

May 5, 2011

James Bearzi, Bureau Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg 1
Santa Fe, NM 87505

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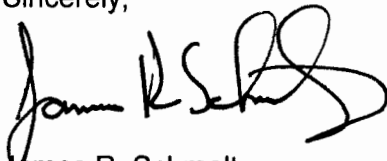
**RE: Response to Approval with Modifications
Investigation Work Plan for Determination of Background Concentrations
Western Refining Southwest, Inc., Bloomfield Refinery
EPA ID # NMD089416416
WRB-10-006**

Dear Mr. Bearzi:

Western Refining Southwest, Inc., Bloomfield Refinery has enclosed a replacement page to the revised Investigation Work Plan Background Concentrations dated February 2011 as requested by the New Mexico Environment Department in the Approval with Modifications letter (refer to Comment 4) dated March 30, 2011.

If you have questions or would like to discuss the revised work plan, please feel free to contact me at (505) 632-4171.

Sincerely,



James R. Schmaltz
Health, Safety, Environmental, and Safety Director
Western Refining Southwest, Inc. - Bloomfield Refinery

cc: Hope Monzeglio – NMED HWB (w/attachment)
Carl Chavez – NMOCD (w/attachment)
Dave Cobrain – NMED HWB
John Kieling – NMED HWB
Allen Hains – Western Refining El Paso
Scott Crouch – RPS Austin

determined by monitoring, at a minimum, ground water pH, specific conductance, dissolved oxygen concentrations, oxidation-reduction potential, and temperature after every two gallons or each well volume, whichever is less, has been purged from the well. Purging will continue, as needed, until the specific conductance, pH, and temperature readings are within 10 percent between readings for three consecutive measurements. The volume of ground water purged, the instruments used, and the readings obtained at each interval will be recorded on the field-monitoring log. Well purging may also be conducted in accordance with the NMED's Position Paper *Use of Low-Flow and other Non-Traditional Sampling Techniques for RCRA Compliant Groundwater Monitoring* (October 30, 2001, as updated).

4.3.4 Ground Water Sample Collection

Ground water samples will be collected within 24 hours of the completion of well purging using dedicated bailers or disposal bailers. Alternatively, well sampling may also be conducted in accordance with the NMED's Position Paper *Use of Low-Flow and other Non-Traditional Sampling Techniques for RCRA Compliant Groundwater Monitoring* (October 30, 2001, as updated). Sample collection methods will be documented in the field monitoring reports. The samples will be transferred to the appropriate, clean, laboratory-prepared containers provided by the analytical laboratory. Sample handling and chain-of-custody procedures will be in accordance with the procedures presented below in Section 4.4.

Ground water samples intended for metals analysis will be submitted to the laboratory for both total and dissolved metals analyses as specified in Section 4.8. QA/QC samples will be collected to monitor the validity of the ground water sample collection procedures as follows:

- Field duplicate water samples will be obtained at a frequency of ten percent, with a minimum, of one duplicate sample per sampling event; and
- Equipment rinsate blanks will be obtained for chemical analysis at the rate of ten percent or a minimum of one rinsate blank per sampling day. Equipment rinsate blanks will be collected at a rate of one per sampling day if disposable sampling equipment is used. Rinsate samples will be generated by rinsing deionized water through unused or decontaminated sampling equipment. The rinsate sample will be placed in the appropriate sample container and submitted with the ground water samples to the analytical laboratory for the appropriate analyses.

4.4 Sample Handling

At a minimum, the following procedures will be used at all times when collecting samples during investigation, corrective action, and monitoring activities: