



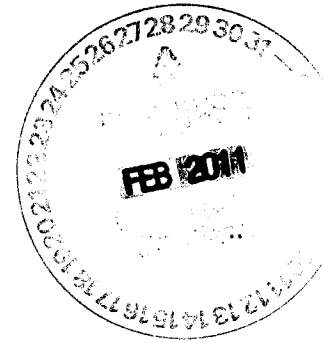
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February 25, 2011

Certified Mail: 7010 1870 0000 0709 4853

Hope Monzeglio
New Mexico Environmental Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Bldg 1
Santa Fe, NM 87505



Re: Proposals to Modify Monitoring at the Bloomfield Refinery River Terrace Area

Dear Ms. Monzeglio,

Western Refining Southwest, Inc. – Bloomfield Refinery (Western) would appreciate NMED's consideration and approval to modify the current monitoring activities at the Bloomfield Refinery River Terrace area. The proposals put forth for consideration are based on a detailed review of the River Terrace monitoring results obtained over the past five years.

Background

The Bioventing System at the Bloomfield Refinery River Terrace has been operational since January 2006. The purpose of the Bioventing System is to promote and sustain bioremedial activity within the impacted vadose zone located along the western portion of the River Terrace area. This is accomplished by providing oxygen to the subsurface through air injection, thus creating and sustaining an aerobic environment for microbial activity. The bioventing system includes a dewatering system, which currently consists of two dewatering wells and a fluids collection trench. Each of the dewatering wells and fluid collection trench are equipped with a submersible pump. Fluids from the dewatering system are pumped through two granular activated carbon (GAC) filters that operate in series prior to discharging to the Refinery's Raw Water Ponds. Operation of the dewatering system is interlocked with the river pumps that pump fresh water up to the refinery. The operation of the dewatering system helps increase the vadose zone and thus enhances bioremediation activity.

Following suspension of refining operations in November 2009, operation of the dewatering portion of the Bioventing System has been infrequent due to the lessened demand for fresh water to support current facility operations. Although the air injection system has continued to operate, Western is currently evaluating alternatives for enhanced on-going system operation.

With that said, Western has reviewed the past five years of analytical data collected since commencement of Bioventing System operations. Based on our review, we would like to propose modifications to the existing soil gas, groundwater, and GAC system sampling conducted at the River Terrace area. The intent of the reduced sampling proposals is to focus sampling efforts on collecting data that provides on-going value in monitoring remedial activities, while then redirecting attention to optimizing on-going

remediation activity in the area. The recently submitted *2010 Bloomfield Refinery River Terrace Voluntary Corrective Measures Bioventing System Annual Report* dated March 2011 provides recent and historical data collected since commencement of bioventing system operations. The historic River Terrace analytical data as summarized in the 2010 Annual Report provides supporting documentation that pertain to the proposals presented below, and thus the respective supporting documentation sections are referenced in this letter to facilitate NMED's review.

Proposal #1: Modification of Soil Gas Monitoring at the River Terrace

Soil Gas Monitoring Overview

Over the past five years, soil gas samples have been collected for laboratory analysis and analyzed for benzene, toluene, ethylbenzene, total xylenes (BTEX), and total petroleum hydrocarbons (TPH) – gasoline range organics (GRO). Concurrently, field soil gas measurements (VOCs, O₂, and CO₂) have been collected using a Photo Ionization Detector (PID) and multi-gas meter.

Prior to the 4th quarter of 2009 and starting when the system was commissioned in January 2006, soil gas samples were collected on a quarterly basis for laboratory analysis from each of the 13 TP wells, DW-1, and MW-49. Since the 4th quarter of 2009 to present, soil gas sampling decreased to semi-annual only for the TP wells located on the east side of the River Terrace (TP-3, 10, 11, 12, and 13) per NMED's approval. Soil gas samples from the remaining wells continued to be collected on a quarterly basis.

