



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

**Certified Mail - Return Receipt Requested**

December 6, 2022

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

**RE: EXTENSION REQUEST APPROVAL FOR RESPONSE TO DISAPPROVAL  
AOC 15 - NEW API SEPARATOR AND AOC 16 - NEW API SEPARATOR OVERFLOW TANKS  
INVESTIGATION WORK PLAN  
WESTERN REFINING SOUTHWEST LLC D/B/A MARATHON GALLUP REFINERY  
EPA ID# NMD000333211  
HWB-WRG-20-003**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has received Western Refining Southwest LLC (D/B/A Marathon Gallup Refinery's (the Permittee) *Response to Disapproval Extension Request Area of Concern 15 – New API Separator and Area of Concern 16 – New API Separator Overflow Tanks Investigation Work Plan* (Request) dated November 28, 2022.

The Request states, "In preliminary testing of the fluorescent properties of media around the [New API Separator] NAPIS, it was determined that there is potential interference from separate phase hydrocarbon (SPH) impacts in soil and groundwater, and soil with impacts could fluoresce without the addition of the dye. Therefore, it can be difficult to discern if observed fluorescence is from pre-existing SPH impacts or a recently introduced dye. To evaluate if soil fluoresces in the area of the NAPIS bays prior to introduction of fluorescing dye, Western will be completing soil borings in 3 to 4 locations around the NAPIS and testing for fluorescence. Western is requesting the extension of the Response to Disapproval...to allow for the soil borings around the NAPIS to be completed and findings incorporated into a revised approach."

The Permittee has shown good cause for the request in accordance with the Permit Section I.J.12; therefore, NMED grants the extension. The Reports must be submitted to NMED no later than **March 15, 2023**, as requested.

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)

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If you have questions regarding this letter, please contact Lane Andress of my staff at 505-690-5286.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Cobrain', written in a cursive style.

Dave Cobrain  
Program Manager  
Hazardous Waste Bureau

cc: L. Tsinnajinnie, NMED HWB  
L. Andress, NMED HWB  
H. Jones, Trihydro  
L. King, EPA Region 6 (6LCRRC)

File: Reading File and WRG 2022 file