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NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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ENTERED



RON CURRY
Secretary

JON GOLDSTEIN
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 2, 2008

Mr. Randy Schmaltz
Environmental Supervisor
Western Refining Southwest, Inc., Bloomfield Refinery
P.O. Box 159
Bloomfield, New Mexico 87413

**RE: MONITORING REQUIREMENTS
EVALUATION OF INTERIM MEASURES
GIANT REFINING COMPANY, BLOOMFIELD REFINERY
EPA ID # NMD089416416
HWB-GRCB-08-001**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) has completed its review of Western Refining Southwest, Inc. Bloomfield Refinery's (Western) *Evaluation of Interim Measures* letter dated July 15, 2008. The letter provided a three month update for the evaluation of fluid levels in the observation and collection wells and MW-45 and MW-47. Western recommended that recovery with passive techniques (e.g., absorbent socks) be conducted at OW-1+50, OW 3+85, OW-11+15, and MW-47.

NMED, in conjunction with the Oil Conservation Division (OCD), requires Western to obtain additional information to characterize water and separate phase hydrocarbons (SPH) levels on the river side of the barrier wall rather than installing passive product recovery equipment. Until recently, since the installation of the barrier wall, scheduled pumping of total fluids from the observation, collection, and nearby monitoring wells has been conducted on a frequent basis. It is not clear if SPH thickness will remain static or increase in some of the observation and monitoring wells on the river side of the barrier wall with the cessation of pumping. It is also not clear how much water or SPH is present on the river side of the barrier wall.

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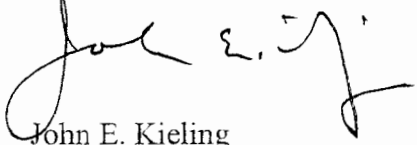
To monitor water/product thickness levels under static conditions Western must complete the following:

- a. Collect depth to water (DTW) and depth to product (DTP) measurements to an accuracy of 0.01 foot from all observation wells, MW-45 and MW-47 on a biweekly basis for six months, starting October 1, 2008. The acquired data must be compiled in table format and submitted to NMED and OCD on or before April 20, 2009. The table must contain, but is not limited to the following information: collection date, monitoring well identification, total depth of the well (indicate the measuring point (e.g., ground level or top of casing, and include the casing elevation relative to the ground surface)), DTW, DTP, and groundwater elevations. Western shall provide a corrected water table elevation in wells containing SPH by adding 0.8 times the measured product thickness to the calculated water table elevation.
- b. Because there is no clear solution of how to recover product on the river side of the barrier wall, Western must submit a plan to NMED and OCD that proposes the hydraulic characterization of the aquifer on the downgradient (river) side of the barrier wall. The plan must be submitted to NMED and OCD on or before November 17, 2008. The information will be used to determine if an active recovery system will be effective in the removal of product on the river side of the barrier wall.
- c. If more than one foot of SPH is discovered in any observation well, MW-45, or MW-47 located on the river side of the barrier wall during water/product level monitoring, NMED and OCD must be notified within two business days.

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If you have questions regarding this Approval with Direction please contact Hope Monzeglio of my staff at 505-476-6045.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke at the end.

John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
H. Monzeglio, NMED HWB
W. Price, OCD
C. Chavez, OCD
B. Powell, OCD Aztec Office
L. King, EPA Region 6
File: HWB-GRCB-08-001 and Reading