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602
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RED GRCC 1997
July 18, 1997

Michael Chacono
New Mexico Environment Department
Hazardous & Radioactive Material Bureau
P.O. Box 26110
Santa Fe, New Mexico 87502

Re: Financial Assurance for Giant Industries Arizona, Inc. and San Juan Refining Company

Dear Mr. Chacono:

I am the Chief Financial Officer of Giant Industries Inc. This letter is in support of this firm's use of the financial test to demonstrate financial assurance for closure and post-closure costs, as specified in subpart H of 40 CFR parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure care is demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and /or post -closure cost estimates covered by the test are shown for each facility:

Giant Refining Company - Ciniza Refinery	
EPA ID Number: NMD 000333211	
Exit 39, East Interstate Highway 40	
Gallup, New Mexico 87301	
Closure cost estimate -	\$ 81,271
Post-closure cost estimate -	\$115,758
Total closure/post-closure cost estimate-	\$197,029

San Juan Refining Company - Bloomfield Refinery
EPA ID Number: NMD 089416416

#50 County Road 4990
 Bloomfield, New Mexico 87413
 Closure cost estimate - \$ 24,529
 Post-closure cost estimate - \$
 Total closure/post-closure cost estimate- \$ 24,529

2. This firm guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, the closure or post-closure care of the following facility owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure so guaranteed are shown for each facility:

Giant Refining Company - Ciniza Refinery
 EPA ID Number: NMD 000333211
 Exit 39, East Interstate Highway 40
 Gallup, New Mexico 87301
 Closure cost estimate - \$197,029

San Juan Refining Company - Bloomfield Refinery
 EPA ID Number: NMD 089416416
 #50 County Road 4990
 Bloomfield, New Mexico 87413
 Closure cost estimate - \$24,529

The firm identified above (Giant Industries Inc.) is the direct or higher-tier parent corporation of the owner or operator (San Juan Refining Company and Giant Refining Company).

3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for this facility:

None

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in subpart H of 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

None

The firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures of the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1996.

1.	Sum of current closure and post-closure cost estimate:	\$221,558
*2.	Total liabilities:	\$201,883,000
*3.	Tangible net worth:	\$122,124,000
*4.	Net worth:	\$122,124,000
*5.	Current assets:	\$ 86,506,000
*6.	Current liabilities:	\$ 64,965,000
7.	Net working capital (line 5 minus line 6)	\$ 21,541,000
*8.	The sum of net income plus depreciation, depletion, and amortization:	\$34,711,000
*9.	Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.):	Not required
10.	Is line 3 at least \$10 million?	Yes
11.	Is line 3 at least 6 times line 1?	Yes
12.	Is line 7 at least 6 times line 1?	Yes

- *13. Are at least 90% of the firm's assets located in the U.S.? If not, complete line 14. Yes
14. Is line 9 at least 6 times line 1? Not required
15. Is line 2 divided by line 4 less than 2.0? Yes
16. Is line 8 divided by line 2 greater than 0.1? Yes
17. Is line 5 divided by line 6 greater than 1.5? No

I hereby certify that the wording of this letter is substantially identical to the wording specified in 40 CFR 264.151 (f) as such regulations were constituted on the date shown immediately below.

A. Wayne Davenport
A. Wayne Davenport
Chief Financial Officer

7/18/97
Date

cc: Morgan Gust