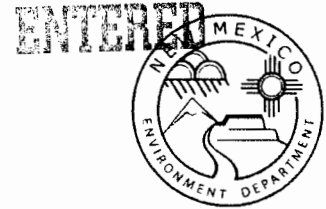




NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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HOWIE C. MORALES
Lt. Governor

JAMES C. KENNEY
Cabinet Secretary

JENNIFER J. PRUETT
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 5, 2019

John Moore
Environmental Superintendent
Western Refining, Southwest Inc., Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS
HYDROCARBON SEEP INTERIM MEASURES 2018 2ND QUARTER STATUS
REPORT
MARATHON PETROLEUM COMPANY LP, GALLUP REFINERY
(FORMERLY WESTERN REFINING SOUTHWEST INC.)
EPA ID # NMD000333211
HWB-WRG-18-006**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Hydrocarbon Seep Interim Measures 2018 2nd Quarter Status Report* (Response), dated January 31, 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc. (the Permittee). The Permittee must address the following comment.

The response to NMED *Approval with Modifications* Comment 2 states, “[a]lthough there has already been some soil removal in the area, MPC is not prepared to implement a remedy at the site until such time as the seeps have ceased to receive hydrocarbons. At that time, MPC will evaluate remedy options for the area and submit a plan to the NMED for review and approval. As indicated in Comment 4 below, the current plan is to leave the retention ditches open to collect free hydrocarbons. Until the hydrocarbons are no longer seeping into the soil, there would seem to be little purpose in developing a remediation plan. Once the discharge of hydrocarbons has ceased, a remediation plan can be submitted for review and approval.” The Permittee’s

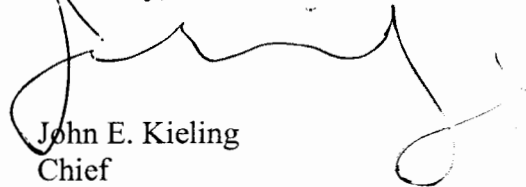
Mr. Moore
March 5, 2019
Page 2

response does not address the following issue. Photo No. 3 depicts hydrocarbons seeping from the ground surface and is labeled "location with concentrated discharge of hydrocarbons midway along retention ditch." NMED does not require a remediation plan to address hydrocarbons seeping from the ground.

However, the Permittee must implement an interim measure to address the issue of hydrocarbons sitting on the ground surface. When the area is dry and accessible, remove the hydrocarbon contaminated soils. Monitor the area weekly and note whether hydrocarbons persist in surfacing. If there are other areas where hydrocarbons are seeping at the ground surface, similar to the conditions shown in Photo No. 3, provide information regarding the locations and photographs showing the condition of the areas and remove hydrocarbons at the ground surface. Submit an update regarding this issue in the Hydrocarbon Seep Interim Measures 2019 1st Quarter Status Report by **April 30, 2019**.

If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: K. Van Horn, NMED HWB
D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
C. Chavez, OCD
L. King, EPA Region 6
B. Moore, WRG

File: Reading File and WRG 2019 File
HWB-WRG-18-006