GW - 52

GENERAL CORRESPONDENCE

YEAR(S): 1994 - 1989

ENRON
OPERATIONS CORP.

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

December 20, 1994

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: Sampling Plan for Water Wells Within Two Miles of the Site
Transwestern Pipeline Company Roswell Compressor Station

Dear Ms. Hoditschek,

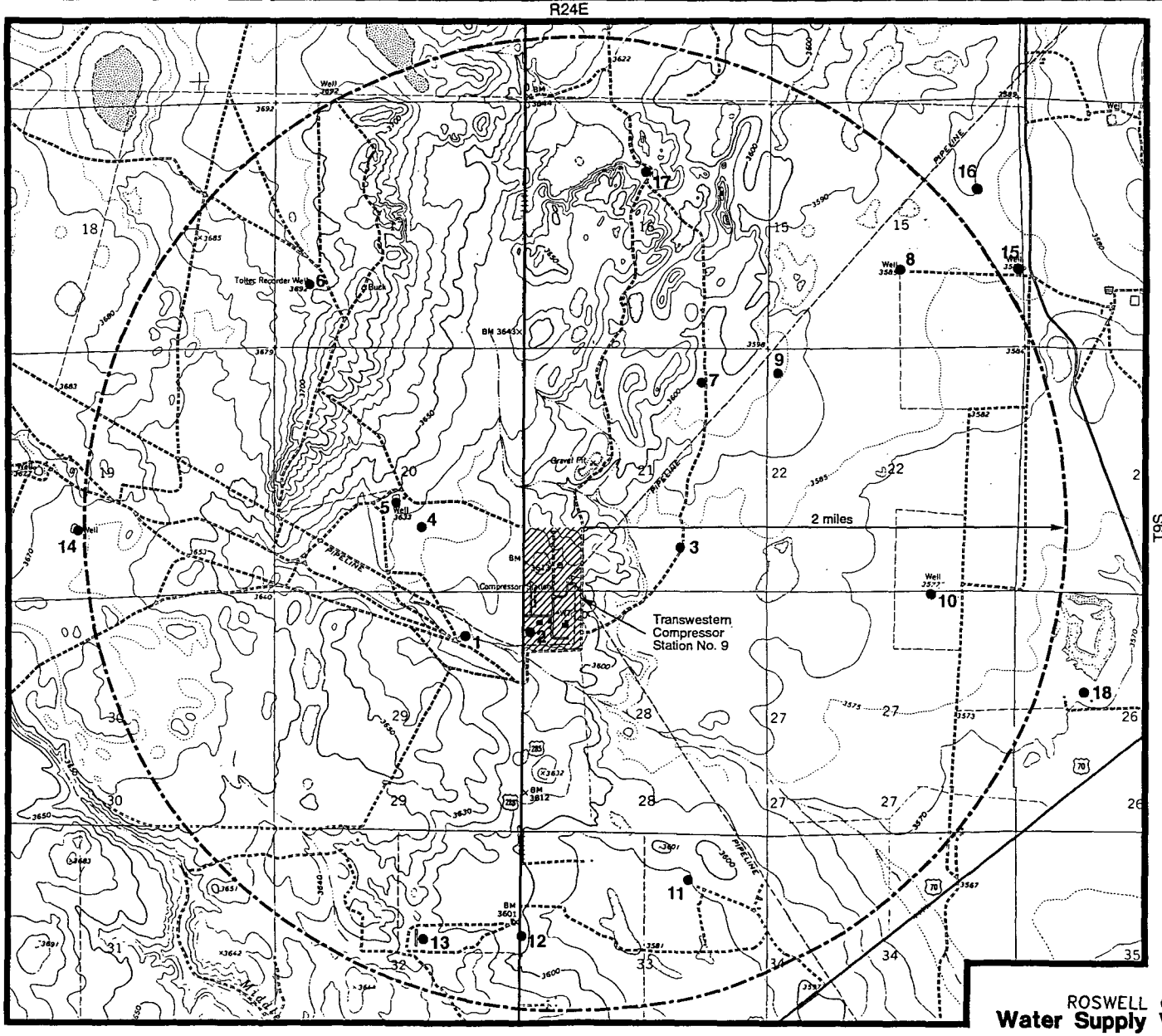
Transwestern Pipeline Company (TPC) has recently completed an effort to locate and characterize the existing conditions and current use of ground water production wells located within two miles of the Roswell Station. Efforts were concentrated on those wells closest to the site and those potentially downgradient (to the east). A location map and a summary of the information obtained are attached.

Wells indicated on the attached location map as #1, #2, #3, #5, #7, #8, #9, #10, #15, #16, and #18 were visually inspected. A GPS instrument was used to determine the precise location of these wells. Although the State Engineers Office records indicate that well #4 is located near the Roswell Station, no evidence of this well could be found other than the abandoned remnants of an irrigation ditch in the general vicinity. Well #17 was viewed from a distance and was verified to be active by a representative of the State Land Office.

The results of this effort indicate that there are three water wells of potential interest which could be sampled without considerable effort. The first is the on-site observation well completed in the San Andres formation and indicated on the attached location map as well #2. The second is an abandoned stock well located on private property in the general downgradient direction from the Roswell Station. This well is completed in the San Andres formation and is indicated as well #9 on the attached location map. The third is a well which supplies water for a gravel mining operation and is the closest production well to the site that is currently in use. This well is located on State of New Mexico property in the general upgradient direction from the Roswell Station. This well is completed in the San Andres Formation and is indicated as well #5 on the attached location map.

At this time, TPC will sample only the on-site observation well and the production well currently in use, wells #2 and #5, respectively. The primary objective for sampling well #5 is to obtain additional background ground water quality data for the San Andres formation aquifer. TPC does not propose to sample well #9 at this time because it is located on private property and would subject ENRON to a potential liability not commensurate with the expected value of the information to be gained from sampling this well.

The procedures for collecting ground water samples from wells #2 and #5 will follow the applicable Standard Operating Procedures (SOP) included in the closure plan previously submitted for the subject site and dated May 31, 1994. Ground water samples will be collected and submitted to a qualified lab for the analyses shown in Table 1.



Note: Well numbers refer to wells listed on Table 2-1.

N

0 2000'

ROSWELL COMPRESSOR STATION
Water Supply Well Location Map

DANIEL B. STEPHENS & ASSOCIATES, INC.
12-94 JN 4115

Figure 2-5

D:\4115\2-3WSW.DWG

Table 2-1. Water Supply Wells Located Within 2 Miles of Roswell Compressor Station No. 9

Well Number[1]	Latitude	Longitude	Well ID	Well Depth (ft)	Depth to Water (ft) / Year	Aquifer	Distance From Site (miles)	Date Drilled	Use	Status
1	333028	1043119	09S.24E.29.223313	NA	63 / 1961	San Andres Fm	0.66	NA	Livestock	Abandoned; plugged
2	333031	1043103	09S.24E.28.113132	352	65 / 1994	San Andres Fm	0.49	09/17/69	Observation	Abandoned; open
3	333050	1043025	09S.24E.21.43213	58	15 / 1937	Alluvial Fill	0.45	NA	Livestock	Abandoned; plugged
4	333053	1043134	09S.24E.20.413	NA	NA	San Andres Fm	0.63	NA	NA	Abandoned; not found
5	333059	1043135	09S.24E.20.32422	370	63 / 1948	San Andres Fm	0.73	NA	Industrial	In Use
6	333145	1043159	09S.24E.17.331222	208	119 / 1948	Artesia Group	1.54	NA	Observation	NA
7	333128	1043022	09S.24E.21.2124	NA	NA	NA	0.83	NA	Livestock	Abandoned; plugged
8	333149	1042931	09S.24E.15.41313	425	47 / 1961	San Andres Fm	1.72	03/18/59	Irrigation	In Use
9	333128	1043004	09S.24E.22.1113	386	281 / 1968	San Andres Fm	1.06	NA	Livestock	Abandoned; open
10	333041	1042924	09S.24E.27.21212	NA	NA	NA	1.50	NA	Irrigation	Not in use
11	332934	1043021	09S.24E.33.21443	510	53 / 1965	San Andres Fm	1.60	NA	Irrigation	NA
12	332927	1043106	09S.24E.32.242443	NA	43 / 1961	Artesia Group	1.66	NA	Livestock	Abandoned
13	332921	1043134	09S.24E.32.233324	116	72 / 1960	San Andres Fm	1.86	NA	Livestock	NA
14	333055	1043236	09S.24E.19.41331	550	126 / 1962	San Andres Fm	2.01	NA	Irrigation	NA
15	333151	1042903	09S.24E.15.42442	375	55 / 1959	San Andres Fm	2.08	12/15/58	Domestic	Abandoned; open
16	333207	1042914	09S.24E.15.24321	365	66 / 1966	San Andres Fm	2.12	11/15/65	Irrigation	Abandoned; has pump
17	333211	1043037	09S.24E.16.1422	NA	NA	NA	1.53	NA	Irrig/Stock	In Use
18	333021	1042845	09S.24E.26.1431	NA	NA	NA	2.15	NA	Domestic	In Use

Sources: USGS Ground-Water Site Inventory; field verification by Transwestern using GPS.

[1] Well numbers correspond to well locations shown on Figure 2-5. NA = Not available

Table 1. Ground water sample analysis for production wells #2 and #5.

Method	Compound Class/Analyte	Well #2	Well #5	Comment
8240	Volatile Organics	yes	yes	
8270	Semi-Volatile Organics	yes	no	not included for well #5 because prior experience at other TPC sites indicates that semi-volatile organic compounds will not be present at a distance from the source area without the presence of more mobile and prevalent volatile organics
8080	Organochlorine Pesticides and PCB's	yes	no	not included for well #5 because this compound class is highly immobile in the subsurface and could not reasonably be expected to have migrated the distance to well #5
8140	Organophosphorus Pesticides	no	no	not included for wells #2 or #5 because pesticides are not potential constituents of concern at this site
8150	Chlorinated Herbicides	no	no	not included for wells #2 or #5 because herbicides are not potential constituents of concern at this site
8280	Polychlorinated Dibenzo-P-Dioxins and Polychlorinated Dibenzo Furans	no	no	not included for wells #2 or #5 because these compounds are not potential constituents of concern at this site
6010	App. IX metals	yes	yes	
7470	Mercury	yes	yes	
9010	Cyanide	yes	yes	
9030	Sulfide	yes	yes	
160.1	Total Dissolved Solids	yes	yes	not an App. IX analyte
6010	Ca, K, Mg, Na, Cu, Fe, Mn, and Zn	yes	yes	not an App. IX analyte
310.1	Alkalinity	yes	yes	not an App. IX analyte
325.2	Chloride	yes	yes	not an App. IX analyte
353.2	Nitrite/Nitrate-N, Total	yes	yes	not an App. IX analyte
375.2	Sulfate	yes	yes	not an App. IX analyte

Notes:
1) yes/no - A ground water sample will/(will not) be analyzed by the method indicated.
2) All Appendix IX constituents can be detected by the first ten methods listed.

We believe it is important to include this information in the modified closure plan since this plan may be subject to public review and comment. In order to obtain analytical results in time to include in the modified closure plan, TPC has tentatively scheduled to collect the ground water samples on Thursday, December 22, 1994. 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

cp w/enclosures: Roger Anderson NMOCD Santa Fe, NM

ENRON
OPERATIONS CORP.

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

November 9, 1994

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: Extension of Time to Respond to the NOD dated September 28, 1994, and
Installation of an Upgradient Ground Water Monitor Well
Transwestern Pipeline Company Roswell Compressor Station

Dear Ms. Hoditschek,

Transwestern Pipeline Company (TPC) requests a seventy-five (75) day extension of time to respond to the Notice of Deficiency (NOD) issued by your office for the Closure Plan submitted by TPC for the former surface impoundments which were located at the TPC Roswell Compressor Station. The subject NOD was received by Larry Campbell, TPC Division Environmental Specialist, on October 3, 1994. The subject NOD required a thirty (30) day response from the date of receipt. Therefore, a seventy-five (75) day extension will require that TPC respond to the NOD on or before January 16, 1995.

As we had discussed in our meeting of November 1, 1994, TPC will submit to your office by January 16, 1995 a modified Closure Plan for the former surface impoundments which were located at the subject facility. The primary modifications to be made to the closure plan include:

- A phased approach soil assessment plan,
- A phased approach ground water assessment plan, and
- A soil and ground water sample analysis plan which will meet the criteria for a RCRA closure.

All other issues identified in the NOD will also be addressed within the modified Closure Plan or within a separate letter to your attention which will also be submitted on or before January 16, 1995. As a result of our meeting of November 1, 1994, we have already identified four issues which will be addressed separately from the modified Closure Plan. These issues and an anticipated response date is shown in Table 1 below:

Table 1. NOD issues to be addressed separately from the modified Closure Plan.

Issue to be Addressed	Anticipated Response Date
1. Installation of an upgradient monitor well in order to confirm the direction and gradient of ground water flow in the uppermost aquifer	with this letter
2. Status report for the interim corrective measures to remove separate phase hydrocarbon	11/18/94
3. Abandonment of the MW-1 recovery well	11/23/94
4. Sampling of the on-site regional aquifer monitor well and all other accessible water wells located within two (2) miles downgradient of the former surface impoundments	12/02/94

The objective of the first issue listed in Table 1 is to confirm the direction and gradient of ground water flow in the uppermost aquifer. This has been a significant concern of both the NMED and TPC due to the impact this issue has on the development of an acceptable Phase I ground water assessment plan. Therefore, in an attempt to resolve this issue prior to submittal of the modified Closure Plan, TPC will install one (1) upgradient (in the presumed upgradient direction) monitor well to the uppermost aquifer at the approximate location identified on the attached site diagram. The procedure and methods TPC will follow for the installation, development, and sampling of the upgradient well and for measurement of the static water level in selected on-site monitor and recovery wells is also attached.

At some point shortly following the completion of the newly installed monitor well, the location and elevation of each monitor well and recovery well located on-site will be determined by a certified professional surveyor. This information, combined with static water level measurements, should allow for an approximate determination of the direction and gradient of ground water flow in the uppermost aquifer. This information will also provide an accurate location of each of the existing on-site monitor and recovery wells relative to the facility boundaries and the former surface impoundments. All of this information would be presented and incorporated into the modified Closure Plan to be submitted.

If you have any questions regarding the request for an extension of time or the installation of an upgradient monitor well, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

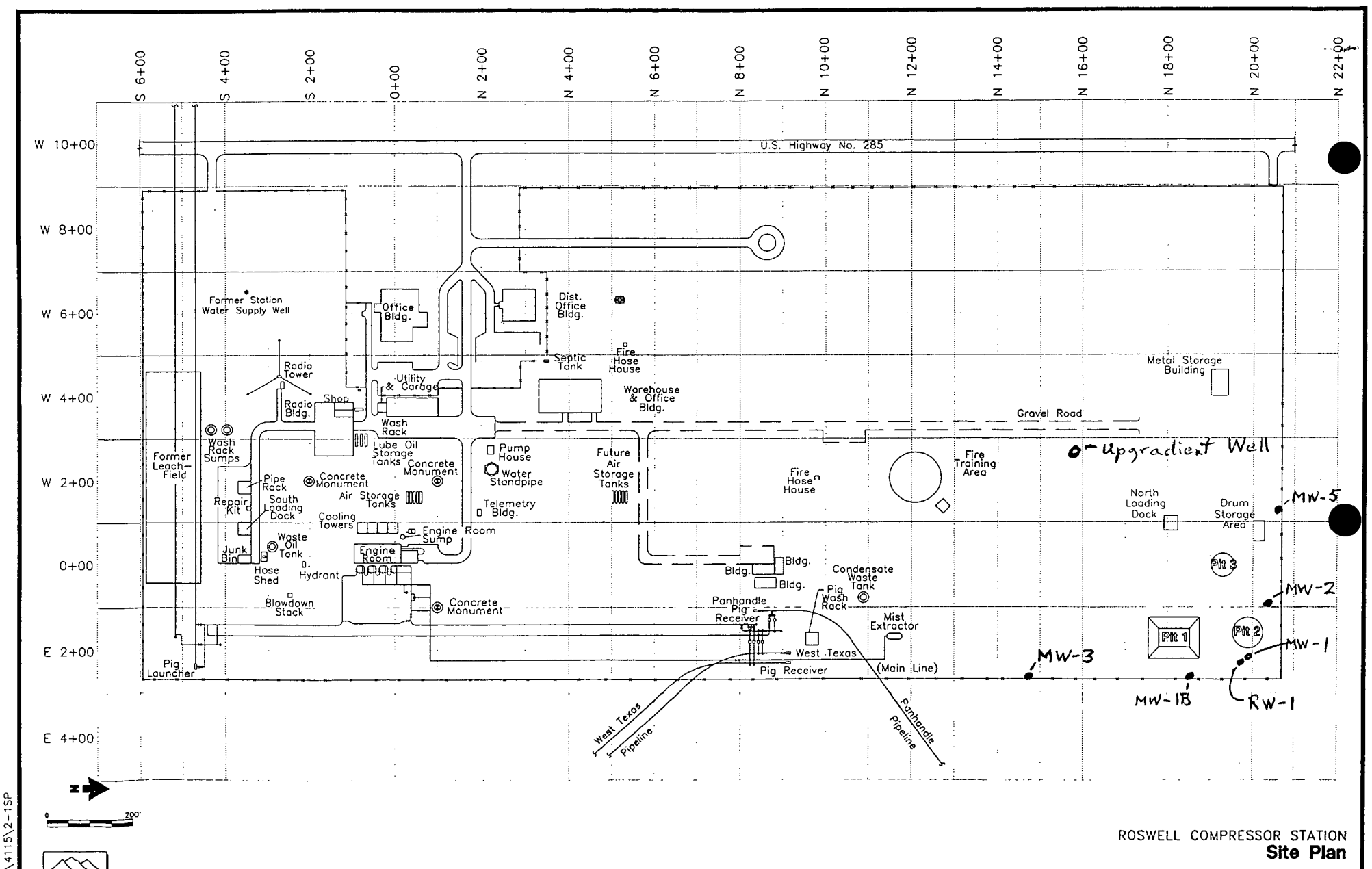
Sincerely,

Bill Kendrick

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

gcr/BK

cp w/enclosures: Roger Anderson NMOCD Santa Fe, NM



ROSWELL COMPRESSOR STATION
Site Plan

D\4115\2-1SP

DANIEL B. STEPHENS & ASSOCIATES, INC.

Procedure and Methods for the Installation of an Upgradient Ground Water Monitor Well at the TPC Roswell Compressor Station

1.0 Soil Boring Advancement and Soil Sample Collection and Analysis

TPC will contract with a licensed State of New Mexico water well driller to drill one soil boring to the top of the bedrock upon which the uppermost aquifer is perched (approximately 60 to 70 feet below ground surface). Soil samples will be collected from the boring with a split spoon sampler at every five (5) foot interval. Two samples will be collected from each five foot interval, one for field screening with a photoionization detector (PID) and the other for potential delivery to a laboratory for sample analysis. Upon termination of the soil boring at total depth, two soil samples will be selected for delivery to a laboratory, one from just above the ground water table and the other based upon the highest measured detection of volatile organic vapors as determined by field screening with the PID. Each sample will be analyzed for volatile organics by EPA Method 8240 and total petroleum hydrocarbons by EPA Method 418.1. The complete Appendix VIII constituents analysis will not be run due to the location of the soil boring which will be relatively distant from any known or suspected source of contamination. The purpose of the selected analyses is to confirm that the soil boring is in fact outside the immediate area of any potential contamination source.

2.0 Installation of a Two (2) Inch Diameter Monitor Well

A two (2) inch monitor well will be installed through the hollow stem augers following the completion of the soil boring. The monitor well will be constructed of two (2) inch diameter schedule 40 PVC pipe and will include, in ascending order, a bottom plug, fifteen (15) feet of flush-threaded 0.01-inch machine-slotted PVC screen, and blank casing from the top of the screen to approximately level with the ground surface. The well casing will be lowered into the borehole until the bottom of the screened interval is approximately ten (10) feet below the ground water table (or at the bottom of the boring if there is less than ten feet of saturated interval). A sandpack consisting of #10-20 mesh silica sand will be poured down the annulus of the auger in three (3) foot lifts. After each three (3) foot interval is filled, the augers will be pulled up approximately the same distance. This procedure will be repeated until the sand pack level is approximately two (2) feet above the top of the screened section. The annular space above the sand pack will then be filled with a minimum two (2) foot pelletized bentonite seal, which will be hydrated with distilled water. The remaining annular space will be filled with a cement/bentonite slurry grout consisting of approximately three (3) percent bentonite by weight. The top of the well casing will be protected by a PVC cap, and the exposed casing will be protected by a locking steel vault. A six (6) inch thick concrete pad will then be constructed around the vault.

3.0 Well Development and Ground Water Sample Collection and Analysis

The newly installed monitor well will be developed by a sequence of surging and pumping and/or bailing. Development will be considered complete when the water becomes relatively clear. Ground water samples will be collected from the newly installed well 12-24 hours after well development is complete. Prior to sample collection, the well will be purged a minimum of three (3) casing volumes in order to remove standing/stagnant water and to ensure the collection of representative samples. Following purging, ground water samples will be collected as soon as possible. All samples will be collected in precooled, acidified, certified-clean 40-mL glass vials with septum caps supplied by the laboratory. Samples will be delivered to the laboratory for analysis for volatile organics by EPA Method 8240 and total petroleum hydrocarbons by EPA Method 418.1. The complete Appendix IX ground water monitoring list analyses will not be run at this time since this will be included in the Phase I ground water assessment plan. The primary purpose of the selected analyses is to confirm that the monitor well is in fact outside and upgradient of any potential contamination source.

4.0 Measurement of Fluid Levels in Selected On-Site Monitor and Recovery Wells

Immediately prior to collection of ground water samples from the newly installed monitor well, the static water level will be measured to the nearest 0.01 foot using an electrical water level sounder. Immediately following collection of ground water samples from the newly installed monitor well, the static water level will be measured in monitor wells MW-3 and MW-5 to the nearest 0.01 foot using an electrical water level sounder. The hydrocarbon/water interface and the static water level will be measured in recovery wells MW-1B and MW-2 to the nearest 0.01 foot using an electrical interface probe. The recovery pumps in recovery wells MW-1B and MW-2 will be shut off at least 24 hours prior to taking the level measurements. The pumps in recovery wells MW-1 and RW-1 will not be shut off during this data collection event.

bc w/enclosures:	M. Terraso	Houston, TX
	L. Kunkel	Roswell, NM
	L. Campbell	Roswell, NM
	L. Soldano	Houston, TX
	G. Robinson	Houston, TX

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

BRUCE KING
GOVERNOR

RON CURRY
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 19, 1994

Mr. Larry Campbell
Division Environmental Specialist
Transwestern (**TW**) Pipeline Company
Roswell, New Mexico 88202-1717

Dear Mr. Campbell:

This letter serves as notification that the Hazardous and Radioactive Materials Bureau (**HRMB**) will be conducting a RCRA Facility Assessment (**RFA**) at Transwestern Pipeline Company's Roswell Compressor Station during the months of July and August 1994. This letter replaces HRMB's July 6, 1994 notification letter. The RFA will include a preliminary review (**PR**) of existing files and information followed by a visual site inspection (**VSI**) during which field sampling may be conducted.

HRMB would like to conduct the VSI on August 3-4, 1994 if these dates are acceptable to TW. A facility representative will need to be available to provide facility documents, answer general questions, and conduct a site tour.

Should you have any questions concerning this matter please contact Ms. Teri Davis of my staff at 827-4308.

Sincerely,

Ronald A. Kern, Program Manager
RCRA Technical Compliance Program

cc: Barbara Hoditschek, HRMB
Teri Davis, HRMB
Cornelius Amindias, HRMB
Marc Sides, EPA
FILE TW Red94
Roger Anderson, OCD
John Hoover, District IV

ENRON
OPERATIONS CORP.

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

May 31, 1994

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 Three Former Surface Impoundments
Transwestern Pipeline Company Compressor Station No. 9, Roswell, New Mexico

Dear Ms. Hoditschek,

Transwestern Pipeline Company (TPC) submits the enclosed closure plan for three former surface impoundments located at the Roswell Compressor Station. 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 consultant, George C. Robinson, P.E., Cypress Engineering Services.

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. However, should the NMED find a deficiency in the enclosed closure plan or find that an issue needs clarification, please bring this to my attention and we will resolve the issue as soon as possible. TPC is fully committed to the preparation and implementation of an administratively complete and technically sound closure plan.

It should be noted that TPC continues to consider alternative regulatory avenues for closure and remediation of this site. As we discussed in our meeting last April, impoundments which were used to store pipeline liquids have historically been regulated by the NMOCD. Furthermore, the compounds which have triggered RCRA involvement at this site are present in concentrations below USEPA proposed action levels for RCRA closures (proposed Subpart S, 7/27/90). Nevertheless, TPC is committed to work with the NMED and/or any other regulatory agency to achieve closure of the former impoundments at the Roswell Station site.

As requested, three hard copies of the closure plan and one copy on disk in WordPerfect 5.2 format are enclosed. 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

Bill Kendrick
Projects Group Manager
EOC Environmental Affairs

gcr/BK

cp w/ enclosures: Roger Anderson NMOCD Santa Fe, NM

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

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SENDER:
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Mr. Larry Campbell
Transwestern Pipeline Co
PO Box 1717
Roswell, NM 88202-1717

4a. Article Number
P-111-334-282

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☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery
11-23-93

5. Signature (Addressee)
Frank Smith

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)

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

October 25, 1993

Mr. William C. Olson
Environmental Bureau
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

Re: Product Recovery Wells at Roswell Compressor Station
Discharge Plan GW-52

Dear Mr. Olson:

In reference to your agency's letter correspondence concerning the recovery wells at the Roswell Compressor Station, presented below are responses which address the three (3) concerns you identified Each response follows the numbered questions in your letter:

1. The liquids which are pumped from the underlying contaminated perched zone and aquifer are collected onsite for a period not to exceed 90 days and are manifested as a hazardous waste. Rollins Environmental Services then transports the waste to Deer Park, Texas for incineration.

2. The inspection ports constructed in the secondary containment piping is used to visually identify and potential leaks which may occur in the product recovery tubing. The inspection ports are visually checked approximately every two (2) weeks to determine the integrity of the recovery tubing.

3. The existing tank which is used to store the liquids generated during the recovery process is an above ground steel, horizontal tank of approximately 4000 gallons. Plans are currently underway to switch to an above ground fiberglass tank with a containment also constructed of fiberglass. The containment will comply with the OCD's requirement of storage of 1.33.

If you may require any additional information, please contact me at 625-8022.

Sincerely,

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Rich Jolly
Raymond Hollon
file

Ed Horst, NMED Hazardous and Radioactive Material Bureau

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

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

September 22, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-390

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

RE: PRODUCT RECOVERY WELLS
TRANSWESTERN ROSWELL COMPRESSOR STATION
DISCHARGE PLAN GW-52
CHAVES COUNTY, NEW MEXICO

Dear Mr. Campbell:

The New Mexico Oil Conservation Division (OCD) is in receipt of Transwestern Pipeline Company's September 7, 1993 correspondence informing OCD of Transwestern's intent to install product recovery pumps in three monitor wells at their Roswell Compressor Station. The product recovery is being performed as part of a RCRA cleanup of contaminated ground water at the facility.

In order to incorporate the fluid handling from this system into the facility discharge plan, the OCD has the following questions and requests for information on the above referenced document:

1. Please provide OCD with information regarding the disposition of fluids generated from the product recovery system.

2. The document indicates that piping for the product recovery lines is to be located below ground inside a containment pipe with inspection ports. Is this system intended to be used for the detection of leaks from the product recovery tubing? If so, please provide OCD with an inspection schedule for the detection of leaks in the tubing.

3. Is the proposed tank for storage of recovered fluids to be located above ground or below grade? If the tank is to installed on the surface, the OCD requires that the tank be

bermed to contain 1 and 1/3 times the volume of the tank. If the tank is to be installed below grade, the OCD requires that the tank have secondary containment and a method of leak detection.

Receipt of the above information will allow OCD to complete a review of your product recovery system. If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office
Ed Horst, NMED Hazardous & Radioactive Materials Bureau

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

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

September 7, 1993

Mr. Edward Horst
Program Manager
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
525 Camino de los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

Enclosed find a copy of the Brown & Root letter report describing remediation activities at Transwestern Pipeline Company's Roswell, New Mexico Compressor Station. This report presents additional remediation activities performed by Transwestern. This letter describes the installation of three (3) additional product recovery wells to remove the contaminated liquids from the upper perched zone and lower water zone.

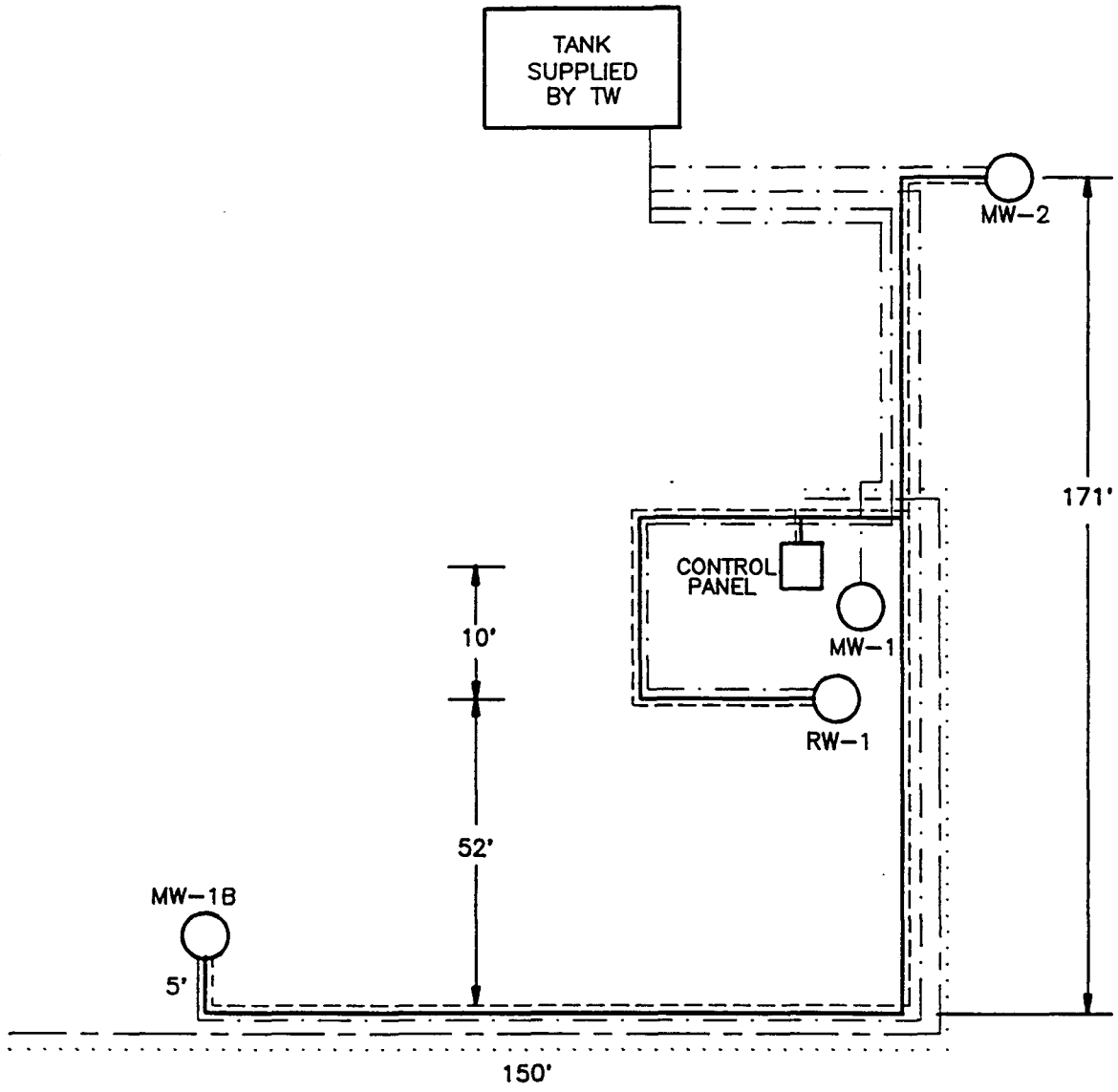
Should you have concerns or require additional information, contact our Roswell Technical Operations at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Lou Soldano
Raymond Hollon
Roger Anderson Oil Conservation Division
file



LEGEND		WELL	DEPTH TO PRODUCT/REMOVAL PUMPS
———	– PUMP AIR LINE	MW-1B	60'
- - - - - - -	– PUMP CONTROL LINE	MW-2	60'
— · — · —	– PRODUCT RECOVERY LINE	RW-1	40'
—— – ——	– TW SUPPLIED AIR LINE		
. . . . .	– TW SUPPLIED ELECTRIC LINE		

FIGURE 1

ROSWELL SYSTEM SCHEMATIC
(N.T.S.)

