



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

Certified Mail - Return Receipt Requested



April 5, 2022

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

**RE:    RESPONSE TO APPROVAL WITH MODIFICATIONS  
      NATURAL ATTENUATION ASSESSMENT AND  
      PROPOSED WORKPLAN FOR THE HYDROCARBON SEEP AREA  
      WESTERN REFINING SOUTHWEST LLC, GALLUP REFINERY  
      MCKINLEY COUNTY, GALLUP, NEW MEXICO  
      EPA ID # NMD000333211  
      HWB-WRG-20-023**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has completed its review of the *Response to Approval with Modifications, Natural Attenuation Assessment and Proposed Workplan for the Hydrocarbon Seep Area* (Response), dated December 17, 2021 and received on December 21, 2021, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest LLC, Gallup Refinery (the Permittee). NMED hereby issues the following comment.

**Comment**

In the response to NMED's Approval with Modifications Comment 4, the Permittee states, "[g]as chromatograph [sic] and electron capture (Method 504.1) is not approved for the [chlorinated volatile organic compounds] CVOCs of interest." It is not NMED's intention to suggest that only Method 504.1 should be used to analyze the CVOCs. There are other methods that can be used to separate analytical methods where the dilution of the hydrocarbon constituents is unnecessary and chlorinated compounds can be quantified with greater sensitivity as required by Comment 4. If an alternate analytical method can achieve lower detection limits for the CVOCs of interest, please evaluate the applicability of that method for this investigation and propose to use the analytical method in the response letter.

The Permittee must address the comment above in this letter and submit a response letter no later than **April 29, 2022**.

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

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

Mr. Moore  
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If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-690-6930.

Sincerely,

**Rick Shean**

Digitally signed by Rick  
Shean  
Date: 2022.04.05 08:55:58  
-06'00'

Rick Shean  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
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