



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Steve Pullen

February 16, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-259-018

Ms. Dorinda Mancini
Environmental Manager
Giant Refining Co.
Route 3, Box 7
Gallup, NM 87301

**RE: Comprehensive Facility Investigation Work Plan
Ciniza Refinery
Discharge Plan GW-032
McKinley County, New Mexico**

Dear Ms. Mancini:

The New Mexico Oil Conservation Division (OCD) has completed a review of the Giant Refining Company (Giant) "Comprehensive Facility Investigation Work Plan" received July 1, 1997. This document contains Giant's plan to plug numerous existing refinery monitor wells and replace them with several boundary wells.

The above referenced work plan does not plan to determine the extent of soil and ground water contamination at the refinery as required by the OCD in a letter to Giant dated February 28, 1997. Pursuant to the OCD letter dated February 28, 1997, please submit a comprehensive facility investigation work plan that will determine the extent of soil and ground water contamination at the refinery. Please refer to Water Quality Control Commission Regulation 4106.C in the preparation of the work plan.

In order for the OCD to properly evaluate the work plan, the OCD also requires that Giant submit the following additional information:

1. A tabular summary of all past and present laboratory analytic results of water quality and remediation system sampling for all monitor and recovery wells.
2. A current water table potentiometric map for the refinery using the water table elevations from all monitor and recovery wells.

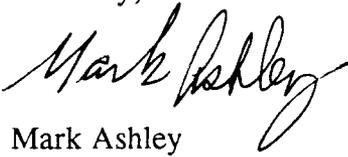
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3. A current product thickness map for the refinery using product thickness measurements from all monitor and recovery wells.

Please submit the above mentioned work plan to the OCD by April 16, 1998.

If you have any questions, please call me at (505) 827-7155.

Sincerely,



Mark Ashley
Geologist

xc: Aztec OCD District Office
Steve Pullen, NMED-HRMB