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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

November 15, 2019

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

**RE: APPROVAL WITH MODIFICATIONS  
[REVISED] FACILITY WIDE GROUND WATER MONITORING WORK PLAN – UPDATES  
FOR 2019  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-19-012**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *[Revised] Facility Wide Ground Water Monitoring Work Plan – Updates for 2019* (Work Plan), dated September 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

**Comment 1**

The Permittee's response to NMED's Comment 4 states, "[d]ue to a leak in the pipeline that went to EP-2, the flow has been temporality diverted to EP-9." Comment 3 in NMED's *Response to Comments Approval - Hydrocarbon Seep Interim Measures 2019 Second Quarter Status Report*, dated September 20, 2019 states, "[c]larify whether the Permittee currently has an approval from New Mexico Department of Energy, Minerals, and Natural Resources (EMNRD) Oil Conservation Division (OCD) to use evaporation ponds (e.g., EP-9) for the discharge of the

RO reject water. Additionally, it is not clear whether EMNRD OCD has agreed to the direct discharge of the RO reject water to Pond STP-1 because [the] wastewater treatment process associated with Pond STP-1 does not reduce the concentrations of constituents (e.g., chloride and sulfate) in the RO reject water. Clarify whether the Permittee has an approval from EMNRD OCD to route the RO reject water to Pond STP-1." The Permittee was required to submit a response letter to address the comment no later than **November 1, 2019**. This comment serves as a reminder.

#### **Comment 2**

The Permittee's response to NMED's Comment 8 states, "[t]he Work Plan is not the proper document to summarize all of the detections in water samples that are collected pursuant to the Work Plan. This is done in the Annual Ground Water Monitoring Reports." It is appropriate to summarize detections in the Work Plan in order to evaluate proposed changes to the groundwater monitoring and sampling plan. When changes are proposed, present all data pertinent to the proposed changes. No response required.

#### **Comment 3**

The Permittee's response to NMED's Comment 12 states, "[t]he top of the Sonsela should be higher at OW-11 than at OW-63, not lower." Well OW-63 is located more than 500 feet east of well OW-11. Therefore, it is possible that the top of the Sonsela at OW-11 is lower than at OW-63 because it is dipping to the west/northwest. The Permittee further states, "[t]he water level elevation measured in OW-63 is generally consistent with that of surrounding wells..." Since the water level elevations in the Sonsela and Chinle/Alluvium Interface are known to be notably different, a consistent water level measured in well OW-63 in comparison to that of the surrounding wells screened to the Chinle/Alluvium Interface indicates that well OW-63 is not screened within the Sonsela. Therefore, the well is not required to be replaced. No response required.

#### **Comment 4**

The Permittee's response to NMED's Comment 13 states, "[t]he discussion in Section 2.4.4 (page 15) is revised to refer to SPH." Since separate phase hydrocarbons (SPH) were detected during the third quarter of 2015, Section 2.4.1.3 that states, "[a] measurable level of SPH was identified in GWM-1 during the fourth quarter sampling event in 2015 through November 2018," must be revised for consistency. Revise the statement and provide a replacement page.

#### **Comment 5**

The Permittee's response to NMED's Comment 17 states, "[t]he comment is acknowledged." Comment 17 states, "[s]ubmit the report summarizing the results of the inspection and repair of the NAPIS or submit an extension request." The Permittee's response to Comment 6 in the *Disapproval 2017 Annual Groundwater Monitoring Report*, dated July 5, 2019 states, "[t]he Gallup Refinery's wastewater treatment system will undergo a major upgrade. Although the exact date of the upgrade has not been established, the Gallup Refinery is on the MPC list of

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priority sites. Additionally, MPC has made the NMED aware of these plans and has shared the draft design information with the NMED. MPC will keep the NMED informed of the progress of this project." The Permittee's response to NMED's Comment 17 should have referenced the above response for clarity. Unless the plans for the upgrade are changed or canceled, the NAPIS report will not be required at this time.

**Comment 6**

The Permittee's response to NMED's Comment 19 states, "[t]he requested table [that presents applicable screening levels and detection limits for the constituents of concern] is enclosed." However, the table is not provided in the Work Plan; submit the table no later than **February 28, 2020**.

The Permittee must address all comments in this letter and submit a response letter, replacement page and table no later than **February 28, 2020**.

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 Approval with Modifications, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



Dave Cobrain  
Program Manager  
Hazardous Waste Bureau

cc: K. Van Horn, 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-WRG-19-012