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Sent via Electronic Correspondence

February 20, 2018

New Mexico Oil Conservation Division  
Energy Minerals and Natural Resources Department  
Attn: Carl Chavez  
1220 South St Francis Drive  
Santa Fe, New Mexico 87505  
Ph. (505) 476-3490  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)

**Re: Voluntary Disclosure of Shipments of Listed Waste to Gandy Marley, Inc.**

Dear Mr. Chavez:

We are writing regarding historical hazardous waste management at Western Refining Southwest, Inc.'s (Western) Gallup Refinery. Western is an indirect subsidiary of Andeavor (formerly known as Tesoro Corporation) which merged with Western Refining, Inc. in June 2017. As part of its assessment of Western's environmental compliance, Andeavor conducted a review of waste shipment records for Western's Gallup Refinery. We are providing this voluntary disclosure in the interest of transparency.

For a period of time between August 26, 2013 and February 18, 2014, approximately thirty-nine (39) roll-off bins containing "filter cake" were incorrectly profiled and shipped as non-hazardous waste to Gandy Marley, Inc.'s disposal site located in Chavez County, New Mexico. Each roll-off bin held approximately 18 cubic yards of material. The filter cake was generated at the Gallup Refinery and originated from the dissolved gas floatation (DGF) portion of the wastewater treatment system. Based on this information, the filter cake appears to have been a RCRA defined hazardous waste, specifically a F038-listed waste (petroleum refinery secondary (emulsified) oil/water/solids separation sludge).

The waste was disposed of at Gandy Marley, Inc.'s permitted landfill that was authorized to accept drilling mud, petroleum hydrocarbon contaminated soils, and oil field sludge. Because the characteristics of the filter cake were similar to the oil-field wastes Gandy Marley was authorized to accept, disposal of the filter cake at Gandy Marley's landfill does not appear to have posed any greater environmental risks for the landfill at that time.

The Gallup Refinery currently profiles filter cake as an oil-bearing hazardous secondary material and ships it to a third party refinery for oil recovery, thus excluding it from classification as a solid waste.

If you have any questions about this notification, I can be reached at [theresa.r.peterson@andeavor.com](mailto:theresa.r.peterson@andeavor.com) or (801) 606-2208.

Sincerely,

A handwritten signature in black ink that reads "Teri Peterson".

Teri Peterson  
Lead Environmental Waste Specialist  
Andeavor

Electronic cc: Gandy Marley, Inc.  
K. VanHorn, NMED  
D. Pruner, Gallup Refinery  
J. O'Brien, Gallup Refinery  
T. Piznar, Andeavor  
L. Gould, Andeavor