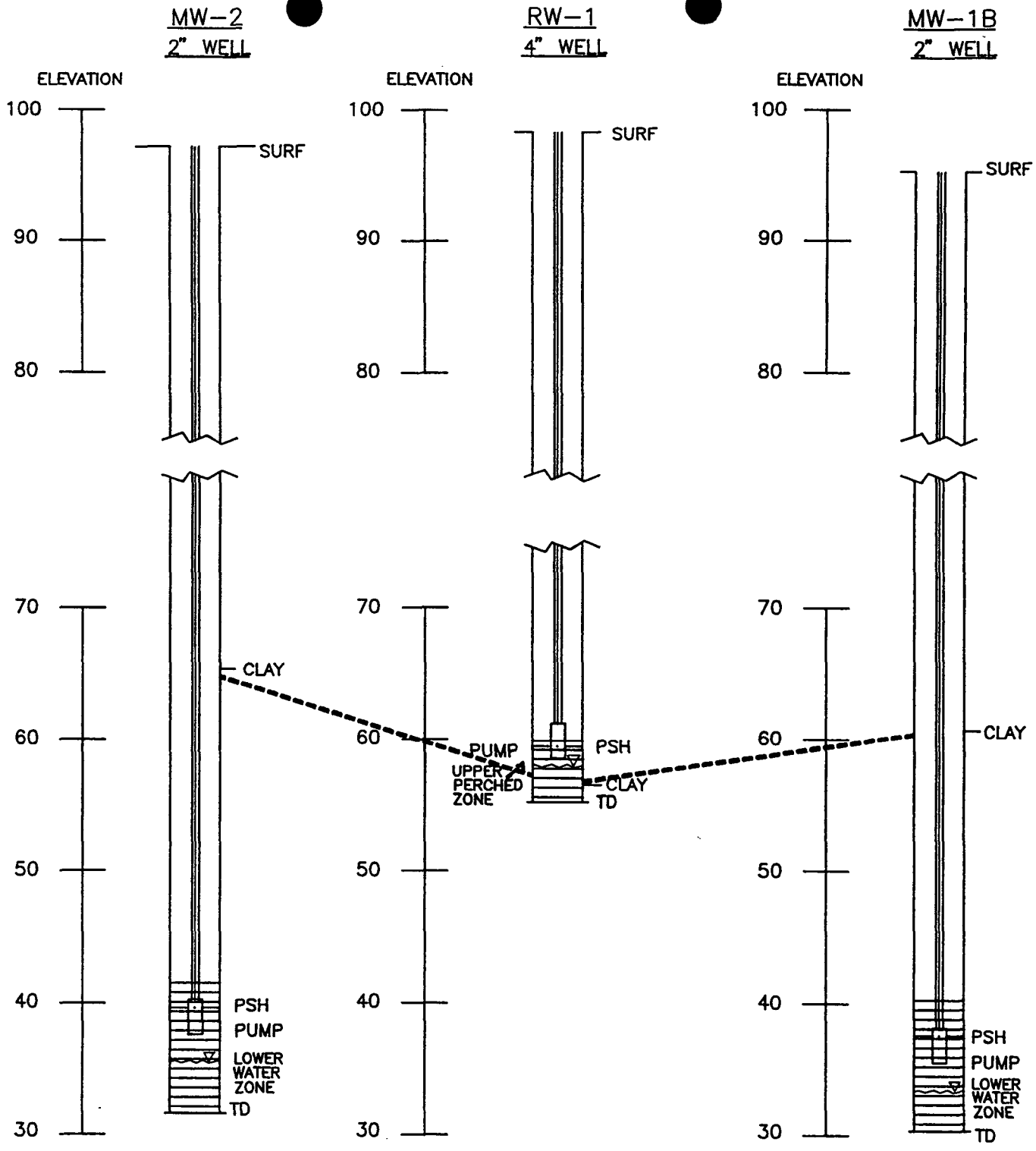


FIGURE 2

DRAWN BY:	D. GROSSHANDLER
DATE:	08/12/93
ENGINEER:	S. RICHARD
DATE:	08/12/93
CAD DWG. NO:	WELL1.DWG

ROSWELL PUMP INSTALLATION DIAGRAM
ROSWELL COMPRESSOR STATION NO. 9
TRANSWESTERN PIPELINE COMPANY

SCALE: NONE | DWG. NO. 8T88-BA | REV. 0

Brown & Root Environmental
A Halliburton Company

Brown & Root Environmental

10200 Bellaire Boulevard (77072-5299)
Post Office Box 4574
Houston, TX 77210-4574

August 23, 1993

Mr. Larry Campbell
Transwestern Pipeline Company
6381 N. Main St.
Roswell, NM 88201

RE: Phase Separated Hydrocarbon Recovery System Installation Transwestern Pipeline Company Compressor No. 9 - Roswell, New Mexico

Dear Mr. Campbell:

Brown and Root Environmental (B&R Environmental) completed the installation of a Phase Separated Hydrocarbon (PSH) recovery system at the Transwestern Pipeline Company's (Transwestern) Compressor Station No. 9 located in Roswell, New Mexico on July 1, 1993. Figure 1 shows the layout of the recovery system.

Transwestern contracted trench excavation, air and electric lines placement and stub-out pad construction. Transwestern supplied air was connected to a receiver/filter tank which was positioned on the stub-out pad. Transwestern supplied an air manifold which B&R Environmental installed on the receiver/filter air tank. Transwestern also emplaced the product recovery tubing into containment pipes having multiple inspection ports.

B&R Environmental installed the pumping air, control and recovery lines in the excavated trench. The pumping air and air logic lines were installed in 2" PVC electrical conduit. One half inch PVC PSH recovery lines were installed and connected to the recovery pumps. Each recovery well was separately piped to the product storage tank.

Three PSH recovery pumps were installed in wells RW-1, MW-1B, and MW-2. The pump in RW-1 was installed at a depth of 40 feet below the top of casing in the upper perched zone. The pumps in MW-2 and MW-1B were installed at a depth of 60 feet below the top of casing in a lower water zone. All three of the pumps were installed above the PSH groundwater interface to minimize recovery of groundwater. The pump installation diagram is included as Figure 2.

The recovery equipment installed included three (3) Marschalk Aquarius II Gas Displacement Pumps with three (3) Local Controllers, for low submergence pump operation, and a Marschalk 99000 Main Logic Controller.

The rate of PSH recovery varies due to the inflow from the surrounding geologic strata at the different locations of the wells and the volume of PSH in the area of the well screen. The recovery pumps were set at a rate of recovery based on the inflow of PSH into the well. The rate of recovery is from 0.01 (2 wells) to 0.03 (2 wells) gpm for an approximate average recovery rate of 0.02 gpm. Using the average recovery rate of 0.02 gpm, the total system recovery on a daily basis will be approximately 100 gallons/day.

Sincerely yours,

BROWN & ROOT ENVIRONMENTAL

Mark C. Spencer
Remediation Specialist

MCS/rk

c: S. Richard - Project Manager
M. Meenan - Department Manager
GES File 8T88.DA 3.1.2

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

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

June 11, 1993

Mr. Frates Seelingson
4040 Broadway Suite 510
San Antonio, Texas 78209

Dear Mr. Seelingson:

By this letter, Transwestern Pipeline Company is providing notification that remediation operations are currently in progress to formally close an "out of service" surface impoundment located at the Roswell Compressor Station. This impoundment facility is located in the following coordinates: SE 1/4 of section 21, T. 9 S., R. 24 E. This notification of remediation activity applies to all parties which have surface ownership on property or lands which exist within a one mile radius of the above legal description. As a point of reference, the location of this surface impoundment is approximately .6 miles south of your property located in section 17, T. 9 S., R. 24 E., Chaves County, New Mexico.

Past operating practices by Transwestern at this surface impoundment has resulted in the presence offsite of very small concentrations of organic constituents in the water table aquifer. Although the "plume" of targeted constituents has not been precisely determined, sufficient data has been collected to conclude that the organics are very localized in extent and not widely distributed. In addition, the hydrologic conditions underlying the impoundment trend toward the south and east, strongly confirming that there is no adverse impact to the regional groundwater underlying the land in your parcel.

Transwestern is working closely with the Oil Conservation Division and the Hazardous and Radioactive Materials Bureau of the Environmental Department in New Mexico to remove the low levels of organic parameters present in the groundwater, and we expect closure of this site in a reasonably short time period. Our Company is voluntarily contacting all landowners and apprising them of present environmental conditions.

Should you have any additional concerns or questions concerning this matter, contact our Roswell Technical Environmental Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Rich Jolly
Lou Soldano Enron Legal
Ed Horst HRMB
Roger Anderson OCD
file

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

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

June 11, 1993

Commissioner of Public Lands
P.O. Box 1148
Santa Fe, New Mexico 87504-1148

Dear Commissioner:

By this letter, Transwestern Pipeline Company is providing notification that remediation operations are currently in progress to formally close an "out of service" surface impoundment located at the Roswell Compressor Station. This impoundment facility is located in the following coordinates: SE 1/4 of section 21, T. 9 S., R. 24 E. This notification of remediation activity applies to all parties which have surface ownership on property or lands which exist within a one mile radius of the above legal description. As a point of reference, the location of this surface impoundment is contiguously surrounded on the west, north and east by lands under the administration of the State of New Mexico. Transwestern Pipeline owns section 28, which is the parcel immediately south of section 21.

Past operating practices by Transwestern at this surface impoundment has resulted in the presence offsite of very small concentrations of organic constituents in the water table aquifer. Although the "plume" of targeted constituents has not been precisely determined, sufficient data has been collected to conclude that the organics are very localized in extent and not widely distributed.

Transwestern is working closely with the Oil Conservation Division and the Hazardous and Radioactive Materials Bureau of the Environmental Department in New Mexico to remove the low levels of organic parameters present in the groundwater, and we expect closure of this site in a reasonably short time period. Our Company is voluntarily contacting all landowners and appropriate state agencies and apprising them of present environmental conditions.

Should you have any additional concerns or questions concerning this matter, contact our Roswell Technical Environmental Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Rich Jolly
Lou Soldano Enron Legal
Ed Horst HRMB
Roger Anderson OCD
file

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

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

April 7, 1993

Ms. Barbara Hoditschek
Hazardous and Radioactive Bureau
New Mexico Environmental Department
1190 St. Francis Drive
Santa Fe, New Mexico 87502

Dear Ms. Hoditschek:

In reference to your February 17, 1993 correspondence concerning comments on the RCRA Part A application which was submitted by Transwestern Pipeline Company, enclosed find an amended Part A application. In addition, presented below are responses to the comments which your agency addressed in that letter. Identification and response for each comment has followed the numerical sequence of your attachment.

1. The term "scrubbed" refers to a process whereby naturally occurring liquids which are entrained in the natural gas are removed by a vessel referred to as a scrubber. The velocity and path of the gas as it passes through this vessel allows separation of the liquids from the gas. This is not considered a hazardous waste treatment. The process is designed only to remove liquids which will reduce efficiency of the gas as it travels in the pipeline.

2a. The liquid content which is associated with the gas is variable. In addition, the design and operation of the "scrubbers" are such that they automatically discharge for collection at irregular time intervals. As such, there was no way to record the liquid volumes which were directed into the surface impoundment. Similarly, records were not kept of the quantities and types of other solid and liquid wastes which were placed into the impoundment during the period of operation from approximately August of 1960 until June of 1986.

2b. During the 26 year operation, hazardous and non hazardous wastes were placed into the surface impoundment. The impoundment dimensions were approximately 20'x 20'x 15'. During a subsurface investigation of the area it was determined that liquids which were placed into the impoundment had vertically migrated into the subsurface soil layers. Gross calculations for the volume of the underlying liquids

are presently unknown. Transwestern is completing additional studies to more accurately calculate the volume of contaminated liquids present, and the plume of contamination which occurs.

2c. A more accurate estimate of the annual quantity of wastes which entered the surface impoundment is not available as operating records were not kept for volumes of materials which were disposed of in the surface impoundment.

2d. Upon backfilling the surface impoundment in June of 1986, there have been no hazardous or non hazardous wastes placed into this feature. For future reference, this impoundment will not receive solid or liquids wastes of any type.

3a. Enclosed find a facility map entitled, "WASTE STREAMS & PROCESS CODES" which presents the legal description and boundaries of the Roswell Compressor Station.

3b. The location of each intake and discharge structure is provided on the facility map. Serial numbers for each structure were not assigned and are therefore not applicable.

3c. Transwestern Pipeline Company occasionally collects materials which are hazardous under Subtitle C. These liquids are collected into a dedicated tank, and removed as per test results of the liquids. The collection and removal of the liquids is not a part of the surface impoundment closure.

3d. The location of all processes listed in Item XII of the part A application are presented on the facility map.

3e. There are no injection wells present at this facility.

3f. Only one surface water body is present within 1/4 mile of the facility and is identified on the attached topographic map. This feature, is a livestock watering pond. There are no springs or water wells which are present with 1/4 mile of the facility.

4. A revised drawing of the facility is presented on the facility map.

4a. The drawing is legible as per your request.

4b. The areas occupied by all storage, treatment, or disposal ares relevant to the surface impoundment information are identified on the attached map.

4c. The name of each operation associated with the impoundment activity is presented on the facility map.

4d. The only area of past or prior storage, treatment, or disposal of hazardous wastes is the backfilled impoundment.

4e. The approximate dimensions or the property boundaries and dimensions of the surface impoundment are provided on the facility map.

5. Accompanying this submittal are photographs which depict the location of the backfilled surface impoundment area. In addition, photographs are included of the waste streams which may have contributed to the hazardous conditions of the impoundment. The process codes which are identified on the facility map are also presented on the photographs.

I hope this information is suitable for your needs. Should you require any additional information, contact our Roswell Technical Operations at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwian w/o attachments
Rich Jolly
Lou Soldano
Roger Anderson
file

Enron Legal
OCD

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

BRUCE KING
GOVERNOR

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

April 6, 1993

E.W. Sanders, Vice President
Transwestern Pipeline Company
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: Extension to Submit Closure Plan

Dear Mr. Sanders:

On March 12, 1993, the Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) received a written request from Louis P. Soldano of Transwestern Pipeline Company (TWP) to extend the date to file a closure plan with the HRMB from May 1, 1993, until July 1, 1993. The extension was requested because additional time is needed by TWP to complete the current data gathering program and to evaluate the information so that an appropriate closure plan and, if necessary, post closure plan may be prepared.

The HRMB hereby grants the extension as requested for submitting the closure and post closure plans until July 1, 1993. The HRMB expects that the additional time will allow TWP to submit a comprehensive plan that will contain adequate regulatory and technical information for the HRMB to process a closure plan approval decision without the need for requesting additional information from TWP. TWP will be subject to appropriate enforcement or other action to require compliance if the closure plan filing deadline is missed.

Please contact Marc Sides of my staff at (505) 827-4308 if you have any questions.

Sincerely yours,

Barbara Hoditschek

Barbara Hoditschek, RCRA Permit Program Manager
Hazardous and Radioactive Materials Bureau

cc: David Neleigh, EPA
Louis P. Soldano, TWP
Larry Campbell, TWP
Roger Anderson, OCD
Steve Alexander, HRMB
Marc Sides, HRMB
File - Red

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

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

March 19, 1993

Mr. Edward Horst
New Mexico Environmental Department
525 Camino de Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

As per our meeting on December 15, 1992, enclosed find the proposal and contractor selected by Transwestern Pipeline Company to perform the health based risk assessment for vadose zone soils of the abandoned surface impoundment at Station 9.

This submittal completes the requirements of Item 4 as stated in our December 10, 1992 correspondence to your agency.

Should you require any additional information, contact our Roswell Technical Operations at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain w/o attachments
Rich Jolly " "
Lou Soldano " "
Roger Anderson " "
file

ENRON
Transwestern Pipeline Company
P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

March 10, 1993

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Barbara Hoditschek
RCRA Permit Program Manager
Hazardous and Radioactive Materials Bureau
State of New Mexico
Environment Department
Harold Runnels Building
1190 St. Francis drive
P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Ms. Hoditschek:

By this letter Transwestern Pipeline Company ("Transwestern") is requesting a sixty (60) day extension on the department's request for a closure plan for the Roswell Compressor Station. The sixty (60) day extension would allow Transwestern to file a closure plan by July 1, 1993. In addition Transwestern requests additional time to file a post-closure plan. As you are aware this site was not the type of facility contemplated by the regulations. It was a site used for the retrieval of pipeline liquids since the early 1960's. At some point in time non-exempt hazardous constituents were commingled with the exempt wastes. Since this is a remediation activity and not a true TSD facility Transwestern requests the additional time to complete the current data gathering program and to evaluate the information so that an appropriate closure plan and, if necessary, post closure plan may be prepared. This extension will allow Transwestern to prepare a relevant plan and minimize the amount of the agency's time that would be required to review an initial plan which almost certainly will need to be revised.

If you have any questions, please call me at (713) 853-7237.

Very truly yours,

Louis P. Soldano
Senior Counsel

cc: Larry Campbell
Rodger Anderson, OCD

letter/newmex.1

3/2/93 ENRON/OCD/ED Haz Waste Roswell Station Meeting 9:00 am

see attendance sheets

discuss ENRON part A application & ED 2/17/93 response letter (see handout 1)

NMED looking at truncated Part B for closure but not fullblown Part B

ENRON will request extension of time schedule of approx 60 days from May 1, 1993 for closure plan. Reason - will be drilling additional MW's, in mid April won't have results by then to incorporate in plan.

When is done or when to stop pumping, what is empty

3/2/93 ENRON/OCD/EP Roswell Station Meeting

NAME	DEPT / AGENCY	PHONE #
Louis Soldano	ATTORNEY - ENRON	713/853-7237
Marc Sides	HRMB Permits Program	505/827-4308
Larry Campbell	Transwestern Pipeline	505 624-0353
Bill Olson	OCD	505 827-5885
Susan McMichael	Attorney - NMED	505/827-2990
Steve Alexander	HRMB - NMED	827-4313
Roger Anderson	NMOCD	827-5812
Rich Jolly	Dist. Supervisor - TW	625-8095
Barbara Hoditschek	HRMB - NMED	827-4308

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

BRUCE KING
GOVERNOR

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

3/2/93
ENRON/OCD/ED meeting

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 17, 1993

Larry Campbell
Compliance Environmentalist
Transwestern Pipeline Company
Technical Operations
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: Closure Plan Request and Part A Application Comments

Dear Mr. Campbell:

In accordance with the New Mexico Hazardous Waste Management Regulations (HWMR-7) Part VI, Section 40 CFR 265.112(a), the owner or operator of a hazardous waste management facility must have a written closure plan by May 1, 1981 and, until final closure is certified in accordance with HWMR-7, Part VI, Section 40 CFR 265.115, a copy of the most current plan must be furnished to the Secretary of the NMED upon request, including request by mail. On behalf of the Secretary of the NMED, the HRMB is requesting a copy of your closure plan for the Roswell Compressor Station.

The plan must address all the requirements of HWMR-7, Part VI, Section 40 CFR 265.110 through 265.116. You must submit the closure plan to Barbara Hoditschek, RCRA Permit Program Manager of the HRMB by May 1, 1993. The information and reports generated by the items listed in your December 15, 1992, letter to Edward Horst of the HRMB may be used in developing the formal closure plan.

Additionally, if the unit is to be closed as a landfill, you must have a post-closure plan. Please submit a post-closure plan for the Roswell Compressor Station hazardous waste management unit by May 1, 1993, if the unit will be closed in-place with hazardous wastes or hazardous waste constituents above health based concentration levels. Post-closure plans must meet the requirements of HWMR-7, Part VI, Section 40 CFR 265.117 through 265.120.

Enclosed are our comments on the Part A application for a disposal surface impoundment Transwestern Pipeline Company submitted on January 5, 1993. Please submit a new or amended Part A application which addresses these comments within 30 days of your receipt of this letter.

Please contact me or Marc Sides of the HRMB RCRA Permit Program at (505) 827-4308 if you have any questions.

Sincerely,

Barbara Hoditschek

Barbara Hoditschek, RCRA Permit Program Manager
Hazardous and Radioactive Materials Bureau

Enclosure

cc: Barbara Hoditschek, HRMB
Marc Sides, HRMB
Edward Horst, HRMB
Steve Alexander, HRMB
David Neleigh, EPA Region 6, (6H-PN)

DEFICIENCY COMMENTS

Part A Application for the
Transwestern Pipeline Roswell Compressor Station
dated December 16, 1992

1. Section XI., Page 5 of 7: Please clarify what is meant by "scrubbed" in this section. Is this treatment of hazardous waste?

2. Section XIV., Page 6 of 7: This Section needs to clarify the annual quantity of waste received by the unit as it relates to the unit's capacity described in Section XII of the Part A Application as follows:

    A. Include a narrative explanation in Section XIV estimating the quantity of waste received each year for each waste code and specify the number of years that the unit received the waste.

    B. Explain the reasons for using a 3,061,487 gallon surface impoundment to receive the relatively small amount of hazarous wastes listed in Section XIV. (e.g. did the unit received both hazardous and nonhazardous waste?)

    C. Please estimate the annual quantity more accurately than "< 10 K".

    D. Also include a statement in Section XIV that no hazardous wastes are currently being placed in the unit or will be placed in the unit in the future.

3. Section XV., Page 7 of 7: Enclosed is the topographic map that you submitted with the Part A Application. The map needs to be revised as follows:

    A. The legal boundaries of the facility;

    B. The location and serial number of each of your intake and discharge structures, if applicable;

    C. All hazardous waste management facilities;

    D. Location of all processes listed in Item XII of the Part A Application listed by process code;

    E. Each well where you inject fluids underground; and

    F. All springs and surface water bodies in the area, plus all drinking water wells within 1/4 mile of the

facility which are identified in the public record or otherwise known to you.

If an intake or discharge structure, hazardous waste disposal site, or injection well associated with the facility is located more than one mile from the plant, include it on a map, if possible. If not, attach additional sheets describibg the location of the structure, disposal site, or well, and identify the U.S. Geological Survey (or other) maps corresponding to the location. On each map, include the map scale, a meridian arrow showing north, and latitude and longitude at the nearest whole second. On all maps of rivers, show the direction of the current.

You may trace your map from a geological survey chart, or other map meeting the above specifications. If you do, your map should bear a note showing the number or title of the map or chart it was traced from. Include the names of nearby towns, water bodies, and other prominent points.

4. Section XVI., Page 7 of 7: Attached is the facility drawing that you submitted with the Part A Application. Please revise the drawing as described below: This drawing must show the general layout of the facility on a 8 1/2" by 11" sheet of paper. This drawing should show:

   A. The drawing must be legible;

   B. The areas occupied by all storage, treatment, or disposal operations;

   C. The name of each operation (example - pit, surface impoundment, drum storage area, etc.);

   D. Areas of past storage, treatment, or disposal operations; and

   E. The approximate dimensions of the property boundaries and all storage, treatment, and disposal areas.

5. Section XVII., Page 7 of 7: All existing facilities must include photographs that clearly delineate all existing structures; all existing areas for storing, treating, or disposing of hazardous waste; all known sites of future storage, treatment, or disposal operations. Photographs may be color or black and white, ground-level or aerial. Indicate the date the photograph was taken on the back of each photograph. Use the hazardous waste process codes to indicate the location of all storage, treatment, or disposal areas.

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

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

Steve -
Ed -
FYI

February 19, 1993

Mr. Edward Horst
New Mexico Environmental Department
525 Camino de Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

In compliance with Item 3 of Transwestern's December 15, 1992 letter to the Environmental Department (ED), enclosed find the proposal of the contractor which was selected to perform the monitor well installations at Compressor Station No. 9, Roswell.

Included with this proposal are the location sites of the proposed well sites, well completion information and other pertinent information relevant to this regional groundwater investigation.

Should you require any additional information, contact our Roswell Technical Operations Office at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

RECEIVED
FEB 24 1993

xc: Doc Alpers w/o attachments
Rich Jolly "
Lou Soldano "
file

Brown & Root Environmental

10200 Bellaire Boulevard (77072-5299)
Post Office Box 4574
Houston, TX 77210-4574

February 16, 1993

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

Re: Roswell Aquifer Assessment at
Compressor Station #9; Roswell, New Mexico
Brown & Root Environmental Proposal Number P9301030

Dear Mr. Campbell:

Brown & Root Environmental (BRE) is pleased to present this proposal to Transwestern Pipeline Company (Transwestern) to assess for contamination one of the City of Roswell aquifers at Transwestern Station #9 in New Mexico.

BRE understands that the primary objective is to install three monitor wells to assess possible groundwater impact. Our approach to meeting the assessment objective is to install three monitor wells, collect water samples for laboratory analyses, evaluate the data collected and submit a report to Transwestern detailing the results of the investigation.

The BRE scope of work will be divided into the following tasks:

Task 1 - Field Activities

- Finalize plan and design of well type, location, monitoring/development protocols, etc.
- Mobilization/demobilization for field activities.
- Install, develop, and sample three groundwater monitoring wells to a depth of approximately one hundred and twenty feet below grade. Two of the monitor wells will be located down gradient and one up gradient of the natural basin. It is assumed the ground water gradient is to the Pecos River, which is to the east southwest of the site. Proposed well locations are shown on Attachment 1.

The well installation will be conducted by a New Mexico licensed well driller under BRE supervision. The monitor well borings will be drilled using air rotary

drilling methods. The 4-inch diameter monitor wells will be constructed in accordance with appropriate State of New Mexico guidelines and specifications. The surface completion will consist of a 4 by 4 foot pad with a steel stand pipe with locking cover.

Following well installation, the wells will be developed by five well volumes. Development will allow each well to be in hydraulic contact with the aquifer. The wells will be allowed to stabilize at least 12 hours before sampling. The depth to water and total depth of the wells will be measured using an electronic probe. In order to estimate the groundwater gradient, each well will be surveyed to a common datum with 0.01 foot accuracy by a surveyor.

Prior to sampling, the wells will be purged of three to five well volumes of water, and measurements of pH, conductivity, and temperature recorded after each well volume is removed from the well. The wells will be purged with a pump or a bailer and sampled with a bailer.

The groundwater samples collected will be placed in laboratory supplied containers, properly labeled, placed on ice in shipping coolers, and delivered to a laboratory selected by Transwestern by common carrier. The samples will be labeled, packaged and shipped according to EPA protocols. Strict chain of custody procedures will be followed to ensure tracking of the samples from the time of their collection to their ultimate disposal.

Groundwater samples will be analyzed for Appendix IX volatile and semivolatile organics and total petroleum hydrocarbon (TPH). EPA Methods 624/SW 8240, 625/SW 8270, and 418.11 for organics will be utilized for those analyses. Samples will be sent to an analytical laboratory designated and paid for by Transwestern.

It is anticipated that no soil samples will be collected. Drill cuttings will be used to construct soil logs.

BRE assumes that all underground utilities and lines will be located and identified by Transwestern prior to the commencement of drilling.

BRE also assumes that Transwestern will supply the appropriate sample containers and shipping coolers.

Soil cuttings and water from well development and purging activities will be stored in drums supplied by Transwestern. BRE understands that Transwestern will be responsible for the proper disposal of all fluids, cuttings, and wastes generated during the field investigation.

A decontamination containment area will be constructed at the site by the drilling subcontractor.

Task 2 - Data Evaluation and Report

All data generated as part of this investigation will be compiled in a report to be submitted to Transwestern. The report will detail the subsurface conditions and results of all field work and sampling in a BRE report format. It will include soil logs, well completion diagrams, the results of field work and sampling, and conclusions.

SCHEDULE

BRE is prepared to begin the project within one week after receiving authorization to proceed. The Task 1, the field activities, is expected to require five days to complete. Task 3, data evaluation and report preparation, require take two weeks upon receipt of the final analytical results. We therefore anticipate that the entire project can be accomplished within approximately five weeks, assuming a two-week turnaround on laboratory results and no adverse drilling conditions or delays beyond the control of BRE.

PROJECT COST, TERMS AND CONDITIONS

The services of BRE will be provided and billed in accordance with our Environmental Professional Services Agreement No. PC-89-027 with minor modifications as listed in Attachment 2 and the attached Brown & Root Environmental Additional Contract Terms - Multiplier Type Billing rates, effective September 28, 1992. The estimated charges of these services will be approximately
). The project costs will not exceed this amount without prior written approval from Transwestern. A detailed breakdown of the estimated charges is included on Table 1.

This proposal is valid for a period of sixty (60) days from the date of its submittal.

BRE appreciates the opportunity to submit this proposal and looks forward to being of service to Transwestern. Should you have any questions regarding this proposal, please do not hesitate to contact me at (713) 575-4762.