Based on review of the past five years of data, it is apparent that the concentration in soil gas has significantly decreased since the commissioning of the biovent system. Several reasons can be potential contributing factors to this decreasing trend, such as a decrease in the hydrocarbon food source as a result of bioremedial activity, and/or continuous air sparging of the vadose zone from on-going operation of the air injection system.

Soil Gas Monitoring Proposal

Western would like NMED's approval to cease on-going collection of soil gas samples for laboratory analysis at all wells (including TP wells, DW-1, and MW-49) at the River Terrace area. Concurrent PID readings correlate with the soil gas concentrations detected through analytical results, and thus show that such field data is sufficient for monitoring soil gas concentrations at the River Terrace. Trend graphs included in the 2010 River Terrace Annual Report clearly show this correlation. Refer to Section 5.0, Tabs #9, #10, and #11 of the 2010 River Terrace Annual Report for supporting soil gas data.

In addition, Western requests NMED's approval to limit the collection of soil gas field parameters to only those wells located within the west side of the River Terrace (TP-1, 2, 5, 6, 7, 8, 9, DW-1, and MW-49). With the exception of the elevated soil gas concentrations detected at the initial start-up of remedial activity at the River Terrace, the field data and soil gas analytical results of samples collected from the east side TP wells (TP-3, 10, 11, 12, and 13) have remained low to non-detect. Over the past two years, soil gas analytical results of samples collected from each of the east side wells have been reported as non-detect for BTEX and GRO (refer to Section 4.0, Tab #1 of the 2010 River Terrace Annual Report for supporting data). Western feels that on-going

collection of field measurements during the summer months (semi-annually) would be a sufficient and reliable source of monitoring soil gas concentrations.

Proposal #2: Modification of Groundwater Monitoring at the River Terrace

Over the past five years, groundwater samples have been collected for laboratory analysis and analyzed for BTEX, TPH-GRO, TPH-DRO, barium, chromium, lead, and mercury (mercury analysis was only required for DW-1).

East Side of River Terrace

Groundwater Monitoring Overview

Prior to the 3rd quarter of 2009, groundwater samples were collected from wells located within the east side of the River Terrace (TP-3, 10, 11, 12, and 13) on a quarterly basis and analyzed for BTEX, TPH-DRO, TPH-GRO, and lead. In addition, samples for metals analysis (barium and chromium only) were collected on an annual basis from each of the east side wells.

In September 2009, the frequency of groundwater sample collection from the east side wells changed from quarterly to semi-annually, per NMED's approval. Therefore from 4th quarter 2009 to present, groundwater samples have been collected on a semi-annual basis. The analyte list for each sampling event remained unchanged.

Since the beginning of 2006, analytical results for samples collected from the east side River Terrace wells were all non-detect for BTEX, TPH-DRO, and TPH-GRO. In addition, analytical results for barium, chromium, and lead have remained below all respective conservative regulatory screening levels with the exception of four isolated detections of lead above the regulatory screening level. The most recent detection of lead over the respective screening level was from a sample collected at TP-3 over 1-1/2 years ago. Analytical results of lead at this location prior and following this detection were consistently non-detect (refer to Section 4.0, Tab #3 of the 2010 Annual River Terrace Report).

Groundwater Monitoring Proposal

Based on review of the analytical data collected over the past five years, Western would like NMED's approval to cease on-going collection of groundwater samples for laboratory analysis at TP-3, TP-10, TP-11, TP-12, and TP-13. The data collected thus far shows that groundwater concentrations have consistently remained non-detect. The locations of these wells have been noted in prior reports to not be located within the area of historic impacts at the River Terrace. Therefore Western feels that data from these locations do not provide value in determining the remedial progress within the River Terrace area.

West Side of River Terrace

Groundwater Monitoring Overview

Since commencement of the bioventing system in January 2006, groundwater samples have been collected from each the west side River Terrace TP wells (TP-1, 2, 5, 6, 7, 8, and 9), DW-1, and MW-49 on a quarterly basis and analyzed for BTEX, TPH-DRO, TPH-GRO, lead, and mercury (mercury analysis was only required for DW-1). In addition, samples for metals analysis (barium and chromium only) have been collected on an annual basis.

