



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6313  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.env.nm.gov](http://www.env.nm.gov)

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

 **ENTERED**



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

August 23, 2019

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

**RE: APPROVAL  
HYDROCARBON SEEP INTERIM MEASURES 2019 SECOND QUARTER STATUS  
REPORT  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-19-014**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Hydrocarbon Seep Interim Measures 2019 Second Quarter Status Report* (Report), dated July 26, 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee).

In accordance with NMED's *Disapproval Interim Measures Report Hydrocarbon Seep Area*, dated April 26, 2016, the Permittee implemented source control measures by extracting groundwater and separate phase hydrocarbon (SPH) from the standpipe sumps and recovery trench during the second quarter of 2019.

The recovered water volume from the standpipe sumps during this quarter nearly doubled that of the previous quarter. However, the volume still appears to be within the normal range observed in recent years. Since the third quarter of 2018 the recovered SPH volume continued

to be recorded as “zero” from the standpipe sumps.

The recovered water volume from the retention ditch during this quarter was slightly less than that of the previous quarter and recorded as the lowest since the third quarter of 2018. The recovered SPH volume from the retention ditch during this quarter increased from 136 to 602.2 gallons. The recorded volume (602.2 gallons) is not considered to be unusual because the recovered volumes during the third and fourth quarters of 2018 were similarly recorded as 658 and 610 gallons, respectively. The volume of SPH recovery is relatively consistent.

The Permittee proposes to continue current recovery operations at the standpipe sumps and the retention ditch as a source control measure during the third quarter of 2019. NMED concurs with the continuation of current recovery operations.

NMED's *Approval Hydrocarbon Seep Interim Measures 2019 1st Quarter Status Report*, dated May 29, 2019 stated, “[t]he RO reject water must be sampled if it is directly discharged to Pond EP-9. Include the provision in the 2019 Facility-Wide Groundwater Monitoring Plan 2019 update, as necessary. Additionally, provide a map that presents locations of the pipeline that carries the reject water and point(s) where leaks along the pipeline were detected. Furthermore, include the information regarding (1) the depth of the pipeline, (2) the difference between RO reject water and boiler water which is described in the 2018 Facility-Wide Groundwater Monitoring Plan and identified as no longer in service, and (3) history of the discharge directly to Pond-9 in a response letter. The map and response letter must be submitted no later than **July 18, 2019.**” The Permittee states, “[f]urther information will be provided in a separate letter as requested in NMED’s letter of May 29, 2019.” The referenced letter was due on July 18, 2019; however, it was not received by NMED at the time this letter was sent out. The Permittee must submit the letter required by NMED’s May 29, 2019 letter no later than **August 30, 2019** or provide a letter requesting an extension of the submittal date in accordance with Permit Section I.J.12.

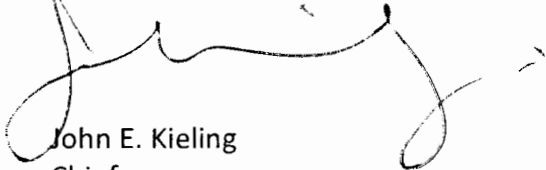
The Permittee has fulfilled its obligation to implement source control measures and submit a quarterly report to NMED. The Permittee must continue to implement source control measures at the site and submit quarterly status reports to NMED. The 2019 third quarter status report must be submitted no later than **October 31, 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.

Mr. Moore  
August 23, 2019  
Page 3

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

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and "K".

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 (6LCRRC)  
B. Moore, WRG

File: Reading File and WRG 2019 File  
HWB-19-014