Sincerely,

BROWN & ROOT ENVIRONMENTAL

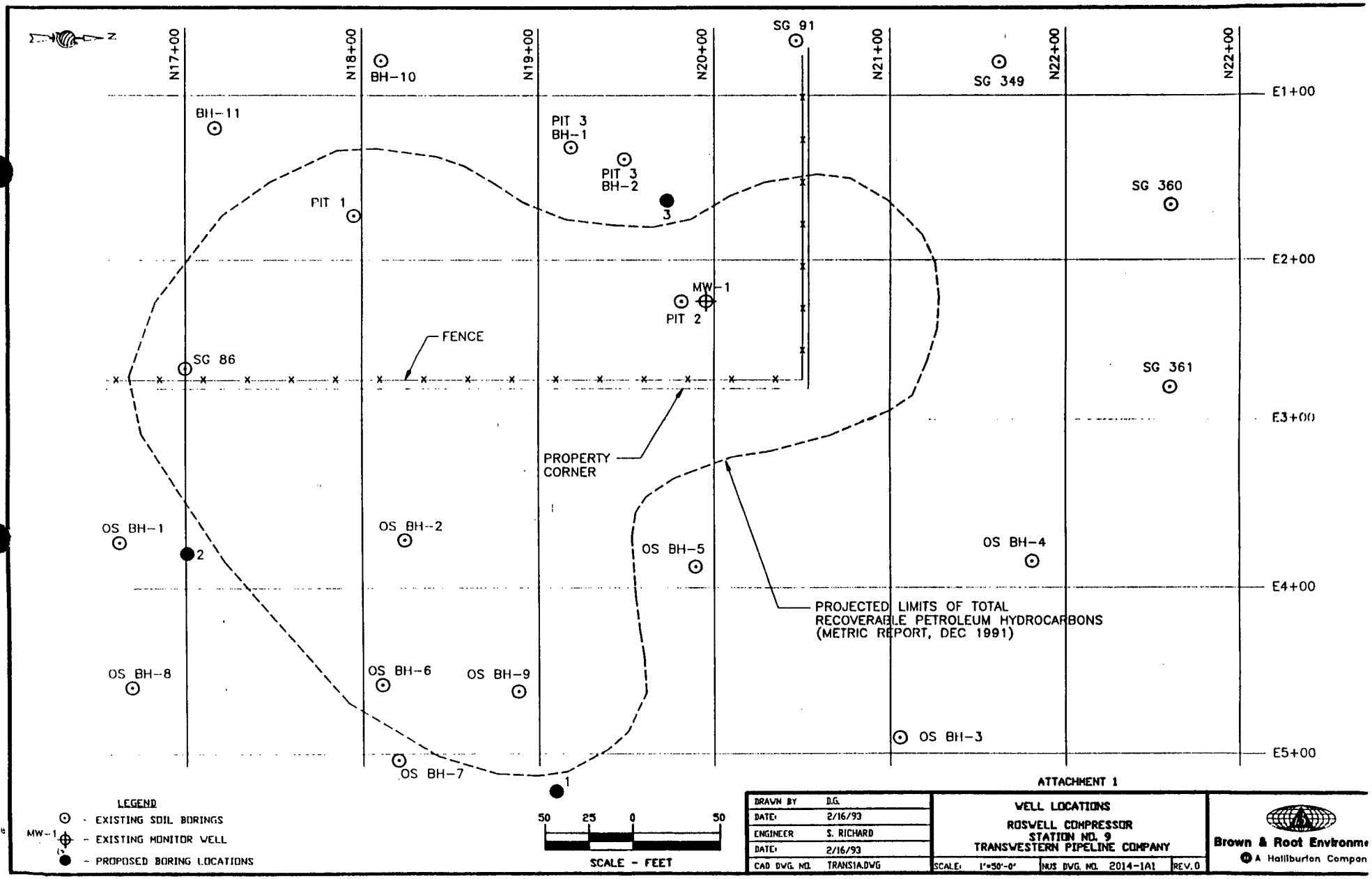
Donald R. Brenneman
Vice President
Southwest Region

Accepted for Transwestern Pipeline Company by:

_____
Signature

_____
Title

_____
Date



ATTACHMENT 1

DRAWN BY	D.G.
DATE:	2/16/93
ENGINEER	S. RICHARD
DATE:	2/16/93
CAD DWG. NO.	TRANS1A.DWG

WELL LOCATIONS
ROSWELL COMPRESSOR
STATION NO. 9
TRANSWESTERN PIPELINE COMPANY

SCALE: 1"=50'-0" | NUS DWG. NO. 2014-1A1 | REV. 0

Brown & Root Environme
A Halliburton Compan

ATTACHMENT 2

General Terms and Conditions, Paragraph 28, Contractor Warranties and Correction of the Work.

Delete the last sentence of this section which begins, "In the event the Work performed . . ." and replace with the following;

"In no event shall Contractor be liable, whether in contract or tort, including negligence, for any incidental, consequential or special damages."

Addendum 1, Paragraph 3-

Add the following;

"The limitation of liability to the scope and limits of Contractor's insurance shall also be applicable to Article 20, Alternative Contribution, of the General Terms and Conditions."

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

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

OIL CONSERVATION DIVISION
RECEIVED
'93 FEB 22 AM 9 21

February 17, 1993

Mr. Dwain Glidewell
Surfaces Resources Director
Commissioner of Public Lands
P.O. Box 1148
Santa Fe, New Mexico 87504-1148

Dear Mr. Glidewell:

Transwestern Pipeline Company requests written permission from this agency to perform subsurface drilling and construction of two (2) monitor wells at the following approximate location:

NW 1/4 of Section 28, township 9 South and Range 24 East

The purpose of this request is to determine potential groundwater contamination resulting from the operation of a pit located at Compressor Station No. 9, located near Roswell, New Mexico. It is anticipated that construction of the monitor wells will occur during the month of April, 1993.

This study is a continuation of the original drilling program in which notification was made to your agency in April of 1990.

Should you require any additional information, contact our Roswell Technical Office at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Doc Alpers
Rich Jolly
Grant Rogers
Lou Soldano
Roger Anderson OCD
file

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

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

February 7, 1993

Ms. Barbara Hoditschek
New Mexico Environmental Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, New Mexico 87502

Dear Ms. Hoditschek:

As a result of the March 2, 1993 meeting between Transwestern Pipeline Company (TPC) and the Environmental Department (ED) addressing closure of the surface impoundment at the Roswell Compressor Station, presented is a discussion describing the general history and activities which were practised at this impoundment during the in-use period.

TPC constructed and initiated operation of the impoundment in August of 1960. With approximate dimensions of 20'x 20', this below grade feature received solid and liquid wastes which included: liquids which were removed from the pipeline, various solvents, motor oil and numerous types of sold wastes (filters, drums, rags, engine parts and office trash). The information presented in the report by METRIC Corporation entitled, "Shallow Subsurface Investigation at Roswell Compressor Station Chaves County, New Mexico" confirms that the majority of the waste materials received into the impoundment were non hazardous.

The typical sequence of operation was to fill the bottom of the impoundment with liquid and solid wastes to some maximum depth and burn this material to reduce the volume of materials present. After the burning was complete, a volume of soil was then placed over the ash. This process was frequently practised until the pit was finally backfilled in June of 1986. This feature has not received wastes of any type since the June closure date.

The conditions underlying the impoundment are best described in the METRIC Report. Reference is made to a naturally occurring concave bowl which exists below the impoundment. This feature occurs approximately 15 feet below the pit bottom and collected liquids wastes which had been placed into the impoundment for disposal. The fine clay textures comprising this feature acted as a barrier to the vertical migration of the introduced liquids into

the regional groundwater. Studies will be performed in April of 1993 to determine if impacts have occurred to the regional aquifer.

Current calculations of the liquids contained in the bowl are estimated at 3,061,500 gallons. It should be noted that records were not kept for the volume of solids and liquids which entered the impoundment. The process activities were such that the liquids removed from the pipeline were automatically discharged into the impoundment.

I hope this explanation will help to clarify any additional concerns the ED may pose in the regulatory decision making process for closure of this surface impoundment.

Should you require any additional information, I can be contacted at our Roswell Technical Operations Office at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Doc Alpers
Rich Jolly
Lou Soldano Enron Legal
Roger Anderson OCD
Ed Horst
file

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

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

February 7, 1993

Mr. Edward Horst
New Mexico Environmental Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

As a result of the meeting on February 17, 1993, with members of your staff and Transwestern Pipeline Company (TPC) concerning remediation and closure of the surface impoundment pit at the Roswell Compressor Station, clarification is requested concerning the following item.

As you are aware, prior activities at the Compressor Station has resulted in the collection of approximately 3,061,000 gallons of hazardous and non hazardous liquids in a concave depressed area below the bottom of the backfilled impoundment. Because of the presence of F listed wastes present in the liquids, consideration is being given to removing the liquids which have collected in this depressed area.

It is TPC's understanding that once the liquids have been removed, groundwater concerns of the collected liquids will be eliminated. For this reason, TPC requests from your agency a determination as to when and under what physical conditions is the concave depressed area considered dewatered and no longer under any hazardous waste regulations pertaining to groundwater?

TPC has been requested by the RCRA Permits Program of the ED to submit by May 1, 1993 a closure plan for this impoundment. Clarification of this item is considered to be an extremely important matter in terms of the type of remediation technology selected. Your immediate attention and response in this matter will be greatly appreciated.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmentalist Specialist

xc: Greg McIlwain
Doc Alpers
Rich Jolly
Lou Soldano Enron Legal
Roger Anderson OCD
file

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

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

February 7, 1993

Ms. Barbara Hoditschek
New Mexico Environmental Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, New Mexico 87502

Dear Ms. Hoditschek:

To keep all parties aprised of the activities pertaining to closure of the surface impoundment at Compressor Station No. 9, Transwestern Pipeline Company is in agreement with the Environmental Department (ED) that a Part B RCRA application is not required for the closure of the impoundment at this facility.

It is Transwestern's contention that the impoundment is not classified as a treatment, storage, and disposal (TSD) facility, which participated in long term disposal, but is actually considered as a remediation site.

As per your letter request of February 17, 1993, a written closure plan will be submitted to your agency in the near future.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Doc Alpers
Rich Jolly
Lou Soldano Enron Legal
Roger Anderson OCD
Ed Horst Environmental Department
file

Station 9 / Roswell

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

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

January 25, 1993

Mr. Edward Horst
New Mexico Environmental Department
525 Camino de Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

As per our meeting on December 10, 1993, be advised that Transwestern Pipeline Company has decided to install monitor wells into the underlying aquifer to determine regional groundwater conditions at Station 9. Submittal of this information completes the requirements of Item 2, as identified in our December 15, 1992 letter to your agency.

As you may recall, two options were provided to evaluate the groundwater conditions, (1) drilling subsurface boreholes around the pit perimeter extent, or (2) monitor well installation. Based upon a review of the potential results of both options, and internal discussions, it was decided that the monitor well installation would provide Transwestern and the Environmental Department (ED) with the most reliable and applicable information.

As agreed, the proposal and scope of work addressing the monitor well installation will be presented to the ED by the March 1, 1993 deadline.

Should you require any additional information, contact our Roswell Technical Operations at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Rich Jolly
Lou Soldano
Doc Alpers
file

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717
Phone (505) 628-2761
FAX (505) 625-8060

December 15, 1992

Mr. Edward Horst
New Mexico Environmental Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

A meeting was held on December 10, 1992 in your office to address remediation and closure activities of an abandoned pit located at Transwestern Pipeline Company's Roswell Compressor Station. In attendance were Steve Alexander and Mark Sides from your Department, Roger Anderson from the OCD and Richard Jolly and myself representing Transwestern Pipeline Company. As a result of this meeting, several issues were addressed, including, submittal dates of specific information requested by Mr. Alexander. In compliance with this, presented below by item, are the dates which Transwestern will submit the following:

Item 1. Preparation of a completed Part A Hazardous Waste Permit Application. This form will submitted to your Bureau by January 15, 1993.

Item 2. By letter, the decision to perform subsurface soil sampling or the installation of monitoring wells to verify that contaminants from the pit activities have not affected regional groundwater conditions underlying the pit. This information will be submitted by February 1, 1993.

Item 3. The proposal selected by Transwestern to determine potential impacts from the pit (item 2) above, will be submitted by March 1, 1993.

Item 4. A health based risk assessment (HBRA) proposal for soil contamination of the pit will also be submitted by March 1, 1993.

Item 5. The results of the HBRA report for the soil contamination conditions present in the pits to be submitted by April 1, 1993.

Item 6. The final report for the option selected in item 3 to address groundwater conditions will be submitted by May 1, 1993.

Transwestern requests from your agency approval to extend the submittal dates, in the event unforeseen or unavoidable circumstances may occur which may delay submittal. In this instance, Transwestern will notify you verbally prior to the submittal date and follow in letter form requesting the additional time which will be required.

Thank you for your time and consideration in this matter. Should you require any additional information, I can be contacted at our Roswell Technical Office at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Doc Alpers
Rich Jolly
Roger Anderson OCD
Lou Soldano Enron Legal
file

HALLIBURTON NUS
Environmental Corporation

OIL CONSERV. ION DIVISION
RECEIVED
'92 DEC 17 AM 9 08

Environmental Technologies Group
16360 PARK TEN PLACE
SUITE 300
HOUSTON, TEXAS 77084
(713) 492-1888
(713) 492-0504 FAX

Correspondence Number C-48-12-2-036H

TRANSMITTAL

To: Mr. Roger Anderson
Oil Conservation Division
P. O. Box 2088
Attn: Santa Fe, New Mexico 87504-2088
Re: Transwestern Station 9 Report

From: Ms. Susanne Richard, R.E.P.
HALLIBURTON NUS Environmental Corp.
16360 Park Ten Place, Suite 300
Houston, Texas 77084
Date: December 14, 1992
HALLIBURTON NUS Project No.: 6250
If Material Received is Not as Listed, Please Notify Us at Once.

We are Sending You:

- ☐ Attached
- ☐ Under Separate Cover Via
- ☐ Drawings
- ☐ Documents
- ☐ Copy of Letter
- ☐ Telecon Notes
- ☒ Reports

For:

- ☐ Review & Comment
- ☒ Your Records
- ☐ As Requested
- ☐ For Signature

Copies	Date	Item
1	12/14/92	Report: Monitor Well Installation
		Transwestern Pipeline Company
		Compressor Station No. 9

Remarks: As per your discussion with Mr. Larry Campbell of Transwestern Pipeline Company. Water Monitoring Pit Report of Station 9.

Copy To: Larry Campbell/ 6250 File

technologies and services for a cleaner and safer world

F 1048-92-007

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

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

December 11, 1992

Mr. Edward Horst
New Mexico Environmental Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

A meeting was held on December 10, 1992 in your office to address remediation and closure activities of an abandoned pit located at Transwestern Pipeline Company's Roswell Compressor Station. In attendance were Steve Alexander and Mark Sides from your Department, Roger Anderson from the OCD and Richard Jolly and myself representing Transwestern Pipeline Company. As a result of this meeting, several issues were addressed, including, submittal dates of specific information requested by Mr. Alexander. In compliance with this, presented below by item, are the dates which Transwestern will submit the following:

Item 1. Preparation of a completed Part A Hazardous Waste Permit Application. This form will submitted to your Bureau by January 15, 1993

Item 2. By letter, the decision to perform subsurface soil sampling or the installation of monitoring wells to verify that contaminants from the pit activities have not affected regional groundwater conditions underlying the pit. This information will be submitted by February 1, 1993.

Item 3. The proposal selected by Transwestern to determine potential impacts from the pit (item 2) above, will be submitted by March 1, 1993.

Item 4. A health based risk assessment (HBRA) proposal for soil contamination of the pit will also be submitted by March 1, 1993.

Item 5. The results of the HBRA report for the soil contamination conditions present in the pits to be submitted by April 1, 1993.

Item 6. The final report for the option selected in item 3 to address groundwater conditions will be submitted by May 1, 1993.

Transwestern requests from your agency approval to extend the submittal dates, in the event unforeseen or unavoidable circumstances may occur which may delay submittal. In this instance, Transwestern will notify you verbally prior to the submittal date and follow in letter form requesting the additional time which will be required.

Thank you for your time and consideration in this matter. Should you require any additional information, I can be contacted at our Roswell Technical Office at 625-8022.

Sincerely,

Larry Campbell
Compliance Environmentalist

xc: Doc Alpers
Rich Jolly
Roger Anderson OCD
Lou Soldano Enron Legal
file

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

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

November 30, 1992

Mr. Ed Horst
Hazardous and Radioactive Materials Bureau
Environmental Department
525 Camino de los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

As per my conversation with Steve Alexander of your staff concerning the remediation investigation and closure of the disposal pit at Compressor Station No. 9, Roswell, enclosed find a completed Part A application as requested. This information is submitted to your agency as per 40 CFR 270.

This information has also been submitted to the Oil Conservation Division, as this pit remediation project is also under their jurisdiction.

Should you require any additional information, contact our Roswell Technical Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Walker Sanders w/o attachments
Bill Nolan "
Grant Rogers "
Doc Alpers "
Roger Anderson Oil Conservation Division, Santa Fe, N.M.
file

TRANSWESTERN PIPELINE COMPANY
ROSWELL COMPRESSOR STATION

PART A PERMIT APPLICATION

Presented below is a completed application for a Part A permit as required under 40 CFR. This information is presented in a format following the outline identified in the permit application under 40 CFR 270.13.

(a) The activities conducted by the applicant which require it to obtain a permit under RCRA:

Transwestern Pipeline Company owns and operates Station No. 9, a mainline compressor facility. At this site, an unlined pit was constructed to dispose of pipeline related wastes. this pit was used until 1986, when it was finally taken out of service and backfilled. Generally, all waste products generated from natural gas pipeline operations at this facility were deposited into this pit. Typical wastes included the following: waste solvent, scrap metal, pipeline liquids, and other miscellaneous materials.

(b) Name, mailing address, and location, including latitude and longitude of the facility for which the application is submitted:

Transwestern Pipeline Company
6381 North Main Street
P.O. Box 2018
Roswell, New Mexico 88201

The facility is located approximately 3 miles north of Roswell, New Mexico on Highway 285. The specific coordinates are as follows:

Latitude 33-30-32
Longitude 104-31-01

(c) The SIC code which best reflect the principal products or services provided by the facility:

SIC Code 4922

(d) The operator's name, address, telephone number, ownership status, and status as Federal, State, private, public, or other entity:

Transwestern Pipeline Company
6381 North Main Street
P.O. Box 2018
Roswell, New Mexico 88201
(505) 623-2761

Transwestern Pipeline Company is privately owned by:

Enron Corporation
1400 Smith Street
P.O. Box 1188
Houston, Texas 77251-1188

(e) The name, address, and phone number of the owner of the facility:

Refer to item (d) above

(f) Whether the facility is located on Indian lands:

The facility is not located on Indian lands.

(g) An indication of whether the facility is new or existing and whether it is a first or revised application:

This is an existing facility which first began operation in August of 1960. This facility has never submitted a Part A application.

(h) A scale drawing of the facility showing the location of all past, present, and future treatment, storage, and disposal areas:

A plan map of the facility and pit area is attached.

(i) A description of the processes to be used for treating, storing, and disposing of hazardous waste, and the design capacity of these items:

It is envisioned at this time that remediation of this site will be accomplished as an in-situ process, consisting of bioremediation and air sparging. A remediation plan will be presented to the ED at a later date.

(j) A specification of the hazardous wastes listed or designated under 40 CFR part 261 to be treated, stored, or disposed of at the facility:

F001 1,1,1-trichloroethane

(l) A topographic map extending one mile beyond the property boundaries of the source and any wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within 1/4 mile of the facility property boundary:

A U.S.G.S. 7.5 minute map of the compressor station facility is included with this application. A search of the public records indicated there to be no water wells within 1/4 mile of the pit location. All surface water bodies within this perimeter have been identified on this map.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

2/15

E. W. Sanders

Vice President

Vice President, Operations
Transwestern Pipeline Co.

GRID NORTH (N00°09'W)
TRUE NORTH

NOTE: FOR ENLARGED PLAN OF OFFICE BLDG AREA SEE DWG. T48-N-6

REV.	DATE	DESCRIPTION	DR.	APP.

DWG. NO.	DESCRIPTION

REFERENCE DRAWINGS

TRANSWESTERN PIPELINE COMPANY

SCALE		DATE
DRAWN		
CHECKED		
APPROVED		
APPROVED		

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

MELENA QUADRANGLE
NEW MEXICO-CHAVES CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

Mapped, edited, and published by the Geological Survey

Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1961. Field checked 1962

Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, east zone
1000-meter Universal Transverse Mercator grid ticks, zone 13, shown in blue

Fine red dashed lines indicate selected fence lines

UTM GRID AND 1962 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24000

CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
DATUM IS MEAN SEA LEVEL

ROAD CLASSIFICATION
Heavy-duty ——— Light-duty ———
Unimproved dirt - - - - - -
U.S. Route

QUADRANGLE LOCATION

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER 25, COLORADO OR WASHINGTON 25, D.C.
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

MELENA, N. MEX.
N3330-W10422.5/7.5

1962

AMS 5151 III SW-SERIES V881

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

PANTHER HILL QUADRANGLE
NEW MEXICO-CHAVES CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

5051 II NW (MOUSE CANYON)

5051 II NE (MARLEY DRAW)

VAUGHN 79 MI.
MESA 31 MI.

5151 I NW (COYOTE DRAW)

104°37'30"
33°37'30"
32'30"
104°30'
35'
440 000 FEET
950 000 FEET
920 000 FEET
420 000 FEET
3720000m.N.
3707000m.N.
535000m.E.
543000m.E.

Eden Valley Pipeline

Panther Hill
Panther Windmill
Gravel Pit
Well 3691
Well 3694
Well 3668
Well 3661
Well 3648
BM 3687
BM 3652
BM 3650
BM 3620
BM 3642
BM 3643
BM 3675
BM 3613
Compressor Station
Tolles Recorder Well 3692
Well 3679
Well 3672
Well 3633
Well 3692
Well 3644
Salt Creek Ch.
Dr Robert Goddard Original Rocket Tower Site
Butler Windmill
Tom Ned Tank
Middle Berrendo Creek
Still
Pipeline
T. 8 S.
T. 9 S.
R 23 E
R 24 E
7 MI. TO U.S. 70
2 MI. TO JUNC. U.S. 70
ROSWELL (COURTHOUSE) 7 MI.
5051 II SW (BARN DRAW)
5151 I SW (MELENA)
5050 I NE (ROSWELL NORTH)
5050 I NW (CORN RANCH)
5150 IV NW (BITTER LAKE)

Mapped, edited, and published by the Geological Survey

Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1961. Field checked 1962

Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, east zone
1000-meter Universal Transverse Mercator grid ticks, zone 13, shown in blue

Fine red dashed lines indicate selected fence lines

UTM GRID AND 1962 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

1 MILE
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET
1 KILOMETER

CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
DATUM IS MEAN SEA LEVEL

ROAD CLASSIFICATION
Heavy-duty
Light-duty
Unimproved dirt
U.S. Route

NEW MEXICO
QUADRANGLE LOCATION

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER 25, COLORADO OR WASHINGTON 25, D.C.
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

PANTHER HILL, N. MEX.
N3330-W10430/7.5

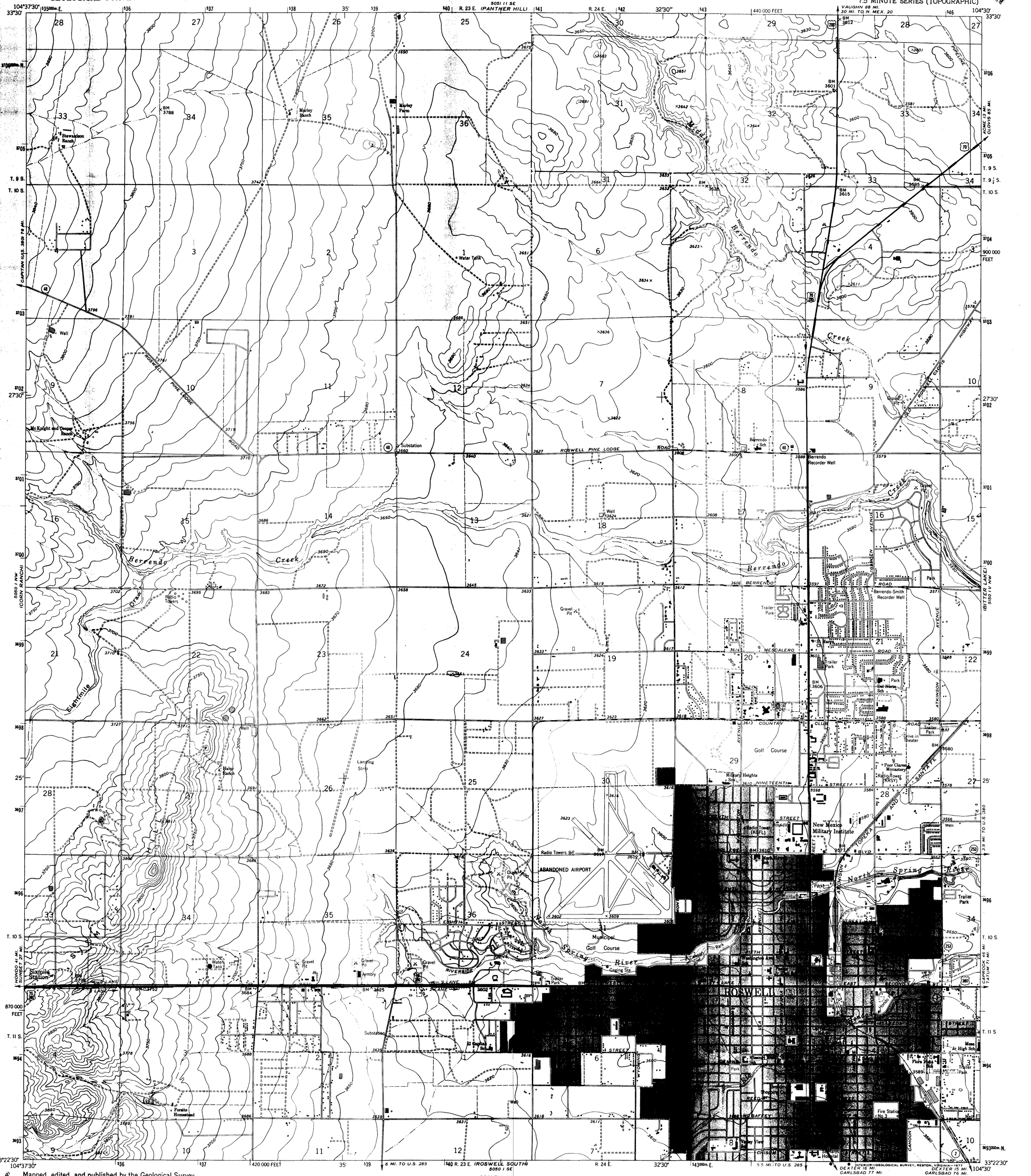
1962

AMS 5051 II SE-SERIES V881

INTERIOR—GEOLOGICAL SURVEY, WASHINGTON, D. C.—1965

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

ROSWELL NORTH QUADRANGLE
NEW MEXICO-CHAVES CO
7.5 MINUTE SERIES (TOPOGRAPHIC)



Mapped, edited, and published by the Geological Survey
in cooperation with U.S. Corps of Engineers

Control by USGS and USC&GS

Planimetry by photogrammetric methods from aerial photographs taken 1961. Topography by planetable surveys 1949. Revised 1962

Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, east zone
1000-meter Universal Transverse Mercator grid ticks, zone 13, shown in blue

Fine red dashed lines indicate selected fence lines

Red tint indicates area in which only landmark buildings are shown

Revisions shown in purple compiled from aerial photographs taken 1975. This information not field checked

Purple tint indicates extension of urban areas

UTM GRID AND 1975 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5 FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

QUADRANGLE LOCATION

ROAD CLASSIFICATION

Heavy-duty ——— Light-duty ———
Medium-duty ——— Unimproved dirt - - - -
U.S. Route ◯ State Route

ROSWELL NORTH, N. MEX.
N3322.5–W10430/7.5

1962
PHOTOREVISED 1975
AMS 5050 I NE–SERIES V881

INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1977

STWL

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

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

November 9, 1992

Mr. Ed Horst
Hazardous and Radioactive Materials Bureau
Environmental Department
525 Camino de los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Horst:

As per my conversation with Steve Alexander of your staff concerning the remediation investigation and closure of the disposal pit at Compressor Station No. 9, Roswell, enclosed find a completed Part A application as requested. This information is submitted to your agency as per 40 CFR 270.

Should you require any additional information, contact our Roswell Technical Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

This is determined unacceptable until the appropriate forms are filed. SWL

xc: Walker Sanders
Bill Nolan
Grant Rogers
Doc Alpers w/o attachments
file

5/16/92 EP/OCD/ENRON Roswell Compressor Meeting 1:30 pm

attendees - Bill Olson - OCD Santa Fe
Rogen Anderson - "
Larry Campbell - ENRON
Bruce Swanton EP Haz-waste
Steve Alexander " "
Ed Horst " "

L.C.

pit 1 40'x40'x 15'
pit 2 approximately 10'x10'x10'
pit 3 " "

1st carried out soil gas investigation
follow with MW drilling
poor correlation btw soil gas work & drilling sampling work
Purchased water results from pit disposal determined
Would like to pump out thru cap site and put in downgradient MW.
Water will SE of site has DTW 70

EH What is vol. of water in perched zone

L.C. approx. 30 feet water see plate 2
want to install 4" MW in vicinity of pit 2

B.O. sample & submit to EP & OCD

BTS. & TA any TCE solvent

EP/
BS. OUP-need - 1.) BA/QC on existing data
2.) install MW (will submit design, location for approval)
3.) sample for 8240 constituents
8270
heavy metals
General Chem
~~4.) Purge water, fluids~~
4.) Map of water table, TD etc.
5.) info on water supply logs SE of plant
6.) submit all info to state for review

12:00 pm OCD/ED/ENRON Roswell Station Meeting 10/15/92

Attendees - Bill Olson - OCD Larry Campbell - ENRON
- Roger Anderson - OCD Steve Alexander - ED Hazardous

L.C. - presented lab results of recent MW installed in vicinity of pit 2

see subpoint 5 soil action levels

Lab results of G.W. show below TC but still high BTEX #'s, 1,1,1 Trichloroethane, 1,1 Dichloroethane

- ED will check on need for G.W. monitoring
- ENRON will get copy of report on MW to OCD & ED when complete

- OCD will wait on ED determination and review of ENRON document

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

BRUCE KING
GOVERNOR

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

April 21, 1992

Mr. Larry Campbell
6381 N. Main Street
Roswell, NM 88202-1717

RE: **Roswell compressor station site cleanup**
"Shallow subsurface investigation . . . " Metric 12/91 Report

Dear Mr. Campbell:

The Hazardous and Radioactive Materials Bureau (**HRMB**) has received and reviewed the subject report, and has the following comments and questions:

1. What is the history of site disposal practices? The report finds location SG86, for example, to be a highly contaminated location, yet this location is not in one of the pits. As further examples, what accounts for the lack of volatile constituent contamination at sites BH8 and BH7? What accounts for the high TPH at BH9? A knowledge of past practices of the site would help in understanding the distribution of contaminants found there and may well impact further assessment/remediation decisions.

2. Transwestern still has not provided HRMB with a contact in the water users association which owns or operates the production well near the compressor station site.

3. The vertical limit of contamination has not been determined. HRMB defines the vertical limit of contamination as a horizontal plane underlying the site at which no hazardous constituent exceeds background levels (for heavy metals) or exceeds the Method Detection Limit (**MDL**) (for organic constituents). The MDL is defined as the estimated concentration at which the signal generated by a known constituent is three standard deviations above the signal generated by a blank, and represents the 99% confidence level that the constituent does exist in the sample.

4. Insufficient Quality control/Quality assurance data (**QA/QC**) have been provided. I attach to this letter a summary of HRMB required QA/QC.

5. Transwestern has not demonstrated that existing aquifers underlying the perched aquifer are not also contaminated.

If you have any questions regarding this matter, please contact Dr. Bruce Swanton of my staff at (505) 827-4300.

Sincerely,

Edward Horst, RCRA Programs Manager
Hazardous and Radioactive Materials Bureau

cc: Bruce Swanton, Technical Group Supervisor
Bill Olsen, Oil Conservation Division
Garrison McCaslin, NMED District IV
SQG File 1656

Components of an Adequate Laboratory Quality Assurance/Quality Control Plan

New Mexico Hazardous and Radioactive Materials Bureau
Technical Support Group
(505) 827-4300

The Hazardous and Radioactive Materials Bureau (**HRMB**) requires that analytical QA/QC meet the following minimum standards:

1. All constituents identified above the MDL must be reported.

   The Method Detection Limit is defined as the estimated concentration at which the signal generated by a known constituent is three standard deviations above the signal generated by a blank, and represents the 99% confidence level that the constituent does exist in the sample.

2. The "tune" of the GC/MS for volatile organic constituents must be checked and adjusted (if necessary) each twelve (12) hour shift by purging 50 ng of a of a 4-bromofluorobenzene (BFB) standard. The resultant mass spectra must meet the criteria given in Table 1 before sample analysis proceeds.

3. The "tune" of the GC/MS for semi-volatile organic constituents must be checked and adjusted (if necessary) each twelve (12) hour shift by injecting 50 ng of a Decafluorotriphenylphosphine (DFTPP) standard. The resultant mass spectra must meet the criteria given in Table 2 before analysis proceeds.

4. For every 20 samples perform and report:

   A) Duplicate spike for organics.

