)
n-Nitrosomethylethylamine	<3,300	<3,300	<330	<330
n-Nitrosomorpholine	<3,300	<3,300	<330	<330
n-Nitrosodimethylamine	<3,300	<3,300	<330	<330
n-Nitrosodiphenylamine	<3,300	<3,300	<330	<330
n-Nitrosodi-n-propylamine	<3,300	<3,300	<330	<330
n-Nitrosopiperidine	<3,300	<3,300	<330	<330
n-Nitrosopyrolidine	<3,300	<3,300	<330	<330
5-Nitro-o-toluidine	<3,300	<3,300	<330	<330
Ethyl parathion	<3,300	<3,300	<330	<330
Pentachlorobenzene	<3,300	<3,300	<330	<330
Pentachloronitrobenzene	<3,300	<3,300	<330	<330
Pentachlorophenol	<16,500	<16,500	<1,650	<1,650
Phenacetin	<3,300	<3,300	<330	<330
Phenanthrene	**5,600**	**5,000**	<330	**450**
Phenol (carbolic acid)	**30,000**	**200,000**	<330	<330
p-Phenylenediamine	<3,300	<3,300	<330	<330
Phorate	<3,300	<3,300	<330	<330
2-Picoline	<3,300	<3,300	<330	<330
Pronamide	<3,300	<3,300	<330	<330
Pyridine (azabenzene)	<3,300	<3,300	<330	<330
Pyrene	<3,300	<3,300	<330	**890**
Safrole	<3,300	<3,300	<330	<330
1,2,4,5-Tetrachlorobenzene	<3,300	<3,300	<330	<330
2,3,4,6-Tetrachlorophenol	<3,300	<3,300	<330	<330
o-Toluidine	<3,300	<3,300	<330	<330
1,2,4-Trichlorobenzene	<3,300	<3,300	<330	<330
2,4,5-Trichlorophenol	<3,300	<3,300	<330	<330
2,4,6-Trichlorophenol	<3,300	<3,300	<330	<330
0,0,0-Triethyl phosphorothioate	<3,300	<3,300	<330	<330
1,3,5-Trinitrobenzene	<3,300	<3,300	<330	<330

Bold values highlight concentrations above reporting limits

Table 3. Summary of Analytical Results for Pit Soil Samples
Roswell Compressor Station No. 9
Page 7 of 7

Analyte	Sample No. (Sample Date)			
	Pit 1 NW Boring (08/18/95)	Pit 1 SE Boring (08/18/95)	Pit 2 NE Boring (08/17/95)	Pit 2 SW Boring (08/18/95)
PCBs (µg/kg) by EPA Method 8080				
PCB-1016 (Aroclor-1016)	<1,700	<1,700	<1,700	<17
PCB-1221 (Aroclor-1221)	<1,700	<1,700	<1,700	<17
PCB-1232 (Aroclor-1232)	<1,700	<1,700	<1,700	<17
PCB-1242 (Aroclor-1242)	<1,700	<1,700	<1,700	<17
PCB-1248 (Aroclor-1248)	<1,700	<1,700	<1,700	<17
PCB-1254 (Aroclor-1254)	<1,700	<1,700	<1,700	<17
PCB-1260 (Aroclor-1260)	<1,700	<1,700	<1,700	<17
PCB-1262 (Aroclor-1262)	<1,700	<1,700	<1,700	<17
PCB-1268 (Aroclor-1268)	<1,700	<1,700	<1,700	<17
Metals (mg/kg) by EPA Methods 6010 and 7471 (for Mercury)				
Aluminum (Al)	**5,950**	**1,690**	**1,430**	**1,630**
Antimony (Sb)	**10**	<10	<10	<10
Arsenic (As)	**9**	**17**	**6**	<5
Barium (Ba)	**415**	**171**	**233**	**734**
Beryllium (Be)	<0.5	<0.5	**0.5**	<0.5
Cadmium (Cd)	<0.5	<0.5	<0.5	<0.5
Chromium (Cr)	**9**	**9**	**8**	**7**
Cobalt (Co)	<3	<3	<3	<3
Copper (Cu)	**144**	**337**	**56**	**18**
Lead (Pb)	<5	**11**	<5	<5
Mercury (Hg)	**0.59**	**1.36**	<0.10	<0.10
Nickel (Ni)	**9**	**5**	**5**	<4
Selenium (Se)	<10	<10	<10	**10**
Silver (Ag)	<1	<1	<1	<1
Thallium (Tl)	<10	<10	<10	<10
Tin (Sn)	<5	**6**	**5**	<5
Vanadium (V)	**14**	**10**	**21**	**11**
Zinc (Zn)	**97**	**282**	**45**	**34**
Miscellaneous (mg/kg) by EPA Methods 9010, 9030, and 418.1, respectively				
Total cyanide	**1.1**	**1.4**	<0.4	<0.4
Total sulfide	**1,800**	**940**	**530**	**370**
Total petroleum hydrocarbons	**4,700**	**26,000**	**5,300**	<50

Bold values highlight concentrations above reporting limits

ENRON
OPERATIONS CORP.

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October 20, 1995

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Phase I Soil and Ground Water Assessment Report
Roswell Compressor Station
Transwestern Pipeline Company

Dear Bill,

The purpose of this letter is to inform your office that the subject report will be submitted to your office for review by November 10, 1995.

Please contact me at (713) 646-7644 or George Robinson at (713) 646-7327 if this schedule presents a problem.

Sincerely,

Bill Kendrick

Bill Kendrick
Manager, Projects Group

gcr/BK

xc: Barbara Hoditschek NMED HRMB Santa Fe, NM

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October 11, 1995

BY HAND-DELIVERY

Tracy Hughes, Esq.
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Santa Fe, NM 87502

Transwestern Pipeline Company
("TW"), Roswell Compressor Station
("Roswell Station")

Dear Ms. Hughes:

This letter follows the August, 1995 meeting between representatives of TW and representatives of the New Mexico Environment Department ("NMED") concerning TW's Roswell Compressor Station. This confirms the information provided orally by TW to NMED at the meeting, and provides additional information as requested by the NMED.

Summary of TW's Analysis

For legal, technical and policy reasons, the proper regulatory path for the closure of this site is through the New Mexico Oil Conservation Division ("OCD") rather than NMED. TW remains committed to remedial goals that are fully protective of human health and the environment. Closure under the OCD authority will expedite the remediation and avoid the difficulties inherent under a RCRA Subtitle C closure, which is ill-suited for this type of facility. Moreover, closure under the OCD will not only achieve the same remediation goals as those prescribed under RCRA, but also place oversight authority with the state agency that has primary authority and expertise over remediation of soil and groundwater contaminated with petroleum hydrocarbons which comprise nearly all of the contaminants at the Roswell Station.

Since the meeting held between TW and NMED in March, 1995, TW has conducted a comprehensive review and analysis of the status of

the Roswell Station and the regulatory approach imposed upon this facility. The results of TW's analysis show that the Part A application filed by TW in 1993 at the request of NMED contained fundamentally erroneous information and should be withdrawn. TW's investigation of its past practices at both the Roswell Station and other sites indicates that the wastes generated at the Roswell Station were never "hazardous" waste within the meaning of RCRA for a number of reasons. First, the wastes were in insufficient amounts or concentrations to qualify as hazardous under the regulations then in effect. Second, some of the materials released were not even classified as hazardous wastes under the then existing regulations. Finally, the application assumed the presence of certain wastes for which no evidence has been found to exist. Moreover, facility wastes were released during the time period prior to clarification of the "petroleum" exemption and were generally considered to be exempt pursuant to the petroleum exemption at the time of disposal.

Although the OCD is the appropriate oversight authority, TW can provide NMED with copies of documentation related to the OCD remediation process so that NMED may assure itself that the process is adequate to protect human health and the environment.

General Description of Roswell Station Operations and Potential Waste Streams

The Roswell Station is located on approximately 80 acres of land just north of the City of Roswell. The natural gas compressor station has been in operation since 1960, and the station operates subject to a discharge plan issued by the OCD. TW filed a RCRA Part A application in January, 1993, at the request of NMED for the purpose of gathering information concerning closure of former surface impoundments at the facility.

TW's investigation indicates that two surface impoundments were used at the facility from 1960 through 1983. One of these surface impoundments was backfilled before February, 1977, and the second was closed in 1983 and backfilled in June, 1986. These surface impoundments were used by TW to contain pipeline condensate. The surface impoundments have been replaced by above-ground storage tanks. All wastes generated from operations are now stored in the surface tanks and then removed from the site and handled in such a manner so that no treatment, storage or disposal facility ("TSDF") status is triggered. Thus, the surface impoundments that are the subject of the Part A application and subsequent negotiations with NMED have not been in use since at least 1983 and have been replaced by above-ground storage facilities.

TW's Roswell Station, like hundreds of similar facilities located within the State of New Mexico, serves the function of compressing natural gas for transportation through a pipeline. A secondary function of the Roswell Station is to serve as a location where pipeline liquids are removed from the pipeline. These liquids collect in low spots in the pipeline or in flow-through vessels designed to knock out the liquids ("scrubbers"). Liquids are also periodically removed from the pipeline during "pigging" operations. During pigging operations, plugs or "pigs" are shoved through the pipeline to push out the liquids. The liquids collected at a compressor station from "pigging" operations and the scrubbers are called pipeline liquids or "condensate".

In general, pipeline liquids are a mixture of produced water and petroleum hydrocarbons. The petroleum hydrocarbons are a mixture of predominantly aliphatic hydrocarbon compounds in the C6 to C14 range and a much smaller fraction (on the order of 10%) of aromatic hydrocarbon compounds. Historically, pipeline liquids were either placed in surface impoundments where the water and petroleum hydrocarbons presumably would evaporate, or the liquids were sold as a product where they would be blended with crude oil or fuel oil. Today, pipeline liquids are almost exclusively sold as a product and therefore are not classified as a waste.

In general, the only other potential waste streams which are of any significance at natural gas compressor stations are those generally associated with the operation and maintenance of internal combustion engines: used lube oil, oil filters, and wash water. The management of wastes produced at these facilities is regulated by the OCD, with the exception of hazardous wastes which are regulated by NMED. However, very little hazardous wastes, if any, are produced at natural gas compressor stations and therefore most compressor stations qualify as conditionally exempt small quantity generators under 40 C.F.R. §261.5.

<u>Description of Contaminants Used in the Past at the Roswell Station</u>

The vast majority of the contaminants (greater than 99.9%) present at the former Roswell Station surface impoundments are petroleum hydrocarbons. For example, the attached lab data shows chlorinated compounds to be present in concentrations that total less than 20 mg/kg (ppm). See Laboratory Analysis and Summary (Attachment A). In the past, these contaminants were inadvertently released into soil and groundwater as a result of waste management practices for pipeline liquids which were common at the time. However, the contaminants which have confused the issue of regulatory oversight at this site are the cleaning solutions (chlorinated solvent compounds) which were once used

during maintenance activities but are no longer used at the Roswell Station. These compounds represent a small fraction of the contaminants present in soil and groundwater. The use of these small amounts of diluted chlorinated solvents prior to the present solvent rule which was adopted on December 31, 1985 does not give rise to RCRA jurisdiction.

Prior to the adoption of the present solvent rule in 1985, the waste generated by chlorinated solvent products containing less than 100% of a specific listed solvent were not "hazardous" within the meaning of RCRA. See 50 Fed. Reg. 53315. Solutions containing 100% solvent concentrations were not used at the Roswell Facility prior to the adoption of the solvent rule, so the rule does not apply to the generation of those wastes. After the adoption of the present solvent rule, there were no releases to the surface impoundments.

In a recent sample collected from the recovered hydrocarbon liquids tank, the concentration of chlorinated compounds was not even above laboratory detection levels. See Attachment A. In order to put this into perspective, if we were to assume that all potentially identifiable chlorinated volatile organic compounds were present at their respective detection levels, then the total concentration of these compounds in the recovered hydrocarbon liquid would be less than 0.000000023% of the liquid sample. Furthermore, during prior investigation activities conducted at the site, the highest concentration measured of 1,1,1-trichloroethane, the most prevalent solvent detected at the site, was just 19.0 mg/kg (or ppm). See Attachment A. This concentration is far below the RCRA 40 C.F.R 264 proposed Subpart S action level of 7000 mg/kg. 55 Fed. Reg. 30867

Thus, remediation efforts at this site will focus almost exclusively on the reduction of hydrocarbons in the form of total petroleum hydrocarbon ("TPH") concentrations in soil, the removal of phase separated hydrocarbon from above the uppermost aquifer, and a reduction in the concentration of BTEX compounds (benzene, toluene, ethylbenzene, and xylenes) present in groundwater. These objectives are typical of other oil and gas related remediation activities which the OCD staff work with on a daily basis. As NMED has no action level or cleanup criteria for TPH, NMED has already indicated to TW that the establishment of this criteria would be coordinated with the OCD.

<u>Analysis of Applicability of RCRA to TW's Roswell Station</u>

When TW originally submitted its RCRA Part A application at the request of NMED, both TW and NMED were under a series of erroneous assumptions with regard to the use of the former surface impoundments and the applicability of RCRA regulations.

First, it was assumed that F-listed and D-listed wastes were placed in the surface impoundment. (These are wastes listed as hazardous under 40 C.F.R. §§261.24 and 261.31(a)).

There were five F-listed and D-listed waste codes listed in the RCRA Part A application. The inapplicability of RCRA regulations to each of these wastes is discussed below.

1. F001 (halogenated solvents) - Prior to the solvent rule which was finalized December 31, 1985, the F001 listing applied only to commercially pure grades of spent halogenated solvents used in degreasing (e.g. 100% trichloroethane). The 1985 solvent rule modified this definition to include spent solvent mixtures containing 10% or greater by volume of one or more of those solvents listed in F001, F002, F004, and F005.

   The last remaining surface impoundment at the Roswell Station was taken out of service well before the 1985 solvent rule. See attached aerial photo dated June 19, 1983 showing surface impoundments no longer in use and storage tanks in place (Attachment B). Once storage tanks were placed into service, the surface impoundments were no longer used.

   Furthermore, TW has conducted an investigation of past practices at the Roswell Station and similar facilities and has found no indication that a commercially pure grade spent halogenated solvent was either used at this facility during the applicable time frame or released to the impoundment, nor is it even likely that a commercially pure grade spent halogenated solvent would have been in use at the facility due to cost. A mixture of chlorinated solvents and non-chlorinated solvents (e.g., mineral spirits) is equally effective and much less costly. Laboratory reports of liquid solvent samples collected at other TW stations in 1989 show chlorinated solution concentrations of less than 100%. See the attached laboratory results (Attachment C). All available information shows no F001 wastes were ever disposed of at the Roswell Station.

   TW has identified only two past uses of halogenated solvents at the Roswell Station. The first involved placing the solvents on rags for cleaning parts where the solvents were completely used or the unused portion(s) were allowed to evaporate. The second identified use was for cleaning compressor engine crankcases during oil changes. In this case, some residual solvent may have remained in the crankcase

entrained in residual lube oil (it is generally accepted that one can not remove 100% of the lube oil within an engine during an oil change). When new lube oil would be added to the crankcase, a solvent/oil mixture should result. Therefore, during subsequent oil changes the lube oil removed from the engine would contain very low concentrations of solvents. This is the likely mechanism by which solvent compounds were released to the former surface impoundments. Because the surface impoundments were removed from service prior to adoption of the present solvent rule, the pre-1985 releases of the solvents to these surface impoundments are not subject to RCRA jurisdiction.

2. F005 (non-halogenated solvents) - Prior to the December 31, 1985 solvent rule, the F005 listing applied only to commercially pure grades of spent non-halogenated solvents (e.g., 100% toluene, methyl ethyl ketone, benzene, etc.). Again, TW's investigation of past practices found no information that these solvents, or their associated wastes, were used, stored, or disposed of at the Roswell Station. The available evidence suggests that the source of most of these types of compounds is the petroleum substances in the pipeline. Therefore, the F005 waste code should not have been included in the Part A application.

3. D004 (arsenic) - A small amount of arsenic (as trimethylarsine) is produced with natural gas from the Abo formation located just north of the Roswell Station. As a result, a small concentration of arsenic is occasionally present in pipeline liquid samples collected at the Roswell Station. Although production from this formation began in 1979, arsenic was not identified as a natural contaminant of the gas until 1987. Nor would TW or any other pipeline have any reason to suspect arsenic might be present in the gas since this is a very rare occurrence. The pipeline liquids tank was installed at the Roswell Station in 1983, therefore, the duration in which pipeline liquids potentially containing arsenic were released to the former surface impoundment was limited (approximately four years). The duration in which pipeline liquids may have been subject to evaluation by the EP Toxicity procedure for arsenic was even shorter, less than 3 years. Therefore, the evidence available to TW indicates that the EP Toxicity procedure was never used to assess the toxicity characteristic of the waste for arsenic since the presence of arsenic was unknown to TW. Even if the EP toxicity test had been conducted

for arsenic,the results would most certainly have been below threshold levels.

Moreover, the concentrations currently measured are well below those levels at which the waste stream might fail the former EP Toxicity procedure used at the time in question. See Attachment A. Based on this information, TW has no information that wastes placed in the former surface impoundment at the Roswell Station were characteristically hazardous due to arsenic. Therefore, RCRA does not apply and the D004 waste code should not have been included on the Part A application.

4. D005 (barium) - Although a small concentration of barium can be present in used engine oil collected at the Roswell Station, the concentration present is well below those levels where one might expect the waste stream to fail the former EP Toxicity procedure. 40 C.F.R. §261.24. Furthermore, TW has no information that wastes placed in the former surface impoundment at the Roswell Station would have failed the EP Toxicity procedure for barium. Therefore, RCRA does not apply and the D005 waste code should not have been included on the Part A application. Finally, the level of barium at the surface impoundments is within the range of background levels.

5. D018 (benzene) - Prior to the TC Rule effective March 29, 1990, benzene was not listed as a "Characteristic of EP Toxicity" contaminant. 55 Fed. Reg. 11798. Therefore, during the time frame that the surface impoundment was in use, there was no such thing as a D018 waste, and thus, RCRA does not apply and this waste code should not have been listed on the Part A application. Based upon all available evidence, the source of benzene was the petroleum substances in the pipeline.

The Part A Application and associated information also omitted information critical to a correct analysis of RCRA jurisdiction. For example, the "Treatment Process Design Capacity" indicated on the Part A application is 3,061,487 gallons. This figure was not based on the design capacity of the surface impoundment but rather on an inaccurate estimate of the volume of potentially affected groundwater. The estimated capacity of the surface impoundment now referred to as "Pit 1" (the only surface impoundment at the facility operated after November 19, 1980) is only 202,000 gallons. This revised estimate is based on more accurate information: dimensions obtained from historic air

photos of the facility.

Information submitted with the application indicated that only a single surface impoundment was in use from August 1960 through June 1986. Information obtained from historic air photos and facility diagrams indicates that two impoundments were used at the facility between mid-1960 and December 1983. From a closer review of the information, it appears that the first impoundment at the facility was replaced by the second impoundment sometime prior to October 1972. Therefore, only the second impoundment was operated post RCRA. Furthermore, although the second impoundment was not back-filled until June 1986, wastes were not received by this impoundment after November 1983 when the final above ground storage tanks ("ASTs") were placed in service to collect the station's waste streams. See the attached chronology of events for a more detailed description of the time frame for installation of ASTs. (Attachment D). Completion reports dated June 25, 1982, November 18, 1983 and January 25, 1984 show that the final storage tank was installed and operational by November 11, 1983. See Attachment E. Aerial photos dated June 19, 1983 show surface impoundments and in-place storage tanks. See Attachment B.

RCRA Does Not Apply Retroactively to Newly Classified Hazardous Wastes

As discussed above, the type of wastes found at the Roswell Station are almost solely petroleum hydrocarbons which do not fall under the definition of "hazardous" so as to invoke RCRA. All of the wastes listed on TW's RCRA Part A application should never have been listed: they were insufficient amounts or concentrations (e.g. arsenic, barium), the solvent products used were in diluted solutions of much less than 100% concentration, (e.g. F001 and F005 wastes), the waste category did not exist at the time the wastes were released, or they were not classified as wastes under RCRA at the time they were released (e.g., Benzene).

Any wastes that were not defined as hazardous when released do not fall under RCRA, unless characteristically hazardous and actively managed after the date the rule changed to classifying the waste as hazardous. See 54 Fed. Reg. 36592, 36597 (in narrowing the exemption for mineral processing wastes, the EPA stated that the new, narrower, definition would "not impose Subtitle C requirements on . . . wastes that were released prior to the effective date of today's rule, unless they are actively managed after the effective date"). EPA has a longstanding policy of not regulating wastes under RCRA that were released prior to the effective date of the rule governing those wastes. Id. EPA took the same position in 1992 when it added new wastes

to the hazardous list. 57 Fed. Reg. 37284[1].

Inapplicability of RCRA Closure Requirements to Natural Gas Compressor Stations

Finally, TW and the NMED have also seen several examples which indicate the RCRA closure process simply does not apply to this type of location. One example is the provisions for "waste characterization" and volume estimates of remaining waste. 40 C.F.R. §264.552(e)(4)(iii). Because the last remaining surface impoundment was backfilled nearly ten years ago, there is no "waste" remaining to characterize.

Another example is that NMED required TW to analyze impacted soil samples for constituents listed under the "petroleum refining" category found within the RCRA Facility Investigation guidance documents. This list was selected for identifying potential waste constituents of concern because, of all the categories contained within the guidance, "petroleum refining" was the only category that was even remotely related to the operations at a natural gas compressor station. However, the operations at a natural gas compressor station, in particular a mainline transmission station such as the Roswell Station, are completely different from the operations at a petroleum refinery in both the types of activities involved and the materials utilized. In petroleum refining, crude oil is refined into various fractions of petroleum, including gasoline, through the use of chemical and physical processes. By contrast, the operation of a natural gas compressor station is simple. At a compressor station, the pressure within a natural gas pipeline is increased so that natural gas may move though the pipeline. No chemical reactions are involved in the process, and far fewer waste streams are generated than at petroleum refineries. Most natural gas compressor stations are classified as either small quantity generators or conditionally exempt small quantity generators of hazardous waste.

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[1]Much of TW's waste was also exempt from RCRA under the exemption for oil and gas set forth in 42 U.S.C. §6921(b)(2)(A) (1983) (wastes associated with the exploration, development, or production of crude oil or natural gas). Before July 6, 1988, the scope of this exemption was unclear. At that point, the EPA finally issued guidelines for the exemption. 53 Fed. Reg. 25446. As TW used its last surface impoundment in 1983, the waste should fall under the exemption for oil and gas wastes. Any narrowing of that exemption as set forth on July 6, 1988, would not be retroactively applied to wastes deposited before that date unless they were actively managed. 54 Fed. Reg. at 36597.

OCD Oversight is Fully Protective of NMED and New Mexico Standards

Remediation activities at the Roswell Station can proceed much more rapidly and cost effectively for the state and TW with oversight authority by the OCD. This is true primarily because the OCD is not bound by the lengthy procedural requirements typical of RCRA closures. Attached to this letter are flow charts which depict two process scenarios for assessment and cleanup at the Roswell Station. See Attachment F. The first chart was prepared by NMED Hazardous Radioactive Materials Bureau ("HRMB") and presented to TW during a March, 1995 meeting with TW. The second chart illustrates the process TW has undergone for assessment and clean-up under the OCD oversight. The charts demonstrate the efficiency and relative straight forwardness of a clean-up plan pursuant to the OCD system as compared to the NMED system.

As the NMED has no action level or clean up criteria for total petroleum hydrocarbons (nearly 100% of the contaminants of concern) and is establishing this criteria in coordination with the OCD, there will be no difference between clean up criteria for soil established by NMED versus that under the OCD oversight. With respect to groundwater contamination, the OCD enforces the New Mexico Water Quality Control Commission ("NMWQCC") standards. The NMED HRMB uses the lower of the NMWQCC standards, the federal Safe Drinking Water Act MCLS, or the RCRA action level. The NMWQCC standards are as a rule the lowest, so cleanup under the OCD should satisfy NMED. The SDWA MCL standard for benzene is 5ug/l which is lower than that used by the OCD. The NMWQCC standard is 10ug/l but, considering the limited potential use of affected groundwater at the Roswell Station, from a practical standpoint, clean up to either standard is equally protective of human health and the environment.

Clean Up Under OCD Authority is Consistent With Proposed EPA Regulations

There is new proposed authority for allowing remediation activities to proceed under the authority and oversight of the OCD. The EPA drafted new proposed regulations entitled the Hazardous Waste Identification Rule-Media ("the Proposed Rule") to be published in the Federal Register later this year. The Proposed Rule addresses the need to focus on results instead of inflexible compliance with rules. The Proposed Rule recognizes that one-time cleanup of contaminated media is best accomplished with a plan tailored to cleanup. Under the Proposed Rule, a Remediation Management Plan ("RMP") will take the place of the current post-closure permitting requirements. See Proposed Rule at 63 et. seq. It will achieve closure in a much shorter time

frame and avoid difficulties that arise in attempting to work within the framework of RCRA Subtitle C closure.

The closure requirements contained in 40 C.F.R. Part 265 Subpart G were developed with the clear intention that they would apply to closure of waste management units of operational TSDFs where hazardous wastes were intentionally treated, stored, or disposed (not a site such as Roswell which was never operated as a TSDF). This problem is well recognized by EPA as evidenced by their recent efforts to create a distinction between management of contaminated media during remediation activities and "as generated" hazardous wastes. Proposed Rule at 7. In the proposed rule, the EPA recognizes that current regulations are not tailored toward purely remedial activity which is what is involved at the Roswell Station. Proposed Rule at 7. The EPA recognizes that there are fundamental differences in the objectives and incentives of prevention oriented programs like RCRA and remediation oriented programs like the proposed rule. Proposed Rule at 6. Remediation activity is highly site-specific and not as amenable to stringent, inflexible standards. Id. at 8.

TW's Proposed Regulatory Path

Although it is obvious that a compressor station was never intended nor contemplated to be a TSDF, much time and energy has been spent in an attempt to apply TSDF standards to the Roswell Station. It is unfortunate that both TW and NMED have devoted almost all of their efforts to the closure of the location rather than scrutinizing the circumstances under which these substances of concern were released and the regulatory framework that was in effect at the time of the releases. The Proposed Rule provides a solution, and should be used by NMED as a guide to resolving the regulatory issues presented in this situation.

Remediation activities at the Roswell Station must proceed under the authority of the OCD for three reasons. First and most significantly, the waste should never have been classified as hazardous under RCRA; therefore, RCRA simply does not apply. Second, the OCD is experienced in overseeing the cleanup of sites with similar petroleum hydrocarbon contamination and the OCD and TW have a proven history of cooperation in accomplishing efficient, timely cleanup. Third, allowing remediation activities to proceed under the authority of the OCD is the best regulatory policy because RCRA is prevention oriented not remediation oriented.

Within this framework, TW proposes to withdraw its Part A application, and negotiate an appropriate procedure with NMED and the OCD to keep NMED informed about the OCD remediation.

If you have any questions or need additional information, please contact me at (505) 983-6101.

Very truly yours,

TAICHERT, WIGGINS, VIRTUE & NAJJAR

By _____
Richard L. C. Virtue
Santa Fe Office

RLCV:mm
laura\hughes3.ltr

cc by hand-delivery:

Mark E. Weidler	Secretary of the New Mexico Environment Department
Ed Kelley	Director, Water & Waste Management Division of the New Mexico Environment Department
Benito Garcia	Chief, Hazardous & Radioactive Material Bureau of the New Mexico Environment Department
Susan McMichael, Esq.	Official General Counsel, New Mexico Environment Department

cc by mail:

Lou Soldano, Esq.	ENRON Operations Corp. Legal
Frank Smith, Esq.	ENRON Corp. Legal
Dave Nutt, Esq.	ENRON Corp. Legal
Bill Kendrick	ENRON Operations Corp. Environmental Affairs
Rodger Anderson	Oil Conservation Division of the New Mexico Energy, Minerals and Natural Resources Division

EXHIBIT A

ROSWELL STATION

Summary of analytical results for hydrocarbon liquid sample collected from the remediation system recovery tank and analytical results for the most heavily affected soil sample collected during recent soil assessment activities.

Liquid Sample

The only organic compounds detected are the four BTEX compounds. No halogenated organics were detected (detection limits are somewhat elevated due to maxtric interference but this is to be expected when analyzing a hydrocarbon sample)

Soil Sample

In regard to the soil sample collected from the former surface impoundment area, note that the following non-naturally occurring organic hydrocarbons were detected:

Compound	Result(mg/kg)	Detection Limit	Comments
phenol	200.000	33.000	most likely a lab artifact
carbon disulfide	0.060	0.020	
1,1-dichloroethane	1.200	0.600	
1,1-dichloroethene	0.040	0.020	
2-hexanone	0.460	0.020	
methylene chloride	0.160	0.020	most likely a lab contaminant
tetrachloroethane	0.040	0.020	
1,1,1-trichloroethane	19.000	0.600	
vinyl acetate	7.000	6.000	most likely a lab artifact
TOTAL	**227.960**	**(20.800 w/o contaminants & artifacts)**	

Attachment A

The TPH result was 26,000 mg/kg, therefore, 227.96/26,000 = 0.0088 = 0.88% and therefore 99.12% or greater is petroleum hydrocarbons.

Not including the lab artifacts and contaminants, 20.8/26,000 = 0.00080 = 0.08% and therefore 99.92% is petroleum hydrocarbons.

The other organic compounds detected are naturally occurring petroleum hydrocarbons, those are: phenanthrene, benzene, ethylbenzene, toluene, and xylenes.

enron\exhibit.a

NATIONAL ENVIRONMENTAL TESTING, INC.

Dallas Division
1548 Valwood Parkway
Suite 118
Carrollton, TX 75006
Tel: (214) 406-8100
Fax: (214) 484-2969

ANALYTICAL AND QUALITY CONTROL REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

06/19/1995

NET Job Number: 95.03823

Enclosed is the Analytical and Quality Control report for the following samples submitted to the Dallas Division of NET, Inc. for analysis. Reproduction of this analytical report is permitted only in its entirety.

Sample Number	Sample Description	Date Taken	Date Received
264681	RECOVERY TANK REMEDIATION ROSWE	06/12/1995	06/13/1995

National Environmental Testing, Inc. certifies that the analytical results contained herein apply only to the specific samples analyzed.

Holding Times: All holding times were within method criteria.

Method Blanks: All method blanks were within quality control criteria.

Instrument calibration: All calibrations were within method quality control criteria.

Analysis Comments: No Unusual Comments

Gregory K. Horton
Project Coordinator

ANALYTICAL REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

06/19/1995
Job No.: 95.03823

Project Name: ROSWELL STATION

Date Received: 06/13/1995

264681 RECOVERY TANK REMEDIATION ROSWELL
Taken: 06/12/1995 15:00

TCLP-Arsenic, ICP	0.35		mg/L
TCLP-Barium, ICP	1.1		mg/L
TCLP-Cadmium, ICP	<0.01		mg/L
TCLP-Chromium, ICP	<0.01		mg/L
TCLP-Lead, ICP	<0.03		mg/L
TCLP-Mercury, CVAA	<0.0002		mg/L
TCLP-Selenium, ICP	<0.04		mg/L
TCLP-Silver, ICP	<0.01		mg/L
Flash Point	104		F
ACID EXT.-8270 AQUEOUS			
Benzoic acid	<2,000		ug/kg
Benzyl alcohol	<500		ug/kg
4-Chloro-3-methylphenol	<500		ug/kg
2-Chlorophenol	<500		ug/kg
2,4-Dichlorophenol	<500		ug/kg
2,4-Dimethylphenol	<500		ug/kg
2,4-Dinitrophenol	<2,000		ug/kg
2-Methyl-4,6-dinitrophenol	<2,000		ug/kg
2-Methylphenol (o-Cresol)	<500		ug/kg
4-Methylphenol (p-Cresol)	<500		ug/kg
2-Nitrophenol	<500		ug/kg
4-Nitrophenol	<2,000		ug/kg
Pentachlorophenol	<2,000		ug/kg
Phenol	<500		ug/kg
2,4,5-Trichlorophenol	<500		ug/kg
2,4,6-Trichlorophenol	<500		ug/kg
SURR: 2-Fluorophenol	N/A	D	%
SURR: Phenol-d5	N/A	D	%
SURR: 2,4,6-Tribromophenol	N/A	D	%
BASE/NEUTRALS - 8270 AQUEOUS			
Acenaphthene	<500		ug/kg
Acenaphthylene	<500		ug/kg
Aniline	<500		ug/kg
Anthracene	<500		ug/kg
Benzidine	<1,000		ug/kg
Benzo(a)anthracene	<500		ug/kg
Benzo(b)fluoranthene	<500		ug/kg
Benzo(k)fluoranthene	<500		ug/kg
Benzo(g,h,i)perylene	<500		ug/kg
Benzo(a)pyrene	<500		ug/kg

D - Surrogate diluted out.

ANALYTICAL REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

06/19/1995
Job No.: 95.03823

Project Name: ROSWELL STATION

Date Received: 06/13/1995

264681 RECOVERY TANK REMEDIATION ROSWELL
Taken: 06/12/1995 15:00

Benzyl butyl phthalate	<500	ug/kg
Bis(2-chloroethoxy)methane	<500	ug/kg
Bis(2-chloroethyl)ether	<500	ug/kg
Bis(2-chloroisopropyl)ether	<500	ug/kg
Bis(2-ethylhexyl)phthalate	<500	ug/kg
4-Bromophenyl phenyl ether	<500	ug/kg
4-Chloroaniline	<500	ug/kg
2-Chloronaphthalene	<500	ug/kg
4-Chlorophenyl phenyl ether	<500	ug/kg
Chrysene	<500	ug/kg
Dibenzo(a,h)anthracene	<500	ug/kg
Dibenzofuran	<500	ug/kg
Di-n-butyl phthalate	<500	ug/kg
1,2-Dichlorobenzene	<500	ug/kg
1,3-Dichlorobenzene	<500	ug/kg
1,4-Dichlorobenzene	<500	ug/kg
3,3'-Dichlorobenzidine	<1,000	ug/kg
Diethyl phthalate	<500	ug/kg
Dimethyl phthalate	<500	ug/kg
2,4-Dinitrotoluene	<500	ug/kg
2,6-Dinitrotoluene	<500	ug/kg
Di-n-octyl phthalate	<500	ug/kg
Fluoranthene	<500	ug/kg
Fluorene	<500	ug/kg
Hexachlorobenzene	<500	ug/kg
Hexachlorobutadiene	<500	ug/kg
Hexachlorocyclopentadiene	<500	ug/kg
Hexachloroethane	<500	ug/kg
Indeno(1,2,3-cd)pyrene	<500	ug/kg
Isophorone	<500	ug/kg
2-Methylnaphthalene	<500	ug/kg
Naphthalene	<500	ug/kg
2-Nitroaniline	<2,000	ug/kg
3-Nitroaniline	<2,000	ug/kg
4-Nitroaniline	<2,000	ug/kg
Nitrobenzene	<500	ug/kg
N-Nitrosodimethylamine	<500	ug/kg
N-Nitrosodi-n-propylamine	<500	ug/kg
N-Nitrosodiphenylamine	<500	ug/kg
Phenanthrene	<500	ug/kg

ANALYTICAL REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

06/19/1995
Job No.: 95.03823

Project Name: ROSWELL STATION

Date Received: 06/13/1995

264681 RECOVERY TANK REMEDIATION ROSWELL
Taken: 06/12/1995 15:00

Pyrene	<500		ug/kg
1,2,4-Trichlorobenzene	<500		ug/kg
SURR: 2-Fluorobiphenyl	N/A	D	%
SURR: Nitrobenzene-d5	N/A	D	%
SURR: Terphenyl-d14	N/A	D	%
VOA 8240 NONAQ.			
Acetone	<100		ug/kg
Benzene	9800		ug/kg
Bromodichloromethane	<50		ug/kg
Bromoform	<50		ug/kg
Bromomethane	<100		ug/kg
2-Butanone (MEK)	<200		ug/kg
Carbon disulfide	<50		ug/kg
Carbon tetrachloride	<50		ug/kg
Chlorobenzene	<50		ug/kg
Chloroethane	<100		ug/kg
2-Chloroethylvinyl ether	<200		ug/kg
Chloroform	<50		ug/kg
Chloromethane	<100		ug/kg
Dibromochloromethane	<50		ug/kg
1,1-Dichloroethane	<50		ug/kg
1,2-Dichloroethane	<50		ug/kg
1,1-Dichloroethene	<50		ug/kg
trans-1,2-Dichloroethene	<50		ug/kg
1,2-Dichloropropane	<50		ug/kg
cis-1,3-Dichloropropene	<50		ug/kg
trans-1,3-Dichloropropene	<50		ug/kg
Ethyl benzene	170000		ug/kg
2-Hexanone	<200		ug/kg
Methylene chloride	<50		ug/kg
4-Methyl-2-pentanone (MIBK)	<50		ug/kg
Styrene	<50		ug/kg
1,1,2,2-Tetrachloroethane	<50		ug/kg
Tetrachloroethene	<50		ug/kg
Toluene	30000		ug/kg
1,1,1-Trichloroethane	<50		ug/kg
1,1,2-Trichloroethane	<50		ug/kg
Trichloroethene	<50		ug/kg
Vinyl acetate	<50		ug/kg
Vinyl chloride	<100		ug/kg

D - Surrogate diluted out.

ANALYTICAL REPORT

Larry Campbell
TRANSWESTERN PIPELINE
6381 N. Main St.
Roswell, NM 88202

06/19/1995
Job No.: 95.03823

Project Name: ROSWELL STATION

Date Received: 06/13/1995

264681 RECOVERY TANK REMEDIATION ROSWELL
Taken: 06/12/1995 15:00

Xylenes, Total	164000	ug/kg
SURR: 1,2-Dichloroethane-d4	99	% Rec
SURR: Toluene-d8	101	% Rec
SURR: 4-Bromofluorobenzene	100	% Rec

CORE LABORATORIES

LABORATORY TESTS RESULTS

Report Date: 09/20/95

JOB NUMBER: 954165 CUSTOMER: Daniel B. Stevens & Associates ATTN: Jeff Forbes

Customer Sample ID.: PIT 1, SE BORING
Sample Date.....: 08/18/95
Sample Time.....: 10:00
Sample Matrix.....: Soil

Laboratory Sample ID.: 954165-10
Date Received.....: 08/22/95
Time Received.....: 10:15

TEST DESCRIPTION	TEST MATRIX	FINAL RESULT	DETECTION LIMIT	UNITS OF MEASURE	TEST METHOD	DATE ANALYZED	TECHNICIAN
Sulfide	Solid	940	50	mg/Kg	SW-846 9030	09/05/95 0800	* cc
Acid Digestion: Solids		completed	0	Not Applicable	SW-846 3050	08/30/95 1000	lmt
Mercury (Hg)	Solid	1.36	0.10	mg/Kg	SW-846 7471	09/01/95 1132	lmt
Aluminum (Al)	Solid	1690	5	mg/Kg	SW-846 6010	09/06/95 2127	gef
Antimony (Sb)	Solid	<10	10	mg/Kg	SW-846 6010	09/06/95 2127	gef
Arsenic (As)	Solid	17	5	mg/Kg	SW-846 6010	09/06/95 2127	gef
Barium (Ba)	Solid	171	1	mg/Kg	SW-846 6010	09/06/95 2127	gef
Beryllium (Be)	Solid	<0.5	0.5	mg/Kg	SW-846 6010	09/06/95 2127	gef
Cadmium (Cd)	Solid	<0.5	0.5	mg/Kg	SW-846 6010	09/06/95 2127	gef
Chromium (Cr)	Solid	9	1	mg/Kg	SW-846 6010	09/06/95 2127	gef
Cobalt (Co)	Solid	<3	3	mg/Kg	SW-846 6010	09/06/95 2127	gef
Copper (Cu)	Solid	337	1	mg/Kg	SW-846 6010	09/06/95 2127	gef
Lead (Pb)	Solid	11	5	mg/Kg	SW-846 6010	09/06/95 2127	gef
Nickel (Ni)	Solid	5	4	mg/Kg	SW-846 6010	09/06/95 2127	gef
Selenium (Se)	Solid	<10	10	mg/Kg	SW-846 6010	09/06/95 2127	gef
Silver (Ag)	Solid	<1	1	mg/Kg	SW-846 6010	09/06/95 2127	gef

CORE LABORATORIES

LABORATORY TESTS RESULTS
Report Date: 09/20/95

JOB NUMBER: 954165 CUSTOMER: Daniel B. Stevens & Associates ATTN: Jeff Forbes

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TEST DESCRIPTION	TEST MATRIX	FINAL RESULT	DETECTION LIMIT	UNITS OF MEASURE	TEST METHOD	DATE ANALYZED	TECHNICIAN
Thallium (Tl)	Solid	<10	10	mg/Kg	SW-846 6010	09/06/95 2127	gef
Tin (Sn)	Solid	6	5	mg/Kg	SW-846 6010	09/06/95 2127	gef
Vanadium (V)	Solid	10	5	mg/Kg	SW-846 6010	09/06/95 2127	gef
Zinc (Zn)	Solid	282	1	mg/Kg	SW-846 6010	09/06/95 2127	gef
Ultrasonic Extraction		completed		Not Applicable	SW-846 3550	08/30/95	mla
Ultrasonic Extraction		completed	0	Not Applicable	SW-846 3550	08/28/95 0000	mla
Total Recoverable Petroleum Hydrocarbons	Solid	26000	1000	mg/Kg	EPA 418.1	09/11/95 0915	jbd
Cyanide (Colorimetric, Manual)					SW-846 9010		kds
Cyanide (CN)	Solid	1.4	0.4	mg/Kg		08/28/95 1000	
PCB Analysis					SW-846 8080		lb
Aroclor 1016	Solid	ND	1700	ug/Kg		09/13/95 0137	
Aroclor 1221	Solid	ND	1700	ug/Kg		09/13/95 0137	
Aroclor 1232	Solid	ND	1700	ug/Kg		09/13/95 0137	
Aroclor 1242	Solid	ND	1700	ug/Kg		09/13/95 0137	
Aroclor 1248	Solid	ND	1700	ug/Kg		09/13/95 0137	
Aroclor 1254	Solid	ND	1700	ug/Kg		09/13/95 0137	
Aroclor 1260	Solid	ND	1700	ug/Kg		09/13/95 0137	
Aroclor 1262	Solid	ND	1700	ug/Kg		09/13/95 0137	
Aroclor 1268	Solid	ND	1700	ug/Kg		09/13/95 0137	
Semivolatile Organics (Client List)					SW-846 8270		mla
Acenaphthene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Acenaphthylene	Solid	ND	3300	ug/Kg		09/11/95 1946	

CORE LABORATORIES

LABORATORY TESTS RESULTS
Report Date: 09/20/95

JOB NUMBER: 954165 CUSTOMER: Daniel B. Stevens & Associates ATTN: Jeff Forbes

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Sample Date.....: 08/18/95
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Laboratory Sample ID.: 954165-10
Date Received.....: 08/22/95
Time Received.....: 10:15

TEST DESCRIPTION	TEST MATRIX	FINAL RESULT	DETECTION LIMIT	UNITS OF MEASURE	TEST METHOD	DATE ANALYZED	TECHNICIAN
Acetophenone	Solid	ND	3300	ug/Kg		09/11/95 1946	
4-Aminobiphenyl	Solid	ND	3300	ug/Kg		09/11/95 1946	
Aniline	Solid	ND	3300	ug/Kg		09/11/95 1946	
Anthracene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Benzidine	Solid	ND	16500	ug/Kg		09/11/95 1946	
Benzo(a)anthracene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Benzo(b)fluoranthene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Benzo(j)fluoranthene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Benzo(k)fluoranthene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Benzo(ghi)perylene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Benzo(a)pyrene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Benzyl alcohol	Solid	ND	6600	ug/Kg		09/11/95 1946	
Butyl benzyl phthalate	Solid	ND	3300	ug/Kg		09/11/95 1946	
Bis(2-chloroethoxy)methane	Solid	ND	3300	ug/Kg		09/11/95 1946	
Bis(2-chloroethyl)ether	Solid	ND	3300	ug/Kg		09/11/95 1946	
Bis(2-chloroisopropyl)ether	Solid	ND	3300	ug/Kg		09/11/95 1946	
Bis(2-ethylhexyl)phthalate	Solid	ND	3300	ug/Kg		09/11/95 1946	
4-Bromophenyl phenyl ether	Solid	ND	3300	ug/Kg		09/11/95 1946	
4-Chloroaniline	Solid	ND	3300	ug/Kg		09/11/95 1946	
Chlorobenzilate	Solid	ND	3300	ug/Kg		09/11/95 1946	
1-Chloronaphthalene	Solid	ND	3300	ug/Kg		09/11/95 1946	
2-Chloronaphthalene	Solid	ND	3300	ug/Kg		09/11/95 1946	
4-Chlorophenyl phenyl ether	Solid	ND	3300	ug/Kg		09/11/95 1946	
Chrysene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Diallate	Solid	ND	3300	ug/Kg		09/11/95 1946	
Dibenzo(a,j)acridine	Solid	ND	3300	ug/Kg		09/15/95 0246	
Dibenzo(a,h)anthracene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Dibenzofuran	Solid	ND	3300	ug/Kg		09/11/95 1946	
1,2-Dichlorobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
1,3-Dichlorobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
1,4-Dichlorobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	

CORELAB

CORE LABORATORIES

LABORATORY TESTS RESULTS

Report Date: 09/20/95

JOB NUMBER: 954165 CUSTOMER: Daniel B. Stevens & Associates ATTN: Jeff Forbes

Customer Sample ID.: PIT 1, SE BORING
Sample Date.....: 08/18/95
Sample Time.....: 10:00
Sample Matrix.....: Soil

Laboratory Sample ID.: 954165-10
Date Received.....: 08/22/95
Time Received.....: 10:15

TEST DESCRIPTION	TEST MATRIX	FINAL RESULT	DETECTION LIMIT	UNITS OF MEASURE	TEST METHOD	DATE ANALYZED	TECHNICIAN
3,3-Dichlorobenzidine	Solid	ND	3300	ug/Kg		09/11/95 1946	
Diethyl phthalate	Solid	ND	3300	ug/Kg		09/11/95 1946	
p-Dimethylaminoazobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Dimethoate	Solid	ND	6600	ug/Kg		09/11/95 1946	
7,12-Dimethylbenz(a)anthracene	Solid	ND	3300	ug/Kg		09/11/95 1946	
alpha, alpha-Dimethylphenethylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
Dimethyl phthalate	Solid	ND	3300	ug/Kg		09/11/95 1946	
Di-n-butyl phthalate	Solid	ND	3300	ug/Kg		09/11/95 1946	
Di-n-octyl phthalate	Solid	ND	3300	ug/Kg		09/11/95 1946	
2,4-Dinitrotoluene	Solid	ND	3300	ug/Kg		09/11/95 1946	
2,6-Dinitrotoluene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Dinoseb (DNBP)	Solid	ND	3300	ug/Kg		09/11/95 1946	
Diphenylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
1,2-Diphenylhydrazine	Solid	ND	3300	ug/Kg		09/11/95 1946	
Disulfoton	Solid	ND	3300	ug/Kg		09/11/95 1946	
Ethyl methane sulfonate	Solid	ND	3300	ug/Kg		09/11/95 1946	
Fluoranthene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Fluorene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Hexachlorobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Hexachlorobutadiene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Hexachlorocyclopentadiene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Hexachloroethane	Solid	ND	3300	ug/Kg		09/11/95 1946	
Hexachlorophene	Solid	ND	3300	ug/Kg		09/15/95 0246	
Hexachloropropene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Indeno(1,2,3-cd)pyrene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Isodrin	Solid	ND	3300	ug/Kg		09/11/95 1946	
Isophorone	Solid	ND	3300	ug/Kg		09/11/95 1946	
Isosafrole	Solid	ND	3300	ug/Kg		09/11/95 1946	
Kepone	Solid	ND	16500	ug/Kg		09/15/95 0246	
Methapyrilene	Solid	ND	3300	ug/Kg		09/11/95 1946	
3-Methylcholanthrene	Solid	ND	3300	ug/Kg		09/11/95 1946	

CORE LABORATORIES

LABORATORY TESTS RESULTS
Report Date: 09/20/95

JOB NUMBER: 954165 CUSTOMER: Daniel B. Stevens & Associates ATTN: Jeff Forbes

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TEST DESCRIPTION	TEST MATRIX	FINAL RESULT	DETECTION LIMIT	UNITS OF MEASURE	TEST METHOD	DATE ANALYZED	TECHNICIAN
Methyl methane sulfonate	Solid	ND	3300	ug/Kg		09/11/95 1946	
2-Methylnaphthalene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Naphthalene	Solid	ND	3300	ug/Kg		09/11/95 1946	
1,4-Naphthoquinone	Solid	ND	3300	ug/Kg		09/11/95 1946	
1-Naphthylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
2-Naphthylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
o-Nitroaniline	Solid	ND	16500	ug/Kg		09/11/95 1946	
m-Nitroaniline	Solid	ND	16500	ug/Kg		09/11/95 1946	
p-Nitroaniline	Solid	ND	16500	ug/Kg		09/11/95 1946	
Nitrobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
4-Nitroquinoline-1-oxide	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosodi-n-butylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosodiethylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosodimethylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosomethylethylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosomorpholine	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosodi-n-propylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosodiphenylamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosopiperidine	Solid	ND	3300	ug/Kg		09/11/95 1946	
n-Nitrosopyrolidine	Solid	ND	3300	ug/Kg		09/11/95 1946	
5-Nitro-o-toluidine	Solid	ND	3300	ug/Kg		09/11/95 1946	
Ethyl parathion	Solid	ND	3300	ug/Kg		09/11/95 1946	
Pentachlorobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Pentachloronitrobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Phenacetin	Solid	ND	3300	ug/Kg		09/11/95 1946	
Phenanthrene	Solid	5000	3300	ug/Kg		09/11/95 1946	
p-Phenylenediamine	Solid	ND	3300	ug/Kg		09/11/95 1946	
Phorate	Solid	ND	3300	ug/Kg		09/11/95 1946	
2-Picoline	Solid	ND	3300	ug/Kg		09/11/95 1946	
Pronamide	Solid	ND	3300	ug/Kg		09/11/95 1946	
Pyrene	Solid	ND	3300	ug/Kg		09/11/95 1946	

CORE LABORATORIES

LABORATORY TESTS RESULTS
Report Date: 09/20/95

JOB NUMBER: 954165 CUSTOMER: Daniel B. Stevens & Associates ATTN: Jeff Forbes

Customer Sample ID.: PIT 1, SE BORING
Sample Date.....: 08/18/95
Sample Time.....: 10:00
Sample Matrix.....: Soil

Laboratory Sample ID.: 954165-10
Date Received.....: 08/22/95
Time Received.....: 10:15

TEST DESCRIPTION	TEST MATRIX	FINAL RESULT	DETECTION LIMIT	UNITS OF MEASURE	TEST METHOD	DATE ANALYZED	TECHNICIAN
Pyridine	Solid	ND	3300	ug/Kg		09/11/95 1946	
Safrole	Solid	ND	3300	ug/Kg		09/11/95 1946	
1,2,4,5-Tetrachlorobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
o-Toluidine	Solid	ND	3300	ug/Kg		09/11/95 1946	
1,2,4-Trichlorobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
O,O,O-Triethyl phosphorothioate	Solid	ND	3300	ug/Kg		09/11/95 1946	
1,3,5-Trinitrobenzene	Solid	ND	3300	ug/Kg		09/11/95 1946	
Benzoic acid	Solid	ND	16500	ug/Kg		09/11/95 1946	
4-Chloro-3-methylphenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
2-Chlorophenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
2,4-Dichlorophenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
2,6-Dichlorophenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
2,4-Dimethylphenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
2,4-Dinitrophenol	Solid	ND	16500	ug/Kg		09/11/95 1946	
2-Methyl-4,6-dinitrophenol	Solid	ND	16500	ug/Kg		09/11/95 1946	
2-Methylphenol (o-cresol)	Solid	ND	3300	ug/Kg		09/11/95 1946	
3 & 4 Methylphenol (m&p cresol)	Solid	ND	3300	ug/Kg		09/11/95 1946	
2-Nitrophenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
4-Nitrophenol	Solid	ND	16500	ug/Kg		09/11/95 1946	
Pentachlorophenol	Solid	ND	16500	ug/Kg		09/11/95 1946	
Phenol	Solid	200000	33000	ug/Kg		09/13/95 0041	
2,3,4,6-Tetrachlorophenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
2,4,5-Trichlorophenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
2,4,6-Trichlorophenol	Solid	ND	3300	ug/Kg		09/11/95 1946	
Volatile Organics (Client Requested)					SW-846 8240		bfr
Acetonitrile	Solid	ND	500	ug/Kg		08/28/95 1341	
Acrolein	Solid	ND	200	ug/Kg		08/28/95 1341	
Acrylonitrile	Solid	ND	100	ug/Kg		08/28/95 1341	
Acetone	Solid	ND	500	ug/Kg		08/28/95 1341	
Allyl chloride	Solid	ND	100	ug/Kg		08/28/95 1341	

