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July 30, 2018

Mr. John E. Kieling, Chief
New Mexico Environmental Department
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, NM 87505-6303

RE: HYDROCARBON SEEP INTERIM MEASURES 2018 2nd QUARTER STATUS REPORT
WESTERN REFINING SOUTHWEST INC, GALLUP REFINERY
EPA ID# NMD000333211
HWB-WRG-15-006

Dear Mr. Keiling:

The attached first quarter report was prepared pursuant to Comment 22 in your letter dated April 26, 2016 on the Interim Measures Report Hydrocarbon Seep Area. Comment 22 requests a quarterly status report.

If you have any questions regarding the information being provided, please do not hesitate to contact Jessica O'Brien at (505) 722-0287.

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,

A handwritten signature in black ink, appearing to read "Daniel J. Statile".

Daniel J. Statile
Vice President Refining
Western Refining Southwest, Inc. – Gallup Refinery

Enclosure

cc: K. VanHorn, NMED (via e-mail)
C. Chavez, OCD (via e-mail)
D. Pruner, Gallup Refinery (via e-mail)
A. Hains, Andeavor (via e-mail)

**QUARTERLY STATUS REPORT
HYDROCARBON SEEP INTERIM MEASURES
WESTERN REFINING SOUTHWEST, INC – GALLUP REFINERY
Second Quarter 2018**

Activities conducted during second quarter 2018

- Source Control – Western continued to remove separate-phase hydrocarbon (SPH) and groundwater from the standpipe sumps (S1 - S6). Approximately 9 gallons of SPH and 28,491 gallons of groundwater were recovered during the second quarter, which represents a significant reduction in SPH from 153 gallons recovered during the last quarter (1st Qtr 2018). The percent of SPH recovered of the total volume was approximately, 0.03% which is significantly less than the previous quarter of 0.16%. This represents a fairly continuous reduction in the amount of SPH recovered since 2016. Recovery was discontinued at the retention ditch, which was previously excavated north of the standpipes (S1-S6), as product was no longer observed to be entering the retention ditch.

The reduction in the volumes of SPH recovered in the second quarter of 2018 as compared to the previous quarterly volumes is not attributed to any changes in the methods used to estimate the recovery volumes.

- Camera Surveys – Western is evaluating the reliance upon dye tracer tests instead of more camera surveys, as earlier camera surveys were not as useful as tracer tests in locating leaks from subsurface pipelines.
- Dye Tracer Tests – Western previously conducted dye tracer tests at several locations near the Truck Loading Rack. The earlier test methods and results were reviewed to determine if it is possible to refine the earlier tests by locating additional points where a tracer may be introduced to the wastewater pipelines/sump. New dye tracer tests were conducted related to an assessment of the sanitary lagoon, which is located west of the hydrocarbon seep area, and this information is presented under separate cover, as it was not focused on the hydrocarbon seeps.

Activities planned for third quarter 2018

- Source Control – Western will continue current recovery operations at the standpipe sumps and the retention ditch, if hydrocarbons are present, using a vacuum truck to pump SPH and groundwater from each of the sumps and the downstream retention ditch.

Western Refining Southwest, Inc. - Gallup Refinery

Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)				
9/3/2013*	682	3818	4500				
9/3/2013*	367	4133	4500				
9/4/2013	62	3938	4000				
9/6/2013	62	3938	4000				
9/9/2013	30	4470	4500				
9/11/2013	30	4470	4500				
9/13/2013	62	3938	4000				
9/16/2013	135	5140	5275				
9/18/2013	125	4111	4236				
9/24/2013	58	4742	4800				
9/26/2013	16	4220	4236				
10/2/2013	29	4918	4947				
10/8/2013	30	4569	4599				
10/18/2013	109	5059	5168				
10/28/2013	199	5379	5578				
10/29/2013	63	4049	4112				
11/12/2013	205	5275	5480				
11/14/2013	78	5168	5246				
11/18/2013	60	4539	4599				
11/26/2013	80	5168	5248				
12/3/2013	54	5169	5223				
12/6/2013	57	4890	4947				
12/12/2013	54	5169	5223				
12/17/2013	58	4775	4833				
				2013 Totals	hydrocarbon recovered	water pumped	total fluid pumped
12/24/2013	57	4890	4947		2,705	111,045	113,750
1/2/2014	88	4687	4775				
1/6/2014	56	4947	5003				
1/7/2014	32	3829	3861				
1/9/2014	32	3448	3480				
1/13/2014	29	4688	4717				
1/16/2014	29	4688	4717				
1/22/2014	29	4918	4947				
1/29/2014	30	4449	4479				
1/31/2014	61	4236	4297				
2/4/2014	61	4236	4297				
2/11/2014	60	4539	4599				
2/18/2014	57	4890	4947				
2/25/2014	57	4890	4947				

