



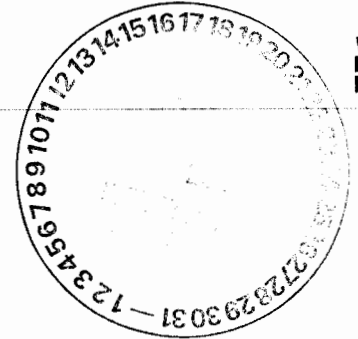
BLOOMFIELD REFINERY

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July 15, 2008

Mr. John E. Kieling, Program Manager
Permits Management Program
State of New Mexico Environmental Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Re: Evaluation of Interim Measures
Western Refining Southwest, Inc., Bloomfield Refinery
EPA ID# NMD089416416
HWB-GRCB-08-001

Dear Mr. Kieling:

Pursuant to Comment No. 2 in your letter of March 25, 2008, Western Refining Southwest, Inc., Bloomfield Refinery ("Western") has completed the three month evaluation of fluid levels in the observation and collection wells and in MW-45 and MW-47, all of which are located along the slurry wall. Depth to water and product was measured twice a week at regular intervals starting on April 1st and continuing through June 30, 2008. The data is enclosed in table form as requested.

A review of the data indicates that separate phase hydrocarbon (SPH) is present in the area of OW 1+50, MW-47, and OW 3+85. SPH was also measured in CW 8+45 and OW 11+15. These occurrences of SPH are consistent with past observations. I have included graphs of the measured thickness of SPH for wells OW 1+50, MW-47, OW 3+85, and OW 11+15. A graph was not produced for CW 8+45 as the measured thickness is very low and did not exceed 0.02 feet. As shown on the enclosed tables and graphs, the thickness did not exceed one foot in any of the wells during the evaluation period. The measured thickness in the wells did slowly increase during the evaluation period.

To further assess the potential for recovery and actual volumes of PSH in the formation near the wells, Western bailed OW 1+50, OW 3+85, OW 11+15, and MW 47. Twenty bailer volumes were removed from each well per day with a disposable hand bailer on eight days. This included four consecutive days of bailing, three days without bailing, followed by four more consecutive days of bailing. As the bailer was removed, the contents were poured into a 1,000 ml graduated cylinder and the amount of SPH and water was recorded. The total recovery volumes for each day at each well are compiled in an enclosed table. The depth to SPH and water was measured each day before bailing and immediately after removing the 20 bailers of fluid. The fluid level

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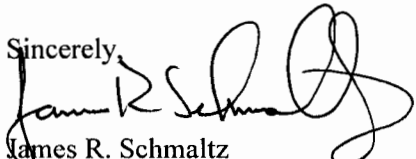
measurements are also provided in the enclosed table. Graphs showing the recovery volumes for each day and the fluid levels prior to bailing are also enclosed.

A review of the recovery data indicates that relatively small volumes of SPH were recovered. A maximum recovery of 0.36 gallons on a single day was observed at OW 3+85 and this recovery rate reduced to only approximately 0.2 gallons per day. Recovery rates at OW 1+50 and MW #47 appear to have stabilized at less than 0.1 gallons of SPH per day and less than one hundredth of a gallon of SPH was recovered at OW 11+15 by the eighth day.

An evaluation of the depth to SPH and water during the bailing test indicates a reduction in measured SPH thickness in the wells. Plots were not prepared for the fluid level measurements recorded on each day immediately at the conclusion of the bailing test because there is only a very small difference in fluid levels for SPH and water at the conclusion of the tests. This appears to indicate that most of the SPH was removed from the well bore and immediately adjacent formation and that SPH recharge rates are relatively low compared to removal rates with the bailer.

In summary there were the minor accumulations (i.e., less than one foot) of SPH under static conditions, which were observed during the three month evaluation period. The subsequent bailing tests produced very low recovery rates of SPH. Based on these results, Western recommends that recovery with passive techniques (e.g., absorbent socks) be conducted at OW 1+50, OW 3+85, OW 11+15, and MW-47. If you have additional questions or would like to discuss the evaluation further, please contact me at (505) 632-4171.