CORE LABORATORIES

LABORATORY TESTS RESULTS
Report Date: 09/20/95

JOB NUMBER: 954165 CUSTOMER: Daniel B. Stevens & Associates ATTN: Jeff Forbes

Customer Sample ID.: PIT 1, SE BORING
Sample Date.....: 08/18/95
Sample Time.....: 10:00
Sample Matrix.....: Soil

Laboratory Sample ID.: 954165-10
Date Received.....: 08/22/95
Time Received.....: 10:15

TEST DESCRIPTION	TEST MATRIX	FINAL RESULT	DETECTION LIMIT	UNITS OF MEASURE	TEST METHOD	DATE ANALYZED	TECHNICIAN
Benzene	Solid	850	20	ug/Kg		08/28/95 1341	
Benzyl chloride	Solid	ND	20	ug/Kg		08/28/95 1341	
Bromobenzene	Solid	ND	20	ug/Kg		08/28/95 1341	
Bromochloromethane	Solid	ND	20	ug/Kg		08/28/95 1341	
Bromodichloromethane	Solid	ND	20	ug/Kg		08/28/95 1341	
Bromoform	Solid	ND	20	ug/Kg		08/28/95 1341	
Bromomethane	Solid	ND	50	ug/Kg		08/28/95 1341	
Methyl ethyl ketone (2-Butanone)	Solid	ND	500	ug/Kg		08/28/95 1341	
Carbon disulfide	Solid	60	20	ug/Kg		08/28/95 1341	
Carbon tetrachloride	Solid	ND	20	ug/Kg		08/28/95 1341	
Chlorobenzene	Solid	ND	20	ug/Kg		08/28/95 1341	
Chloroethane	Solid	ND	50	ug/Kg		08/28/95 1341	
2-Chloroethylvinyl ether	Solid	ND	20	ug/Kg		08/28/95 1341	
Chloroform	Solid	ND	20	ug/Kg		08/28/95 1341	
Chloromethane	Solid	ND	20	ug/Kg		08/28/95 1341	
2-Chloro-1,3-butadiene (chloroprene)	Solid	ND	20	ug/Kg		08/28/95 1341	
Dibromochloromethane	Solid	ND	20	ug/Kg		08/28/95 1341	
1,2-Dibromoethane (EDB)	Solid	ND	20	ug/Kg		08/28/95 1341	
1,2-Dibromo-3-chloropropane	Solid	ND	20	ug/Kg		08/28/95 1341	
Dibromomethane	Solid	ND	20	ug/Kg		08/28/95 1341	
trans-1,4-Dichloro-2-butene	Solid	ND	200	ug/Kg		08/28/95 1341	
Dichlorodifluoromethane	Solid	ND	50	ug/Kg		08/28/95 1341	
1,1-Dichloroethane	Solid	1200	600	ug/Kg		08/31/95 1305	
1,2-Dichloroethane	Solid	ND	20	ug/Kg		08/28/95 1341	
1,1-Dichloroethene	Solid	40	20	ug/Kg		08/28/95 1341	
cis-1,2-Dichloroethene	Solid	ND	20	ug/Kg		08/28/95 1341	
trans-1,2-Dichloroethene	Solid	ND	20	ug/Kg		08/28/95 1341	
1,2-Dichloropropane	Solid	ND	20	ug/Kg		08/28/95 1341	
cis-1,3-Dichloropropene	Solid	ND	20	ug/Kg		08/28/95 1341	
trans-1,3-Dichloropropene	Solid	ND	20	ug/Kg		08/28/95 1341	
Ethylbenzene	Solid	370	20	ug/Kg		08/28/95 1341	

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CORE LABORATORIES

LABORATORY TESTS RESULTS

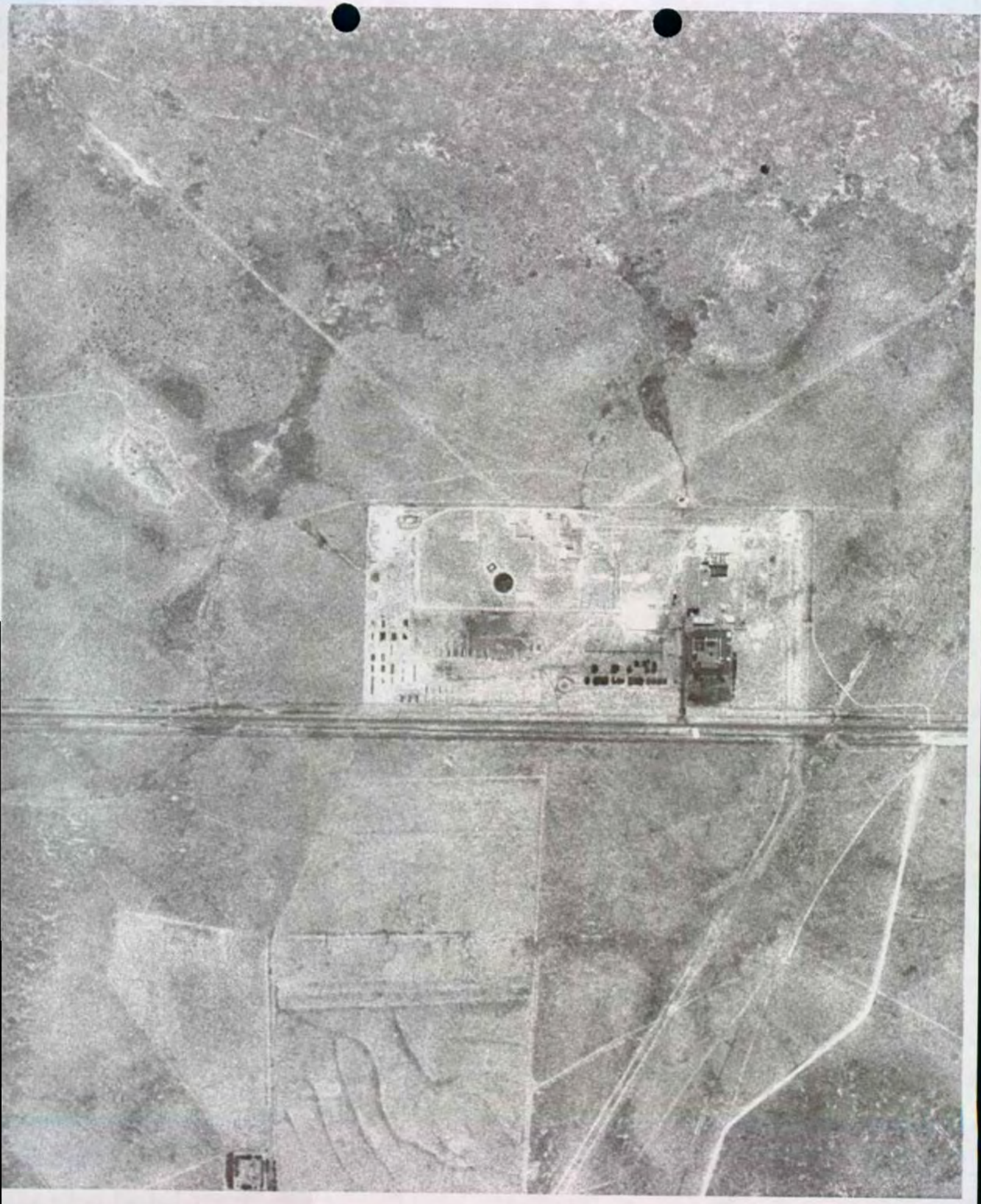
Report Date: 09/20/95

JOB NUMBER: 954165 CUSTOMER: Daniel B. Stevens & Associates ATTN: Jeff Forbes

Customer Sample ID.: PIT 1, SE BORING
Sample Date.....: 08/18/95
Sample Time.....: 10:00
Sample Matrix.....: Soil

Laboratory Sample ID.: 954165-10
Date Received.....: 08/22/95
Time Received.....: 10:15

TEST DESCRIPTION	TEST MATRIX	FINAL RESULT	DETECTION LIMIT	UNITS OF MEASURE	TEST METHOD	DATE ANALYZED	TECHNICIAN
Ethyl methacrylate	Solid	ND	20	ug/Kg		08/28/95 1341	
2-Hexanone	Solid	460	20	ug/Kg		08/28/95 1341	
Iodomethane	Solid	ND	20	ug/Kg		08/28/95 1341	
Isobutyl alcohol	Solid	ND	200	ug/Kg		08/28/95 1341	
Methylacrylonitrile	Solid	ND	200	ug/Kg		08/28/95 1341	
Methylene chloride	Solid	160	20	ug/Kg		08/28/95 1341	
Methyl methacrylate	Solid	ND	20	ug/Kg		08/28/95 1341	
4-Methyl-2-pentanone (MIBK)	Solid	ND	200	ug/Kg		08/28/95 1341	
Pentachloroethane	Solid	ND	20	ug/Kg		08/28/95 1341	
Propionitrile	Solid	ND	500	ug/Kg		08/28/95 1341	
Styrene	Solid	ND	20	ug/Kg		08/28/95 1341	
1,1,1,2-Tetrachloroethane	Solid	ND	20	ug/Kg		08/28/95 1341	
1,1,2,2-Tetrachloroethane	Solid	ND	20	ug/Kg		08/28/95 1341	
Tetrachloroethene	Solid	40	20	ug/Kg		08/28/95 1341	
Toluene	Solid	9100	600	ug/Kg		08/31/95 1305	
1,1,1-Trichloroethane	Solid	16000	600	ug/Kg		08/31/95 1305	
1,1,2-Trichloroethane	Solid	ND	20	ug/Kg		08/28/95 1341	
Trichloroethene	Solid	ND	20	ug/Kg		08/28/95 1341	
Trichlorofluoromethane	Solid	ND	50	ug/Kg		08/28/95 1341	
1,2,3-Trichloropropane	Solid	ND	20	ug/Kg		08/28/95 1341	
Vinyl acetate	Solid	7000	6000	ug/Kg		08/31/95 1305	
Vinyl chloride	Solid	ND	50	ug/Kg		08/28/95 1341	
Xylenes (total)	Solid	2400	20	ug/Kg		08/28/95 1341	



Attachment B

LABORATORY REPORT
LAGUNA, NEW MEXICO

Site No. 3

Drum 2

Parameter	Result
F-Listed Solvents (mg/kg)	
Tetrachloroethylene	1.7
Trichloroethylene	21.2
Dichloromethane	33.7
1,1,1-Trichloroethane	23.40%
1,1,2-Trichloroethane	29.0
o-Dichlorobenzene	1.6
Xylene	285.0
Ethylacetate	11.8
Ethylbenzene	52.1
Ethylether	3.8
Benzene	14.8
Heating Value (BTU/lb)	17,463.0
TOX (%)	9.9
Barium (mg/kg)	28.0
Cadmium (mg/kg)	0.03
Selenium (mg/kg)	3.20

Attachment C

WATER
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17459 VILLAGE GREEN DRIVE
HOUSTON, TEXAS 77040
(713) 466-0958

ENVIRONMENTAL TESTING SPECIALISTS

Client Confidential
Attorney Work Product

March 27, 1989

Stephen J. Frost
Harding Lawson Associates
6220 Westpark Drive
Suite 100
Houston, TX 77057

LABORATORY REPORT

Project: Job 18996,001.12 Jaffe/Site No. 3
Sample Type: Solvent Sample ID: Drum 2
Sample Date: 03/09/89 Date Received: 03/13/89
WQS ID: 1224

Parameter	Result	MDL	Date	Analyst
TPH, %	66.9	1	3/22/89	AF
PCB, mg/l	<10.0	10.0	3/14/89	TW
F-Listed Solvents, mg/kg				
Tetrachloroethylene	1.7			
Trichloroethylene	21.2			
Dichloromethane	33.7			
1,1,1-Trichloroethane	23.40%			
1,1,2-Trichloroethane	29			
Carbon Tetrachloride	<1.0			
1,1,2-Trichloro-1,2,2-Trifluoroethane	<1.0			
Chlorobenzene	<1.0			
o-Dichlorobenzene	1.6			
Xylene	285			
Acetone	<1.0			
Ethylacetate	11.8			
Ethylbenzene	52.1			
Ethylether	3.8			
Methyl Isobutyl Ketone	<10.0			
n-Butyl Alcohol	<5.0			
Cyclohexanone	<10.0			
Methanol	<1.0			
Cresols, total	<50			

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LABORATORY REPORT

Project: Job 18996,001.12 Jaffe/Site No. 3
Sample Type: Solvent Sample ID: Drum 2
Sample Date: 03/09/89 Date Received: 03/13/89
WQS ID: 1224

Parameter	Result	MDL	Date	Analyst
F-Listed Solvents (cont'd)				
Nitrobenzene	ND			
Methyl Ethyl Ketone	<5.0			
Carbon Disulfide	<1.0			
Isobutanol	<10.0			
Pyridine	<5.0			
Benzene	14.8			
2-Ethoxyethanol	ND			

ND = None Detected
* Interference

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: one in ten sample duplicates, method blank, and quarterly method performance against known samples. Analyses were performed using EPA 418.1, 624, 625, and SW846 3540,3550, and 8080.

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LABORATORY REPORT

Project: Job 18996,001.12 Jaffe/Site No. 3
Sample Type: Solvent Sample ID: Drum 2
Sample Date: 03/09/89 Date Received: 03/13/89
WQS ID: 1224

Parameter	Result	MDL	Date	Analyst
pH	6.4			
Flashpoint, °F	96			
Heating Value, BTU/lb	17,463			
TOX, %	9.9			
Ash, wt. %	0.50			
Specific Gravity, @ 60°F	0.9273			
Kinematic Viscosity, @ 64°F	32.5			
Sediment & Water, Vol. %	3.0/2.0			
Sulphur, %	0.947			

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: one in ten sample duplicates, method blank, and quarterly method performance against known samples. Analyses were performed using

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LABORATORY REPORT

Project: Job 18996,001.12 Jaffe/Site No. 3
Sample Type: Solvent Sample ID: Drum 2
Sample Date: 03/09/89 Date Received: 03/13/89
WQS ID: 1224

Parameter	Results	MDL	Date	Time	Analyst
Arsenic, mg/kg	<1.05	1.05			
Barium, mg/kg	28.0	0.24			
Cadmium, mg/kg	0.03	0.02			
Chromium, mg/kg	<0.10	0.10			
Lead, mg/kg	<0.10	0.10			
Mercury, mg/kg	<0.096	0.096			
Selenium, mg/kg	3.20	2.10			
Silver, mg/kg	<0.009	0.009			
Zinc, mg/kg	0.56	0.02			

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: one in ten sample duplicates, method blank, and quarterly method performance against known samples. Analyses were performed using EPA SW-846 1310, 3010, 3040, 7061, 7080, 7130, 7191, 7420, 7470, 7741, and 7760.

WATER QUALITY SERVICES

Anne Fidelman

Anne Fidelman
General Manager

cc: Mr. James L. Jaffe
Attorney at Law

LABORATORY REPORT
MOUNTAINAIR, NEW MEXICO

Site No. 2

3 Drums Trichloroethane

Parameter	Result
F-Listed Solvents (mg/kg)	
Tetrachloroethylene	4.4
Trichloroethylene	0.99%
1,1,1-Trichloroethane	55.09%
1,1,2-Trichloroethane	17.1
Carbon Tetrachloride	9.4
Chlorobenzene	3.4
Xylene	1.06%
Ethylacetate	566.0
Ethylbenzene	29.6
Ethylether	343.0
Cyclohexanone	41.1
Methanol	3.7
Methyl Ethyl Ketone	859.0
Carbon Disulfide	134.0
Isobutanol	701.0
Benzene	0.49%
Heating Value (BTU/lb)	14,015.0
TOX (ppm)	30.8
Cadmium (mg/kg)	0.04
Lead (mg/kg)	0.41
Selenium (mg/kg)	0.39

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March 27, 1989

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LABORATORY REPORT

Project: Job 18996,001.12 Jaffe/Site No. 2
Sample Type: Solvent Sample ID: 3 Drums Trichloroethane
Sample Date: 03/08/89 Date Received: 03/13/89
WQS ID: 1216

Parameter	Result	MDL	Date	Analyst
TPH, %	45.3	1	3/22/89	AF
PCB, mg/l	<10.0	10	3/21/89	TW
F-Listed Solvents, mg/kg				
Tetrachloroethylene	4.4			
Trichloroethylene	0.99%			
Dichloromethane	294			
1,1,1-Trichloroethane	55.09%			
1,1,2-Trichloroethane	17.1			
Carbon Tetrachloride	9.4			
1,1,2-Trichloro-1,2,2-Trifluoroethane	<1.0			
Chlorobenzene	3.4			
o-Dichlorobenzene	<1.0			
Xylene	1.06%			
Acetone	5.5			
Ethylacetate	566			
Ethylbenzene	29.6			
Ethylether	343			
Methyl Isobutyl Ketone	<1.0			
n-Butyl Alcohol	<1.0			
Cyclohexanone	41.1			
Methanol	3.7			
Cresols, total	<50			

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March 27, 1989

LABORATORY REPORT

Project: Job 18996,001.12 Jaffe/Site No. 2
Sample Type: Solvent Sample ID: 3 Drums Trichloroethane
Sample Date: 03/08/89 Date Received: 03/13/89
WQS ID: 1216

Parameter	Result	MDL	Date	Analyst
F-Listed Solvents (cont'd)				
Nitrobenzene	ND			
Methyl Ethyl Ketone	859			
Carbon Disulfide	134			
Isobutanol	701			
Pyridine	<10.0			
Benzene	0.49%			
2-Ethoxyethanol	ND			

ND = None Detected
* Interference

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: one in ten sample duplicates, method blank, and quarterly method performance against known samples. Analyses were performed using EPA 418.1, 624, 625, and SW846 3540,3550, and 8080.

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March 27, 1989

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LABORATORY REPORT

Project: Job 18996,001.12 Jaffe/Site No. 2
Sample Type: Solvent Sample ID: 3 Drums Trichloroethane
Sample Date: 03/08/89 Date Received: 03/13/89
WQS ID: 1216

Parameter	Result	MDL	Date	Analyst
pH	6.4			
Flashpoint, °F	<75			
Heating Value, BTU/lb	14,015			
TOX, ppm	30.8			
Ash, wt. %	0.0008			
Specific Gravity, @ 60°F	0.9729			
Kinematic Viscosity, @ 64°F	10.0			
Sediment & Water, Vol. %	.05/0			
Sulphur, %	1.979			

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: one in ten sample duplicates, method blank, and quarterly method performance against known samples. Analyses were performed using

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March 27, 1989

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LABORATORY REPORT

Project: Job 18996,001.12 Jaffe/Site No. 2
Sample Type: Solvent Sample ID: 3 Drums Trichloroehtane
Sample Date: 03/08/89 Date Received: 03/13/89
WQS ID: 1216

Parameter	Results	MDL	Date	Time	Analyst
Arsenic, mg/kg	<0.98	0.98			
Barium, mg/kg	<0.22	0.22			
Cadmium, mg/kg	0.04	0.02			
Chromium, mg/kg	<0.10	0.10			
Lead, mg/kg	0.41	0.10			
Mercury, mg/kg	<0.074	0.074			
Selenium, mg/kg	0.39	0.39			
Silver, mg/kg	<0.008	0.008			
Zinc, mg/kg	<0.02	0.02			

Quality Assurance: These analyses are performed in accordance with EPA guidelines for quality assurance. These procedures include the following as a minimum requirement: one in ten sample duplicates, method blank, and quarterly method performance against known samples. Analyses were performed using EPA SW-846 1310, 3010, 3040, 7061, 7080, 7130, 7191, 7420, 7470, 7741, and 7760.

WATER QUALITY SERVICES

Anne Fidelman

cc: Mr. James L. Jaffe
Attorney at Law

Anne Fidelman
General Manager

Events And Correspondence Chronology
Roswell Station Remediation Project
Transwestern Pipeline Company

Revised 8/24/95 (most recent revisions are in bold type)

8/60	Compressor station begins operations.
Prior to 10/72	Pit 1 is constructed to replace Pit 2.
6/73-4/81	Period during which Pit 2 and Pit 3 (if Pit 3 existed) are back-filled. **The timeframe is based on a review of air photos.**
6/82	**The 210 bbl. waste lube oil tank is placed in service. No releases of waste lube oil after this date.**
11/83	**The 500 bbl. pipeline liquids tank is placed in service. No releases of pipeline liquids after this date. In addition, the scrubbers, the wash rack, and the engine room floor drains are tied into the 500 bbl pipeline liquids tank at this time.**
11/83	**Last use of surface impoundments. No releases to surface impoundments after this date.**
12/31/85	F001, F002, F004, & F005 wastes redefined to include mixtures & blends of listed wastes.
6/86	Pit 1 back-filled.
4/90	Transwestern requests permission from the State of New Mexico Office of the Commissioner of Public Lands to drill exploratory borings on State Trust land in order to collect soil samples to assess soil contamination.
4/2/90	State of New Mexico Office of the Commissioner of Public Lands (Surface Water Resources Division) authorizes Transwestern to drill exploratory borings on State Trust land for the purpose of obtaining soil samples to be tested for contamination.
6/20/91	Harding Lawson Associates completes shallow soil vapor investigation at Compressor Station No. 9.
7/17/91	Transwestern requests authorization to drill additional soil borings on State Trust land northeast of the compressor station.
7/22/91	State of New Mexico Office of the Commissioner of Public Lands (Surface Water Resources Division) authorizes Transwestern to drill approximately 15 soil borings to allow collection of soil samples.
12/91	Metric Corporation completes report on a shallow subsurface investigation at the compressor station.
2/14/92	Larry Campbell (Transwestern) meets with Coby Muckelroy and Bruce Swanton (New Mexico Environment Department [NMED]) to discuss closure of surface impoundment at Compressor Station No. 9.
2/14/92	Larry Campbell (Transwestern) meets with Roger Anderson (Oil Conservation Division [OCD]) to discuss closure of surface impoundment at Compressor Station No. 9.
4/29/92	Bruce Swanton (NMED) calls Larry Campbell (Transwestern) to request additional information regarding the former surface impoundments.

Attachment D

5/6/92 Joint meeting attended by Transwestern, NMED and OCD. Transwestern states intention to hire Halliburton-NUS Corporation to install a monitor well in the center of the former pit to remove and test liquids to determine their status as hazardous or non-hazardous waste. Field work scheduled to begin July 20, 1992.

7/92 Monitor well MW-1 installed by Halliburton-NUS Environmental Corporation.

10/92 Halliburton NUS completes report on monitor well installation at the compressor station.

10/15/92 Joint meeting attended by Transwestern, NMED and OCD. Transwestern presents the results of sampling and analysis of the new monitor well. Options for closure of the site are discussed.

11/30/92 Transwestern submits duplicate copies of a RCRA Part A permit application to NMED and OCD.

12/10/92 Joint meeting attended by Transwestern, NMED and OCD to discuss remediation and closure activities at former surface impoundments. NMED requests that the RCRA Part A permit application submitted previously be resubmitted using the proper EPA forms. The schedule for submittal of other documents and information is also discussed.

1/5/93 Transwestern resubmits RCRA Part A permit application using the EPA forms.

1/25/93 Transwestern notifies NMED that monitor wells will be installed to determine ground-water quality beneath the former surface impoundments.

2/7/93 Transwestern provides NMED with historical information on the use of the former surface impoundments.

2/17/93 Transwestern meets with NMED to discuss remediation and closure of the surface impoundment.

2/17/93 Transwestern requests permission from the State of New Mexico Office of the Commissioner of Public Lands to install two monitor wells on State Trust land in order to collect ground-water samples.

2/17/93 NMED requests that Transwestern submit a closure plan in accordance with the New Mexico Hazardous Waste Management Regulations, Part VI, Section 40 CFR 265.112(a). NMED also provides Transwestern with a list of Deficiency Comments related to NMED review of the RCRA Part A permit application previously submitted and requests that a new or amended Part A application be submitted within 30 days.

3/10/93 Transwestern requests NMED to grant a 60-day extension (until July 1, 1993) for filing the closure plan.

3/16/93 George Robinson (Cypress Engineering Services) meets with Larry Campbell (Transwestern) to discuss conclusions of Metric Report.

4/6/93 NMED grants extension for filing of closure plan.

4/7/93 Transwestern submits amended RCRA Part A permit application to NMED, along with a list of responses to NMED review comments on the previous permit application.

5/19/93 Larry Campbell and Lou Soldano (Transwestern) meet with NMED to discuss NMED request for closure plan for the surface impoundments. NMED requests information regarding the proposed installation of a product recovery pump.

5/21/93 Product recovery pump installed in MW-1. Interim corrective action begins by pumping product from MW-1 into aboveground storage tank.

6/11/93 Transwestern notifies the State of New Mexico Office of the Commissioner of Public Lands that remediation operations are in progress at the compressor station.

6/22/93 Brown & Root Environmental completes a report for Transwestern describing a ground-water assessment at the compressor station.

7/1/93 Larry Campbell (Transwestern) delivers closure plan to NMED. Transwestern begins free product recovery from recovery wells MW-1B, MW-2, and RW-1.

9/7/93 Transwestern notifies OCD of the installation of product recovery pumps in three monitor wells as part of ground-water cleanup and requests associated modifications to Discharge Plan GW-52.

9/22/93 OCD requests additional information regarding the design of the product recovery system prior to approving modifications to Discharge Plan GW-52.

10/25/93 Transwestern responds to comments from OCD regarding the product recovery system.

11/18/93 OCD approves Transwestern's proposed modifications to Discharge Plan GW-52 in accordance with ongoing remedial activities.

3/7/94 Transwestern receives a letter from NMED rejecting closure plan previously submitted on July 1, 1993, on the grounds that it is incomplete. NMED includes Notice of Deficiency listing items to be included in the closure plan.

3/23/94 Cypress Engineering Services removes inoperative product recovery pump from MW-1 and collects ground-water samples from MW-3 and MW-5.

4/5/94 George Robinson (Cypress Engineering Services) prepares letter report to Bill Kendrick (Enron Operations Corporation) discussing soil and ground-water quality at the Roswell compressor station.

4/8/94 Larry Campbell (Transwestern), Bill Kendrick (Enron Operations Corporation), and George Robinson (Cypress Engineering Services) meet with NMED to discuss Notice of Deficiency. NMED requests that another closure plan be submitted by June 1, 1994.

4/15/94 Brown & Caldwell installs new product recovery pump in MW-1 and measures depth to PSH and depth to ground water in MW-1, MW-1B, MW-2, and RW-1.

5/18/94 George Robinson (Cypress Engineering Services) and Jeffrey Forbes (DBS&A) meet with Marc Sides (NMED) to discuss closure plan format.

5/31/94 Closure Plan for Roswell Compressor Station Surface Impoundments submitted to NMED Hazardous and Radioactive Materials Bureau (HRMB).

8/4/94 Terry Davis, Marc Sides, and Cornelius Amindyas of the NMED meet with Larry Campbell (Transwestern), Bill Kendrick (Enron Operations Corporation), and George Robinson (Cypress Engineering Services) at the Roswell Station site to gather information for a RCRA Facility Assessment.

9/9/94 NMED HRMB delivers a copy of the RCRA Facility Assessment to David Neleigh, RCRA Permits Section Chief, EPA Region VI.

9/28/94 NMED HRMB issues Notice of Deficiency (NOD) to Transwestern for closure plan dated May 31, 1994, including a list of NMED comments and requests for additional information. NMED gives Transwestern 30 days to revise the closure plan in response to their comments.

11/1/94 Bill Kendrick (Enron Operations Corporation) and George Robinson (Cypress Engineering Services) meet with NMED to discuss Notice of Deficiency dated September 28, 1994. NMED requests that Transwestern (1) submit request for extension of the closure plan due date, (2) evaluate the potential to collect and analyze ground-water samples from off-site wells and the deep on-site well (TW-1), and (3) revise the closure plan in accordance with NMED comments.

11/9/94 Transwestern requests a 75-day extension of the due date for the revised closure plan. Included with the letter is an attachment describing the procedure and method for installation of an upgradient monitor well.

11/16/94 Transwestern submits to the NMED HRMB the first status report of interim corrective measures covering the month of October 1994.

11/28/94 Transwestern presents arguments for the continued use of the MW-1 phase separated hydrocarbon recovery well.

12/1/94 Transwestern installs upgradient monitor well MW-6 approximately 500 feet southwest of the former surface impoundments. A ground-water sample collected by DBS&A from this well is submitted for laboratory analysis in accordance with procedures outlined in Transwestern's letter dated November 9, 1994. All existing on-site monitor wells are resurveyed.

12/2/94 Clayton Barnhill and George Robinson accurately locate off-site wells using Magellen GPS Satellite Navigator.

12/16/94 Transwestern receives letter from NMED dated December 8, 1994, granting a 75-day extension of closure plan due date until January 16, 1995. Also included are NMED's comments on Transwestern's procedures and methods for installation of the upgradient monitor well.

12/20/94 Transwestern sends letter to NMED HRMB describing proposed ground-water sampling and analysis for off-site wells.

12/22/94 Ground-water samples are collected by DBS&A from on-site deep well TW-1 and off-site Well #5 for laboratory analysis of Appendix IX constituents.

1/3/95 NMED HRMB accepts Transwestern's arguments for the continued use of recovery well MW-1.

1/11/94 Transwestern submits to the NMED HRMB status report of interim corrective measures covering the fourth quarter 1994.

1/16/95 Transwestern submits revised closure plan to NMED HRMB.

2/21/95 NMED HRMB delivers a copy of the RCRA Facility Assessment to Larry Campbell (Transwestern).

3/30/95 Bill Kendrick (Enron Operations Corporation), George Robinson (Cypress Engineering Services), Jeff Forbes (Daniel B. Stephens & Associates), and Kathleen O'Rielly (an independent consultant) meet with Barbara Hoditschek, Ron Kern, Terry Davis, and Cornelius Amindyas of the NMED HRMB to discuss the technical deficiencies of the most recent closure plan. The NMED requests Transwestern to submit additional information regarding waste characterization. The NMED also indicates to Transwestern that the NMED will modify other parts of the closure plan the NMED finds deficient and then submit the modified closure plan for public notice.

3/31/95 Bill Kendrick (Enron Operations Corporation), and George Robinson (Cypress Engineering Services) meet with Roger Anderson (NMOCD) and Bill Olson (NMOCD) to discuss several ongoing investigation and remediation projects at Transwestern facilities including the Roswell Station. Mr. Anderson indicates that the NMED HRMB is not copying the NMOCD on correspondence.

4/28/95 Barbara Hoditschek (NMED) sends a letter to Larry Campbell (Transwestern) requesting additional information is provided for inclusion into the closure within seven days of receipt of the request.

5/1/95 Transwestern obtains the assistance of outside legal counsel to assist in an evaluation of the regulatory status of the Roswell Station facility and remediation activities.

5/10/95 Bill Kendrick (Enron Operations Corporation) in a letter to Barbara Hoditschek (NMED), responds to the NMED's 4/28/95 request.

5/30/95 Bill Kendrick (Enron Operations Corporation) in a letter to Barbara Hoditschek (NMED), presents a summary of the issues discussed during the 3/30/95 meeting.

6/1/95 Richard Virtue (Transwestern's outside legal counsel) in a letter to Tracy Hughes (NMED General Counsel), requests that the NMED General Counsel review the NMED HRMB's decision to require a RCRA permit for closure activities at the site.

6/20/95 Benito Garcia (NMED HRMB) in a letter to Larry Campbell (Transwestern), responds to Transwestern's 6/1/95 request for a review of NMED's decision to require a RCRA permit.

6/30/95 Bill Kendrick (Enron Operations Corporation) in a letter to Barbara Hoditschek (NMED), informs the NMED of Transwestern's intent to implement a self-directed Phase I Soil and Ground Water Assessment.

7/13/95 Barbara Hoditschek (NMED) sends a letter to Bill Kendrick (Enron Operations Corporation) transmitting a copy of the NMED modified closure plan. Comments are requested by 7/27/95.

7/26/95 Bill Kendrick (Enron Operations Corporation) in a letter to Barbara Hoditschek (NMED), transmits Transwestern's comments to the modified closure plan.

8/8/95 **Bill Kendrick (Enron Operations Corporation), Lou Soldano (EOC Legal), Richard Virtue (EOC Outside Counsel), and George Robinson (CES) meet with Tracy Hughes (NMED General Counsel), Bonito Garcia (HRMB Bureau Chief), Ron Kern (HRMB Technical Compliance Program Manager), Teri Davis (NMED HRMB Technical Compliance), and Cornelius Amindyas (HRMB Permits) of the NMED to discuss TW's re-evaluation of regulatory status of the remediation activities. Transwestern agrees to provide a written statement and supporting information for TW's position that the former surface impoundments were not, nor ever were, hazardous waste management units.**

8/23/95 **Daniel B. Stephens & Associates completes the Phase I Soil and Ground Water Assessment field activities in which soil samples were collected from the area of the former surface impoundments, three ground water monitor wells were installed downgradient of the former surface impoundments, and ground water samples were collected from three on-site and the three newly installed off-site monitor wells.**

8/24/95 **Cornelius Amindyas (HRMB Permits) of the NMED calls Bill Kendrick (Enron Operations Corporation) to request a target date for submittal of TW's written statement regarding regulatory status of the former surface impoundments. Bill Kendrick informs him that TW has set a target date of September 15, 1995.**

1204
Rev. 3-81

TEXAS EASTERN TRANSMISSION CORPORATION AND SUBSIDIARIES

COMPLETION REPORT

E. E. No. _____
Prelim. Ref. No. 567-586
Docket/Proj. No. 82-110
Code No. 1-0

Transwestern Pipeline Company
Company Name

AFE No. 23018

Company No. 09

Gas Western - Approp. #10/23/81-04
Profit or Cost Center

☒ Property Addition	☐ Preliminary Investigation	☐ Research & Development	☐ Other Work	☐ Property Retirement	☐ Other (Specify)

TITLE Install 500 Bbl. Pipeline Waste Tank & Related Equipment

LOCATION Compressor Station No. 9 - Roswell, N. M. 30-1-7119 District III

Date Started 11-4-82 Date in Service 11-11-83 Date Completed 11-11-83

Related AFE No. _____

Drawings Attached To BE SENT AT A LATER DATE (a)

Other Ref. Swg's (Not Attached) _____

MATERIAL OR RECEIVING REPORTS ISSUED

See TW-112

ORIGINAL MAILED
FEB - 2 1984
TO HOUSTON OFFICE

REMARKS:

ENGINEERING SERVICES		OPERATIONS	
Prepared by:	Date:	Prepared by: B. Frank Smith	Date: 1-25-84
Verified by:	Date:	Verified by: Francis M. Cox	Date: 1-25-84
Manager Plant Records	Date:	Approved by:	Date: 2-2-84
Manager Materials Management:	Date:	Approved by:	Date:
General Manager Administration			

Attachment E

1203

Texas Eastern Transmission Corporation and Subsidiaries

Preliminary Completion Report

E. E. No. _____
Prelim. Ref. No. 567-586
Docket/Proj. No. 82-110
Code No. _____

TRANSWESTERN PIPELINE COMPANY
Company Name

GAS WESTERN - APPROP. #10/23/81-04
Profit or Cost Center

AFE No. 23018

Company No. 09

XX Property Addition	☐ Property Retirement

TITLE INSTALL 500 BBL. PIPELINE WASTE TANK & RELATED EQUIPMENT

LOCATION COMPRESSOR STATION NO. 9 - ROSWELL, N. M. 30-1-7119 DISTRICT III

Date Work Started _____

Date Work Completed (See Note A) 11-4-82

Date Work Placed in Service (See Note A) 11-11-83

NOTE A — Only one date is necessary, either date all work is completed or date work is placed in service, whichever is earlier. On "Property Retirement" date last part of line lifted or equipment dismantled will be date work completed.

NOTE—Briefly outline work necessary to complete. ESTIMATED FINAL COMPLETION DATE _____

REMARKS:

ORIGINAL MAILED
NOV 17 1983
TO HOUSTON OFFICE

Construction Foreman	Date:		
FRANCIS M. COX F.M. Cox	11-14-83		
Division Engineer	Date:	Division Manager	Date:
C. DAVIS	11/14/83		

TEXAS EASTERN
OR SUBSIDIARIES

INVOICE IN TRIPLICATE TO:

TRANSWESTERN PIPELINE CO.
ACCOUNTING DEPARTMENT
P.O. BOX 2521
HOUSTON, TEXAS 77001

SHIP TO: 09-35-40
TRANSWESTERN PIPELINE COMPANY
HWY 285 NORTH
P. O. BOX 2018
ROSWELL, NEW MEXICO 88201
CARE OF: J.V. HENDRICKS
VENDOR: 451912
PATTERSON WELDING WORKS, INC.
1803 BRISCOE
ARTESIA, NEW MEXICO 88210

PURCHASE ORDER

NO 09-048152 A ☐

THIS PURCHASE ORDER NUMBER MUST BE SHOWN ON INVOICE, TAG, BOX, BILL OF LADING OR EXPRESS RECEIPT.

DATE OF ORDER	DATE REQUIRED
12-13-82	12-01-82

STATE SALES/USE TAX INSTRUCTIONS
- [X] TAXABLE-STATE OF NM
- [ ] TAX EXEMPT-SEE NOTE BELOW
- [ ] SERVICES-NONTAXABLE

SHIP PREPAID AND [ ] ADD [X] ALLOW VIA VENDOR

F.O.B. DESTINATION

TERMS NET 30 DAYS

A.F.E. NO. | PROJECT DESCRIPTION | PROJECT NO. | JOB NO. | M&S ACCT.

PO. ITEM	BM ITEM	CATALOG NO.	QUAN. REC'D	QUANTITY	UNIT	DESCRIPTION	UNIT PRICE	SCHEDULED SHIPPING DATE	PRR NO
01			1	1	LT	LABOR & MATERIAL TO FABRICATE & INSTALL 1 EA. TANK, 500 BBL. MATERIALS TO INCLUDE: 12' DIAMETER X 25' HIGH, 1/4" THICK STEEL PLATE BOTTOM, 3/16" THICK STEEL SIDE, WALLS, & TOP. SHELL & DECK COMPLETE WITH STANDARD CONNECTIONS. ACCESSORIES INCLUDED ARE: 8" ROUND THIEF HATCH, 24" X 36" CLEAN OUT, OUTSIDE LADDER, 4" CONNECTIONS; 2" DRAIN LINE, 1" ROLLINE CONNECTIONS. THREE SECTIONS OF SIGHT GLASS (BEGINNING 4" FROM BOTTOM) CONF TO ED PATTERSON 12/13/82 OU 567-9-407-8-230-1-8-26-12-3-5-41	4350.00	12-20-82	

REQUISITION NO. 9-82-23018-5
REQUESTED BY F.H. COX
BUYER JDB
TYPIST LS
TRANSPORTATION RECEIPT VIA: RED LAKE TRUCKING NO. DATE

INTENDED USE OF MATERIAL
F/L WASTE STORAGE TANK F/STA #9 AFE 23018 OU SEE ABOVE

ACCOUNT NUMBER

ORG. UNIT	DIV.	GENERAL	MAJOR	MINOR	COST ELEM.	DEBIT	CREDIT

IF NO EXCEPTIONS SO INDICATE: NONE

AMOUNT PREPAID ☐ COLLECT ☐ IF COLLECT, HOW PAID

RECEIVED BY J. W. BRANCH jvh DATE 1-14-83

APPROVALS DATE

COPY No. 6
FIELD OFFICE FILE

1135
Rev. 12-81

TEXAS EASTERN CORPORATION AND SUBSIDIARIES

AUTHORIZATION FOR EXPENDITURES

E. E. No.
Preliminary Project No. 567-586
Docket/Project No. 82-110
Code No. 1-0

Transwestern Pipeline Company
Company Name

Gas Western - Approp. #10/23/81-04
Profit or Cost Center and Appropriation Reference No.

AFE No. 23018

Company No. 09

☒ Property Addition	☐ Other Work	☐ Research & Development	☐ Property Retirement	☐ Other (Specify)

TITLE
Install 500 Bbl. Pipeline Waste Tank & Related Equipment — Roswell Manager

LOCATION
Compressor Station No. 9 - Roswell, N. M. — 30-1-7119 — District III

DESCRIPTION
Install 500 bbl. pipeline waste tank with vent, flame arrestor & sight gauge on 6" concrete pad. Install ramp, curb & drain on existing concrete slab at pig receiver & install 10 bbl. fabricated collection tank with pump to transfer waste from collection tank to 500 bbl. tank. Fabricate & install pig trap muffle to separate waste from pig trap blowdown gas. Install pump at pig trap muffler to transfer waste from muffler to 500 bbl. waste storage tank. (See attached drawings).

FERC 1-12 - 4

In 1982 Budget: Yes

Related Prelim. No.: None
Related AFE Number: None — OPERATIONS A. F. E.

PURPOSE & NECESSITY

Provide safe handling for pipeline waste.

TW-112, 1203 & 1204 to be completed by: Frank Smith

Work to Begin 7/01/82
Work to be Completed 12/31/82

Work to Be Done by: ☒ Company Personnel ☒ Contractor

Material Costs . . . . . $ 23,925
Installation Costs . . . . . $ 17,300
AUTHORIZED AMOUNT. . . . . $ 41,225

A.S. No.99 *For Comptroller Division Use Only*
Status of Appropriation:
Total Appropriation . . . . . $ 12,360,000
Deduct: Previous AFE's . . . . . $ 5,567,549
This AFE. . . . . $ 41,225
Remaining Appropriation . . . . . $ 6,751,226

Prepared by:	Date:		Date:
Francis M Cox	5-3-82		
Verified by:	Date:	Tax Department Review by:	Date:
P. L. Paxton	6/2/82	R. D. Jones	7/14/82
Engineering Services Division Approval: NOT REQUIRED	Date:	Accounting Department Review by: Daniel Grado	Date: 7-19-82
Group or Division Authorization: Ed Robinson	Date: 7/14/82	Comptroller Division Approval: O. D. Thurman	Date: 7/20/82

1135
Rev. 12-81

TEXAS EASTERN CORPORATION AND SUBSIDIARIES

AUTHORIZATION FOR EXPENDITURES

E. E. No.
Preliminary Project No. 567-586
Docket/Project No.
Code No.

Transwestern Pipeline Company
Company Name

Gas Western - Approp. #10/23/81-04
Profit or Cost Center and Appropriation Reference No.

AFE No. 23018

Company No. 09

☒ Property Addition	☐ Other Work	☐ Research & Development	☐ Property Retirement	☐ Other (Specify)

TITLE
Install 500 Bbl. Pipeline Waste Tank & Related Equipment — Roswell Manager

LOCATION
Compressor Station No. 9 - Roswell, N. M. — District III

DESCRIPTION
Install 500 bbl. pipeline waste tank with vent, flame arrestor & sight gauge on 6" concrete pad. Install ramp, curb & drain on existing concrete slab at pig receiver & install 10 bbl. fabricated collection tank with pump to transfer waste from collection tank to 500 bbl. tank. Fabricate & install pig trap muffle to separate waste from pig trap blowdown gas. Install pump at pig trap muffler to transfer waste from muffler to 500 bbl. waste storage tank. (See attached drawings).

In 1982 Budget: No
Budgeted Amount: None
Related Prelim. No.: None
Related AFE Number: None

OPERATIONS A. F. E.

PURPOSE & NECESSITY

Provide safe handling for pipeline waste.

TW-112, 1203 & 1204 to be completed by: Frank Smith

Work to Begin 7/01/82
Work to be Completed 12/31/82

Work to Be Done by: ☒ Company Personnel ☒ Contractor

Material Costs . . . . . $ 23,925
Installation Costs . . . . . $ 17,300
AUTHORIZED AMOUNT . . . . . $ 41,225

For Comptroller Division Use Only
Status of Appropriation:
Total Appropriation . . . . . $
Deduct: Previous AFE's . . . . . $
This AFE . . . . . $
Remaining Appropriation . . . . . $

ORIGINAL MAILED
JUN - 3 1982
TO HOUSTON OFFICE

Prepared by: Francis M Coy	Date: 5-3-82		Date:
Verified by: R. L. Langston	Date: 6/2/82	Tax Department Review by:	Date:
Engineering Services Division Approval:	Date:	Accounting Department Review by:	Date:
Group or Division Authorization:	Date:	Comptroller Division Approval:	Date:

Form No. 1136

Texas Eastern Transmission Corporation and Subsidiaries

ESTIMATED TIMING OF EXPENDITURES

E. E. No. _____ Transwestern Pipeline Company (Company Name) AFE No. _____

Prelim. Ref. No. 567-586 Company No. 09

Gas Western - Approp. #10/23/81-04
Profit or Cost Center and Appropriation Reference No.

☒ Property Addition	☐ Preliminary Investigation	☐ Research & Development	☐ Other Work	☐ Advances For Gas	☐ Property Retirement	☐ Other (Specify)

YEAR 1982

January	$ _____
February	_____
March	_____
April	_____
May	_____
June	_____
July	5,000
August	7,245
September	7,245
October	7,245
November	7,245
December	7,245
Total for the year	$ 41,225

YEAR _____

January	$ _____
February	_____
March	_____
April	_____
May	_____
June	_____
July	_____
August	_____
September	_____
October	_____
November	_____
December	_____
Total for the year	$ _____

YEAR _____

January	$ _____
February	_____
March	_____
April	_____
May	_____
June	_____
July	_____
August	_____
September	_____
October	_____
November	_____
December	_____
Total for the year	$ _____

Grand Total (Authorized Amount) $ 41.225

ESTIMATE OF PROPERTY ADDITIONS

E. E. No. 567-586

AFE No.

Prepared By Francis M. Cox

Checked By

DESCRIPTION	MATERIAL	INSTALLATION	SUB-TOTALS	TOTALS
05 - Site Improvements				
107 Dikes	1,200	1,300	2,500	
TOTAL FEATURE 05				2,500
26 - Major Gas Piping				
101 Foundations	1,200	900	2,100	
123 Drain Lines	13,525	13,100	26,625	
Tanks	8,000	2,000	10,000	
TOTAL FEATURE 26				38,725
ESTIMATE TOTAL	23,925	17,300	41,225	41,225

1500
Rev. 6-77

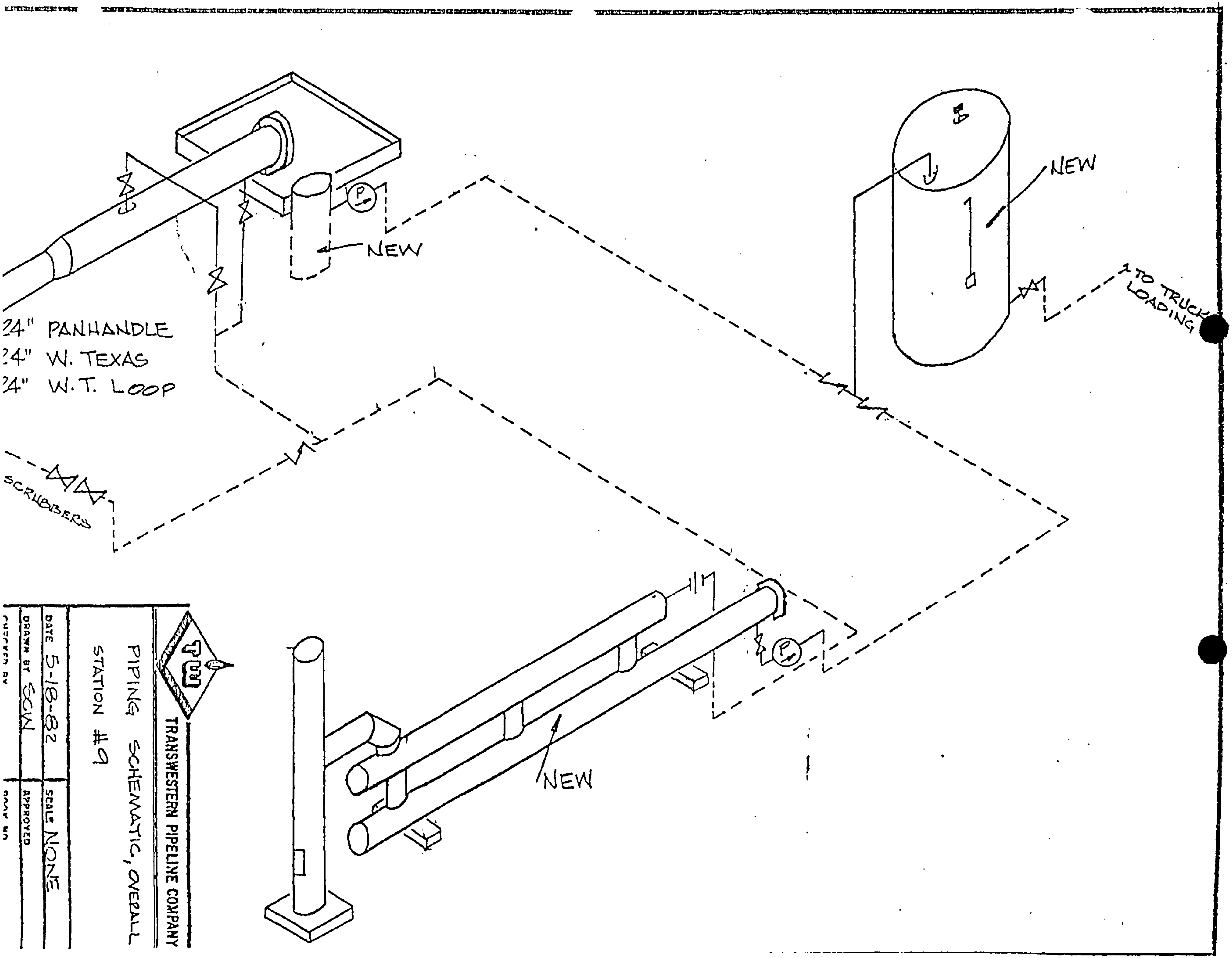
DISTRICT III WASTE STORAGE PROJECT

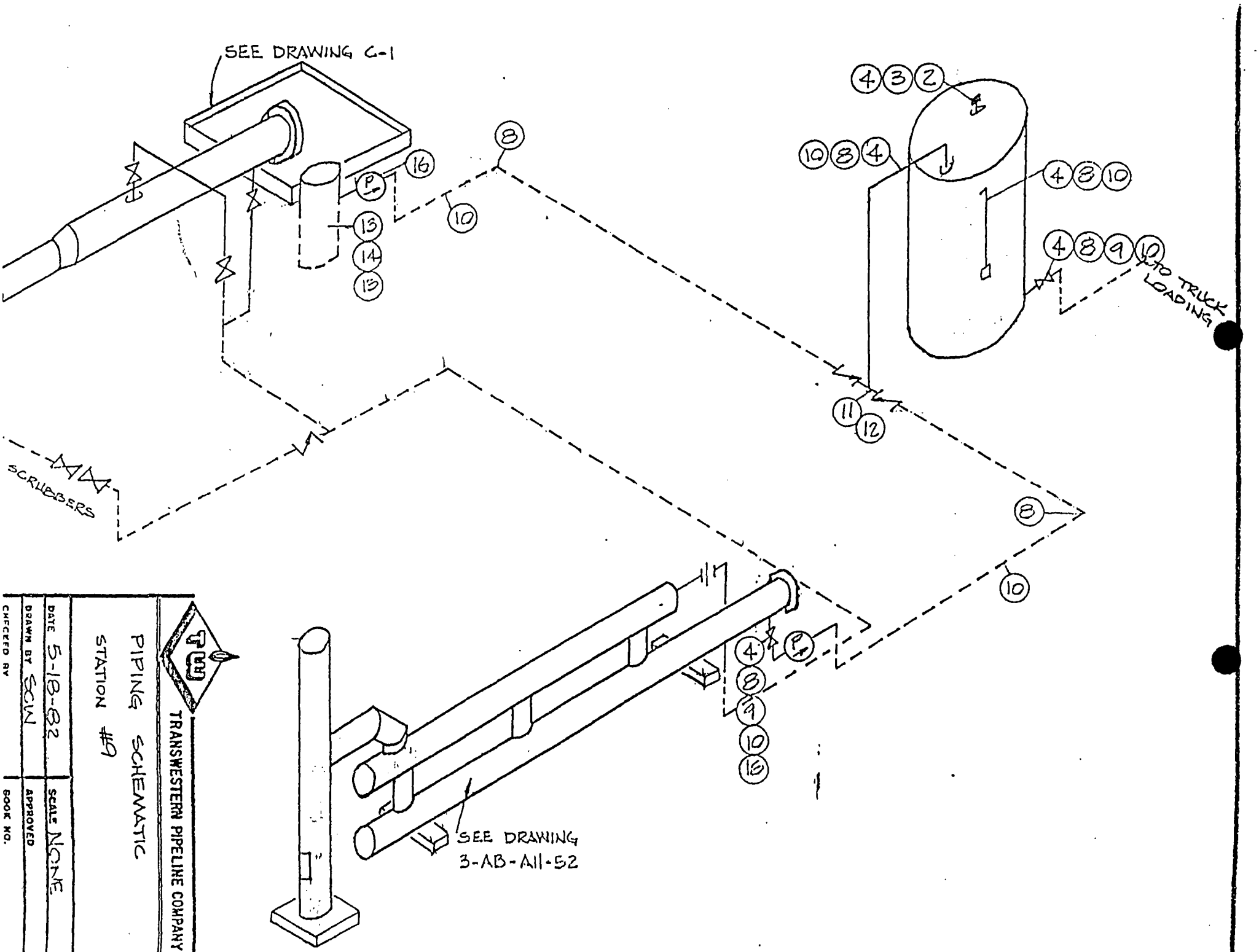
A. F. E. # JOB # FEATURE = SHEET A-1

BY

DATE

STATION	NEW/EXISTING	ITEM	LOCATION: N/S	E/W
9	EXISTING	PIG TRAP	N 8+10	E 1+10
24 "P.H.	EXISTING	PIG TRAP	N 9+30	E 2+10
24" W.T.	EXISTING	PIG TRAP	N 9+30	E 2+30
24" W.T.L.	NEW	MUFFLER	N 11+00	E 2+00
	NEW	TANK	N 11+00	E 1+00
WT-1	EXISTING	PIG TRAP	S 6+20	W 1+50
	EXISTING	PIG TRAP	S 6+90	W 3+04
	EXISTING	PIG TRAP	S 7+20	W 3+29
	NEW	MUFFLER	S 7+00	0+00
	NEW	TANK	S 6+50	E 1+00


NEW
NEW
TO TRUCK LOADING
24" PANHANDLE
24" W. TEXAS
24" W.T. LOOP
SCRUBBERS
NEW
TRANSWESTERN PIPELINE COMPANY
PIPING SCHEMATIC, OVERALL
STATION #9
DATE 5-18-82
SCALE NONE
DRAWN BY SCW
APPROVED


SEE DRAWING C-1
SCRUBBERS
TO TRUCK LOADING
SEE DRAWING 3-AB-A11-52
TRANSWESTERN PIPELINE COMPANY
PIPING SCHEMATIC
STATION #9
DATE 5-18-82
DRAWN BY SCW
SCALE NONE
APPROVED
CHECKED BY
BOOK NO.