Over the last four years, quarterly analytical results for samples collected from TP-7, TP-9, and DW-1 have been non-detect for BTEX, TPH-DRO, and TPH-GRO. Quarterly analytical results for mercury at DW-1 have also been non-detect with the exception of the one sample collected in 2009 that reported at a detected concentration (0.0008 mg/L) that was below the respective conservative screening level (0.002 mg/L). In addition during this same time period, detected concentrations of lead, barium, and chromium have been consistently below all respective conservative regulatory screening levels (refer to Section 4.0, Tab #3 of the 2010 Annual River Terrace Report).

Groundwater Monitoring Proposal

Based on review of the analytical data collected over the past five years, Western would like NMED's approval to cease on-going collection of groundwater samples for laboratory analysis at TP-7, TP-9, and DW-1. The data collected thus far shows that groundwater concentrations have consistently remained non-detect and/or below the respective most conservative regulatory screening levels. The locations of these wells have been noted in prior reports to not be located within the area of historic impacts at the River Terrace. Therefore Western feels that data from these locations do not provide value in determining the remedial progress within the River Terrace area.

Of the remaining wells within the west side of the River Terrace (TPs #1, #2, #5, #6, #8 and MW #49) that will be sampled, Western would like NMED's approval to remove barium and chromium from the analyte list. All analytical data collected over the last five years shows that detected levels of each analyte have not exceeded the respective most conservative regulatory screening levels (refer to Section 4.0, Tab #3 of the 2010 Annual River Terrace Report).

In addition, Western would like to reduce sampling frequency of the remaining wells within the west side of the River Terrace (TPs #1, #2, #5, #6, #8 and MW #49) from quarterly to semi-annually. Biological activity is minimal during cold weather months (first and fourth quarters) and data collected during that time does not provide significant value. Western would like to collect samples in April or May and again in September of each year.

Proposal #3: Modification of GAC Filter System Sampling at the River Terrace

GAC Filter System Sampling Overview

Since the start of the biovent system in January 2006, water samples have been collected at the outlet of the lead GAC filter on a monthly basis to monitor breakthrough. In addition, water samples collected at the GAC system inlet and at the outlet of the lag GAC filter have been collected on a quarterly basis. All water samples have been analyzed for BTEX, TPH-DRO, and TPH-GRO.

In April 2007, the lead GAC filter was replaced immediately following confirmation of breakthrough. Since that time, based on monthly water samples collected, confirmation of breakthrough through the lead GAC filter has not been detected.

Operation of the dewatering system has become infrequent due to the decreased demand for fresh water to support current facility operations. Therefore, the loading rate into the GAC system has decreased drastically.

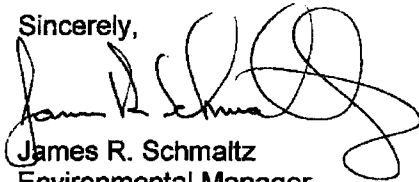
GAC Filter System Sampling Proposal

Western would like NMED's approval to change the frequency of breakthrough sampling from monthly to quarterly. Based on the loading rate on the GAC during the most effected period of dewatering, there were no detections above laboratory detection limits during the initial 15-months of system operation. Therefore, Western feels that quarterly monitoring of breakthrough, in addition to the current configuration of the GAC filters (operating in series), would be sufficient to effectively monitor GAC breakthrough and schedule GAC changes-out as needed.

Any approved proposals will be included in the Facility-Wide Groundwater Monitoring Plan submittal in June 2011.

If you have questions or would like to discuss any aspect of the proposals, please contact me at (505) 632-4171.

Sincerely,



James R. Schmaltz
Environmental Manager
Bloomfield Refinery

Cc: Allen Hains – Western Refining – El Paso