



GALLUP

Certified Mail #7014 1820 0001 7489 1607

December 10, 2015

Mr. John E. Kieling, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, New Mexico 87505-6303

RE: RESPONSE TO REQUIREMENT TO REMOVE SEPARATE PHASE
HYDROCARBONS AND GROUNDWATER MONITORING WELL GWM-1
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211

Dear Mr. Kieling:

Pursuant to your letter of October 28, 2015, please find the requested chromatogram for sample GWM-1, which was collected on September 18, 2015. Upon review of the sample results, the chromatogram, and other available information referenced by the New Mexico Environment Department (NMED), Western Refining Southwest, Inc. ("Western") is in agreement with NMED that the source of the hydrocarbon observed in GWM-1 is the adjacent Aeration Lagoon.

Western has measured fluid levels in GWM-1 and purged the well since August 2015 to evaluate the presence of separate phase hydrocarbons (SPH). The results are presented in Table 1. Based on this information, there appears to be very little SPH present near GWM-1.

If there are any questions regarding the enclosed information, please contact Mr. Ed Riege at (505) 722-0217. Please note that, in submitting the preceding response and enclosures, Western makes no admissions and reserves all applicable rights and defenses.

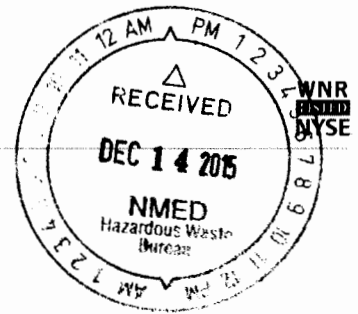
Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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 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.

Sincerely,

William Carl McClain, Jr.
Vice President and Refinery Manager
Western Refining Southwest, Inc. – Gallup Refinery

ENTRAPPED



cc D. Cobrain NMED HWB without enclosure
N. Dhawan, NMED HWB without enclosure
K. Van Horn, NMED HWB without enclosure
C. Chavez, OCD
L. King, EPA without enclosure
A. Allen, Western El Paso

Table 1
GWM-1 Fluid Level Measurements
Western Refining Southwest, Inc. - Gallup Refinery

Well Id	Date	Depth to Water (ft)	Depth to Product (ft)	Measured Product Thickness (ft)	Volume of Product (gallons)	Volume of Water (Gallons)	Notes
GWM-1	8/11/2015	NR	21.44	NR			Initial measurement made without oil/water interface probe
GWM-1	9/18/2015	21.45	21	0.45			
GWM-1	10/29/2015	21.47	21.13	0.34			
GWM-1	11/10/2015	21.55	21.1	0.45	0.25	3.75	
GWM-1	11/24/2015	21.3	NPP	0	0	2.5	sheen observed
GWM-1	12/4/2015	21.46	NPP	0	0	2.75	sheen observed
GWM-1	12/10/2015	23	NPP	0	0	2	sheen observed

NR - not recorded

NPP - No product present

GWM-1 DRO/MRO Chro

Instrument: Dante (Offline)
Sample ID: 1509910-001A

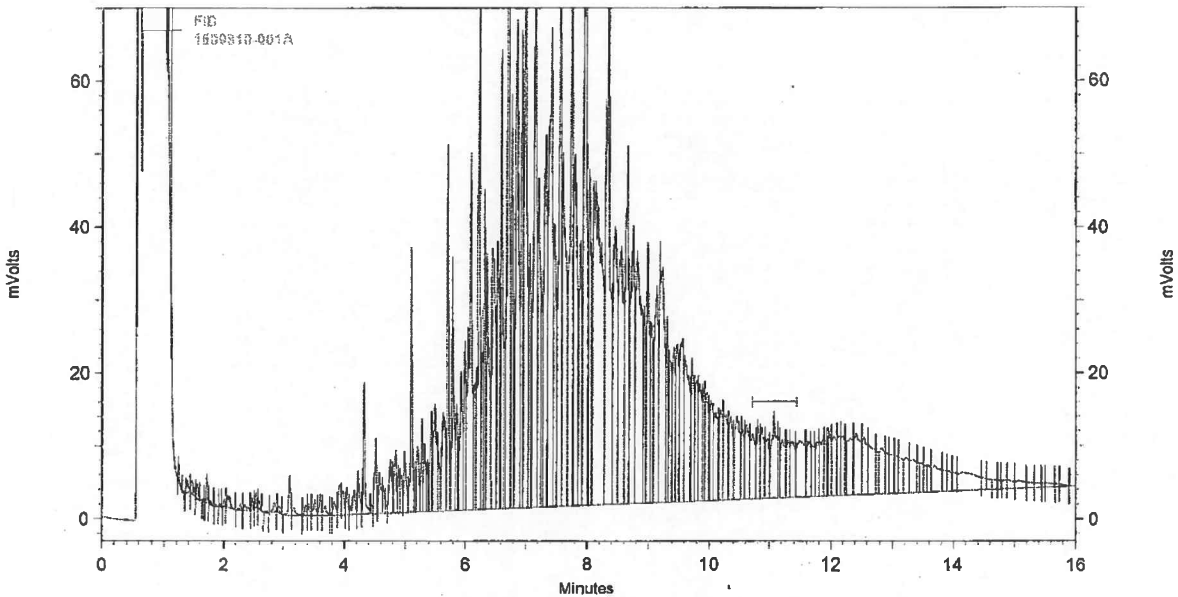
Vial #: 8
Data Description: PRODUCT X20

User: System

Method: H:\EZsemi\8015dro\Data 2015\Dante\Method\072015.met

File: H:\EZsemi\8015dro\Data 2015\Dante\Data\092115\1509910-001A 09-21-15 1-57-50 PM.dat

Acquired: 9/21/2015 2:03:14 PM



FID Results			
Name	Retention Time	Area	ug/ml
DNOP	11.077	65708	5.801
DRO		8751012	574.401
MRO		1188074	151.526

Analyst RSJ

Reviewed By [Signature]

$$(574.401 \times 0.00591) \times 20$$

67.9

DNOP not recovered
due to dilution