



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Certified Mail - Return Receipt Requested



June 16, 2022

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS
 INVESTIGATION REPORT, SMW-2 AND GWM-1 AREAS
 WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
 MCKINLEY COUNTY, GALLUP, NEW MEXICO
 EPA ID # NMD000333211
 WRG-21-015**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has received the Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery's (the Permittee) *Response to Approval with Modifications Revised Investigation Report, SMW-2 and GWM-1 Areas* (Response), dated March 11, 2022 and received on March 11, 2022. NMED has reviewed the Response, and hereby issues the following comments.

Comment 1

In the response to NMED's Approval with Modifications Comment 2, the Permittee states, "GWM-1 groundwater elevations varied between 6889.63 ft amsl (20.59 ft-bgs) and 6892.24 ft amsl (18.45 ft bgs), from March 2020 through September 2021. These elevations are higher than the ground surface elevation of OW-69 [6832.52 feet above mean sea level (ft amsl)]." According to Figure 2 (SMW-2 and GWM-1 Area Features), the groundwater elevation contours for the location of well GWM-1 is depicted between 6,900 to 6,890 ft amsl while those for the location of OW-69 is depicted between 6,890 and 6,880 ft amsl. Since the ground surface elevation at OW-69 is approximately 6,833 ft amsl, the groundwater contours depicted on Figure 2 contradict the surrounding ground surface elevations. Resolve the discrepancy and provide a revised Figure 2.

Comment 2

In the response to NMED's Approval with Modifications Comment 5, the Permittee states, "2-

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

Mr. Moore
June 16, 2022
Page 2

butanone and MTBE were detected due to a trip blank contamination. Therefore, VOCs in these locations are not considered to be constituents of concern in soil.” Methyl ethyl ketone (2-butanone) and MTBE must not be excluded from potential constituents of concern. The presence or absence of 2-butanone and MTBE is unknown and the Permittee must determine whether the constituents are present before they can be eliminated as constituents of concern. Provide replacement pages for all applicable sections of the Report, as necessary.

The Permittee must submit the response letter, replacement pages, the revised Figure 2, and an electronic version of the revised Report that addresses and incorporates all of the comments contained in this letter to NMED no later than **August 31, 2022**.

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: 2022.06.16
10:56:03 -06'00'

Rick Shean
Chief
Hazardous Waste Bureau

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

File: Reading File and WRG 2022 file