Sincerely,



James R. Schmaltz
Environmental Manager
Western Refining Southwest, Inc., Bloomfield Refinery

Enclosures

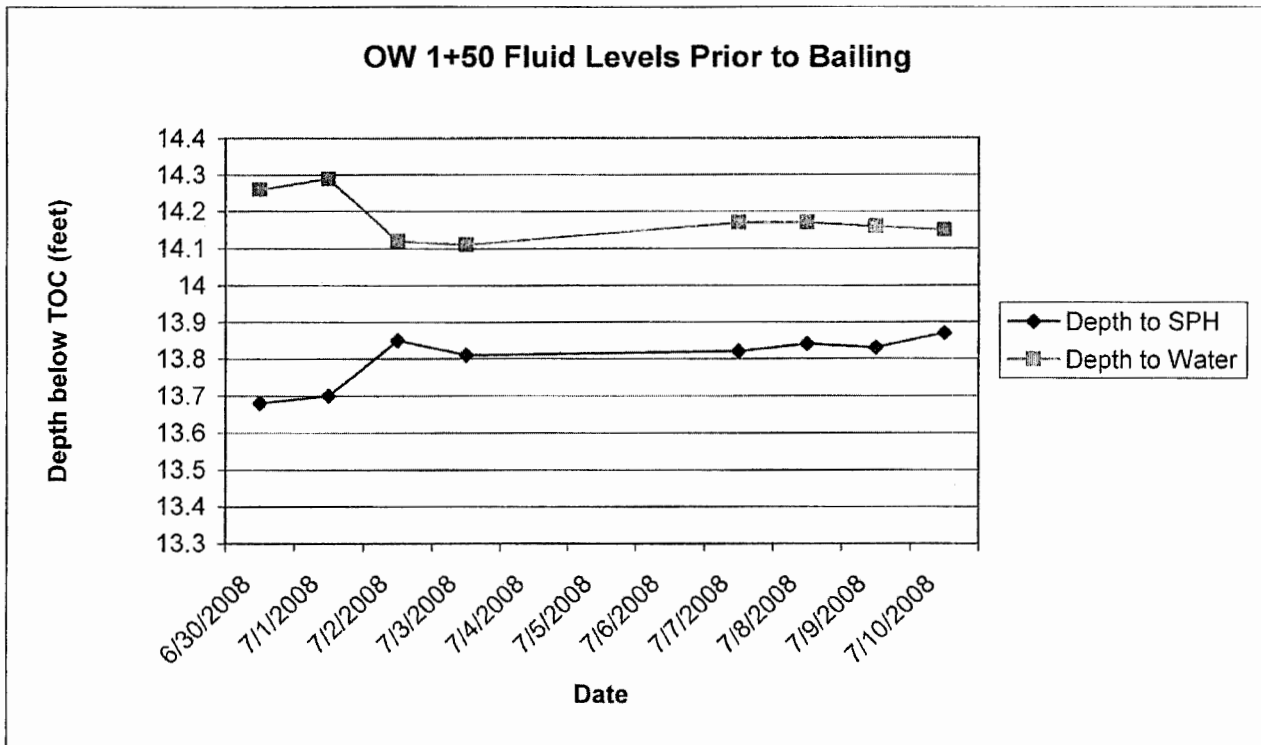
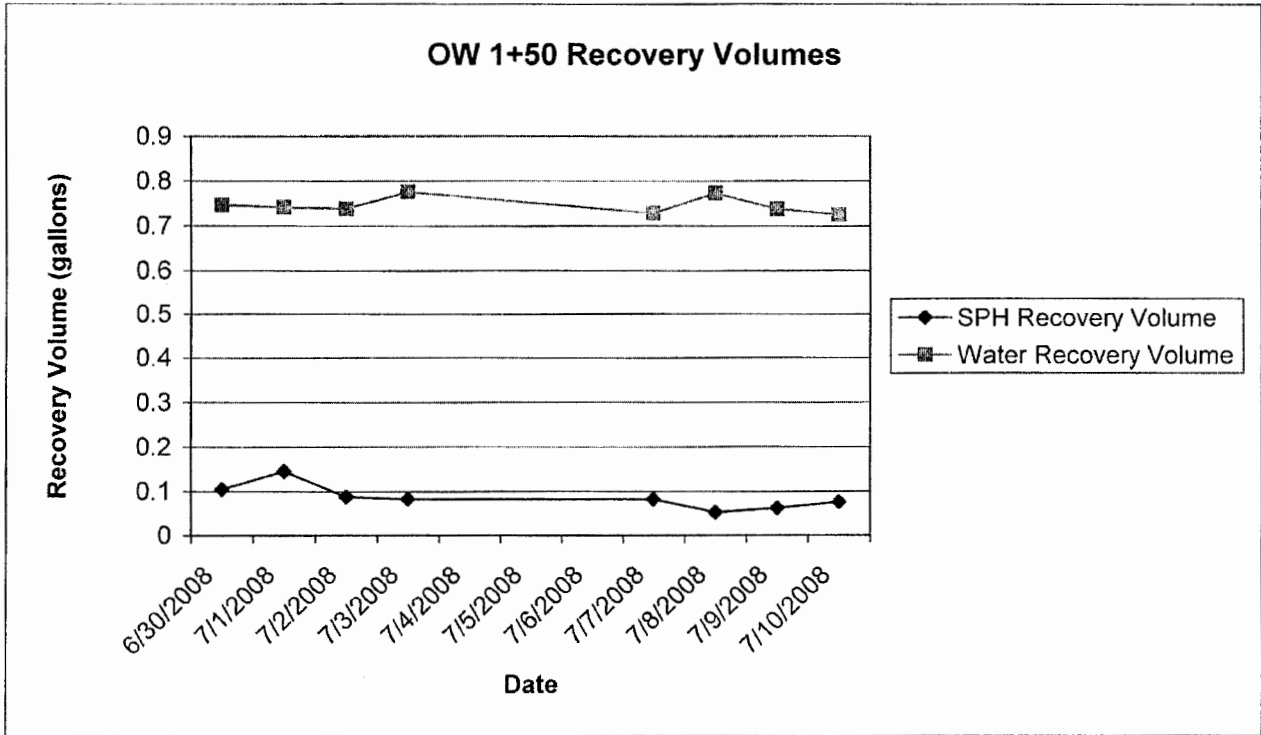
cc: H. Monzeglio – NMED HWB
D. Cobrain – NMED HWB
C. Frischkorn – NMED HWB
C. Chavez – OCD
W. Price – OCD
B. Powell - OCD Aztec Office
L. King – EPA Region 6
A. Hains – Western Refining, El Paso