   B) Duplicate sample analysis or matrix spike for inorganics.

   C) Reagent blank, results provided for organic work.

   D) One check sample at or near the Practical Quantitation Limit for a subset of the parameters.

5. Analytical results must not be "blank corrected."

6. Any deviation from EPA-approved methodology must have a Written Standard Operating Procedure and NMED approval.

7. Detection limits must be generally in line with those listed in Appendix IX to §264.

8. The laboratory must document:

   A. That all samples were extracted, distilled, digested, or prepared (if appropriate) and analyzed within specified holding times.

   B. That if a sample for volatile analysis is received with headspace, this is reported.

   C. The date of sample receipt, extraction and analysis for each sample.

   D. Any problems or anomalies with the analysis should be documented.

   E. That all solids were analyzed dry and that the reported results are corrected to reflect a dry weight basis.

9. The name and signature of the lab manager must appear on each report.

10. The reported surrogate and spike recoveries must fall within: 1. the historical (statistically based) acceptance limits, generated at the laboratory or 2. the limits tabulated by the appropriate method from the current edition of SW-846, whichever limit is narrower. The actual historical recoveries must be submitted to HRMB with the analysis.

TABLE 1

BFB KEY IONS AND ABUNDANCE CRITERIA

Mass	Ion Abundance Criteria
50	15.0 - 40.0 percent of the base peak
75	30.0 - 60.0 percent of the base peak
95	base peak, 100 percent relative abundance
96	5.0 - 9.0 percent of the base peak
173	less than 2.0 percent of mass 174
174	greater than 50.0 percent of the base peak
175	5.0 - 9.0 percent of mass 174
176	greater than 95.0 percent but less than 101.0 percent of mass 174
177	5.0 - 9.0 percent of mass 176

TABLE 2

BFB KEY IONS AND ABUNDANCE CRITERIA

Mass	Ion Abundance Criteria
51	30.0 - 60.0 percent of mass 198
68	less than 2.0 percent of mass 69
70	less than 2.0 percent of mass 69
127	40.0 - 60.0 percent of mass 198
197	less than 1.0 percent of mass 198
198	base peak, 100 percent relative abundance
199	5.0 - 9.0 percent of mass 198
275	10.0 - 30.0 percent of mass 198
365	greater than 1.00 percent of mass 198
441	present but less than mass 443
442	greater than 40.0 percent of mass 198
443	17.0 - 23.0 percent of mass 442

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

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

March 10, 1992

Dr. Bruce Swanton
HRMB Technical Group Supervisor
State of New Mexico Environment Department
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, New Mexico 87502

Dear Dr. Swanton:

In reference to the February 14, 1992 meeting for remediation of the disposal pits at the Roswell Compressor Station, enclosed please find the following requested information:

1) A copy of a MSDS information for the corrosion inhibitor used in the pipeline operation is included. I was informed by our corrosion specialist that this product, Nalco 4910 Corrosion Inhibitor has been in use for at least the last 7 years.

2) Attached is a copy of a letter from the State of New Mexico, which owns the surface rights to the area offsite, granting access to perform the drilling study.

3) Upon further investigation, depth to groundwater in the site vicinity is at approximately 70 feet. This information was generated from a monitoring well located approximately .5 miles south of the pit locations. The Pecos Valley Artesian Conservancy District maintains operation of the well. They are located in Roswell.

4) As a point of historic data, the pits were first opened in 1959. They were in service until 1986, when at that time, they were then backfilled.

I hope this information is helpful in the analyses of the pit review study. If you should require any additional information, contact me at 625-8022.

Sincerely,

Larry

Larry Campbell
Compliance Environmentalist

xc: Rich Jolly
Grant Rogers
Doc Alpers

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

BRUCE KING
GOVERNOR

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

M E M O R A N D U M

TO: File

FROM: Bruce Swanton, HRMB Technical Group Supervisor

THROUGH: Ed Horst
Benito Garcia

DATE: February 14, 1992

SUBJECT: Pigout waste disposal pits near Roswell

Met with Coby Muckelroy and Larry Campbell of Enron. Enron is the parent company of Transwestern Pipeline and Northern Natural Gas. Enron pipelines run from Liberal, Kansas and Monahan, Texas to Roswell, NM, then roughly parallels I-40, passing near Gallup then into Arizona. Gas is currently transported one way, east to west, but plans call for two-way transport at some time in the future.
Compressor station cleaning and pigout wastes from running "pig" through the pipelines and following with water for maintenance. Solvents, e.g., trichloroethane, have been used for degreasing at this compressor station and also disposed of in the pit. Most of the pigout waste contaminants are 3 to 15 carbon aliphatics. Corrosion inhibitors have been used. Mr. Campbell will submit MSDS sheets on these. Methanol has been used to de-ice the pipeline. Pit last received wastes after 1980.

There were three pits, about 25 feet deep, which have been backfilled. The native water table is at about 120 feet. Pits are in extreme NE corner of property. At extreme SW corner is a well owned by a local well Co-op. Stated to be used only for water level measurements. Mr. Campbell will submit contact names for Co-Op members. A perched saturated zone has built up due to liquid disposal in the pits. The saturated zone may be 30 feet thick (plate #2 of Metric 12/91 report). Water is hard, but likely to be less than 10,000 tds. Pit 1 seems to be the most highly contaminated, known 18 ppm TCA at 13 feet below surface level.

Transwestern thinks that results which show that deeper zones within the red clay are uncontaminated mean that the clay has acted as a complete barrier to vertical liquid movement through the clay zone.

cc: Bruce Swanton, HRMB
Roger Anderson, Oil Conservation Division/Energy & Minerals Dept.
Garrison McCaslin, Roswell District IV Office

METRIC
Corporation ENVIRONMENTAL ENGINEERING AND SCIENCE

8429 WASHINGTON PLACE NE, SUITE A
ALBUQUERQUE, NEW MEXICO 87113
(505) 828-2801

February 5, 1992

Mr. Roger Anderson
Oil Conservation Service Division
P. O. Box 2088
State Land Office
Santa Fe, New Mexico 87504-2088

Dear Mr. Anderson:

As per your conversation on February 5, 1992 with Mr. Larry Campbell of Transwestern Gas Pipeline Company, enclosed for your review, please find one copy of a report entitled "Shallow Subsurface Investigation at Roswell Compressor Station" Chaves County, New Mexico.

Please have this report reviewed by your agency prior to the February 14, 1992 meeting between OCD and Mr. Larry Campbell.

If you have any questions, please contact Mr. Campbell at (505) 625-8022.

Sincerely,

Peter H. Metzner
President

PHM:kc

enclosure

cc: Mr. Larry Campbell


ENVIRONMENTALLY
HAZARDOUS
LIQUID

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

2040 South Pacheco
P.O. Box 6429
Santa Fe, New Mexico 87505-5472

ENRON
Gas Pipeline Operating Company
WESTERN REGIONAL OFFICE
P. O. Box 2018 • Roswell, New Mexico 88201 • (505) 623-2761

December 20, 1990

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

As set forth in the permit requirements for Discharge Plan GW-52, Roswell Compressor Station, enclosed please find the 1990 annual inspection to be visually conducted on all sums for this facility.

If you require any additional information, contact me at (505) 623-2761 ext. 222.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Bill Nolan
Grant Rogers
Rusty Nasta

ENRON
CORP

Interoffice
Memorandum

To: Larry Campbell

Department: Environmental Affairs

From: Rusty Nasta

Date: December 15, 1990

Subj: Inspection of Pig Receiver Sumps

The annual inspection of the sumps which collect pipeline liquids from the Panhandle and West Texas lines were visually inspected to determine tightness and integrity. After a review of the system, it was determined that the internal construction was found to not have any leaks or cracks which would indicate contamination to the soils adjacent to the sump.

ENRON CORP

Interoffice Memorandum

To: Larry Campbell

From: Grant Rogers

Department: Roswell District

Subject: Underground Oily Waste Sump at Station 9

Date: December 17, 1990

The concrete underground oily waste sump at Station 9, which services the drains from our Utility Building wash rack, Engine room and Auxiliary Building, was emptied, cleaned and inspected on Dec. 4, 1990. No further action was deemed necessary at this time.

This sump has an automatic level control which maintains a minimal lever. The liquid is pumped to an above ground tank for storage and removal. It is sampled and analyzed peridically.

be

File

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

November 9, 1990

GARREY CARRUTHERS
GOVERNOR

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-447

Mr. W. Alan Bowman
Enron Gas Pipeline
Operating Company
P. O. Box 1188
Houston, Texas 77251-1188

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

Dear Mr. Bowman:

The ground water discharge plan renewal (GW-52) for the Enron Gas Pipeline Operating Company Roswell Compressor Station located in the SW/4 SW/4, Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico is hereby approved.

The approval discharge plan consists of the plan dated April 9, 1990 and the materials dated August 16,1990 and September 26, 1990, submitted as supplements to the discharge plan.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.A., please note Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.
There will be no routine or reporting requirements other than those specified in the discharge plan.

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 3019.G.4., this plan approval is for a period of five (5) years. This approval will expire November 9, 1995 and you should submit an application for renewal in ample time before that date. It should be noted that all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of an underground drainage testing program as a requirement for discharge plan renewal.

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/RCA/sl

cc: OCD Artesia Office

ENRON
Gas Pipeline Operating Company
WESTERN REGIONAL OFFICE
P. O. Box 2018 • Roswell, New Mexico 88201 • (505) 623-2761

OIL CONSERVATION DIVISION
RECEIVED
'90 NOV 13 AM 9 39

October 31, 1990

New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Attention: Mr. Roger Anderson
Environmental Engineer

Re: Transwestern Pipeline Company
Discharge Plan GW-52
Roswell Compressor Station, Chaves County, New Mexico

Dear Mr. Anderson:

This is our response to the Oil Conservation Division (OCD) comments and requests of May 7, 1990, for additional information concerning the above referenced discharge plan application. This response will correspond to each item identified as per your letter:

1. The Spill Prevention, Control, and Countermeasure (SPCC) Plan is enclosed.

2. A splash containment to prevent salt accumulation on the soils below the engine cooling radiators will be constructed and in place by December 15, 1990.

3. Berming of above ground tanks will be completed by December 15, 1990.

4. A visual internal inspection of existing sumps will be conducted annually, beginning in December, 1990.

As our timetable for discharge plan extension expires on November 8, 1990, we would appreciate your attention in this matter.

If you may require any additional information, please contact me at 623-2761 ext. 222.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Terry Doyle
Rich Jolly
Jim Alexandar
Akhtar Alvi

TRANSWESTERN PIPELINE COMPANY

ROSWELL COMPRESSOR STATION

SPCC PLAN

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

OCTOBER 1990

GMS & ASSOCIATES

11261 RICHMOND, BLDG. G, SUITE 110, HOUSTON, TEXAS 77082-2617
(800) 366-9117 (713) 497-7815
FAX (713) 497-0202

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SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN
Transwestern Pipeline Company
Roswell Compressor Station

1.0 INTRODUCTION

The management and personnel of Transwestern Pipeline Company realize and acknowledge the importance of preventing oil from being spilled into the navigable waters of the United States and preventing harmful releases into the environment. The following Spill Prevention, Control and Countermeasure (SPCC) Plan is designed to serve two purposes to help protect the environment.

- First, it provides the procedures which will be used to prevent oil spills and waste releases.
- Second, should a spill or release occur, it describes the protocols for immediate coordination of necessary activities to minimize any harmful effects, including notifications of appropriate government agencies as required under federal regulations.

For the purpose of handling spill responses effectively, this SPCC plan provides: descriptions of the duties performed by facility personnel; procedures to be followed; equipment available; and available outside resources.

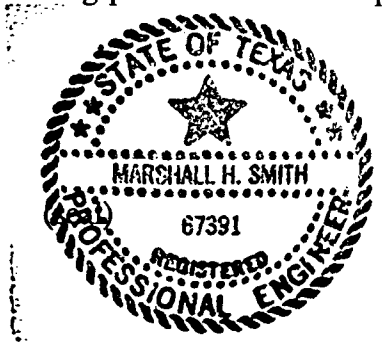
This SPCC plan was developed in accordance with the requirements of Title 40 CFR Part 112, and the applicable requirements of the State of New Mexico Oil Conservation Division . This plan conforms to the recommendations of API Bulletin D16, entitled " Suggested Procedures for Development of Spill Prevention, Control and Countermeasure Plans", revised April 1990.

1.1 Management Approval - This SPCC Plan, required under 40 CFR Parts 112, will be implemented as described herein, and is approved by:

_____ Date:_____

Mr. Grant S. Rogers

1.2 Engineering Certification - I hereby certify that I have examined the Transwestern Pipeline Company facility located in Chaves County, New Mexico and being familiar with the provision of 40 CFR 112, attest that the following SPCC plan has been prepared in accordance with good engineering practices and the requirement of 40 CFR parts 112.7; certified by:



Marshall H. Smith, P.E. Date: November 5, 1990

Marshall H. Smith

Texas Registration No. 67391

2.0 GENERAL FACILITY INFORMATION

2.1 Brief Facility Description - This facility is designed to receive and compress natural gas and remove pipeline liquids received witht the gas. The liquids removed include water and hydrocarbons. Oil and water recovered from the gas is temporarily stored at the facility until removed in trucks for recovery. The design capacity of the compressor station is 750 MMscfd of natural gas. It receives gas through three 24" pipelines (1 West Texas Lateral, 1 West Texas Loop and Panhandle Lateral) and transports it westward through two 30" pipelines.

Materials which are stored at the facility include:

- Diesel Fuel
- Recovered Pipeline Liquids
- Oily Wastewater
- Used Oil
- Scrubber Liquor
- Lubricating Oils
- Engine Coolant
- Gasoline
- Washwater

All storage tanks are above grade vessels constructed of steel and located on concrete or gravel pads. Drummed materials are stored in a warehouse or on a concrete pad equipped with containment curbs. Some of the miscellaneous chemicals used at the facility are stored in warehouses, or in a fenced area. There are no process water streams discharged from this facility

into navigable waters. The Roswell facility is located in Chaves County, New Mexico. A facility plot plan is found in Attachment No. 1, which includes an area map for reference.

2.2 Designated Contact - Mr. Grant Rogers, is the designated individual for spill prevention and, if a spill occurs, coordination of spill response at the Roswell Compressor Station. Correspondence should be addressed to:

Mr. Bill Nolan

Transwestern Pipeline Company

6381 North Main

P.O. Box 2018

Roswell, New Mexico 88202

or

Grant S. Rogers

Transwestern Pipeline Company

P.O. Box 2018

Chaves County

Roswell, New Mexico 88202

Mr. Rogers is the Emergency Response Supervisor for this facility. Transwestern will utilize trained personnel and local fire departments to respond to emergency situations. Typically, after an emergency event, e.g. fire, spill or explosion, some form of clean-up is necessary. As in the case of emergency events, Transwestern will rely on RCRA and OSHA trained personnel to conduct the spill clean-up.

2.3 Storage Tanks - The tankage at the Roswell Station is constructed of all steel material with welded seams. Additional details concerning the facility tankage and containment systems are found in Attachment No. 2.

a. Pipeline Liquids Tank - This steel walled storage tank has a capacity of 500 barrels. The liquids placed in this tank are those removed from the pipeline and consist of water, scrubber liquids and petroleum hydrocarbons. These liquids are removed into trucks and transferred to an off-site facility. The tank is constructed on a concrete pad with concrete dikes capable of containing at least 130 percent of the capacity of the tank. This tank is constructed on 10 inch steel I-beams to allow inspection of the tank and early detection of any leaks.

b. Oily Wastewater Storage Tank - This steel walled storage tank has a capacity of 210 barrels. The liquids placed into this tank are pumped from sumps located in various buildings located at the facility. Sumps are located in the compressor engine room and the areas where the pigs are removed from the pipeline and cleaned. The oil and water mixture is removed into trucks and transported off-site. The tank is constructed on a concrete pad with concrete dikes capable of containing at least 130 percent of the volume of the tank. This tank is constructed on 10 inch steel I-beams to allow inspection of the tank and early detection of any leaks.

c. Used Lubricating Oil Storage Tank - This steel walled storage tank has a capacity of 210 barrels. Oil removed from engines, compressors and other rotating equipment is placed into this tank. The oil is loaded onto trucks for recovery off-site. The tank is constructed on a concrete pad with concrete dikes capable of containing at least 130 percent of the volume

of the tank. This tank is constructed on 10 inch steel I-beams to allow inspection of the tank and early detection of any leaks.

d. Waste Lubricating Oil Storage Tank - This steel walled storage tank has a capacity of 210 barrels. Oil removed from engines, compressors and other rotating equipment which may be contaminated is placed into this tank. The oil is loaded onto trucks for recovery off-site. The tank is constructed on a concrete pad with concrete dikes capable of containing at least 130 percent of the volume of the tank. This tank is constructed on 10 inch steel I-beams to allow inspection of the tank and early detection of any leaks.

e. Wash Rack Tank - This steel walled tank has a capacity of 910 gallons and is located on a curbed concrete pad. It is used to store sodium hydroxide, "caustic soda", used to clean mechanical parts. The spent cleaning solution is periodically sent off-site for recovery.

f. Oil Storage Tanks (2) - These steel walled tanks have a capacity of 7,693 barrels each. They are used to store unused lubricating oil. They are located in a common containment area which consists of a concrete pad with concrete dikes capable of containing at least 130 percent of the combined volume of these tanks.

g. Gear Oil/Glycol Storage Tank - This steel walled tank has a total capacity of 7,693 gallons. The tank is equipped with a divider and is used to store unused gear oil on one side and unused glycol on the other side. The tank is located in a containment area which consists of a concrete pad with concrete dikes capable of containing at least 130 percent of the volume of the total volume of this tank.

h. Gasoline Storage Tank - This steel walled tank has a capacity of 100 gallons and is located on a concrete pad. It is used to store gasoline used to power the emergency fire pump.

i. Diesel Fuel Storage Tank - This steel walled tank has a capacity of 750 gallons of diesel fuel. It is located in a containment area which consists of a concrete pad with concrete dikes capable of containing at least 130 percent of the volume of the tank.

j. Methanol Storage Tank - This storage tank consists of three steel walled cylinders which are constructed with interconnecting piping. The tank is located on a gravel pad with a concrete pad and curbed area under the filling connections. The tank is sloped toward the containment pad to provide additional capability to prevent leaks or drips from spreading. There is also a supply of empty drums kept in a containment area adjacent to the tank which could be used to remove some of the contents of the tank in the event of a leak.

Table 2.1

Storage Tank Summary

Tank Name	Storage Capacity	Containment Capacity
A. Pipeline Liquids Tank	21,000 gallons	34,815 gallons
B. Oily Wastewater Tank	8,820 gallons	Shared with A.
C. Used Oil Storage Tank	8,820 gallons	28,237 gallons
D. Waste Oil Storage Tank	8,820 gallons	Shared with C.
E. Wash Rack Tank	910 gallons	Curbed and routed to sump
F. Oil Storage Tanks (2)	7,693 gal.(each)	25,600 gallons
G. Gear Oil/ Glycol Tank	7,693 gallons	Shared with F.
H. Gasoline Storage Tank	100 gallons	Concrete pad
I. Diesel Fuel Storage Tank	750 gallons	990 gallons
J. Methanol Storage Tank	1,650 gallons	230 gallons

2.4 Loading and Pipeline Facilities - There are three (3) loading and unloading areas at the Roswell facility. One is for loading and unloading used and virgin lubricating oils and glycol, one is used for unloading the pipeline liquids and oily wastewater tanks, and one is for loading and unloading methanol. Each of these loading areas have a concrete pad and curbs to contain any spilled or dripped material and runoff. Other tanks are loaded and unloaded directly into or from trucks using

flexible hoses.

The facility is part of gas pipeline system used to transport natural gas to consumers. Wastewater and recovered liquids which are by-products of the gas compression operations, are also transported around the facility in above and below grade pipelines. The pipelines used for transporting the products and the wastewater are designed to the same safety and corrosion standards. The gas transmission pipelines are connected to a rectifier system to prevent corrosion of the buried pipes. The location of the pipelines are shown on the facility plot plan included in Attachment 1.

2.4.1 Loading and Unloading Operations - Materials are delivered in and out of the facility by truck and by pipeline on a continual basis. The loading(and un-loading) racks are located in areas which are constructed with concrete bases and curbs. This feature minimizes the potential for harmful discharges from drips or spills which may occur during loading operations. Loading and unloading operations are supervised by Transwestern employees.

2.4.2 Pipeline System - The facility has numerous underground pipeline systems, which are shown on Figure No. 2-1 in Attachment 1. Since all pipelines which are located in traffic areas are buried, vehicle traffic warning signs are not required. If a leak does occur, clean-up will be conducted by trained personnel.

3.0 OIL SPILL EMERGENCY PREVENTION MEASURES

It is recognized that the facility must be maintained and operated to minimize the possibility of a fire, explosion, or any sudden or non-sudden release of oil or hazardous constituents into the air, soil, or surface water, which could threaten human health or the environment. As such, the following preventive measures have been implemented at the Roswell Compressor Station to minimize the possibility of releases and to minimize their impact should a release occur.

3.1 Security - The entire Roswell facility is enclosed by a six foot high hurricane fence with barbed wire across the top. There is only one gate that is kept open during the work periods. The main gate is left unlocked while the facility is staffed, but is locked at the close of each business day. The facility can be accessed after normal working hours by the use of a security code which opens the gate.

3.2 Lighting - The operational areas, including facilities with oil and waste storage, of the Roswell facility are adequately lit at night, to detect spill or leakage and to conduct spill control activities.

3.3 Spill Containment Devices - The Roswell facility will use concrete or earthen dikes to control accidental oil and waste releases should they occur. The majority of the significant oil or wastewater storage areas have dikes enclosing the tanks. These containment systems comply with the standards established by the State of New Mexico. The following storage vessels are contained within a diked area sufficient to hold 130 percent of the volume of the largest storage vessel or largest group of interconnected vessels within the diked area:

- Pipeline Liquids Tank
- Oily Wastewater Storage Tank
- Waste Oil Storage Tank
- Used Oil Storage Tank
- Oil Storage Tanks (2)
- Gear Oil/Glycol Storage Tank
- Diesel Storage Tank

All diked areas used to store material or waste material have no outlet piping or valves for drainage. Removal of accumulated liquids from all diked areas can be accomplished by using a portable pump and requires the approval of the supervisor responsible for spill prevention. Before approval, this supervisor will visually inspect this diked area to be drained. Drainage will only be allowed if no remedial action is necessary. Accumulated liquids are to be removed to the Oily Wastewater Storage Tank if there is any evidence of oil.

3.4 Special Precautions - Waste or flammable materials will not be stored within 50 feet of the property line in accordance with NFPA standards. Incompatible materials(if any are present) will be stored in segregated areas. Adequate space shall be provided in and around all areas where oil and wastes are stored to allow the unobstructed movement of personnel and equipment for spill control, emergency response, and for fire fighting needs.

3.5 Inspections - Each of the facility's storage tanks, sumps and containment systems will be visually inspected annually. This inspection will included at the minimum the following:

o Evidence of leaks or spills

- o Rusted areas on tanks and piping
- o Structural integrity of tank and containment system
- o Breathing vent condition
- o Hoses and associated connections
- o Valving
- o Condition of paint
- o Condition of tank supports
- o Integrity of joints in containment system

The inspectors observations will be recorded on the "Annual Tank Inspection Form" provided in Attachment No. 3. Corrective action for potential problems detected during the inspection will be taken as necessary and will be recorded on inspection forms.

3.6 Personnel Training - All personnel, except office personnel, at the Roswell facility will receive training in oil spill prevention, safe handling procedures of products and wastes, and methods for recognizing and responding to oil spills and waste releases. This training will cover site-specific information, including implementation of this plan. The training will be conducted annually by personnel trained in oil spill prevention, response, and waste management procedures and having familiarity with the Roswell facility. This training will include:

A. Applicable Laws and Regulations
   1. Required spill prevention
   2. Waste handling procedures
   3. Reporting requirements

B. Safe Response Planning
   1. Equipment location
   2. Incompatible materials
   3. Access space
   4. Employee precautions

C. Spill/Release Prevention
    1. Secondary Containment devices
    2. Containment device maintenance
    3. Inspections
    4. Operational precautions

D. Spill/Release Control Equipment
    1. Proper use and limitations
    2. Inspections

E. Oil and Waste Release Response
    1. Response to minor releases
    2. Response to significant releases

F. OSHA Required Training
    1. Personnel protective equipment
    2. Decontamination procedures
    3. Site safety plan review
    4. Emergency response

Training records for Transwestern personnel are maintained in the master file, which is in the Office Building located on-site. In accordance with 40 CFR 112 (10), Transwestern personnel training documentation and employee records are kept in the files at the district office. These records include; job titles, job descriptions for each position, description of type and amount of training,and records documenting training or job experience.

4.0 OIL SPILL EMERGENCY RESPONSE PLAN

4.1 Objectives - The intent of this plan is to provide the information needed for the proper response to a spill event. Spill response will vary during each spill event, since each spill is unique. As such, no one plan can specifically address all of the different scenarios that can occur during or after a spill or release of oil or waste at this facility. Generally, the Roswell facility could have four types of spill events:

1) Contained Spill - spill inside bermed areas and all material is contained.

2) Controlled Small Spill - spill outside bermed areas but is small enough not to spread off-site.

3) Uncontrolled Spill - that is, a spill of oil or waste large enough to exceed bermed capacity (possibly due to rainfall or fire fighting water) or the spill is outside of bermed area, and the spill goes off site.

4) Reportable Spill - the spill leaves the property, is over 1000 gallons, or the reportable quantity for any material has been exceeded.

There are three main objectives during a spill event. They are:

1. Stop the Source of Leakage,
2. Contain the Leakage and
3. Commence Remedial Action.

The order of priority for the above objectives will vary depending on the events and in what

stage the leak is detected. Tank spills which have breached the containment dike should initially be contained to prevent the oil or wastewater from spreading. For spills associated with fires, remedial action should commence first to prevent the fire from spreading. Consideration should be given to the fact that water used in fire fighting may cause the spill containment systems to overflow. The general plan for oil spill emergency response consists of four steps. They are:

1. The Spill must be reported to the Emergency Response Supervisor (refer to the Phone Numbers in Attachment No. 4).
2. The Emergency Response Supervisor will determine which outside assistance organizations to contact, if any, how to stop the leak, how to contain the leak, and what form of remedial action is necessary, he will then initiate the necessary activities.
3. The Emergency Response Supervisor will notify the OCD and determine which additional government agencies are required to be notified and ensure that these notifications are made.

4.2 Equipment Location - The equipment available on-site and the location of each item is provided in Attachment No. 5. The location of this equipment is also shown on the facility plot plan provided in Attachment No. 1. Other information which may be useful during an emergency event is provided below:

- There are several hand held radios available at the facility, which would be useful for communications.

- o The company cars are equipped with radios which can be used to contact outside assistance.
- o Outside contractors are available to provide personnel and equipment. A listing of local contractors is provided in Attachment No. 6.

4.3 Supervisor Response - After receiving a report of a spill, leak or other emergency the Emergency Response Supervisor shall determine the following:

1. Exact location of spill, leak or other emergency event.
2. Extent of injuries (if any).
3. Whether the event is still occurring and when first observed.
4. The extent of spill, leak or emergency.
5. Methods to safely control the event.
6. If spill containment devices are working.
7. If there are apparent hazards associated with the event.
8. Which outside contractors will be utilized.
9. Present and predicted weather conditions at the facility.
10. Applicable government agency notifications required.

Based on the above information, the Emergency Response Supervisor will implement the most appropriate spill or release response.

4.4 Other Considerations

4.4.1 Drum Leaks - If a leaking drum is detected,the contents remaining in the drum will

be transferred to an intact drum if this can be done safely. The empty drum will be put in the empty drum storage area for disposal or reclamation. If the contents cannot be safely transferred to another drum, then the leaking drum will be placed in a DOT-approved overpack drum for off-site disposal. Any spillage and clean up materials will also be placed into an overpack drum for disposal. A label will be placed on the overpack drum, identifying the contents and the original date it was placed in storage.

4.4.2 Evacuation of Site - It is not foreseen that any facility release or event would require evacuation. In the event that evacuation is required, the Emergency Response Supervisor will direct the employees as to the route to take and designate a muster point if appropriate.

4.4.3 Arrangements with Local Authorities - This SPCC Plan contains the information that is most pertinent to outside authorities and response organizations. The Emergency Response Supervisors's office contains additional information which will be provided to police, firefighters, hospitals and other emergency response personnel as needed. This information includes Material Safety Data Sheets for stored products at the facility. A copy of this plan may be provided to outside organizations in the event of a spill.

5.0 REPORTING

5.1 Spills - When a discharge of diesel, oil or other products leaves the property a REPORTABLE spill has occurred. The Transwestern Emergency Response Supervisor will evaluate the situation to determine if the spill is a reportable spill. If the spill is a reportable spill, the Emergency Response Supervisor will call National Response Center and the New Mexico Oil Conservation Division to notify them as soon as possible by phone, according to regulatory requirements. Attachment No. 7 includes the information normally requested by the receiving agency. Whenever the facility has "discharged more than 1,000 gallons off property in a single spill event or discharged harmful quantities, as defined in 40 CFR 110, in two spill events occurring within any twelve month period..." the owner or operator of the facility must file a written report of the incident and include a copy of the facility's SPCC plan (see 40 CFR 112.4 in Attachment No. 8 for details).

5.2 Hazardous Materials Releases - If the facility has a fire, explosion or hazardous materials release which could threaten human health or the environment outside the facility, the incident must be reported, following company procedures, to the:

- Local Police and Fire Departments if evacuation is required,
- National Response Center and the New Mexico Oil Conservation Division, and
- Environmental Protection Agency (EPA)

Attachment No. 7 provides the required information for reporting a hazardous waste release to governmental agencies.

5.3 Plan Amendment - In the event this facility has a reportable event, Transwestern Management will review the circumstances causing the event and determine if amendment of this plan is necessary. Every three years the SPCC plan will be reviewed for completeness by Transwestern Management. Further, all future modifications and changes in operations at the Roswell facility which materially affect this plan will be incorporated into a revised plan within 6 months after such changes occur.

ATTACHMENT 1
FACILITY DRAWINGS

ATTACHMENT 2
TANK INFORMATION

Storage Tank Summary

Tank Name	Storage Capacity	Containment Capacity
A. Pipeline Liquids Tank	21,000 gallons	34,815 gallons
B. Oily Wastewater Tank	8,820 gallons	Shared with A.
C. Used Oil Storage Tank	8,820 gallons	28,237 gallons
D. Waste Oil Storage Tank	8,820 gallons	Shared with C.
E. Wash Rack Tank	910 gallons	Curbed and routed to sump
F. Oil Storage Tanks (2)	7,693 gal.(each)	25,600 gallons
G. Gear Oil/ Glycol Tank	7,693 gallons	Shared with F.
H. Gasoline Storage Tank	100 gallons	Concrete pad
I. Diesel Fuel Storage Tank	750 gallons	990 gallons
J. Methanol Storage Tank	1,650 gallons	230 gallons

ATTACHMENT 3
TANK INSPECTION FORMS

TANK INSPECTION FORM

Inspect each tank and containment area for the following:	Y/N	Comments
1. Leaked material from tanks or piping	___	_____
2. Corrosion on tanks	___	_____
3. Corrosion on valves and piping	___	_____
4. Structural damage to tanks or piping	___	_____
5. Water collected in containment area	___	_____
6. Deterioration of containment walls (cracking or corrosion)	___	_____
7. Any unusual odors	___	_____

Tank Name Inspected By Date

ATTACHMENT 4
EMERGENCY RESPONSE SUPERVISORS

ATTACHMENT 5
SPILL RESPONSE EQUIPMENT

Spill Response Equipment

Spill Clean-up Kits are provided to allow quick action to respond to a small spill or leak of material. The kits are placed at various locations within the facility as shown in Attachment 1. Each of the kits contains the following equipment:

a. Sealed drum banded to a two wheeled cart
b. Plastic shovel
c. Respirators(2)
d. Goggles(2)
e. 5 gallon pail of absorbent
f. Oil absorbent pillows(3)
g. Roll of Duct tape
h. Neoprene gloves(2 pairs)
i. Rubber boots
j. Coveralls(2 pairs)

In addition to the Spill Cleanup Kits, Transwestern has the following equipment available to respond to larger spills or incidents:

a. Caterpillar Dozer D-5
b. Bantam Backhoe, track mounted
c. Caterpillar Motor Grader
d. Ford Tractor Backhoe - Front End Loader
e. Ford Tractor Front End Loader w/ accessories
f. Caterpillar forklift 8000
g. 16' Utility Trailer
h. 8 ton Ford Truck LTL 9000
i. 40' Flatbed Float
j. Low-Boy Trailer (2)

This equipment is kept and maintained at the district office located at the Roswell compressor station.