BILL OF MATERIAL

Manufacturer to mark ALL EQUIPMENT as listed below, using both numbers, as example 46-1, 46-2, etc. SHEET A-4

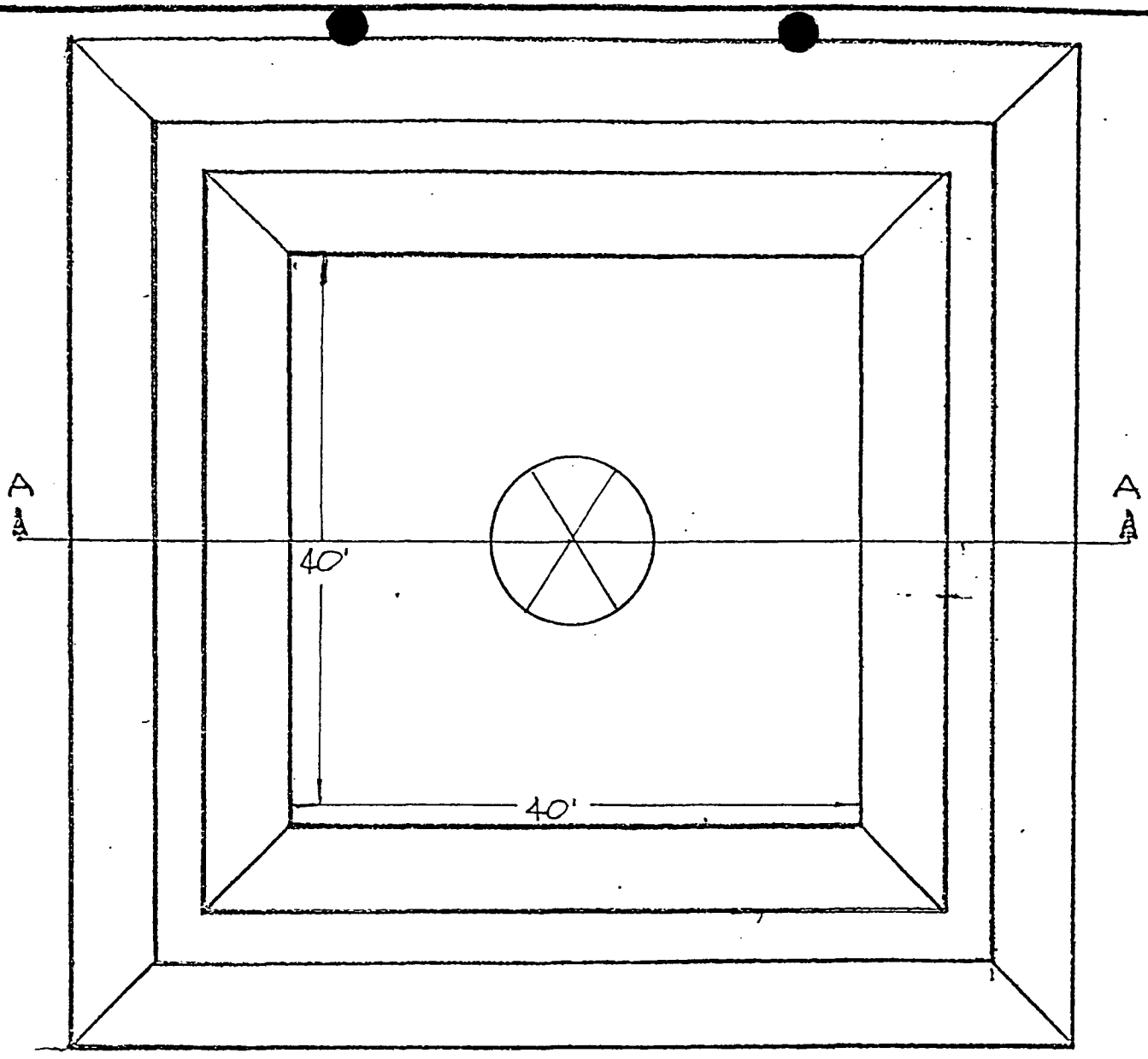
No. Reqd.	Size	Description	Item No.	Rem
1	500 BBL.	Tank, 15'-6" diameter x 16' high, 1/4" thick steel plate bottom, 3/16" thick steel side walls & top, shell & deck complete with standard connections, accessories included are: outside ladder, 8" round thief hatch, 24" x 36" clean-out, 4" connections; 2" drain line, 1" rolline connection, 2 sections of 36" sight glass (beginning 4" from bottom)	1	
1	2"	Vent, ANSI 150#, Groth Model 7613	2	
1	2"	Flange, RF, ANSI 150#, threaded	3	
4	2" x 6"	Nipple standard threaded	4	
1	6"	Flame arrestor, ANSI 150#, Groth Model 7618	5	
1	6"	Flange, RF ANSI 150#, threaded	6	
1	2" x 6"	Reducer, standard, concentric, threaded	7	
12	2"	ELL, 90° LR, standard, threaded	8	
1	2"	Valve, gate, ANSI 150#, threaded	9	
pprox. 250'	2"	Pipe, 2.375" O.D. x 0.154 W.T., SCH 40, threaded	10	
1	2"	Tee, straight, standard, threaded	11	
2	2"	Valve, check, swing, ANSI 150#, threaded	12	

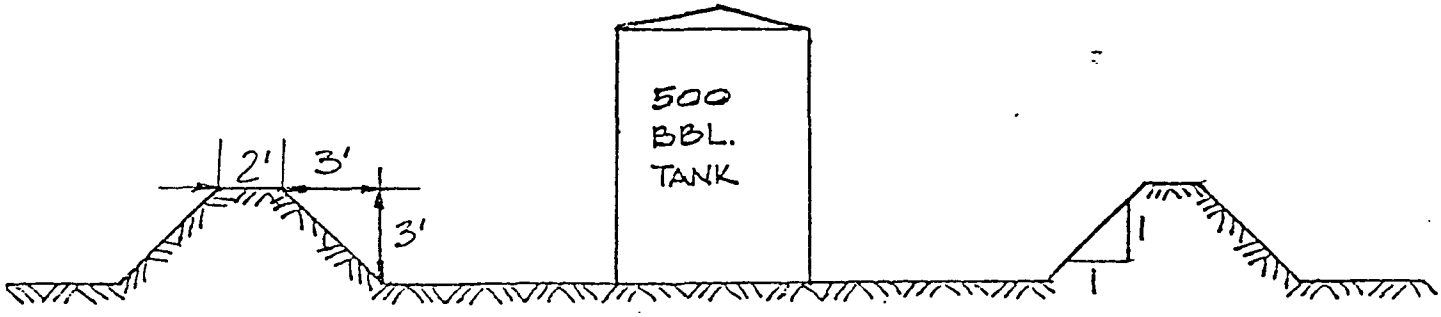
*SHOP FABRICATED FOR FIELD FIT

BILL OF MATERIAL

...ufacturer to mark ALL EQUIPMENT as listed below, using both numbers, as example 46-1, 46-2, etc. SHEET A-5

No. Reqd.	Size	Description	Item No.	Rem
1	10 BBL.	Sump, used steel pipe, 42" O.D. x 0.500 W.T., 84" high with 72" below grade, 1/4" steel plate bottom, inlet opening: welded to part 'C' on funnel channel (4" H x 6" W x 10" L welded together), outlet opening: to fit 2.375" pipe	13	Shop Fab.
1	43" Dia.	Cover, 1/4" steel plate, 1" welded edge, #4 smooth bar handles	14	Shop Fab.
1 *	See Drawing	Funnel channel with cover, 1/4" steel plate, welded joints.	15	Shop Fab.
		Part A: Top & bottom 7" x 12"		
		Sides 6" x 7"		
		Part B: Moving Clockwise		
		Slanted top 12" x 6.3" x 6" x 6.3"		
		Flat bottom 12" x 6" x 6" x 6"		
		Sides 6" x 6.3" x 4" x 6"		
		Part C: Top & bottom 6" x 10"		
		Sides 4" x 10"		
		Part D: Front 6" x 20"		
		Straps 2" x 7" & 2" x 3"		
		Handles Bent #4 Smooth Bar		
2	2"	Pump, Double-Diaphragm	16	



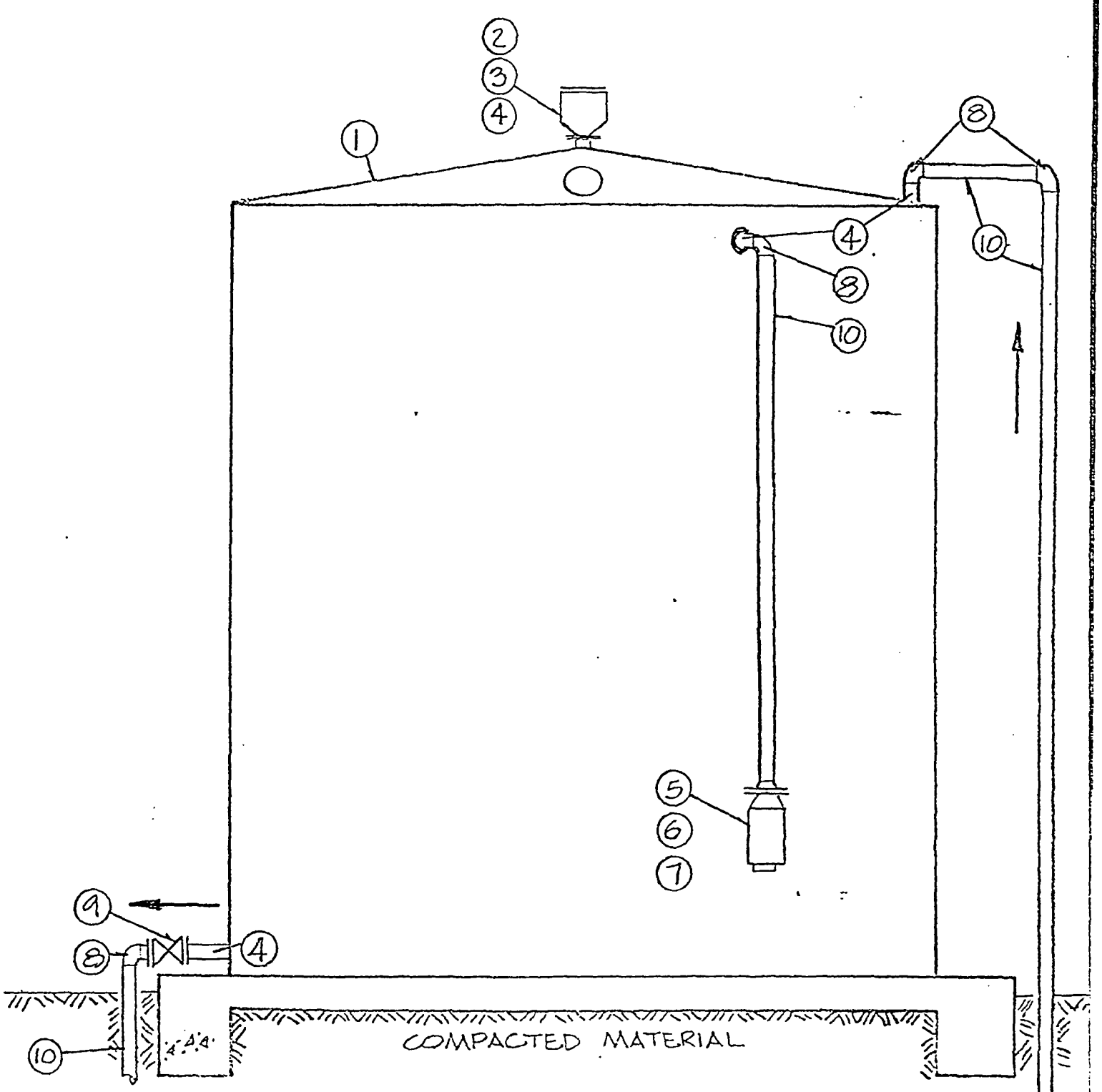


SECTION A-A

TRANSWESTERN PIPELINE COMPAN

EARTHEN DIKE
STATION: NINE

DATE 5-3-82	SCALE NONE
DRAWN BY SOW	APPROVED
CHECKED BY	BOOK NO.

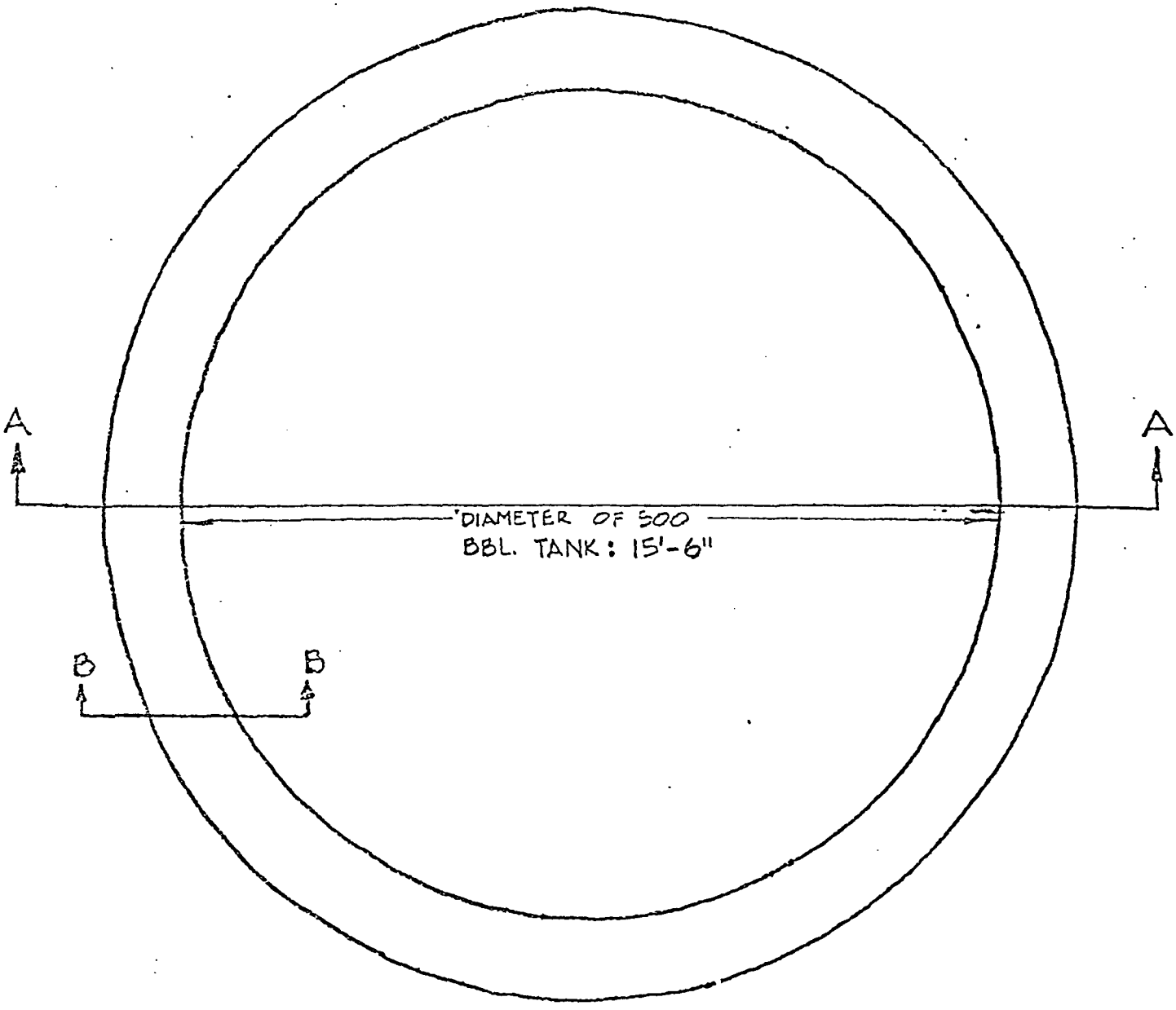


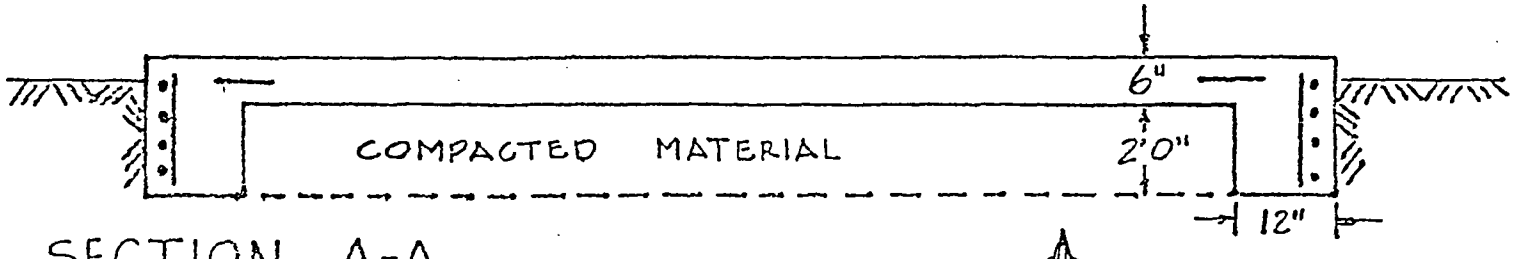
TRANSWESTERN PIPELINE COMPANY

500 BBL. TANK

STATION #9

DATE 5-3-82	SCALE NONE
DRAWN BY SCW	APPROVED





SECTION A-A

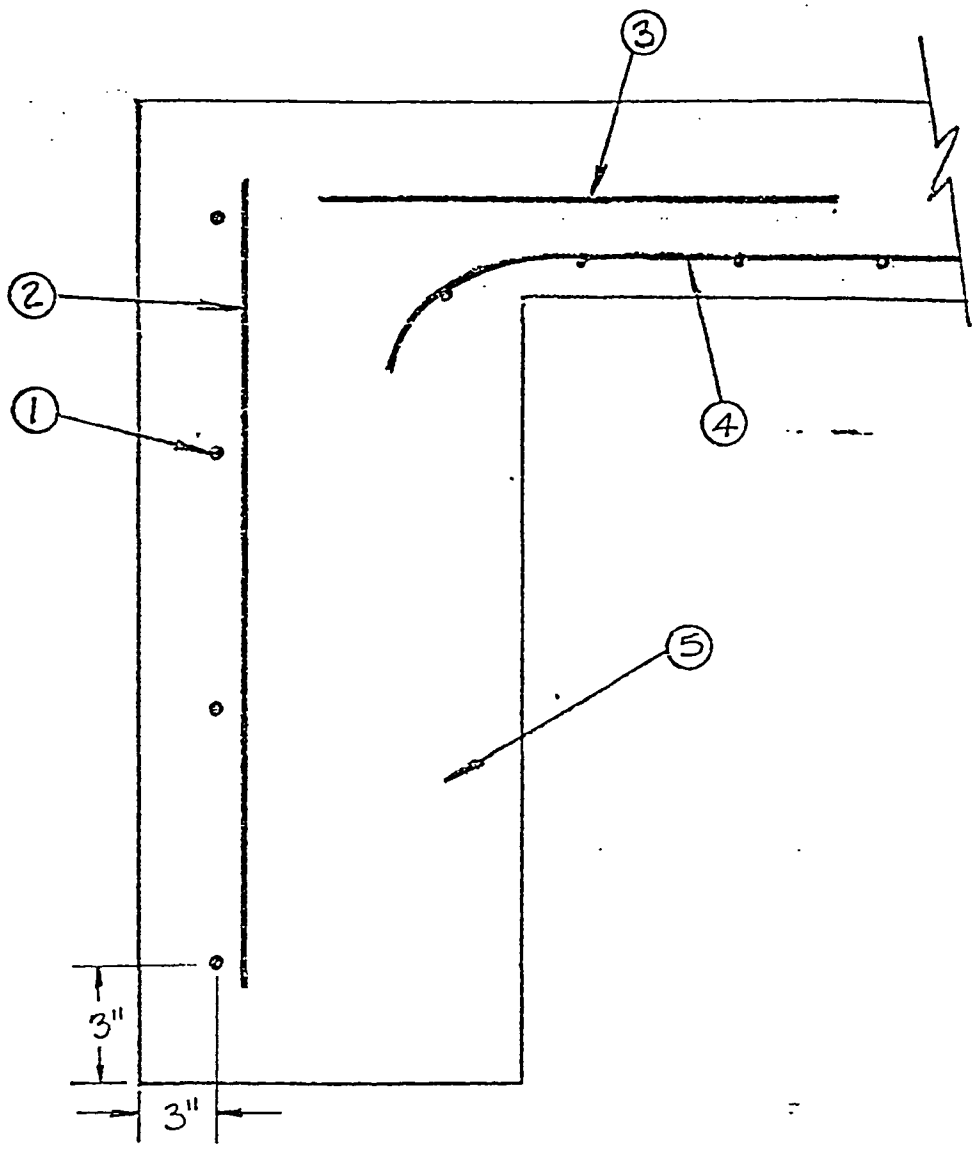
TRANSWESTERN PIPELINE COMPANY

STATION #9

TANK SLAB

DATE 3-15-82	SCALE NONE
DRAWN BY SCHI	APPROVED

SECTION B-B



MK	DESCRIPTION
①	4 #4 REBAR PLACED 8" ON CENTER, HORIZONTAL
②	#4 REBAR PLACED 12" ON CENTER, VERTICAL
③	#4 REBAR PLACED 24" ON CENTER, HORIZONTAL, 18" LONG
④	6 x 6 x 6/6 WELDED WIRE FABRIC
⑤	3000 PSI CONCRETE

TRANSWESTERN PIPELINE COMPANY

TANK SLAB

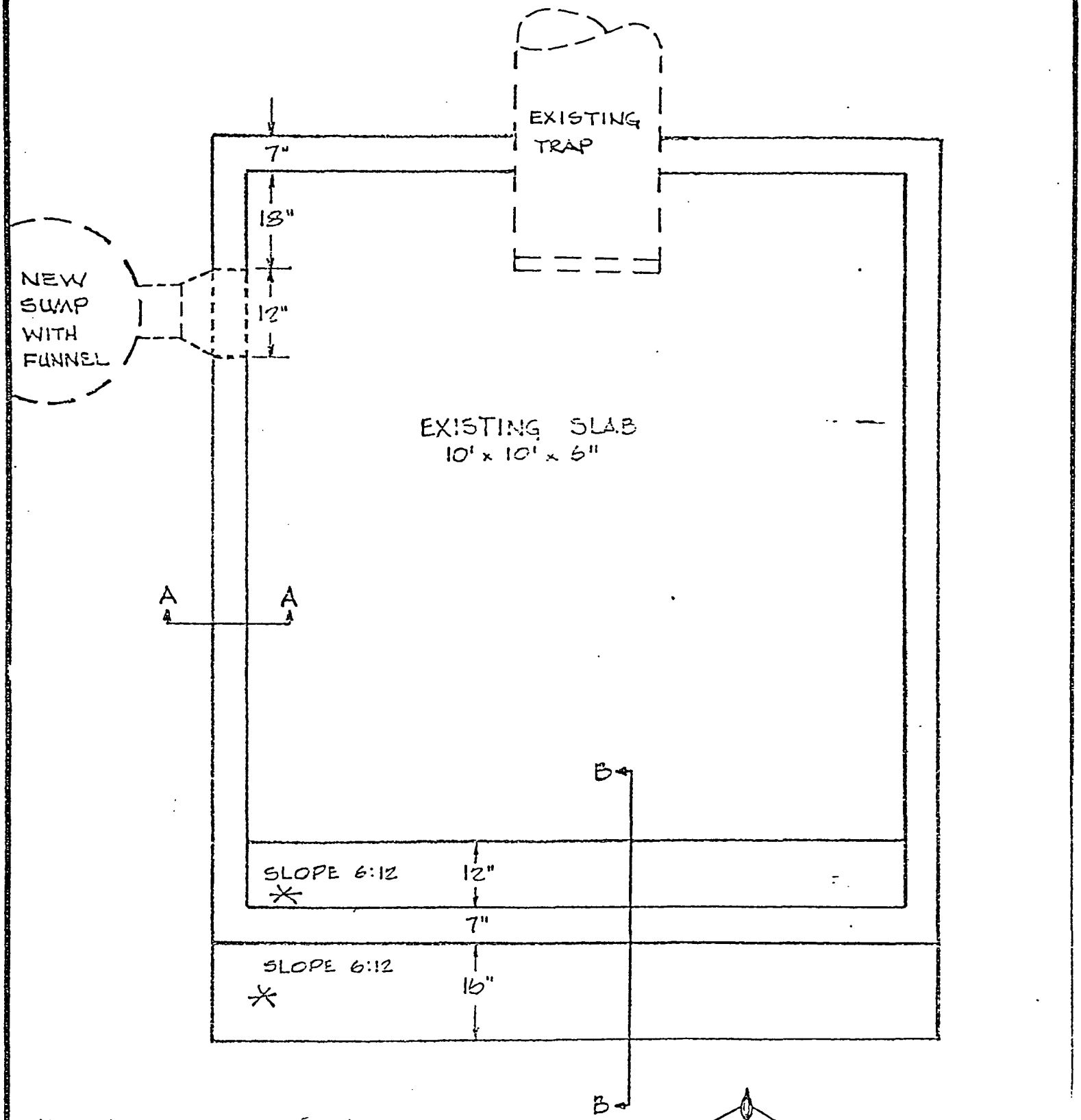
STATION #9

DATE 5-3-82	SCALE NONE
DRAWN BY SCW	APPROVED

BILL OF MATERIAL

Manufacturer to mark ALL EQUIPMENT as listed below, using both numbers, as example 46-1, 46-2, etc. SHEET B-E

No. Reqd.	Size	Description	Item No.	R
1	500 BBL.	Tank, 15'-6" diameter x 16' high, 1/4" thick steel plate bottom, 3/16" thick steel side walls & top, shell & deck complete with standard connections, accessories included are: outside ladder, 8" round thief hatch, 24" x 36" clean-out, 4" connections, 2" drain line, 1" rolline connection, 2 sections of 36" sight glass (beginning 4" from bottom)	1	
1	2"	Vent, ANSI 150#, Groth Model 7613	2	
1	2"	Flange, RF, ANSI 150#, threaded	3	
4	2" x 6"	Nipple, standard, threaded	4	
1	6"	Flame arrestor; ANSI 150#, Groth Model 7618	5	
1	6"	Flange, RF, ANSI 150#, threaded	6	
1	2" x 6"	Reducer, standard, concentric, threaded	7	
4	2"	ELL, 90° LR, standard, threaded	8	
1	2"	Valve, gate, ANSI 150#, threaded	9	
See Drawing	2"	Pipe, 2.375" O.D. x 0.154 W.T., SCH 40, threaded	10	



* RAMPED AREA FOR ENTRY/EXIT WITH TRACTOR

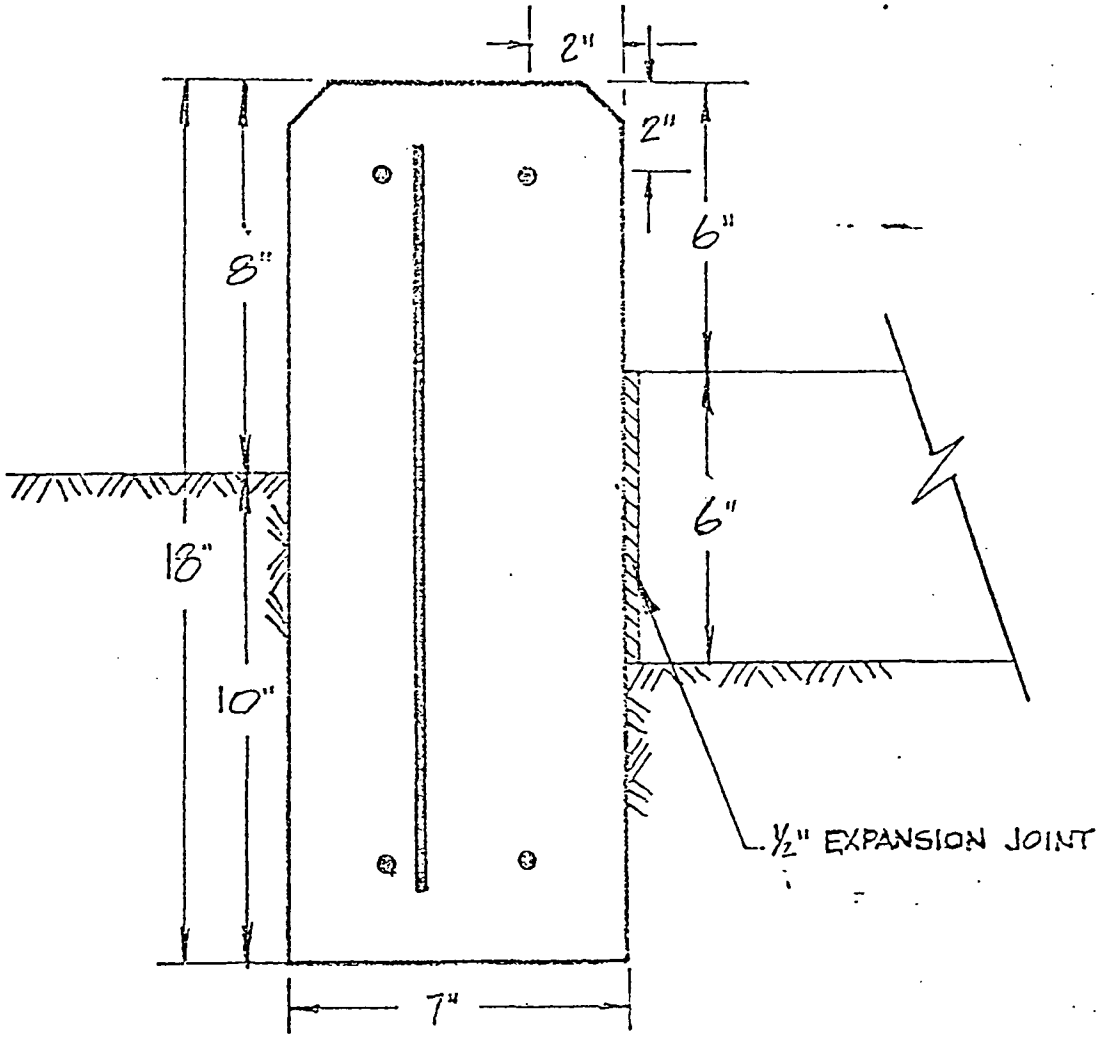
TRANSWESTERN PIPELINE COMPANY

STATION #9

CURBING AND RAMP

DATE 5-3-82	SCALE NONE
DRAWN BY SCW	APPROVED

SECTION A-A



4-#4 REBAR PLACED AS SHOWN, HORIZONTAL

#4 REBAR PLACED VERTICALLY 24" ON CENTER, ATTACHED TO ALTERNATING SIDES

3000 PSI CONCRETE

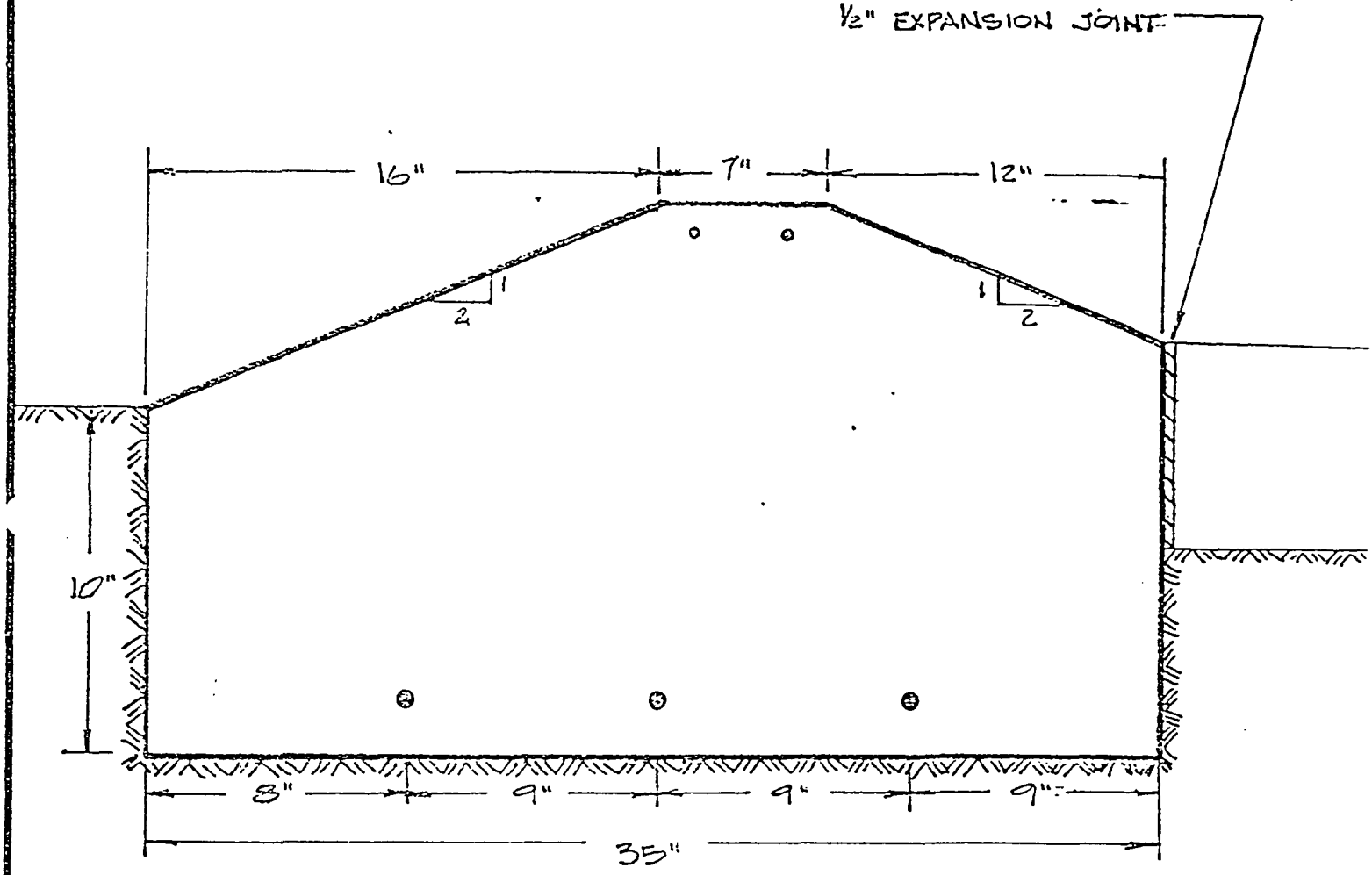
TRANSWESTERN PIPELINE COMPANY

STATION #9

CURBING AT PIG TRAP

DATE 5-3-82	SCALE NONE
DRAWN BY SCW	APPROVED

SECTION B-B



2 #4 REBAR PLACED IN TOP AS SHOWN

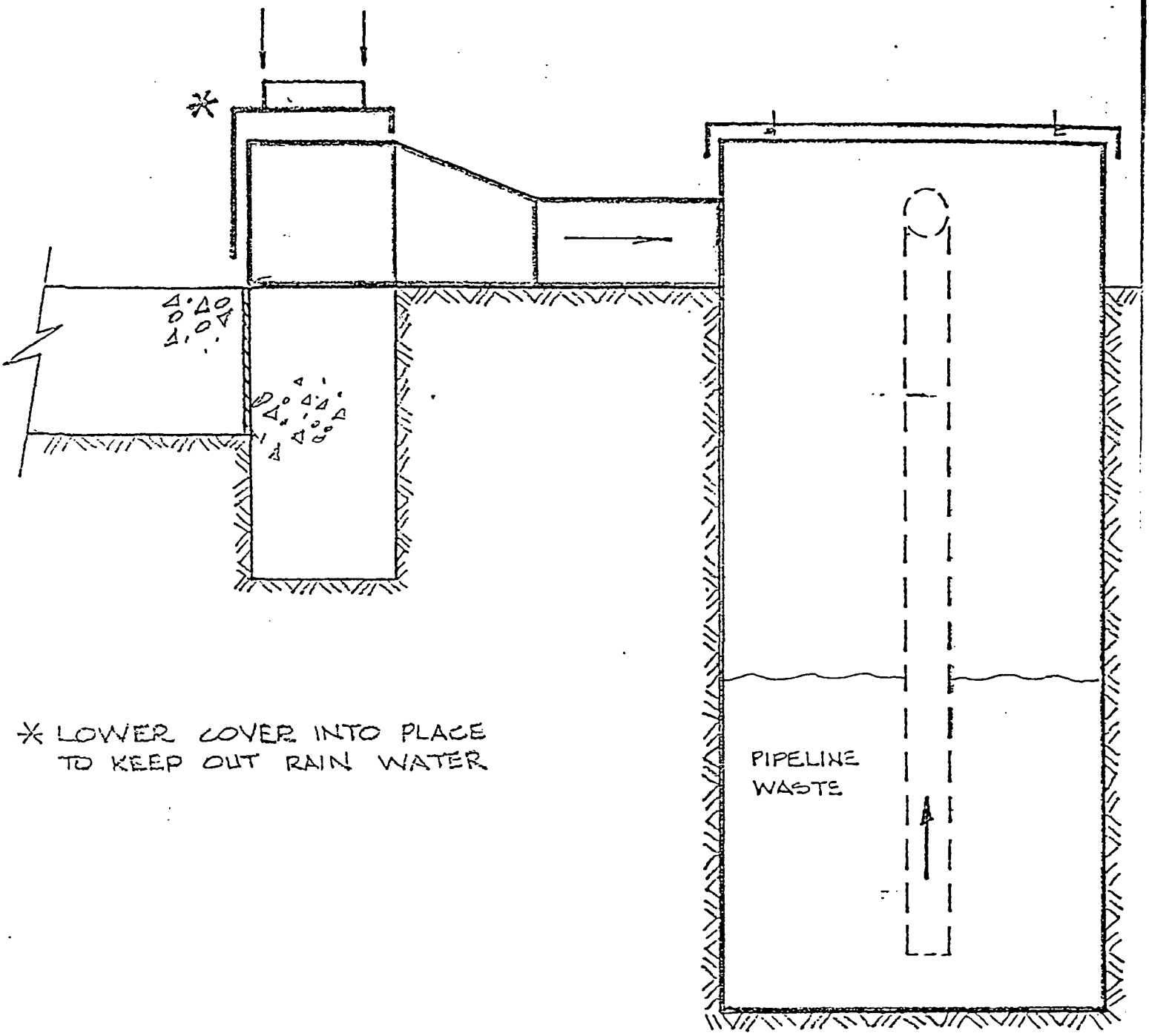
3 #6 REBAR PLACED IN BOTTOM AS SHOWN

3000 PSI CONCRETE

TW TRANSWESTERN PIPELINE COMPANY

TRACTOR RAMP AT PIG TRAP STATION #9

DATE 5-18-82	SCALE NONE
DRAWN BY ECW	APPROVED
CHECKED BY	BOOK NO.



* LOWER COVER INTO PLACE TO KEEP OUT RAIN WATER

TRANSWESTERN PIPELINE COMPANY

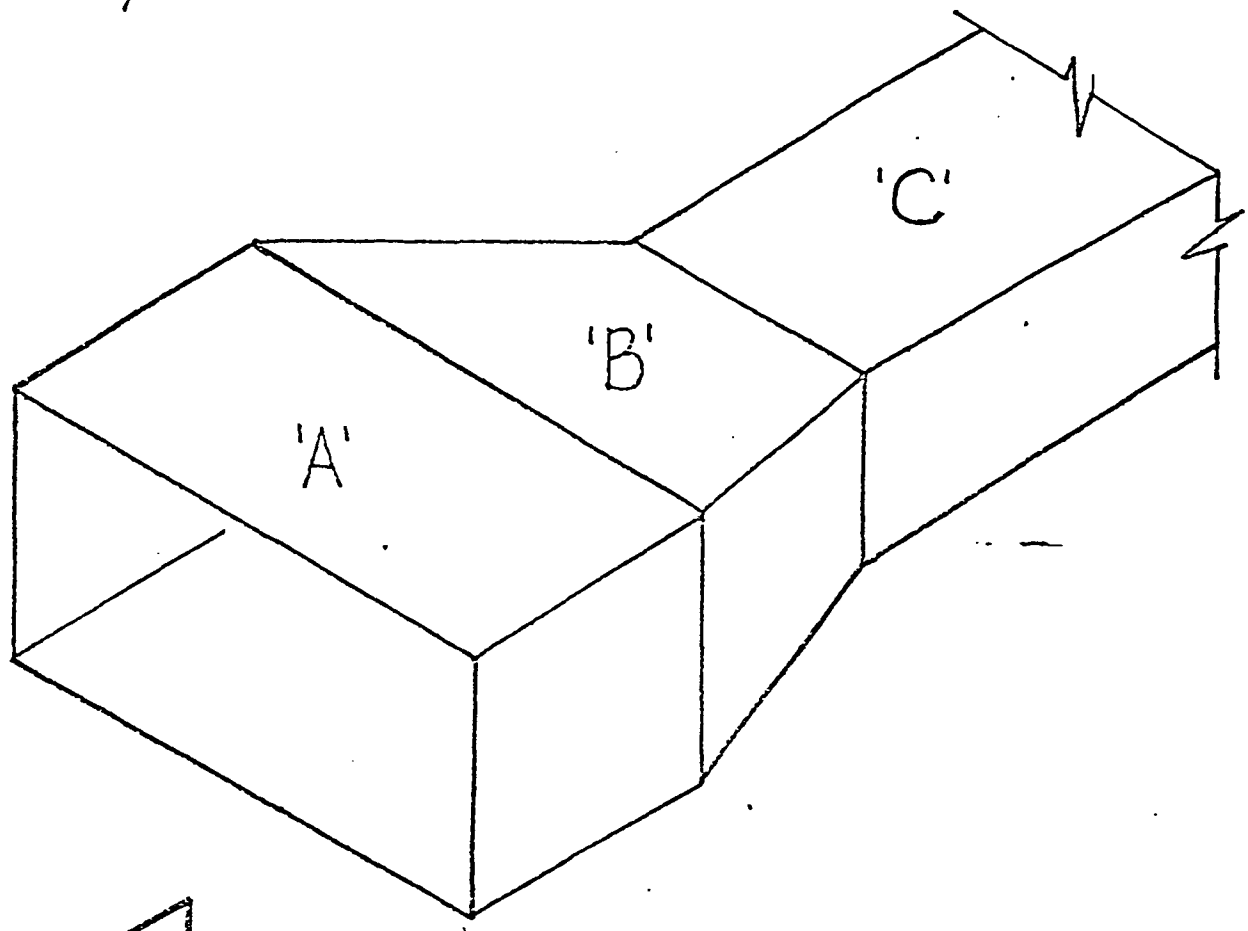
SUMP WITH FUNNEL IN PLACE

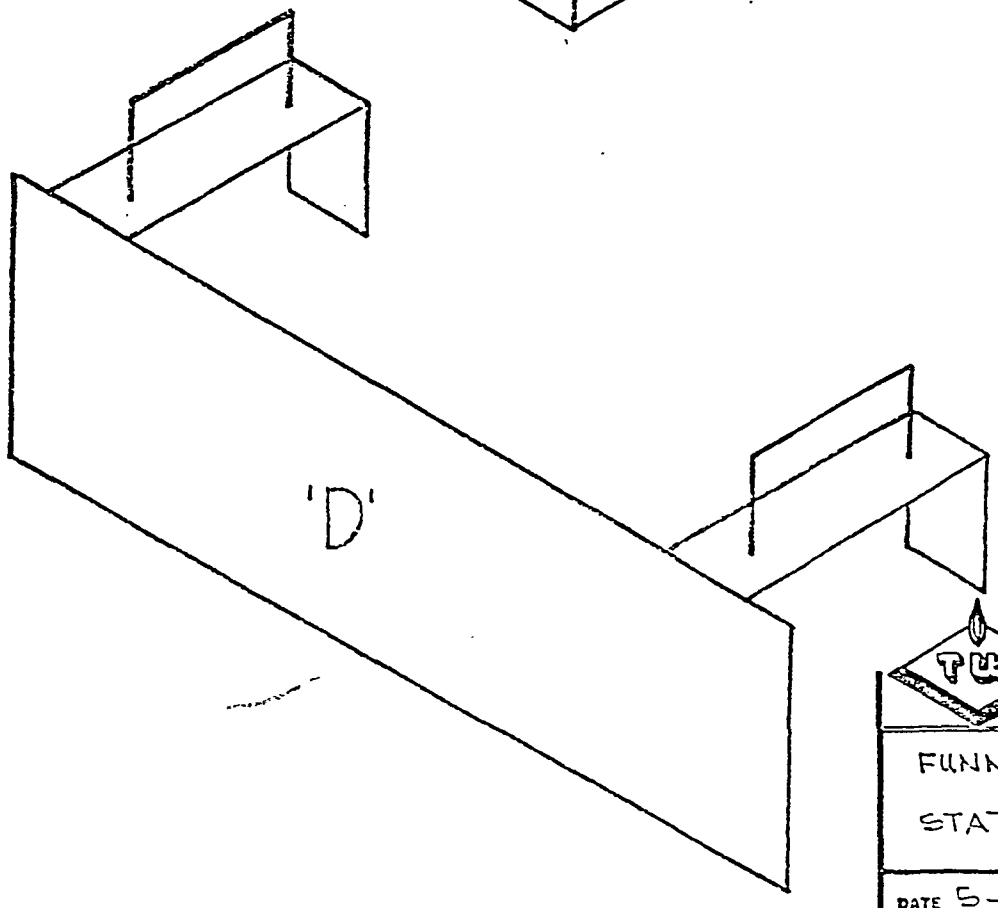
STATION #9

DATE 5-15-87	SCALE NONE
DRAWN BY SCW	APPROVED
CHECKED BY	BOOK NO.

SHOP FAB.