Western Refining Southwest, Inc. - Gallup Refinery

Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)
2/28/2014	63	3924	3987
3/4/2014	31	4327	4358
3/7/2014	29	4804	4833
3/12/2014	29	4804	4833
3/14/2014	30	4449	4479
3/17/2014	32	3829	3861
3/19/2014	32	3448	3480
3/24/2014	32	3703	3735
3/28/2014	32	3703	3735
4/1/2014	32	3703	3735
4/3/2014	32	3320	3352
4/7/2014	15	4220	4235
4/15/2014	30	4205	4235
4/23/2014	31	4327	4358
5/1/2014	31	4327	4358
5/7/2014	31	4081	4112
5/14/2014	30	4205	4235
5/22/2014	31	4081	4112
5/29/2014	31	3994	4025
6/6/2014	31	4081	4112
6/13/2014	32	3829	3861
6/20/2014	32	3955	3987
7/3/2014	31	4081	4112
7/10/2014	30	4205	4235
7/18/2014	30	4205	4235
7/28/2014	30	4205	4235
8/4/2014	30	4205	4235
8/14/2014	32	3955	3987
8/20/2014	31	4081	4112
8/29/2014	32	3955	3987
9/4/2014	32	3703	3735
9/11/2014	32	3576	3608
9/18/2014	32	3320	3352
9/26/2014	32	3448	3480
9/30/2014	32	3576	3608
10/7/2014	32	3320	3352
10/14/2014	32	3320	3352
10/21/2014	32	3955	3987
10/30/2014	32	3955	3987
11/7/2014	32	3320	3352

Western Refining Southwest, Inc. - Gallup Refinery

Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)				
11/12/2014	32	3320	3352				
11/18/2014	32	3064	3096				
12/4/2014	32	3829	3861				
12/9/2014	32	3955	3987				
12/15/2014	31	4081	4112				
12/24/2014	31	4081	4112				
12/30/2014	32	3703	3735	2014 Totals	hydrocarbon recovered	water pumped	total fluid pumped
1/8/2015	31	4081	4112				
1/21/2015	31	4327	4358				
1/29/2015	32	3448	3480				
2/6/2015	32	3448	3480				
2/11/2015	32	3320	3352				
3/5/2015	29	4688	4717				
3/12/2015	31	4081	4112				
3/16/2015	31	4081	4112				
3/25/2015	32	3703	3735				
3/31/2015	32	3955	3987				
4/13/2015	32	3829	3861				
4/20/2015	32	3703	3735				
4/27/2015	16	4096	4112				
4/30/2015	16	4096	4112				
5/11/2015	16	4220	4236				
5/29/2015	16	3971	3987				
6/8/2015	16	4096	4112				
6/12/2015	16	4096	4112				
6/16/2015	16	4220	4236				
6/24/2015	15	4583	4599				
7/2/2015	16	4096	4112				
7/8/2015	16	3971	3987				
7/15/2015	15	4343	4358				
7/22/2015	16	4220	4236				
7/30/2015	16	3845	3861				
8/6/2015	16	4220	4236				
8/12/2015	16	3971	3987				
8/17/2015	16	4220	4236				
8/21/2015	16	3845	3861				
8/26/2015	16	4220	4236				
9/2/2015	15	4464	4479				