ATTACHMENT 6
OUTSIDE RESPONSE ORGANIZATIONS

Organization	Telephone Number
Fire	911
Police	911
Ambulance	911
Chaves County Sheriff	(505) 624-6500
Eastern New Mexico Medical Center Hospital	(505) 622-8170
Waste Management of Southeast New Mexico	(505) 734-6140

ATTACHMENT 7
REPORTING INFORMATION

VERBAL OIL SPILL REPORTS

The Emergency Response Supervisor will be responsible for seeing that all necessary notifications to governmental agencies are made. The following information is expected in a telephone report of an oil spill:

1. Name and telephone number of person reporting spill.
2. Date, location, and time of spill.
3. Has spill been contained and/or stopped.
4. Where known, the name, address and telephone number of the party responsible for the oil spill. If the facility is responsible for the spill, then provide the following:

Transwestern Pipeline Company
Roswell Compressor Station
6381 North Main
Roswell, New Mexico
Chaves County
(505) 623-8612

5. Location of discharge.
6. Material(s) spilled and quantity lost.
7. What type of clean-up is underway.
8. Personnel injuries and/or fires associated with spill.
9. Fishkill or other environmental damage associated with spill.

NOTE: A written report and a copy of this SPCC plan must be submitted to the EPA within 60 days of spill if more than 1,000 gallons of oil is spilled.

ENRON
Gas Pipeline Operating Company
WESTERN REGIONAL OFFICE
P. O. Box 2018 • Roswell, New Mexico 88201 • (505) 623-2761

August 16, 1990

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088
Land Office Bldg.
Santa Fe, New Mexico 87504-20880

Dear Mr. Anderson:

On behalf of Enron Corporation, operator for Transwestern Pipeline Company, approval by your agency is requested concerning modification in the Discharge Plan for the Roswell Compressor Station No. 9. The facility is located approximately 5 miles north of Roswell, New Mexico in the SW1/4,SW1/4 of sec. 21 and the NW1/4,NW1/4 of sec. 28 in T.9S.,R.24E.

This modification is requested to discharge cooling tower water blowdown from the facilities radiators into an offsite livestock watering tank located immediately adjacent to the east fence boundary in the quadrats described above (see attached map).

We are at present discharging the industrial water into an above ground tank and hauling this water offsite for disposal by Enron Oil Trading and Transportation (EOTT).

For your review, please find the following information:

1) Chemical analyses of a water sample collected from the cooling water blowdown.

2) A letter from Mr. Bert Marley, lessee of the State owned lands for which this discharge is proposed, requesting this water to be discharged into his stock tank.

3) Geologic and hydrologic information from a monitoring well located onsite and accompanying water quality analyses.

4) Location of the proposed discharge point.

Our present discharge rate has been estimated at 1,000 gallons per day when in operation. We anticipate this rate to fluctuate during the year with summer months requiring larger discharge volumes than the fall and winter months when the cooling towers are removed from operation and no proposed discharges will occur.

If you may require any additional information, please contact me at 623-2761 ext. 222.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Bill Nolan
Rich Jolly
Grant Rogers
Terry Doyle

NEW MEXICO STATE UNIVERSITY
SOIL & WATER TESTING LAB.
BOX 3Q NMSU
LAS CRUCES, NEW MEXICO 88003

CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

F1784(02/84)

Date received 7-18-90. Lab No. 2461 user code No.

TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: *Check individual items for analysis [Mark appropriate box(es)]*

INTERIM PRIMARY PARAMETER GROUP: ☒ 1 ☐ 2 ☒ 3

TYPE of CHEMICAL ANALYSIS: ☐ Complete Secondary

Water Supply System Name	Water Supply System Code No. Sample #4	City or Location / County	Check one: ☐ TREATED WATER ☐ RAW WATER
Collection Date 7-6-90	Collection Time 1:15	Collection Point Permit #RA-5540	Collector's remarks Pecos Valley Artesian Conservancy Observation Well
Collected By	Owner		Report to Larry Campbell Address P.O. Box 2018 Roswell, NM 88201

TYPE of SYSTEM *(Check one)*: ☐ PRIVATE PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other *(specify)*

LAT. ° ' "
LONG ° ' "

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL		HEAVY METALS	mg/l	PARAMETER	mg/L	PARAMETER	mg/l
☒ Sodium (as Na)	2440	☒ Chloride (as Cl)	4532	☒ Total Filterable Residue	mg/l 1551	☒ Arsenic	.001	☒ Cu	<.02		
☒ Potassium (as K)	176	☒ Fluoride (as F)	.74	☐ Foaming Agents (as Las)	.	☒ Barium	.05	☒ Zn	<.01		
☒ Tot.Hardness (as CaCO3)	520	☒ Nitrate (as N)	.22	☐ Conductance Micromhos 25°C	2060	☒ Cadmium	<.005	☒ Al	<.1		
☒ Calcium (as Ca)	162.1	☒ Alkalinity (as $CaCO_3$)	20	☒ pH	7.09	☒ Chromium	<.02	☒ B	<.01		
☒ Magnesium (as Mg)	28.1	☒ Bicarbonate (as HCO_3)	24.4	☐ Odor		☒ Lead	<.005	☒ Cd	<.02		
☒ Iron-Total (as Fe)	.95	☒ Carbonate (as CO_3)	0.0	☐ Color	mg/l .	☒ Mercury	<.0002	☒ Mo	<.05		
☒ Manganese (as Mn)	.04	☒ Sulfate (as SO_4)	391.9	☐ Turbidity	.	☒ Selenium	.003	☒ Ni	<.05		
						☒ Silver	<.02				

LABORATORY REMARKS:

Reviewed by Andrew Lee Bustos
Date reported 8-7-90

DISTRIBUTION: White - Water Supply Regulation, SF • Canary • WS System • Pink - EIA Regional Office • Goldenrod Lab

0284PDC200

PRIMARY DRINKING WATER PARAMETERS

PARAMETER	Maximum Concentration mg/liter (ppm)	ANALYTICAL METHOD USED
Arsenic	0.05	
Barium	1.00	
Cadmium	0.010	Atomic Absorption EPA Methods March 1979
Chromium	0.05	
Lead	0.05	
Mercury	0.002	
Selenium	0.01	
Silver	0.05	
Nitrate (as N)	10.0	Automated Cadmium Reduction EPA Methods March 1979

FLUORIDE
Annual Ave. of Max. Air Temp.

Degrees Fahrenheit	Degrees Celsius	Maximum Concentration Used	Analytical Method Used
53.7 & Below	12.0 & Below	2.4	Electrode Method EPA Methods March 1979
53.8 to 58.3	12.1 to 14.6	2.2	
58.4 to 63.8	14.7 to 17.6	2.0	
63.9 to 70.6	17.7 to 21.4	1.8	
70.7 to 79.2	21.5 to 26.2	1.6	
79.3 to 90.5	26.3 to 32.5	1.4	

DEFINITIONS:

The term Group 1--Primary Parameter Chemical Analysis shall mean that the following parameters will be determined: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, and Silver. Preserve with nitric acid.

The term Group 2--Primary Parameter Chemical Analysis shall mean that the following parameter will be determined: Nitrate only. Preserve with sulfuric acid.

The term Group 3--Primary Parameter Chemical Analysis shall mean that the following parameters will be determined: Fluoride only. No preservatives.

The term complete secondary chemical analysis shall mean that the following parameters will be determined: Sodium, Potassium, Total Hardness, Calcium, Magnesium, Iron, Manganese, Chloride, Alkalinity, pH, Bicarbonate, Carbonate, Sulfate, Total Filterable Residue, Conductance, Odor, Color, Turbidity, and Foaming Agents. No preservatives.

The following recommended concentrations or ranges for secondary parameters are provided as a guide:

PARAMETER	mg/LITER
Alkalinity	30-500.0
Bicarbonate	700.0
Calcium	75-200.0
Carbonate	350.0
Chloride	250.0
Color	15 units
Odor	3 units
Conductance	1,000 Micromhos
Hardness	250
Iron	0.3
Magnesium	125.0
Manganese	0.05
pH	6.0-8.5
Potassium	1,000
Sodium	200.0
Sulfate	250.0
Turbidity (field test)	1-5 T.U.

NEW MEXICO STATE UNIVERSITY
SOIL & WATER TESTING LAB.
BOX 3Q NMSU
LAS CRUCES, NEW MEXICO 83003

CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

F1784(02/84)

Date received 7-18-90 | Lab No 2462 | user code No.

TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: *Check individual items for analysis [Mark appropriate box(es)]*

INTERIM PRIMARY PARAMETER GROUP ☒ 1 ☒ 2 ☒ 3

TYPE of CHEMICAL ANALYSIS ☐ Complete Secondary

Water Supply System Name	Water Supply System Code No. Sample B	City or Location / County	Check one: ☐ TREATED WATER ☐ RAW WATER
Collection Date 7-16-90 / Collection Time 1:30PM	Collection Point	Collector's remarks Spill water from Station 9 Engine Room Evaporative Cooler	Report to Cary Campbell Address P.O. Box 208 Roswell, NM 88201
Collected By	Owner		

TYPE of SYSTEM *(Check one)* ☐ PRIVATE PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other *(specify)* LAT. LONG

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL		HEAVY METALS	mg/l	PARAMETER	mg/L	PARAMETER	mg/l
☒ Sodium (as Na)	883	☒ Chloride (as Cl)	450	☒ Total Filterable Residue	mg/l 1254	☒ Arsenic	.001	☒ Cu	<.02		
☒ Potassium (as K)	55	☒ Fluoride (as F)	.83	☐ Foaming Agents (as Las)	.	☒ Barium	<.01	☒ Zn	.05		
☒ Tot.Hardness (as CaCO3)	738	☒ Nitrate (as N)	.21	☐ Conductance Micromhos 25°C	1510	☒ Cadmium	<.005	☒ Al	<.1		
☒ Calcium (as Ca)	197.0	☒ Alkalinity (as $CaCO_3$)	195	☒ pH	8.12	☒ Chromium	<.02	☒ B	<.01		
☒ Magnesium (as Mg)	60.0	☒ Bicarbonate (as HCO_3)	238.0	☐ Odor		☒ Lead	<.005	☒ Co	<.02		
☒ Iron-Total (as Fe)	<.05	☒ Carbonate (as CO_3)	0.0	☐ Color	mg/l .	☒ Mercury	<.0002	☒ Mo	<.05		
☒ Manganese (as Mn)	<.02	☒ Sulfate (as SO_4)	618.5	☐ Turbidity	.	☒ Selenium	.002	☒ Ni	<.05		
						☒ Silver	<.02				

LABORATORY REMARKS:

Reviewed by Andrew Leibnitz

Date reported 8-7-90

DISTRIBUTION: White - Water Supply Regulation, SF • Canary • WS System • Pink - EIA Regional Office • Goldenrod Lab

0284PDC200

PRIMARY DRINKING WATER PARAMETERS

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Mercury	0.002	
Selenium	0.01	
Silver	0.05	
Nitrate (as N)	10.0	Automated Cadmium Reduction EPA Methods March 1979

FLUORIDE
Annual Ave. of Max. Air Temp.

Degrees Fahrenheit	Degrees Celsius	Maximum Concentration Used	Analytical Method Used
53.7 & Below	12.0 & Below	2.4	
53.8 to 58.3	12.1 to 14.6	2.2	
58.4 to 63.8	14.7 to 17.6	2.0	Electrode Method EPA Methods March 1979
63.9 to 70.6	17.7 to 21.4	1.8	
70.7 to 79.2	21.5 to 26.2	1.6	
79.3 to 90.5	26.3 to 32.5	1.4	

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The term Group 3--Primary Parameter Chemical Analysis shall mean that the following parameters will be determined: Fluoride only. No preservatives.

The term complete secondary chemical analysis shall mean that the following parameters will be determined: Sodium, Potassium, Total Hardness, Calcium, Magnesium, Iron, Manganese, Chloride, Alkalinity, pH, Bicarbonate, Carbonate, Sulfate, Total Filterable Residue, Conductance, Odor, Color, Turbidity, and Foaming Agents. No preservatives.

The following recommended concentrations or ranges for secondary parameters were provided as a guide:

PARAMETER	mg/LITER
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Calcium	75-200.0
Carbonate	350.0
Chloride	250.0
Color	15 units
Odor	3 units
Conductance	1,000 Micromhos
Hardness	250
Iron	0.3
Magnesium	125.0
Manganese	0.05
pH	6.0-8.5
Potassium	1,000
Sodium	200.0
Sulfate	250.0
Turbidity (field test)	1-5 T.U.

AFFIDAVIT OF PUBLICATION

County of Chaves
State of New Mexico,

I, Jean M. Pettit

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 the issue dated 8th

October, 1990

and ending with the issue dated 8th

October, 1990

Jean M. Pettit
Manager

Sworn and subscribed to before me

this 8th day of

October, 1990

Marylon S. Shuppee
Notary Public

My commission expires .....

July 21, 1994
(Seal)

Publish October 8, 1990

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERAL 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 application and a renewal application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-38) - New Mexico State University, Benjamin E. Woods, Director, Physical Plant Department, Box 30001, Department 3545, Las Cruces, New Mexico, 88003 001, has submitted an application for renewal of its previously approved discharge plan to discharge cooled geothermal water to an unlined pit at its greenhouse facility located in Section 23, Township 23 South, Range 2 East, NMPM, Dona Ana County, New Mexico. Approximately 54,720 gallons per day of cooled geothermal water with a total dissolved solids concentration of 1775 mg/l win be discharged. The disposed geothermal water will percolate into the ground and will reenter the geothermal reservoir. Uppermost ground water is geothermal and is found at 365 feet with a total dissolved solids concentration of 1636 mg/l. The discharge plan address how spills, leaks and other discharges to the surface will be managed.

(GW-52) - Enron Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 7251-1188, has submitted a discharge plan application for its 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 off site livestock watering tank. The wastewater has a total dissolved solids concentration of 1250 mg/l. Ground water most likely to be affected by an discharge to the surface at the facility or the location of the stock tank is at a depth of 240 feet with a total dissolved solids concentration of 1551 mg/l The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

(GW-53) - Enron Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 77251-1188, has submitted a discharge plan application for its 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 produced water is disposed of in a concrete surface impoundment for evaporation. The wastewater has a total dissolved solids concentration of approximately 1250 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 120 feet with a total dissolved solids concentration from 794 to 875 mg/l. The discharge plan addresses how spills, leaks and other 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. Prior to 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 Santa Fe, New Mexico, on this 2nd day of October, 1990. To be published on or before October 10, 1990.

STATE OF NEW MEXICO OIL
CONSERVATION DIVISON
William J. Lemay
WILLIAM J. LEMAY,
Director

SEAL

scored on a fourth-
ter, 14-yard run. Smith's
age was the most by a Dal-
unning back since Hers-
Walker gained 134 yards
ist Cleveland on Dec.

llas (2-3) staged a
ard drive early in the
h period that was sparked
ommie Agee's run on a
rd screen pass.
ny Testaverde, the NFL's
t prolific current passer
n't bring back the Bucs
who had won three
nt.

olphins 20, Jets 16

Miami, Mark Duper
ht second-half touch-
passes of 69 and 13
s, getting the winning
with 63 seconds left. The
hins (4-1) had trailed 13-0
lftime and are off to their
start since 1985, the last
they made the playoffs.
ook four third-down con-
ns on passes by Dan
o in the 80-yard drive
that ended with Duper's 8-yard
TD. Duper's touchdowns were
the former Pro Bowl receiver's
first in a year.

Bills 38, Raiders 24

At Orchard Park, N.Y., the
Buffalo Bills returned a
blocked kick for a touchdown
in the fourth quarter for the
second straight week, high-
lighting a 24-point rally for a
38-24 victory over the previ-
ously unbeaten Los Angeles
Raiders on Sunday night.

The Bills, scoring three more
points against Los Angeles
than the Raiders had allowed
all season, were down 24-14
before Jamie Loffon caught a
42-yard touchdown pass from
Jim Kelly with 8:37 to go. That
began a span of 24 points in
5:03.

Buffalo forced a punt and
Steve Tasker came through
untouched to block Jeff Gos-
sett's punt from the Raiders'
46. James Williams scooped
up the ball on one bounce and
ran 38 yards for the go-ahead
touchdown with 6:52 left.

ports in brief

ttipaldi outduels Mears

NAZARETH, Pa. (AP) — Emerson Fittipaldi outdueled
ck Mears for victory Sunday in the Bosch Spark Plug
and Prix, a race that saw Al Unser Jr. win his first CART
G Cup championship despite crashing hard midway
rough the 200-lap event at Pennsylvania International
ceway.

Unser, 28, was taken to a hospital in Easton, Pa., for a
ecautionary CAT scan on his head after he walked away
m a three-car crash with what CART doctors called a mild
ncussion.

Unser, a second-generation Indy-car star, had only to fin-
sixth or better Sunday to clinch the $400,000 season
ampionship, but he still won the title with one race
naining when Michael Andretti, the only driver with a
ance of catching him, fought handling problems and
und up fifth.

HS wins, meets RHS

Goddard High and Roswell High meet on the soccer field
DeBremond Stadium at 6 p.m. Tuesday.
Goddard is coming off a 3-1 win over Carlsbad Saturday

CLASSIFIEDADS!622-7710

Legal Notices

Publish Oct 8, 1990

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

Notice is given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application and application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-38) New Mexico State University, Benjamin E. Woods, Director, Physical Plant Department, Box 30001, Department 3545, Las Cruces, New Mexico 88003 001, has submitted an application for renewal of its previously approved discharge plan for discharge cooled geothermal wastewater to a lined pit at its greenhouse facility located in Section 23, Township 23 South, Range 2 East, NMPM, Dona Ana County, New Mexico. Approximately 54,720 gallons per day of cooled geothermal water with a total dissolved solids concentration of 1775 mg/l will be discharged. The disposed geothermal water will percolate into the ground water and reenter the geothermal reservoir. Uppermost ground water is geothermal and is found at 365 feet with a total dissolved solids concentration of 1636 mg/l. The discharge plan address how spills, leaks and other discharges to the surface will be managed.

(GW-) Transwestern Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 77251-1188, has submitted a discharge plan application for its Roswell Compressor Station located in the SW/4 SW/4 Section 21, Township 9 South, Range 24 East, Chaves County, New Mexico. Approximately 1000 gallons per day of wastewater will be transferred to an off site livestock watering pond. The wastewater has a total dissolved solids concentration of 1250 mg/l. Ground water most likely to be affected by an discharge is at a depth of surface at the facility or the location of the stock tank is at feet with a total dissolved solids concentration of 1551 mg/l. The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

(GW-) Transwestern Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 77251-1188, has submitted a discharge plan application for its 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 process wastewater will be disposed of in a concrete surface impoundment for evaporation. The wastewater has a total dissolved solids concentration of approximately 1250 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 120 feet with a total dissolved solids concentration from 794 to 875 mg/l. The discharge plan addresses how spills, leaks and other 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. Prior to 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. Request 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 Santa Fe, New Mexico, on this 2nd day of October, 1990. To be published on or before October 10, 1990.

STATE OF NEW MEXICO OIL
CONSERVATION DIVISON
William J. Lemay
WILLIAM J. LEMAY,
Director

Publish October 8, 15, 1990

FIFTH JUDICIAL DISTRICT
COURT COUNTY OF CHAVES
STATE OF NEW MEXICO

Publish October 1, 8, 15, 22, 1990

FIFTH JUDICIAL DISTRICT
COURT COUNTY OF CHAVES
STATE OF NEW MEXICO
No. CV-90-299

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 application and a renewal application have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-38) - New Mexico State University, Benjamin E. Woods, Director, Physical Plant Department, Box 30001, Department 3545, Las Cruces, New Mexico, 88003-001, has submitted an application for renewal of its previously approved discharge plan to discharge cooled geothermal water to an unlined pit at its greenhouse facility located in Section 23, Township 23 South, Range 2 East, NMPM, Dona Ana County, New Mexico. Approximately 54,720 gallons per day of cooled geothermal water with a total dissolved solids concentration of 1775 mg/l will be discharged. The disposed geothermal water will percolate into the ground and will reenter the geothermal reservoir. Uppermost ground water is geothermal and is found at 365 feet with a total dissolved solids concentration of 1636 mg/l. The discharge plan address how spills, leaks and other discharges to the surface will be managed.

(GW-52) - Enron Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 7251-1188, has submitted a discharge plan application for its 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 1250 mg/l. Ground water most likely to be affected by an discharge to the surface at the facility or the location of the stock tank is at a depth of 240 feet with a total dissolved solids concentration of 1551 mg.l The discharge plan addresses how spills, leaks and other discharges to the surface will be managed.

(GW-53) - Enron Gas Pipeline Operating Company, W. Alan Bowman, Project Environmentalist, P. O. Box 1188, Houston, Texas 77251-1188, has submitted a discharge plan application for its 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 produced water is disposed of in a concrete surface impoundment for evaporation. The wastewater has a total dissolved solids concentration of approximately 1250 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 120 feet with a total dissolved solids concentration from 794 to 875 mg/l. The discharge plan addresses how spills, leaks and other 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. Prior to 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 pubic 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 Santa Fe, New Mexico, on this 2nd day of October, 1990. To be published on or before October 10, 1990.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

S E A L

ENRON
Gas Pipeline Operating Company
WESTERN REGIONAL OFFICE
P. O. Box 2018 • Roswell, New Mexico 88201 • (505) 623-2761

September 26, 1990

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088
Land Office Bldg.
Santa Fe, New Mexico 87504-20880

Dear Mr. Anderson:

As per your request requiring additional information to be submitted for modification in the Discharge Plan for the Roswell Compressor Station No. 9, enclosed please find an analyses of the cooling tower water blowdown for purgeable halocarbons (601) and purgeable aromatics (602).

I hope this information meets with your approval.

If you may any additional information, please contact me at 623-2761, ext. 222.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Bill Nolan
Grant Rogers
Terry Doyle

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

May 7, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-241

Mr. W. Alan Bowman
Enron Gas Pipeline
Operating Company
P. O. Box 1188
Houston, Texas 77251-1188

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

Dear Mr. Bowman:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the above referenced discharge plan application. The plan submittal, dated April 9, 1990, was received by the OCD on April 10, 1990. The following comments and requests for additional information are based on our review of the data provided in the plan and on OCD's site visit of November 27, 1989:

1. In the application you state procedures for spill containment and cleanup will be included in a SPCC plan that is in preparation. When will this document be completed and furnished to the OCD?

2. The application states information OCD requests pertaining to cooling towers was not applicable. During the inspection, a small cooling tower for each compressor was noted. The blowdown for these cooling towers drained to a leach field sump and then to a leach field located on the south side of the facility. Salt spray drift was also observed on the ground around the cooling towers. If use of the cooling towers is to continue, submit a plan and completion timetable to contain the salt spray to prevent salt buildup on the ground. If use of the blowdown sump and leach field are to continue, a determination, through a hydrologic study, that the leachate will not contaminate ground water is required. A commitment to annually clean and inspect the sump for integrity is also required.

3. The OCD is requiring that above grade tanks that contain materials with constituents that can be harmful to fresh water and the environment, if a sudden and catastrophic spill were to occur, to be bermed so that the spill is contained at the site and mitigated immediately. Containment in a small area of at the tank site allows for maximum recovery of fluids and small volumes of contaminants available for infiltration. Without berming the rupture of a tank will spread its contents over a large area minimizing the amount that can be recovered and increasing the surface area of contaminated soil available to leach contaminants. All tanks that contain these types of materials must be bermed to prevent migration of the fluids and decrease the potential for infiltration. The bermed areas shall be large enough to hold one-third more than the volume of the largest vessel or one-third larger than the total volume of all interconnected vessels contained within the berm. In addition, all above ground saddle tanks, such as your diesel tank, should be mounted on a pad with curbing. Please submit a plan with a completion timetable for berming and/or paving and curbing these tanks.

4. None of the sumps at the facility were constructed with leak detection. If it OCD's policy that all below grade facilities now in service that do not have leak detection are required to be visually inspected yearly to insure integrity. A commitment to incorporate leak detection in the design and construction of any replacement or newly constructed facilities is also required.

If you have any questions, please do not hesitate to call me at (505) 827-5884.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD Artesia District Office

ENRON
Gas Pipeline Operating Company
WESTERN REGIONAL OFFICE
P. O. Box 2018 • Roswell, New Mexico 88201 • (505) 623-2761

September 26, 1990

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088
Land Office Bldg.
Santa Fe, New Mexico 87504-20880

Dear Mr. Anderson:

As per your request requiring additional information to be submitted for Discharge Plan GW-52 Application, enclosed please find relevant information pertaining to water quality and hydrology of adjacent wells near the Roswell Compressor Station.

I hope this information meets with your approval.

If you may any additional information, please contact me at 623-2761, ext. 222.

Sincerely,

Larry Campbell

Larry Campbell
Compliance Environmentalist

xc: Terry Doyle

Roswell Station #9 T9S,R24E,Section 21.33 and Section 28.11

A. Hydrologic Features

1. Bodies of water, streams,...

Name	Type	Location	Use
Arroyo/stream	Intermittent	3 sides of station,	drains to gravel 2 miles to SE.
	gravel pit	9.24.21.14 (0.25 miles)	

10 ft deep depression, 24,000 sq.ft. 9.24.21.331 within station
10-20 ft deep depression 1,000,000 sq.ft. 9.24.22.33 (1 mile east)

	pond 20,000 sq.ft.	9.24.21.332	within station
	pond 20,000 sq.ft.	9.24.28.121	east boundary
	pond 10,000 sq.ft.	9.24.29.214	(0.25 miles west)
	pond 40,000 sq.ft.	9.24.20.322	adjacent to well
Oscar White	well	9.24.22.322	(1 mile east)
Hubert Atkins	well	9.24.21.344	(on site or eastern edge)
Cecil Doyle	well	9.24.33.444	(2 miles Southeast)
J.Mclean	well	9.24.27.444	(2 miles Southeast)
H.L.Deering	well	9.24.33.214	(1.5 miles south)

2. Depth to water and TDS of water.

Depth to water:
Artesian Aquifer (1975) 109 feet
Alluvial Aquifer (1983) 50 feet

Chloride Concentration (1978):
Artesian Aquifer = 1000 mg/l
Alluvial Aquifer = > 100 mg/l

Chloride concentration exceeds 1000 mg/l at 4 miles sout and east of station.

At Roswell Municipal wells six miles south of station (1962):
TDS exceeds 1000 mg/l.

3. Ground water flow appears to be to the east and southeast while the area has a very low gradient (i.e. a 10 foot decline over 10 miles).

B. Geologic description of Discharge Site

1. Soil Type (URB) Silty gravelly loam, (Hha) Gypsiferous loam, (BAC) Silty gravelly loam all with a permeability of 0.6 to 2.0 inches per hour.

2. Aquifer Name(s):
A) Shallow Alluvial Aquifer
B) Artesian Aquifer (San Andreas Limestone)

3. Aquifer Composition:
A) Alluvium
B) Limestone with solution cavaties

4. Depth to rock at base of Alluvium is about 60 feet.

References Used:

Dinwiddle, G.A. Municipal water supplies and uses, Southeastern New Mexico, Technical Report 29A, State Engineer, 1963.

Welder, G.E. Geohydrologic Framework of Roswell Basin, Technical report 42, state engineer of New Mexico, 1983.

Chugg, J.C. et. al., Soil Survey of Eddy Area, NM, March 1971, SCS.

Mourant, W.A., Rio Hondo Drainage Basin, Technical Report 28, state engineer, 1963.

Hudson, J. D. and R.L. Bourton, Ground-water Levels in New Mexico 1978-80, basic data report 1983.

Lenfesty, C.D., Survey of Chaves County, New Mexico, Southern Part 1980, SCS.

USGS Topographic Maps
1:100,000 Series
Salt Creek, NM 1979
Roswell, NM 1979
Artesia, NM 1979
1:24,000 Series
Dayton Quadrangle 1975 (Yates Plant)
Artesia " " 1975
Lake McMillan North, NM 1955
Panther Hill 1982 (Station #9)
Melena 1982
Bitter Lake 1975
Roswell North 1975

TABLE 2.

CHEMICAL ANALYSES OF GROUND WATER FROM MUNICIPAL WELLS IN CHAVES COUNTY, N. MEX.

(Analyses by U.S. Geological Survey. Chemical constituents are in parts per million.)

EXPLANATION:

Location number: All locations are south of the New Mexico Base Line (see p. 4).
Stratigraphic unit: Qal, Quaternary alluvium; Psa, San Andres Limestone.
Dissolved solids: Calculated by sum of determined constituents or by residue after evaporation (indicated by letter "a" following number).