1/4" STL. PL. W/ WELDED JOINTS





TW TRANSWESTERN PIPELINE COMPANY

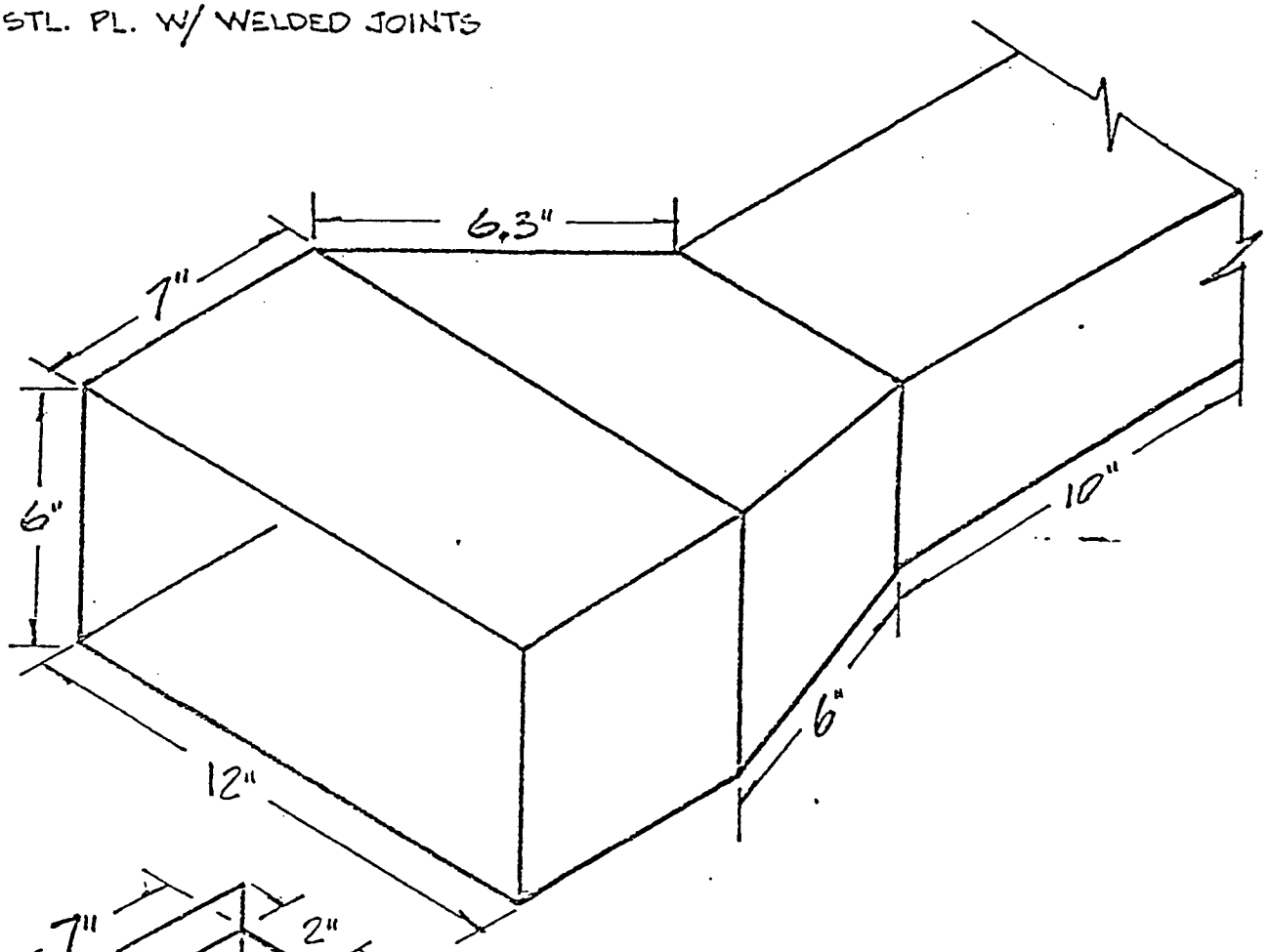
FUNNEL CHANNEL W/ COVER

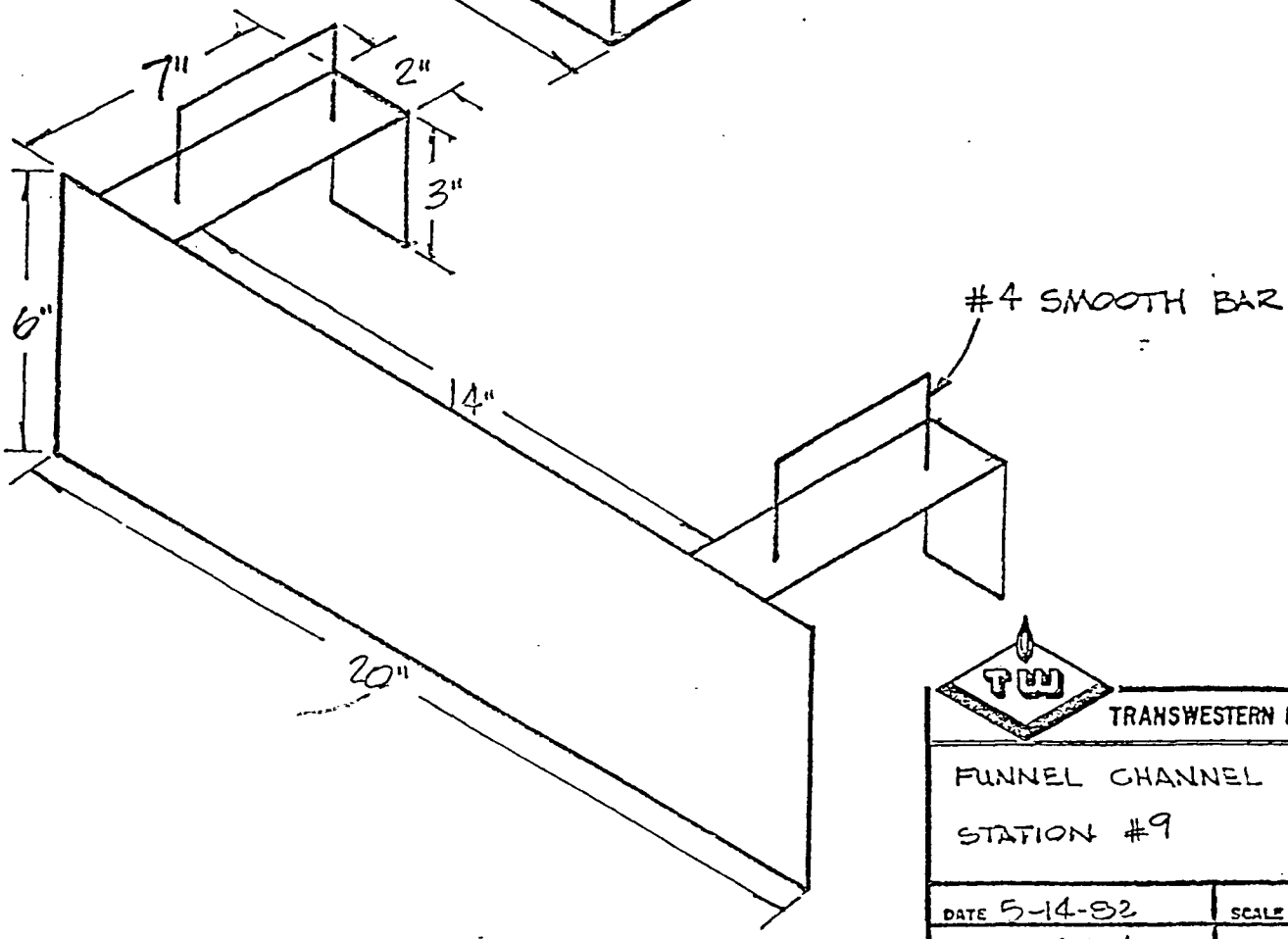
STATION #9

DATE 5-14-82	SCALE NONE
DRAWN BY SCW	APPROVED
CHECKED BY	BOOK NO.

SHOP FAB

1/4" STL. PL. W/ WELDED JOINTS



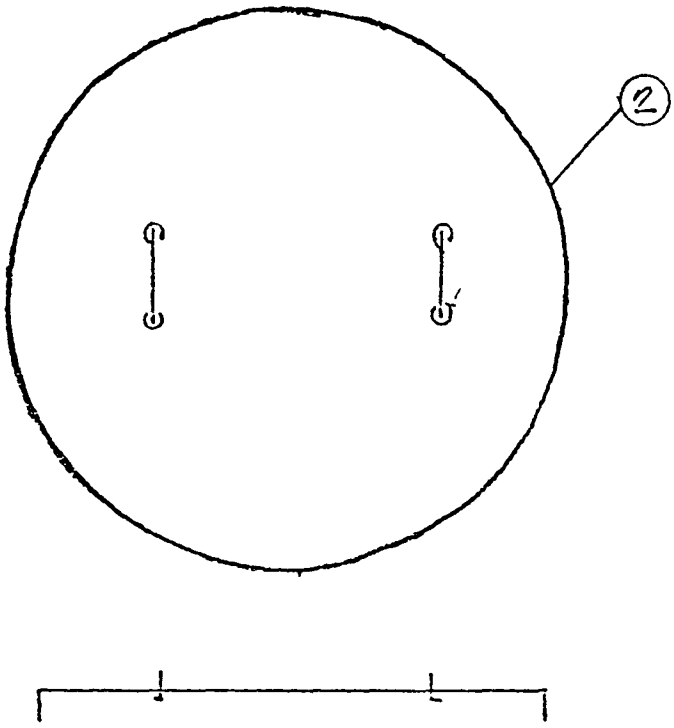


TRANSWESTERN PIPELINE COMPANY

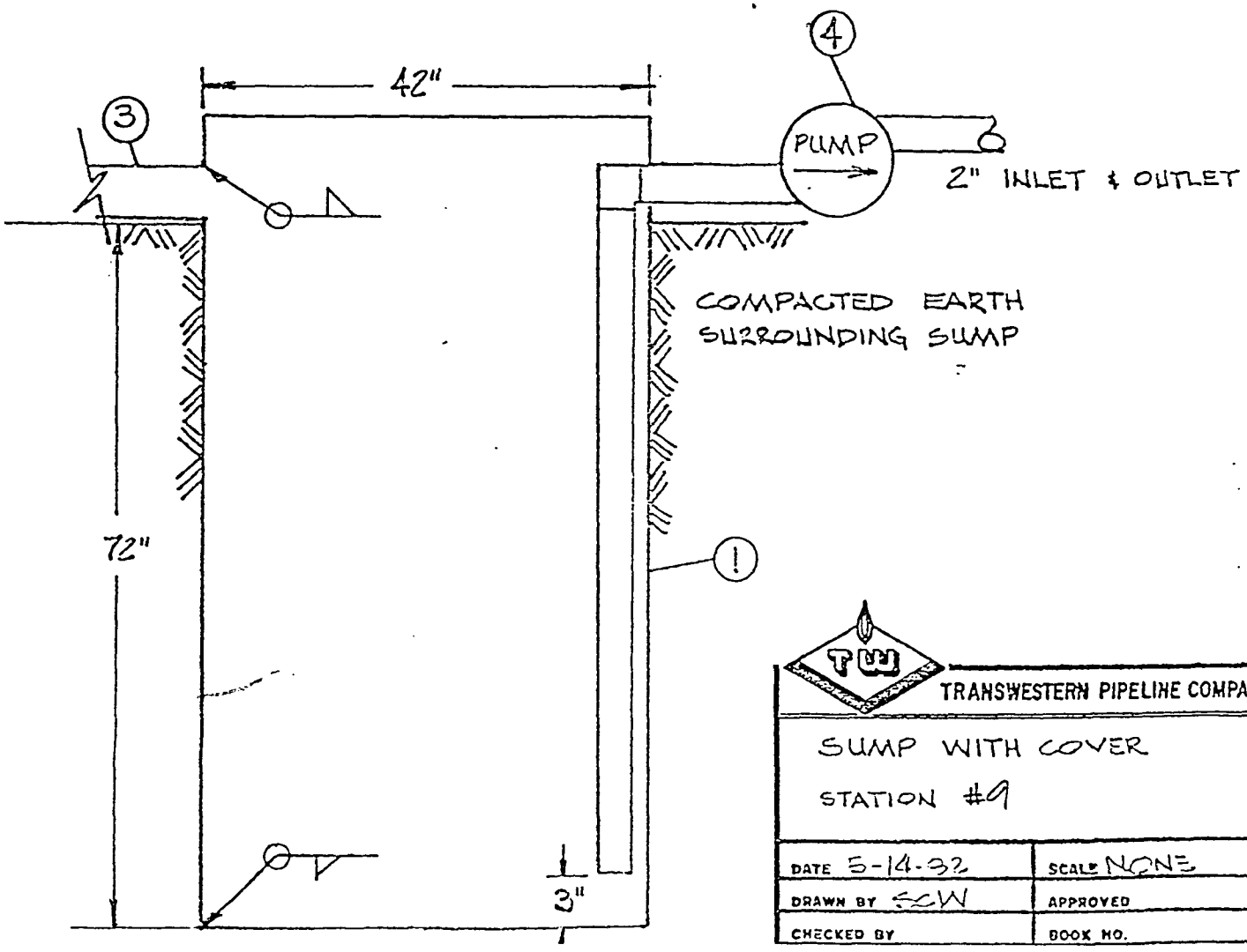
FUNNEL CHANNEL W/ COVER

STATION #9

DATE 5-14-82	SCALE NONE
DRAWN BY SCW	APPROVED



SHOP FAB.



TRANSWESTERN PIPELINE COMPAN

SUMP WITH COVER

STATION #9

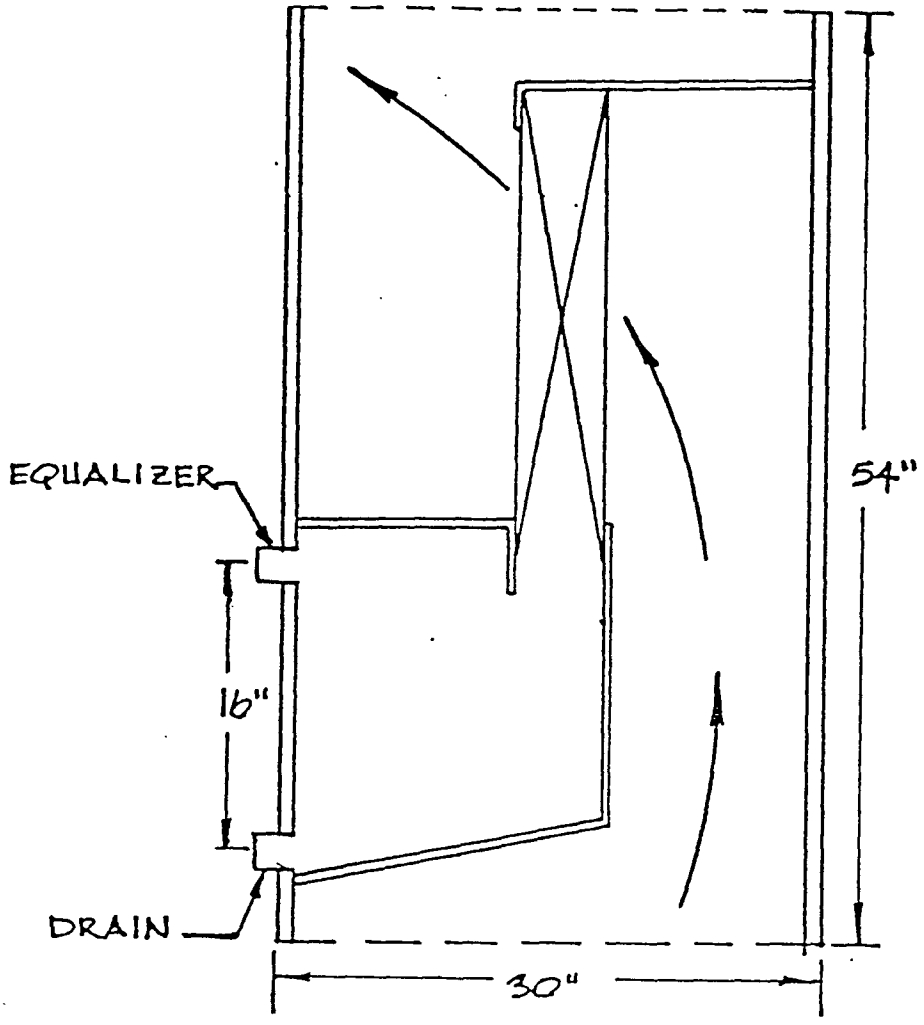
DATE 5-14-32	SCALE NONE
DRAWN BY SCW	APPROVED
CHECKED BY	BOOK NO.

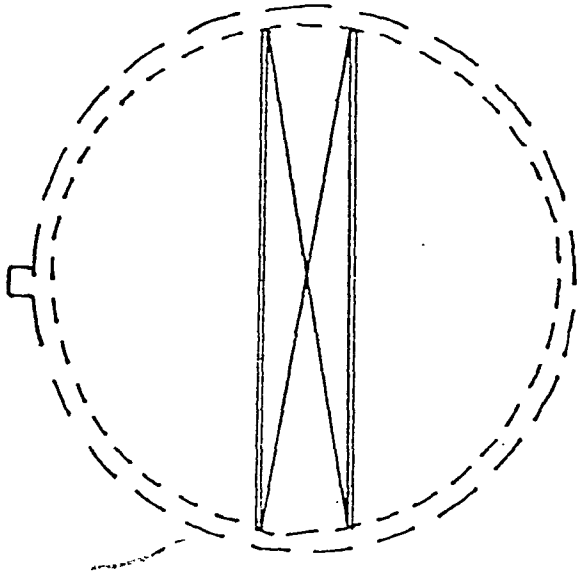
*SHOP FABRICATED FOR FIELD FIT

BILL OF MATERIAL

Manufacturer to mark ALL EQUIPMENT as listed below, using both numbers, as example 46-1, 46-2, etc. SHEET C-8

No. Reqd.	Size	Description	Item No.	Rem
1	10 BBL	Sump, used steel pipe, 42" O.D. x 0.500 W.T., 84" high with 72" below grade, 1/4" steel plate bottom, inlet opening: welded to part 'C' on funnel channel (4" H x 6"W x 10"L welded together), outlet opening: to fit 2.375" pipe	1	Shop Fab.
1	43" Dia.	Cover, 1/4" steel plate, 1" welded edge, #4 smooth bar handles	2	Shop Fab.
1 *	See Drawing	Funnel channel with cover, 1/4" steel plate, welded joints.	3	Shop Fab.
		Part A: Top & bottom 7" x 12"		
		Sides 6" x 7"		
		Part B: Moving Clockwise		
		Slanted top 12" x 6.3" x 6" x 6.3"		
		Flat bottom 12" x 6" x 6" x 6"		
		Sides 6" x 6.3" x 4" x 6"		
		Part C: Top & bottom 6" x 10"		
		Sides 4" x 10"		
		Part D: Front 6" x 20"		
		Straps 2" x 7" & 2" x 3"		
		Handles Bent #4 Smooth Bar		
1	2"	Pump, Double-Diaphragm	4	





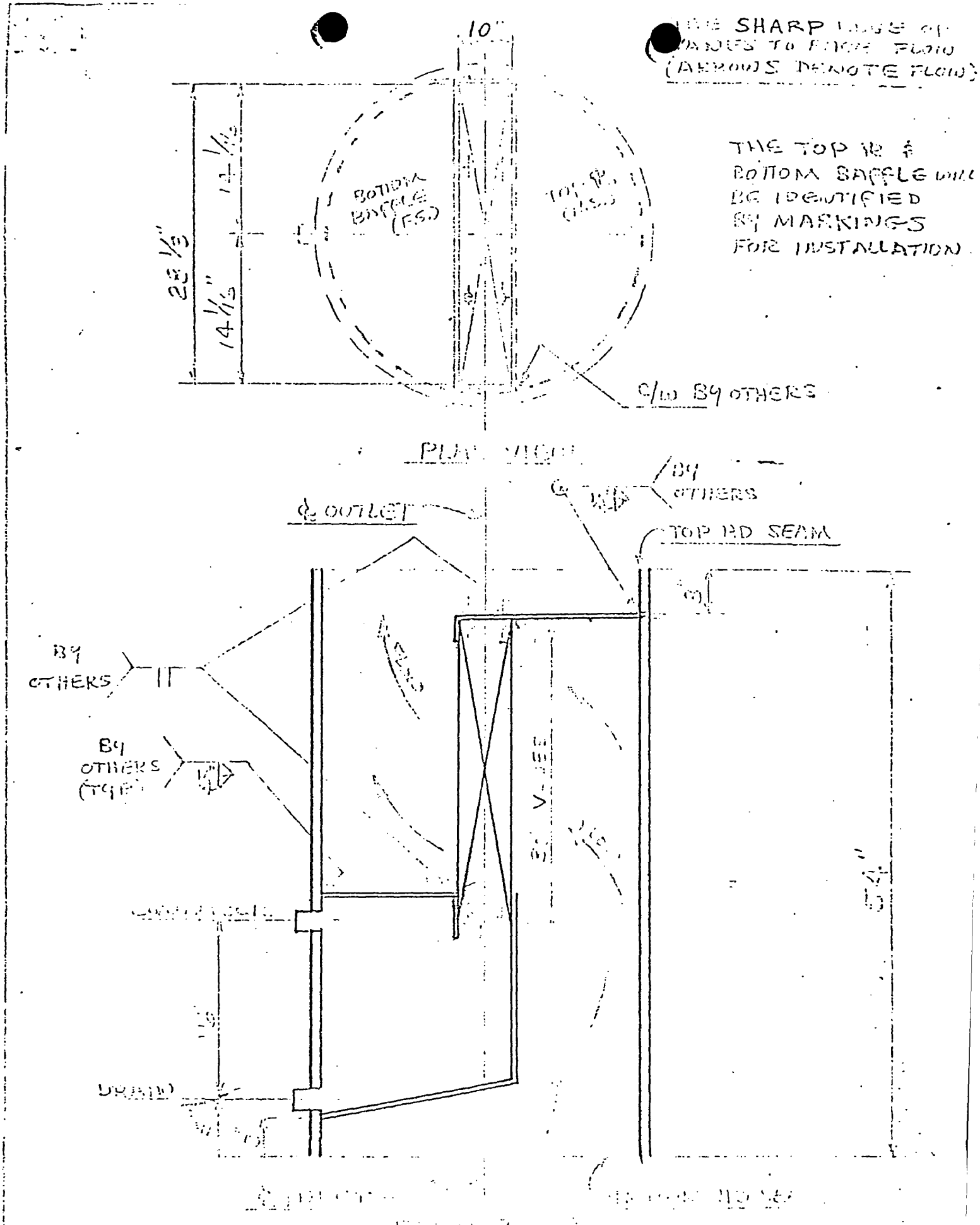
PER BEAL EQUIP. CO.

TRANSWESTERN PIPELINE COMPANY

STATION 9

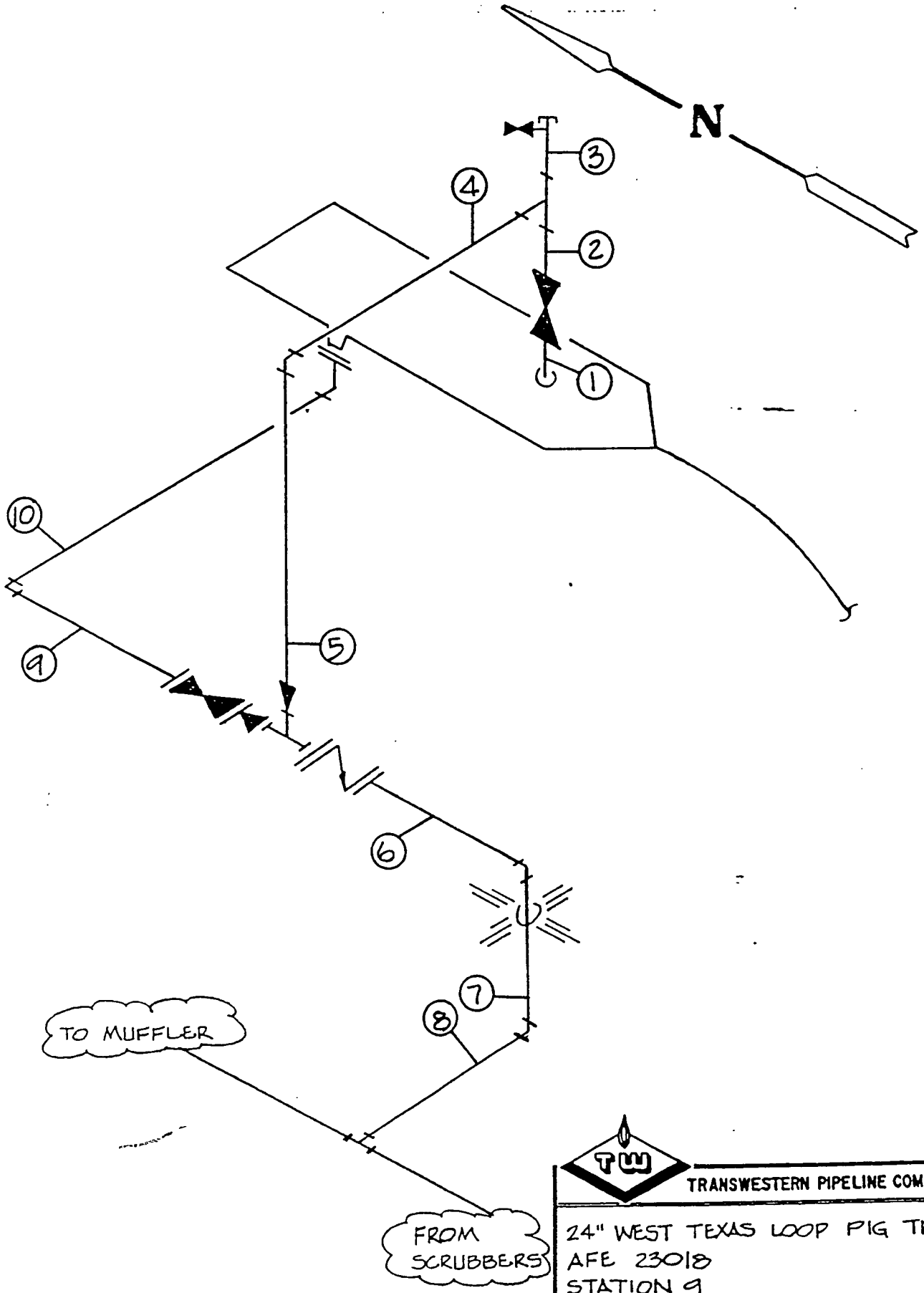
MIST EXTRACTOR

DATE 3-10-82	SCALE NONE
DRAWN BY SCH	APPROVED
CHECKED BY	BOOK NO.



VAULT UNIT FOR 29 1/4" I.D. CHAMBER

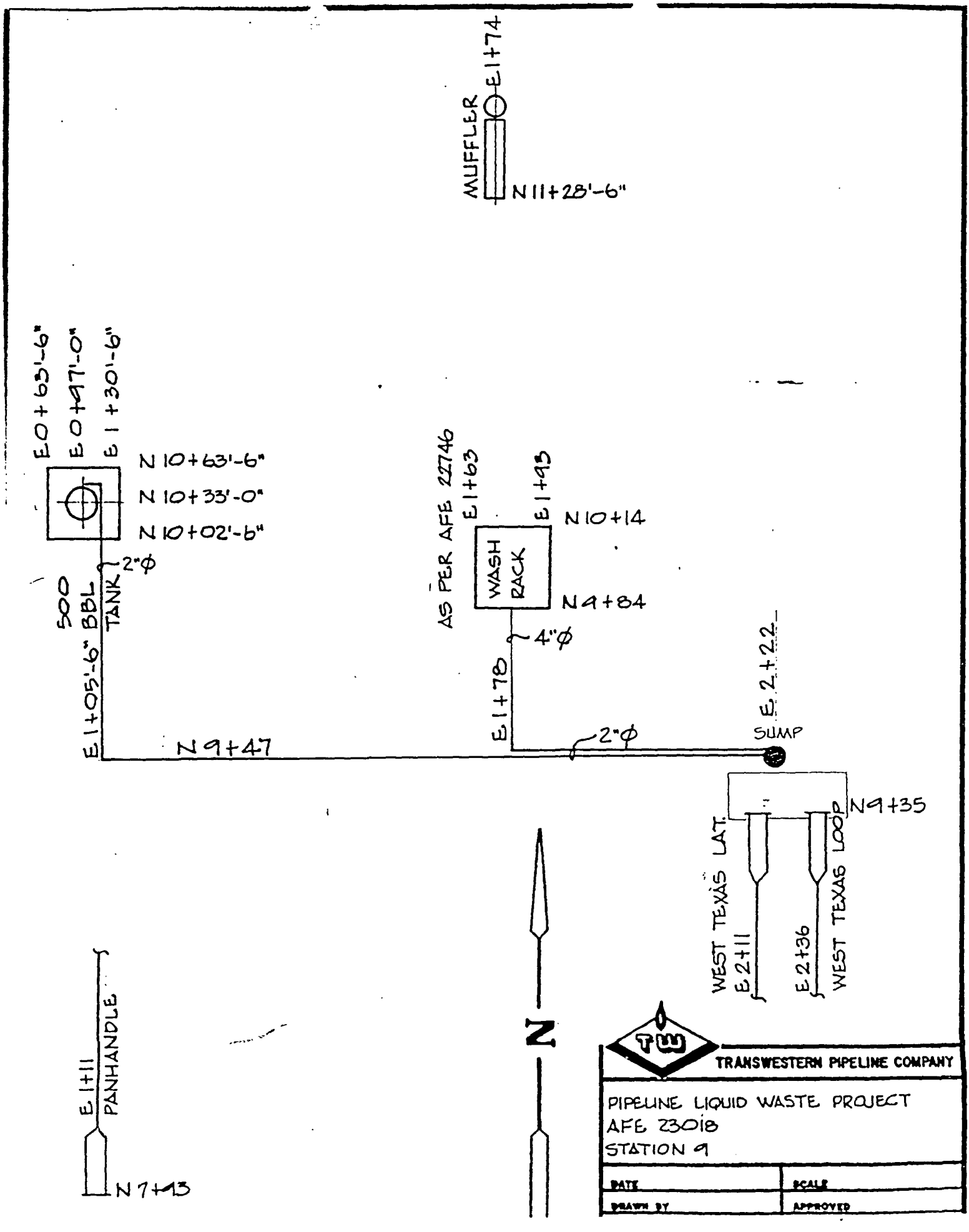
SHEET D-2



TRANSWESTERN PIPELINE COMPANY

24" WEST TEXAS LOOP PIG TRAP
AFE 23018
STATION 9

DATE	SCALE


MUFFLER
E1+74
N11+28'-6"
E0+63'-6"
E0+97'-0"
E1+30'-6"
N10+63'-6"
N10+33'-0"
N10+02'-6"
2"ϕ
500 BBL TANK
E1+05'-6"
N9+47
AS PER AFE 22746
E1+63
E1+93
WASH RACK
N10+14
N9+84
4"ϕ
E1+78
2"ϕ
E2+22
SUMP
N9+35
WEST TEXAS LAT.
E2+11
E2+36
WEST TEXAS LOOP
E1+11
PANHANDLE
N7+13
N
TW
TRANSWESTERN PIPELINE COMPANY
PIPELINE LIQUID WASTE PROJECT
AFE 23018
STATION 9
DATE
SCALE
DRAWN BY
APPROVED

Form 307 PL (Rev. 12-75)

TEXAS EASTERN TRANSMISSION CORPORATION

OPERATING DEPARTMENT

MAINTENANCE JOB COMPLETION REPORT

Eastern ☐
Western ☒

Field Office District III Roswell, N.M. Date of Report 11-18-83 Maintenance Job No. 3-83-24

Title: Re-route Auxiliary Building & Main Engine Room Building Roof Drains & Install New Roof Coating on Auxiliary & Main Engine Room Building Roofs

Location: Compressor Station No. 9 - Roswell, New Mexico

Date Started 10-25-83 Date Completed 11-9-83

Performed by: Jack Whisler, Inc.

Remarks:

Inventory by: Frank Smith Date 11-18-83

Drawing Nos.: To be sent later

NOTE: Attach drawings with bill of material showing removals, installations, relocations and other alterations as approved under this job number.

Signed: Francis M. Cox
Supervisor

Signed: L. G. Langston
Manager

Distribution: Orig. Alan Bond
A.B. Jarnagin
Larry Langston
John Kotarski
Lowell Davina
Francis Cox

ORIGINAL MAILED
DEC - 6 1983
TO HOUSTON OFFICE

Form 306 PL (Rev. 12-75)

TEXAS EASTERN TRANSMISSION CORPORATION

OPERATING DEPARTMENT

MAINTENANCE JOB

Eastern ☐
Western ☒

Field Office District III - Roswell, New Mexico Maintenance Job No. 3-83-24

Title: Re-route Auxiliary Building & Main Engine Room Building Roof Drains & Install New Roof Coating on Auxiliary & Main Engine Room Building Roofs

Location: Compressor Station No. 9 - Roswell, New Mexico

Description of Work (Including "Purpose and Necessity"): Re-route existing roof drains from the sump tanks in the auxiliary building & the main engine room building and downspout to the ground to prevent rain water from being pumped into the 500 bbl. waste storage tank. New downspouts to be 4" dia., Sch. 80, PVC pipe on the auxiliary building & 6" dia., Sch. 80, PVC pipe on the engine room building. Install concrete curb to prevent water from spilling against existing equipment & piping. Apply new roof coating to the auxiliary building roof & the main engine room building roof to repair existing leaks.

Estimated Starting Date Oct. 15, 1983 Estimated Completion Date Nov. 15, 1983

Estimated Costs: Material $ _____ Co. Installation $ _____

Contract Services and Rental Equipment $ 9,700.00 Total $ 9,700.00

Budgeted: Yes ☐ No ☒ Budget Estimate $ -0-

Drawing Number N/A

Requested by: Francis M. Cox Date 10-10-83

Approved: L. A. Langston Manager Date 10-17-83

Approved: _____ Date _____

Authorized: _____ Date _____

Remarks: Request a "DMJ" Number for the above mentioned work.

In 1983 Budget: No

Distribution: Orig. / Larry Langston ✓
A B Jarnagin
Francis Cox
Lowell Davina

NOTE: A sketch shall be submitted with this request whenever a change of design or specifications is involved.

1204
Rev. 3-81

TEXAS EASTERN TRANSMISSION CORPORATION AND SUBSIDIARIES

COMPLETION REPORT

E. E. No. T-81-109
Prelim. Ref. No. 567-544
Docket/Proj. No. NONE
Code No.

Transwestern Pipeline Company
Company Name

Gas Western 10/14/80-05
Profit or Cost Center

AFE No. 22419
Company No. 09

[X] Property Addition	[ ] Preliminary Investigation	[ ] Research & Development	[ ] Other Work	[ ] Property Retirement	[ ] Other (Specify)

TITLE Install Waste Oil Storage Tank — Roswell Manager

LOCATION Compressor Station No. 9 - Roswell, N.M. G.P.L.Loc 30-1-7991 District III

Date Started 9-26-81 Date in Service 6-18-82 Date Completed 6-18-82

Related AFE No. None

Drawings Attached NOTE: TO BE SENT AT A LATER DATE LE

Other Ref. Swg's (Not Attached) N/A

MATERIAL OR RECEIVING REPORTS ISSUED

See TW-112

REMARKS:

ORIGINAL MAILED
JUL 26 1982
TO HOUSTON OFFICE

ENGINEERING SERVICES		OPERATIONS	
Prepared by:	Date:	Prepared by: Frank Smith Frank Smith	Date: 6-25-82
Verified by:	Date:	Verified by: Francis H. Cox	Date: 6-25-82
Manager Plant Records	Date:	Approved by:	Date: 7-23-82
Manager Materials Management:	Date:	Approved by:	Date:
General Plant Administrator	Date:	Approved by:	Date:

TEXAS EASTERN
AND SUBSIDIARIES
INVOICE IN TRIPLICATE TO:

TRANSWESTERN PIPELINE CO.
ACCOUNTING DEPARTMENT
P.O. BOX 2521
HOUSTON, TEXAS 77001

SHIP TO: 09-30-90
TRANSWESTERN PIPELINE COMPANY
P.O. BOX 2018
HWY 285 NORTH
ROSWELL, NEW MEXICO 88201
CARE OF: FRANCIS COX

VENDOR: 243900
GOOCH TANK & MANUFACTURING CO.
P.O. BOX 133
TATUM, NM 88267

PURCHASE ORDER

NO. 09-007517))

THIS PURCHASE ORDER NUMBER MUST BE SHOWN ON INVOICE, TAG, BOX, BILL OF LADING OR EXPRESS RECEIPT

DATE OF ORDER	DATE REQUIRED
04-16-81	05-15-81

STATE SALES/USE TAX INSTRUCTIONS
[X] TAXABLE-STATE OF NM
[ ] TAX EXEMPT-SEE NOTE BELOW
[ ] SERVICES-NONTAXABLE

SHIP PREPAID AND [ ] ADD [X] ALLOW VIA: VENDOR

F.O.B. DESTINATION

TERMS: NET 30

A.F.E. NO. | PROJECT DESCRIPTION | PROJECT NO. | JOB NO. | M&S ACCT.

PO ITEM	SM ITEM	CATALOG NO.	QUAN. REC'D	QUANTITY	UNIT	DESCRIPTION	UNIT PRICE	SCHEDULED SHIPPING DATE	PR
01			2	3	EA	TANK, - 10 FT. DIA. X 15 FT. HIGH, 1/4" STEEL PLATE BOTTOM, 3/16" STEEL SIDE WALLS AND TOP DECK COMPLETE WITH STANDARD CONNECTIONS. ONE (1) TANK EACH TO BE DELIVERED TO STATION NO. 8, STATION NO. 9 AND STATION NO. UT-1 CHARGE AS FOLLOWS: 1 EA - 567.9 107-8 224-1-5 49 12-9 5-41 1 EA - 567.9 107-8 224-1-2 49 12-9 5-41 1 EA - 567.9 107-8 224-1-9 49 Z12-9 5-41	2614.00	05-07-81	1

REQUISITION NO: 9-81-22415-1
REQUESTED BY: FRANCIS M. COX
BUYER: JB
TYPIST: NA

INTENDED USE OF MATERIAL: STORAGE OF WASTE OIL FOR RECLAIMING AT STA NO. 8, 9 AND UT-1

TRANSPORTATION RECEIPT
VIA: VENDORS DELIVERY
NO. DATE 6-2-81

COPY TO BE SENT TO FIELD OFFICE FILE	ACCOUNT NUMBER: ORGN UNIT	DIV	GENERAL	MAJOR	MINOR	COST ELEM	DEBIT	CREDIT

IF NO EXCEPTIONS ISO INDICATE: NONE

AMOUNT PREPAID [ ] COLLECT [ ] IF COLLECT, HOW PAID

RECEIVED BY: J.R. RUSSELL DATE 6-2-81

APPROVALS DATE

Form No. 1135

Texas Eastern Transmission Corporation and Subsidiaries

AUTHORIZATION FOR EXPENDITURES

E. E. No. T-81-109 — Transwestern Pipeline Company — AFE No. 22419

Prelim. Ref. No. 567-544 — Company Name

Docket/Proj. No. NONE — Company No. 09

Code No. ____ — Gas Western 10/14/80-05

Profit or Cost Center and Appropriation Reference No.

☒ Property Addition	☐ Preliminary Investigation	☐ Research & Development	☐ Other Work	☐ Advances For Gas	☐ Property Retirement	☐ Other (Specify)

TITLE: Install Waste Oil Storage Tank — Roswell Operations

LOCATION: G. P. L. Loc. 30-1-7119
Compressor Station No. 9 - Roswell, New Mexico — District III

DESCRIPTION

Purchase and install 210 bbl. waste oil storage tank to include piping, pump and fittings for used oil for reclaiming purposes at Station No. 9 and field locations in District III.

FERC 1-12 ANALYSIS 04

Related A. F. E. Number — NONE

Budget "Job Report" Item No. 238 — OPERATIONS A. F. E.

PURPOSE & NECESSITY

Storage of waste oil for reclaiming purposes at Station 9 and field locations in District III.

TW-112, 1203 & 1204 to be completed by: Frank Smith

Work to Begin: 4/81 — ☐ Company Personnel

Work to be Completed: 5/81 — Work to be Done by: ☒ Contractor

		A.S. NO. 49 *For Comptroller Division Use Only*	
Material Costs	$ 12,500	Status of Appropriation:	
Installation Costs	$ 7,500	Total Appropriation	$ 5,882,000
Sub Total	$ 20,000	Deduct: Previous AFE's	$ 1,357,630
Deduct: Interest	$	This AFE	$ 20,000
AUTHORIZED AMOUNT	$ 20,000	Remaining Appropriation	$ 4,504,370

Prepared by: L. L. Thurman	Date: 12/15/80		Date:
Verified by: D. H. Compton	Date: 1-8-81	Tax Dept. Review by: R. D. Jones	Date: 3-23-81
Engineering Approval: Richard Thurman	Date: 2/24/81	Accounting Dept. Review by: David Omak H&R	Date: 3-24-81
Group or Division Authorization: L. L. Colvin	Date: 3/19/81	Comptroller Division Approval: Nancy J. Nobles	Date: 3/25/81

Form No. 1135

Texas Eastern Transmission Corporation and Subsidiaries

AUTHORIZATION FOR EXPENDITURES

E. E. No. _____
Prelim. Ref. No. 567-544
Docket/Proj. No. _____
Code No. _____

Transwestern Pipeline Company
Company Name

Gas Western 10/14/80-05
Profit or Cost Center and Appropriation Reference No.

AFE No. 22419

Company No. 09

☒ Property Addition	☐ Preliminary Investigation	☐ Research & Development	☐ Other Work	☐ Advances For Gas	☐ Property Retirement	☐ Other (Specify)

TITLE
Install Waste Oil Storage Tank — Roswell Operations

LOCATION
Compressor Station No. 9 - Roswell, New Mexico — District III

DESCRIPTION

Purchase and install 210 bbl. waste oil storage tank to include piping, pump and fittings for used oil for reclaiming purposes at Station No. 9 and field locations in District III..

Related A. F. E. Number — NONE

Budget "Job Report" Item No. 238 — OPERATIONS A. F. E.

PURPOSE & NECESSITY

Storage of waste oil for reclaiming purposes at Station 9 and field locations in District III.

TW-112, 1203 & 1204 to be completed by: Frank Smith

Work to begin: 4/81
Work to be completed: 5/81

☐ Company Personnel
Work to be Done by:
☒ Contractor

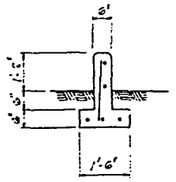
Material Costs	$ 15,000
Installation Costs	$ 5,000
Sub Total	$ 20,000
Deduct: Interest	$
AUTHORIZED AMOUNT	$ 20,000

For Comptroller Division Use Only

Status of Appropriation:
Total Appropriation $
Deduct: Previous AFE's $
This AFE $
Remaining Appropriation $

Prepared by: L. L. Gruson	Date: 12/15/80		Date:
Verified by: D. F. Scrogin	Date: 1-8-81	Tax Dept. Review by:	Date:
Engineering Approval:	Date:	Accounting Dept. Review by:	Date:
Group or Division Authorization:	Date:	Comptroller Division Approval:	Date:

ORIGINAL MAILED
JAN - 9 1980
TO HOUSTON OFFICE



SECTION 'A-A'
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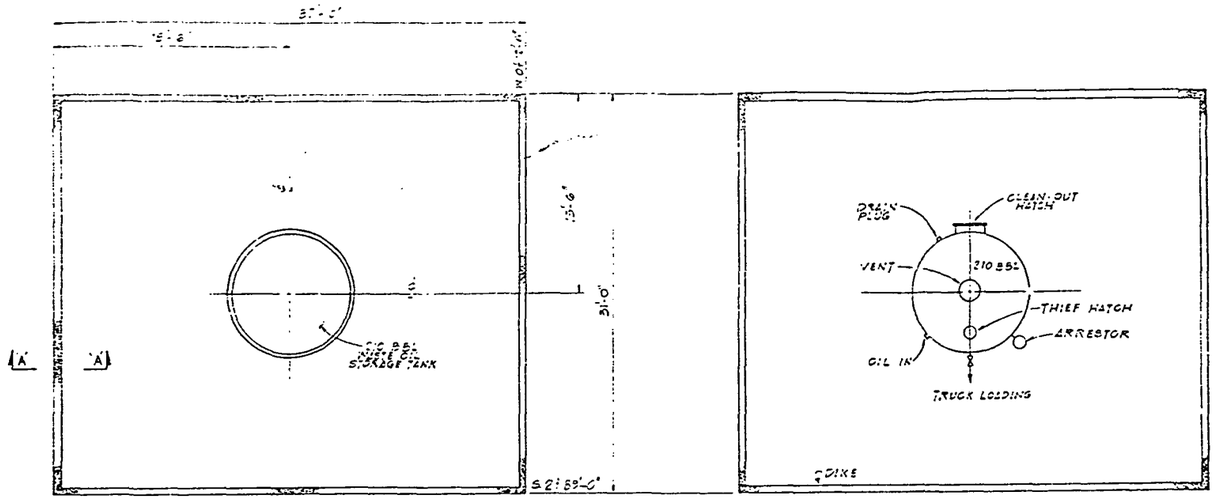

DIKE DETAILS
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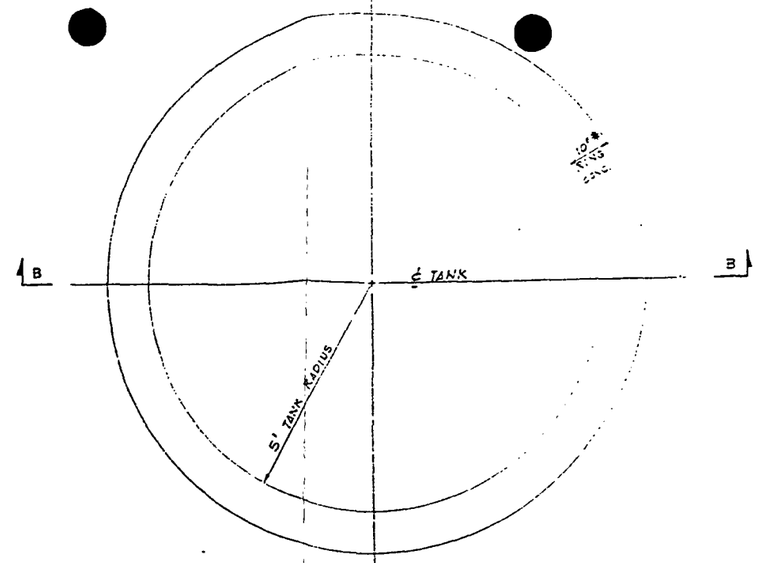
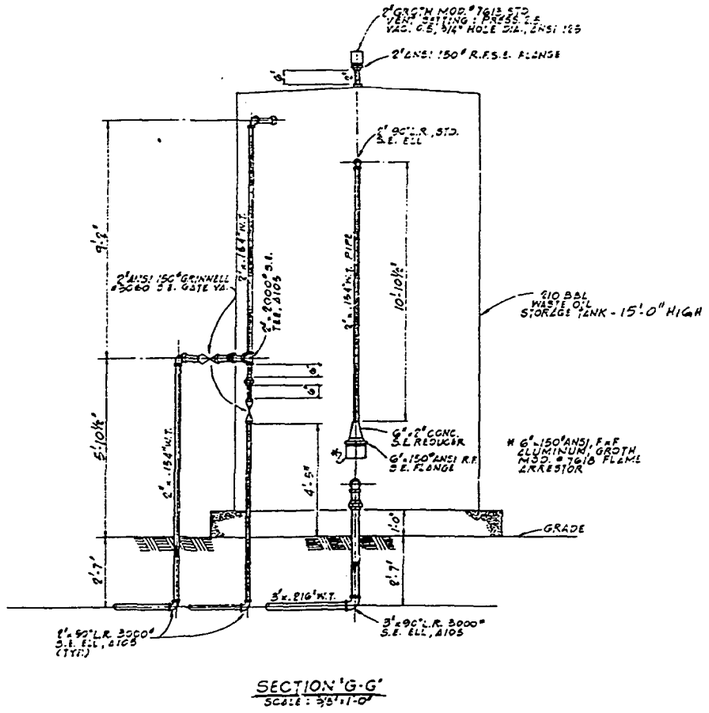
TANK DETAILS
SCALE: 3/16"=1'-0"



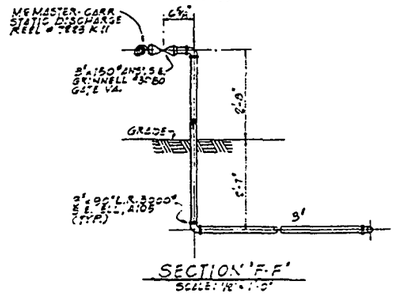
PLAN

* CONCRETE RING WALL SEE SPECIFICATIONS FOR 5' RADIUS OR MORE 3000 PSI CONCRETE

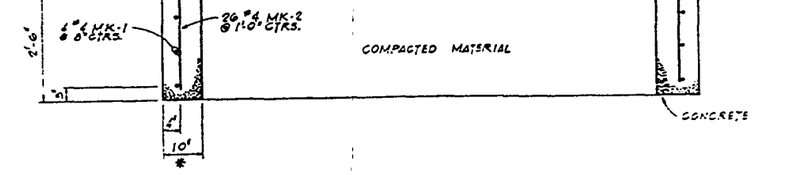


SECTION 'G-G'
SCALE: 3/8"=1'-0"

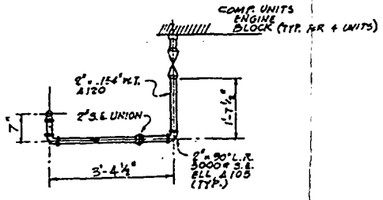
SECTION 'E-E'
SCALE: 1/2"=1'-0"



SECTION 'F-F'
SCALE: 1/2"=1'-0"



SECTION 'B-B'
SCALE: 3/4"=1'-0"



SECTION 'C-C'
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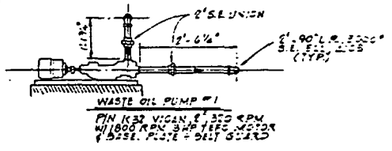


SECTION 'D-D'
SCALE: 1/2"=1'-0"

REV	DATE	DESCRIPTION	DR. CHK.	APP.

DWG. NO.	DESCRIPTION
9-AB-205	KEY PIPING PLAN
9-SD-A11-70	WASTE OIL STORAGE TANK - PLAN

REFERENCE DRAWINGS

TRANSWESTERN PIPELINE COMPANY

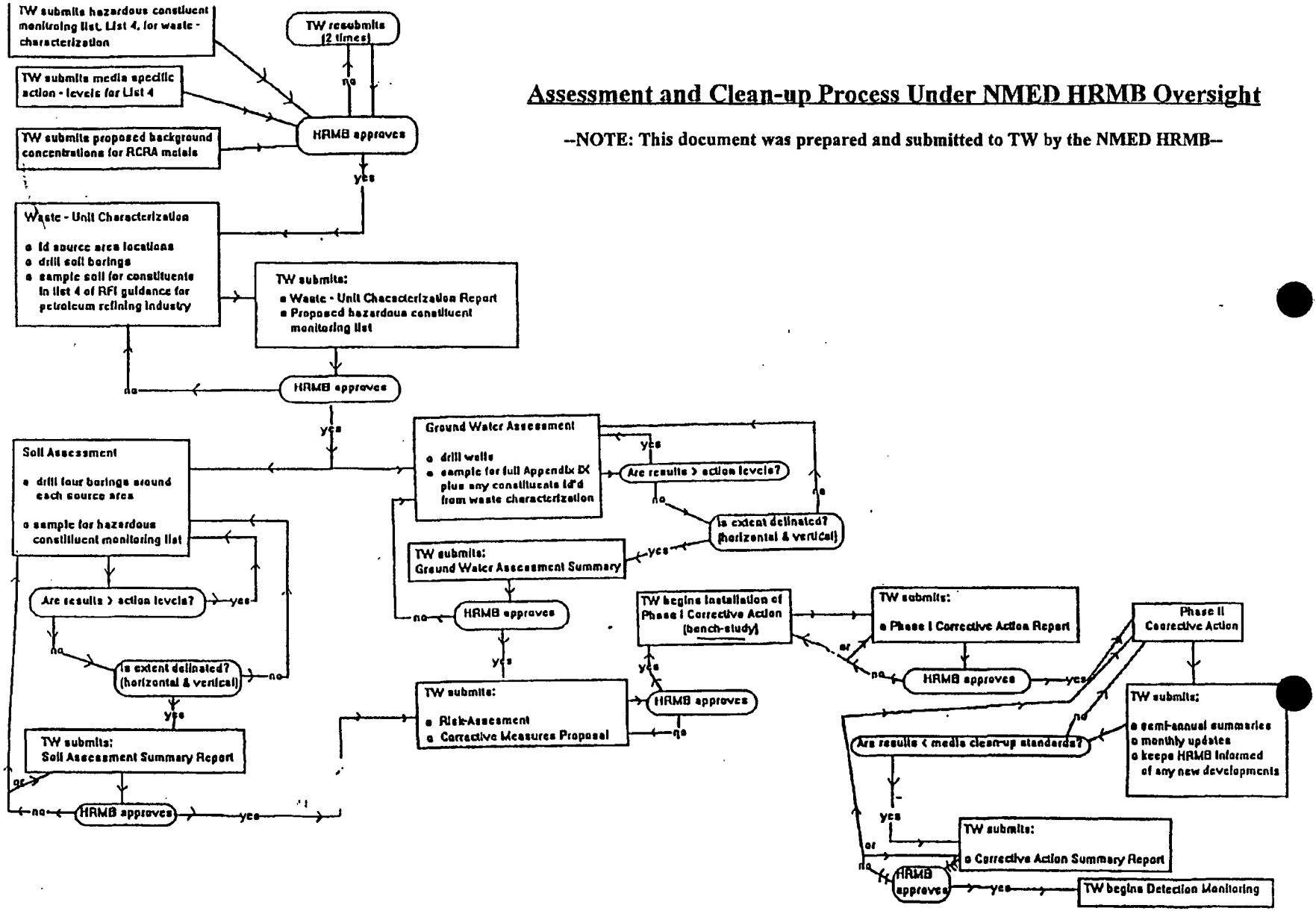
WASTE OIL STORAGE TANK
SECTIONS, TANK & DIKE DETAILS
STATION #9

SCALE	NOTED	DATE	AFE - 22419
DRAWN	J.C. WILSON	2-15-03	JOB NO.
CHECKED		10-5-A4	DRAWING NO.
APPROVED			9-15-A11-71
APPROVED	ENG.		