Western Refining Southwest, Inc. - Gallup Refinery

Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)				
9/11/2015	14	5154	5168				
9/25/2015	15	4464	4479				
10/2/2015	15	4583	4599				
10/8/2015	16	4220	4236				
10/23/2015	16	4817	4833				
10/29/2015	16	4220	4236				
11/11/2015	14	4933	4947				
11/20/2015	24	5554	5578				
11/30/2015	43	4790	4833				
12/10/2015	56	5323	5379				
12/17/2015	56	4891	4947				
12/24/2015	54	5114	5168				
12/31/2015	54	5114	5168	2015 Totals	hydrocarbon recovered	water pumped	total fluid pumped
					1,071	188,634	189,707
1/7/2016	56	5323	5379				
1/19/2016	51	5429	5480				
1/26/2016	56	5003	5059				
2/11/2016	54	5221	5275				
2/17/2016	56	4891	4947				
2/25/2016	56	5323	5379				
3/4/2016	47	5625	5672				
3/11/2016	49	5529	5578				
3/17/2016	59	4658	4717				
3/24/2016	45	5717	5762				
3/31/2016	49	5529	5578				
4/6/2016	38	5966	6004				
4/15/2016	40	5888	5928				
4/20/2016	56	5323	5379				
4/27/2016	43	5804	5847				
5/5/2016	47	5625	5672				
5/9/2016	60	4419	4479				
5/10/2016	45	5717	5762				
5/17/2016	40	5888	5928				
5/19/2016	51	5429	5480				
5/24/2016	38	5966	6004				
5/25/2016	49	5529	5578				
5/27/2016	43	5804	5847				
6/1/2016	45	5717	5762				
6/3/2016	51	5429	5480				

Western Refining Southwest, Inc. - Gallup Refinery

Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)
6/7/2016	35	6039	6074
6/9/2016	47	5625	5672
6/13/2016	40	5888	5928
6/16/2016	38	5966	6004
6/20/2016	40	5888	5928
6/23/2016	49	5529	5578
6/27/2016	47	5625	5672
6/30/2016	60	4419	4479
7/6/2016	232	4768	5000
7/8/2016	109	3891	4000
7/11/2016	232	4768	5000
7/19/2016	300	5300	5600
7/21/2016	109	3891	4000
7/25/2016	232	4768	5000
7/28/2016	109	3891	4000
8/2/2016	232	4768	5000
8/9/2016	300	5300	5600
8/15/2016	232	4768	5000
8/18/2016	109	3891	4000
8/23/2016	232	4768	5000
8/25/2016	109	3891	4000
8/29/2016	232	4768	5000
9/1/2016	109	3891	4000
9/7/2016	232	4768	5000
9/9/2016	109	4187	4296
9/12/2016	109	3891	4000
9/15/2016	109	3891	4000
9/19/2016	232	4768	5000
9/27/2016	300	5300	5600
9/29/2016	109	3891	4000
10/5/2016	280	5180	5460
10/7/2016	280	5180	5460
10/10/2016	280	5180	5460
10/20/2016	109	3891	4000
10/26/2016	50	2450	2500
10/28/2016	109	3891	4000
11/1/2016	109	3891	4000
11/3/2016	109	3891	4000
11/8/2016	109	3891	4000
11/10/2016	109	3891	4000

Western Refining Southwest, Inc. - Gallup Refinery

Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)				
11/14/2016	109	3891	4000				
11/23/2016	109	3891	4000				
12/6/2016	109	3891	4000				
12/8/2016	109	3891	4000				
12/13/2016	303	4697	5000				
12/15/2016	109	3891	4000				
12/20/2016	109	3891	4000				
12/27/2016	400	4600	5000				
12/29/2016	109	3891	4000	2016 Totals	hydrocarbon recovered	water pumped	total fluid pumped
					8,668	357,619	366,287
1/10/2017	109	3891	4000				
1/20/2017	167	4333	4500				
2/2/2017	109	3891	4000				
2/6/2017	231	4769	5000				
2/17/2017	231	4769	5000				
2/20/2017	109	3891	4000				
3/1/2017	109	4891	5000				
3/6/2017	167	4833	5000				
3/9/2017	109	3891	4000				
3/14/2017	231	4769	5000				
5/8/2017	303	4697	5000				
5/12/2017	167	3833	4000				
5/15/2017	167	3833	4000				
5/16/2017	10	5590	5600				
5/18/2017	10	3090	3100				
5/23/2017	40	5560	5600				
5/24/2017	232	4768	5000				
5/30/2017	20	5980	6000				
6/1/2017	10	2990	3000				
6/6/2017	100	7900	8000				
6/8/2017	10	5990	6000				
6/13/2017	10	5990	6000				
6/15/2017	50	5950	6000				
6/20/2017	10	5990	6000				
6/22/2017	10	5990	6000				
6/27/2017	20	5980	6000				