Location number	Owner	Principal water-bearing formation	Date collected	Temperature (°F)	Silica (SiO_2)	Iron (Fe)	Calcium (Ca)	Magnesium (Mg)	Sodium (Na)	Potassium (K)	Bicarbonate (HCO_3)	Carbonate (CO_3)	Sulfate (SO_4)	Chloride (Cl)	Fluoride (F)	Nitrate (NO_3)	Dissolved solids	Hardness as $CaCO_3$: Calcium, magnesium	Hardness as $CaCO_3$: Noncarbonate	Percent sodium	Sodium adsorption ratio (SAR)	Specific conductance (micromhos at 25°C)	pH	Remarks
10.23.34.432	City of Roswell	Psa	5-11-51	-	-	-	168	41	54	3.4	237	-	421	58	0.7	7.5	943a	588	394	17	1.0	1,250	7.9	City well 10.
			11-30-57	68	16	-	186	60	59		224	-	472	111	.6	5.9	1,070a	710	527	15	1.0	1,460	7.7	Do.
			8- 2-61	70	-	-	-	-	-		225	0	464	120	-	-	-	680	496	-	-	1,510	7.5	Do.
34.432a	do.	do.	11-30-57	68	16	-	183	53	62		228	-	461	96	.6	5.8	1,040a	674	488	17	1.0	1,400	7.5	City well 11.
			8- 2-61	70	14	0.01	185	51	69		224	0	458	108	.6	5.4	1,040a	670	486	18	1.2	1,450	7.2	Do.
10.24.30.444	do.	do.	9-23-58	68	-	-	191	52	165		219	-	461	271	.5	7.0	1,270	690	511	34	2.7	1,940	7.3	City well 14. Pumped 18 hours before sampling.
			8- 2-61	70	-	-	-	-	-		209	0	467	285	-	-	-	680	508	-	-	1,990	7.5	City well 14.
32.242	do.	do.	6- 9-55	-	15	-	171	54	67		229	-	450	93	.5	5.9	1,160a	648	461	18	1.1	1,390	7.4	City well 6.
			8- 2-61	-	-	-	-	-	-		208	0	482	310	-	-	-	705	534	-	-	2,070	7.4	Do.
32.314	do.	do.	11-30-57	-	16	-	198	56	141		194	-	522	228	.6	8.2	1,260	724	566	30	2.3	1,850	7.7	City well 8.
			8- 2-61	75	14	.03	194	55	139		213	0	479	234	.6	9.0	1,230	710	536	30	2.3	1,860	7.2	Do.
33.114	do.	do.	11-30-57	-	18	-	185	53	196		203	-	457	325	.6	6.5	1,340	680	513	39	3.3	2,080	7.7	City well 7.
			8- 2-61	69	15	.02	191	57	213		198	0	472	362	.7	8.2	1,420	710	548	39	3.5	2,190	7.3	Do.
11.24. 4.114	do.	do.	11-30-57	-	17	-	171	52	219		143	-	491	342	.6	6.8	1,370	640	524	43	3.8	2,100	8.0	City well 1.
			8- 2-61	70	15	.03	207	49	264		199	0	511	418	.7	8.6	1,570	720	557	44	4.3	2,420	7.1	Do.
4.114a	do.	do.	11-30-57	68	16	-	191	53	194		211	-	499	295	.6	7.0	1,360	694	522	38	3.2	2,050	7.4	City well 2.
			8- 2-61	71	-	-	-	-	-		200	0	512	435	-	-	-	730	566	-	-	2,510	7.4	Do.
4.114b	do.	do.	11-30-57	68	19	-	198	56	196		216	-	515	305	.7	7.2	1,400	724	548	37	3.2	2,100	7.6	City well 3.
			8- 2-61	-	-	-	-	-	-		202	0	512	430	-	-	-	725	560	-	-	2,480	7.5	Do.
4.124	do.	do.	11-30-57	-	17	-	194	56	202		211	-	499	322	.6	7.1	1,430a	714	542	38	3.3	2,120	7.8	City well 9.
			8- 2-61	-	-	-	-	-	-		208	0	510	405	-	-	-	735	564	-	-	2,410	7.4	Do.
8.124	do.	do.	3-12-56	69	15	-	175	62	51		227	-	447	103	.9	4.4	970	692	506	14	.8	1,430	8.1	City well 13.
			8- 2-61	71	-	-	-	-	95		223	0	444	157	-	5.1	-	664	482	24	1.6	1,580	7.4	Do.
8.422	do.	do.	8- 4-61	69	13	.01	193	49	98		220	0	462	170	.7	1.2	1,100	690	510	24	1.6	1,630	7.5	City well 15.
16.142	do.	do.	11-30-57	-	16	-	189	54	82		225	-	472	134	.6	6.3	1,110a	694	509	20	1.4	1,520	7.8	City well 12.
			8- 2-61	77	11	1.8	182	53	106		207	0	459	177	.7	2.8	1,140a	670	500	26	1.8	1,630	7.3	Do.
12.25.28.223	Chaves County Housing Corp.	Qal	5- 7-42	-	-	-	130	40	15	2.6	235	-	291	18	.6	2.8	890a	489	296	6	.3	907	-	Orchard Park well 1.
			8- 4-61	67	-	-	-	-	-		214	0	330	26	-	-	-	532	356	-	-	988	7.5	Do.
28.224	do.	do.	4-28-42	-	-	-	122	42	20		194	-	317	21	-	2.5	720a	477	318	8	.4	945	-	Well 2. Standby supply for Orchard Park.
			11-25-55	-	-	-	129	42	20		230	-	307	22	1.0	2.7	640a	494	306	9	.4	931	7.5	Do.
			8- 4-61	74	-	-	-	-	-		217	0	307	24	-	-	-	500	322	-	-	947	7.7	Do.
13.26.17.113	Town of Dexter	do.	4-25-41	-	-	-	389	123	98		212	-	1,190	200	-	-	2,100	1,480	1,300	-	-	2,600	-	Standby well.
17.333	do.	Psa	4- 6-56	-	-	-	137	48	6.4		236	-	322	16	1.0	.3	715a	540	346	3	.1	965	7.8	New well.
			8- 3-61	73	-	-	-	-	-		241	0	329	14	-	-	-	532	335	-	-	971	7.4	Do.
28.114	Greenfield Water Association	do.	4- 4-56	-	-	-	142	50	6.0		234	-	343	15	.9	.6	754a	560	368	2	.1	997	7.1	-
			8- 3-61	-	-	-	-	-	-		236	0	326	16	-	-	-	544	350	-	-	980	7.4	-
34.312	Town of Hagerman	do.	8- 3-61	-	19	.32	152	46	16		233	0	365	20	1.5	0.0	774a	568	377	6	.3	1,030	7.4	Main well.
14.26. 8.433	do.	Qal	6-24-55	67	30	-	197	76	19		177	-	585	62	.7	2.1	1,060	804	659	5	.3	1,400	7.1	Standby well.
			8-17-61	70	-	-	-	-	-		158	0	589	89	-	-	-	810	680	-	-	1,480	7.2	Do.
15.26.20.321	Lake Arthur Water Cooperative	do.	8- 3-61	-	28	.34	500	122	51		193	0	1,530	70	.9	12	2,410	1,750	1,390	6	.5	2,680	7.0	Municipal well.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 3:15	Date 4/10/90

Originating Party	Other Parties
Larry Campbell - ENRON/ Transwestern Pipeline (623-2761	Dave Boyer OCD

Subject: Below Grade Tanks / sumps - requirements for new and existing facilities

Discussion: Called to find out our requirements. Told him that at gas plants, sumps and tanks were addressed during S.P. review. In general, visual integrity for sumps, integrity testing for tanks. Upon replacement, need leak detection.

In other areas, follow OCD rules for below-grade tank replacement. Have general rule for freshwater protection.

Conclusions or Agreements: Told him in absence of specific requirements, company must make own decision based on ~~protection~~ protection of freshwater, site specific characteristics and their assessment of risks involved.

Distribution	Signed
ENRON Roswell file.	D Boyer

ENRECO
LABORATORIES GROUP
6661-A Canyon Drive • Amarillo, Texas 79110 • Telephone (806) 353-4425 • Facsimile (806) 352-6454

ENRECO LAB REPORT

Work Order # 90-09-075

Received: 09/13/90

09/24/90 08:48:33

REPORT TO
ENRON GAS PIPELINE OP. CO.
P. O. BOX 2018
ROSWELL, NM 88201

ATTEN MR. LARRY CAMPBELL

CLIENT ENRON GAS 3 SAMPLES 1
COMPANY ENRON GAS PIPELINE OP. CO.
FACILITY ROSWELL, NM

WORK ID STAT 9 COOLING TOWER BLOWDOWN
TAKEN 09/11/90
TRANS
TYPE WATER
P.O. #
INVOICE under separate cover

PREPARED BY
ENRECO LABORATORIES GROUP
6661-A CANYON DRIVE
AMARILLO, TEXAS 79110

CERTIFIED BY

ATTEN CUSTOMER SERVICES
PHONE (806) 353-4425

CONTACT PATRICK MOON

WE ARE PLEASED TO PROVIDE THIS CERTIFIED REPORT OF ANALYSIS FEEL FREE TO TELEPHONE CUSTOMER SERVICES IF FURTHER ASSISTANCE IS REQUIRED.

SAMPLE IDENTIFICATION

01 S90-0284 COOL TOWER BLWDN

TEST CODES and NAMES used on this workorder

601 PURGEABLE HALOCARBONS
602 PURGEABLE AROMATICS

ENRECO
LABORATORIES GROUP
6661-A Canyon Drive • Amarillo, Texas 79110 • Telephone (806) 353-4425 • Facsimile (806) 352-6454

ENRECO LAB REPORT

Work Order # 90-09-075

Received: 09/13/90

Results by Sample

SAMPLE ID **S90-0284 COOL TOWER BLWDN** FRACTION **01B** TEST CODE **601** NAME **PURGEABLE HALOCARBONS**

Date & Time Collected **09/11/90** Category **STATION 9**

PARAMETER	RESULT	LIMIT	UNITS
BROMODICHLOROMETHANE	<.10	.10	UG/L
BROMOFORM	7.92	.20	UG/L
BROMOMETHANE	ND	nd	UG/L
CARBON TETRACHLORIDE	<.12	.12	UG/L
CHLOROBENZENE	<.25	.25	UG/L
CHLOROETHANE	<.52	.52	UG/L
2-CHLOROETHYLVINYL ETHER	<.13	.13	UG/L
CHLOROFORM	<.05	.05	UG/L
CHLOROMETHANE	<.08	.08	UG/L
DIBROMOCHLOROMETHANE	<.09	.09	UG/L
1,2-DICHLOROBENZENE	<.15	.15	UG/L
1,3-DICHLOROBENZENE	<.32	.32	UG/L
1,4-DICHLOROBENZENE	<.24	.24	UG/L
DICHLORODIFLUOROMETHANE	ND	nd	UG/L
1,1-DICHLOROETHENE	<.13	.13	UG/L
1,2-DICHLOROETHANE	<.03	.03	UG/L
1,1-DICHLOROETHANE	<.07	.07	UG/L
TRANS-1,2-DICHLOROETHENE	<.10	.10	UG/L
1,2-DICHLOROPROPANE	<.04	.04	UG/L
CIS-1,3-DICHLOROPROPENE	ND	nd	UG/L
TRANS-1,3-DICHLOROPROPENE	<.34	.34	UG/L
METHYLENE CHLORIDE	<1	1	UG/L
1,1,2,2-TETRACHLOROETHANE	<.03	.03	UG/L
TETRACHLOROETHENE	<.03	.03	UG/L
1,1,1-TRICHLOROETHANE	<.03	.03	UG/L
1,1,2-TRICHLOROETHANE	<.02	.02	UG/L
TRICHLOROETHENE	<.12	.12	UG/L
TRICHLOROFLUOROMETHANE	ND	nd	UG/L
VINYL CHLORIDE	ND	nd	UG/L

Notes and Definitions for this Report:

DATE RUN 09/20/90

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Received: 09/13/90

ENRECO LAB REPORT
Results by Sample

Work Order # 90-09-075
Continued From Above

SAMPLE ID S90-0284 COOL TOWER BLWDN FRACTION 01B TEST CODE 601 NAME PURGEABLE HALOCARBONS
Date & Time Collected 09/11/90 Category STATION 9

ANALYST WW

ENRECO LABORATORIES GROUP
6661-A Canyon Drive • Amarillo, Texas 79110 • Telephone (806) 353-4425 • Facsimile (806) 352-6454

ENRECO LAB REPORT **Work Order # 90-09-075**

Received: 09/13/90

Results by Sample

SAMPLE ID **S90-0284 COOL TOWER BLWDN** FRACTION **01A** TEST CODE **602** NAME **PURGEABLE AROMATICS**
Date & Time Collected **09/11/90** Category **STATION 9**

	RESULT	LIMIT	UNITS
BENZENE	<0.2	0.2	UG/L
CHLOROBENZENE	<0.2	0.2	UG/L
1,2-DICHLOROBENZENE	<0.4	0.4	UG/L
1,3-DICHLOROBENZENE	<0.4	0.4	UG/L
1,4-DICHLOROBENZENE	<0.3	0.3	UG/L
ETHYLBENZENE	<0.2	0.2	UG/L
TOLUENE	<0.2	0.2	UG/L

Notes and Definitions for this Report:

DATE RUN 09/20/90
ANALYST BMO

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

August 9, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-304

Mr. W. Alan Bowman
Enron Gas Pipeline
Operating Company
P. O. Box 1188
Houston, Texas 77251-1188

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

Dear Mr. Bowman:

The Oil Conservation Division (OCD) has received your request, dated July 24, 1990, for a 90 day extension to November 8, 1990 to discharge without an approved discharge plan.

Based on the information contained in your request, and for good cause shown, an extension to November 8, 1990 to discharge without an approved discharge plan is hereby approved. This extension will allow ENRON to complete and submit a comprehensive SPCC plan.

If you have any questions, please do not hesitate to call Roger Anderson at (505) 827-5884.

Sincerely,

William J. LeMay by David Catanach

William J. LeMay, Director

WJL/RCA/sl

cc: OCD Artesia District Office

ENRON
Gas Pipeline Operating Company

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

July 24, 1990

New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe NM 87501

Attn: Mr. Roger Anderson
Environmental Engineer

Dear Mr. Anderson:

Discharge Plan GW-52 Application
Roswell Compressor Station
Transwestern Pipeline Company

On behalf of Transwestern Pipeline Company, we request an extension of 90 days, or until November 8, 1990, to discharge without an approved discharge plan. Our response to your letter of May 7, 1990, has been delayed while we prepare the SPCC Plan; this explains our need for an extension.

If you require additional information or clarification, please contact me at (713) 853-7303.

Sincerely,

W. Alan Bowman

W. Alan Bowman, PhD, CEP
Project Environmentalist
Environmental Affairs Department

cc Kevin McGlynn
Richard Jolly
Larry Campbell

AND07245wab

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal | Time | Date 7/2/90

Originating Party	Other Parties
Barry Campbell - ENRON Roswell 623-2761	David Boyer

Subject: Discharge from Cooling towers at Roswell-Compressor Station.

Discussion: Mr. Campbell called to say he wanted permission to discharge from the cooling tower(s) to an adjacent stock pond. I discussed what analyses would be necessary, and that the farmer would have to request or OK. I told him that for this to be included as part of the discharge plan and a hydrologic study was necessary as ~~stated~~ stated in OCD's 5/7 letter. After stating this, I asked him if this had been a regular previous method of discharge (it was). I told him that WQCC Rule 3-106. A allowed discharge for 240 days from the date of discharge ~~plan~~ plan notification receipt. That date was December 11, 1989. I told him they can continue to discharge to the farmer or leach field until then.

Conclusions or Agreements*

*Test for VOA & VOH, Cation/Anions, Heavy metals but not Cyanide, PCB's, PAH's, Phenols, or ~~H~~ radioactivity in cooling tower

Distribution: ENRON - Roswell

Signed: David F Boyer

ENRON
Gas Pipeline Operating Company

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

April 9, 1990

New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe NM 87501
Attn: Mr. Roger Anderson
Environmental Engineer

Dear Mr. Anderson:

Discharge Plan GW-52 Application
Roswell Compressor Station
Transwestern Pipeline Company

This Discharge Plan Application for Roswell Compressor Station, located in Chaves County, New Mexico, is being submitted on behalf of Transwestern Pipeline Company. If you require additional information or clarification, please contact me at (713) 853-7303.

I. GENERAL INFORMATION

A. Discharger/Legally Responsible Party

Name: Transwestern Pipeline Company
Roswell Compressor Station
Attn: Grant Rogers

Address: 6381 N. Main Street, Roswell NM 88202

Telephone: (505) 623-8612

B. Local Representative or Contact Person

Same as above.

C. Location of Discharge

Legal Description: Southwest 1/4 of Southwest 1/4 Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico.

A USGS 7.5 minute quadrangle map and a plot plan showing location of discharge, compressor station equipment, and other site information required below, are attached.

Note: All onsite routine discharges are to sumps or above-ground tanks, with subsequent transfer offsite by an appropriate disposal company. No onsite discharges are intentionally allowed to enter surface waters or groundwaters.

D. Type of Natural Gas Operation

This mainline compressor station provides compression for 700 MMscfd of natural gas in the Transwestern system. It receives natural gas through three 24" lines (East Texas Lateral and Panhandle Lateral) and transports it westward through two 30" lines.

E. Copies

Three copies of the discharge plan application are enclosed.

F. Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate, and complete to the best of my knowledge and belief.

Sincerely,

W. Alan Bowman
Project Environmentalist
Environmental Affairs Department

3 Copies

cc Bill Janacek, w/o USGS map
Grant Rogers, w/o USGS map
Richard Jolly, w/o USGS map
Larry Campbell, w/o USGS map

OCD0403wab

II. PLANT FACILITIES

A. Sources and Quantities of Effluent and Fluids
For each source, primary quality type (e.g., high TDS water, hydrocarbons, sewage), estimated quantities, and major additives ,if any, are provided.

1. Scrubbers: A scrubber and mist extractor removes a total of 1,200 barrels per year of pipeline liquids from the gas. These liquids are temporarily stored in an above-ground 500 barrel capacity pipeline liquids tank. The liquid is removed periodically by Enron Oil Trading and Transportation Company (EOTT) and marketed.

2. Boilers: Not applicable.

3. Engine cooling water: Four Cooper-Bessemer Model LSV-16, turbocharged, 4-cycle internal combustion engines drive compressors at the plant. The engines have separate closed-loop radiator systems, circulating a pre-mixed solution of Ambitrol glycol and water; no additives are used.

   Two small Ingersol Rand air compressors, two main Worthington Model PSVG-6 generators, and two Kohler Model 15R82 standby generators, all have similar closed-loop radiator systems (i.e., use pre-mixed coolants, no additives).

   Any coolant removed for engine or compressor maintenance is stored and returned to the units. In the event that the coolant is changed out, the waste material will be removed from the site by an approved disposal company.

4. Cooling tower: Not applicable (engine room has a "swamp cooler" air conditioner; no additives are used).

5. Sewage: Sewage is directed to an onsite septic tank and associated leach fields or pits. The system is completely separate from compressor station effluents with no commingling.

6. Other: There is no truck washing at this compressor station. Rags, "EPA-2000" solvent, and Alpha Blue Tiger soap are used for cleaning. Dow 234 cavitation inhibitor is purchased in 5-gallon cans, as needed. Weeds are controlled by periodic spraying of herbicides by a third party - A-1 Weed Control Company, Hobbs, New Mexico. Indoor pests are controlled by periodic spraying of pesticides by a third-party - Bob Reed Pest Control Company, Roswell, New Mexico.

   Floor drains are discussed in Section II.B.6.

Materials stored and used onsite include: Citgo 1000 oil, Citgo 68 oil, methanol, pre-mixed Dow Ambitrol FL glycol and water, odorant (mercaptans), added to gas consumed onsite, Karl Fisher reagent, gasoline for the fire pump, diesel fuel, Alpha Blue Tiger soap, Western Chemical "EPA-2000" solvent, and Crain degreaser.

B. Quality Characteristics

Characteristics of the individual waste streams are as follows.

1. Scrubbers: Pipeline liquids are received at the compressor station as part of the gas stream. While the liquids are not separated onsite, the hydrocarbon phase is a marketed product. The water phase is produced water; it may contain suspended solids, but it is exempt from hazardous waste regulations.

2. Boilers: Not applicable.

3. Engine cooling water: Coolant consists of a pre-mixed solution of Ambitrol glycol and water. Chemical analysis is unavailable.

4. Cooling tower: Not applicable.

5. Sewage: Not applicable (domestic sewage).

6. Other: Herbicide used is Krozar D.F.; pesticides used are Dursban Low Odor, Fican wettable powder; rodenticides used are Diphacinone, Havoc, and Talon-G; they are administered by contractors, and are not stored onsite.

   Used engine oil is temporarily stored onsite. It is routinely analyzed for the purpose of determining when it needs to be changed out; a typical analysis is attached.

   Floor drains in the engine room collect oily waste-water when oil is washed from the engines, compressors, and generators, and directs it to a sump outside of the engine room; from there, it is directed to the oily waste-water storage tank. Sump is elevated 1' above grade and has a steel lid to prevent rainwater intrusion.

   Floor drain in the wash rack collects liquid and directs it to the wash rack sumps; from there, it is directed to the oily waste-water tank.

   Open sump at south end of property; steel grate; collects evaporative cooler water from the engine-room air conditioner and directs it to a temporary frac-tank.

C. Transfer and Storage of Fluids and Effluents

1. Water and wastewater flow schematics are not applicable because no individual water treatment units exist. Liquid wastes are not discharged onsite; they are stored temporarily and then transferred offsite.

2. Potential water contaminants, which may be discharged to the surface and subsurface within the compressor station, would be associated with sumps, above-ground storage tanks, and connecting underground pipes. Three underground storage tanks (gasoline, diesel fuel, and firepump gasoline) were removed in 1989. Sumps and storage tanks are inspected weekly. Tanks are mounted above-ground on steel I-beams or stands to facilitate inspection. There is no record of leaks; however, there is evidence onsite of minor spills, i.e., stained soil. At the present time, four storage tanks are bermed or curbed. Storage tanks and sumps consist of:

   a. Pipeline liquids tank - 500 barrel capacity; steel-walled; 4' concrete curb and concrete pad with sump, but no drain (if necessary, EOTT would haul rainwater to a disposal well); contains pipeline liquid from scrubbers and mist extractor; liquid is removed from site by Enron Oil Trading and Transportation Company (EOTT).

   b. Oily waste-water storage tank - 210 barrel capacity; steel-walled; 4' concrete curb and concrete pad with sump, but no drain (if necessary, EOTT would haul rainwater to a disposal well); contains liquids from sumps associated with engine room and West Texas pipeline pig receiver and pig washing area; liquids are to be removed from site by a contractor to be selected.

   c. Oily water storage tank - 210 barrel capacity; steel-walled; liquids are to be removed from site by a contractor to be selected.

   d. Used oil storage tank - 210 barrel capacity; steel-walled; 4' concrete curb and concrete pad with sump, but no drain (if necessary, EOTT would haul rainwater to a disposal well); contains oil from engine crankcases and compressors. Oil is removed by EOTT as necessary.

   e. Wash rack tank - 900 gallon capacity; steel-walled with hinged lid; concrete pad; contains sodium hydroxide, "caustic soda", used to clean mechanical parts.

   f. Oil storage tanks - two each 5,250 barrel capacity; 8" concrete curb and gravel pad; contain unused Citgo 1000 oil.

g. Oil storage tank - 2,443 barrel capacity; 8" concrete curb and gravel pad; contain unused Citgo 68 oil. This tank is divided into two parts; the other part contains glycol (see j, below)

h. Gasoline storage tank - 100 gallon capacity; steel walled; concrete pad; contains gasoline for fire pump.

i. Diesel fuel storage tank - 950 gallon capacity; steel walled; 3' concrete curb and concrete pad with sump, but no drain (if necessary, EOTT would haul rainwater to a disposal well); contains diesel fuel.

j. Glycol storage tank - 2,705 gallon capacity; steel-walled; 8" concrete curb and gravel pad; contain unused glycol.

k. Other storage tanks, sumps, and drums - (1) potable water steel standpipe; (2) Alpha Blue Tiger soap fiberglass tank; (3) glassware wash-water tank and sump associated with onsite laboratory dishwasher; (4) odorant drums; (5) Dow 234 cans (5-gallon capacity).

l. Sumps - See discussion in Section II.B.6.

3. Underground wastewater pipes, their age and specification (i.e., wall thickness, fabrication material), are:

a. All underground pipes are designed and constructed like Transwestern's transportation pipelines. They are made of coated steel and connected to the plant's rectifier system for corrosion control. They were installed 30 years ago when the plant was constructed. However, some of them have been replaced recently, e.g., those connecting to the first four storage tanks (a, b, c, and d above). There is no record of leaks. Specifications are:

(1) Pipe from sump north of engine room to oily waste-water storage tank: 3" diameter; Schedule 40; .216" wall thickness. Replaced 1989.

(2) Pipe from engine room to oily water storage tank: 2" diameter; Schedule 40; .154" wall thickness. Replaced 1989.

(3) Pipe from scrubber to pipeline liquids storage tank: 2" diameter; Schedule 40; .154" wall thickness. Replaced 1989.

(4) Pipe from engine room to used oil storage tank: 2" diameter; Schedule 40; .154" wall thickness. Replaced 1989.

(5) Pipes from oil and glycol tanks to engine room: 2" diameter; Schedule 40; .154" wall thickness. Replaced 1980.

(5) Pipe from evaporative coolers to sump at south end of property: 4" diameter; plastic; .250" wall thickness. Installed or replaced 1989.

b. Pipe delivering compressed air from the air compressors to the control room, utility building, and welding shop: 1" diameter; Schedule 80; .179" wall thickness. No other buried pipes are pressurized.

D. Spill/Leak Prevention and Housekeeping Procedures

1. SPCC: Procedures addressing spill containment and cleanup, including proposed schedule for OCD notification of spills, will be described in the compressor station's contingency plan (SPCC); this document is being prepared; a copy will be forwarded to OCD as soon as it is finalized. Information as to whether tanks and sumps are curbed or bermed is presented in Section II.C.2. Drains and sumps are discussed in Section II.B.6. Final disposition of material is:

a. Pipeline liquids from pipeline liquids storage tank, used oil from used oil storage tank, and rainwater from storage tank sumps: Enron Oil Trading and Transportation Company,.P.O. Box 2297, Midland, TX 79702; telephone (915) 687-0783. Pipeline liquids are marketed; used oil is hauled to Lubbock Waste Oil Company, Lubbock, Texas; rainwater is hauled to a saltwater disposal well operated by I&W, and located 14 miles east, and 2 miles south, of Artesia, New Mexico.

b. Liquids from the oily waste-water storage tank and oily water tank: to be hauled off by a contractor to be selected.

c. Cleaning rags, used filters and other solid waste: Waste Management of Southwest New Mexico, P.O. Box 15700, Rio Ranchero, NM 87174; telephone (505) 392-6571. Material is hauled to Chaves County Municipal Landfill, located in Roswell, New Mexico.

2. Housekeeping: Precipitation runoff is directed away from the compressor station facility. Cleanup of routine spills is addressed in Section II.A.6. Information on curbs and berms,

drains, and disposition, are discussed in Sections II.C.2, II.B.6, and II.D.1, respectively.

3. Leak detection: There are no automated systems to detect leaks and ensure integrity of above-ground storage tanks, below-ground sumps, and buried pipes. Above-ground storage tanks are inspected weekly.

4. Injection wells: No injection wells, monitor wells, or potable water wells exist onsite.

III. EFFLUENT DISPOSAL

A. Existing Operations

1. Onsite Facilities.

a. No onsite facilities currently exist for permanent disposal of produced water, sludges, waste oils, solvents, etc. However, a surface impoundment operated onsite until 1986, when it was closed; see Section III.A.1.a.(1) below.

(1) Surface impoundment ("burn pit"): 40 feet by 40 feet by 8 feet-deep; unlined. Used to receive pipeline liquids, used oil, solvents, oily water from sumps, and office trash. During closure, liquids were removed, while sludge was left in place, and covered over.

(2) Leach fields: A leach field is associated with each of three septic tanks, for treating sewage. Each leach field consists of a 100'-long, 4" perforated pipe. The other three septic tanks each drain to a leach pit.

Sewage and compressor station wastes are not commingled. Septic tank sludges have been disposed of by Johnson Septic Tank Company, Roswell, New Mexico, as recently as 1980.

(3) Injection wells: See Section II.D.4.

(4) Drying beds or other pits: Not applicable.

(5) Other onsite disposal (e.g., land application): Not applicable.

b. For each of the disposal methods listed above:

(1) Existing and proposed measures to prevent or retard seepage: see Section III.B.

(2) Location and design of site(s) and method(s) available for sampling: No special provisions are available for sampling.

(3) Monitoring system: There is no monitoring system.

(4) Periodic reporting: No periodic reporting is planned.

(5) Proposed actions: In the event of any accidental spills or containment system failures, action specified in the SPCC would be taken, including reporting events to OCD; see Section III.D.1.

(6) Future operations: No changes are planned.

2. Offsite Disposal.

Offsite disposal of used oil, rainwater from storage tank sumps, and liquids from the oily waste-water storage tank and oily water tank: by EOTT and a contractor to be selected; see Sections II.D.1.a and b.

B. Proposed Modifications

Transwestern has a comprehensive testing program underway to assess the presence of leachates in the soil, including the area of the closed surface impoundment. Upon completion of the testing, Transwestern will remediate any problems that are found.

IV. SITE CHARACTERISTICS

A. Hydrologic Features

1. Bodies of water: arroyo; intermittent stream; located on three sides of site; drains to gravel 2 miles southeast.

2 wells within 1 mile.

1 surface impoundment onsite; closed.

Several depressions, ponds, gravel pit, within 1 mile.

2. Depth and TDS of groundwater: Artesian aquifer - 109' depth (1975); 1,000 mg/l chloride (1978); >1.000 mg/l TDS (1962, Roswell city well, 6 miles south of site).

Shallow alluvial aquifer - 50' depth; >100 mg/l chloride (1978); >1,000 mg/l TDS (1962, Roswell city well, 6 miles south of site).

3. Groundwater flow direction: appears to be east to southeast, at a very low gradient, i.e. 10 foot decline in 10 miles.

(Reference: "Geohydrologic Framework of Roswell Basin," Technical Report 42, New Mexico State Engineer, Santa Fe. New Mexico, 1983.)

B. Geologic Description of Discharge Site

1. Soil types: Silty gravelly loams (URB, BAC), Gypsiferous loam (Hha); all with a permeability of 0.6 to 2.0 inches per hour.

2. Names of aquifers: Artesian; Shallow alluvial.

3. Composition: Artesian - San Andreas limestone with solution cavities.

   Shallow alluvial - alluvium.

4. Depth to rock: 60' at base of alluvium.

C. Flood Protection

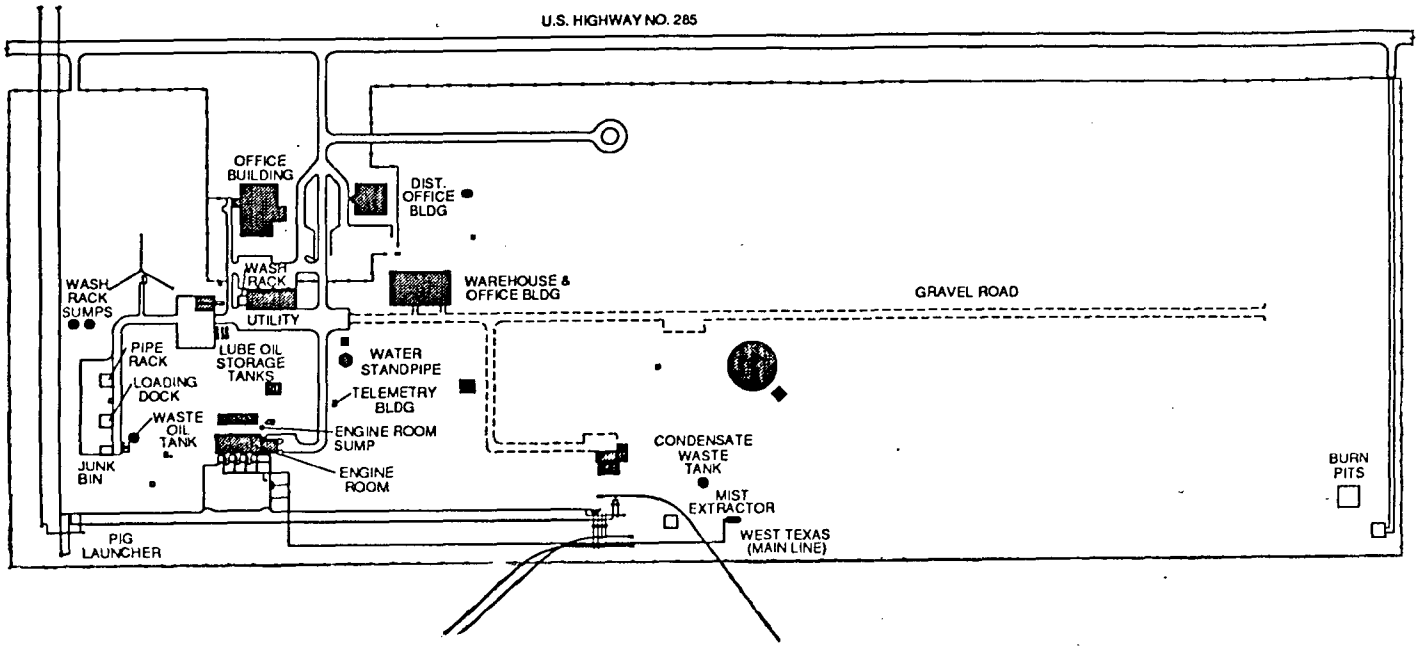
Provide information on:

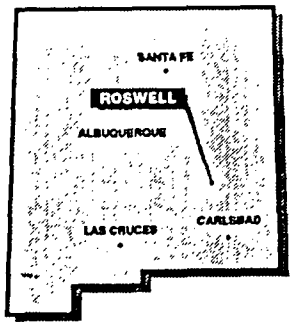
1. Flooding potential: No record of flooding onsite.