Attachment F

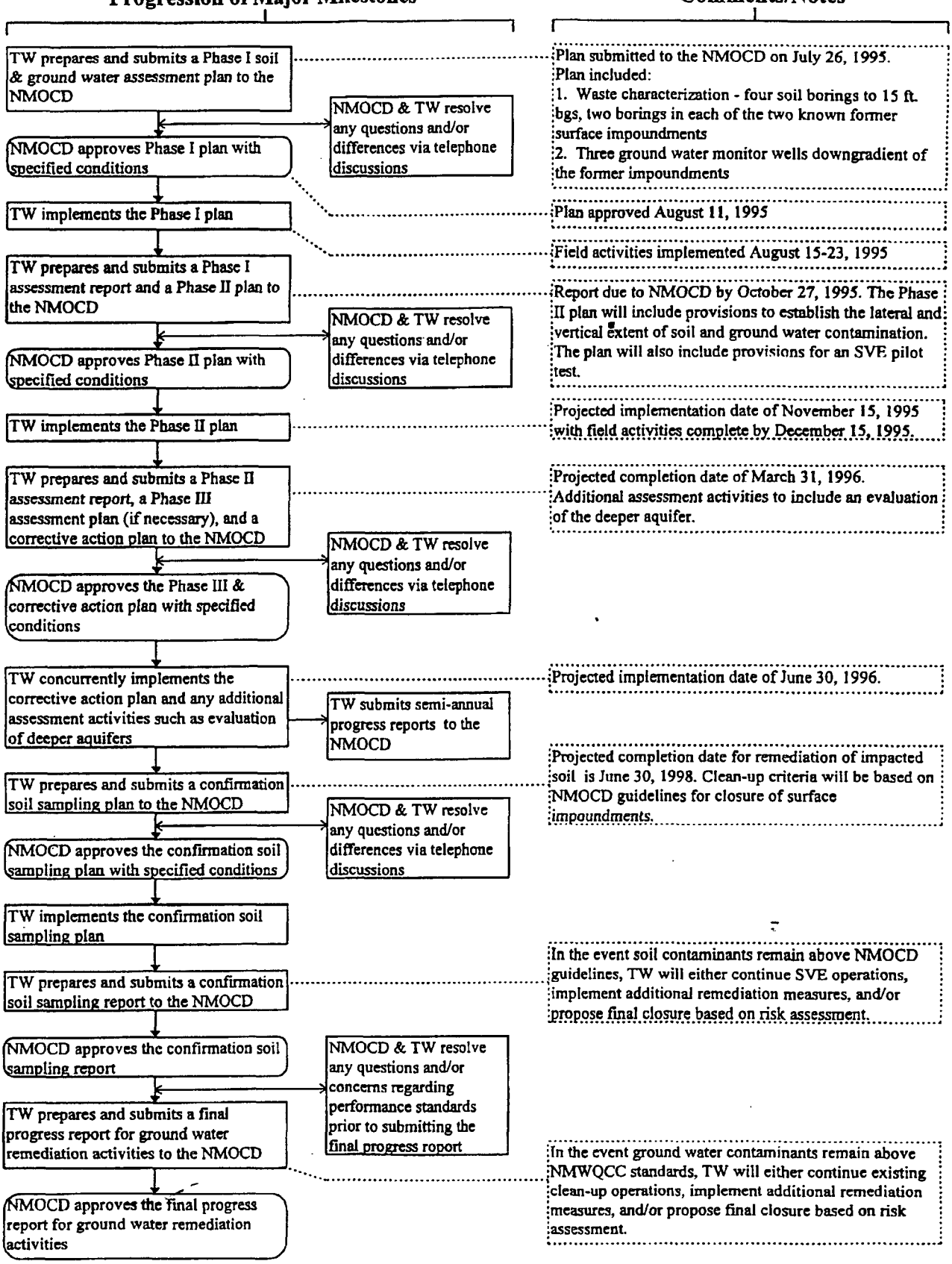
Assessment and Clean-up Process Under NMED HRMB Oversight

--NOTE: This document was prepared and submitted to TW by the NMED HRMB--



Assessment and Clean-up Process Under NMOCD Oversight

–NOTE: This document does not represent an approved NMOCD process–



NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. Pacheco
Santa Fe , New Mexico 87505

September 26, 1995

Mr. Bill Kendrick
ENRON Operations Corp.
P.O. Box 1188
Houston, Texas 77251-1188

RE: MONITOR WELL SAMPLING
ROSWELL COMPRESSOR STATION
TRANSWESTERN PIPELINE CO.

Dear Mr. Kendrick:

Enclosed you will find the laboratory analytical results of the New Mexico Oil Conservation Division's (OCD) August 22, 1995 monitor well sampling at the ENRON Roswell Compressor Station.

If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc w/enclosure: Tim Gum, OCD Artesia District Supervisor
George Robinson, Cypress Engineering Services
Benito Garcia, NMED Hazardous and Radioactive Materials Bureau

Analytical Technologies, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. **508434**

August 30, 1995

New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Project Name/Number: ENRON ROSWELL

Attention: Bill Olsen

On **08/23/95**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure

Analytical Technologies, Inc.

CLIENT	: NMOCD	DATE RECEIVED	: 08/23/95
PROJECT #	: (NONE)		
PROJECT NAME	: ENRON ROSWELL	REPORT DATE	: 08/30/95

ATI ID: 508434

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	MW-3	AQUEOUS	08/22/95
02	MW-6	AQUEOUS	08/22/95
03	MW-5	AQUEOUS	08/22/95
04	MW-8	AQUEOUS	08/22/95

---TOTALS---

MATRIX	#SAMPLES
AQUEOUS	4

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : PURGEABLE HALOCARBONS/AROMATICS (EPA 601/602)
CLIENT : NMOCD ATI I.D.: 508434
PROJECT # : (NONE)
PROJECT NAME : ENRON ROSWELL

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
01	MW-3	AQUEOUS	08/22/95	NA	08/30/95	1
02	MW-6	AQUEOUS	08/22/95	NA	08/30/95	1
03	MW-5	AQUEOUS	08/22/95	NA	08/30/95	1

PARAMETER	UNITS	01	02	03
BENZENE	UG/L	<0.5	<0.5	<0.5
BROMODICHLOROMETHANE	UG/L	<0.2	<0.2	<0.2
BROMOFORM	UG/L	<0.5	<0.5	<0.5
BROMOMETHANE	UG/L	<1.0	<1.0	<1.0
CARBON TETRACHLORIDE	UG/L	<0.2	<0.2	<0.2
CHLOROBENZENE	UG/L	<0.5	<0.5	<0.5
CHLOROETHANE	UG/L	<0.5	<0.5	<0.5
CHLOROFORM	UG/L	<0.5	<0.5	<0.5
CHLOROMETHANE	UG/L	<1.0	<1.0	<1.0
DIBROMOCHLOROMETHANE	UG/L	<0.2	<0.2	<0.2
1,2-DIBROMOETHANE (EDB)	UG/L	<0.2	<0.2	<0.2
1,2-DICHLOROBENZENE	UG/L	<0.5	<0.5	<0.5
1,3-DICHLOROBENZENE	UG/L	<0.5	<0.5	<0.5
1,4-DICHLOROBENZENE	UG/L	<0.5	<0.5	<0.5
1,1-DICHLOROETHANE	UG/L	<0.2	<0.2	<0.2
1,2-DICHLOROETHANE (EDC)	UG/L	<0.5	<0.5	<0.5
1,1-DICHLOROETHENE	UG/L	<0.2	<0.2	<0.2
CIS-1,2-DICHLOROETHENE	UG/L	<0.2	<0.2	<0.2
TRANS-1,2-DICHLOROETHENE	UG/L	<1.0	<1.0	<1.0
1,2-DICHLOROPROPANE	UG/L	<0.2	<0.2	<0.2
CIS-1,3-DICHLOROPROPENE	UG/L	<0.2	<0.2	<0.2
TRANS-1,3-DICHLOROPROPENE	UG/L	<0.2	<0.2	<0.2
ETHYLBENZENE	UG/L	<0.5	<0.5	<0.5
METHYL-t-BUTYL ETHER	UG/L	<2.5	<2.5	<2.5
METHYLENE CHLORIDE	UG/L	<2.0	<2.0	<2.0
1,1,2,2-TETRACHLOROETHANE	UG/L	<0.2	<0.2 D(1)	<0.2
TETRACHLOROETHENE	UG/L	<0.5	<0.5	<0.5
TOLUENE	UG/L	<0.5	<0.5	<0.5
1,1,1-TRICHLOROETHANE	UG/L	<1.0	<1.0	<1.0
1,1,2-TRICHLOROETHANE	UG/L	<0.2	<0.2	<0.2
TRICHLOROETHENE	UG/L	<0.2	<0.2	<0.2
TRICHLOROFLUOROMETHANE	UG/L	<0.2	<0.2	<0.2
VINYL CHLORIDE	UG/L	<0.5	<0.5	<0.5
TOTAL XYLENES	UG/L	<0.5	<0.5	<0.5
SURROGATES:				
BROMOCHLOROMETHANE (%)		95	92	96
TRIFLUOROTOLUENE (%)		102	109	103

D(1)=DILUTED 1X, ANALYZED 08/29/95

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : PURGEABLE HALOCARBONS/AROMATICS (EPA 601/602)
CLIENT : NMOCD ATI I.D.: 508434
PROJECT # : (NONE)
PROJECT NAME : ENRON ROSWELL

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
04	MW-8	AQUEOUS	08/22/95	NA	08/30/95	1

PARAMETER	UNITS	04
BENZENE	UG/L	4.6
BROMODICHLOROMETHANE	UG/L	<0.2
BROMOFORM	UG/L	<0.5
BROMOMETHANE	UG/L	<1.0
CARBON TETRACHLORIDE	UG/L	<0.2
CHLOROBENZENE	UG/L	<0.5
CHLOROETHANE	UG/L	<0.5
CHLOROFORM	UG/L	<0.5
CHLOROMETHANE	UG/L	<1.0
DIBROMOCHLOROMETHANE	UG/L	<0.2
1,2-DIBROMOETHANE (EDB)	UG/L	<0.2
1,2-DICHLOROBENZENE	UG/L	<0.5
1,3-DICHLOROBENZENE	UG/L	<0.5
1,4-DICHLOROBENZENE	UG/L	<0.5
1,1-DICHLOROETHANE	UG/L	<0.2
1,2-DICHLOROETHANE (EDC)	UG/L	<0.5
1,1-DICHLOROETHENE	UG/L	<0.2
CIS-1,2-DICHLOROETHENE	UG/L	<0.2
TRANS-1,2-DICHLOROETHENE	UG/L	<1.0
1,2-DICHLOROPROPANE	UG/L	<0.2
CIS-1,3-DICHLOROPROPENE	UG/L	<0.2
TRANS-1,3-DICHLOROPROPENE	UG/L	<0.2
ETHYLBENZENE	UG/L	<0.5
METHYL-t-BUTYL ETHER	UG/L	<2.5
METHYLENE CHLORIDE	UG/L	<2.0
1,1,2,2-TETRACHLOROETHANE	UG/L	<0.2
TETRACHLOROETHENE	UG/L	<0.5
TOLUENE	UG/L	<0.5
1,1,1-TRICHLOROETHANE	UG/L	<1.0
1,1,2-TRICHLOROETHANE	UG/L	<0.2
TRICHLOROETHENE	UG/L	<0.2
TRICHLOROFLUOROMETHANE	UG/L	<0.2
VINYL CHLORIDE	UG/L	<0.5
TOTAL XYLENES	UG/L	<0.5
SURROGATES:		
BROMOCHLOROMETHANE (%)		97
TRIFLUOROTOLUENE (%)		104

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS - QUALITY CONTROL

REAGENT BLANK

TEST	: EPA 601/602	ATI I.D.	: 508434
BLANK I.D.	: 082995	MATRIX	: AQUEOUS
CLIENT	: NMOCD	DATE EXTRACTED	: NA
PROJECT #	: (NONE)	DATE ANALYZED	: 08/29/95
PROJECT NAME	: ENRON ROSWELL	DIL. FACTOR	: 1

PARAMETER	UNITS	
BENZENE	UG/L	<0.5
BROMODICHLOROMETHANE	UG/L	<0.2
BROMOFORM	UG/L	<0.5
BROMOMETHANE	UG/L	<1.0
CARBON TETRACHLORIDE	UG/L	<0.2
CHLOROBENZENE	UG/L	<0.5
CHLOROETHANE	UG/L	<0.5
CHLOROFORM	UG/L	<0.5
CHLOROMETHANE	UG/L	<1.0
DIBROMOCHLOROMETHANE	UG/L	<0.2
1,2-DIBROMOETHANE (EDB)	UG/L	<0.2
1,2-DICHLOROBENZENE	UG/L	<0.5
1,3-DICHLOROBENZENE	UG/L	<0.5
1,4-DICHLOROBENZENE	UG/L	<0.5
1,1-DICHLOROETHANE	UG/L	<0.2
1,2-DICHLOROETHANE (EDC)	UG/L	<0.5
1,1-DICHLOROETHENE	UG/L	<0.2
CIS-1,2-DICHLOROETHENE	UG/L	<0.2
TRANS-1,2-DICHLOROETHENE	UG/L	<1.0
1,2-DICHLOROPROPANE	UG/L	<0.2
CIS-1,3-DICHLOROPROPENE	UG/L	<0.2
TRANS-1,3-DICHLOROPROPENE	UG/L	<0.2
ETHYLBENZENE	UG/L	<0.5
METHYL-t-BUTYL ETHER	UG/L	<2.5
METHYLENE CHLORIDE	UG/L	<2.0
1,1,2,2-TETRACHLOROETHANE	UG/L	<0.2
TETRACHLOROETHENE	UG/L	<0.5
TOLUENE	UG/L	<0.5
1,1,1-TRICHLOROETHANE	UG/L	<1.0
1,1,2-TRICHLOROETHANE	UG/L	<0.2
TRICHLOROETHENE	UG/L	<0.2
TRICHLOROFLUOROMETHANE	UG/L	<0.2
VINYL CHLORIDE	UG/L	<0.5
TOTAL XYLENES	UG/L	<0.5
SURROGATES:		
BROMOCHLOROMETHANE (%)		107
TRIFLUOROTOLUENE (%)		108

Analytical Technologies, Inc.

GAS CHROMATOGRAPHY - QUALITY CONTROL

MSMSD

TEST	: PURGEABLE HALOCARBONS/AROMATICS (EPA 601/602)		
MSMSD #	: 50843401	ATI I.D.	: 508434
CLIENT	: NMOCD	DATE EXTRACTED	: NA
PROJECT #	: (NONE)	DATE ANALYZED	: 08/30/95
PROJECT NAME	: ENRON ROSWELL	SAMPLE MATRIX	: AQUEOUS
REF. I.D.	: 50843401	UNITS	: UG/L

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD
BENZENE	<0.5	10	9.3	93	9.5	95	2
CHLOROBENZENE	<0.5	10	9.7	97	10	100	3
1,1-DICHLOROETHENE	<0.2	10	7.5	75	7.9	79	5
TOLUENE	<0.5	10	9.5	95	9.7	97	2
TRICHLOROETHENE	<0.2	10	9.6	96	9.4	94	2

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

ATL Acct # 9508434

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Contract # 96-521.07-040

LABORATORY SAMPLE RECORD

	PROJ. NO.	PROJECT NAME	NO. OF CONTAINERS	601	602						REMARKS
		ENRON Roswell									
	SAMPLERS: (Signature)	Olson, Sanchez (505) 827-7154									
	DATE TIME	STATION LOCATION									
-01	950822 1200	MW-3	2	2							
-02	950822 1330	MW-6	2	2							
-03	950822 1445	MW-5	2	2							
-04	950822 1600	MW-8	2	2							

Relinquished by: (Signature)	Date / Time	Received by: (Signature)									: (Signature)
			SEALS INTACT ☒ YES ☐ NO								
Relinquished by: (Signature)	Date / Time	Received by: (Signature)									: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time								Remarks
	8/23/95 1500	Andrew Parker	8/23	1500							Cold = Y Inact = Y # = 8 Normal TAT

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

September 25, 1995

Mr. Bill Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Roswell Compressor Station
Transwestern Pipeline Company

Dear Bill,

Enclosed for your review is a copy of the laboratory results for soil and ground water samples collected during implementation of the Phase I Soil and Ground Water Assessment Plan at the Roswell Station. Transwestern's consultant, Daniel B. Stephens & Associates, is preparing a summary report of assessment activities which will also include a summary table of the laboratory results. The summary report will be delivered to your office for review by October 27, 1995.

If you have any questions or comments regarding the enclosed reports, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

xc: Larry Campbell TW Operations Technical Support Roswell, NM
George Robinson Cypress Engineering Services 3AC3142

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

August 29, 1995

Mr. Cornelius Amindyas
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
2444 Galisteo St., Bldg. A
Santa Fe, NM 87505

RE: Transwestern Pipeline Company Roswell Compressor Station

Dear Mr. Amindyas,

As we discussed during our telephone conversation last week, Transwestern has set a target date of September 15, 1995 to deliver to the NMED HRMB and NMED General Counsel a letter and supporting information for Transwestern's position on the regulatory status of the former surface impoundments at the subject facility.

If you have any questions or comments regarding this issue, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

gcr/BK

xc:	Lou Soldano	ENRON Operations Corp. Legal	EB4779
	Frank Smith	ENRON Corp. Legal	EB4844
	David Nutt	ENRON Corp. Legal	EB4848
	Richard Virtue	Taichert, Wiggins, Virtue, & Najjar	(via fax @ 505-983-8304)
	Roger Anderson	NMOCD	2040 S. Pacheco St., Santa Fe, NM 87505
	Tracy Hughes	NMED General Counsel	P.O. Box 26110, Santa Fe, NM 87502
	Teri Davis	NMED HRMB	P.O. Box 26110, Santa Fe, NM 87502

bc:

Mike Terraso	EOC/OTS/EAD	3AC3119
Bill Janacek	TPC	EB4001
Dave Owen	TPC Technical Operations	Roswell, NM
Laura Kunkel	TPC Technical Operations	Roswell, NM
Larry Campbell	TPC Technical Operations	Roswell, NM
George Robinson	Cypress Engineering Services	3AC3142

OIL CONSERVATION DIVISION
2040 S. Pacheco
Santa Fe , New Mexico 87505

August 11, 1995

CERTIFIED MAIL
RETURN RECEIPT NO: Z-765-962-391

Mr. Bill Kendrick
ENRON Operations Corp.
P.O. Box 1188
Houston, Texas 77251-1188

RE: PHASE I INVESTIGATION WORK PLAN
ROSWELL COMPRESSOR STATION
TRANSWESTERN PIPELINE CO.

Dear Mr. Kendrick:

The New Mexico Oil Conservation Division (OCD) has completed a review of Transwestern Pipeline Company's (TPC) July 26, 1995 correspondence and July 10, 1995 "PHASE I SOIL AND GROUND WATER ASSESSMENT PLAN FOR ROSWELL COMPRESSOR STATION SURFACE IMPOUNDMENTS". These documents contain TPC's proposed work plan for additional soil and ground water contamination investigations at the Roswell Compressor Station.

The above referenced work plan is approved with the following conditions:

1. All monitor wells will be constructed with a minimum of 15 feet of well screen and will be installed with at least 10 feet of well screen below the water table and 5 feet of well screen above the water table.

2. All wastes generated will be disposed of only at sites approved by the OCD.

3. TPC will submit a report on the investigation to the OCD by October 27, 1995. The report will contain:

   a. A description of all activities which occurred during the investigation, conclusions and recommendations.

   b. A summary of the laboratory analytic results of soil samples from the boreholes and water quality sampling of the monitor wells.

c. A water table elevation map using the water table elevation of the ground water in all monitor wells.

d. A geologic log for each borehole and monitor well and as built well completion diagrams for each monitor well.

4. The OCD defers comment at this time on modifying the ground water monitoring schedule from quarterly to annual after a one year period.

5. TPC will notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.

6. All original documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Artesia District Office.

Please be advised that OCD approval does not relieve TPC of liability should the investigation activities determine that contamination exists which is beyond the scope of the work plan, or, if the activities fail to adequately determine the extent of contamination related to TPC's activities. In addition, OCD approval does not relieve TPC of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Tim Gum, OCD Artesia District Supervisor
George Robinson, Cypress Engineering Services, Inc.
Benito Garcia, NMED Hazardous and Radioactive Materials Bureau

Z 765 962 391

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PS Form **3800**, March 1993

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ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

July 26, 1995

Mr. Roger Anderson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Roswell Compressor Station
Transwestern Pipeline Company

Dear Roger,

Enclosed for your review is a copy of the Phase I Soil and Ground Water Assessment Plan for the subject facility. Transwestern has tentatively scheduled to initiate field activities on July 31, 1995.

If you have any questions regarding this work plan, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

July 26, 1995

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de Los Marquez
P.O. Box 26110
Santa Fe, NM 87502

RE: Comments to the HRMB Modified Closure Plan for the Former Surface Impoundments at the Transwestern Pipeline Company Roswell Compressor Station

Dear Ms. Hoditschek,

Enclosed is the HRMB modified version of the closure plan dated July 13, 1995 with Transwestern's comments marked on the plan in blue ink.

These comments were prepared and submitted as requested by the HRMB in a cooperative effort to continue to move forward with the assessment and remediation of subsurface impacts at the Roswell Station. However, Transwestern continues to maintain that there is considerable uncertainty regarding the regulatory status of the former surface impoundments. In an effort to resolve this issue, Transwestern has obtained the services of outside legal counsel located in Santa Fe. Transwestern's counsel is currently involved in discussions with the NMED's General Counsel regarding this issue. In light of the ongoing discussions, Transwestern strongly urges the HRMB to postpone the public comment period until after this issue is resolved. In the meantime, Transwestern will move forward with plans to implement most aspects of the "Waste and Unit Characterization" portion of the modified closure plan in order to avoid any more delays in assessment activities. These activities are tentatively scheduled to start August 7, 1995. As stated in the July 24, 1995 letter from Transwestern's counsel to NMED's General Counsel, Transwestern representatives are available to meet with NMED to discuss Transwestern's ongoing investigation of the site.

If you have any questions regarding the comments presented in this letter, please contact me at (713) 646-7644, and for questions regarding comments made to the modified closure plan, please contact George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

gcr/BK

xc:	Lou Soldano	ENRON Operations Corp. Legal	Houston, TX
	Frank Smith	ENRON Corp. Legal	Houston, TX
	David Nutt	ENRON Corp. Legal	Houston, TX
	Richard Virtue	Taichert, Wiggins, Virtue, & Najjar	Santa Fe, NM
	Roger Anderson	NMOCD	Santa Fe, NM
	Tracy Hughes	NMED General Counsel	Santa Fe, NM

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

July 12, 1995

Mr. Roger Anderson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Roswell Compressor Station
Transwestern Pipeline Company

Dear Roger,

Enclosed for your review is a copy of the Phase I Soil and Ground Water Assessment Plan for the subject facility. Transwestern has tentatively scheduled to initiate field activities on July 31, 1995.

If you have any questions regarding this work plan, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

xc: Barbara Hoditschek NMED HRMB Santa Fe, NM

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

June 30, 1995

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de Los Marquez
P.O. Box 26110
Santa Fe, NM 87502

RE: Notice of Soil and Ground Water Sampling Activities
Transwestern Pipeline Company Roswell Compressor Station

Dear Ms. Hoditschek,

The purpose of this letter is to notify the NMED HRMB that Transwestern Pipeline Company will implement a self-directed soil and ground water assessment plan at the subject facility as indicated in our previous correspondence. Field activities are currently scheduled to start on Monday, July 17, 1995. Representatives of the NMED HRMB are welcome at the site during these activities to witness sample collection procedures and/or to collect split samples.

The objective of the soil and ground water assessment plan is to identify waste constituents of concern and their respective maximum concentrations in both soil and shallow ground water. This will be accomplished by the collection and analysis of soil samples collected from within the areas of the two former surface impoundments and the collection and analysis of ground water samples collected from the uppermost aquifer.

In regard to the collection of soil samples, four soil borings will be advanced within the boundaries of the two former impoundments to a total depth of about 15 feet below ground surface. Two borings will be located within the boundary of each impoundment (diagram attached). One soil sample will be collected from near the bottom of each soil boring.

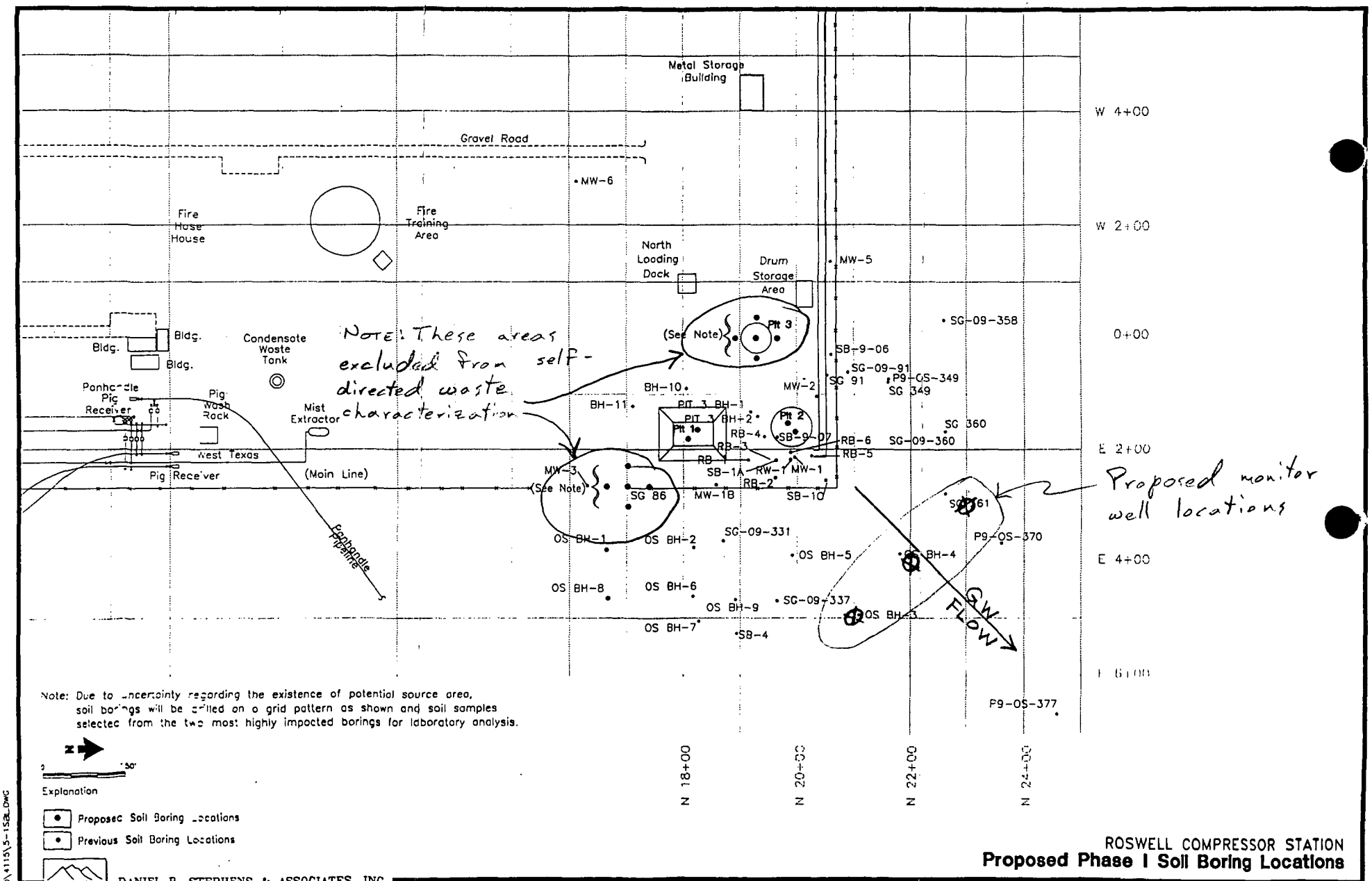
In regard to the collection of shallow ground water samples, three soil borings will be drilled at a location hydraulically downgradient of the former impoundments as indicated on the attached diagram. Each boring will be drilled to a depth of approximately 65 feet below ground surface. Each soil boring will subsequently be completed as a two inch diameter monitor well.

Field activities are anticipated to be completed within six working days.

Sincerely,

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

xc:	Lou Soldano	ENRON Operations Corp. Legal	Houston, TX
	Frank Smith	ENRON Corp. Legal	Houston, TX
	David Nutt	ENRON Corp. Legal	Houston, TX
	Richard Virtue	Taichert, Wiggins, Virtue, & Najjar	Santa Fe, NM
	Roger Anderson	NMOCD	Santa Fe, NM



Note: Due to uncertainty regarding the existence of potential source area, soil borings will be drilled on a grid pattern as shown and soil samples selected from the two most highly impacted borings for laboratory analysis.

Explanation

- Proposed Soil Boring Locations
- Previous Soil Boring Locations

D\4115\S-152.DWG

DANIEL B. STEPHENS & ASSOCIATES, INC.

ROSWELL COMPRESSOR STATION

Proposed Phase I Soil Boring Locations

Figure 4-1

ENRON
OPERATIONS CORP.
P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

May 30, 1995

VIA FEDERAL EXPRESS - PROOF OF DELIVERY REQUESTED

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de Los Marquez
P.O. Box 26110
Santa Fe, NM 87502

RE: **Summary for the March 30, 1995 meeting between TPC and the NMED HRMB - Transwestern Pipeline Company (TPC) Compressor Station No. 9, Roswell, New Mexico**

Dear Ms. Hoditschek,

The purpose of this letter is twofold: 1) to summarize TPC's current understanding of what was discussed and/or resolved during our March 30, 1995 meeting, and 2) to present additional comments relevant to these issues.

Present at the meeting were the following:

Representing TPC:	
Bill Kendrick	ENRON Operations Corp. (TPC's parent company)
George C. Robinson	Cypress Engineering Services
Kathleen OReilly	Cypress Engineering Services
Jeff Forbes	Daniel B. Stephens & Associates

Representing NMED HRMB:	
Barbara Hoditschek	NMED HRMB
Ron Kern	NMED HRMB
Teri Davis	NMED HRMB
Cornelius Amindyas	NMED HRMB

The following is a summary of each issue discussed along with any other pertinent comments made during the discussion. In addition to the summary of what was discussed during our meeting, we have included additional comments relevant to each issue.

1. Constituent monitoring list and analytical methods for waste characterization

Discussion Summary

Teri Davis has requested that the monitoring list include those constituents listed for petroleum refining in List 4 of RFI guidance. George Robinson and Jeff Forbes suggested the list include the volatile organic compounds normally reported for analysis by EPA Method 8240, semi-volatile organic compounds normally reported for analysis by Method 8270, PCB compounds by Method 8080, the seventeen Appendix IX metals, cyanide, and sulfide. It was agreed that TPC would submit a table of constituents comparing each suggested monitoring list and the rationale for inclusion or exclusion of each constituent.

Additional TPC Comments

TPC is in receipt of the NMED's letter dated April 28, 1995, requesting, among other items, a waste unit characterization constituent monitoring list. This list has been prepared and submitted to the NMED attached to a transmittal letter dated May 10, 1995. This list includes all constituents listed in the RFI guidance "List 4" with the exception of three volatile organic compounds. An explanation for the exclusion of these three compounds is presented in the transmittal letter.

2. Media specific action levels for waste characterization constituent monitoring list

Discussion Summary

George Robinson suggested development of action levels subsequent to completion of waste characterization. This would allow TPC to develop action levels only for those constituents detected and their degradation products. Teri Davis reiterated that the NMED will require action levels developed prior to waste characterization. George Robinson commented that published action levels or toxicity data may not be available for all constituents on the monitoring list. Ron Kern commented that he would like to see the algorithms and assumptions used in calculating action levels reprinted as supporting data to whatever TPC prepares for submittal. George Robinson asked about action levels for total petroleum hydrocarbon (TPH) concentrations. The NMED responded that this will be coordinated with the NMOCD.

Additional TPC Comments

TPC is in receipt of the NMED's letter dated April 28, 1995 requesting, among other items, action levels developed subsequent to waste unit characterization. However, TPC was also requested to supply action levels for those constituents listed in selected tables from the closure plan within a week of receipt of the April 28th letter. These tables were revised and submitted to the NMED attached to a transmittal letter dated May 10, 1995. However, rather than provide "action levels", TPC provided reference concentration levels in the modified tables. An explanation for this response is presented

in the transmittal letter.

3. Background concentrations for metals

Discussion Summary

Jeff Forbes presented the information he obtained from a USGS study for all but three of the metals included in List 4 of the RFI guidance. This information represents background concentrations of metals based on soil samples collected within the United States. Teri Davis said she would prefer more local data. Kathleen OReilly asked how many samples were necessary to adequately establish background concentrations. Teri Davis replied it would be up to TPC to demonstrate that a statistically significant number of samples were collected and analyzed. George Robinson suggested that the three metals for which background data were not available (cadmium, silver, and thallium) be eliminated from the constituent monitoring list since they have not been constituents of concern at other ENRON facilities nor are expected to be constituents of concern at this facility. Ron Kern responded that the NMED could require that background concentrations be assumed equal to zero. Jeff Forbes said that he will continue to look for other sources of information for background concentrations of the three metals in question.

Additional TPC Comments

TPC is in receipt of the NMED's letter dated April 28, 1995 requesting, among other items, background concentrations of metals in soil to be submitted subsequent to waste unit characterization. Jeff Forbes (DBS) is continuing to work on this issue.

4. Assessment plan for storm water runoff areas

Discussion Summary

Teri Davis indicated that the NMED will request an assessment plan for sample collection and analysis of potential releases to storm water runoff areas.

Additional TPC Comments

TPC is in receipt of the NMED's letter dated April 28, 1995, requesting, among other items, a sampling and analysis plan to address potential releases to storm water runoff areas. The NMED has requested that this plan is submitted subsequent to waste unit characterization.

5. Compliance schedule

Discussion Summary

Teri Davis indicated that the NMED will request a compliance schedule for implementation of the closure plan. Barbara Hoditschek suggested a 90 day compliance

time frame for submittal of the waste characterization report.

Additional TPC Comments
TPC is in receipt of the NMED's letter dated April 28, 1995, requesting, among other items, a compliance schedule for implementation of the closure plan. The NMED has requested that this schedule is submitted within a week of receipt of the April 28th letter. This was submitted to the NMED attached to a transmittal letter dated May 10, 1995.

6. Response time for items 1-5 above

Discussion Summary
Barbara Hoditschek indicated that TPC would have 30 days to respond, from the date of receipt, to a letter from the NMED requesting items 1-5 above.

Additional TPC Comments
TPC is in receipt of the NMED's letter dated April 28, 1995, requesting a response to seven items. TPC was requested to respond to the first four items within a week of receipt of the letter and the remaining three items within thirty days of completion of the waste unit characterization. A response to the first four items requested was submitted to the NMED attached to a transmittal letter dated May 10, 1995.

7. Waste characterization prior to public notice

Discussion Summary
George Robinson suggested implementation of the waste characterization plan prior to finalizing the Phase I soil assessment plan. This information could be used to limit the development of action levels to only those constituents detected during waste characterization. This information could also be used to establish indicator parameters and/or constituents and the most effective analysis methods to be used during the soil assessment. Bill Kendrick indicated that, regardless of whether or not there is an approved closure plan, TPC will complete its own waste characterization prior to a closure plan going to public notice. This would be required in order for TPC to answer questions the public may potentially ask.

Additional TPC Comments
The letter received from the NMED dated April 28, 1995, indicates that the NMED does not wish to consider completing the waste unit characterization plan prior to submitting the modified closure plan to public notice. In order to be in a position to respond to any inquires that the notice may generate as well as to further develop information which is relevant to the redemption of the site, TPC may implement a self directed waste characterization program which will include collection of soil samples from locations within the two confirmed former surface impoundment areas and the installation and

sampling of two downgradient ground water monitor wells. TPC will notify the NMED at least two weeks prior to field activities so that the NMED has the opportunity to split samples if the NMED should so desire.

8. Scope for delineation during soil assessment

Discussion Summary

Teri Davis presented a conceptual plan for the lateral delineation of affected soil. Teri Davis and Ron Kern suggested TPC provide input into final development of the soil assessment plan. George Robinson is to contact Teri Davis to discuss this issue further. Teri Davis asked that TPC present QA/QC information for a mobile lab prior to implementation of field work. Teri Davis and Ron Kern asked that TPC present information supporting a correlation between TPH concentration and potential constituents of concern.

Additional TPC Comments

TPC is in receipt of the NMEDs letter dated April 28, 1995, requesting, among other items, a Standard Operating Procedure and QA/QC information for use of a mobile laboratory during implementation of the soil assessment program. This information was obtained from Analytical Technologies Inc. (ATI) of Phoenix, Arizona and submitted to the NMED attached to a transmittal letter dated May 10, 1995.

9. Scope for delineation during ground water assessment

Discussion Summary

This issue was not discussed in much detail, although, Teri Davis did express her opinion that ground water contaminants have likely migrated a distance of 1.5 miles from the site. George Robinson responded with his opinion that ground water contaminants have likely migrated a distance of less than 900 feet from the site.

Additional TPC Comments

We believe it is in the best interest of both TPC and the NMED that any discussions regarding the distance to which contaminants may have migrated off-site be limited to discussions between TPC, the NMED, and the NMOCD until confirmation of such information is available.

10. Permit status

Discussion Summary

Bill Kendrick inquired about the status of the Part A permit application which TPC has on file with the NMED. Barbara Hoditschek and Cornelius Amindyas indicated that they were not aware that a Part A permit application was on file. Bill Kendrick pointed out

that the Part A permit application was specifically discussed in previous meetings between TPC and the NMED. Barbara Hoditschek indicated that she would look into this issue. George Robinson asked where does the RFA fit into the process if the facility is not a permitted facility. Teri Davis responded that it was to assess other areas of concern. TPC was still not clear on this issue.

Barbara Hoditschek made it clear that the NMED intended to modify the most recent closure plan submitted by TPC and to submit the modified plan for public notice. Initially, it was indicated that TPC would not be allowed to review the modified closure plan prior to public notice. However, after further discussion, it was indicated that the NMED would consider making the modified plan available to TPC for review prior to public notice. Barbara Hoditschek and Cornelius Amindyas indicated that a modified plan would be ready for public notice no later than June 1995.

Additional TPC Comments

From the discussion at the March 30, 1995 meeting and the history of this matter, it is apparent to TPC that the regulatory status of the facility is unclear and subject to debate as to the applicable law and regulations. Subsequent to the March 30, 1995 meeting, TPC has received the April 10, 1995 letter from NMED addressing the status of the facility. That letter indicates that NMED believes that 40 CFR Section 265 applies to the facility. NMED indicates that that section cites the "minimum standards for acceptable hazardous waste management until certification of a final closure". However, the April 10, 1995 letter does not cite any underlying facts upon which to base the conclusion that 40 CFR part 265 applies to this facility. TPC is continuing to conduct its analysis of the appropriate regulatory treatment for this facility, and requests that NMED provide it with the underlying factual basis for its proposed regulatory treatment of the facility.

Because of the uncertainty of the regulatory status of the facility, TPC requests that NMED postpone its current plan to submit a modified closure plan for public notice no later than June, 1995, so that NMED and TPC can attempt to arrive at a mutually acceptable regulatory treatment of the facility.

If you have any questions and/or comments regarding the information presented in this document, please contact me at (713) 646-7644.

Sincerely,

Bill Kendrick (KMT)

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

xc:	Lou Soldano	ENRON Operations Corp. Legal, Houston, TX
	Frank Smith	ENRON Corp. Legal, Houston, TX
	David Nutt	ENRON Corp. Legal, Houston, TX
	Richard Virtue	Taichert, Wiggins, Virtue, & Najjar Santa Fe, NM
	Roger Anderson	NMOCD, Santa Fe, NM

FAX (505) 625-8060

Phone (505) 623-2761

October 5, 1995

Transwestern Pipeline Company
TECHNICAL OPERATIONS
6381 North Main • Roswell, New Mexico 88201

Mr. Roger Anderson
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Site Inspection Sta. 9, Roswell

Dear Mr. Anderson:

As a result of the Oil Conservation Division's (OCD) September 11, 1995 inspection of Transwestern Pipeline Company's Compressor Station No. 9 Roswell, presented below are responses to address concerns brought about by Pat Sanchez and Mark Ashley of your staff:

1. **Rainwater collection in the oily wastewater sump and secondary containment**.
Due to the recent heavy rains which had occurred at he facility, rainwater had infiltrated into the annular space between the below grade sump through the openings in the sump cover for the above ground piping. Transwestern has sealed this space with silicone caulking to eliminate future rainwater or snow melt from entering into this area. The attached photograph verifies completion of this task.

2. **Disposal of regulated liquids into the sink at the PCB laboratory**.
In conversations with the laboratory personnel at the facility, they have stated that under no circumstances have any laboratory reagents, cleaning liquids or wash water been directed into that sink. The purpose of the faucet is to provide potable water to gas quality measurement operations in the building. All laboratory wastes generated at this location are collected and transferred to the laboratory waste tank for sampling and proper disposal.

3. **Miscellaneous 5 and 50 gallon buckets and drums under the drum storage dock**.
The materials contained in the drums and buckets identified during the OCD's inspection have been properly labeled and stored according to DOT requirements. The drums have also been removed from the location. Photographs of the area around and under the drum dock substantiates their removal from this area.

4. **The presence of oil stained soil around the oil loading tank pump**.
The contaminated soil in this area has been remediated with an inorganic fertilizer to enhance bioremediation of the hydrocarbon contamination in the soil. Refer to the photographs presenting the fertilizer on the soil stained area.

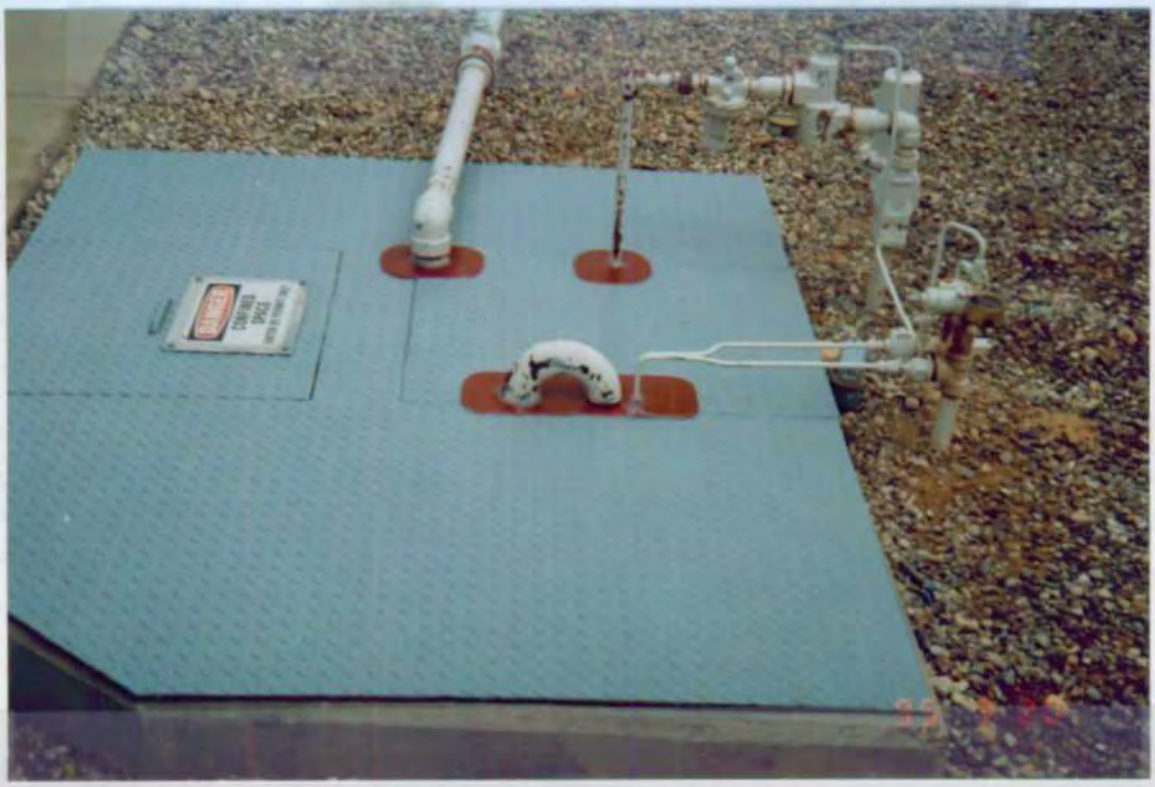
Should you require additional information concerning the above responses, contact our Roswell Technical Operations at (505) 625-8022.

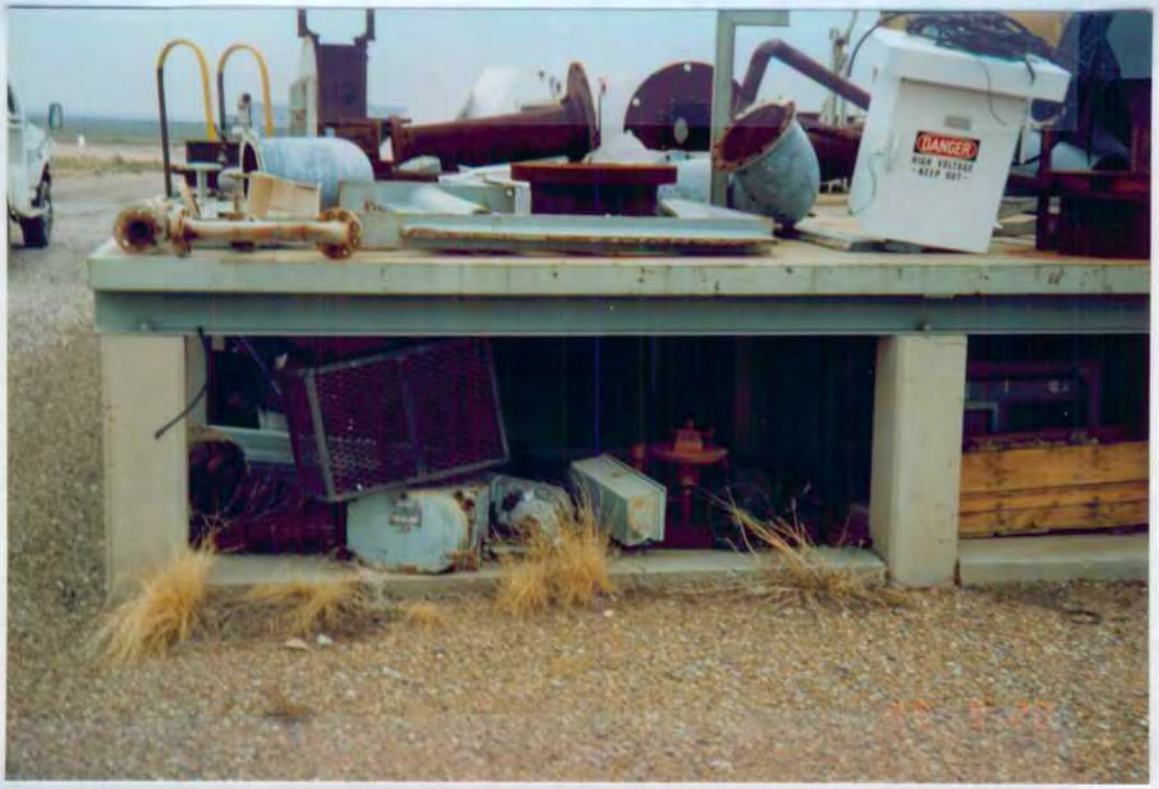
Sincerely,

Larry Campbell

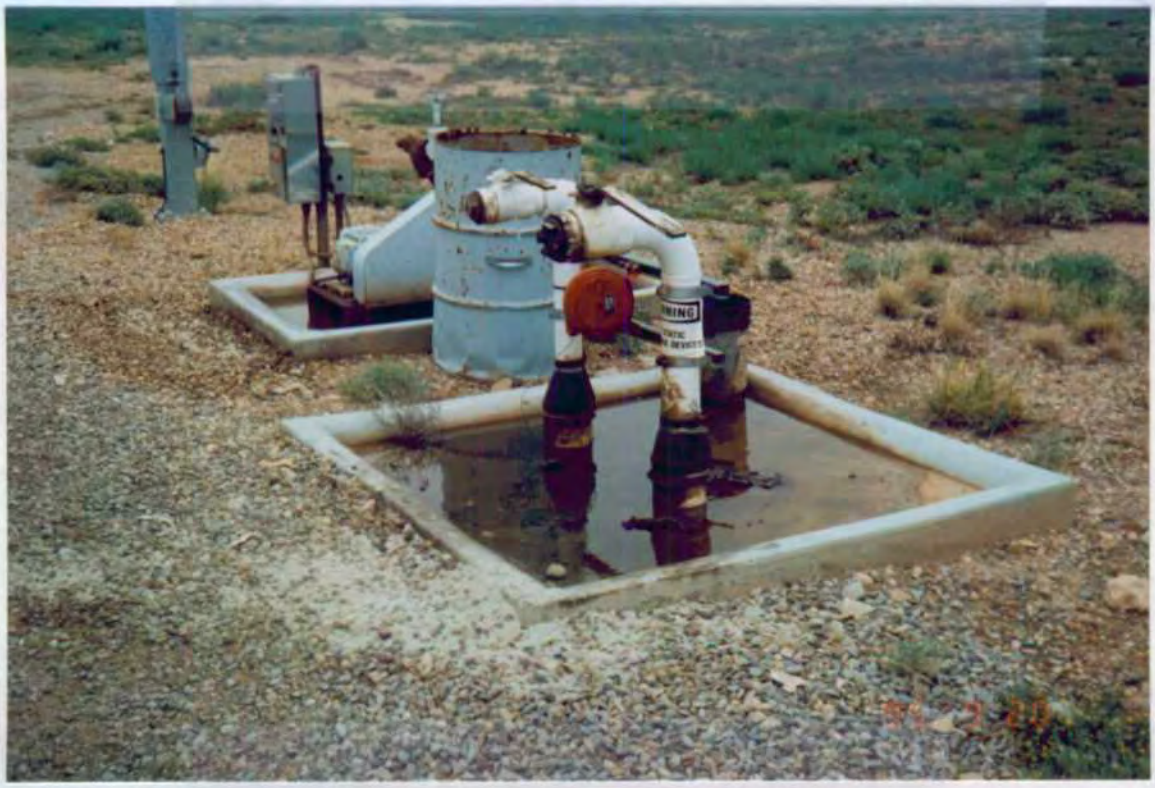
Larry Campbell
Division Environmental Specialist

xc: Dave Owen
Joe Hulscher
Arnie Bailey
Butch Russell
Capitan Team
file




DANGER
HIGH VOLTAGE
KEEP OUT


ALPHA



OIL CONSERVATION DIVISION

September 29, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-073

Mr. Larry Campbell
Transwestern Pipeline Company
P.O. Box 1717
Roswell, NM 88202-1717

RE: Discharge Plan GW-52
Roswell Compressor Station-Inspection notes/report
Chaves County, New Mexico

Dear Mr. Campbell:

The NMOCD has prepared the following inspection report and attached the inspection notes from the September 11, 1995 Roswell Compressor Station discharge plan renewal inspection for the facility located in SW/4 SW/4, Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico.

1. GW-52 appears to be in general compliance with the discharge plan and was renewed based on this inspection and the additional information and comments/clarifications as submitted by Mr. Campbell on September 21, 1995.
2. A few problems with labelling and empty drums were observed , Mr. Campbell made the commitment to address these issues.
3. It was requested that the lab sink be disconnected from the POTW - Mr. Campbell will follow up on this request.

