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June 29, 2017

JUL 5 2017

John Kieling, Bureau Chief
New Mexico Environmental Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

NMED
Hazardous Waste Bureau

**Re: 2017 FINANCIAL ASSURANCE FOR WESTERN REFINING
SOUTHWEST INC., GALLUP AND BLOOMFIELD REFINERIES
EPA ID# NMD000333211
EPA ID# NMD089416416
HWB-WRG-MISC
HWB-WRB-MISC**

Dear Mr. Kieling:

Western Refining Southwest, Inc. has prepared the following response to your comment (letter dated June 21, 2017) concerning Financial Assurance for Western Refining Southwest, Inc. Gallup and Bloomfield Refineries.

Comment 1

Western did not provide an explanation for Comment 1 from NMED's November 18, 2016 letter as required. Cost estimates from 2015 and previous years before have always provided an estimate for post-closure and closure. However, the 2016 and 2017 cost estimate submittals for Bloomfield have provided a cost estimate for closure only. Western must provide an explanation for adjusting Bloomfield's cost estimate from closure and post-closure costs to submitting a cost estimate for closure only.

Response 1

There is no post-closure activity at the Bloomfield Terminal because none of the RCRA Units or AOCs have been closed. During preparation of the 2016 Financial Assurance, it was discovered that the estimated cost to implement the Bloomfield Aeration Basin Closure Plan was tabulated as a post-closure activity in previous financial assurance submittals. The 2016 and 2017 financial assurance submittals were adjusted to reflect all Bloomfield remediation costs as closure costs.

If you have any questions or would like to discuss this response, please contact Allen Hains at (915) 534-1483.

Sincerely,

WESTERN REFINING SOUTHWEST, INC.

A handwritten signature in cursive script that reads 'Allen S. Hains for'.

By: LESLIE ANN ALLEN
Vice-President, EHS

cc: D. Cobrain, NMED HWB
K. Van Horn, NMED HWB
L. Tsinnajinnie, NMED HWB
S. Singleton, NMED HWB
L. King, EPA Region 6 (6PD-N)
D. Statile, Western Refining, Gallup, NM
R. Schmaltz, Western Refining, Bloomfield, NM
A. Hains, Western Refining, El Paso, Texas