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Certified Mail - Return Receipt Requested

October 23, 2023



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

**RE: APPROVAL WITH MODIFICATIONS
NORTH/EASTERN BOUNDARY CONTROL WORK PLAN (OW-58A)
WESTERN REFINING SOUTHWEST LLC, GALLUP REFINERY
MCKINLEY COUNTY, GALLUP, NEW MEXICO
EPA ID # NMD000333211
HWB-WRG-23-020**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has completed its review of the Marathon Petroleum Company dba Western Refining Southwest LLC, Gallup Refinery (Permittee) *North/Eastern Boundary Control Work Plan (OW-58A)* (Work Plan), dated October 11, 2023 and received on October 17, 2023. NMED hereby issues this Approval with Modifications with the following comments.

Comment 1

On the cover page, the submittal is addressed to "To Whom it May Concern". The submissions must be addressed to the Bureau Chief of the Hazardous Waste Bureau (HWB) in accordance with Permit Section II.C.7. The current Acting Bureau Chief of the HWB is Mr. Ricardo Maestas and all future submittals to HWB must be addressed to him. No response is required.

Comment 2

In the *Path Forward / Recommendations* Section, pages 1 and 2, the Permittee states, "[t]o address the increased SPH thickness in OW-58A and slow further movement of the SPH north/northeast, Trihydro recommends installing a pump in OW-58A to extract total fluids which will then be transported via existing infrastructure to the existing- WWTP." NMED concurs with the Permittee's recommendation to slow movement of the Separate Phase Hydrocarbon (SPH) and install a pump in well OW-58A. Report volumes of groundwater and SPH recovered from well OW-58A in the upcoming *Hydrocarbon Seep Interim Measures Status Reports* (Status Reports).

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

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Comment 3

The July 26, 2023 *Hydrocarbon Seep Interim Measures 2023 Second Quarter Status Report* indicates that the SPH has already migrated to well OW-66 that is located farther north of well OW-58A. The Permittee must also recover SPH and groundwater from wells OW-66 and OW-55 to prevent the SPH plume from spreading farther north. Report volumes of groundwater and SPH extracted from wells OW-55 and OW-66 in the upcoming Status Reports.

Furthermore, the July 26, 2023 Status Report also states that “well RW-1 will be removed from fluid recovery.” However, since the SPH plume located northeast of the facility has been expanding, recovery well RW-1 must continue to recover residual SPH in the well and to provide hydraulic control (i.e., containment) in the vicinity. Include well RW-1 in the list of recovery wells in the upcoming status reports.

The Permittee must address the comments included in this letter and implement source control measures at the site and report the progress of the Permittee’s efforts in the upcoming quarterly Status Reports.

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,

Ricardo Maestas

Digitally signed by Ricardo
Maestas
Date: 2023.10.23 13:41:07 -06'00'

Ricardo Maestas
Acting Chief
Hazardous Waste Bureau

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

File: Reading File and WRG 2023 file