Western Refining Southwest, Inc. - Gallup Refinery
Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)
6/29/2017	10	5990	6000
7/5/2017	10	2990	3000
7/7/2017	50	8950	9000
7/11/2017	10	5990	6000
7/14/2017	10	5990	6000
7/17/2017	10	2990	3000
7/18/2017	20	2980	3000
7/20/2017	50	8950	9000
7/26/2017	75	5925	6000
7/27/2017	50	2950	3000
8/2/2017	75	5425	5500
8/4/2017	10	3490	3500
8/8/2017	25	5475	5500
8/10/2017	20	3480	3500
8/16/2017	15	4485	4500
8/21/2017	50	7950	8000
8/25/2017	25	2975	3000
8/29/2017	50	5950	6000
8/31/2017	20	2980	3000
9/6/2017	15	5985	6000
9/8/2017	15	2985	3000
9/12/2017	25	5975	6000
9/14/2017	75	3925	4000
9/19/2017	49	2951	3000
9/26/2017	49	3751	3800
9/28/2017	25	3775	3800
10/4/2017	50	3450	3500
10/6/2017	45	3455	3500
10/10/2017	25	5975	6000
10/12/2017	50	2950	3000
10/17/2017	50	5450	5500
10/19/2017	9	2841	2850
10/24/2017	19	5981	6000
10/26/2017	49	2451	2500
11/1/2017	49	5951	6000
11/7/2017	50	2950	3000
11/9/2017	24	4976	5000
11/14/2017	9	5991	6000

Western Refining Southwest, Inc. - Gallup Refinery

Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)				
11/15/2017	9	2991	3000				
11/21/2017	9	5991	6000				
11/22/2017	9	2991	3000				
11/28/2017	9	5991	6000				
11/30/2017	9	2991	3000				
12/4/2017	25	7575	7600				
12/7/2017	25	5975	6000				
12/12/2017	19	7581	7600				
12/14/2017	9	2991	3000				
12/19/2017	9	2991	3000				
12/21/2017	49	5951	6000				
12/27/2017	49	5951	6000	2017 Totals	hydrocarbon recovered	water pumped	total fluid pumped
					4,238	365,712	369,950
1/2/2018	9	7591	7600				
1/4/2018	9	3791	3800				
1/9/2018	9	3791	3800				
1/11/2018	9	7591	7600				
1/15/2018	19	3781	3800				
1/17/2018	19	7581	7600				
1/23/2018	9	3791	3800				
1/31/2018	9	2991	3000				
2/2/2018	9	2991	3000				
2/9/2018	9	5991	6000				
2/13/2018	9	3791	3800				
2/15/2018	9	7591	7600				
2/21/2018	9	5991	6000				
2/27/2018	0	3800	3800				
3/1/2018	0	3000	3000				
3/6/2018	0	3000	3000				
3/8/2018	4	3796	3800				
3/13/2018	4	2996	3000				
3/16/2018	4	2996	3000				
3/20/2018	4	2996	3000		hydrocarbon	water	total fluid
3/22/2018	0	3000	3000	1st Qtr 2018	153	92,847	93,000
4/3/2018	3	2997	3000				

Western Refining Southwest, Inc. - Gallup Refinery

Stand Pipes Recovery Records

DATE	hydrocarbon recovered (gallons)	water pumped (gallons)	total fluid pumped (gallons)				
6/6/2018	3	3097	3100				
6/8/2018	3	3097	3100				
6/12/2018	0	3800	3800				
6/14/2018	0	3000	3000				
6/20/2018	0	3500	3500				
6/21/2018	0	3000	3000				
6/26/2018	0	3000	3000				
6/28/2018	0	3000	3000	2nd Qtr 2018	hydrocarbon	water	total fluid
					9	28,491	28,500
Project Totals	19,009	1,391,420	1,410,431				

