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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 25, 2014

Randy Schmaltz
Health, Safety, Environmental, and
Regulatory Director
Western Refining, Southwest, Inc.
Bloomfield Refinery
P.O. Box 159
Bloomfield, New Mexico 87413

**RE: APPROVAL WITH MODIFICATIONS
FACILITY-WIDE GROUNDWATER MONITORING PLAN – JUNE 2013
WESTERN REFINING SOUTHWEST INC., BLOOMFIELD REFINERY
EPA ID# NMD089416416
HWB-WRB-13-005**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) has received Western Refining Southwest, Inc., Bloomfield Refinery's (Western) *Facility-Wide Groundwater Monitoring Plan* (Monitoring Plan) dated June 2012. NMED has reviewed the Monitoring Plan and hereby issues this approval with the following modifications.

1. Cover letter, bullet 1:

NMED's Comment: Western proposes to remove MW-8 from the monitoring and sampling program because the casing has been damaged at the monitoring well. If the monitoring well is damaged beyond repair, Western must abandon the monitoring well in accordance with Section

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IX.D. (Well Abandonment) of the July 27, 2007 Order (Order) which requires approval from NMED and the New Mexico Office of the State Engineer to abandon wells from the monitoring program. The Permittee must plug and abandon the wells in accordance with 19.27.4 NMAC *Rules and Regulations Governing Well Driller Licensing Construction, Repair, and Plugging of Wells* and submit the abandonment report for monitoring well MW-8 within thirty days upon completion.

2. Cover letter, bullet 2:

NMED'S Comment: Western proposes to remove monitoring wells MW-50 and MW-51 from Table 3 because the sampling requirements from Comment 2 of NMED's December 21, 2009 response to *SPH Recovery at Observation Wells and Routine Facility-Wide Groundwater Monitoring* have been met at these two monitoring wells. Western proposes to utilize MW-1, MW-67, MW-68, and MW-70 to characterize the water quality within the northwestern portion of the Bloomfield facility. NMED approves the removal of MW-50 from the sampling program; however, MW-51 must continue to be sampled. In addition, MW-50 must continue to be monitored for water elevations. Provide replacement pages for the appropriate sections of the Monitoring Plan.

3. Cover letter, bullet 3:

NMED's Comment: Western proposes to discontinue groundwater analysis for semi-volatile organic compounds (SVOCs) for monitoring wells MW-52, MW-53, MW-55, MW-59, MW-60, MW-62, MW-63, MW-64, MW-65, MW-67, and MW-68. However, NMED does not agree with discontinuing SVOC analysis at all of these monitoring wells. Diesel range organic (DRO) results at monitoring wells MW-59 and MW-65 continue to exceed the "unknown oil" standard of 0.2 milligrams per liter (mg/L). If the results continue to exceed the DRO standard at these monitoring wells, SVOCs must continue to be sampled at MW-59 and MW-65. In addition, monitoring well MW-55 has not met the minimum requirements for analyzing SVOC samples for two years because free product is present in the monitoring well. Past data results indicate SVOCs and DRO exceedances in MW-55. Western must sample and analyze groundwater at MW-55 annually for two years once product is no longer present in the monitoring well. After Western has met the requirement, the sampling frequency at monitoring well MW-55 may be reevaluated. Additionally, if monitoring wells MW-52, MW-53, MW-60, MW-62, MW-63, MW-67, and MW-68 consistently contain concentrations of DRO exceeding the "unknown oil" standard for three years, SVOCs must be analyzed at least once the following year. Provide replacement pages for the appropriate sections of the Monitoring Plan.

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4. Table 1, page 1 of 3:

NMED's Comment: The measured total depths of monitoring well MW-25 (21.31 feet) and recovery well RW-3 (25.4 feet) are above the screened intervals reported in Table 1 (22-36 feet and 16.5-32.2 feet, respectively). Provide the previous monitoring data for these wells and discuss if Western plans to remove the sediment from the monitoring wells. In addition, compare the total depths of each monitoring well to the reported screened intervals and assess whether the measured total depths are above the screened intervals.

5. Appendix A:

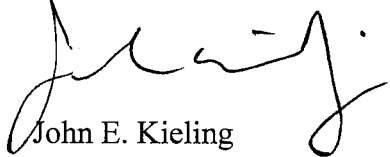
NMED's Comment: The July 27, 2007 Order does not require Western to submit well completion logs with the Work Plan. Western must only submit well completion logs for newly installed monitoring wells and recovery wells or wells that have been modified.

6. General comment:

NMED's Comment: Western must include changes and modifications to the Monitoring Plan in the appropriate sections of future monitoring plans. Western must provide the replacement pages required by this letter no later than **June 30, 2014**.

If you have any questions regarding this letter, please contact Leona Tsinnajinnie of my staff at (505) 476-6057.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
N. Dhawan, NMED HWB
L. Tsinnajinnie, NMED HWB
A. Hains, Western Refining Company, El Paso, Texas
K. Robinson, Western Refining Company, Bloomfield, New Mexico

File: HWB-WRB-13-005 and Reading 2014