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Interim Measures Evaluation

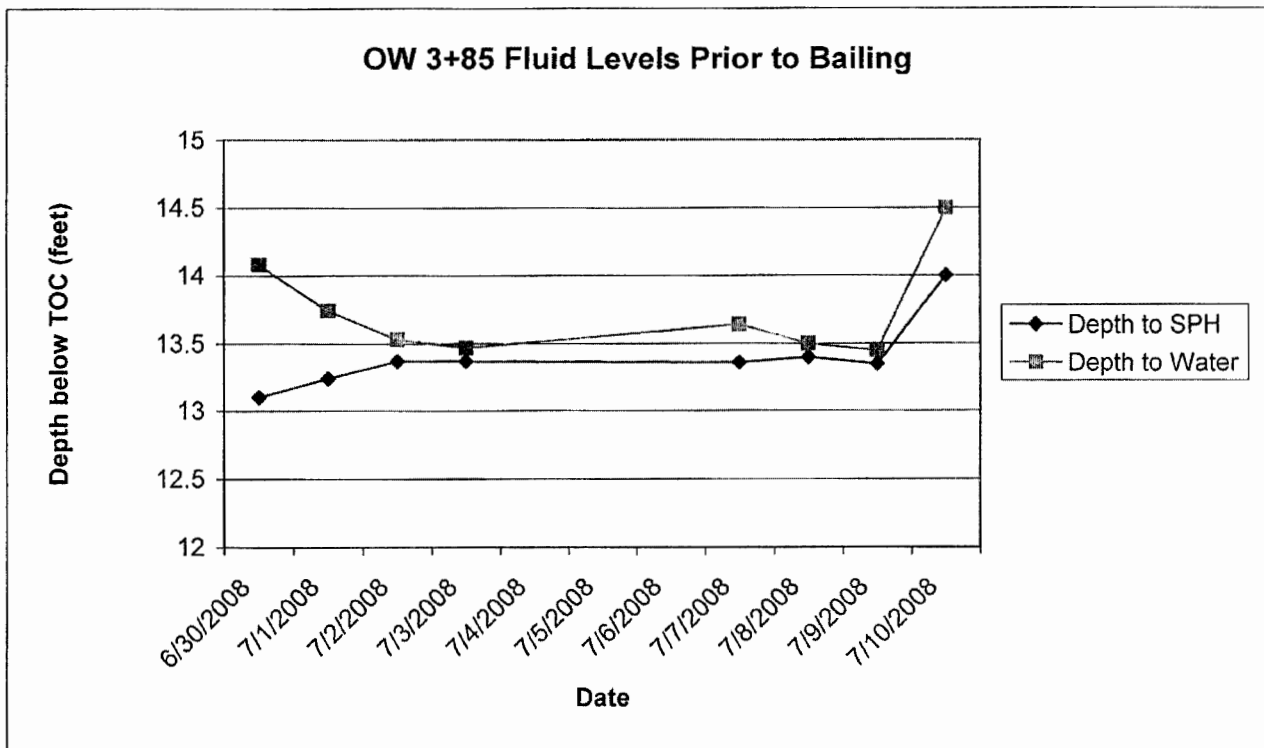
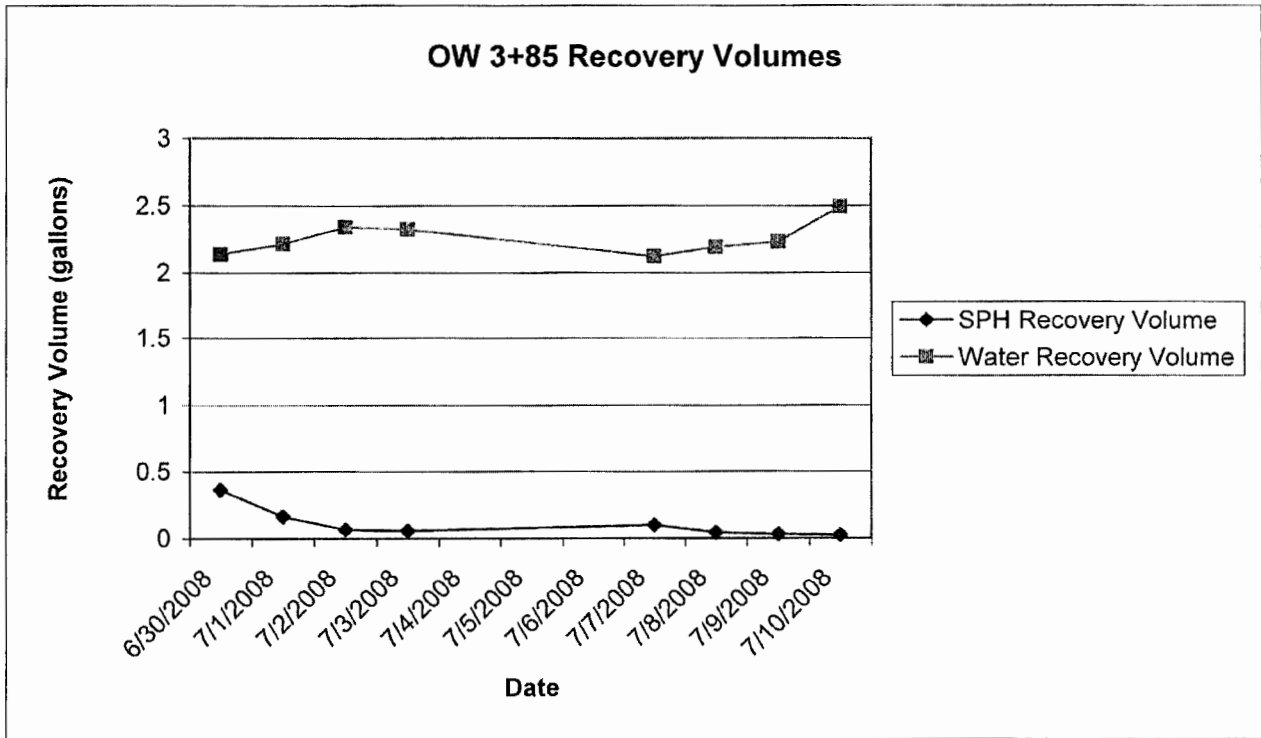
Date	SPH (gals)	Water (gals)	Total (gals)	Before Bailing		After Bailing	
				Depth to Product (ft)	Depth to Water (ft)	Depth to Product (ft)	Depth to Water (ft)
MW #47 Bailing Test Results							
6/30/2008	0.25608	0.3168	0.57288	12.68	12.42	13.96	13.98
7/1/2008	0.1716	0.39864	0.57024	12.85	13.24	14.02	14.03
7/2/2008	0.12408	0.33528	0.45936	13.66	14.19	14.02	14.04
7/3/2008	0.078408	0.385968	0.464376	12.59	13.14	13.98	13.99
7/7/2008	0.10824	0.28512	0.39336	12.88	13.17	14.04	14.06
7/8/2008	0.08184	0.34584	0.42768	12.93	13.15	14.03	14.05
7/9/2008	0.07524	0.36168	0.43692	12.88	13.06	13.95	13.98
7/10/2008	0.07524	0.40128	0.47652	12.94	13.1	14.03	14.05
OW 1+50 Bailing Test Results							
6/30/2008	0.104544	0.746856	0.8514	13.68	14.26	13.83	13.84
7/1/2008	0.1452	0.74184	0.88704	13.7	14.29	13.85	13.86
7/2/2008	0.08712	0.7392	0.82632	13.85	14.12	13.9	13.91
7/3/2008	0.082632	0.77616	0.858792	13.81	14.11	13.95	13.96
7/7/2008	0.08184	0.72864	0.81048	13.82	14.17	13.98	14