* two loads were removed on this date

** based on estimates from measurements taken on 10/13/16 and 10/18/16

**Western Refining Southwest, Inc. - Gallup Refinery
Retention Ditch Recovery Records**

DATE	LOADS	water/oil mixture (gallons)	oil (gallons)
4/1/2016	1	5460	NR
4/27/2016	1	5460	NR
4/28/2016	1	5460	NR
5/5/2016	1	5460	NR
5/9/2016	0.75	4200	NR
5/13/2016	1	5460	NR
5/24/2016	1	5460	NR
5/26/2016	0.5	2730	NR
5/27/2016	1	5460	NR
6/1/2016	1	5460	NR
6/2/2016	1	5460	NR
6/6/2016	1	5460	NR
6/8/2016	1	5460	NR
6/9/2016	0.5	2730	NR
6/14/2016	1	5460	NR
6/16/2016	1	5460	NR
6/23/2016	1	5460	NR
6/29/2016	0.5	2730	NR
7/6/2016	1	5460	NR
7/8/2016	1	5460	NR
7/13/2016	1	5460	NR
7/21/2016	1	5460	NR
7/27/2016	1	5460	NR
8/3/2016	1	5460	NR
8/9/2016	2	10920	NR
8/10/2016	0.5	2730	NR
8/16/2016	1	5460	NR
8/17/2016	1	5460	NR
8/18/2016	0.5	2730	NR
8/23/2016	2	10920	NR
8/24/2016	1	5460	NR
8/26/2016	1	5460	NR
8/30/2016	1	5460	NR
9/1/2016	2	10920	NR
9/8/2016	2	10920	NR
9/14/2016	2	10920	NR
10/6/2016	1	5460	NR
10/7/2016	1	5460	NR
10/10/2016	2	10920	NR
10/20/2016	1	5460	NR
10/24/2016	1	5460	NR

**Western Refining Southwest, Inc. - Gallup Refinery
Retention Ditch Recovery Records**

DATE	LOADS	water/oil mixture (gallons)	oil (gallons)			
10/26/2016	2	10920	NR			
10/27/2016	1	5460	NR			
10/31/2016	2	10920	NR			
11/8/2016	2	10920	NR			
11/10/2016	3	16380	NR			
11/11/2016	0.77	4200	NR			
11/15/2016	0.5	2730	NR			
11/16/2016	1	5460	NR			
12/6/2016	1	5460	NR			
12/8/2016	1	5460	NR			
12/14/2016	1	5460	NR			
12/15/2016	3	15120	NR	2016 Totals	LOADS	water/oil mixture
					62.52	340,200
2/21/2017	NR	5000	NR			
3/8/2017	NR	10000	NR			
3/10/2017	NR	4000	NR			
3/14/2017	NR	10000	NR			
3/15/2017	NR	4000	NR			
3/16/2017	NR	1250	NR			
3/17/2017	NR	5000	NR			
5/16/2017	1	2000	20			
5/17/2017	3	15000	NR			
5/22/2017	1	5000	NR			
5/23/2017	1	2800	20			
5/24/2017	1	5000	NR			
5/30/2017	1	3500	10			
6/6/2017	1	3100	20			
6/8/2017	2	5800	20			
6/13/2017	1	2900	30			
6/15/2017	1	3000	10			
6/20/2017	1	2000	10			
6/22/2017	1	3000	20			
6/27/2017	2	5500	40			
6/29/2017	1	2500	10			
7/5/2017	2	5600	10			
7/7/2017	1	3000	20			
7/11/2017	1	3000	10			
7/14/2017	1	3000	10			
7/18/2017	1	2500	10			
7/20/2017	1	3000	10			

**Western Refining Southwest, Inc. - Gallup Refinery
Retention Ditch Recovery Records**

DATE	LOADS	water/oil mixture (gallons)	oil (gallons)				
7/27/2017	2	4500	10				
8/3/2017	2	5000	20				
8/4/2017	1	3000	20				
8/9/2017	1	3000	25				
8/16/2017	1	2000	10				
8/25/2017	1	1500	50				
8/31/2017	1	2000	40				
9/7/2017	2	5200	80				
9/15/2017	2	5500	100				
9/20/2017	1	3800	100				
9/26/2017	1	3800	10				
10/4/2017	1	3500	100				
10/12/2017	1	2800	95				
10/19/2017	1	3000	100				
10/26/2017	1	2500	100				
11/1/2017	1	3000	100				
11/7/2017	1	3000	100				
11/15/2017	2	5500	100				
11/22/2017	1	2000	100				
11/28/2017	1	2000	50				
12/4/2017	1	1500	100				
12/14/2017	1	1500	50				
12/19/2017	1	2500	100				
12/27/2017	1	2000	50	2017 Totals	54	194,550	1,890
1/4/2018	1	2800	25				
1/9/2018	2	7500	9				
1/15/2018	1	2500	20				
1/23/2018	1	3800	9				
1/31/2018	1	2500	9				
2/2/2018	1	2500	9				
2/13/2018	1	2000	9				
2/21/2018	1	2080	20				
3/6/2018	1	1500	19				
3/13/2018	1	1500	9				
3/22/2018	1	1500	20	1st Qtr 2018	13	32,180	208
	0	0	0	2nd Qtr 2018	0	0	0
Project Totals	128.5	564,930	2,048				

Totals for oil only includes data since May 2017