2. Flood protection: Curbs and berms are discussed in Section II.C.2.

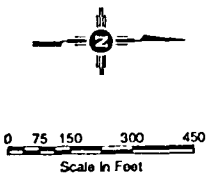
V. ADDITIONAL INFORMATION

To be provided as requested.





STATE OF NEW MEXICO



TRANSWESTERN PIPELINE COMPANY

COMPRESSOR STATION NO. 9

Roswell, New Mexico

Harding Lawson Associates
Engineering and Environmental Services

APPROVED DATE

REVISED DATE

DRAWN AP JOB 10161.009.12

PANTECHS LABORATORIES

☒ P. O. BOX 2439 TEL. 806 669-6821 PAMPA, TEXAS 79066-2439
☐ P. O. BOX 3246 TEL. 806 797-4325 LUBBOCK, TEXAS 79452-3246

September 13, 1989

WASTE CHARACTERIZATION ANALYSIS
for Transwestern Pipeline Company

Lab No: 0263
Sample: Engine Lube Oil Filter from Station #9
Sample Date: 8-17-89
Sampled By: Transwestern

Ignitability: Not required per (40 CFR 261.21)
Corrosivity: Nor required per (40 CFR 261.22)

Reactivity:	mg/kg	Action Level (mg/kg)
Reactive sulfide	13.16	500.0
Reactive cyanide	0.00	250.0

Extraction Procedure Toxicity:

Element	mg/l	Maximum Allowable (mg/l)
Arsenic (As)	0.000	5.0
Barium (Ba)	0.050	100.0
Cadmium (Cd)	0.000	1.0
Chromium (Cr)	0.184	5.0
Lead (Pb)	0.132	5.0
Mercury (Hg)	0.000	0.2
Selenium (Se)	0.000	1.0
Silver (Ag)	0.000	5.0

Analysis By: Jerry Kelly

Distribution; 3 - Transwestern Pipeline Company
P. O. Box 2018
Roswell, NM 88201

Mr. Larry Harrell

PANTECHS LABORATORIES

☒ P. O. BOX 2439 TEL. 806 669-6821 PAMPA, TEXAS 79066-2439
☐ P. O. BOX 3246 TEL. 806 797-4325 LUBBOCK, TEXAS 79452-3246

September 13, 1989

WASTE CHARACTERIZATION ANALYSIS
for Transwestern Pipeline Company

Lab No: 0264
Sample: Western Gear Speed Increaser, Gear Oil Filter - Station #9
Sample Date: 8-17-89
Sampled By: Transwestern

Ignitability: Not required per (40 CFR 261.21)
Corrosivity: Not required per (40 CFR 261.22)

Reactivity:	mg/kg	Action Level (mg/kg)
Reactive sulfide	12.87	500.0
Reactive cyanide	0.00	250.0

Extraction Procedure Toxicity:

Element	mg/l	Maximum Allowable mg/l
Arsenic (As)	0.000	5.0
Barium (Ba)	0.000	100.0
Cadmium (Cd)	0.010	1.0
Chromium (Cr)	0.000	5.0
Lead (Pb)	0.048	5.0
Mercury (Hg)	0.000	0.2
Selenium (Se)	0.000	1.0
Silver (Ag)	0.000	5.0

Analysis By: Jerry Kelly

Distribution: 3 - Transwestern Pipeline Company
P. O. Box 2018
Roswell, NM 88201

Attn: Larry Harrell

PANTECHS LABORATORIES

☒ P. O. BOX 2439 TEL. 806 669-6821 PAMPA, TEXAS 79066-2439
☐ P. O. BOX 3246 TEL. 806 797-4325 LUBBOCK, TEXAS 79452-3246

October 10, 1989

WASTE CHARACTERIZATION ANALYSIS

for Transwestern Pipeline Company

Lab No: 0316
Sample: Kohler Back-Up Generator
Sample Date: 9-22-89
Sampled By: Transwestern

Ignitability: Not required per (40 CFR 261.21)

Corrosivity: Not required per (40 CFR 261.22)

Reactivity:	mg/kg	Action Level (mg/kg)
Reactive sulfide	0.72	500.0
Reactive cyanide	0.00	250.0

Extraction Procedure Toxicity:

Element	mg/l	Maximum Allowable (mg/l)
Arsenic (As)	0.000	5.0
Barium (Ba)	0.000	100.0
Cadmium (Cd)	0.109	1.0
Chromium (Cr)	0.000	5.0
Lead (Pb)	0.147	5.0
Mercury (Hg)	0.000	0.2
Selenium (Se)	0.000	1.0
Silver (Ag)	0.000	5.0

Analysis By: Jerry Kelly

Distribution: 3 - Transwestern Pipeline Company
P. O. Box 2018
Roswell, NM 88201

Mr. Larry Harrell

PANTECHS LABORATORIES

☒ P. O. BOX 2439 TEL. 806 669-6821 PAMPA, TEXAS 79066-2439
☐ P. O. BOX 3246 TEL. 806 797-4325 LUBBOCK, TEXAS 79452-3246

October 10, 1989

WASTE CHARACTERIZATION ANALYSIS

for Transwestern Pipeline Company

Lab No: 0315
Sample: Waukesha Back - Up Air Compressor Engine
Sample Date: 9-22-89
Sampled By: Transwestern

Ignitability: Not required per (40 CFR 261.21)

Corrosivity: Not required per (40 CFR 261.22)

Reactivity:	mg/kg	Action Level (mg/kg)
Reactive sulfide	0.09	500.0
Reactive cyanide	0.00	250.0

Extraction Procedure Toxicity:

Element	mg/l	Maximum Allowable (mg/l)
Arsenic (As)	0.000	5.0
Barium (Ba)	0.000	100.0
Cadmium (Cd)	0.000	1.0
Chromium (Cr)	0.157	5.0
Lead (Pb)	0.098	5.0
Mercury (Hg)	0.000	0.2
Selenium (Se)	0.000	1.0
Silver (Ag)	0.000	5.0

Analysis By: Jerry Kelly

Distribution: 3 - Transwestern Pipeline Company
P. O. Box 2018
Roswell, NM 88201

Mr. Larry Harrell

PANTECHS LABORATORIES

☒ P. O. BOX 2439 TEL. 806 669-6821 PAMPA, TEXAS 79066-2439
☐ P. O. BOX 3246 TEL. 806 797-4325 LUBBOCK, TEXAS 79452-3246

October 10, 1989

WASTE CHARACTERIZATION ANALYSIS

for Transwestern Pipeline Company

Lab No: 0314
Sample: Ingersol-Rand Generator
Sample Date: 9-22-89
Sampled By: Transwestern

Ignitability: Not required per (40 CFR 261.21)

Corrosivity: Not required per (40 CFR 261.22)

Reactivity:	mg/kg	Action Level (mg/kg)
Reactive sulfide	1.01	500.0
Reactive cyanide	0.00	250.0

Extraction Procedure Toxicity:

Element	mg/l	Maximum Allowable (mg/l)
Arsenic (As)	0.000	5.0
Barium (Ba)	0.000	100.0
Cadmium (Cd)	0.004	1.0
Chromium (Cr)	0.208	5.0
Lead (Pb)	0.114	5.0
Mercury (Hg)	0.000	0.2
Selenium (Se)	0.000	1.0
Silver (Ag)	0.000	5.0

Analysis By: Jerry Kelly

Distribution: 3 - Transwestern Pipeline Company
P. O. Box 2018
Roswell, NM 88201

Mr. Larry Harrell

ENRON CORP

file MPL

Interoffice Memorandum

To: Bill Nolan

From: Gene L. Doggett

Department: Rights-of-Way & Land Dept.

Subject: MPL 1 - Station #9 Water Discharge
Sec. 21, T9S, R24E
Chaves Co., N.M.

Date: May 18, 1989

Attached is letter, per your request, from Mr. Bert Marley concerning the water discharge at the East side of the Station property.

If I can be of further assistance, please advise.

GLD/gyw
att

xc: Jimmie Carter
Johnny McGee
File

Date 5-18-89

Transwestern Pipeline Company
P.O. Box 1718
Roswell, N.M. 88202

Re: MPL-1
Grass Lessee
Sec. 21, T9S, R24E
Chaves Co., N.M.

Dear Sirs:

I have been lessee of the subject State of New Mexico lands in excess of 20 years and am presently grazing several head of cattle on this property. These cattle drink from the station fresh water discharge pond located on the East side of the Transwestern Station and have done so for several years. I believe it to be pure and clean and the pond is always clear of any debris and maintaines a constant level.

As there is little water in the area, this water is appreciated and needed by me for my livestock. I would not like to see the flow discontinued for any reason. Also this is listed as an improvement to the property by the State.

Sincerely,

Bert French Marley

Bert French Marley
Rt 1, 71 Marley Rd.
Roswell, N.M. 88201

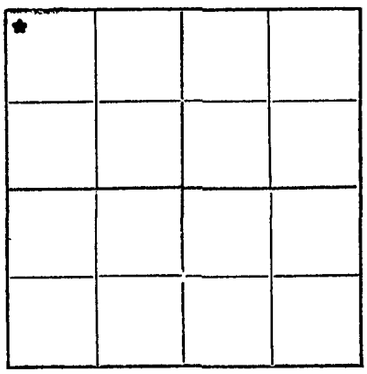
Form WR-23 STATE ENGINEER OFFICE

Transwestern

WELL RECORD

INSTRUCTIONS: This form should be executed in triplicate, preferably typewritten, and submitted to the nearest district office of the State Engineer. All sections, except Section 5, shall be answered as completely and accurately as possible when any well is drilled, repaired or deepened. When this form is used as a plugging record, only Section 1A and Section 5 need be completed.

Section 1



(Plat of 640 acres)

(A) Owner of well Pecos Valley Artesian Conservancy Dist.
Street and Number P. O. Box 1346
City Roswell, State New Mexico
Well was drilled under Permit No. RA-5540 and is located in the
NW ¼ NW ¼ NW ¼ of Section 28 Twp. 9 S Rge. 24 E
(B) Drilling Contractor P.V.A.C.D. License No. WD 190
Street and Number same as above
City State
Drilling was commenced September 17, 1969
Drilling was completed October 23, 1969

Elevation at top of casing in feet above sea level Total depth of well 352 feet
State whether well is shallow or artesian artesian Depth to water upon completion 85.80

Section 2 PRINCIPAL WATER-BEARING STRATA

No.	Depth in Feet From	Depth in Feet To	Thickness in Feet	Description of Water-Bearing Formation
1	92	240	148	Rough Rock
2	249	352	103	Water Rock (rough)
3				
4				
5				

Section 3 RECORD OF CASING

Dia in.	Pounds ft.	Threads in	Depth Top	Depth Bottom	Feet	Type Shoe	Perforations From	Perforations To
9-5/8	32		0	240	240	Halliburton	None	

Section 4 RECORD OF MUDDING AND CEMENTING

Depth in Feet From	Depth in Feet To	Diameter Hole in in.	Tons Clay	No. Sacks of Cement	Methods Used
0	240	12¼	220	150	Denton Well Cementing Co.

Section 5 PLUGGING RECORD

Name of Plugging Contractor License No.
Street and Number City State
Tons of Clay used Tons of Roughage used Type of roughage
Plugging method used Date Plugged 19
Plugging approved by:

Basin Supervisor

Cement Plugs were placed as follows:

No.	Depth of Plug From	Depth of Plug To	No. of Sacks Used

FOR USE OF STATE ENGINEER ONLY

Date Received

File No. Use Location No.

Section 6

LOG OF WELL

Depth in Feet From	Depth in Feet To	Thickness in Feet	Color	Type of Material Encountered
0	8	8		Soil
8	18	10		Sand-Gravel
18	43	25		Clay
43	52	9		Clay & Gravel
52	68	16		Clay & Gyp Rock
68	92	24		Redbed - Gyp Rock
92	150	58		Rough Rock (lost circulation)
150	235	85		1 and 2 foot Drops
235	249	14		Lime (set casing 240')
249	282	33		Lime (water rock)
282	288	6		Hard Lime
288	315	27		Lime (water rock)
315	319	4		Hard Lime
319	352			Lime Rock (water rock)

The undersigned hereby certifies that, to the best of his knowledge and belief, the foregoing is a true and correct record of the above described well.

Well Driller

Charles R. Wyche, Supt.

11

IN REPLY REFER TO

~~UNITED STATES POST OFFICE~~

Transwestern Pipe Line Well

WELL NO. 1 TWP: NW NW NW 28-9-24

Started: Sept. 17, 1969 Completed: Oct. 23, 1969

12 1/4 Hole

0' - 8'	Soil
8' - 18'	Sand - Gravel
18' - 43'	Clay
43' - 52'	Clay - Gravel
52' - 68'	Clay - Gyp Rock
68' - 92'	Redbed - Gyp Rock
92' - 150'	Rough Rock - Lost Circulation
150' - 235'	1' - 2' Drops
235' - 249'	Lime

240' of 9 5/8" Pipe

249' - 282'	Water Rock
282' - 288'	Hard Lime
288' - 315'	Water Rock
315' - 319'	Hard Lime
319' - 352'	Water Rock

240' - 12 1/4" Hole - 112' - 7 5/8" Hole

10-30-69 - Sampled water at T.D. 352' - 290 ppm
well was not pumped

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

R E C O R D E R S

DATE	# OF MEASURES	P.C.	T.W.	B.S.	L.F.D.	O.P.	G.F.	B.L.	C.W.	Z.W.	A.T.
JAN 5 85	1	101.47	84.42	52.91	21.34	24.04	15.71	79.69	-2.00	121.31	92.61
JAN 15 85	2	100.88	83.80	52.20	21.14	22.78	15.41	81.39	-2.00	118.44	90.91
JAN 25 85	3	100.69	83.57	51.98	20.64	22.35	13.81	77.99	-2.00	116.45	88.30
FEB 5 85	4	100.24	83.02	51.43	20.14	21.05	12.61	75.99	-2.00	114.55	86.21
FEB 15 85	5	99.99	82.78	51.29	20.74	21.70	13.21	75.59	-2.00	113.55	85.26
FEB 25 85	6	99.71	82.46	50.95	18.54	23.63	17.11	82.54	-2.00	115.10	85.12
MAR 5 85	7	99.71	82.54	51.66	22.44	31.19	25.66	89.34	13.25	115.05	88.11
MAR 15 85	8	99.93	82.93	53.10	26.04	58.06	62.01	94.09	34.95	131.55	100.87
MAR 25 85	9	100.41	83.11	53.15	28.54	74.20	77.38	138.24	48.96	142.90	113.43
APR 5 85	10	100.84	84.30	56.25	37.74	115.60	126.71	207.69	50.63	156.30	133.56
APR 15 85	11	101.23	84.71	57.29	41.54	74.10	121.01	234.69	62.50	163.65	138.76
APR 25 85	12	101.78	85.53	58.82	41.34	112.77	124.11	218.29	56.86	173.05	142.10
MAY 5 85	13	101.77	85.13	56.28	31.84	68.70	63.66	169.79	22.67	143.23	112.48
MAY 15 85	14	101.28	85.24	57.57	35.54	73.07	100.71	183.44	49.54	146.45	118.95
MAY 25 85	15	101.30	85.40	57.69	34.34	86.58	96.91	189.59	61.00	161.45	133.94
JUN 5 85	16	102.20	85.86	58.31	39.44	111.00	121.81	215.79	52.35	165.65	140.18
JUN 15 85	17	101.97	85.56	56.56	30.54	69.63	75.81	188.79	42.73	152.55	131.23
JUN 25 85	18	101.77	85.55	57.33	36.14	92.68	97.66	184.44	50.44	162.65	139.37
JUL 5 85	19	102.11	86.42	60.37	43.84	128.00	143.61	211.49	59.30	182.65	155.42
JUL 15 85	20	103.09	87.20	61.02	45.24	134.10	147.11	251.49	58.34	184.95	151.22
JUL 25 85	21	102.95	87.20	60.47	44.54	134.44	148.31	236.19	64.22	181.05	152.04
AUG 5 85	22	102.08	86.14	57.55	34.84	98.10	85.57	189.24	23.17	173.00	147.38
AUG 15 85	23	102.20	86.64	59.14	40.54	110.90	114.46	204.59	39.05	179.05	152.62
AUG 25 85	24	102.93	86.89	60.82	39.44	107.37	108.26	209.99	52.41	187.35	156.06
SEP 5 85	25	103.05	87.15	59.75	38.84	101.40	108.21	212.09	58.38	182.60	160.45
SEP 15 85	26	102.03	86.95	59.20	35.24	87.90	92.11	190.79	23.52	168.85	144.55

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

R E C O R D E R S

DATE	# OF MEASURES	P.C.	T.W.	B.S.	L.F.D.	D.F.	G.F.	B.L.	C.W.	Z.W.	A.T.
JAN 5 89	1	87.75	71.63	40.55	10.24	14.14	5.41	70.59	-19.05	96.65	69.61
JAN 15 89	2	87.41	71.27	40.14	9.74	13.43	4.61	70.99	-18.48	95.75	67.74
JAN 25 89	3	87.30	71.09	40.15	9.54	13.63	3.51	70.19	-13.66	93.95	66.75
FEB 5 89	4	87.25	70.87	39.59	9.04	13.02	3.21	68.69	-15.01	91.65	65.88
FEB 15 89	5	87.20	70.67	39.72	9.24	16.70	10.21	69.19	-10.39	91.05	64.39
FEB 25 89	6	87.23	70.53	39.58	9.84	18.61	11.81	74.49	-6.35	97.35	65.53
MAR 5 89	7	86.79	70.30	39.99	10.64	19.83	16.11	98.29	-6.93	95.45	65.33
MAR 15 89	8	86.76	70.85	42.18	17.74	50.10	63.61	133.99	14.45	108.15	76.75
MAR 25 89	9	87.04	71.21	42.46	19.24	69.17	105.61	167.60	36.25	127.30	91.61
APR 5 89	10	87.50	72.23	45.26	26.44	117.60	132.91	230.39	56.75	145.45	111.63
APR 15 89	11	87.99	72.76	46.23	29.04	114.10	133.21	250.29	45.05	153.55	119.20
APR 25 89	12	88.25	73.32	47.31	30.64	118.70	130.61	250.19	41.65	150.15	119.47
MAY 5 89	13	88.71	73.76	47.30	27.24	113.96	120.51	236.79	28.55	146.45	115.70
MAY 15 89	14	88.54	73.59	45.85	25.34	94.35	114.91	214.89	25.05	147.55	116.59
MAY 25 89	15	88.84	74.34	48.87	36.04	117.41	136.91	247.49	56.15	159.95	128.70
JUN 5 89	16	89.24	74.97	48.97	34.54	126.06	133.31	267.30	47.95	164.65	133.20
JUN 15 89	17	90.45	75.43	49.41	34.34	128.79	145.61	263.49	49.05	160.75	127.65
JUN 25 89	18	89.94	75.97	49.94	35.94	138.80	153.56	265.39	45.50	168.35	136.80
JUL 5 89	19	90.14	76.25	51.30	39.54	127.90	147.67	277.49	50.10	169.65	131.46
JUL 15 89	20	90.57	76.63	51.57	37.54	143.37	159.81	280.49	48.85	179.35	149.70
JUL 25 89	21	90.88	76.98	52.83	39.54	150.85	155.21	279.79	49.65	179.05	149.17
AUG 5 89	22	90.69	77.23	53.85	51.35	139.95	150.11	290.19	55.45	182.75	151.95
AUG 15 89	23	90.85	77.01	51.53	33.34	117.35	119.71	265.65	39.70	176.24	145.82
AUG 25 89	24	91.35	77.28	51.37	35.44	114.56	118.01	249.59	48.65	173.75	137.67
SEP 5 89	25	90.91	76.60	49.19	29.04	106.05	114.21	216.89	25.26	161.76	128.89
SEP 15 89	26	90.86	76.43	49.67	25.34	70.47	73.95	209.99	3.21	158.80	132.15
SEP 25 89	27	90.63	76.04	47.42	24.14	73.31	69.11	191.99	10.06	157.84	129.07

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

R E C O R D E R S

SEP 25 85	27	101.36	86.50	58.13	32.14	62.77	67.41	164.04	7.91	153.45	126.16
OCT 5 85	28	101.01	85.82	56.87	29.14	48.39	49.21	145.39	3.13	146.95	118.95
OCT 15 85	29	100.41	84.97	55.01	26.04	44.18	39.21	121.09	0.70	140.85	112.45
OCT 25 85	30	99.76	84.27	54.03	24.34	36.51	30.41	107.09	0.40	135.85	107.25
NOV 5 85	31	99.29	83.54	52.97	22.84	30.15	25.41	96.59	-1.00	131.05	103.06
NOV 15 85	32	99.04	83.12	52.34	21.94	29.36	22.63	93.19	-1.00	127.90	100.55
NOV 25 85	33	98.46	82.60	51.66	21.54	28.29	22.61	89.24	-1.00	124.75	97.48
DEC 5 85	34	98.26	82.35	51.32	21.04	27.33	20.91	85.24	-1.00	122.20	95.64
DEC 15 85	35	97.95	81.86	50.97	18.44	26.35	18.11	81.59	-1.00	121.15	92.79
DEC 25 85	36	97.53	81.47	50.30	19.74	23.52	15.21	80.24	-1.00	117.83	89.35
TOTALS	36	3630.68	3047.00	1996.69	1087.74	2352.19	2440.06	5356.94	918.41	5275.36	4284.81
		100.85	84.64	55.46	30.21	65.34	67.78	148.80	25.51	146.54	119.02

TOTAL TEN 844.15
AVERAGE 84.41

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

R E C O R D E R S

DATE	# OF MEASURES	P.C.	T.W.	B.S.	L.F.D.	C.P.	G.F.	B.L.	C.W.	Z.W.	A.T.
JAN 5 86	1	97.16	81.07	49.91	19.04	23.84	16.41	78.88	-1.00	115.95	87.06
JAN 15 86	2	96.83	80.79	49.67	18.54	21.42	13.11	79.19	-1.00	114.05	85.70
JAN 25 86	3	96.52	80.61	50.33	18.34	22.84	14.51	82.39	-1.00	112.55	84.60
FEB 5 86	4	96.21	80.29	49.04	18.74	25.10	16.06	76.29	-1.00	110.80	83.61
FEB 15 86	5	96.58	80.05	48.57	17.54	19.79	12.21	75.79	-1.00	109.15	81.02
FEB 25 86	6	96.03	79.89	48.90	19.54	27.97	20.51	85.39	-1.00	113.85	82.11
MAR 5 86	7	96.31	79.99	49.78	22.14	39.00	38.01	94.39	9.15	120.20	86.68
MAR 15 86	8	96.24	80.25	50.97	25.74	74.14	80.26	117.44	17.15	121.90	92.93
MAR 25 86	9	96.29	80.54	50.90	27.64	86.21	96.61	144.99	52.49	139.65	103.25
APR 5 86	10	96.77	81.26	52.39	32.54	107.17	121.01	197.29	62.66	149.15	120.90
APR 15 86	11	97.18	82.23	55.74	37.04	113.38	114.91	219.69	64.95	154.45	131.84
APR 25 86	12	97.77	82.84	56.55	36.84	105.86	122.60	214.70	66.31	158.95	131.30
MAY 5 86	13	98.03	82.90	55.24	33.04	93.06	106.81	220.09	28.42	155.05	121.40
MAY 15 86	14	98.15	83.28	57.08	35.94	110.40	118.01	229.19	63.97	159.05	127.46
MAY 25 86	15	98.15	83.56	55.73	38.04	112.18	120.86	213.39	68.44	170.10	140.54
JUN 5 86	16	98.16	83.10	54.67	51.54	91.47	107.21	207.59	52.61	157.40	130.30
JUN 15 86	17	98.52	83.01	54.92	30.94	73.99	82.91	189.75	18.19	147.55	116.82
JUN 25 86	18	98.04	82.69	53.25	26.54	68.57	59.66	160.99	5.15	147.57	114.40
JUL 5 86	19	97.50	81.99	51.95	24.04	50.17	42.31	136.59	4.57	134.55	105.02
JUL 15 86	20	96.95	81.44	52.03	30.04	73.15	72.71	128.59	5.70	131.35	103.93
JUL 25 86	21	97.40	82.06	55.18	38.54	109.67	122.16	183.49	32.17	155.45	119.75
AUG 5 86	22	97.77	82.82	56.82	41.04	121.48	126.96	216.49	60.77	169.45	139.74
AUG 15 86	23	98.19	83.12	56.80	37.54	115.12	120.74	232.49	47.38	167.35	134.69
AUG 25 86	24	98.24	83.02	55.81	35.64	109.65	121.94	238.69	46.41	161.03	132.81
SEP 5 86	25	97.57	82.18	53.51	26.84	53.57	53.41	156.19	3.86	141.75	114.10
SEP 15 86	26	97.30	81.46	52.12	24.44	42.80	38.71	128.79	0.65	133.40	106.27

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

R E C O R D E R S

SEP 25 86	27	97.04	81.08	52.71	24.54	44.59	33.81	114.49	4.34	130.11	104.81
OCT 5 86	28	96.71	80.62	52.52	22.54	41.20	34.61	105.39	-2.00	130.60	103.55
OCT 15 86	29	96.25	80.13	50.54	20.34	30.40	23.11	100.09	-2.00	123.99	97.00
OCT 25 86	30	95.77	79.57	49.81	18.74	25.94	19.06	92.44	-2.00	120.05	93.20
NOV 5 86	31	94.73	78.89	48.93	17.54	22.53	14.91	85.19	-2.00	116.15	87.42
NOV 15 86	32	94.39	78.45	47.35	15.74	20.73	12.56	81.44	-2.00	114.13	87.18
NOV 25 86	33	93.88	77.89	46.66	15.94	19.07	10.61	78.89	-2.00	111.45	84.77
DEC 5 86	34	93.61	77.53	46.23	15.54	19.70	10.91	74.09	-2.00	109.10	82.69
DEC 15 86	35	93.26	77.13	45.73	14.54	17.34	9.66	70.09	-2.00	106.65	79.41
DEC 25 86	36	92.92	76.83	45.24	14.14	16.28	8.78	69.59	-2.00	104.75	77.04
TOTALS	36	3478.42	2914.56	1863.58	947.64	2149.78	2138.83	4980.45	691.34	4818.68	3775.30
		96.62	80.96	51.77	26.32	59.72	59.41	138.35	19.20	133.85	104.87

TOTAL TEN 771.07
AVERAGE 77.11

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

R E C O R D E R S

DATE	# OF MEASURES	P.C.	T.W.	B.S.	L.F.D.	O.P.	G.F.	B.L.	C.W.	Z.W.	A.T.
JAN 5 87	1	92.47	76.33	45.70	13.54	15.20	7.41	67.49	-2.00	103.10	75.50
JAN 15 87	2	92.23	76.04	45.40	13.34	15.81	8.01	66.94	-2.00	99.90	73.41
JAN 25 87	3	91.98	75.77	44.05	12.44	14.26	6.06	65.39	-2.00	97.95	72.18
FEB 5 87	4	91.80	75.54	43.73	12.64	14.47	6.71	67.14	-2.00	97.35	71.45
FEB 15 87	5	91.44	75.08	44.38	12.54	15.22	7.86	68.99	0.00	96.25	71.66
FEB 25 87	6	91.07	74.89	43.07	12.34	13.69	5.01	66.19	-2.00	97.25	72.89
MAR 5 87	7	91.06	74.79	43.35	12.14	17.00	11.66	66.59	0.00	97.65	71.36
MAR 15 87	8	90.92	74.55	43.06	14.44	37.88	46.56	88.44	10.35	100.85	72.80
MAR 25 87	9	91.14	74.98	43.94	19.04	70.10	73.56	117.44	35.60	113.35	80.84
APR 5 87	10	91.21	75.42	45.21	20.04	67.30	71.01	150.39	31.00	126.70	96.99
APR 15 87	11	91.51	75.93	47.00	26.54	81.27	96.66	168.59	42.85	136.50	103.03
APR 25 87	12	92.09	76.62	47.51	27.44	94.06	98.76	189.69	42.78	142.35	116.94
MAY 5 87	13	92.50	77.17	48.70	27.04	92.28	103.54	186.99	31.34	137.52	112.32
MAY 15 87	14	92.36	77.19	48.02	26.34	68.45	75.11	176.29	15.01	133.70	105.12
MAY 25 87	15	92.24	76.85	46.85	22.34	59.53	61.18	142.49	24.50	127.97	100.76
JUN 5 87	16	92.30	76.89	46.44	22.44	80.66	89.51	163.09	32.01	139.70	112.47
JUN 15 87	17	91.90	76.63	46.12	22.48	72.19	74.90	162.59	15.05	134.95	109.75
JUN 25 87	18	92.70	77.45	49.31	30.84	109.10	113.41	171.64	26.61	143.50	115.96
JUL 5 87	19	92.40	77.60	48.70	30.14	103.30	109.41	175.50	48.55	155.05	121.54
JUL 15 87	20	93.02	78.25	50.05	35.54	129.15	148.70	199.00	52.84	161.65	130.91
JUL 25 87	21	93.49	78.80	51.78	34.54	132.20	146.04	247.22	38.62	160.95	127.69
AUG 5 87	22	93.53	78.62	52.45	38.54	135.23	157.31	254.14	57.52	172.26	139.64
AUG 15 87	23	93.14	78.09	51.88	33.44	120.10	127.71	253.68	45.85	164.90	144.25
AUG 25 87	24	93.69	78.17	51.16	30.04	105.54	113.81	236.89	30.53	165.10	136.44
SEP 5 87	25	93.66	78.17	50.53	29.64	70.40	77.46	192.99	14.32	151.75	121.05
SEP 15 87	26	93.53	77.73	49.56	26.94	94.52	98.41	176.59	22.39	151.15	120.66

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

RECORDERS

SEP 25 87	27	93.78	77.41	49.77	26.34	87.91	91.28	175.09	10.82	148.00	117.43
OCT 5 87	28	93.53	77.04	49.36	24.44	60.38	59.31	171.39	3.22	140.40	114.76
OCT 15 87	29	93.00	76.61	48.29	21.94	57.65	57.51	144.94	-2.00	133.35	105.17
OCT 25 87	30	93.09	76.19	47.58	18.54	44.75	40.31	122.39	-2.00	122.75	97.66
NOV 5 87	31	92.80	75.78	46.61	17.44	35.37	30.18	104.62	-2.00	118.45	93.98
NOV 15 87	32	92.17	75.18	45.54	15.84	26.97	22.11	92.43	-2.00	113.95	88.77
NOV 25 87	33	91.87	74.81	45.06	15.74	25.08	19.06	86.09	-2.00	111.72	86.52
DEC 5 87	34	91.56	74.50	44.63	15.04	24.54	16.58	83.89	-2.00	109.38	83.86
DEC 15 87	35	91.05	74.04	44.00	13.74	20.23	12.96	81.59	-2.00	105.65	80.32
DEC 25 87	36	90.63	73.49	43.37	13.04	18.38	11.36	77.24	-2.00	102.95	77.38
TOTALS	36	3322.86	2748.60	1692.16	788.88	2230.17	2296.43	5062.05	605.76	4615.95	3623.46
		92.30	76.35	47.00	21.91	61.95	63.79	140.61	16.83	128.22	100.65