If you have any questions, please feel free to call me at (505)-827-7156.

Sincerely,

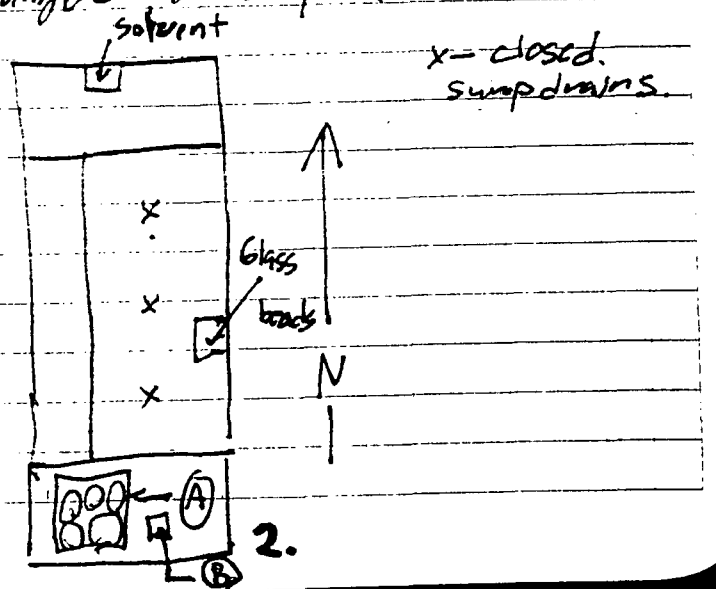
Patricio W. Sanchez
Petroleum Engineer

xc: Environmental Representative District II

(A) Drums on 2ndary Containment Area.

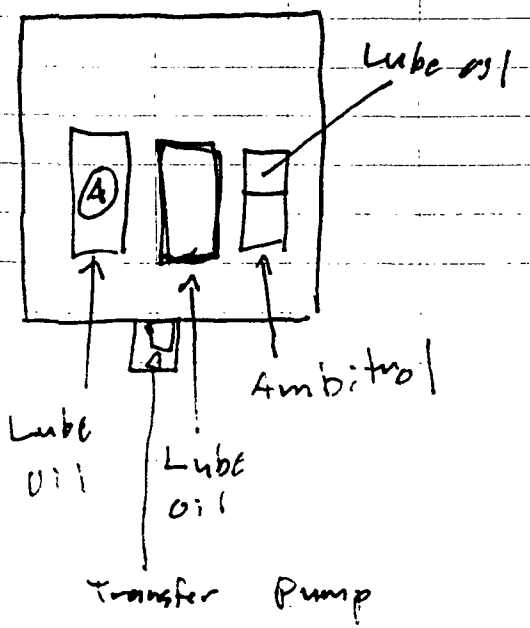
(B) Plugged wash rack.

DATE. 9/11/95 TIME: 1:00 pm
ENRON ROSWELL C.S. GW-52
Machine Shop Area
- Drains plugged - Not in use
- shop solvent - Zep Bio-friendly.
- A Few trash cans - Domestic waste. (W.M. SE NM.)
- Red rag service - American in Roswell.
- One Bead blaster - waste tested - usually handled as Domestic waste - used up/ changed 2-3 yrs.



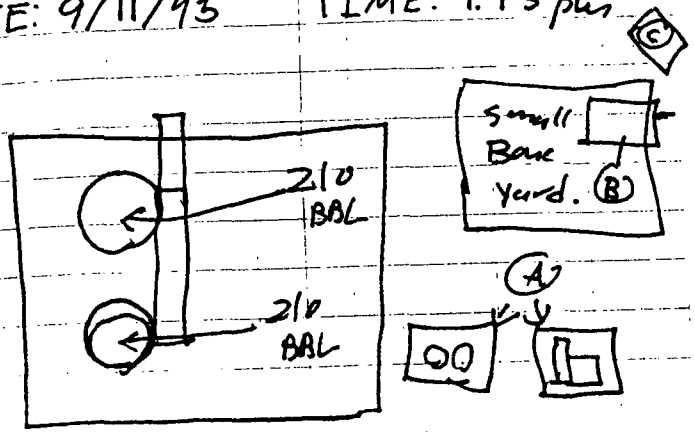
2.

Lube oil TANK AREA



(A) 6,000 gallons Each.

DATE: 9/11/95 TIME: 1:15 pm



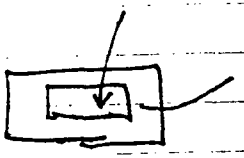
USED Oil TANK AREA

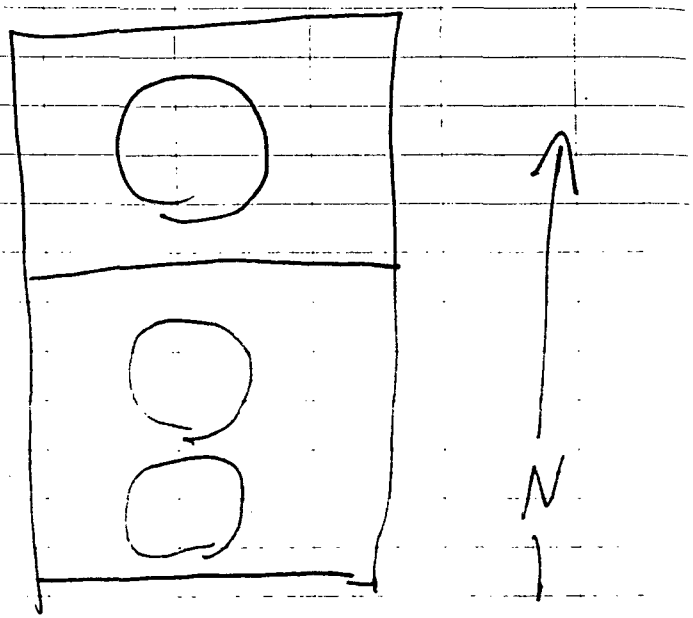
(A) Loading pump Area - Rainwater sucked up by EOT w/ used oil.

(B) Soap drums.

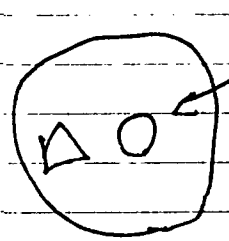
(C) used Lube oil filter.

Diesel fuel (1,000 gal)



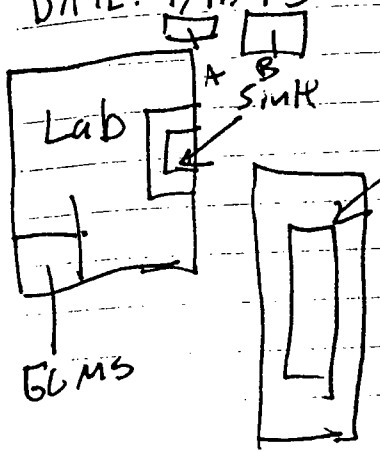


Pipeline liq./ oily waste water storage Area.



Fire training Area - All contained - No water - dry chemical Media used to fight fires.

DATE: 9/11/95 TIME: 2:00 pm.



Lab waste Characterized & disposed of properly.

- If tests NON-HAZ. goes with oily waste water.

- Sink drains to POTW - recieves incidental Lab rinse - Asked to disconnect sink from POTW.

(A) More dedicated

(B) dumpsters.

OIL CONSERVATION DIVISION

September 26, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-062

Mr. Larry Campbell
Division Environmental Specialist
Transwestern Pipeline Company
6381 North Main
Roswell, NM 88201

RE: Approval of Discharge Plan GW-52
Renewal
Roswell Compressor Station
Eddy County, New Mexico

Dear Mr. Campbell:

The **discharge plan renewal GW-52 for the Transwestern Pipeline Company Roswell Compressor Station** located in SW/4 SW/4, Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan renewal consists of the application and its contents dated May 8, 1995 and subsequent additional information dated September 21, 1995 as signed and submitted by Mr. Larry Campbell with Transwestern Pipeline Company .

The discharge plan renewal application was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve Transwestern Pipeline Company of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4, this plan is for a period of five (5) years. This approval will expire November 9, 2000, and you should submit an application for renewal six (6) months before this date.

The discharge plan renewal for the Roswell Compressor Station GW-52 is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty dollars ($50) plus the flat fee of six-hundred and ninety dollars ($690) for Compressor stations exceeding 3,000 horsepower filing for renewal of existing discharge plans..

The $50 filing fee has been received by the OCD. The flat fee for an approved discharge plan has not been received by the OCD. The flat fee check should be submitted to the **NMED - Water Quality Management** through the NMOCD office in Santa Fe, New Mexico.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/pws
Attachment

xc: District II Environmental Representative

ATTACHMENT TO DISCHARGE PLAN GW-52 RENEWAL
Transwestern Pipeline Company - Roswell Compressor Station
DISCHARGE PLAN REQUIREMENTS
(September 26, 1995)

1. Tank Berming: All tanks that contain materials other than fresh water that, if released, could contaminate surface or ground water or the environment will be bermed to contain 1 1/3 times the capacity of the tank or 1 1/3 times the volume of all interconnected tanks.

2. Drum Storage: All drums will be stored on pad and curb type containment.

3. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

4. Modifications: All proposed modifications that include the construction of any below grade facilities or the excavation and disposal of wastes or contaminated soils will have OCD approval prior to excavation, construction or disposal.

5. Payment of Discharge Plan Fees: The six-hundred and ninety dollar ($690.00) flat fee shall be submitted upon receipt of this approval. The flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the five (5) year duration of the plan, with the first payment due upon receipt of this approval.

FAX (505) 625-8060

Phone (505) 623-2761

Transwestern Pipeline Company

TECHNICAL OPERATIONS
6381 North Main • Roswell, New Mexico 88201

September 21, 1995

Mr. Patricio Sanchez
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal Roswell Compressor Station, GW-52

Dear Mr. Sanchez:

In response to the Oil conservation Division's (OCD) August 3, 1995 letter, informing Transwestern Pipeline Company (Transwestern), of additional information to be included with the discharge plan renewal application for the Roswell Compressor Station., Presented below are responses to those concerns. Each response follows the sequence of the items addressed in your letter:

I. Transwestern requests that the October 31, 1990 supplement to the OCD be included in the 1995 permit application.

II. Transwestern is in compliance with the OCD's disposal regulations for exempt and non exempt wastes.

III. Transwestern does not dispose of any liquid waste streams at the Roswell Compressor Station. All liquid streams are either recycled, recovered or collected at the facility and transferred to the owner of the liquids. This last process is directed under contract obligations with a local producer. Presented as an attachment are the liquid waste stream and volumes which are generated at the facility, and the vendor and process which is used for each stream

IV. The secondary containment provided for the above ground tank in the May 8, 1995 renewal application has a containment capacity of greater than 1.3x the volume of the tank, and is also in compliance with the regulations set forth under 40 CFR 112 for Spill Prevention Control and Countermeasures.

Should you require any additional information concerning approval of the submitted discharge application, contact our Roswell Technical Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Dave Owen
Joe Hulscher
Arnie Bailey
Capitan Team
Butch Russell
file

WASTE STREAM APPROXIMATES FOR STATION 9

Used Oil Tank

1991	3700 Gallons
1992	3700 Gallons
1993	3700 Gallons
1994	1200 Gallons
1995	1200 Gallons
TOTAL	13500 Gallons
Yearly Average Over 5 Years	2700 Gallons

Oily Waste Water Tank

1991	3000 Barrels
1992	3000 Barrels
1993	3000 Barrels
1994	600 Barrels
1995	600 Barrels
Total	11100 Barrels
Yearly Average Over 5 Years	2220 Barrels

Pipeline Liquids Tank

1991	3000 Barrels
1992	3000 Barrels
1993	3000 Barrels
1994	600 Barrels
1995	600 Barrels
Total	11100 Barrels
Yearly Average Over 5 Years	2220 Barrels

Selexol Oily Waste Water Tank

1991	N/A
1992	N/A
1993	N/A
1994	N/A
1995	150 Barrels
Total	150 Barrels
Yearly Average Over 5 Years	30 Barrels

Selexol Pipeline Liquids Tank

1991	N/A
1992	N/A
1993	N/A
1994	N/A
1995	N/A
Total	N/A
Yearly Average Over 5 Years	N/A

FAX (505) 625-8060

Phone (505) 629-2761

Transwestern Pipeline Company
TECHNICAL OPERATIONS
6381 North Main • Roswell, New Mexico 88201

September 21, 1995

Mr. Patricio Sanchez
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

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Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Dave Owen
Joe Hulscher
Arnie Bailey
Capitan Team
Butch Russell
file

1891 - 1991

Roswell Daily Record

P.O. BOX 1897
Roswell, New Mexico
88202-1897

Address Correction Requested

RECEIVED
AUG 29 19[illegible]
Conservation D[illegible]

Energy, Minerals & Natural
PO Box 6429
State of NM
Santa Fe NM 87505-5472

OCD

AFFIDAVIT OF PUBLICATION

County of Chaves
State of New Mexico

I, Jean M. Pettit,
Bus. Manager,

Of the Roswell Daily Record, a daily newspaper published at Roswell, New Mexico, do solemnly swear that the clipping hereto attached was published once a week in the regular and entire issue of said paper and not in a supplement thereof for a period
of: one time weeks
.....
beginning with issue dated
July 17th , 1995
.....
and ending with the issue dated
July 17th , 1995
.....

.....
Manager

Sworn and subscribed to before me

this 17th day of
.....
July ,1995
.....

.....
Notary Public

My Commission expires

July 25 ,19 98

(SEAL)

Publish July 17, 1995

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan and renewal applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-52)-TRANSWESTERN PIPELINE COMPANY, Mr. Larry Campbell, 505-625-8022, P.O. BOX 1717, Roswell, NM, 88202-1717 has submitted a Renewal discharge plan application for their Roswell Compressor Station located in the SW/4 SW/4, Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico. Approximately 1000 gallons per day of wastewater will be transferred to an offsite livestock watering tank. The wastewater has a total dissolved solids concentration of about 1250 mg/l. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surfact is at a depth of approximately 240 feet with a total dissolved solids concentration of approximately 1,551 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to the ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Sante Fe, New Mexico, on this 10th day of July, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
/S/ william j lemay,

SEAL

WILLIAM J. LEMAY, Director

NOTICE OF PUBLICATION
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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 10th day of July, 1995

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/WILLIAM J. LEMAY, Director

Journal: July 15, 1995

STATE OF NEW MEXICO
County of Bernalillo SS

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for _____ times, the first publication being of the _____ day of _____, 1995, and the subsequent consecutive publications on _____, 1995

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this _____ day of _____ 1995

PRICE _____

Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER _____

OIL CONSERVATION DIVISION

July 31, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-100

Mr. Larry Campbell
Transwestern Pipeline Company
P.O. Box 1717
Roswell, NM 88202-1717

RE: Discharge Plan GW-52
Roswell Compressor Station-Renewal
Chaves County, New Mexico

Dear Mr. Campbell:

The NMOCD has received the proposed Roswell Compressor Station discharge plan renewal application for the facility located in SW/4 SW/4, Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico. The application filing fee in the amount of $50 was received by the NMOCD along with the discharge plan renewal application. The NMOCD has prepared and sent out the public notice for the Roswell Compressor Station facility as stated in WQCC section 3-108. NMOCD has conducted a preliminary review of the proposed discharge plan renewal as received from Transwestern Pipeline Company on May 12, 1995.

The following comments and request for additional information are based on the review of the Transwestern Renewal application. **Please note that unless otherwise stated, response to all comments shall be received and reviewed by the OCD prior to approval of the discharge plan application.** The response shall be sent to the NMOCD thirty (30) after receipt of this letter.

I. In the renewal letter dated May 8, 1995 Mr. Campbell requested that the permit be renewed based on the permit that was issued November 9,1990 by the NMOCD.

Comment: The permit shall include the November 9, 1990 permit as well as the November 18, 1993 Modification by NMOCD.

NOTE: The November 9, 1990 approval included the April 9, August 16, and September 26, 1990 supplements from Transwestern. The Approval should have also included the October 31, 1990 supplement from Transwestern - This Supplement shall also

become part of the 1995 permit renewal.

II. The Roswell Compressor Station is a mainline compressor - therefore very few if any of the waste streams at this facility are Exempt from RCRA. Streams that contain non-exempt wastes cannot not be injected in NMOCD approved class II injection wells - These wastes if they are non-hazardous by characteristics (TCLP) maybe disposed of at an approved NMOCD surface waste management facility.

III. All handlers of waste streams for offsite disposal need to listed. All liquid waste stream volumes on a gallons per month basis need to be listed in terms of an average.

NOTE: Transwestern Pipeline Company should be able to provide this information based on operating knowledge gained over the last five years of the permit.

IV. The above ground tank that is referenced in the May 8, 1995 renewal application shall comply with NMOCD secondary containment volume requirements of 1 1/3 times the volume of the tank.

Example: If the tanks internal volume is 100 bbl, the secondary containment shall be able to hold at least 133 bbl.

Submittal of the requested information and commitments within thirty (30) days of receipt of this letter will expedite the final review of the application and approval of the discharge plan.

If you have any questions, please feel free to call me at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineer

xc: Environmental Representative District II

AFFIDAVIT OF PUBLICATION

No. 35064

STATE OF NEW MEXICO
County of San Juan:

ROBERT LOVETT being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Tuesday, July 18, 1995

and the cost of publication was: $90.26

Robert Lovett

On 7/19/95 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.

Mary L. Beard

My Commission Expires March 21, 1998

COPY OF PUBLICATION

Legals

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, this 10th day of July, 1995.

STATE OF NEW MEXI
OIL CONSERVATION DIVISIC

/s/ William J LeM
WILLIAM J. LEMAY, Direct

SEAL

Legal No. 35064 published in The Daily Times, Farmington, New Mexico, Tuesday, July 18, 1995.

1. LEGALS

Publish July 17, 1995

NOTICE OF PUBLICATION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Sante Fe, New Mexico, on this 10th day of July, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
/S/ william j lemay,

SEAL

WILLIAM J. LEMAY, Director

Publish July 17, 24, 1995

FIFTH JUDICIAL DISTRICT
COUNTY OF CHAVES
STATE OF NEW MEXICO

IN THE MATTER OF THE ESTATE OF

KENNETH C. DENNIS, Deceased. No. PB-94-79

TO: DOROTHY C. DENNIS, ANNA GALLUP, LAURA GALLUP

Publish July 17, 24, 1995

IN THE PROBATE COURT
COUNTY OF CHAVES
STATE OF NEW MEXICO

IN THE MATTER OF THE ESTATE

OF NO. 7996

ARTHUR T. FREUDENBERGER, DECEASED.

NOTICE TO CREDITORS

The undersigned has been appointed Personal Representative of Arthur T. Freudenberger, deceased. All persons having claims against this estate are required to present their claims (i) within two months after the date of the first publication of this notice, or (ii) within two months after the mailing or delivery of this notice, whichever is later, or be forever barred.

/s/Ilima e freudenberger
Ilima E. Freudenberger
700 East Vista Parkway
Roswell, NM 88201

Publish July 13, 14, 16, 17, 1995

BID NOTICE

JANITORIAL SERVICE: The Chaves County Community Action Program is currently accepting bids for janitorial services for it's facility located at 209 E. Hendricks, Roswell. Deadline for bids is July 20, 1995. Interested bidders may obtain bid information by contacting Sam Parker at 209 E. Hendricks or calling 623-1782 in Roswell.

DON'T THROW GOOD MONEY AWAY.

Sell "DON'T NEEDS"

For cash with a CLASSIFIED AD!

5. Special Notices

WITNESS WANTED! If you witnessed the accident at Lea and Second on Thursday 6/29/95 at 4:38PM, please call 623-3799

15. Personals Special Notice

BANKRUPTCY
Free consultation, prompt filing, payment terms, call for estimate.
Harry G. W. Griffith
Albuquerque
1-800-894-1018

MASSAGE THERAPY
A NEW YOU!
Great for stress-insomnia. Gift certificates available. Appointment only. 625-9420

HERBS REALLY WORK Natures remedy for every disease. Weight loss, no chemicals, income opportunity. 622-5999.

DIVORCE, BANKRUPTCY, case preparation, reasonable rates. 625-0059.

25. Lost and

45. Jobs of Interest Male - Female

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WE OFFER:
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Paid Sick Days
Paid Holidays and Vacation Days
Optional Dental and Disability Insurance
Profit sharing Plan
Exceptional Employee Savings Plan
SEND RESUMES TO:
ATTN: JERRY TREVINO
810 TRAILING HEART ROAD
ROSWELL, NM 88210

The values you can find in the classified pages.

JOURNEYMAN ELECTRICIAN. We want an individual who wants a *career, not just a job. License,* Experience and tools a must. Need a self-starting individual who loves to work. Call Angelos Electric at 622-6637.

POSITION OPEN for a professional person as Sales/Marketing Representative in Roswell and in surrounding area. Sales and service experience required. Must be willing to travel. Professional appearance and attitude a must.Send resume to:
Record Reply Box 19599
Attention Sales
P.O. Box 1897
Roswell, NM 88202

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Affidavit of Publication

No. 15183

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on the same day as follows:

First Publication July 18, 1995

Second Publication

Third Publication

Fourth Publication

Gary D. Scott

Subscribed and sworn to before me this 20th day of July 19 95

Barbara Ann Beers
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of Publication

TRANSWESTERN PIPELINE COMPANY, Mr. Larry Campbell, 505-625-8022, P.O. Box 1717, Roswell, NM, 88202-1717 has submitted a Renewal discharge plan application for their Yates Plant located in the SW/4, Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. Approximately 1000 gallons per day of wastewater is stored in closed top tanks and is transferred offsite to an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 120 feet with a total dissolved solids concentration of approximately 850 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-210) - WILLIAMS

LEGAL NOTICE

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan and renewal applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131.

(GW-52)

TRANSWESTERN PIPELINE COMPANY, Mr. Larry Campbell, 505-625-8022, P.O. Box 1717, Roswell, NM, 88202-1717 has submitted a Renewal discharge plan application for their Roswell Compressor Station located in the SW/4 SW/4, Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico. Approximately 1000 gallons per day of wastewater will be transferred to an offsite livestock watering tank. The wastewater has a total dissolved solids concentration of about 1250 mg/1. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 1,551 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-53)

Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 10th day of July, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY
Director

SEAL

Published in the Artesia Daily Press, Artesia, New Mexico July 18, 1995.

Legal 15183

(GW-210) - WILLIAMS FIELD SERVICE, Ms. Leigh Gooding, 801-584-6543, P.O. Box 58900, M.S. 2G1, Salt Lake City, Utah, 84158-0900 has submitted a discharge plan application for their Hampton Straddle Compressor station located in the SW/4 SE/4, Section 11, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico. The total wastewater discharge will be about 138 gallons/day, this water will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 2,000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thrity (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be rquested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearng is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan and renewal applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-52) - TRANSWESTERN PIPELINE COMPANY, Mr. Larry Campbell, 505-625-8022, P.O. BOX 1717, Roswell, NM, 88202-1717 has submitted a Renewal discharge plan application for their Roswell Compressor Station located in the SW/4 SW/4, Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico. Approximately 1000 gallons per day of wastewater will be transferred to an offsite livestock watering tank. The wastewater has a total dissolved solids concentration of about 1250 mg/l. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 240 feet with a total dissolved solids concentration of approximately 1,551 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-53) - TRANSWESTERN PIPELINE COMPANY, Mr. Larry Campbell, 505-625-8022, P.O. BOX 1717, Roswell, NM, 88202-1717 has submitted a Renewal discharge plan application for their Yates Plant located in the SW/4, Section 25, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. Approximately 1000 gallons per day of wastewater is stored in closed top tanks and is transferred offsite to an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 120 feet with a total dissolved solids concentration of approximately 850 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-210) - WILLIAMS FIELD SERVICE, Ms. Leigh Gooding, 801-584-6543, P.O. BOX 58900, M.S. 2G1, Salt Lake City, Utah, 84158-0900 has submitted a discharge plan application for their Hampton Straddle Compressor station located in the SW/4 SE/4, Section 11, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico. The total wastewater discharge will be about 138 gallons/day, this water will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 2,000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through

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If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 10th day of July, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

Phone (505) 623-2761
FAX (505) 625-8060

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

May 08, 1995

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Renewal of Discharge Plan GW-052

Dear Mr. Anderson:

Transwestern Pipeline Company (Transwestern), owner and operator of the Roswell Compressor Station, is in receipt of the Oil Conservation Division's (OCD) March 21, 1995 letter, requesting renewal of the above referenced discharge plan. By this letter, Transwestern requests renewal of the discharge plan for the Roswell Compressor Station. Under the original application, Transwestern provided all necessary and accurate information and was issued a plan by the OCD on November 9, 1990.

During the five (5) year operating period of this approved plan, the activities at the facility which are covered under this plan have remained essentially consistent. The only information not addressed under the plan, and is presently ongoing, is a remediation activity in the northeast portion of the facility where hydrocarbon materials are being removed from the underlying groundwater. Transwestern has installed a series of monitor and production wells to address removal of the hydrocarbon constituents present. In addition, Transwestern has constructed an above ground tank for temporary storage of the liquids removed from the surface of the groundwater. Secondary containment has also been provided for this tank which complies with the regulations for SPCC. The attached diagram depicts the monitor and production well.

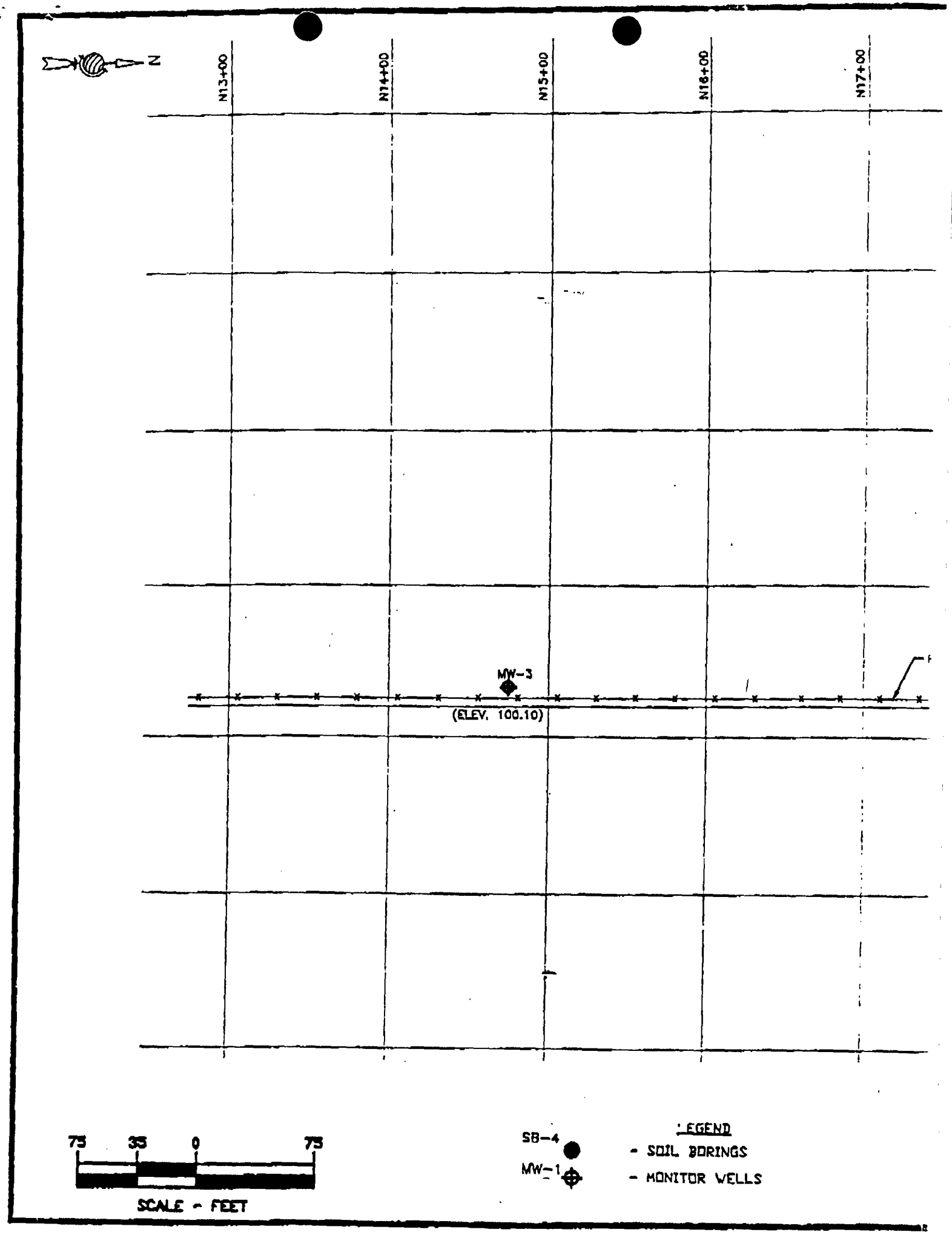
Also, as required under 3-114 of the Water Quality Control Regulations, enclosed find a $50.00 nonrefundable filing fee for this renewal application.

If you should require any additional information concerning this renewal application, contact our Roswell Technical Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist


N
N13+00
N14+00
N15+00
N16+00
N17+00
MW-3
(ELEV. 100.10)
75
35
0
75
SCALE - FEET
SB-4
MW-1
LEGEND
- SOIL BORINGS
- MONITOR WELLS

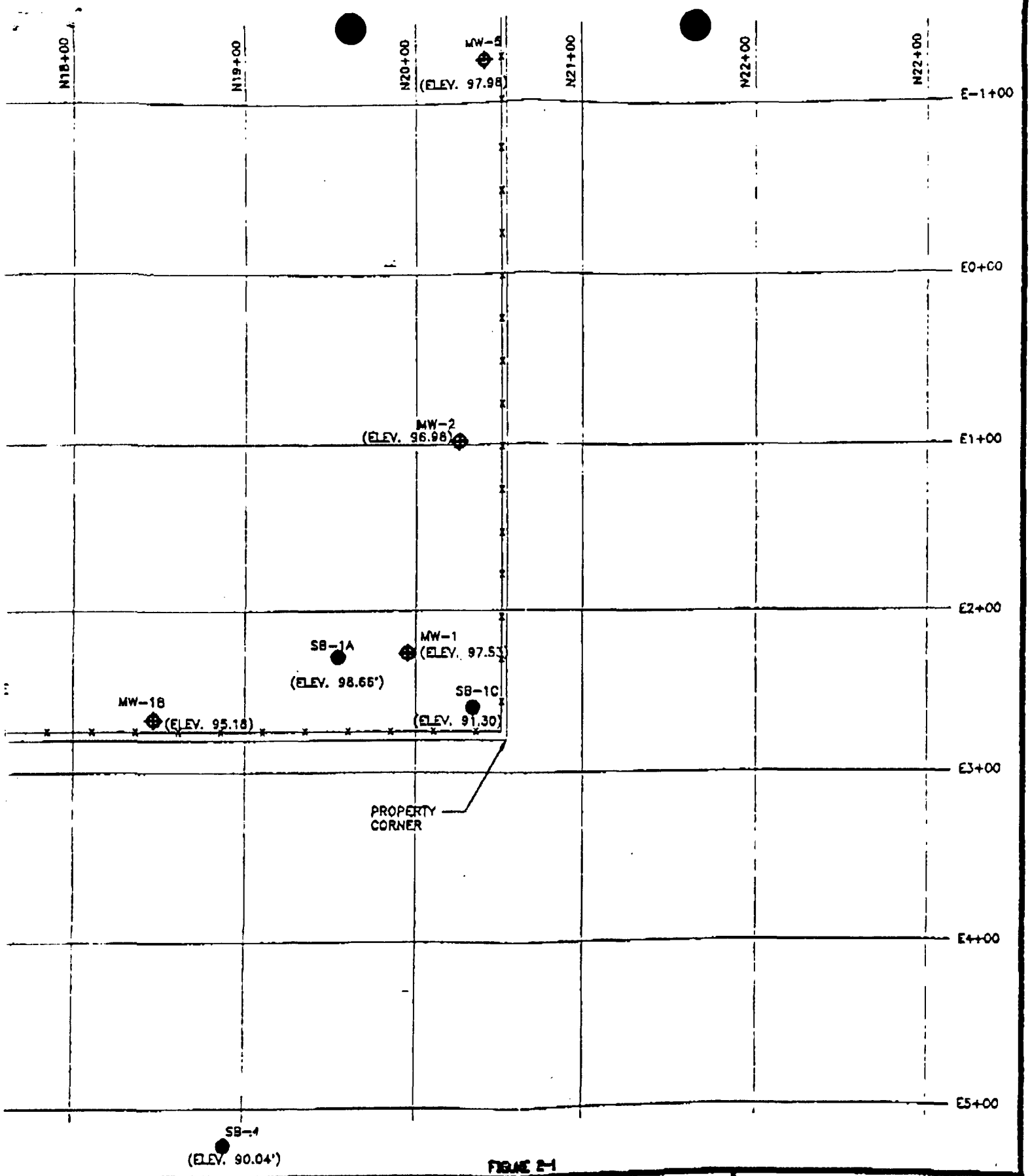


FIGURE 2-1

DRAWN BY	D.G.
DATE:	6/23/93
ENGINEER	S. RICHARD
DATE:	6/23/93
CAD DWG. NO.	TRANS1C.DWG

MONITOR WELL/BORING LOCATIONS
ROSWELL COMPRESSOR
STATION NO. 9
TRANSWESTERN PIPELINE COMPANY

SCALE: 1"=75'-0" | BRE. DWG. NO.: 5T72-BA | REV. 0

Brown & Root Environmental
A Halliburton Company

Pat

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 5/8/95,

or cash received on 5/12/95 in the amount of $ 50.00

from Transwestern Pipeline Co

for Roswell C.S. G.W.052

(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Roger Anderson Date: 5/12/95

Received in ASD by: _____ Date: _____

Filing Fee X New Facility ____ Renewal ____

Modification ____ Other _____

(specify)

Organization Code 521.07 Applicable FY 95

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

CHECK NO. [redacted]

ENRON CORP

TRANSWESTERN PIPELINE COMPANY
P. O. BOX 1188
HOUSTON, TEXAS 77251-1188

DATE MAY 8, 1995

PAY EXACTLY FIFTY DOLLARS & 00/100---------- DOLLARS $ 50.00

This check is VOID unless printed on BLUE background

PAY TO THE ORDER OF NMED WATER QUALITY MANAGEMENT

NOT VALID OVER $5,000 UNLESS COUNTERSIGNED

NORWEST BANK GRAND JUNCTION

[redacted]

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

March 21, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-651

Mr. Larry Campbell
Transwestern Pipeline Company
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: Discharge Plan GW-052 Renewal
Roswell Compressor Station
Chavez County, New Mexico

Dear Mr. Campbell:

On November 9, 1990, the groundwater discharge plan, GW-052, for the Roswell Compressor Station located in the SW/4 SW/4, Sections 21, Township 9 South, Range 24 East, NMPM, Chavez County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on November 9, 1995.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, you must renew your discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in your system, and if so, please include these modifications in your application for renewal.

To assist you in preparation of your application, I have enclosed an application form and a copy of the OCD's Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Plants and a copy of the WQCC Regulations. Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Artesia District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request.

The discharge plan renewal application for the Roswell Compressor Station is subject to the WQCC Regulations 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee for compressor stations based on the combined horsepower at the facility.

The (50) dollar filing fee is to be submitted with discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

If you no longer have any actual or potential discharges a discharge plan is not needed, please notify this office. If you have any questions regarding this matter, please do not hesitate to contact Patricio Sanchez at (505) 827-7156.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

xc: OCD Artesia Office

Z 765 962 651

Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
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P.O., State and ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, March 1993

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

November 18, 1993

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-282

Mr. Larry Campbell
Transwestern Pipeline Company
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: Discharge Plan GW-52 Modifications
Roswell Compressor Station No.9
Chaves County, New Mexico

Dear Mr. Campbell:

The Oil Conservation Division (OCD) has completed a review of Transwestern Pipeline Company's October 25, 1993 correspondence detailing modifications to the above referenced discharge plan as a part of the RCRA cleanup of contaminated ground water at the facility.

These modifications consist of the disposing of product pumped from the underlying perched zone and aquifer, an inspection schedule for the underground piping used for the product recovery and the specifics on the product recovery storage tank.

The above referenced requested modification of the previously approved discharge plan, GW-52, for the Roswell Compressor Station located in the SW/4 SW/4 of Section 25,Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico is **hereby approved.**

The discharge plan (GW-52) was originally approved on November 9, 1990. The modification does not significantly alter the discharge streams, therefore, public notice was not issued and the discharge plan fees have been waived.

The application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3-107.C and is approved pursuant to WQCC Regulation 3-109.
Please note that Section 3-104 of the WQCC regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C, you are required to notify the Director of any facility expansion, production increase or process modification that would result in a significant modification in the discharge of potential ground water contaminants.

Please be advised that OCD approval does not relieve you of liability should your operation result in actual pollution of surface waters, ground waters or the environment which may be actionable under other laws and/or regulations. In addition, this approval does not relieve you of responsibility for compliance with other city, state and federal laws and/or regulations.

If you have any questions call Chris Eustice at (505) 827-5824.

Sincerely,

for William J. LeMay.

William J. LeMay
Director

xc: OCD Artesia Office

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

May 10, 1995

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, NM 87502

RE: Transmittal of Additional Information

Dear Ms. Hoditschek,

Enclosed are Submittals 1-4 as requested by your letter dated April 28, 1995. These submittals generally comply with the specific requests for information with only a few minor exceptions which are described below.

1. The listing of hazardous constituents for waste characterization includes all constituents found in the petroleum refining category of "List 4" of the RFI Guidance with the exception of three volatile organic compounds (chloracetaldehyde, chloral, and ethanol). These three compounds cannot be analyzed by EPA Method 8240. Based on process knowledge, none of these three compounds can reasonably be considered potential contaminants of concern. Therefore, TPC has excluded these compounds from the listing of hazardous constituents for waste characterization.

2. The project schedule has been prepared as requested by the NMED with no known exceptions.

3. Tables 3-2 through 3-5 have been modified to include reference concentrations rather than "action levels" since action levels will not be developed until after waste characterization. This exception to the original request for "applicable action levels" has been discussed with Teri Davis and conditionally found acceptable pending a final review by the NMED.

4. A standard operating procedure (SOP) and QA/QC information for mobile laboratory operations was obtained from Analytical Technologies Inc. (ATI) of Phoenix, Arizona. TPC has utilized ATI's mobile lab services in the past and would likely utilize their services during soil assessment activities at the Roswell Station. However, TPC reserves the right to evaluate other mobile laboratory service providers for use at the Roswell Station. In the event another mobile laboratory service provider is selected, TPC would obtain the necessary SOP and QA/QC information and provide this to the NMED prior to field activities.

Also included with this submittal is a corrected Figure 2-1 for inclusion into the closure plan.

If you have any questions or comments regarding this information, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

gcr/BK/attachments

xc: Roger Anderson NMOCD Santa Fe, NM

ROSWELL COMPRESSOR STATION

Proposed Schedule for Closure Activities

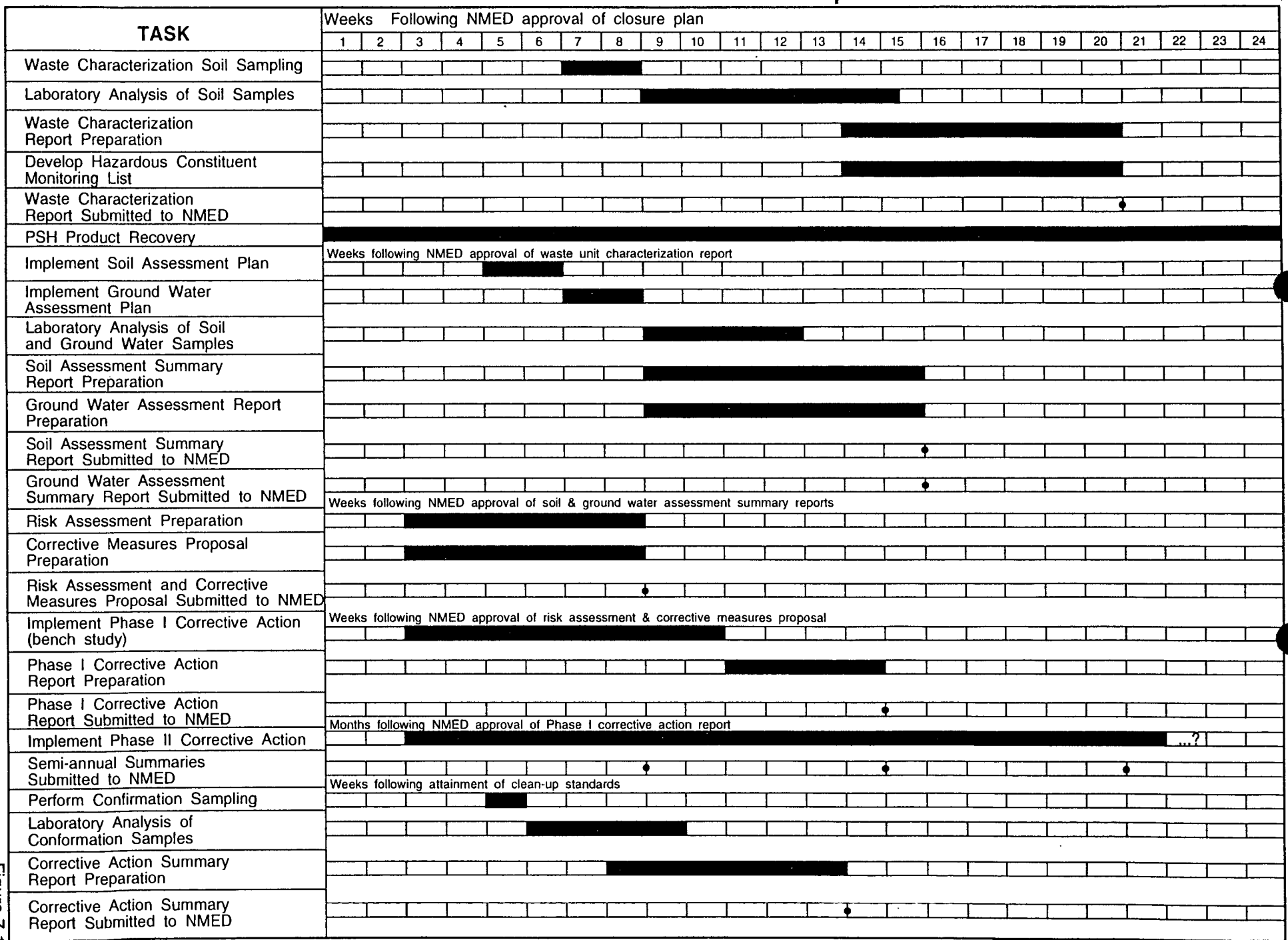

Figure 7-1

Notes: Project 4115

D4115411503F.CDR

DANIEL B. STEPHENS & ASSOCIATES, INC.

Table 3-2. Summary of Organic Compounds Detected in Soil Samples
Roswell Compressor Station No. 9
Page 1 of 8

Sample ID	Source[2]	Concentration[1]													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH
Subpart S Standard[3]		***7,000***	***70[5]***	***8,000***	***2,000***	***100***	***40[4]***	***10***	***1,000,000[5]***	***90***	***24[5]***	***20,000***	***8,000***	***200,000***	***NS***
SB9-6 @ 8-11'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20
SB9-6 @ 18-20'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20
SB9-6 @ 20-23'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	120
SB9-6 @ 26-28'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20
SB9-6 @ 26-28' Tube #5	HLA	<0.005	ND	<0.01	<0.005	ND	0.005	ND	0.006	0.016	ND	ND	<0.005	<0.005	<20
SB9-6 @ 26-28' Tube #6	HLA	<0.007	ND	<0.014	<0.007	ND	0.007	ND	0.023*	0.009*	ND	ND	<0.007	<0.007	<20
SB9-7 @ 9-12'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1100
SB9-7 @ 21.5-24'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2000
SB9-7 @ 25.5-28'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2500
SB9-7 @ 29-32'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	11000
SB9-7 @ 29-32' Tube #7	HLA	<1.3	ND	<2.6	<1.3	ND	<1.3	ND	5.1	<1.3	ND	ND	0.72	1.8	5000
SB9-7 @ 35-37'	HLA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4600
SB9-7 @ 35-37' Tube #8	HLA	<0.64	ND	<1.3	<0.64	ND	<0.64	ND	<0.64	<0.64	ND	ND	1.8	4.2	13000
SB9-7 @ 35-37' Tube #9	HLA	2	ND	<1.3	<0.67	ND	2.1	ND	<0.67	<0.67	ND	ND	2.8	6.5	30000

[1] All concentrations are in mg/kg

[2] HLA = Harding Lawson Associates (1991a)
Metric = Metric Corporation (1991)
B&R = Brown and Root Environmental (1993)

[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels

[4] Standard for 1,1,2,2 - PCA shown; standard for 1,1,1,2-PCA is 300 mg/kg

[5] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 subpart S proposed rule; reference doses from TWC Risk Reduction Rules or EPA Risk Based Concentration Table

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
PCA = Tetrachloroethane
PCE = Tetrachloroethene
Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane
TPH = Total petroleum hydrocarbons

NA = Not analyzed
ND = Not detected
NS = No standard; New Mexico OCD TPH standard for soil ranges from 100 mg/kg to 5000 mg/kg, depending on site conditions
* = Compound was also detected in the QC blanks

Note: All HLA analyses performed in on-site mobile laboratory

Table 3-2. Summary of Organic Compounds Detected in Soil Samples
Roswell Compressor Station No. 9
Page 2 of 8

Sample ID	Source[2]	Concentration[1]													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH
Subpart S Standard[3]		***7,000***	***70[5]***	***8,000***	***2,000***	***100***	***40[4]***	***10***	***1,000,000[5]***	***90***	***24[5]***	***20,000***	***8,000***	***200,000***	***NS***
P9-OS-349 @ 5'	HLA	<0.005	ND	<0.011	<0.005	ND	<0.005	ND	0.026*	0.006*	ND	ND	<0.005	<0.005	<20
P9-OS-349 @ 10'	HLA	<0.006	ND	<0.011	<0.006	ND	<0.006	ND	0.018	0.009	ND	ND	<0.006	<0.006	100
P9-OS-349 @ 20'	HLA	<0.005	ND	<0.011	<0.005	ND	<0.005	ND	0.045*	<0.005*	ND	ND	<0.005	<0.005	<20
P9-OS-349 @ 25'	HLA	<0.005	ND	<0.011	<0.005	ND	<0.005	ND	0.021	0.010	ND	ND	<0.005	<0.005	100
P9-OS-349 @ 30'	HLA	<0.007	ND	<0.014	<0.007	ND	<0.007	ND	0.045*	<0.007	ND	ND	<0.007	<0.007	<20
P9-OS-349 @ 35'	HLA	<0.007	ND	<0.014	<0.007	ND	<0.007	ND	0.039	0.015	ND	ND	<0.007	<0.007	<20
P9-OS-349 @ 40'	HLA	<0.005	ND	<0.010	<0.005	ND	<0.005	ND	0.040	0.008	ND	ND	<0.005	<0.005	<20
P9-OS-377 @ 5'	HLA	<0.006	ND	0.034*	<0.006	ND	<0.006	ND	<0.006	<0.006	ND	ND	<0.006	<0.006	200
P9-OS-377 @ 10'	HLA	<0.006	ND	0.027*	<0.006	ND	<0.006	ND	<0.006	<0.006	ND	ND	<0.006	<0.006	<20
P9-OS-377 @ 15'	HLA	<0.006	ND	0.027*	<0.006	ND	<0.006	ND	<0.006	0.011	ND	ND	<0.006	<0.006	<20
P9-OS-377 @ 20'	HLA	<0.007	ND	0.037*	<0.007	ND	<0.007	ND	<0.007	0.007	ND	ND	<0.007	<0.007	<20
P9-OS-377 @ 25'	HLA	<0.006	ND	<0.012	<0.006	ND	<0.006	ND	0.046	0.036	ND	ND	<0.006	<0.006	<20
P9-OS-377 @ 30'	HLA	<0.007	ND	<0.013	<0.007	ND	<0.007	ND	0.069	0.023	ND	ND	<0.007	<0.007	<20

[1] All concentrations are in mg/kg
[2] HLA = Harding Lawson Associates (1991a)
Metric = Metric Corporation (1991)
B&R = Brown and Root Environmental (1993)
[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels
[4] Standard for 1,1,2,2 - PCA shown; standard for 1,1,1,2-PCA is 300 mg/kg
[5] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 subpart S proposed rule; reference doses from TWC Risk Reduction Rules or EPA Risk Based Concentration Table

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
PCA = Tetrachloroethane
PCE = Tetrachloroethene
Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane
TPH = Total petroleum hydrocarbons

NA = Not analyzed
ND = Not detected
NS = No standard; New Mexico OCD TPH standard for soil ranges from 100 mg/kg to 5000 mg/kg, depending on site conditions
* = Compound was also detected in the QC blanks

Note: All HLA analyses performed in on-site mobile laboratory

Table 3-2. Summary of Organic Compounds Detected in Soil Samples
Roswell Compressor Station No. 9
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Sample ID	Source[2]	Concentration[1]													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH
Subpart S Standard[3]		***7,000***	***70[5]***	***8,000***	***2,000***	***100***	***40[4]***	***10***	***1,000,000[5]***	***90***	***24[5]***	***20,000***	***8,000***	***200,000***	***NS***
Pit 1 @ 2.8-3.0'	Metric	3.2	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	25000
Pit 1 @ 9.2-9.4'	Metric	19	ND	NA	ND	ND	ND	0.26	NA	ND	NA	NA	NA	NA	39000
Pit 1 @ 13.5-13.7'	Metric	18	0.59	NA	ND	0.20	ND	0.33	NA	ND	NA	NA	NA	NA	55000
Pit 1 @ 18.8-19.0'	Metric	0.33	ND	NA	ND	ND	ND	0.87	NA	ND	NA	NA	NA	NA	20000
Pit 1 @ 26.8-27.0'	Metric	ND	ND	NA	ND	ND	ND	0.16	NA	ND	NA	NA	NA	NA	11000
Pit 1 @ 30.6-30.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
Pit 1 @ 41.6-41.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	16
Pit 1 @ 43.5-43.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	56
Pit 2 #1 @ 18.7-18.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
Pit 2 #2 @ 18.7-18.9'	Metric	0.37	ND	NA	ND	ND	ND	0.65	NA	ND	NA	NA	NA	NA	13000
Pit 2 @ 26.0-26.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	170
Pit 2 @ 29.1-29.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
Pit 2 @ 39.8-39.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	2600
Pit 2 @ 44.1-44.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	44

[1] All concentrations are in mg/kg
[2] HLA = Harding Lawson Associates (1991a)
Metric = Metric Corporation (1991)
B&R = Brown and Root Environmental (1993)
[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels
[4] Standard for 1,1,2,2 - PCA shown; standard for 1,1,1,2-PCA is 300 mg/kg
[5] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 subpart S proposed rule; reference doses from TWC Risk Reduction Rules or EPA Risk Based Concentration Table

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
PCA = Tetrachloroethane
PCE = Tetrachloroethene
Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane
TPH = Total petroleum hydrocarbons

NA = Not analyzed
ND = Not detected
NS = No standard; New Mexico OCD TPH standard for soil ranges from 100 mg/kg to 5000 mg/kg, depending on site conditions
* = Compound was also detected in the QC blanks