7/8/2008	0.052536	0.77352	0.826056	13.84	14.17	13.92	13.92
7/9/2008	0.06204	0.73788	0.79992	13.83	14.16	13.96	13.97
7/10/2008	0.076032	0.726	0.802032	13.87	14.15	13.98	13.99
OW 3+85 Bailing Test Results							
6/30/2008	0.363	2.14104	2.50404	13.1	14.08	13.7	13.82
7/1/2008	0.165	2.21496	2.37996	13.24	13.74	14	14.05
7/2/2008	0.066	2.34168	2.40768	13.37	13.53	14.09	14.14
7/3/2008	0.05676	2.32584	2.3826	13.37	13.47	14.01	14.05
7/7/2008	0.10032	2.1252	2.22552	13.36	13.64	14.02	14.04
7/8/2008	0.04356	2.19384	2.2374	13.4	13.5	14.33	14.35
7/9/2008	0.032208	2.2308	2.263008	13.35	13.45	14.18	14.19
7/10/2008	0.024288	2.49216	2.516448	14	14.5	14.24	14.25
OW 11+15 Bailing Test Results							
6/30/2008	0.03696	4.94208	4.97904	12.3	12.9	NPP	14.45
7/1/2008	0	4.28472	4.28472	NPP	12.34	NPP	15.06
7/2/2008	0.00528	4.24248	4.24776	12.57	12.62	NPP	14.95
7/3/2008	0.00132	4.17912	4.18044	12.35	12.36	NPP	15.15
7/7/2008	0.01584	4.16328	4.17912	12.37	12.47	NPP	15.22
7/8/2008	0.007656	4.23984	4.247496	12.34	12.36	NPP	15.47
7/9/2008	0.001848	4.08144	4.083288	12.42	12.44	NPP	15.3
7/10/2008	0.002112	4.21608	4.218192	12.41	12.42	NPP	15.4