TOTAL TEN 749.61
AVERAGE 74.96

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

R E C O R D E R S

DATE	# OF MEASURES	P.C.	T.W.	B.S.	L.F.D.	O.P.	G.F.	B.L.	C.W.	Z.W.	A.T.
JAN 5 88	1	90.43	73.16	42.87	12.34	17.07	10.21	73.29	-2.00	100.75	75.29
JAN 15 88	2	90.83	72.74	42.39	11.74	15.05	8.16	72.79	-2.00	99.02	72.39
JAN 25 88	3	90.64	73.53	42.07	11.54	14.96	6.21	69.00	-2.00	95.35	70.32
FEB 5 88	4	90.15	72.93	41.39	9.64	12.93	4.71	66.00	-2.00	94.00	68.83
FEB 15 88	5	89.85	72.62	41.01	10.34	12.62	4.61	65.29	-2.00	93.35	66.43
FEB 25 88	6	89.83	72.59	41.20	12.59	16.22	2.21	65.09	-2.00	83.25	66.25
MAR 5 88	7	89.66	72.43	41.35	11.54	18.56	13.61	67.19	-2.00	99.35	68.66
MAR 15 88	8	89.48	72.59	41.99	16.54	39.72	35.01	104.39	2.35	106.25	73.07
MAR 25 88	9	89.87	73.33	44.27	23.44	74.43	82.21	151.19	24.34	124.65	89.64
APR 5 88	10	90.11	73.77	44.31	23.54	97.90	112.11	189.59	33.16	135.25	103.28
APR 15 88	11	90.69	74.60	47.30	29.74	101.10	111.81	214.39	47.95	148.45	116.37
APR 25 88	12	91.04	74.79	45.32	25.84	87.30	92.31	215.79	35.36	142.25	114.58
MAY 5 88	13	90.43	75.22	47.40	26.04	95.93	99.61	256.89	42.25	142.35	117.89
MAY 15 88	14	90.51	75.26	46.64	27.14	80.59	86.31	208.79	7.85	142.70	113.90
MAY 25 88	15	90.40	75.04	45.93	25.24	88.93	78.91	198.89	33.94	134.95	107.34
JUN 5 88	16	90.33	74.88	45.83	24.54	88.64	101.41	200.19	34.05	140.95	108.68
JUN 15 88	17	90.59	75.68	48.80	31.04	119.60	131.04	228.89	24.46	154.55	118.38
JUN 25 88	18	90.90	76.28	49.88	35.74	124.95	140.34	231.29	53.27	163.55	127.72
JUL 5 88	19	90.63	76.12	48.45	28.34	107.63	116.41	222.89	30.75	138.95	110.94
JUL 15 88	20	90.95	76.21	47.44	30.04	116.90	129.71	219.19	18.40	135.25	105.90
JUL 25 88	21	90.53	75.50	47.00	26.54	91.15	98.11	203.49	10.57	130.15	104.75
AUG 5 88	22	90.80	76.64	50.50	34.54	129.11	157.21	245.69	54.25	164.95	130.60
AUG 15 88	23	91.08	76.63	49.42	30.34	110.47	120.11	247.89	25.65	164.95	133.04
AUG 25 88	24	91.77	77.22	51.56	34.04	119.93	134.01	255.59	37.85	171.55	138.61
SEP 5 88	25	91.38	76.87	49.67	28.34	102.76	93.11	221.19	15.75	172.60	122.63
SEP 15 88	26	91.77	76.83	49.21	30.54	110.73	119.81	211.19	28.65	154.55	125.26
SEP 25 88	27	91.57	76.30	47.42	22.54	76.74	68.61	180.39	-2.00	136.25	107.86

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

RECORDERS

OCT 5 88	28	91.42	76.09	46.70	23.64	63.80	68.81	155.79	-5.35	181.55	102.04
OCT 15 88	29	91.05	75.54	46.34	20.24	52.91	54.61	131.49	-5.75	125.40	95.37
OCT 25 88	30	90.62	75.04	45.18	18.64	40.01	40.11	109.54	-8.08	119.00	90.92
NOV 5 88	31	89.93	74.62	44.30	16.44	39.30	33.39	98.19	-13.28	114.45	86.27
NOV 15 88	32	89.52	73.99	43.47	14.94	33.10	28.81	96.95	-15.01	110.85	83.23
NOV 25 88	33	89.37	73.70	43.04	14.34	28.15	23.41	89.89	-16.74	107.55	80.97
DEC 5 88	34	88.89	73.03	42.36	12.84	21.15	15.71	82.19	-15.59	104.35	76.78
DEC 15 88	35	88.71	72.70	41.81	11.64	18.45	11.61	80.09	-18.48	101.55	74.06
DEC 25 88	36	88.14	72.11	41.15	10.94	16.22	8.11	77.19	-19.05	99.25	72.85
AVERAGES		90.39	74.63	45.42	21.60	66.25	67.85	155.77	11.88	128.73	97.81

TOTAL TEN	760.33
AVERAGE	76.03

PECOS VALLEY ARTESIAN CONSERVANCY DISTRICT

R E C O R D E R S

OCT 5 89	28	90.65	75.58	46.77	22.64	67.80	60.11	174.29	1.40	150.75	124.98
OCT 15 89	29	90.12	75.23	46.45	20.24	47.73	48.91	156.99	-13.09	140.35	110.80
OCT 25 89	30	90.09	74.70	45.04	18.04	46.35	39.51	138.19	-15.93	130.15	104.59
NOV 5 89	31	89.93	74.03	43.97	16.09	37.63	30.71	114.64	-16.17	123.45	96.13
NOV 15 89	32	89.62	73.65	43.81	14.74	29.26	23.71	105.89	-17.55	121.05	96.28
NOV 25 89	33	88.88	73.03	42.67	13.34	23.18	16.91	95.49	-19.63	115.95	88.84
DEC 5 89	34	88.48	72.54	42.01	12.44	21.81	16.66	88.79	-20.44	116.85	88.71
DEC 15 89	35	88.28	72.25	41.57	12.25	18.68	11.81	83.29	-20.32	109.75	88.80
DEC 25 89	36	87.79	71.75	40.42	11.14	16.75	9.81	79.19	-21.48	106.75	80.03
AVERAGES		89.02	73.84	45.71	23.37	73.65	78.15	176.92	15.12	137.46	107.63
										TOTAL TEN	820.87
										AVERAGE	82.09

AVERAGES		89.02	73.84	45.71	23.37	73.65	78.15	176.92	15.12	137.46	107.63
										TOTAL TEN	820.87
										AVERAGE	82.09

TRANSWESTERN RECORDER

Wilson Jones Form 5-12

	5 DATE	6 TIME	7 LEVEL	8	9	10 DATE	11 TIME	12 LEVEL	
1	05-04-84	9:20	89.88			12-26-84	9:00	84.79	1
2	05-14-84	10:45	90.24			01-04-85	11:45	84.42	2
3	05-25-84	8:45	90.17			01-15-85	12:30	83.80	3
4	06-05-84	9:10	89.87			01-25-85	12:55	83.57	4
5	06-15-84	9:00	90.53			02-05-85	11:15	83.02	5
6	06-25-84	9:00	89.87			02-15-85	11:30	82.78	6
7	07-05-84	8:55	89.38			02-25-85	9:10	82.46	7
8	07-16-84	12:55	90.36			03-05-85	8:50	82.54	8
9	07-25-84	9:15	91.33			03-15-85	9:05	82.93	9
10	08-06-84	9:05	91.44			03-25-85	8:55	83.11	10
11	08-15-84	9:05	90.21			04-05-85	9:55	84.30	11
12	08-24-84	8:55	89.72			04-15-85	1:00	84.71	12
13	09-05-84	9:00	89.74			04-25-85	9:00	85.53	13
14	09-14-84	9:00	89.88			05-06-85	9:15	85.13	14
15	09-25-84	9:10	89.79			05-15-85	9:15	85.24	15
16	10-05-84	9:00	88.92			05-24-85	9:15	85.40	16
17	10-15-84	8:55	88.22			06-05-85	9:00	85.86	17
18	10-25-84	9:05	87.70			06-14-85	9:30	85.56	18
19	11-05-84	9:00	87.20			06-25-85	8:55	85.55	19
20	11-15-84	12:40	86.56			07-05-85	9:15	86.42	20
21	11-26-84	12:50	85.91			07-15-85	9:00	87.20	21
22	12-06-84	2:55	85.63			07-25-85	9:00	87.20	22
23	12-17-84	8:50	85.13						23

Transwestern Recorder

Date	Time	Level	Date	Time	Level
02-14-83	1:05	85.75	09-26-83	9:50	93.17
02-25-83	9:30	85.55	10-05-83	9:05	92.63
03-04-83	9:55	85.29	10-14-83	9:20	91.86
03-14-83	10:00	85.66	10-25-83	8:55	91.18
03-25-83	9:30	86.43	11-04-83	9:05	90.34
04-05-83	9:10	87.04	11-15-83	9:10	89.71
04-15-83	9:20	87.31	11-23-83	8:55	89.06
04-25-83	9:35	87.92	12-05-83	12:55	88.45
05-05-83	10:20	88.68	12-15-83	12:50	87.82
05-16-83	10:00	88.94	12-27-83	1:15	87.03
05-25-83	9:25	89.16	01-05-84	12:55	86.78
06-06-83	10:10	89.83	01-16-84	12:55	86.32
06-15-83	9:36	89.50	01-25-84	12:45	86.04
06-25-83	9:45	91.03	02-06-84	1:25	85.71
07-05-83	9:40	91.29	02-15-84	12:50	85.65
07-15-83	9:50	91.91	02-27-84	12:50	85.62
07-25-83	9:30	92.42	03-06-84	8:20	85.59
08-05-83	10:00	93.12	03-15-84	8:55	85.99
08-15-83	9:05	93.18	03-26-84	9:00	86.63
08-25-83	10:05	93.48	04-05-84	9:15	87.45
09-06-83	1:10	93.66	04-16-84	8:55	88.29
09-15-83	9:00	93.51	04-25-84	9:00	89.13

Transwestern Station

Date	Time	Water Level	Date	Time	Water Level
11-25-81	1:20	87.83	07-06-82	9:50	92.02
12-04-81	1:25	87.81	07-15-82	9:40	92.20
12-14-81	1:15	87.15	07-26-82	9:35	92.65
12-23-81	1:15	86.86	08-05-82	9:30	93.28
01-05-82	1:15	86.26	08-16-82	11:40	93.66
01-18-82	8:50	85.85	08-25-82	9:25	93.77
01-25-82	1:15	85.76	09-03-82	10:00	94.05
02-07-82	1:10	85.11	09-15-82	1:45	94.27
02-15-82	1:20	85.04	09-24-82	1:45	93.54
02-25-82	1:20	85.21	10-05-82	1:20	92.36
03-05-82	1:15	85.27	10-15-82	1:30	91.76
03-15-82	10:05	85.77	10-25-82	1:35	91.26
03-25-82	10:50	87.12	11-05-82	1:40	90.47
04-05-82	10:55	87.66	11-15-82	1:25	89.84
04-15-82	9:45	88.61	11-29-82	1:55	89.12
04-26-82	11:25	89.38	12-06-82	1:40	88.92
05-05-82	9:40	89.78	12-15-82	1:20	88.55
05-14-82	9:45	90.13	12-28-82	1:15	87.96
05-25-82	9:35	90.24	01-05-83	1:20	87.44
06-04-82	1:15	91.09	01-14-83	1:10	87.29
06-14-82	9:40	91.49	01-25-83	1:15	86.63
06-25-82	11:10	91.91	02-07-83	1:20	86.13

TRANSWESTERN STATION

Date	Time	Water Level	Date	Time	Water Level
09-05-80	8:40	96.18	04-15-81	8:50	90.07
09-15-80	9:00	94.03	04-24-81	8:50	90.86
09-25-80	1:20	94.33	05-05-81	8:50	90.79
10-06-80	2:05	93.12	05-15-81	10:15	90.16
10-15-80	1:10	92.32	05-25-81	8:50	90.45
10-24-80	1:15	92.04	06-05-81	8:55	91.66
11-05-80	1:30	91.35	06-15-81	8:45	92.32
11-14-80	1:25	90.89	06-25-81	8:45	92.83
11-24-80	1:10	90.33	07-06-81	8:45	92.84
12-05-80	1:30	89.75	07-15-81	9:40	92.41
12-15-80	1:10	89.35	7-24-81	8:45	92.73
12-23-80	1:20	88.98	08-05-81	8:50	92.70
01-05-81	1:55	88.55	08-14-81	11:25	92.49
01-15-81	1:30	88.12	08-25-81	9:00	91.71
01-26-81	1:50	87.71	09-04-81	1:45	92.20
02-05-81	1:10	87.33	09-14-81	1:15	91.00
02-13-81	8:45	87.49	09-25-81	1:20	90.63
02-25-81	9:00	87.04	10-05-81	1:15	90.23
03-05-81	9:25	87.15	10-15-81	1:30	89.77
03-13-81	9:50	87.35	10-26-81	1:20	89.15
03-24-81	1:10	88.28	11-05-81	1:35	88.77
04-06-81	8:50	89.24	11-16-81	1:10	88.24

TRANSWESTERN STATION

Date	Time	Water Level	Date	Time	Water Level
6-14-79	8:55	89.03	01-25-80	8:35	88.14
6-25-79	9:35	89.05	02-05-80	8:40	87.53
7-05-79	9:30	90.70	02-15-80	8:50	87.07
7-13-79	8:45	91.55	02-25-80	8:35	86.88
7-25-79	9:50	90.02	03-05-80	8:40	86.68
8-06-79	8:40	91.70	03-14-80	8:50	86.96
8-15-79	8:30	94.78	03-25-80	8:45	88.53
8-24-79	8:40	94.28	04-04-80	8:30	89.56
9-05-79	8:40	94.08	04-14-80	8:40	89.52
9-14-79	8:30	94.39	04-25-80	8:35	90.71
9-25-79	8:45	94.53	05-05-80	10:55	91.07
10-05-79	1:30	93.73	05-15-80	12:20	91.50
10-15-79	1:20	93.43	05-26-80	8:50	91.38
10-25-79	1:20	92.85	06-05-80	9:40	92.33
11-05-79	1:25	92.23	06-13-80	8:35	93.32
11-15-79	1:15	91.53	06-26-80	8:40	94.20
11-26-79	8:45	90.93	07-03-80	8:45	94.75
12-05-79	8:50	90.53	07-14-80	8:45	95.57
12-15-79	9:45	90.19	07-24-80	1:55	96.98
12-26-79	1:50	89.40	08-05-80	9:05	97.05
01-04-80	8:40	88.96	08-15-80	8:55	96.46
01-15-80	8:30	88.54	08-25-80	8:50	95.92

TRANSWESTERN STATION

DATE	TIME	DATE LEVEL
2-15-78	10:35	87.41
2-24-78	9:20	87.14
3-06-78	10:25	86.33
3-15-78	10:00	87.96
3-27-78	9:30	88.48
4-05-78	10:00	89.86
4-14-78	12:00	91.03
4-25-78	9:45	92.78
5-04-78	11:00	92.71
5-15-78	10:00	92.05
5-25-78	10:30	92.68
6-05-78	11:00	92.70
6-15-78	10:30	92.35
6-25-78	9:45	93.70
7-05-78	9:55	93.21
7-25-78	10:00	94.81
8-04-78	12:00	96.58
8-15-78	10:00	96.14
8-25-78	10:45	95.26
9-05-78	10:00	94.46
9-15-78	10:00	94.37
9-27-78	10:00	93.60
10-05-78	10:00	92.98
10-16-78	10:00	92.20
11-06-78	1:50	90.83
11-15-78	9:30	90.29
11-27-78	10:00	89.67
12-05-78	9:40	88.96
12-15-78	9:40	88.56
12-26-78	11:00	88.20
1-05-79	10:00	87.64
1-15-79	9:20	88.09
1-25-79	9:30	87.56
2-06-79	11:00	87.19
2-15-79	9:30	86.96
2-26-79	9:20	86.57
3-05-79	9:30	86.56
3-15-79	9:30	86.66
3-26-79	10:00	87.33
4-05-79	10:15	87.48
4-16-79	2:30	89.80
4-24-79	1:50	90.43
5-04-79	9:30	90.30
5-15-79	9:30	90.42
5-24-79	9:15	90.22
6-05-79	12:45	89.99

TRANSWESTERN STATION

DATE	TIME	WATER LEVEL	DATE	TIME	WATER LEVEL
11-05-76	10:30	92.25	6-24-77	10:00	94.99
11-15-76	9:30	91.63	7-05-77	9:30	95.60
11-24-76	9:45	91.06	7-15-77	9:30	96.48
12-6-76	9:35	90.49	7-25-77	12:15	96.74
12-15-76	10:00	89.97	8-05-77	10:30	96.65
12-23-76	9:45	89.57	8-15-77	9:30	96.70
1-05-77	9:30	89.00	8-25-77	9:30	95.49
1-14-77	9:30	88.57	9-06-77	10:00	94.52
1-25-77	9:30	88.16	9-15-77	10:00	94.30
2-04-77	9:30	87.86	9-26-77	9:30	94.22
2-14-77	9:30	87.74	10-05-77	10:00	93.91
2-25-77	10:30	87.60	10-14-77	11:35	93.03
3-04-77	11:30	88.39	10-25-77	2:10	93.56
3-14-77	11:00	87.98	11-04-77	10:50	92.50
3-25-77	9:30	89.03	11-15-77	10:00	91.93
4-05-77	9:00	90.55	11-28-77	9:45	90.96
4-15-77	9:30	90.30	12-05-77	9:45	90.49
4-25-77	9:30	90.88	12-15-77	9:20	89.54
5-05-77	9:30	92.10	12-27-77	9:30	89.48
5-16-77	9:30	91.05	1-05-78	9:25	89.00
5-25-77	9:30	91.48	1-16-78	9:30	88.65
6-06-77	9:40	93.15	1-25-78	10:05	88.34
6-15-77	10:30	94.12	2-6-78	10:05	87.32

TRANSWESTERN STATION

DATE	TIME	WATER LEVEL	DATE	TIME	WATER LEVEL
7-14-75	9:15	93.05	3-15-76	9:50	87.01
7-25-75	9:15	92.58	3-25-76	2:20	90.20
8-05-75	9:00	92.13	4-05-76	9:30	89.66
8-15-75	9:00	93.19	4-15-76	9:50	90.54
8-25-75	9:00	93.84	4-26-76	10:00	91.42
9-05-75	9:20	94.56	5-05-76	10:00	91.31
9-15-75	9:25	93.44	5-14-76	9:30	91.43
9-25-75	10:00	92.83			
10-06-75	10:55	92.48	5-25-76	11:45	92.88
10-15-75	11:20	91.87	6-04-76	9:30	93.76
10-24-75	2:00	91.36	6-15-76	9:30	93.51
11-05-75	9:20	90.72	6-25-76	9:30	94.75
11-14-75	10:30	90.40	7-06-76	10:00	95.37
11-25-75	9:00	89.52	7-15-76	9:30	95.20
12-05-75	9:00	89.03	7-26-76	8:45	94.97
12-15-75	9:45	88.74	8-05-76	9:30	95.34
12-19-75	9:00	88.48	8-16-76	9:30	96.98
1-05-76	9:20	87.71	8-25-76	9:30	97.20
1-15-76	9:20	87.43	9-07-76	9:30	97.03
1-26-76	9:00	87.25	9-15-76	9:00	96.10
2-05-76	9:00	87.00	9-24-76	9:30	95.47
2-13-76	9:35	87.05	10-05-76	8:35	94.51
2-25-76	9:45	87.34	10-15-76	1:35	93.68
3-05-76	9:50	87.76	10-25-76	10:20	93.02

TRANSWESTERN STATION

MULTIPLEX COLUMNAR — MADE IN U.S.A.

FORM 5-12

	DATE	TIME	WATER LEVEL		DATE	TIME	WATER LEVEL	
1	4- 5-74	11:00	90.50		11-25-74	9:00	89.69	1
2	4-12-74	1:15	90.84		12- 5-74	9:30	89.05	2
3	4-25-74	1:20	91.34		12-16-74	9:20	88.87	3
4	5-7-74	10:25	91.51		12-20-74	9:00	88.63	4
5	5-15-74	10:00	92.64		1- 6-75	11:20	87.87	5
6	5-24-74	11:15	93.25		1-15-75	9:00	87.55	6
7	6-5-74	11:50	94.44		1-24-75	9:25	87.12	7
8	6-14-74	11:00	95.30		2-5-75	9:30	86.11	8
9	6-25-74	11:05	95.73		2-14-75	10:45	85.70	9
10	7-3-74	11:00	96.72		2-25-75	9:30	85.38	10
11	7-15-74	11:30	97.30		3-05-75	10:30	85.14	11
12	7-25-74	11:30	97.41		3-14-75	9:10	85.22	12
13	8- 5-74	3:10	97.14		3-25-75	9:30	85.94	13
14	8-15-74	10:50	96.44		4-04-75	10:30	87.55	14
15	8-26-74	10:40	96.05		4-14-75	10:30	87.78	15
16	9- 5-74	10:30	95.24		4-28-75	9:30	88.98	16
17	9-16-74	10:45	95.31		5-05-75	10:15	90.56	17
18	9-25-74	10:30	94.21		5-15-75	10:00	90.49	18
19	10- 4-74	10:45	93.33		5-26-75	9:30	90.96	19
20	10-11-74	10:55	92.83		6-05-75	9:30	92.67	20
21	10-25-74	9:00	91.87		6-13-75	10:05	93.00	21
22	11- 5-74	9:20	90.93		6-25-75	12:45	93.57	22
23	11-15-74	9:00	90.21		7-03-75	10:45	92.76	23

TRANSWESTERN STATION

MULTIPLEX COLUMNAR — MADE IN U.S.A.

FORM 5-12

	DATE	TIME	WATER LEVEL		DATE	TIME	WATER LEVEL	
1	1/5/73	2:15	85.65		8/24/73	2:15	94.76	1
2	1/15/73	1:55	85.22		9/5/73	2:10	94.51	2
3	1/24/73	2:00	84.96		9/14/73	3:45	94.96	3
4	2/5/73	1:55	84.52		9/24/73	2:00	92.98	4
5	2/15/73	1:55	84.43		10/9/73	1:55	92.21	5
6	2/26/73	1:55	83.98		10/15/73	2:05	92.52	6
7	3/5/73	2:00	83.96		10/25/73	2:10	91.41	7
8	3/15/73	2:00	84.11		11/ 5/73	1:55	90.71	8
9	3/26/73	2:00	84.55		11/15/73	2:00	90.02	9
10	4/ 5/73	10:40	85.96		11/26/73	12:45	89.53	10
11	4/16/73	1:50	87.60		12/ 5/73	12:45	89.10	11
12	4/25/73	3:45	87.40		12/14/73	12:30	88.63	12
13	5/4/73	1:45	87.96		12/27/73	1:30	87.98	13
14	5/14/73	2:00	88.33		1/ 4/74	2:10	87.59	14
15	5/25/73	1:45	89.30		1-14-74	11:00	87.44	15
16	6/5/73	2:05	90.59		1-25-74	2:00	87.22	16
17	6/15/73	2:00	90.97		2- 5-74	1:50	86.71	17
18	6/25/73	2:10	91.44		2-15-74	11:10	86.89	18
19	7/5/73	1:55	92.51		2-25-74	1:30	86.95	19
20	7/16/73	2:10	92.96		3- 5-74	1:20	87.12	20
21	7/25/73	2:15	92.52		3-15-74	10:45	87.80	21
22	8/6/73	2:05	91.81		3-25-74	1:30	88.70	22
23	8/15/73	2:00	92.82					23

Transwestern STATTION

MULTIPLEX COLUMNAR — MADE IN U.S.A.

FORM 5-12

	DATE	TIME	WATER LEVEL		DATE	TIME	WATER LEVEL	
1	10/5/71	2:10	92.32		5/25/72	1:55	91.32	1
2	10/15/71	2:30	92.72		6/5/72	3:40	92.46	2
3	10/26/71	4:00	90.87		6/15/72	1:50	92.81	3
4	11/5/71	2:00	90.31		6/26/72	1:45	93.21	4
5	11/15/71	2:10	89.70		7/5/72	1:50	93.87	5
6	11/26/71	2:00	89.13		7/14/72	1:45	93.89	6
7	12/6/71	2:05	88.53		7/25/72	2:30	94.28	7
8	12/14/71	1:50	88.14		8/4/72	1:50	96.29	8
9	12/23/71	1:55	87.89		8/15/72	2:30	95.94	9
10	1/5/72	1:45	87.22		8/25/72	2:30	96.12	10
11	1/14/72	1:55	87.16		9/6/72	3:00	91.92	11
12	1/25/72	2:10	85.99		9/18/72	2:15	91.50	12
13	2/5/72	2:05	85.79		9/25/72	3:00	90.81	13
14	2/14/72	2:00	85.50		10/2/72	2:50	90.40	14
15	2/25/72	2:10	85.72		10/5/72	2:45	90.51	15
16	3/6/72	2:00	86.18		10/16/72	3:30	89.98	16
17	3/15/72	2:05	84.60		10/25/72	2:30	89.44	17
18	3/24/72	1:50	86.65		11/6/72	2:00	88.76	18
19	4/5/72	2:25	87.90		11/15/72	2:15	87.98	19
20	4/14/72	11:15	89.25		11/27/72	2:30	87.35	20
21	4/25/72	1:40	90.15		12/5/72	3:00	86.96	21
22	5/5/72	1:45	90.74		12/15/72	2:20	86.74	22
23	5/15/72	1:50	90.96		12/26/72	2:15	86.10	23

TRANSWESTERN STATION

MULTIPLEX COLUMNAR — MADE IN U.S.A.

FORM 5-12

	Date	Time	WATER LEVEL	DATE	TIME	WATER LEVEL	
1	7/24/70	8:45	87.69	3/5/71	1:50	84.57	1
2	8/5/70	3:00	87.82	3/15/71	1:55	84.64	2
3	8/13/70	3:35	87.39	3/25/71	1:35	84.98	3
4	8/25/70	10:00	88.16	4/6/71	2:00	86.28	4
5	9/4/70	2:00	88.51	4/15/71	1:55	86.97	5
6	9/14/70	1:00	88.98	4/23/71	2:05	86.85	6
7	9/25/70	2:00	89.21	5/5/71	2:10	87.68	7
8	10/5/70	1:45	87.93	5/14/71	1:55	87.95	8
9	10/15/70	1:45	87.57	5/25/71	1:45	88.47	9
10	10/26/70	1:45	87.17	6/4/71	1;50	88.33	10
11	11/5/70	1:45	86.63	6/14/71	10:40	93.35	11
12	11/16/70	1:45	85.94	6/24/71	4:35	95.60	12
13	11/25/70	1:45	85.72	7/7/71	1:45	93.91	13
14	12/4/70	1;45	85.44	7/15/71	2:15	94.56	14
15	12/14/70	1:45	84.87	7/26/71	1:50	95.48	15
16	12/23/70	1:45	84.41	8/5/71	2;10	93.64	16
17	1/5/71	1:45	84.34	8/12/71	2:05	92.86	17
18	1/15/71	1:45	83.52	8/16/71	1:55	92.45	18
19	1/26/71	1:45	83.74	8/25/71	2:00	92.07	19
20	2/5/71	1:45	83.34	9/3/71	1:50	92.01	20
21	2/12/71	1:45	83.47	9/15/71	2:10	92.89	21
22	2/25/71	1:45	83.46	9/27/71	2:00	92.44	22
23							23

TRANSWESTERN STATION

MULTIPLEX COLUMNAR — MADE IN U.S.A

FORM 5-12

	DATE	TIME	WATER LEVEL		DATE	TIME	WATER LEVEL	
1	11-5-69	2:00	84.96		3/31/70	12:05	82.95	1
2	11-14-69	1:40	84.50		4/6/70	2:00	83.49	2
3	11-25-69	9:20	83.82		4/10/70	2:15	83.81	3
4	12-5-69	2:15	78.06		4/14/70	10:25	83.91	4
5	12-15-69	3:00	73.62		4/20/70	12:15	84.32	5
6	12-24-69	8:55	72.23		4/24/70	11:40	84.45	6
7	1-5-70	1:30	85 65.29		5/1/70	----	94.95	7
8	1-9-70	9:25	85 65.09		5/5/70	3:00	83.80	8
9	1-16-70	3:10	84 84.01		5/11/70	2:00	83.83	9
10	1-20-70	2:00	83 83.82		5/15/70	1:50	83.95	10
11	1-26-70	2:00	83 83.66		5/20/70	2:25	84.62	11
12	2-2-70	2:25	83 83.52		5/25/70	2:00	84.73	12
13	2/5/70	2:00	83 83.38		6/1/70	1:55	84.80	13
14	2/10/70	1:55	83 83.16		6/5/70	2:10	85.11	14
15	2/16/70	11:35	83 83.17		6/10/70	2:30	85.12	15
16	2/20/70	1:45	83 83.19		6/15/70	2:10	85.29	16
17	2/25/70	2:00	83 83.34		6/19/70	1:45	86.18	17
18	3/5/70	1:50	80.71		6/25/70	1;55	85.73	18
19	3/10/70	2:10	81.10		7/1/70	1:45	85.85	19
20	3/16/70	1:55	81.54		7/6/70	12:25	85.60	20
21	3/20/70	1:50	81.96		7/10/70	9:20	86.04	21
22	3/25/70	----	82.53		7/15/70	9:30	86.76	22
23								23

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

PANTHER HILL QUADRANGLE
NEW MEXICO-CHAVES CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

Mapped, edited, and published by the Geological Survey

Control by USGS and USC&GS

Topography by photogrammetric methods from aerial photographs taken 1961. Field checked 1962

Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, east zone
1000-meter Universal Transverse Mercator grid ticks, zone 13, shown in blue

Fine red dashed lines indicate selected fence lines

UTM GRID AND 1962 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24000

CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
DATUM IS MEAN SEA LEVEL

ROAD CLASSIFICATION
Heavy-duty ——— Light-duty ———
Unimproved dirt = = = = = =
U.S. Route

NEW MEXICO
QUADRANGLE LOCATION

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER 25, COLORADO OR WASHINGTON 25, D.C.
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

PANTHER HILL, N. MEX.
N3330-W10430/7.5
1962
AMS 5051 II SE-SERIES V881

PROPOSED DISCHARGE POINT

OIL CONSERVATION DIVISION
RECEIVED
'90 AUG 20 PM 12 16

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

December 8, 1989

CERTIFIED MAIL
RETURN RECEIPT NO. P-106-675-197

Mr. William G. Janacek, Director
Environmental Affairs
ENRON GAS PIPELINE OPERATING CO.
P. O. Box 1188
Houston, Texas 77251-1188

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

Dear Mr. Janacek:

Under the provisions of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for your existing Roswell Compressor Station located in Section 28, Township 9 South, Range 24 East, (NMPM), Chaves County, New Mexico.

This notification of discharge plan requirement is pursuant to Sections 3-104 and 3-106 of the WQCC Regulations. The discharge plan, defined in Section 1.101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in buried underground tanks and/or piping), and closure plans for any ponds whose use will be discontinued.

A copy of the regulations is enclosed for your convenience. Also enclosed is a copy of an OCD guide to the preparation of discharge plans for gas processing plants. The guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Please include these items in your renewal application. Three copies of your discharge plan should be submitted for review purposes.

Section 3-106.A. of the regulations requires a submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Section 3-106.A also allows the discharge to continue without an approved discharge plan until 240 days after written notification by the Director of the OCD that a discharge plan is required. An extension of this time may be sought and approved for good cause.

If there are any questions on this matter, please feel free to call David Boyer at 827-5812, or Roger Anderson at 827-5884 as they have the assigned responsibility for review of all discharge plans.

Sincerely,

William J. LeMay
Director

WJL/RCA/sl

cc: OCD Artesia Office