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Certified Mail - Return Receipt Requested



January 24, 2022

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

**RE: APPROVAL WITH MODIFICATIONS  
HYDROCARBON SEEP INTERIM MEASURES 2021 THIRD QUARTER STATUS REPORT  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
MCKINLEY COUNTY, GALLUP, NEW MEXICO  
EPA ID # NMD000333211  
HWB-WRG-21-019**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has completed its review of the Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (Permittee) *Hydrocarbon Seep Interim Measures 2021 Third Quarter Status Report* (Report), dated October 27, 2021 and received November 1, 2021. NMED has reviewed the Report, and hereby issues this Approval with Modifications with the following comments.

**Comment 1**

In the *Fluids Recovery* section, page 3 of 96, paragraph 2 of the electronic copy of the Report, the Permittee states, “[a] total of 233 [gallons (gals)] of water and 55 gals of SPH were extracted in the 3rd Quarter. The SPH extraction data are shown in Tables 3A through 3F.” The thickness of separate phase hydrocarbons (SPH) in well MKTF-33 notably increased from 0.05 to 5.20 feet after the July 2021 SPH recovery event was conducted according to Table 3A (July Vacuum Truck Extractions – MKTF Wells). The thickness of SPH in the same well (MKTF-33) decreased from 0.18 to 0.01 feet after the September 2021 SPH recovery event was conducted according to Table 3E (September Vacuum Truck Extractions – MKTF Wells). Provide a discussion regarding the accuracy of the July 2021 measurement relative to the September 2021 measurement in the fourth quarter status report. If the data is verified to be accurate, it appears that the SPH may have mobilized at the time of the vacuum truck extracted SPH from well MKTF-33 between the July 2021 and September 2021 events and the mobilized SPH should have been captured. If a similar phenomenon is observed in the future, continue to recover SPH

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until the SPH thickness returns a thickness similar to originally observed SPH levels.

**Comment 2**

In the *Investigations, Sour Naphtha Investigation* section, page 3 of 96, bullet 1 of the electronic copy of the Report, the Permittee states, “[t]he Sour Naphtha Investigation Work Plan (IWP) was submitted to NMED on September 28, 2021, to investigate the extent of impacts from the March 26, 2017, sour naphtha release. The proposed investigation will include collection of 11 surface and 11 subsurface samples. The investigation will be completed within 60 days after receiving NMED approval.” NMED issued the *Disapproval Sour Naphtha Release Investigation Work Plan* on November 30, 2021 and directed the Permittee to submit a revised Investigation Work Plan no later than **April 4, 2022**. This comment serves as a reminder. No response is required.

**Comment 3**

In the *Investigations, AOC 35* section, page 4 of 96, bullet 2 of the electronic copy of the Report, the Permittee states, “[t]he revised AOC 35 IWP was submitted to NMED on September 1, 2021. The investigation will be completed within 60 days after receiving NMED approval.” NMED issued the *Disapproval Revised Investigation Work Plan No. 2 Area of Concern 35* on October 22, 2021 and directed the Permittee to submit a revised Investigation Work Plan no later than **March 31, 2022**. This comment serves as a reminder. No response is required.

The Permittee has fulfilled its obligation to implement source control measures to the extent practicable and to submit quarterly reports to NMED. The Permittee must continue to implement source control measures at the site and continue to submit quarterly status reports. Comment 1 must be addressed in the upcoming 2021 fourth quarter status report which must be submitted to NMED no later than **February 11, 2022**.

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 letter, please contact Michiya Suzuki of my staff at 505-690-6930.

Sincerely,



Dave Cobrain  
Program Manager  
Hazardous Waste Bureau

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cc: L. Tsinnajinnie, NMED HWB  
M. Suzuki, NMED HWB  
H. Jones, Trihydro  
L. Barr, EMNRD OCD  
L. King, EPA Region 6 (GLCRRC)

File: Reading File and WRG 2022 file