



October 31, 2008

Mr. Carl Chavez  
Oil Conservation Division  
Environmental Bureau  
1220 S. St. Francis Dr.  
Santa Fe, NM 87505

Ms. Hope Monzeglio  
Environmental Specialist  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, BLDG 1  
Santa Fe NM 87505

Re: Engineering and Design of the Sanitary Wastewater Lift Station GW-032

Dear Mr. Chavez and Ms. Monzeglio:

Enclosed are various documents for your consideration that describe our proposed alternative to our previous plan for the Western Refining, Gallup Refinery, Sanitary Wastewater Lift Station. This submission is based on our preliminary telephone discussions with you, Carl, on Thursday, October 24, 2008. Our alternative plan we believe will be more effective, with lower operational requirements, and less system complexity, and meet the requirements in the OCD letter dated March 12, 2008.

Earlier, we had submitted various drawings to meet the requirement of sending engineering and design details to the agencies by June 2008, and these drawings and our plan had been approved by the OCD/NMEMNRD. Through this submittal we are sending you detailed drawings of important features of our proposed alternative and various other documents (maps, satellite photographs, drawings, block-flow diagrams, etc.) that will help you understand our reasoning and enable you to provide us with an evaluation of the alternative approach. At this time, the detailed drawings for our entire alternative plan are under preparation, and will be completed based on your approval of our proposed alternative.

The plan submitted earlier involved the construction of tanks with a capacity of 48-hours flow holding capacity, to account for the circumstance of a rupture or leak in the pipeline between the Pilot Travel Center and our wastewater treatment system. We are now proposing the construction of a second back-up pipeline, along with the new pipeline and new lift station to serve as an alternative to holding tanks in case the primary pipeline

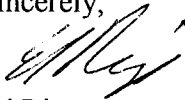
suffers a break. A second back-up line has the advantage that a rupture that lasts longer than 48 hours to repair could be dealt with more easily by using the secondary back-up line. Also, we will connect the two pipelines at various junctions (along with several clean-out locations) to account for any eventuality that both pipelines suffer a break (or leak for whatever reason) at the same time. We will thus be able to use sections of each pipeline in the extreme unlikely eventuality that both lines ever need repair simultaneously. We will also hydro-test the lines prior to commissioning, have a regular inspection and maintenance schedule to avoid any such possibility, and test the lines on a five year schedule.

We do understand the OCD and the NMED are concerned about the possibility that the Pilot Travel Center might send oil along with its sanitary wastewaters to the Western Refining new Wastewater Treatment System. The Pilot Travel Center does operate its own oil-water separator for all water generated from its truck and automobile service areas (this stream is kept separate from sanitary wastewater), and the water from the oil-water separator goes to the Pilot Travel Center's on-site evaporation lagoon (see satellite photograph and maps). Sludge from this oil-water separator is pumped out on a regular basis and is shipped off-site. The kitchen wastewater is also segregated and goes through grease traps before entering the sanitary wastewater stream. The Pilot Travel Center, therefore, will only send sanitary wastewater (and kitchen wastewater without oil and grease) to our wastewater treatment system, as the various streams within the Travel Center are physically segregated and treated differently.

The new alternative we are proposing has an additional great benefit - we are now proposing screens that will screen out < 2 mm solids, a scale smaller than our original plan. This finer scale is needed for the effective operation of our proposed new wastewater treatment system that deals with process wastewater along with the sanitary wastewater from the Pilot Travel Center.

Please contact me at (505) 722-0217 if you have any comments or questions regarding this submission.

Sincerely,

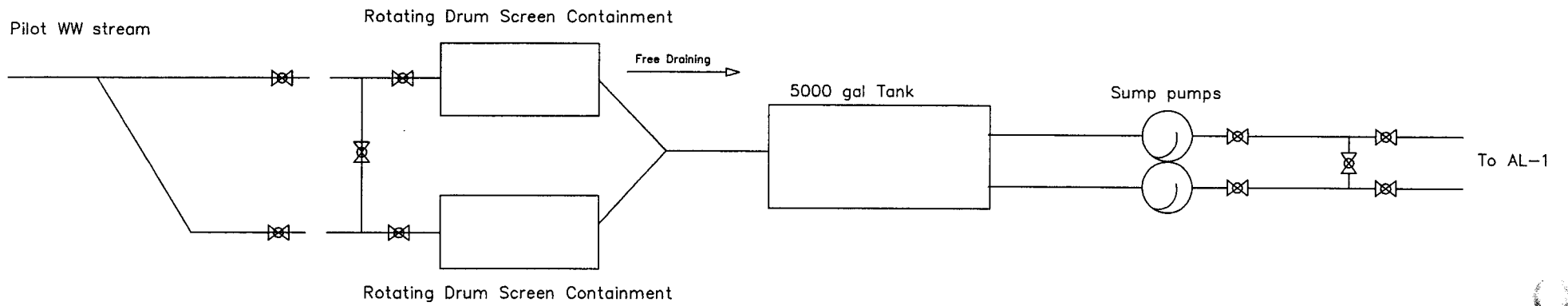


Ed Riege  
Environmental Superintendent

/Attachments

cc: Mark Turri  
Don Riley  
Jim Hallock  
Gaurav Rajen  
Western Refining

# Pilot Lift Station Basic Drawing



## ATTACHMENTS

- Pilot Lift Station Basic Drawing rev 1
- Pilot Travel Center Site Plan rev 1
- Pilot Travel Center Land Title Survey
- Figure 1 – Pilot Travel Center Satellite photograph
- Figure 2 – Pilot Travel Center Satellite photograph
- Z-02-158 Refinery elevation & Contours rev 1 (indicates new waste water pipe routing)
- D78534 Lakeside RAPTOR Rotating Drum Screen Model 24RDS-0.08-102
- D-68979 Lakeside RAPTOR Wedge Section Installation Model 24WS-0.04-89
- Lakeside Raptor Rotating Drum Screen bulletin #2316
- Lakeside Raptor Rotating Drum Screen Plant Performance Report #169

**TO VIEW THE MAP AND/OR  
MAPS WITH THIS DOCUMENT,  
PLEASE CALL THE  
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AT 505-476-6000 TO MAKE AN  
APPOINTMENT**