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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 12, 2019

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

**RE: APPROVAL WITH MODIFICATIONS
EVAPORATION POND BERM TESTING
MARATHON PETROLEUM COMPANY LP, GALLUP REFINERY
(FORMERLY WESTERN REFINING SOUTHWEST INC.)
EPA ID # NMD000333211
HWB-WRG-19-004**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) is in receipt of the Marathon Petroleum Company LP dba Western Refining Southwest, Inc. Gallup Refinery (the Permittee) *Evaporation Pond Berm Testing* (Work Plan) dated February 8, 2019. NMED hereby issues this Approval with Modifications. The Permittee must provide a response letter that addresses the following comments.

Comment 1

Under the heading "Updated Numerical Slope Stability Analysis", page 1, the Permittee states that "[f]ield investigation activities will begin with installing 10 new piezometers that will be used to complete the updated numerical slope stability analysis." Provide the rationale for the locations selected for the permanent piezometers. The locations correspond to the previous locations of temporary piezometers at Pond 7, Pond 6 (West to East), and Pond 9A. In the report, discuss whether the piezometers are located along berms that have been repaired or upgraded. Additionally, piezometers are proposed for the Pond 7/8 west berm; NMED recommends

installing additional piezometers closer to Pond 8 due to concerns of pond water leaching into groundwater at the western end of the evaporation ponds.

Comment 2

Under the heading “Updated Numerical Slope Stability Analysis”, page 2, first paragraph, the Permittee states, “[p]revious slope stability analyses conducted at the evaporation pond berms were completed using data from temporary drive point piezometers that were abandoned during ongoing berm improvement activities. The ten new piezometers shown on Figure 1 will be installed as permanent structures with bentonite seals above the screen interval to prevent surface water intrusion and interference.” Provide the diameter of the piezometers.

Comment 3

Under the heading “Updated Numerical Slope Stability Analysis”, page 2, second paragraph, the Permittee states, “[r]epresentative soil samples will be collected during piezometer installation and submitted to Advanced Terra Testing laboratories in Lakewood, CO for geotechnical analysis including: Soil characterization; Wet and dry unit weights with moisture content; Atterberg limits; Sieve analysis; Effective stress parameters (c' and ϕ') from a consolidated-drained triaxial shear test.” Describe the method proposed to collect the soil samples and whether the samples will be disturbed or undisturbed.

Comment 4

Under the heading “Updated Numerical Slope Stability Analysis”, page 2, third paragraph, the Permittee states, “[t]o determine the phreatic surface level within the berms, water levels will be recorded from the new piezometers on a monthly basis until stable (about three months).” Describe how the water levels will be measured and recorded.

Comment 5

Ensure that the soil boring logs contain detailed enough descriptions of the soils encountered and note any discontinuities.

Comment 6

Under the heading “Updated Numerical Slope Stability Analysis”, page 2, the Permittee states, “[a]s requested by NMED, results of the slope stability analysis investigation described in this work plan will be submitted to NMED in an Updated Slope Stability Report.” The work conducted under this Work Plan must be submitted as a separate report.

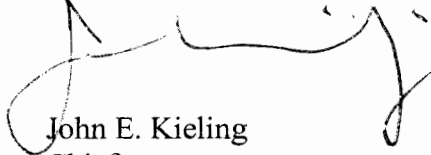
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The Permittee must submit a response letter that addresses all of NMED's comments by **April 30, 2019**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

If you have questions regarding this correspondence, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: K. Van Horn, NMED HWB
C. Chavez, EMNRD OCD
S. Holcomb, NMED SWQB
L. King, EPA

File: Reading File and WRG 2019 File
WRG-19-004