Note: All HLA analyses performed in on-site mobile laboratory

Table 3-2. Summary of Organic Compounds Detected in Soil Samples
Roswell Compressor Station No. 9
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Sample ID	Source[2]	Concentration[1]													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH
Subpart S Standard[3]		***7,000***	***70[5]***	***8,000***	***2,000***	***100***	***40[4]***	***10***	***1,000,000[5]***	***90***	***24[5]***	***20,000***	***8,000***	***200,000***	***NS***
Pit 2 @ 57.5-57.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	250
Pit 2 @ 69.9-70.1'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
Pit 3 BH-1 @ 30.7-30.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
Pit 3 BH-2 @ 25.0-25.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
SG 86 @ 13.5-13.7'	Metric	0.24	ND	NA	ND	ND	ND	1.9	NA	ND	NA	NA	NA	NA	18000
SG 86 @ 18.7-18.9'	Metric	ND	ND	NA	ND	ND	ND	0.23	NA	ND	NA	NA	NA	NA	5200
SG 86 @ 24.9-25.1'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 86 @ 35.0-35.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	8.0
SG 86 @ 40.5-40.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
SG 91 @ 28.6-28.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
SG 349 @ 0.0-1.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 349 @ 2.9-4.6'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 349 @ 9.0-10.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 349 @ 14.0-14.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND

[1] All concentrations are in mg/kg
[2] HLA = Harding Lawson Associates (1991a)
Metric = Metric Corporation (1991)
B&R = Brown and Root Environmental (1993)
[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels
[4] Standard for 1,1,2,2 - PCA shown; standard for 1,1,1,2-PCA is 300 mg/kg
[5] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 subpart S proposed rule; reference doses from TWC Risk Reduction Rules or EPA Risk Based Concentration Table

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
PCA = Tetrachloroethane
PCE = Tetrachloroethene
Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane
TPH = Total petroleum hydrocarbons

NA = Not analyzed
ND = Not detected
NS = No standard; New Mexico OCD TPH standard for soil ranges from 100 mg/kg to 5000 mg/kg, depending on site conditions
* = Compound was also detected in the QC blanks

Note: All HLA analyses performed in on-site mobile laboratory

Table 3-2. Summary of Organic Compounds Detected in Soil Samples
Roswell Compressor Station No. 9
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Sample ID	Source[2]	Concentration[1]													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH
Subpart S Standard[3]		***7,000***	***70[5]***	***8,000***	***2,000***	***100***	***40[4]***	***10***	***1,000,000[5]***	***90***	***24[5]***	***20,000***	***8,000***	***200,000***	***NS***
SG 349 @ 20.3-21.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 349 @ 5.3-26.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 349 @ 29.7-30.4'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
SG 360 @ 0.0-2.5'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 4.0-5.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 9.0-9.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 14.0-14.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 19.0-20.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 24.0-25.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 360 @ 29.0-29.4'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	2.0
SG 361 @ 0.0-2.5'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 361 @ 4.0-5.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 361 @ 9.0-10.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 361 @ 16.0-16.4'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND

[1] All concentrations are in mg/kg
[2] HLA = Harding Lawson Associates (1991a)
Metric = Metric Corporation (1991)
B&R = Brown and Root Environmental (1993)
[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels
[4] Standard for 1,1,2,2 - PCA shown; standard for 1,1,1,2-PCA is 300 mg/kg
[5] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 subpart S proposed rule; reference doses from TWC Risk Reduction Rules or EPA Risk Based Concentration Table

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
PCA = Tetrachloroethane
PCE = Tetrachloroethene
Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane
TPH = Total petroleum hydrocarbons

NA = Not analyzed
ND = Not detected
NS = No standard; New Mexico OCD TPH standard for soil ranges from 100 mg/kg to 5000 mg/kg, depending on site conditions
* = Compound was also detected in the QC blanks

Note: All HLA analyses performed in on-site mobile laboratory

Table 3-2. Summary of Organic Compounds Detected in Soil Samples
Roswell Compressor Station No. 9
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Sample ID	Source[2]	Concentration[1]													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH
Subpart S Standard[3]		***7,000***	***70[5]***	***8,000***	***2,000***	***100***	***40[4]***	***10***	***1,000,000[5]***	***90***	***24[5]***	***20,000***	***8,000***	***200,000***	***NS***
SG 361 @ 19.5-19.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 361 @ 24.0-25.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
SG 361 @ 38.0-39.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-1 @ 18.9-19.1'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	12
OS BH-1 @ 34.3-34.5'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-2 @ 9.9-10.1'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-2 @ 22.5-22.6'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-2 @ 31.1-31.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	68
OS BH-2 @ 41.8-42.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	24
OS BH-2 @ 55.2-55.4'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
OS BH-2 @ 69.0-69.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
OS BH-3 @ 21.0-21.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
OS BH-3 @ 44.1-44.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
OS BH-3 @ 54.7-55.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	16

[1] All concentrations are in mg/kg
[2] HLA = Harding Lawson Associates (1991a)
Metric = Metric Corporation (1991)
B&R = Brown and Root Environmental (1993)
[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels
[4] Standard for 1,1,2,2 - PCA shown; standard for 1,1,1,2-PCA is 300 mg/kg
[5] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 subpart S proposed rule; reference doses from TWC Risk Reduction Rules or EPA Risk Based Concentration Table

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
PCA = Tetrachloroethane
PCE = Tetrachloroethene
Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane
TPH = Total petroleum hydrocarbons

NA = Not analyzed
ND = Not detected
NS = No standard; New Mexico OCD TPH standard for soil ranges from 100 mg/kg to 5000 mg/kg, depending on site conditions
* = Compound was also detected in the QC blanks

Note: All HLA analyses performed in on-site mobile laboratory

Table 3-2. Summary of Organic Compounds Detected in Soil Samples
Roswell Compressor Station No. 9
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Sample ID	Source[2]	Concentration[1]													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH
Subpart S Standard[3]		***7,000***	***70[6]***	***8,000***	***2,000***	***100***	***40[4]***	***10***	***1,000,000[5]***	***90***	***24[6]***	***20,000***	***8,000***	***200,000***	***NS***
OS BH-4 @ 27.5-27.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
OS BH-5 @ 14.0-14.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-5 @ 19.6-19.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	16
OS BH-5 @ 23.4-23.6'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	12
OS BH-6 @ 13.6-13.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	12
OS BH-6 @ 47.0-47.2'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-6 @ 52.6-52.8'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-6 @ 70.0-71.0'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
OS BH-7 @ 22.1-22.3'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	ND
OS BH-7 @ 33.5-33.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	ND
OS BH-7 @ 37.0-37.2'	Metric	ND	ND	NA	ND	ND	ND	0.17	NA	ND	ND	ND	0.19	0.44	12
OS BH-8 @ 4.6-4.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	12
OS BH-8 @ 33.9-34.1'	Metric	ND	ND	NA	0.12	ND	ND	0.16	NA	ND	NA	NA	NA	NA	ND
OS BH-8 @ 49.7-49.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	0.14	0.3	12

[1] All concentrations are in mg/kg
[2] HLA = Harding Lawson Associates (1991a)
Metric = Metric Corporation (1991)
B&R = Brown and Root Environmental (1993)
[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels
[4] Standard for 1,1,2,2 - PCA shown; standard for 1,1,1,2-PCA is 300 mg/kg
[5] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 subpart S proposed rule; reference doses from TWC Risk Reduction Rules or EPA Risk Based Concentration Table

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
PCA = Tetrachloroethane
PCE = Tetrachloroethene
Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane
TPH = Total petroleum hydrocarbons

NA = Not analyzed
ND = Not detected
NS = No standard; New Mexico OCD TPH standard for soil ranges from 100 mg/kg to 5000 mg/kg, depending on site conditions
* = Compound was also detected in the QC blanks

Note: All HLA analyses performed in on-site mobile laboratory

Table 3-2. Summary of Organic Compounds Detected in Soil Samples
Roswell Compressor Station No. 9

Sample ID	Source[2]	Concentration[1]													
		1,1,1-TCA	1,1-DCA	Acetone	Chloro-benzene	Chloro-form	PCA	PCE	Freon-113	Methylene chloride	Benzene	Toluene	Ethyl-benzene	Total Xylenes	TPH
Subpart S Standard[3]		***7,000***	***70[5]***	***8,000***	***2,000***	***100***	***40[4]***	***10***	***1,000,000[5]***	***90***	***24[5]***	***20,000***	***8,000***	***200,000***	***NS***
OS BH-9 @ 4.5-4.9'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	8
OS BH-9 @ 32.0-32.5'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	NA	NA	NA	NA	150
OS BH-9 @ 49.5-49.7'	Metric	ND	ND	NA	ND	ND	ND	ND	NA	ND	ND	ND	ND	ND	8
BH-10 @ 37.3-37.6'	Metric	NA	NA	NA	ND	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
BH-11 @ 36.3-36.7'	Metric	NA	NA	NA	ND	NA	NA	NA	NA	NA	ND	ND	ND	ND	8
SB-1C @ 25-26'	B&R	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20
SB-5 @ 19-21'	B&R	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20
SB-5 @ 64-66'	B&R	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<20

[1] All concentrations are in mg/kg
[2] HLA = Harding Lawson Associates (1991a)
Metric = Metric Corporation (1991)
B&R = Brown and Root Environmental (1993)
[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels
[4] Standard for 1,1,2,2 - PCA shown; standard for 1,1,1,2-PCA is 300 mg/kg
[5] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 subpart S proposed rule; reference doses from TWC Risk Reduction Rules or EPA Risk Based Concentration Table

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
PCA = Tetrachloroethane
PCE = Tetrachloroethene
Freon-113 = 1,1,2-Trichloro-1,2,2-trifluoroethane
TPH = Total petroleum hydrocarbons

NA = Not analyzed
ND = Not detected
NS = No standard; New Mexico OCD TPH standard for soil ranges from 100 mg/kg to 5000 mg/kg, depending on site conditions
* = Compound was also detected in the QC blanks

Note: All HLA analyses performed in on-site mobile laboratory

Table 3-3. Summary of TCLP Inorganic Constituents Detected in Soil Samples
Roswell Compressor Station No. 9
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Sample ID	Source[1]	Concentration (mg/L)							
		Arsenic (TCLP Extract)	Barium (TCLP Extract)	Cadmium (TCLP Extract)	Chromium (TCLP Extract)	Lead (TCLP Extract)	Mercury (TCLP Extract)	Selenium (TCLP Extract)	Silver (TCLP Extract)
TCLP Limit[2]	—	***5.0***	***100.0***	***1.0***	***5.0***	***5.0***	***0.2***	***1.0***	***5.0***
SB9-6 @ 8-11'	HLA	0.004	0.63	0.0010	<0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-6 @ 18-20'	HLA	<0.003	1.21	<0.0005	<0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-6 @ 20-23'	HLA	<0.003	0.7	<0.0005	0.011	<0.002	<0.0002	<0.003	0.0026
SB9-6 @ 26-28'	HLA	<0.003	1.22	0.0006	0.006	0.008	<0.0002	<0.003	<0.0005
SB9-6 @ 26-28' Tube #5	HLA	<0.003	1.3	0.0012	0.007	0.002	<0.0002	<0.003	<0.0005
SB9-6 @ 26-28' Tube #6	HLA	0.009	0.010	0.0008	0.011	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 9-12'	HLA	<0.003	0.75	0.0005	0.007	0.003	<0.0002	<0.003	<0.0005
SB9-7 @ 21.5-24'	HLA	0.004	2.22	0.0010	<0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 25.5-28'	HLA	<0.003	1.81	<0.0005	0.009	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 29-32'	HLA	0.008	3.59	0.0011	0.009	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 29-32' Tube #7	HLA	0.008	1.81	0.0012	0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 35-37'	HLA	0.008	1.72	0.0007	0.007	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 35-37' Tube #8	HLA	0.005	1.84	0.0006	<0.006	<0.002	<0.0002	<0.003	<0.0005
SB9-7 @ 35-37' Tube #9	HLA	0.004	3.12	0.0006	0.01	<0.002	<0.0002	<0.003	<0.0005
P9-OS-349 @ 5'	HLA	0.007	1.21	0.0009	0.012	0.012	<0.0002	<0.003	<0.0006
P9-OS-349 @ 10'	HLA	0.005	0.4	<0.0006	0.013	0.011	<0.0002	<0.01	<0.0006

[1] HLA = Harding Lawson Associates (1991a)
[2] TCLP limits provided for reference only and should not be construed as proposed action levels

Table 3-3. Summary of TCLP Inorganic Constituents Detected in Soil Samples
Roswell Compressor Station No. 9
Page 2 of 2

Sample ID	Source[1]	Concentration (mg/L)							
		Arsenic (TCLP Extract)	Barium (TCLP Extract)	Cadmium (TCLP Extract)	Chromium (TCLP Extract)	Lead (TCLP Extract)	Mercury (TCLP Extract)	Selenium (TCLP Extract)	Silver (TCLP Extract)
TCLP Limit[2]	---	***5.0***	***100.0***	***1.0***	***5.0***	***5.0***	***0.2***	***1.0***	***5.0***
P9-OS-349 @ 20'	HLA	<0.003	0.77	<0.0006	0.009	0.004	<0.0002	<0.003	<0.0006
P9-OS-349 @ 30'	HLA	<0.003	1.48	<0.0006	0.009	0.007	<0.0002	<0.003	<0.0006
P9-OS-349 @ 35'	HLA	<0.003	1.36	<0.0006	0.011	0.005	<0.0002	<0.003	<0.0006
P9-OS-349 @ 40'	HLA	0.005	0.23	0.0013	<0.007	<0.002	<0.0002	<0.003	<0.0006
P9-OS-377 @ 5'	HLA	0.004	1.05	<0.0006	0.009	0.003	<0.0002	<0.003	<0.0006
P9-OS-377 @ 10'	HLA	0.01	0.19	0.0018	0.007	0.004	<0.0002	<0.01	<0.0006
P9-OS-377 @ 15'	HLA	<0.003	0.15	0.003	0.011	0.009	<0.0002	<0.003	<0.0006
P9-OS-377 @ 20'	HLA	0.003	0.16	0.0010	0.011	0.003	<0.0002	<0.01	<0.0006
P9-OS-377 @ 25'	HLA	0.006	0.06	0.0009	<0.007	<0.002	<0.0002	<0.02	<0.0006
P9-OS-377 @ 30'	HLA	0.011	0.32	<0.0006	<0.007	<0.002	<0.0002	<0.003	<0.0006

[1] HLA = Harding Lawson Associates (1991a)
[2] TCLP limits provided for reference only and should not be construed as proposed action levels

Table 3-4. Summary of Organic Compounds Detected in Ground-Water Samples Roswell Compressor Station No. 9

Sample ID	Source[2]	Date	Concentration[1]												
			Benzene	Toluene	Ethyl-benzene	o-Xylene	p-Xylene, m-Xylene	1,1,1-TCA	1,1-DCA	2-Butanone (MEK)	Naphthalene	2-Methyl-naphthalene	4-Methyl-phenol	Petroleum Hydrocarbons (mg/L)
NM Ground-Water Standard[3]			***10***	***750***	***750***	***620[4]***		***60***	***NS***	***NS***	***NS***	***30[5]***	***NS***	***NS***
Subpart S standard[6]			***5***	***10,000***	***4,000***	***70,000[4]***		***3,000***	***3,500[7]***	***2,000***	***140[7]***	***NS***	***2,000***	***NS***
EPA MCL[8]			***5***	***1,000***	***700***	***10,000[4]***		***200***	***NS***	***NS***	***NS***	***NS***	***NS***	***NS***
MW-1	HB	09/21/92	370	61	110	120	820	180	560	220	34	51	250	37
MW-2	B&R	10/09/93	6,500	15,000	2,100	13,000[4]		<300	<300	NA	NA	NA	NA	NA
MW-3	B&R	04/30/93	<5	<5	<5	NA	NA	<5	<5	NA	NA	NA	NA	<0.2
MW-5	B&R	04/30/93	<5	<5	<5	NA	NA	<5	<5	NA	NA	NA	NA	<0.2
MW-6	DBS&A	12/02/94	<0.5	<0.5	<0.5	<0.5[4]		<0.2	<0.2	NA	NA	NA	NA	<2.5
TW-1	DBS&A	12/22/94	<1	<5	<5	<5		<5	<5	<100	<10	<10	<10	NA
Well #5[9]	DBS&A	12/22/94	<1	<5	<5	<5		<5	<5	<100	NA	NA	NA	NA

[1] Concentrations are in µg/L unless otherwise noted
[2] HB = Halliburton NUS Environmental Corp. (1992)
B&R = Brown and Root Environmental (1993)
DBS&A = Daniel B. Stephens & Associates, Inc. (1994)
[3] New Mexico Ground Water Standards - New Mexico Environment Department, Ground Water Protection and Remediation Bureau; standards are provided for reference only and should not be construed as proposed action levels
[4] Total xylenes
[5] Sum of naphthalene and methylnaphthalene
[6] RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels
[7] Calculated using methodology in Appendix D - RCRA 40 CFR Part 264 Subpart S proposed rule; reference doses obtained from TWC Risk Reduction Rules, EPA Risk Based Concentration Tables, or Safe Drinking Water Hotline
[8] EPA Drinking Water maximum concentration levels (MCL); standards are provided for reference only and should not construed as proposed action levels
[9] Off-site water supply well; see Figure 2-5 for location

1,1,1-TCA = 1,1,1-Trichloroethane
1,1-DCA = 1,1-Dichloroethane
MEK = Methyl ethyl ketone
NA = Not analyzed
ND = Not detected
NS = No standard

Table 3-5. Summary of Inorganic Constituents Detected in Ground-Water Samples Roswell Compressor Station No. 9

Sample ID	Source[1]	Date	Concentration (mg/L)																
			Arsenic		Barium		Cadmium		Chromium		Lead		Mercury		Selenium		Silver		
			T	D	T	D	T	D	T	D	T	D	T	D	T	D	T	D	TDS
NM Ground-Water Standards[2]			***NS***	***0.1***	***NS***	***1.0***	***NS***	***0.01***	***NS***	***0.05***	***NS***	***0.05***	***0.002***	***NS***	***NS***	***0.05***	***NS***	***0.05***	***1000***
Subpart S standard[3]			***0.05***	***NS***	***2.0***	***NS***	***0.05***	***NS***	***0.1***	***NS***	***0.015***	***NS***	***0.002***	***NS***	***0.05***	***NS***	***0.1***	***NS***	***NS***
EPA MCL[4]			***0.05***	***NS***	***2.0***	***NS***	***0.05***	***NS***	***0.1***	***NS***	***0.015***	***NS***	***0.002***	***NS***	***0.05***	***NS***	***0.1***	***NS***	***NS***
MW-1	HB	09/21/92	0.19[6]	NA	4.4[6]	NA	<0.005	NA	0.01	NA	<0.05	NA	<0.0002	NA	<0.003	NA	<0.01	NA	NA
MW-3	B&R	04/30/93	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3,400
	CES	03/23/94	<0.03	<0.03	0.09	0.02	<0.01	<0.01	<0.01	<0.01	0.04	<0.03	<0.0002	<0.0002	<0.04	<0.04	<0.01	<0.01	NA
MW-5	B&R	04/30/93	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3,800
	CES	03/23/94	<0.03	<0.03	0.38	0.01	<0.01	<0.01	0.03	<0.01	0.04	<0.03	<0.0002	<0.0002	<0.04	<0.04	<0.01	<0.01	NA
TW-1	DBS&A	12/22/94	<0.05	NA	0.14	NA	<0.005	NA	<0.01	NA	0.06	NA	<0.0002	NA	<0.1	NA	<0.01	NA	1,290
Well #5[5]	DBS&A	12/22/94	<0.05	NA	0.02	NA	<0.005	NA	<0.01	NA	<0.05	NA	<0.0002	NA	<0.1	NA	<0.01	NA	2,420

[1] HB = Halliburton NUS Environmental Corp. (1992)
B&R = Brown and Root Environmental (1993)
CES = Cypress Engineering Services (1994)
DBS&A = Daniel B. Stephens & Associates, Inc. (1994)

[2] New Mexico Ground Water Standards - New Mexico Environment Department, Ground Water Protection and Remediation Bureau; standards are provided for reference only and should not be construed as proposed action levels

[3] Proposed RCRA 40 CFR Part 264 Subpart S Appendix A - standards are provided for reference only and should not be construed as proposed action levels

[4] EPA Drinking Water maximum contaminant levels (MCL); standards are provided for reference only and should not be construed as proposed action levels

[5] Off-site water supply well; see Figure 2-5 for location

[6] Unfiltered ground-water sample was turbid; concentration includes suspended sediment

TDS = Total dissolved solids
T = Total metals concentrations determined on unfiltered samples
D = Dissolved metals concentrations determined on samples filtered in the laboratory prior to analysis
NA = Not analyzed
NS = Not standard

Note: New Mexico Water Quality Control Commission (NMWQCC) ground-water standards pertain to dissolved constituents, except mercury; the mercury standard applies to the total (unfiltered) mercury concentration.

Table 6-1b. Analyte List for Waste Characterization

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
Volatile Organic Compounds						
Acetone	3520(L)/3550(S)	8240	2-14	324		
Acetonitrile	3520(L)/3550(S)	8240[e]	2-13	324		
Acrolein (Propenal)	3520(L)/3550(S)	8240[e]	2-13, 2-14	324		
Acrylonitrile	3520(L)/3550(S)	8240	2-13, 2-14	324		
Allyl chloride	3520(L)/3550(S)	8240		324		
Benzene	3520(L)/3550(S)	8240	2-12,2-14	324	X	X
Benzyl chloride	3520(L)/3550(S)	8240	2-10			
Bromobenzene	3520(L)/3550(S)	8240	2-10			
Bromochloromethane	3520(L)/3550(S)	8240[f]	2-14			
Bromodichloromethane	3520(L)/3550(S)	8240	2-10,2-14	325		
4-Bromofluorobenzene	3520(L)/3550(S)	8240[g]	2-14			
Bromoform (tribromomethane)	3520(L)/3550(S)	8240	2-10,2-14	325		
Bromomethane	3520(L)/3550(S)	8240	2-10,2-14	328		
2-Butanone (MEK)	3520(L)/3550(S)	8240	2-14	328	X	X
Carbon disulfide	3520(L)/3550(S)	8240	2-14	325		
Carbon tetrachloride	3520(L)/3550(S)	8240	2-10,2-14	325	X	X
Chloracetaldehyde	3520(L)/3550(S)	[h]	2-10			
Chloral (trichloroacetaldehyde)	3520(L)/3550(S)	[h]	2-10			

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

[a] SW 846 Test Methods for Evaluating Solid Waste, Revision 2, September 1994
[b] Interim Final RCRA Facility Investigation Guidance, Volume I of IV, Appendix B - Monitoring Constituents and Indicator Parameters, List 4 - Industry-Specific Monitoring Constituents, Table 2-X or List 1 - Indicator Parameters
[c] 40 CFR, Part 264, Appendix IX, Ground-Water Monitoring List, July 1, 1992 edition, page number listed
[d] These compounds are potential constituents of concern based on Enron's experience at similar gas transmission facilities
[e] Compound not on 1994 8240 list, but can be quantified by this method
[f] Compound used as internal standard
[g] Compound used as surrogate
[h] Constituent is not a contaminant of concern and cannot be analyzed by method 8240, so it will not be included on the target analyte list

Table 6-1b. Analyte List for Waste Characterization
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Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
Chlorobenzene	3520(L)/3550(S)	8240	2-10,2-12,2-14	325		X
Chloroethane	3520(L)/3550(S)	8240	2-10,2-14	325		X
2-Chloroethyl vinyl ether	3520(L)/3550(S)	8240	2-10,2-14			
Chloroform (trichloromethane)	3520(L)/3550(S)	8240	2-10,2-14	325		X
1-Chlorohexane	3520(L)/3550(S)	8240[e]	2-10			
Chloromethane (methyl chloride)	3520(L)/3550(S)	8240	2-10,2-14	328		X
Chloromethyl methyl ether (CMME)	3520(L)/3550(S)	8240[e]	2-10			
Chloroprene	3520(L)/3550(S)	8240		325		
Dibromochloromethane (chlorodibromomethane)	3520(L)/3550(S)	8240	2-10	325		
1,2-Dibromo-3-chloropropane (DBCP)	3520(L)/3550(S)	8240		325		
1,2-Dibromoethane (ethylene dibromide)	3520(L)/3550(S)	8240		326		
Dibromomethane (methylene bromide)	3520(L)/3550(S)	8240	2-10,2-14	328		
1,4-Dichloro-2-butene	3520(L)/3550(S)	8240		326		
Dichlorodifluoromethane (Freon 12)	3520(L)/3550(S)	8240	2-10,2-14	326		
1,1-Dichloroethane (1,1-DCA)	3520(L)/3550(S)	8240	2-10,2-14	326	X	X
1,2-Dichloroethane (ethylene chloride)	3520(L)/3550(S)	8240	2-10,2-14	326		X
1,1-Dichloroethylene (vinylidene chloride)	3520(L)/3550(S)	8240	2-10,2-14	326		X
cis-1,2-dichloroethene	3520(L)/3550(S)	8240	2-10,2-14	326		X
trans-1,2-Dichloroethylene	3520(L)/3550(S)	8240	2-10,2-14	326		X

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

[a] SW 846 Test Methods for Evaluating Solid Waste, Revision 2, September 1994
[b] Interim Final RCRA Facility Investigation Guidance, Volume I of IV, Appendix B - Monitoring Constituents and Indicator Parameters, List 4 - Industry-Specific Monitoring Constituents, Table 2-X or List 1 - Indicator Parameters
[c] 40 CFR, Part 264, Appendix IX, Ground-Water Monitoring List, July 1, 1992 edition, page number listed
[d] These compounds are potential constituents of concern based on Enron's experience at similar gas transmission facilities
[e] Compound not on 1994 8240 list, but can be quantified by this method
[f] Compound used as internal standard
[g] Compound used as surrogate
[h] Constituent is not a contaminant of concern and cannot be analyzed by method 8240, so it will not be included on the target analyte list

Table 6-1b. Analyte List for Waste Characterization
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Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
1,2-Dichloropropane (propylene chloride)	3520(L)/3550(S)	8240	2-10	326		
cis-1,3-Dichloropropylene	3520(L)/3550(S)	8240	2-14	326		
trans-1,3-Dichloropropylene	3520(L)/3550(S)	8240	2-14	326		
1,4-Difluorobenzene	3520(L)/3550(S)	8240[g]	2-14			
Ethanol	3520(L)/3550(S)	[h]	2-14			
Ethylbenzene	3520(L)/3550(S)	8240	2-12,2-14	327	X	X
Ethyl methacrylate	3520(L)/3550(S)	8240	2-14	327		
2-Hexanone	3520(L)/3550(S)	8240	2-14	327		
Iodomethane	3520(L)/3550(S)	8240	2-14			
Isobutyl alcohol	3520(L)/3550(S)	8240		327		
Methacrylonitrile	3520(L)/3550(S)	8240		327		
Methylene chloride (dichloromethane)	3520(L)/3550(S)	8240	2-14	328		X
Methyl iodide	3520(L)/3550(S)	8240		328		
Methyl methacrylate	3520(L)/3550(S)	8240	2-6	328		
4-Methyl-2-pentanone (MIBK)	3520(L)/3550(S)	8240	2-14	328		
Pentachloroethane	3520(L)/3550(S)	8240		328		
Propionitrile	3520(L)/3550(S)	8240		329		
Styrene	3520(L)/3550(S)	8240	2-14	329		
1,1,1,2-Tetrachloroethane (1,1,1,2-PCA)	3520(L)/3550(S)	8240	2-10	329	X	X

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

[a] SW 846 Test Methods for Evaluating Solid Waste, Revision 2, September 1994
[b] Interim Final RCRA Facility Investigation Guidance, Volume I of IV, Appendix B - Monitoring Constituents and Indicator Parameters, List 4 - Industry-Specific Monitoring Constituents, Table 2-X or List 1 - Indicator Parameters
[c] 40 CFR, Part 264, Appendix IX, Ground-Water Monitoring List, July 1, 1992 edition, page number listed
[d] These compounds are potential constituents of concern based on Enron's experience at similar gas transmission facilities
[e] Compound not on 1994 8240 list, but can be quantified by this method
[f] Compound used as internal standard
[g] Compound used as surrogate
[h] Constituent is not a contaminant of concern and cannot be analyzed by method 8240, so it will not be included on the target analyte list

Table 6-1b. Analyte List for Waste Characterization
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Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
1,1,2,2-Tetrachloroethane (1,1,2,2-PCA)	3520(L)/3550(S)	8240	2-10,2-14	329	X	X
Tetrachloroethylene (PCE)	3520(L)/3550(S)	8240	2-10	329	X	X
Toluene	3520(L)/3550(S)	8240	2-12,2-14	329	X	X
1,1,1-Trichloroethane (1,1,1-TCA)	3520(L)/3550(S)	8240	2-10,2-14	329	X	X
1,1,2-Trichloroethane	3520(L)/3550(S)	8240	2-10,2-14	329	X	X
Trichloroethylene (TCE)	3520(L)/3550(S)	8240	2-10,2-14	329	X	X
Trichlorofluoromethane (Freon 11)	3520(L)/3550(S)	8240[e]	2-10,2-14	329		
1,2,3-Trichloropropane	3520(L)/3550(S)	8240	2-14	329		
Vinyl acetate	3520(L)/3550(S)	8240	2-14	329		
Vinyl chloride	3520(L)/3550(S)	8240	2-10,2-14	330		X
Xylene(s)	3520(L)/3550(S)	8240	2-12,2-14	330	X	X

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

[a] SW 846 Test Methods for Evaluating Solid Waste, Revision 2, September 1994
[b] Interim Final RCRA Facility Investigation Guidance, Volume I of IV, Appendix B - Monitoring Constituents and Indicator Parameters, List 4 - Industry-Specific Monitoring Constituents, Table 2-X or List 1 - Indicator Parameters
[c] 40 CFR, Part 264, Appendix IX, Ground-Water Monitoring List, July 1, 1992 edition, page number listed
[d] Compound not on 1994 8240 list, but can be quantified by this method
[e] Compound used as internal standard
[f] Compound used as surrogate

Table 6-1b. Analyte List for Waste Characterization
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Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
Semivolatile Organic Compounds						
Acenaphthene	3520(L)/3550(S)	8270	2-4,2-6	324	X	X
Acenaphthylene	3520(L)/3550(S)	8270	2-4,2-6	324		
Acetophenone (methyl phenyl ketone)	3520(L)/3550(S)	8270	2-6	324		
4-Aminobiphenyl	3520(L)/3550(S)	8270	2-6	324		
Aniline	3520(L)/3550(S)	8270[e]	2-6	324		
Anthracene	3520(L)/3550(S)	8270	2-4,2-6	324		
Aramite	3520(L)/3550(S)	8270		324		
Benzidine	3520(L)/3550(S)	8270[e]	2-6			
Benzoic acid	3520(L)/3550(S)	8270	2-1			
Benzo(a) anthracene	3520(L)/3550(S)	8270	2-4,2-6	324		
Benzo(b)fluoranthene	3520(L)/3550(S)	8270	2-4,2-6	324		
Benzo(j)fluoranthene	3520(L)/3550(S)	8270[e]	2-4			
Benzo(k)fluoranthene	3520(L)/3550(S)	8270	2-4,2-6	324		
Benzo(g,h,i)perylene	3520(L)/3550(S)	8270	2-4,2-6	324		
Benzo(a)pyrene	3520(L)/3550(S)	8270	2-4,2-6	324		
Benzyl alcohol (phenyl methanol)	3520(L)/3550(S)	8270	2-1	324		
Bis(2-chloroethoxy)methane	3520(L)/3550(S)	8270	2-6,2-10	324		
Bis(2-chloroethyl)ether	3520(L)/3550(S)	8270	2-6	324		
Bis(2-chloroisopropyl)ether	3520(L)/3550(S)	8270	2-6,2-10			
Bis(2-ethylhexyl)phthalate	3520(L)/3550(S)	8270	2-2,2-6	325		

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

[a] SW 846 Test Methods for Evaluating Solid Waste, Revision 2, September 1994
[b] Interim Final RCRA Facility Investigation Guidance, Volume I of IV, Appendix B - Monitoring Constituents and Indicator Parameters, List 4 - Industry-Specific Monitoring Constituents, Table 2-X or List 1 - Indicator Parameters
[c] 40 CFR, Part 264, Appendix IX, Ground-Water Monitoring List, July 1, 1992 edition, page number listed
[d] These compounds are potential constituents of concern based on Enron's experience at similar gas transmission facilities
[e] Compound not on 1994 8270 list, but can be quantified by this method
[f] Compound used as internal standard
[g] Compound used as surrogate

Table 6-1b. Analyte List for Waste Characterization
Page 6 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
4-Bromophenyl phenyl ether	3520(L)/3550(S)	8270	2-6	325		
Butyl benzyl phthalate	3520(L)/3550(S)	8270	2-2,2-6	325		
4-Chloroaniline	3520(L)/3550(S)	8270	2-6	325		
Chlorobenzilate	3520(L)/3550(S)	8270		325		
1-Chloronaphthalene	3520(L)/3550(S)	8270[e]	2-6			
2-Chloronaphthalene	3520(L)/3550(S)	8270	2-6	325		
4-Chloro-3-methylphenol	3520(L)/3550(S)	8270	2-1	325		
2-Chlorophenol	3520(L)/3550(S)	8270	2-6	325		
4-Chlorophenyl phenyl ether	3520(L)/3550(S)	8270		325		
Chrysene	3520(L)/3550(S)	8270	2-4,2-6	325		
2-Cyclohexyl-4,6-dinitrophenol	3520(L)/3550(S)	8270	2-1			
Diallate	3520(L)/3550(S)	8270		325		
Dibenz(a,h)acridine	3520(L)/3550(S)	8270[e]	2-4			
Dibenz(a,j)acridine	3520(L)/3550(S)	8270	2-4,2-6			
Dibenz(a,h)anthracene	3520(L)/3550(S)	8270	2-4,2-6	325		
7H-Dibenzo(c,g)carbazole	3520(L)/3550(S)	8270[e]	2-4			
Dibenzo(a,e)pyrene	3520(L)/3550(S)	8270	2-4			
Dibenzo(a,h)pyrene	3520(L)/3550(S)	8270[e]	2-4			
Dibenzo(a,i)pyrene	3520(L)/3550(S)	8270[e]	2-4			
Dibenzofuran	3520(L)/3550(S)	8270	2-6	325		
Di-n-butyl phthalate	3520(L)/3550(S)	8270	2-2,2-6	326		

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

[a] SW 846 Test Methods for Evaluating Solid Waste, Revision 2, September 1994
[b] Interim Final RCRA Facility Investigation Guidance, Volume I of IV, Appendix B - Monitoring Constituents and Indicator Parameters, List 4 - Industry-Specific Monitoring Constituents, Table 2-X or List 1 - Indicator Parameters
[c] 40 CFR, Part 264, Appendix IX, Ground-Water Monitoring List, July 1, 1992 edition, page number listed
[d] These compounds are potential constituents of concern based on Enron's experience at similar gas transmission facilities
[e] Compound not on 1994 8270 list, but can be quantified by this method
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[g] Compound used as surrogate

Table 6-1b. Analyte List for Waste Characterization
Page 7 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
1,2-Dichlorobenzene	3520(L)/3550(S)	8270	2-10,2-12	326	X	X
1,3-Dichlorobenzene	3520(L)/3550(S)	8270	2-10,2-12	326	X	X
1,4-Dichlorobenzene	3520(L)/3550(S)	8270	2-10,2-12	326	X	X
3,3'-Dichlorobenzidine	3520(L)/3550(S)	8270	2-6	326		
2,4-Dichlorophenol	3520(L)/3550(S)	8270	2-1	326		
2,6-Dichlorophenol	3520(L)/3550(S)	8270	2-1	326		
Diethyl phthalate	3520(L)/3550(S)	8270	2-2,2-6	326		
p-(Dimethylamino)azobenzene	3520(L)/3550(S)	8270	2-6	326		
Phosphorodithionic acid (Dimethoate)	3520(L)/3550(S)	8270	2-7	326		
7,12-Dimethylbenz(a)anthracene	3520(L)/3550(S)	8270	2-6	326		
α-,α-Dimethylphenethylamine	3520(L)/3550(S)	8270	2-6	326		
2,4-Dimethylphenol	3520(L)/3550(S)	8270	2-1	326		
Dimethyl phthalate	3520(L)/3550(S)	8270	2-2,2-6	326		
4,6-Dinitro-2-methylphenol	3520(L)/3550(S)	8270	2-1	326		
2,4-Dinitrophenol	3520(L)/3550(S)	8270	2-1	326		
2,4-Dinitrotoluene	3520(L)/3550(S)	8270	2-6	326		
2,6-Dinitrotoluene	3520(L)/3550(S)	8270	2-6	326		
Dinoseb (DNBP)	3520(L)/3550(S)	8270	2-1, 2-9	326		
Di-n-octyl phthalate	3520(L)/3550(S)	8270	2-2, 2-6	326		
Diphenylamine	3520(L)/3550(S)	8270[e]	2-6	327		
1,2-Diphenylhydrazine	3520(L)/3550(S)	8270[e]	2-6			

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

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Table 6-1b. Analyte List for Waste Characterization
Page 8 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
Disulfoton	3520(L)/3550(S)	8270	2-7	327		
Ethyl methanesulfonate	3520(L)/3550(S)	8270	2-6	327		
Fluoranthene	3520(L)/3550(S)	8270	2-4,2-6	327		
Fluorene	3520(L)/3550(S)	8270	2-4,2-6	327	X	X
2-Fluorobiphenyl	3520(L)/3550(S)	8270[e,f]	2-6			
Hexachlorobenzene	3520(L)/3550(S)	8270	2-5, 2-6	327		
Hexachlorobutadiene	3520(L)/3550(S)	8270	2-5, 2-6	327		
Hexachlorocyclopentadiene	3520(L)/3550(S)	8270	2-5, 2-6	327		
Hexachloroethane (perchloroethane)	3520(L)/3550(S)	8270	2-5, 2-6	327		
Hexachlorophene	3520(L)/3550(S)	8270		327		
Hexachloropropene	3520(L)/3550(S)	8270		327		
Indeno(1,2,3-cd)pyrene	3520(L)/3550(S)	8270	2-4,2-6	327		
Isodrin	3520(L)/3550(S)	8270		327		
Isophorone	3520(L)/3550(S)	8270	2-6	327		
Isosafrole	3520(L)/3550(S)	8270		327		
Methapyrilene	3520(L)/3550(S)	8270		327		
3-Methylcholanthrene	3520(L)/3550(S)	8270	2-4,2-6	328		
Methyl methanesulfonate	3520(L)/3550(S)	8270		328		
2-Methylnaphthalene	3520(L)/3550(S)	8270	2-6	328	X	X
3-Methylphenol (m-cresol)	3520(L)/3550(S)	8270		325		
2-Methylphenol (o-cresol)	3520(L)/3550(S)	8270	2-1	325		

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Table 6-1b. Analyte List for Waste Characterization
Page 9 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
4-Methylphenol (p-cresol)	3520(L)/3550(S)	8270	2-1	325		X
Naphthalene	3520(L)/3550(S)	8270	2-4,2-6	328	X	X
1,4-Naphthoquinone	3520(L)/3550(S)	8270		328		
1-Naphthylamine	3520(L)/3550(S)	8270	2-6	328		
2-Naphthylamine	3520(L)/3550(S)	8270	2-6	328		
2-Nitroaniline (o-Nitroaniline)	3520(L)/3550(S)	8270	2-6	328		
3-Nitroaniline (m-Nitroaniline)	3520(L)/3550(S)	8270	2-6	328		
4-Nitroaniline (p-Nitroaniline)	3520(L)/3550(S)	8270	2-6	328		
Nitrobenzene	3520(L)/3550(S)	8270	2-6	328		
2-Nitrophenol	3520(L)/3550(S)	8270	2-1	328		
4-Nitrophenol	3520(L)/3550(S)	8270	2-1	328		
4-Nitroquinoline 1-oxide	3520(L)/3550(S)	8270		328		
N-Nitrosodi-n-butylamine	3520(L)/3550(S)	8270	2-6	328		
N-Nitrosodiethylamine	3520(L)/3550(S)	8270		328		
N-Nitrosomethylethylamine	3520(L)/3550(S)	8270[e]		328		
N-Nitrosomorpholine	3520(L)/3550(S)	8270[e]		328		
N-Nitrosodimethylamine	3520(L)/3550(S)	8270[e]	2-6	328		
N-Nitrosodiphenylamine	3520(L)/3550(S)	8270	2-6	328		
N-Nitrosodi-n-propylamine	3520(L)/3550(S)	8270	2-6	328		
N-Nitrosopiperidine	3520(L)/3550(S)	8270	2-6	328		
N-Nitrosopyrrolidine	3520(L)/3550(S)	8270		328		

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

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Table 6-1b. Analyte List for Waste Characterization
Page 10 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
5-Nitro-o-toluidine	3520(L)/3550(S)	8270		328		
Parathion	3520(L)/3550(S)	8270	2-7	328		
Pentachlorobenzene	3520(L)/3550(S)	8270	2-6	328		
Pentachloronitrobenzene	3520(L)/3550(S)	8270	2-6	328		
Pentachlorophenol	3520(L)/3550(S)	8270	2-1	328		
Phenacetin	3520(L)/3550(S)	8270	2-6	328		
Phenanthrene	3520(L)/3550(S)	8270	2-4,2-6	328		
Phenol (carbolic acid)	3520(L)/3550(S)	8270	2-1	329		
p-Phenylenediamine	3520(L)/3550(S)	8270		329		
Phorate	3520(L)/3550(S)	8270		329		
2-Picoline	3520(L)/3550(S)	8270	2-6	329		
Pronamide	3520(L)/3550(S)	8270	2-6	329		
Pyridine (azabenzene)	3520(L)/3550(S)	8270		329		
Pyrene	3520(L)/3550(S)	8270	2-4,2-6	329	X	X
Safrole	3520(L)/3550(S)	8270		329		
Terphenyl	3520(L)/3550(S)	8270[e,f]		329		
1,2,4,5-Tetrachlorobenzene	3520(L)/3550(S)	8270	2-6	329		
2,3,4,6-Tetrachlorophenol	3520(L)/3550(S)	8270	2-1	329		
Tetraethyl dithiopyrophosphate	3520(L)/3550(S)	8270[e]		329		
o-Toluidine	3520(L)/3550(S)	8270		329		
1,2,4-Trichlorobenzene	3520(L)/3550(S)	8270	2-6	329		

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

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Table 6-1b. Analyte List for Waste Characterization
Page 11 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
2,4,5-Trichlorophenol	3520(L)/3550(S)	8270	2-1	329		
2,4,6-Trichlorophenol	3520(L)/3550(S)	8270	2-1	329		
0,0,0-Triethyl phosphorothioate	3520(L)/3550(S)	8270		329		
sym-Trinitrobenzene	3520(L)/3550(S)	8270		329		
Organochlorine Pesticides/PCBs						
Aldrin	3520(L)/3550(S)	8080	2-6,2-8	324		
α-BHC (benzene hexachloride)	3520(L)/3550(S)	8080	2-6,2-8	324		
β-BHC (benzene hexachloride)	3520(L)/3550(S)	8080	2-6,2-8	324		
δ-BHC (benzene hexachloride)	3520(L)/3550(S)	8080	2-6,2-8	324		
γ-BHC (benzene hexachloride)(Lindane)	3520(L)/3550(S)	8080	2-6,2-8	324		
Chlordane	3520(L)/3550(S)	8080	2-6,2-8	325		
4,4'-DDD	3520(L)/3550(S)	8080	2-6,2-8	325		
4,4'-DDE	3520(L)/3550(S)	8080	2-6,2-8	325		
4,4'-DDT	3520(L)/3550(S)	8080	2-6,2-8	325		
Dieldrin	3520(L)/3550(S)	8080	2-6,2-8	325		
Endosulfan I	3520(L)/3550(S)	8080	2-6,2-8	326		
Endosulfan II	3520(L)/3550(S)	8080	2-6,2-8	327		
Endosulfan sulfate	3520(L)/3550(S)	8080	2-6,2-8	327		
Endrin	3520(L)/3550(S)	8080	2-6,2-8	327		
Endrin aldehyde	3520(L)/3550(S)	8080	2-6,2-8	327		

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Table 6-1b. Analyte List for Waste Characterization
Page 12 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
Endrin ketone	3520(L)/3550(S)	8080[e]	2-6			
Heptachlor	3520(L)/3550(S)	8080	2-6,2-8	327		
Heptachlor epoxide	3520(L)/3550(S)	8080	2-6,2-8	327		
Kepone	3520(L)/3550(S)	8080[e]	2-8	327		
Methoxychlor	3520(L)/3550(S)	8080	2-6,2-8	328		
Toxaphene	3520(L)/3550(S)	8080	2-6,2-8	329		
PCB-1016 (Aroclor-1016)	3520(L)/3550(S)	8080	2-6,2-8	328	X	X
PCB-1221 (Aroclor-1221)	3520(L)/3550(S)	8080	2-6,2-8	328	X	X
PCB-1232 (Aroclor-1232)	3520(L)/3550(S)	8080	2-6,2-8	328	X	X
PCB-1242 (Aroclor-1242)	3520(L)/3550(S)	8080	2-6,2-8	328	X	X
PCB-1248 (Aroclor-1248)	3520(L)/3550(S)	8080	2-6,2-8	328	X	X
PCB-1254 (Aroclor-1254)	3520(L)/3550(S)	8080	2-6,2-8	328	X	X
PCB-1260 (Aroclor-1260)	3520(L)/3550(S)	8080	2-6,2-8	328	X	X

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Table 6-1b. Analyte List for Waste Characterization
Page 13 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
Metals						
Aluminum (Al)	3010(L)/3050(S)	6010	2-15			
Antimony (Sb)	3010(L)/3050(S)	6010	2-15	324		
Arsenic (As)	3010(L)/3050(S)	6010	2-15	324	X	X
Barium (Ba)	3010(L)/3050(S)	6010	2-15	324	X	X
Beryllium (Be)	3010(L)/3050(S)	6010	2-15	324		
Cadmium (Cd)	3010(L)/3050(S)	6010	2-15	325		
Chromium (Cr)	3010(L)/3050(S)	6010	2-15	325	X	X
Cobalt (Co)	3010(L)/3050(S)	6010	2-15	325		
Copper (Cu)	3010(L)/3050(S)	6010	2-15	325		
Lead (Pb)	3010(L)/3050(S)	6010	2-15	327		
Mercury (Hg)	3020(L)/3050(S)	7000	2-15	327	X	X
Nickel (Ni)	3010(L)/3050(S)	6010	2-15	328		
Selenium (Se)	3010(L)/3050(S)	6010	2-15	329		
Silver (Ag)	3010(L)/3050(S)	6010	2-15	329		
Thallium (Tl)	3010(L)/3050(S)	6010	2-15	329		
Tin (Sn)	3020(L)/3050(S)	7000		329		
Vanadium (V)	3010(L)/3050(S)	6010	2-15	329		
Zinc (Zn)	3010(L)/3050(S)	6010	2-15	330		

L = Liquid samples (e.g., ground water)
S = Solid samples (e.g., soil)

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Table 6-1b. Analyte List for Waste Characterization
Page 14 of 15

Analtye	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern[d]	
					Soils	Ground Water
Miscellaneous						
Total cyanide		9012		325		
Total sulfide		9030		329		
Total petroleum hydrocarbons		418.1			X	X

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Table 6-1b. Analyte List for Waste Characterization
Page 15 of 15

Analyte	Laboratory Preparation Method[a]	Analysis Method[a]	RFI Guidance[b]	Appendix IX[c]	Potential Contaminant of Concern
Indicator Parameters (Ground Water Only)					
Calcium (Ca)	3010	6010	List 1		
Chloride	None	9250	List 1, 2-15		X
Iron (Fe)	3010	6010	List 1, 2-15		
Magnesium (Mg)	3010	6010	List 1, 2-15		
Manganese (Mn)	3010	6010	List 1, 2-15		
Nitrate and nitrite	None	9200	List 1		
Potassium (K)	3010	6010	2-15		
Sodium (Na)	3010	6010	2-15		
Sulfate	None	9038	List 1		
Total alkalinity	None	310.1	List 1		
TDS	None	160.1			X

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S 6+00 S 4+00 S 2+00 0+00 N 2+00 N 4+00 N 6+00 N 8+00 N 10+00 N 12+00 N 14+00 N 16+00 N 18+00 N 20+00 N 22+00

W 10+00 W 8+00 W 6+00 W 4+00 W 2+00 0+00 E 2+00 E 4+00

U.S. Highway No. 285

Former Station Water Supply Well TW-1

Office Bldg.

Dist. Office Bldg.

Septic Tank

Fire Hose House

Warehouse & Office Bldg.

Metal Storage Building

Radio Tower

Radio Bldg.

Shop

Utility & Garage

Wash Rack

Wash Rack Sumps

Former Leach-Field

Lube Oil Storage Tanks

Concrete Monument

Pump House

Water Standpipe

Telemetry Bldg.

Future Air Storage Tanks

Fire Hose House

Fire Training Area

Gravel Road

MW-6

Ground-Water Flow Direction

North Loading Dock

MW-5

Drum Storage Area

Pipe Rack

Concrete Monument

Air Storage Tanks

Repair Kit

South Loading Dock

Cooling Towers

Engine Room Sump

Engine Room

Waste Oil Tank

Junk Bin

Hose Shed

Hydrant

Blowdown Stack

Concrete Monument

Bldg.

Bldg.

Bldg.

Condensate Waste Tank

Pig Wash Rack

Panhandle Pig Receiver

Mist Extractor

Pit 3

MW-2

Pit 1

Pit 2

RW-1

MW-1

MW-3

MW-1B

West Texas Pipeline (Main Line)

Pig Receiver

Pig Launcher

Pond

West Texas Pipeline

Panhandle Pipeline

N

0 200'

Monitor well

D:\4115\1-2SP.DWG

DANIEL B. STEPHENS & ASSOCIATES, INC.

1-95

JN 4115

ROSWELL COMPRESSOR STATION

Site Plan

Figure 2-1

Phone (505) 623-2761
FAX (505) 625-8060

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

May 08, 1995

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Re: Renewal of Discharge Plan GW-052

Dear Mr. Anderson:

Transwestern Pipeline Company (Transwestern), owner and operator of the Roswell Compressor Station, is in receipt of the Oil Conservation Division's (OCD) March 21, 1995 letter, requesting renewal of the above referenced discharge plan. By this letter, Transwestern requests renewal of the discharge plan for the Roswell Compressor Station. Under the original application, Transwestern provided all necessary and accurate information and was issued a plan by the OCD on November 9, 1990.

During the five (5) year operating period of this approved plan, the activities at the facility which are covered under this plan have remained essentially consistent. The only information not addressed under the plan, and is presently ongoing, is a remediation activity in the northeast portion of the facility where hydrocarbon materials are being removed from the underlying groundwater. Transwestern has installed a series of monitor and production wells to address removal of the hydrocarbon constituents present. In addition, Transwestern has constructed an above ground tank for temporary storage of the liquids removed from the surface of the groundwater. Secondary containment has also been provided for this tank which complies with the regulations for SPCC. The attached diagram depicts the monitor and production well.

Also, as required under 3-114 of the Water Quality Control Regulations, enclosed find a $50.00 nonrefundable filing fee for this renewal application.

If you should require any additional information concerning this renewal application, contact our Roswell Technical Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

May 4, 1995

Mr. Roger Anderson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Transwestern Pipeline Company Roswell Compressor Station

Dear Roger,

During our last meeting you indicated that your office was interested in staying informed with the progress of closure activities for the former surface impoundment at the subject facility. Therefore, for your review and files, we have enclosed a copy of two letters Transwestern recently received from the State of New Mexico Environment Department, Hazardous and Radioactive Materials Bureau.

Transwestern will continue to copy your office on all correspondence originating from our office. We can also prepare a copy of all prior correspondence originating from the NMED if you need. Just contact me at (713) 646-7644 or George Robinson at (713) 646-7327 and we can gather this information and mail it to your office.

Sincerely,

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

attachments

xc: Bill Olson NMOCD Santa Fe, NM

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
525 Camino De Los Marquez
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-4358
Fax (505) 827-4389

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 10, 1995

Mr. Larry Campbell, Director
Transwestern Pipeline Company
Technical Operations
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: EPA Part A Permit Application

This letter is written to respond to Transwestern Pipeline Company's (TPC) question of March 30, 1995 as to why TPC was asked by the New Mexico Environment Department, Hazardous and Radioactive Materials Bureau (HRMB) to provide a Part A Environmental Protection Agency (EPA) permit Application. The reasons for that include:

(1) The need for the HRMB to register TPC in the Resource Conservation and Recovery Act Information System (RCRIS). This enables the EPA to keep track of HRMB projects and commitments, and also the status of the activities of regulated facilities in the State of New Mexico.