NPP - no product present

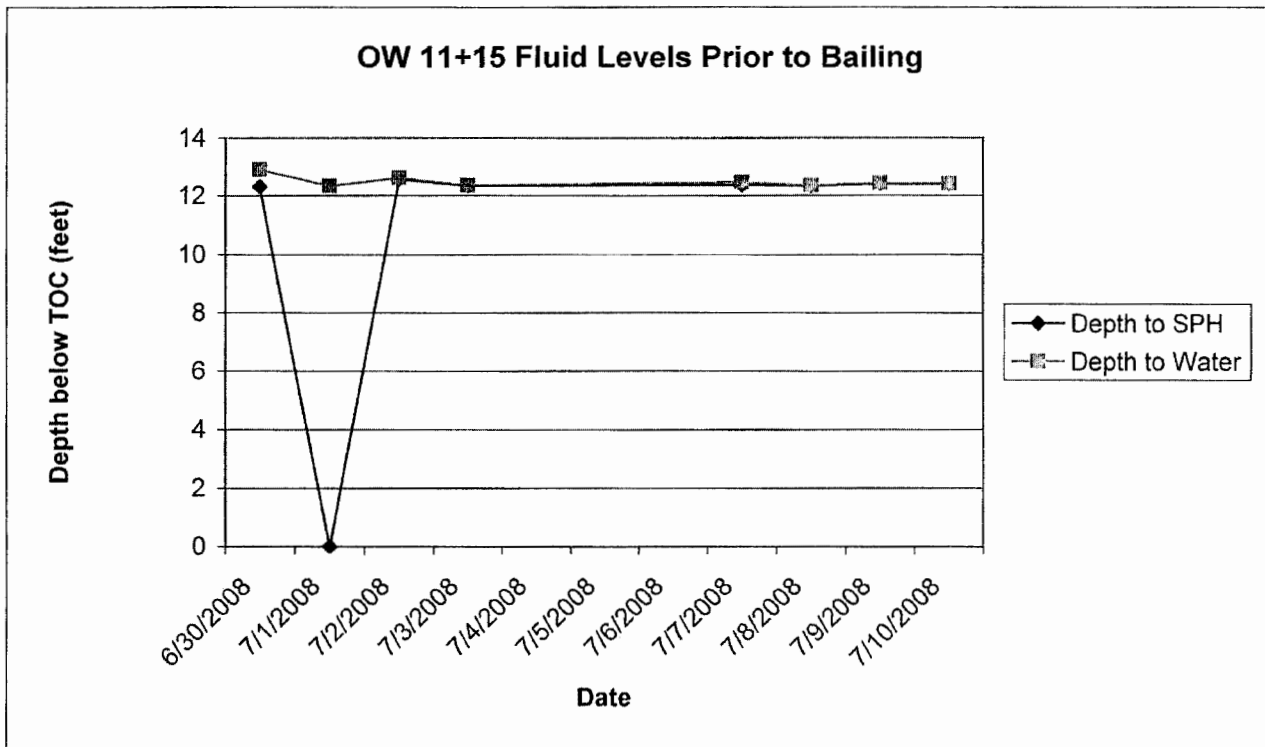
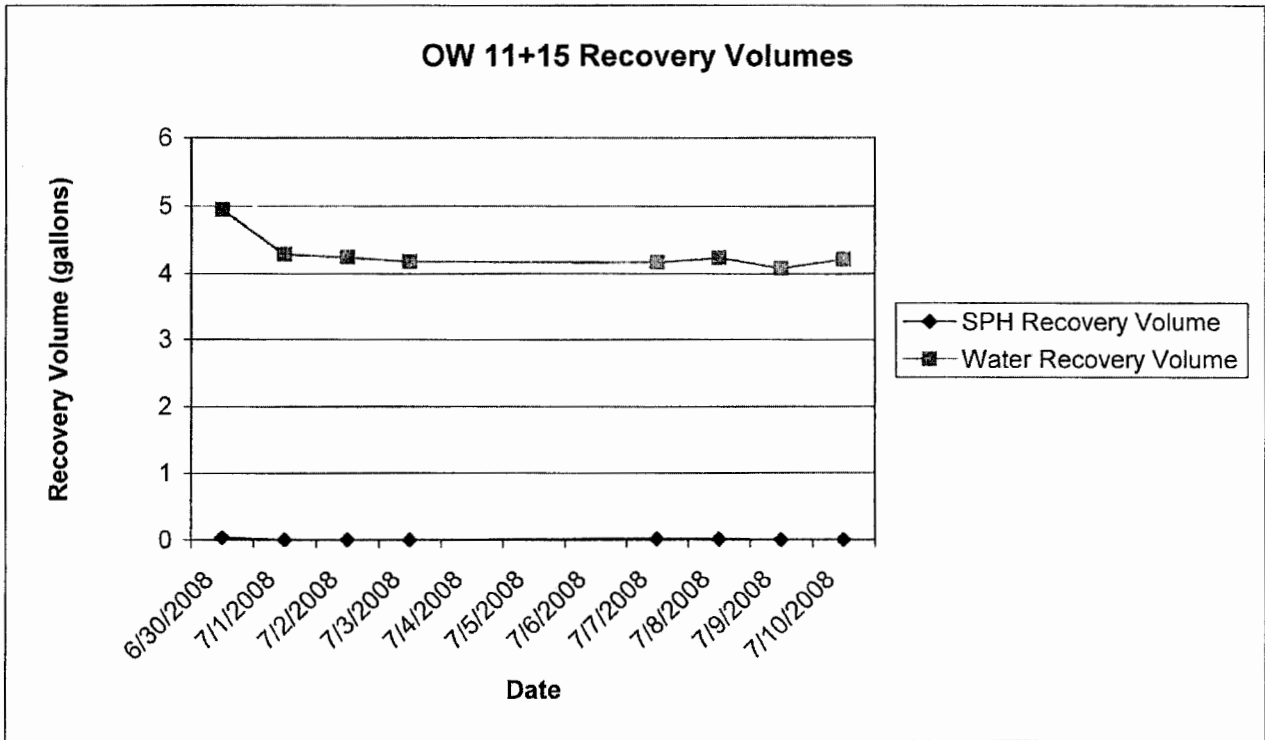
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