(2) The Part A application is an official EPA form that the State of New Mexico has adopted. It contains the information necessary to register facilities on RCRIS. The Part A application has no bearing on which hazardous waste regulations apply to TPC. Applicability of regulations to TPC is found at 20 NMAC 4.1, Subpart VI 40 CFR Section 265.1(b). These regulations apply to facilities that provided timely notification of hazardous waste activity and submitted Part A application; as well as to those facilities that did not notify of hazardous waste activity and did not submit Part A application. The regulations of 20 NMAC 4.1 Section 265 define the minimum standards for acceptable hazardous waste management until certification of final closure, or if the facility is subject to post-closure requirements, until post-closure responsibilities are fulfilled.

If you have further questions on the above explanation you may call Cornelius Amindyas of my staff at (505) 827-4308.

Sincerely,

Stephanie Kruse

for Barbara Hoditschek, Manager
RCRA Permits Program
Hazardous and Radioactive materials Bureau

cc: Benito Garcia, HRMB
File Red, 95
File Reading, 95

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
525 Camino De Los Marquez
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-4358
Fax (505) 827-4389

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

COPY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 28, 1995

Mr. Larry Campbell
Division Environmental Specialist
Transwestern Pipeline Company
Roswell, New Mexico 88202-1717

RE: Request for Additional Information

Dear Mr. Campbell:

During the meeting of March 30, 1995 between Hazardous and Radioactive Materials Bureau (**HRMB**) officials and representatives of Transwestern Pipeline Company (**TW**) in Santa Fe TW made a commitment to provide additional information to HRMB. It was also agreed that after HRMB has re-written the (TW) Closure Plan, a copy will be sent to TW. Transwestern Pipeline Company will then peruse the document and submit comments to HRMB within seven (7) days after the receipt of the document. TW comments will be considered for incorporation into the subject plan. The finalized plan will be Public Noticed for a period of thirty (30) days. During this period members of the public can send in written comments to HRMB regarding the proposed Closure Plan.

In order to expedite the development of the subject plan, the Hazardous and Radioactive Materials Bureau requests Submittals 1-4 below from Transwestern Pipeline Company within one week upon receiving this letter. Submittals 1-4 will be incorporated into TW's modified Closure Plan for Roswell Compressor Station RCRA Surface Impoundments. Submittals 5-7 below will be due within thirty (30) days following completion of work for waste unit characterization. Submittals 5-7 will be included as an amendment to the modified Closure Plan.

Submittal 1: TW shall develop a listing of petroleum refining hazardous constituents found in **List 4** (Industry Specific Monitoring Constituents) of U.S. EPA, May 1989, RCRA Facility Investigation **(RFI)** Guidance. This listing will be used for the waste-unit characterization of hazardous constituent monitoring list. The listing should include appropriate analytical methods and preparation techniques per hazardous constituent (EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, Third Edition, Update II).

Submittal 2: TW shall develop a flow chart specifying activities and time-lines as discussed in our March 30, 1995 meeting. This project schedule will be submitted to HRMB for approval within 30 days of receipt of this notification. The approved schedule will be included in the modified closure plan in the appropriate section (e.g., Figure 7-1).

Submittal 3: The standards cited in the January 15, 1995 Closure Plan, Tables 3-2 through 3-5, either do not apply to action levels for RCRA regulated units (e.g., TCLP Limit) or are not representative of the lower applicable standard (e.g., in some cases U.S. EPA Drinking Water Standards are lower than Subpart S or NMWQCC standards and *vice versa*). The standards included in the tables shall be revised to reflect the lowest applicable action levels. As stated in a previous Notice of Deficiency (NOD) dated September 28, 1994, and at a meeting held between TW and HRMB on November 8, 1994, acceptable ground-water protection standards for RCRA units are derived not only using guidance from the New Mexico Water Quality Control Commission (NMWQCC) but also considering U.S. EPA Drinking Water Standards, as well as 40 CFR Subpart S guidance (Appendix A[Examples of Concentrations Meeting Criteria for Action Levels], Appendix B[Maximum Contaminant Levels], and Appendix C[Range of Concentrations for Establishing Media Protection Standards for Carcinogens] or other acceptable methodology. Soil action levels for RCRA units are derived with guidance from 40 CFR Subpart S or other acceptable methodology.

Submittal 4: TW shall submit a standard operating procedure (SOP) for the use of a mobile laboratory to be utilized during the soil assessment phase of corrective action for the analysis of total petroleum hydrocarbons (TPH). This SOP should include a section describing associated quality assurance and quality control (QA/QC) to be expected by the mobile laboratory for analysis of TPH. This submittal will be included in the SOP section of Appendix F within the modified Closure Plan.

Submittal 5: TW shall develop a listing of media-specific action levels, per Subpart S guidance or some other acceptable methodology (e.g. EPA Region 3 guidance), for all hazardous constituents found in Appendix IX of 40 CFR Part 264 and in List 4 (Industry Specific Monitoring Constituents) of U.S. EPA, May 1989, RCRA Facility Investigation (RFI) Guidance which are detected from waste-unit characterization. The algorithms employed should be clearly stated with all assumptions and input parameters listed with reference.

Submittal 6: TW shall develop a table of expected background concentrations for all hazardous metals presented in List 4 based on a literature review of similar environmental settings. Defendable statistical analysis of the data must be presented as well as the methodology employed during the background investigations and all appropriate references. The concentrations should be presented in constant units of measurement.

Submittal 7: TW shall develop a surface sediment/soil drainage sampling and analysis plan (SAP) to investigate the extent of contamination via this pathway. Based on the results of soil boring PS-OS-377, it appears that TPH extends well beyond the facility boundary migrating off-site by surface drainage transport. The SAP will be included in the approved modified Closure Plan as an amendment.

Should you have any questions concerning this matter please contact Ms. Teri Davis of the Technical Compliance Program at 827-4308.

Sincerely,

Barbara Hoditschek

Barbara Hoditschek, Manager
RCRA Permitting Program
Hazardous and Radioactive Materials Bureau

cc: Ronald Kern, HRMB
Teri Davis, HRMB
Cornelius Amindyas, HRMB
Marc Sides, EPA
FILE TW RED94
Bill Kendrick, ENRON
George Robinson, ENRON

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

April 19, 1995

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de Los Marquez
P.O. Box 26110
Santa Fe, NM 87502

RE: Report of Interim Corrective Measures
Transwestern Pipeline Company Roswell Compressor Station
Reporting Period: January 1, 1995 through March 31, 1995

Dear Ms. Hoditschek,

This letter report of interim corrective measures at the Roswell Station covers the calendar quarter of January 1995 through March 1995. In December 1994, Transwestern Pipeline Company (TPC) obtained the services of a local contractor, Clayton M. Barnhill, to provide routine operations and maintenance services beginning January 1, 1995. Each month, Mr. Barnhill prepares and submits a spreadsheet report which details various information associated with the interim corrective measures system. A copy of Mr. Barnhill's reports, for each month within the reporting period, are attached.

I. **Volume of Liquids Recovered (gallons)**	During Reporting Period	To Date
1. Phase Separated Hydrocarbons (PSH)	423	6,677
2. Ground Water	314	5,971
3. PSH and Ground Water Combined	737	12,648

II. **Accumulation Time for Recovered Liquids**	
1. Date liquids last removed from recovery tank	January 10, 1995
2. Last day of reporting period	March 31, 1995
3. Accumulation time to last day of reporting period	80 days

III. General Comments

On January 4, 1995, TPC removed the PSH skimmers from the recovery pumps set in wells MW-1 and RW-1. The primary objective of this action was to substantially reduce the thickness of PSH collected in these two recovery wells. It was previously reported, that as a result of removing the skimmers, a significant volume of PSH and water were recovered within the five day period immediately following their removal. However, it has since been determined that the initial elevated recovery rate was not sustained for any significant duration and the volume measurements were in error. The measurement problem which resulted in this error has been corrected and the estimated volume of liquids recovered presented in this report are believed to be accurate.

On January 8, 1995, the operations and maintenance contractor noted a hydrocarbon odor during inspection of the secondary containment system for pump #2 (recovery well MW-1B). Pump #2 was therefore shut off until the problem could be identified and resolved. Subsequently, it was discovered that an elbow in the discharge line had failed (cracked) and recovered liquid had leaked into the secondary containment line. The failed part was replaced and the system placed back in service. During the repair of the discharge line, the contractor looked for evidence of a discharge (such as soil staining) from the secondary containment to the ground and no such evidence was found. Also, during the repair operation, the air supply line which operates the recovery pumps was inadvertently ruptured. This resulted in a complete system shut down of fourteen days while the air line was repaired.

The following comment is in regard to an event which occurred outside the reporting period but is significant enough to warrant noting at this time. The effectiveness of the preceding January 4, 1995 actions to reduce the thickness of PSH collected in the MW-1 recovery well was limited by the depth the pump was set in the well. Therefore, in order to remove this limitation, on April 1, 1995, TPC replaced the discharge tubing on the pump set in MW-1 with a greater length of new tubing. This effectively lowers the depth at which the pump is set. Subsequent measurements taken to evaluate the effectiveness of this action are as follows:

Date of Measurement at MW-1	Depth to Water (ft.)	Depth to PSH (ft.)	PSH Thickness (ft.)
March 31, 1995 (Prior to action)	60.22	49.12	11.1
April 19, 1995 (Subsequent to action)	63.79	63.75	0.04

Based on the measurements presented above, this action was effective in reducing the thickness of PSH collected in recovery well MW-1. More information regarding this issue, including sustained recovery rates, will be available and presented in the next quarterly reporting period report.

If you have any questions regarding the content or format of this report, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

gcr/BK

cp w/enclosures:

Teri Davis	NMED HRMB	Santa Fe, NM
Roger Anderson	NMOCD	Santa Fe, NM

Transwestern Pipline Facility
Remediation System Maintenance
Roswell, New Mexico

Recovery Well Log Sheet	Month:	Day:	Well #	Product Level	Water Level	Pump # / MW #	Flow Rate	Cycle Time	Tank Recovered Fluid Level	Product	Water	Remarks:	Inspector	Time
Enron Roswell Remediation System Maintenance	Jan-95	1-Jan	RW-1/p1	38' 10"	38' 11"	Pump 1/RW-1	125MU/60 Sec.		2.32'	0.70'	1.62'	Pumps 1,2,3,4 On, No spills or leaks	CMB	5:30-5:45 p.m.
Transwestern Pipeline Facility		2-Jan	MW-1B/p2	59' 1"	59' 1.5"	Pump 2/MW-1B	10 MU 120 sec.					Pumps 1,2,3,4 On, No spills or leaks	CMB	9:30-9:45 a.m.
6381 North Main Street		3-Jan	MW-2/p3	No Product	59'	Pump 3/MW-2	100/ 60 sec.					Pumps 1,2,3,4 On, No spills or leaks	CMB	3:15-3:30 p.m
Roswell, New Mexico 88201		4-Jan	MW-1/p4	48' 6.5"	59' 1"	Pump 4/MW-1	150/ 60sec..					Pumps 1,2,3,4 On, No spills or leaks	CMB	10:00-10:15 a.m.
		5-Jan										Pumps 1,2,3,4 On, No spills or leaks	CMB	2:00-2:15 p.m.
Prepared By:		6-Jan										Pumps 1,2,3,4 On, No spills or leaks	CMB	4:45-5:00 p.m.
Clayton M. Barnhill		7-Jan										Pumps 1,2,3,4 On, No spills or leaks	CMB	9:30-9:48 a.m.
Consulting Geologist		8-Jan							Pump 2 Shut off due to leakage			Pumps 1, 3, 4, On, No Spills or Leaks	CMB	9:45-10:10 a.m.
PO Box 2304		9-Jan				Pump 1/RW-1	Trace/ 60 Sec.		2.32'	0.70'	1.62'	Pumps 1, 3, 4, On, No Spills or Leaks	CMB	2:15-3:00 p.m.
Roswell, New Mexico 88202-2304		10-Jan				Pump 2/MW-1B	Off		Tank Emptied			Pumps 1, 3, 4, On, No Spills or Leaks	CMB	10:00-10:15a.m.
(505) 622-2012		11-Jan				Pump 3/MW-2	100 MU/ 120 sec.					Pumps 1, 3, 4, On, No Spills or Leaks	CMB	8:00-8:20 a.m.
		12-Jan				Pump 4/MW-1	10 MU/ 60sec.					Pumps 1, 3, 4, On, No Spills or Leaks	CMB	7:15-7:30 a.m.
		13-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	3:30-3:40 a.m.
		14-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	2:20-2:40 p.m.
		15-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	8:15-8:30 p.m.
		16-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	9:00-9:15 a.m.
		17-Jan				Pump 1/RW-1	Trace/ 60 Sec.		0.3'	0.3'	0	Pumps 1, 3, 4, On, No Spills or Leaks	CMB	11:30-a.m.-12p.m.
		18-Jan				Pump 2/MW-1B	Off					Pumps 1, 3, 4, On, No Spills or Leaks	CMB	5:10-5:20 a.m.
		19-Jan				Pump 3/MW-2	50 MU/ 120 sec.					Pumps 1, 3, 4, On, No Spills or Leaks	CMB	9:10-9:20 a.m.
		20-Jan				Pump 4/MW-1	10 MU/ 60sec.					Pumps 1, 3, 4, On, No Spills or Leaks	CMB	2:45-3:00 p.m.
		21-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	12:30-12:45 p.m.
		22-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	5:30-5:45 a.m.
		23-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	4:30-4;50 p.m.
		24-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	5:30-5:45 a.m.
		25-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	ST	4:30-4:45 p.m.
		26-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	ST	4:30-4:45 p.m.
		27-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	ST	5:15-5:30 p.m.
		28-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	4:30-4:45 p.m.
		29-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	3:30-3:45 p.m.
		30-Jan										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	4:45-5:00 p.m.
		31-Jan	RW-1/p1	38.90'	39.15'	Pump 1/RW-1	Trace/ 60 Sec.		1.05'	0.96'	0.12'	Pumps 1, 3, 4, On, No Spills or Leaks	CMB	10:00a.m.-12:p.m.
			MW-1B/p2	58.24'	61.0'	Pump 2/MW-1B	Off							
			MW-2/p3	58.94'	59.0'	Pump 3/MW-2	50 MU/ 120 sec.							
			MW-1/p4	48.58'	59.40'	Pump 4/MW-1	Trace/ 60sec.							
								Totals:						
									31.5 gallons / inch of tank volume	52.29 gallons	54.8gallons			
									107.79 gallons/3.45 gallons per day	1.68gal/day	1.76 gal/day			

Transwestern Pipline Facility
Remediation System Maintenance
Roswell, New Mexico

Recovery Well Log Sheet	Month:	Day:	Well #	Product Level	Water Level	Pump # / MW #	Flow Rate	Cycle Time	Tank Recovered Fluid Level	Product	Water	Remarks:	Inspector	Time
Enron Roswell Remediation System Maintenance	Feb-95	1-Feb				Pump 1/RW-1	Trace/ 60 Sec.		1.08'	0.96'	0.12'	Pumps 1, 3, 4, On, No Spills or Leaks	CMB	4:30-4:45 p.m.
Transwestern Pipeline Facility		2-Feb				Pump 2/MW-1B	Off					Pumps 1, 2, 4, On, No Spills or Leaks	CMB	10 am - 12 pm
6381 North Main Street		3-Feb				Pump 3/MW-2	50 ML/ 120 sec.					Pumps 1, 3, 4, On, No Spills or Leaks	CMB	10 am - 2 pm
Roswell, New Mexico 88201		4-Feb				Pump 4/MW-1	Trace/ 60sec.					Pumps 1, 3, 4, On, No Spills or Leaks	CMB	1:15 - 1:30 pm
		5-Feb										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	2:30-2:45 p.m.
Prepared By:		6-Feb										Pumps 1, 3, 4, On, No Spills or Leaks	CMB	9 am - 12 pm
Clayton M. Barnhill		7-Feb										Cut Air Line, Shut Down System	CMB	10 am - 4 pm
Consulting Geologist		8-Feb										Cut Air Line, Shut Down System	CMB	7:30 am - 2 pm
PO Box 2304		9-Feb										Repaired Airline Did not Hold, Broke	CMB	5:30 - 5:45 pm
Roswell, New Mexico 88202-2304		10-Feb										System Shut Down, Air Line Broken	CMB	Shut Down
(505) 622-2012		11-Feb										System Shut Down, Air Line Broken	CMB	Shut Down
		12-Feb										System Shut Down, Air Line Broken	CMB	5 - 6 pm
		13-Feb										System Shut Down, Air Line Broken	CMB	Shut Down
		14-Feb										System Shut Down, Air Line Broken	CMB	Shut Down
		15-Feb										System Shut Down, Air Line Broken	CMB	Shut Down
		16-Feb										System Shut Down, Air Line Broken	CMB	Shut Down
		17-Feb										System Shut Down, Air Line Broken	CMB	Shut Down
		18-Feb										System Shut Down, Air Line Broken	CMB	11 am -12:30 pm
		19-Feb										System Shut Down, Air Line Broken	CMB	Shut Down
		20-Feb	RW-1/p1	38.82'	39.20'	Pump 1/RW-1	Trace/ 60 Sec.		1.08'	0.98'	0.10'	System Shut Down, Air Line Broken	CMB	10 am -12:30 pm
		21-Feb	MW-1B/p2	58.79'	61.45'	Pump 2/MW-1B	Off					Pumps 1, 3, 4, On, No Spills or Leaks	CMB	10 am - 4 pm
		22-Feb	MW-2/p3	58.30'	60.62'	Pump 2/MW-2	25 ML/ 120 sec.					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	9 am - 4 pm
		23-Feb	MW-1/p4	48.58'	59.40'	Pump 4/MW-1	Trace/ 60sec.					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	8:30 - 9:00 am
		24-Feb										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	4:30 pm -5 pm
		25-Feb										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	7:00 -7:15 am
		26-Feb										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	12:30 - 12:45 pm
		27-Feb										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	5:15-5:30 p.m.
		28-Feb				Pump 1/RW-1	Trace/ 60 Sec.		1.08'	0.98'	0.10'	Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	7:30 -8 am
						Pump 2/MW-1B	10 ML/60 Sec							
						Pump 3/MW-2	25 ML/ 120 sec.							
						Pump 4/MW-1	Trace/ 60sec.							
								Totals:	31.5 gallons / inch of tank volume	6.3 gallons	0			
									6.3 gallons/ 14 days = 0.45gal/day	0.45gal/day				

Transwestern Pipline Facility
Remediation System Maintenance
Roswell, New Mexico

Recovery Well Log Sheet	Month:	Day:	Well #	Product Level	Water Level	Pump # / MW #	Flow Rate	Cycle Time	Tank Recovered Fluid Level	Product	Water	Remarks:	Inspector	Time
Enron Roswell Remediation System Maintenance	Mar-95	1-Mar				Pump 1/RW-1	Trace/ 60 Sec.	3 Cycle	1.08"	0.98"	0.10"	Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:30-6:45 a.m.
Transwestern Pipeline Facility		2-Mar				Pump 2/MW-1B	25ML/60 Sec					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6 am - 6:15 am
6381 North Main Street		3-Mar				Pump 3/MW-2	50 ML/ 120 sec.					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6 p.m. -6:15 p.m.
Roswell, New Mexico 88201		4-Mar				Pump 4/MW-1	Trace/ 60sec.					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	8:15 - 8:30 a.m.
		5-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:30-6:45 p.m.
Prepared By:		6-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:30-6:45 p.m.
Clayton M. Barnhill		7-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	8am. - 8:15 am.
Consulting Geologist		8-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	7:30 pm - 7:45 pm
PO Box 2304		9-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	4:30 - 4:45 pm
Roswell, New Mexico 88202-2304		10-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	4:30 - 4:45 pm
(505) 622-2012		11-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	7:45 - 8 a.m.
		12-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	7 - 7:15 p.m.
		13-Mar				Pump 1/RW-1	Trace/ 60 Sec.	3 Cycle	1.51"	1.04"	0.47"	Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	5:45 - 6 p.m.
		14-Mar				Pump 2/MW-1B	25ML/60 Sec					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:45 - 7 p.m.
		15-Mar				Pump 3/MW-2	50 ML/ 120 sec.					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:45 - 7 p.m.
		16-Mar				Pump 4/MW-1	Trace/ 60sec.					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6 -6:15 a.m.
		17-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	2:45 -3 p.m.
		18-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	10:30 a.m.-4:30 p.m
		19-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	2 -4 p.m.
		20-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	7 -7:26 p.m.
		21-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	7 -7:16 p.m.
		22-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	7 -7:15 p.m.
		23-Mar				Pump 1/RW-1	Trace/ 60 Sec.	3 Cycle	1.76"	1.12"	0.64"	Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6 -6:15 a.m.
		24-Mar				Pump 2/MW-1B	10 ML/60 Sec					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:20-6:40 p.m.
		25-Mar				Pump 3/MW-2	26 ML/ 120 sec.					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	3:00 -3:15 p.m.
		26-Mar				Pump 4/MW-1	Trace/ 60sec.					Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	8 -10 a.m.
		27-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	3 -4 p.m.
		28-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	4:30 -4:45 p.m.
		29-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:15 -6:30 p.m.
		30-Mar										Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:30 -6:45 p.m.
		31-Mar	RW-1/p1	38.84'	39.32'	Pump 1/RW-1	Trace/ 60 Sec.	3 Cycle	1.95"	1.12"	0.83"	Pumps 1,2, 3, 4, On, No Spills or Leaks	CMB	6:30 -6:45 p.m.
			MW-1B/p2	59.10'	59.12'	Pump 2/MW-1B	10 ML/60 Sec							
			MW-2/p3	59.00'	59.06'	Pump 3/MW-2	25 ML/ 120 sec.							
			MW-1/p4	49.12'	60.22'	Pump 4/MW-1	Trace/ 60sec.							
								Recovery:	0.87"	0.14"	0.73"			
								Totals:	31.5 gallons / inch of tank volume	4.41	22.99			
									27.40 gallons/ 31 days = 0.88gal/day	0.14 gal/day	0.74 gal/day			

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

January 16, 1995

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous & Radioactive Materials Bureau
525 Camino de Los Marquez
P.O. Box 26110
Santa Fe, NM 87502

RE: Closure Plan for the Former Surface Impoundments at the Roswell Station
Transwestern Pipeline Company Compressor Station No. 9, Roswell, New Mexico

Dear Ms. Hoditschek,

Transwestern Pipeline Company (TPC) submits the enclosed modified closure plan for the former surface impoundments located at the Roswell Compressor Station. As requested, two hard copies of the closure plan and one copy on disk in WordPerfect 5.2 format are enclosed. The closure plan was prepared by our outside consultant, Daniel B. Stephens & Associates (DBS&A) of Albuquerque, New Mexico. DBS&A prepared the plan at my direction and with the assistance of our internal consultants, George C. Robinson, P.E. and Kathleen O'Rielly, Cypress Engineering Services.

Also enclosed are a copy of a site specific health and safety plan prepared by DBS&A and a list of responses to the NMED comments contained in the NOD dated September 28, 1994.

A sincere effort has been made to prepare a closure plan that will satisfy both the administrative and technical requirements of the NMED as well as provide assurance that both human health and the environment will be protected.

If you have any questions regarding this submittal, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

gcr/BK

cp w/ enclosures: Roger Anderson NMOCD Santa Fe, NM

HEALTH AND SAFETY PLAN
for Field Activities at
Transwestern Pipeline Company
Roswell Compressor Station

ROSWELL, NEW MEXICO

Prepared for
Enron Environmental Affairs

Prepared by
Daniel B. Stephens & Associates, Inc.

January 12, 1995

Prepared by: Jeffrey Forbes — Date: 01/12/95
Jeffrey Forbes
Hydrogeochemist

Reviewed by: Chris Stegman for K. Myers — Date: 1-12-95
Health & Safety Coordinator

Approved by: Jeffrey Forbes — Date: 1-16-95

SITE SAFETY PLAN

1. INTRODUCTION

This health and safety plan contains guidelines for Daniel B. Stephens & Associates, Inc. (DBS&A) worker safety during drilling and soil sampling during the field activities associated with closure of former surface impoundments at Transwestern Pipeline Company's Roswell Compressor Station. The purpose of this plan is to familiarize the field personnel with safe operating procedures.

1.1 General Information

Project number: 4115

Project name: ENRON-Roswell

Site name: Transwestern Roswell Compressor Station No. 9

Site address: 6381 North Main Street
P.O. Box 2018
Roswell, NM 88201

Work description: Drilling using hollow stem auger drilling methods; soil sampling using split spoon samplers, field headspace analysis for volatile organic compounds, collection of soil and ground-water samples, aquifer testing

Project Manager: Jeffrey Forbes

DBS&A Site Safety Officer: Bill Casadevall

Plan prepared by: Jeffrey Forbes *Date*: 01/12/95

Work start date: Spring 1995 *Work Hours*: no restrictions

Client contact: George Robinson *Telephone #*: (713) 646-7327
Alternate contact: Larry Campbell *Telephone #*: (505) 625-8022

Describe special site entry procedures, if any:

Work will be performed on secured property belonging to Transwestern Pipeline Company. Field personnel will sign in at the office upon arrival.

Warning/method signal for site evacuation: Verbal

Presence of hazardous materials: (X) Potential ( ) Confirmed

The exact location of hazardous materials is:

( ) Known (X) Assumed ( ) Unknown

Distance, location and number of nearest phone: On-site cellular phone (DBS&A) or Transwestern office

Nearest public road: U.S. Highway 285 immediately west of office

Nearest water: Transwestern office

Nearest fire extinguisher: DBS&A Vehicle

Nearest first aid kit: DBS&A Vehicle

1.2 Potential Contamination

The subsurface soil and/or ground water may contain pipeline condensate, a petroleum hydrocarbon liquid similar to gasoline, but consisting primarily of saturated hydrocarbons in the C7-C11 range. The hydrocarbon contamination may be in liquid and/or gaseous (vapor) phase. Compounds such as n-octane, n-nonane, and n-decane are the most abundant components of pipeline condensate. Benzene, a major gasoline component, is generally only a minor constituent of pipeline condensate. However, benzene is a recognized carcinogen, and thus is given special consideration.

A previous soil vapor survey revealed the presence of small quantities of chlorinated VOCs, most notably 1,1,1-trichloroethane (TCA) and its degradation products.

Polychlorinated biphenyls (PCBs) are not expected at this site. As occupational carcinogens, however, precautions will be taken in case they are encountered.

Material	Route to Body Entry	Characterization
Hydrocarbons	Inhalation, ingestion, and physical contact	Irritant, asphyxiant, possible carcinogen
1,1,1-TCA	Inhalation, ingestion, and physical contact	Irritant, asphyxiant
n-octane	Inhalation, ingestion, and physical contact	Irritant, asphyxiant
PCBs	Physical contact (skin, eyes)	Irritant, carcinogen

Potential materials hazards to worker: Contact with pipeline condensate hydrocarbons and/or PCBs may result in dermal irritation due to desiccation. Inhalation of hydrocarbon and other organic vapors may result in oxygen deficiency and/or mucus membrane irritation. Mixtures of air and hydrocarbon vapors may reach explosive concentrations, thus creating an explosive hazard. Equally important are all of the physical hazards commonly associated with drilling activities, including pinch and trap hazards, back injuries, burns, excessive noise, and high-pressure hazards.

First Aid: VOCs and PCBs

Eyes:	Rinse immediately and thoroughly
Skin:	Soap wash immediately and thoroughly
Inhalation:	Fresh air
Ingestion:	Medical attention

Flammability limits: The flammable range for pipeline condensate vapors is variable and generally unknown. The following ranges are provided for comparison:

Diesel Fuel	LEL = 0.7%, UEL = 5.0%, 7,000 - 50,000 ppmv
Gasoline	LEL = 1.3%, UEL = 6.0%, 13,000 - 60,000 ppmv
1,1,1-TCA	LEL = 7.5%, UEL = 12.5%, 75,000 - 125,000 ppmv
n-octane	LEL = 1.0%, UEL = 6.5%, 10,000 - 65,000 ppmv
Aroclors	LEL/UEL = nonflammable

Flashpoint: Gasoline: 100° F @ 100% LEL

Hazard type: Liquid (X) Solid (X) Sludge ( ) Vapor/Gas (X)

Hazard Level: High ( ) Moderate (X) Low ( ) Unknown ( )

Characteristics: Corrosive ( ) Ignitible (X) Toxic (X) Reactive ( )
Volatile (X) Radioactive ( ) Biological Agent ( )

Field Monitoring: A portable photoionization detector (PID) or flame ionization detector (FID) will be used to monitor the breathing zone, as well as the area around and within the borehole. Concentrations within the breathing zone are not expected to be above background during the field investigation. If a PID meter is used, the high energy (11.7 eV) lamp will be used to ensure that VOCs with high ionization potentials, such as 1,1,1-TCA, are detected.

Compound	STEL	IDLH	OSHA PEL
Benzene	1 ppm	3,000 ppm	1 ppm
1,1,1-TCA	450 ppm	1,000 ppm	350 ppm
n-Octane	75 ppm	5000 ppm	300 ppm
Aroclor 1242	0.09 ppm	data not available	1 mg/m^3 (skin)

(1) STEL = Short-Term Exposure Limit (15 minutes)
(2) IDLH = Immediately Dangerous to Life and Health
(3) PEL = Permissible Exposure Limit
Source: NIOSH Pocket Guide to Chemical Hazards (1990).

In addition to potential chemical contamination, the following hazards may be present during drilling and sampling:

- Vehicular Traffic
- Electrical Shock
- Rotating machinery
- Uneven surfaces that could cause slips and falls
- Overhead equipment
- Airborne Dust
- Explosion and fire
- Excessive Noise
- Overhead and buried utilities
- Hypothermia and/or frostbite

2. SAFETY GUIDELINES FOR DRILLING AND SAMPLING ACTIVITIES

The following guidelines are meant to cover operations by the DBS&A field staff during drilling and collection of soil and ground-water samples. Safety guidelines for the drill crew and support personnel under the employ of the drilling contractor are not included in this plan. Health and safety issues for the contractor personnel working on site are the responsibility of the drilling contractor, not DBS&A.

2.1 Personal Health and Safety

The following DBS&A personnel will be involved in the project:

Jeffrey Forbes	Project Manager
Bill Casadevall*	Staff Geologist/On-site H&S Officer
Terry Deeds	Technician

2.1.1 Protective Equipment

The following personal protective equipment (PPE) shall be used whenever the field personnel are within the 25-foot work zone:

- Steel-toed work boots
- Hard hat
- Protective eyewear
- Hearing protection (if needed)

In addition, a half-face respirator with organic vapor cartridges and dust/mist prefilters, Tyvek coveralls, and work gloves shall be available for use whenever conditions require. The half-face respirator will be worn whenever organic vapors concentrations exceed levels outlined

in Section 2.2 of this plan. Tyvek coveralls and work gloves will be worn whenever conditions require the DBS&A field personnel to come in direct contact with potentially contaminated materials. Work areas will be established upwind of drilling activities to avoid unnecessary exposure to dust and/or organic vapors.

2.1.2 Hypothermia and/or Frostbite

Hypothermia and frostbite can result from exposure to low temperatures, high winds, long duration of exposure, and high humidity. When working out of doors during cold weather, the best prevention is to dress appropriately, minimize skin exposure, observe and be observed by coworkers, and take warmup breaks periodically. If conditions are extremely cold, body temperature and heart rate should be monitored hourly.

2.1.3 Eating and Drinking

No eating, drinking, smoking, or gum or tobacco chewing is allowed within the 25 foot work zone.

2.1.4 Eye Protection

Approved protective eyewear will be worn at all times when within the 25 foot radius work zone. The minimum eyewear protection required will be shatter-proof glasses, goggles, or face shields.

2.1.5 Dust Protection

When blowing dust makes it necessary to protect personnel, disposable-type dust masks will be worn, or the dust/mist prefilter will be used, if the half-face respirator is being worn.

2.1.6 Disposal of Contaminated Clothing or Equipment

All potentially contaminated clothing, Tyvek coveralls, gloves, paper towels, and other expendable items should be placed in garbage bags for disposal. As necessary, fresh Tyvek coveralls and work gloves should be donned to prevent accidental contact with potentially contaminated soil material.

2.2 Vapor Monitoring

The DBS&A health & safety officer will be present near the drilling rig at all times to monitor the work area for the presence of organic vapors using a PID or FID. Readings will be taken at a minimum of once every 5 feet of drilling advancement, or every 15 minutes of drilling, whichever occurs first. The headspace within the borehole and the breathing zone within the work area will be monitored. If the readings exceed or are anticipated to exceed 5 ppm above background in the breathing zone for 5 minutes, continuous monitoring will begin, and the half-face respirator will be worn by all DBS&A personnel within the work zone until vapor levels dissipate. If sustained organic vapor levels ever exceed 200 ppm within the hollow stem, borehole, or within the breathing space, all DBS&A personnel will evacuate the work

zone until vapor levels dissipate. If the reading remains greater than 20 ppm above background within the breathing zone for one hour, drilling operations will be temporarily halted, and the on-site DBS&A health and safety officer should contact the DBS&A project manager for further instructions. The drilling supervisor will be notified of all readings, and is responsible for decisions regarding drilling contractor personnel safety.

If monitoring with the PID/FID meters indicate a potential explosive hazard, a combustible gas meter will also be used to monitor the atmosphere within the boreholes and/or monitor wells. If the values exceed 10% LEL, continuous monitoring will begin. If the meter exceeds 25% of the LEL, work will cease immediately and the area will be evacuated until the vapors dissipate, or provisions are made to "inert" the borehole using carbon dioxide.

2.3 Drilling Activities

All DBS&A field personnel are to maintain a safe distance from the immediate area of the drill rig. A 25-foot radius work area around the drill rig shall be designated. DBS&A personnel shall enter this work zone only when necessary for the performance of the task at hand. DBS&A personnel will avoid overhead equipment and will work cautiously to avoid slips and falls. Caution will be maintained and loose clothing will not be worn near rotating machinery. Under no circumstance shall DBS&A personnel become directly involved in drilling operations, other than that immediately required for sample collection and for performance of vapor monitoring and geologic logging. **All kill switches and safety devices on the drill rig shall be located and tested prior to drilling.**

If the equipment is owned by a contractor, DBS&A's supervisor in charge of the job should properly and thoroughly instruct the contractor on exactly what results are to be accomplished and point out all known safety hazards. Personnel should be sure they have eye contact with mechanical equipment operator before approaching the equipment. Never approach heavy equipment from an operator's blind spots.

3. INITIAL H&S BRIEFING

A H&S briefing will be conducted before arriving on the site. The initial H&S briefing will be conducted by the DBS&A on-site H&S officer, and will be attended by all DBS&A personnel involved. The H&S plan and all pertinent H&S issues will be discussed during the briefing. All attendees will initial the H&S briefing form.

4. DAILY SAFETY MEETINGS

Prior to commencing each day's work activities, a "tailgate" safety meeting will be conducted by the DBS&A on-site safety officer. All personnel directly involved in the work operations will be required to attend. The meeting will address specific issues regarding on-site health and safety, including: recent problems, near-misses, work planned for the day and associated hazards, etc.

5. ACKNOWLEDGEMENTS

NAME	TITLE	SIGNATURE	DATE

DANIEL B. STEPHENS & ASSOCIATES, INC
HEALTH & SAFETY BRIEFING FORM

Project Number: 4115 *Date*: _____

Field Location: _____

Purpose of Work: _____

_____

Task to be Accomplished: _____

_____

_____

SOPs Required: _____

_____

Health & Safety Issues Discussed: _____

_____

_____

_____

_____

DBS&A Health and Safety Officer: _____

We the undersigned have read this Site Safety Plan and will institute the provisions and abide by the regulations contained herein:

NAME	TITLE	SIGNATURE	DATE

- **EMERGENCY PLANNING**

  AMBULANCE: 911 **FIRE DEPARTMENT: 911**

  POLICE: 911 **AIR EVACUATION: Call Hospital**

- **LOCAL HOSPITAL (ATTACHED MAP ILLUSTRATES ROUTE TO THIS HOSPITAL)**

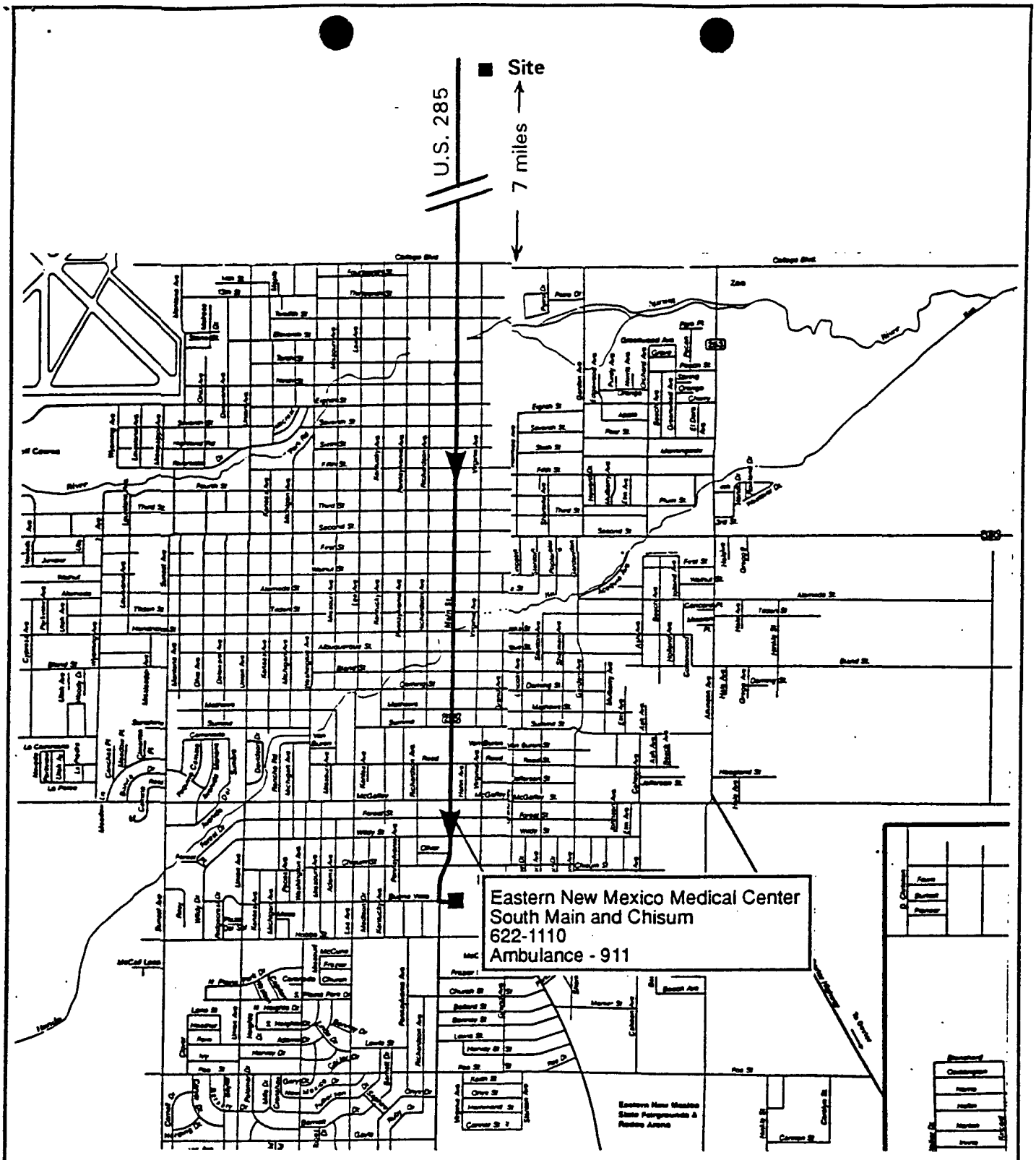
  NAME: Eastern New Mexico Medical Center

  ADDRESS: South Main & Chisum, Roswell NM

  TELEPHONE: (505) 622-1110

  EMERGENCY ROOM #: (505) 622-1110

  NEAREST PHONE: On-site cellular phone (DBS&A)
  Transwestern main office



Emergency Route to the Hospital

RESPONSES TO NMED COMMENTS ON CLOSURE PLAN FOR ROSWELL COMPRESSOR STATION SURFACE IMPOUNDMENTS

Transwestern Pipeline Company (Transwestern), a wholly owned subsidiary of ENRON Operations Corporation, submitted a closure plan dated May 31, 1994 to the New Mexico Environment Department (NMED) for closure of several former surface impoundments located at Transwestern's Compressor Station No. 9 near Roswell, New Mexico. The closure plan was prepared for Transwestern by Daniel B. Stephens & Associates (DBS&A) for submission to the NMED Hazardous and Radioactive Materials Bureau (HRMB) in order to satisfy the requirements of the New Mexico Hazardous Waste Management Regulations (20 NMAC 4.1).

NMED reviewed the closure plan and responded with a letter from the chief of the HRMB dated September 28, 1994, stating that the closure plan was technically deficient. As an attachment to the Notice of Technical Deficiency (NOD), NMED included 31 specific comments on the closure plan.

On November 1, 1994, Bill Kendrick and George Robinson attended a meeting with HRMB staff to discuss NMED's concerns. As a result of this meeting, as well as the comments received with the NOD, a revised closure plan has been prepared and submitted to NMED for review.

In addition to the revised closure plan, the following are Transwestern's responses to each of NMED's comments included with the NOD. In order to facilitate review, Transwestern's responses are numbered to correspond with NMED's comments, and references to the pertinent section(s) of the revised closure plan are included.

Responses to NMED Comments

1. Performance Standards: 20 NMAC 4.1, Subpart VI, 40 CFR, §265.112

Transwestern agrees with NMED's comment. Although TCLP metals analyses of soil samples have been performed in the past (see Table 3-3), TCLP analyses are not proposed in the closure plan for future sampling of soil or ground-water (see Section 6.1, Table 6-1).

It is well known that volatile organic compounds (VOCs) pose the greatest threat to ground-water quality at sites where pipeline condensate wastes have been stored and released. Although VOCs are believed to be the primary contaminants of concern at this site, Phase I samples will be analyzed for additional constituents as well. In order to ensure that no contaminants of concern have been missed, the initial round of ground-water and soil sampling will include analysis of RCRA Appendix IX VOCs, SVOCs, PCBs, metals, cyanide, and sulfide. The proposed Appendix IX suite will include the following analytical methods:

Appendix IX Analytes and Methods

Analyte Class	EPA SW-846 Method
VOCs	8240
SVOCs	8270
PCBs	8080
Cyanide	9010
Sulfide	9030
Appendix IX Metals	6000/7000 series

RCRA metals include Ag, As, Ba, Be, Cd, Cr, Co, Cu, Hg, Ni, Pb, Sb, Se, Sn, Tl, V, and Zn.

The analysis of soil and ground-water samples for Appendix IX constituents should serve to corroborate the determination, based on site history and previous investigations, that VOCs are the principal contaminants of concern at this site.

2. Corrective Action Plan: 20 NMAC 4.1, Subpart V, 40 CFR, §264.97 and 264.112

Transwestern agrees that it has been demonstrated that the uppermost aquifer has been impacted by hydrocarbons released from the former impoundments. However, the extent of ground-water contamination appears to be limited to the area immediately beneath and adjacent to the former impoundments, and interim corrective measures have been in progress since May 1993, as described in Section 3.5 of the closure plan. The ground-water assessment plan for investigation of the nature and extent of hydrocarbon impacts is included in Section 5 of the closure plan. As agreed upon in a meeting between NMED and Transwestern in Santa Fe, a ground water remediation plan will be submitted to NMED following completion of the field work

associated with the soil and ground-water assessment plans. Therefore, the remediation plan has not been included in the closure plan, but rather will be submitted as an amendment to the closure plan at a later date.

3. Location of Surface Impoundments

The exact locations of the former surface impoundments is not precisely known. However, the best available estimate of the latitude and longitude of the center of each of the impoundments is provided in Section 2.1 of the closure plan.

4. Hazardous Waste Inventory (Section 2.2)

Everything that is known regarding operation of the former impoundments is included in the revised Section 2.2 of the closure plan. As discussed in that section, there is little information available about past disposal practices, waste volumes, and periods of operation of the impoundments. However, it has been determined that the last impoundment in service was Pit 1 and that this impoundment was apparently not used after mid-1984. Furthermore, it has been determined that the principal chlorinated solvent used was 1,1,1-TCA. The prior investigations at the site are discussed in comprehensive detail in Sections 2 and 3 of the modified closure plan.

5. Releases from Surface Impoundments: 20 NMAC 4.1, Subpart V, 40 CFR, §264 Subpart F

As discussed in the response to comment #1 above, Appendix IX analyses are proposed for the initial round of ground-water sampling to be performed as Phase I of the implementation of the closure plan.

With regard to the statistical evaluation of background ground-water quality, the proposed statistical techniques have been added to Section 6.11 of the closure plan. Statistical methods will follow the EPA guidance document *Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities* (1989), which describes several recommended parametric and nonparametric methods to determine background constituent concentrations. These include Analysis of Variance (ANOVA) and development of tolerance intervals based on the normal distribution of values within a population. Such techniques will generally only be applied for inorganic constituents (e.g.,

metals), as the background concentration for organic compounds in ground water is essentially zero.

On December 1, 1994, an upgradient monitor well (MW-6) was installed approximately 500 feet southwest of the former location of Pit 1. The location of the new upgradient monitor well is shown on Figure 2-1 of the closure plan. Static water levels measured in monitor wells MW-3, MW-5, and MW-6 indicate that MW-6 is indeed upgradient of the former impoundments. Ground-water samples collected from this well, as well as soil samples collected during drilling, have shown that the well is outside the zone of hydrocarbon contamination beneath the former impoundments. Therefore, for statistical purposes ground-water samples collected from new upgradient well MW-6 should be representative of "background" ground-water quality.

6. Ground-Water Elevations

Transwestem agrees that ground-water elevation measurements are essential in establishing the direction of ground-water flow beneath the former impoundments. Depths to ground-water were measured in the on-site monitor wells during December 1994, along with the water level in the former deep on-site water supply well located in the southwest comer of the facility. In addition, the coordinates and elevations of each monitor well were established by resurveying each of the wells relative to the compressor station datum. The results of these activities are discussed in Section 3.6 of the closure plan.

Static water levels measured on December 22, 1994 in monitor wells MW-3, MW-5, and MW-6 indicate an east-northeast ground-water flow direction in the shallow alluvium, along a bearing of about N72E, and a dimensionless gradient of approximately 0.009. The flow direction is shown graphically in Figure 2-1 of the closure plan. The calculated ground-water flow direction and gradient are reasonable, based on the site topography and nature of subsurface sediments encountered during drilling.

7. Ground-Water Impacts (Section 3.6.3)

Section 3.6.3 has been revised to include a description of ground-water impacts.

12. Laboratory Analysis: 20 NMAC 4.1, Subpart V, 40 CFR, §264 Appendix IX

The closure plan has been revised to include Appendix IX analysis for soil and ground-water samples. Table 6-1 of the closure plan includes the complete list of proposed analytes. The suite of proposed analytes includes Appendix IX VOCs, SVOCs, PCBs, metals, cyanide, and sulfide. All pertinent sections of the closure plan have been revised accordingly.

13. Ground-Water Assessment Plan: (Section 5.1)

All ground-water monitor wells will be constructed in accordance with the EPA RCRA *Technical Enforcement Guidance Document* (TEGD, 1986), with updates in the EPA document entitled *RCRA Ground-Water Monitoring: Draft Technical Guidance* (1992). As described in Section 5.1 of the closure plan, the screened interval within the saturated zone will not exceed 15 feet. However, following a telephone discussion between Terri Davis (NMED-HRMB) and George Robinson (ENRON), provision has been made to install up to an additional 10 feet of screen within the unsaturated (vadose) zone, for a maximum total screen length of 25 feet. Total screen lengths longer than 15 feet will only be used if the well intercepts soils highly impacted with petroleum hydrocarbons, such that subsequent conversion of the monitor well to a soil-vapor extraction well may be required.

14. (Section 5.1)

The latitude and longitude of all existing monitor wells are provided in Table 3-6 of the revised closure plan. The horizontal coordinate system used to locate the wells and borings is consistent with the on-site grid and station datum, as shown in Figure 2-1 of the closure plan.

15. (Section 5.1.1)

The closure plan has been revised to include a phased approach, whereby the analytical results for soil borings drilled during Phase I will be used to locate borings to be drilled during subsequent phases. The locations of the Phase I borings and monitor wells are shown in Figure 4-1 and 5-1.

16. (Section 5.1.1)

Sections 4.1 and 4.2 of the revised closure plan provide the rationale for the Phase I soil sampling program, along with the number, location, and depth of soil samples to be collected. The rationale for the on-site boring locations is based on historical records and examination of aerial photographs. The rationale for the Phase I off-site monitor well locations is based on the direction and gradient of ground-water flow as calculated from water levels measured in existing monitor wells.

Transwestern recognizes that a phased approach is required, and Section 4.7 outlines the expected Phase II activities.

17. (Section 5.1.2)

Ground-water samples from existing deep wells TW-1 and Well #5, completed in the bedrock aquifer, have been collected and analyzed, as described in Section 3.6. The need for a downgradient deep monitor well will be determined based on the results of the Phase I ground-water assessment. If required, the deep monitor well will be installed during the Phase II investigation.

18. (Section 5.3)

The ground-water assessment plan has been revised accordingly.

19. (Section 5.4)

As discussed above in the response to comment #1, Appendix IX analyses will be performed on the soil and ground-water samples collected during Phase I. In addition, Transwestern proposes to analyze ground-water samples for major inorganic constituents and for TDS in order to characterize overall water chemistry. Following submittal of the Phase I report, Transwestern proposes to meet with NMED to discuss the selection of target analytes for the Phase II investigation.

20. (Section 5.3)

An interface meter will be used to detect PSH that may be floating on the water table. The use of the interface meter is discussed in Sections 5.3 and 6.6 of the revised closure plan, and is consistent with EPA guidance documents.

21. (Section 6.1)

The list of analytical parameters and methods has been revised as requested.

22. (Section 6.2)

Detection limits will be determined by the analytical laboratory as described in the individual analytical methods references (EPA, 1986).

23. Interim Measures (Section 7.1)

Regarding the status of monitor well MW-1, Transwestern has received a letter from NMED dated January 3, 1995 authorizing the continued use of MW-1 as a hydrocarbon recovery well. Therefore, MW-1 will not be plugged and abandoned at this time.

24. Remedial Options (Section 7.3)

No response needed.

25. (Section 7.5)

Given the phased approach proposed for closure of the former impoundments, it is premature to discuss ground-water or soil cleanup criteria at this time. Therefore, references to cleanup criteria have been deleted from the closure plan. A risk assessment may indeed be performed following the collection of additional quantitative data regarding the distribution of hazardous constituents; however, this will not be proposed until a subsequent phase.

26. (Table 3.1)

The elevations of all existing monitor wells were determined in December 1994 by a licensed professional surveyor. These data are provided in Table 3-6 of the revised closure plan.

27. (All Tables)

For comparison with the analytical chemistry results, the New Mexico Water Quality Control Commission (NMWQCC) ground-water standards have been added to the relevant tables.

28. (Figure 3-5)

Pit 2 was incorrectly labeled as Pit 3. This error has been corrected in the revised closure plan.

29. (All Figures)

The correct locations of all monitor wells are shown on Figure 2-1 and subsequent figures. The locations of the wells were determined by a licensed professional surveyor in December 1994. These locations supersede all previous maps or well coordinates.

30. Appendix E

The laboratory results for ground-water samples collected from monitor well MW-2 have been added to Appendix E as requested.

31. Health & Safety Documentation

A site-specific health and safety plan prepared by DBS&A is being submitted with this list of responses to NMED comments. All DBS&A field personnel have received the requisite 40-hour health and safety training and annual updates, as required by OSHA regulations contained in 29 CFR 1910.120. In addition, DBS&A maintains a thorough medical monitoring program for all field personnel. Documentation of training for individual field staff is available upon request.