

GR02000



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April 06, 2000

Mr. Wayne Price  
Environmental Bureau  
New Mexico Oil Conservation Division  
2040 S. Pacheco St.  
Santa Fe, New Mexico 87505

**RE: Comprehensive Facility Investigation Work Plan  
Ciniza Refinery - Discharge Plan GW - 32**

Dear Mr. Price:

This letter and the included attachments have been prepared to reply to the OCD's request for additional information regarding The 'Comprehensive Facility Investigation Work Plan' submitted to your office in July, 1997. Activities completed or in progress since the original Work Plan was submitted are also discussed so that your office will have a current picture of soil and groundwater conditions at the Refinery.

**Determination of Extent of Soil and GW Contamination:** In Mark Ashley's letter of February 16, 1998, he states the Work Plan as submitted does not plan to determine the extent of soil and ground water contamination at the Refinery as required by the OCD letter of February 28, 1997. Giant believes that all areas of contamination have been determined and that the extent, both horizontally and vertically have been defined. The work plan as submitted lists these areas. Giant does not plan any further investigative work at this time.

Giant's RCRA Part B permit lists 13 Solid Waste Management Units (SWMUs) and, recently, NMED-HRMB has described the API Separator as possibly #14. A list of the SWMUs and their status is included as Attachment A. Work is ongoing with almost all Corrective Action completed. SWMU 6 (the Tank Farm) will be in active recovery as long as free product exists. SWMU 8 (the Railroad Rack Lagoon) is in active remediation. Giant expects this to continue for several years. In addition, Giant has a RCRA Post Closure Permit Application for the Land Treatment Unit (LTU) in review at HRMB and EPA. It is anticipated that this draft permit will go for public comment in April 2000.

**Analytical Data from GW Wells:** A tabular summary of Ciniza's groundwater wells analytical data for BTEX is included as Attachment B. Since the original work plan was submitted, several new recovery wells have been installed and several wells have been closed. Recovery Wells 5 and 6 were drilled on August 27, 1997. They are located WNW of Tank 345 (RW 6) and North of Tank 345 (RW 5). In the same area, Wells OW 16, OW 17 (a.k.a RW 4), OW 25 (a.k.a RW 3) and OW 26 were closed. Well logs for RW 5 and RW 6 and closure reports for these OW wells are included as Attachment C.

Wells OW 16 and 26 (Sonsella wells) were closed because of concern that any leak from a line or tank could introduce hydrocarbons directly into the Sonsella Aquifer. These wells were located within diked product storage areas.

Wells OW 17 and OW 25 had been converted into recovery wells because free product had been found in them. These wells directly connected the top of the Sonsella with the zone on top of the Chinle shale. Although the contamination rested on top of the Chinle shale, Giant was concerned that a drop in artesian pressure from the Sonsella could occur and that the free product might enter the Sonsella Aquifer. Giant chose to replace these two wells with RW 5 and 6, which were not drilled into the Sonsella, but only to the Chinle shale. These recovery wells are monitored and bailed when found to contain free product.

Well OW 20 was closed on January 15, 1999. This well was originally drilled into the Sonsella, but screened above in a "mudstone" zone. It had been damaged and repaired twice since it was installed. In the last few years, we have been unable to produce enough water to purge and sample at this well. Efforts to drill a replacement well near the original site have not been successful. The closure report is included in Attachment C.

**Current water table potentiometric map:** Please see Attachment D.

**Current product thickness map for the refinery:** The only area with free product is the area around Recovery Wells RW 5 and 6. The product thickness has varied from zero to approximately three feet. As noted above, when free product is found in these wells, they are bailed until no free product is visually detected. The formation in this area is very "tight" and not enough water/product is produced to sustain a pump and treat system.

**Closure Procedure for Wells:** Please see letter from Bill Kingsley of Precision Engineering in Attachment E.

**Tank Inspections, Modifications and Repairs:** Please see Attachment F for a list of Tanks and their contents. Also included is a list of tanks that have been inspected in the last 3 to 4 years.

I apologize for the time it took for Giant to reply to your request for additional information. Please contact me at (505) 722-0227 if you have questions or comments regarding the information in this report.

Sincerely,



Dorinda Mancini  
Environmental Manager, Ciniza Refinery

Cc: Denny Foust, OCD, Aztec Office  
Dave Pavlich, Sup't., Environmental Dept., Giant  
Steve Morris, Environmental Specialist, Ciniza

ARCC 2000

***GIANT***

**INDUSTRIES, INC.**

Comprehensive  
Facility Investigation  
Work Plan

Ciniza Refinery  
Discharge Plan  
GW – 32

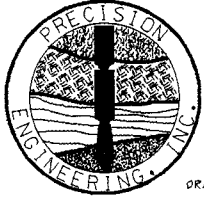
April 2000

# ATTACHMENT

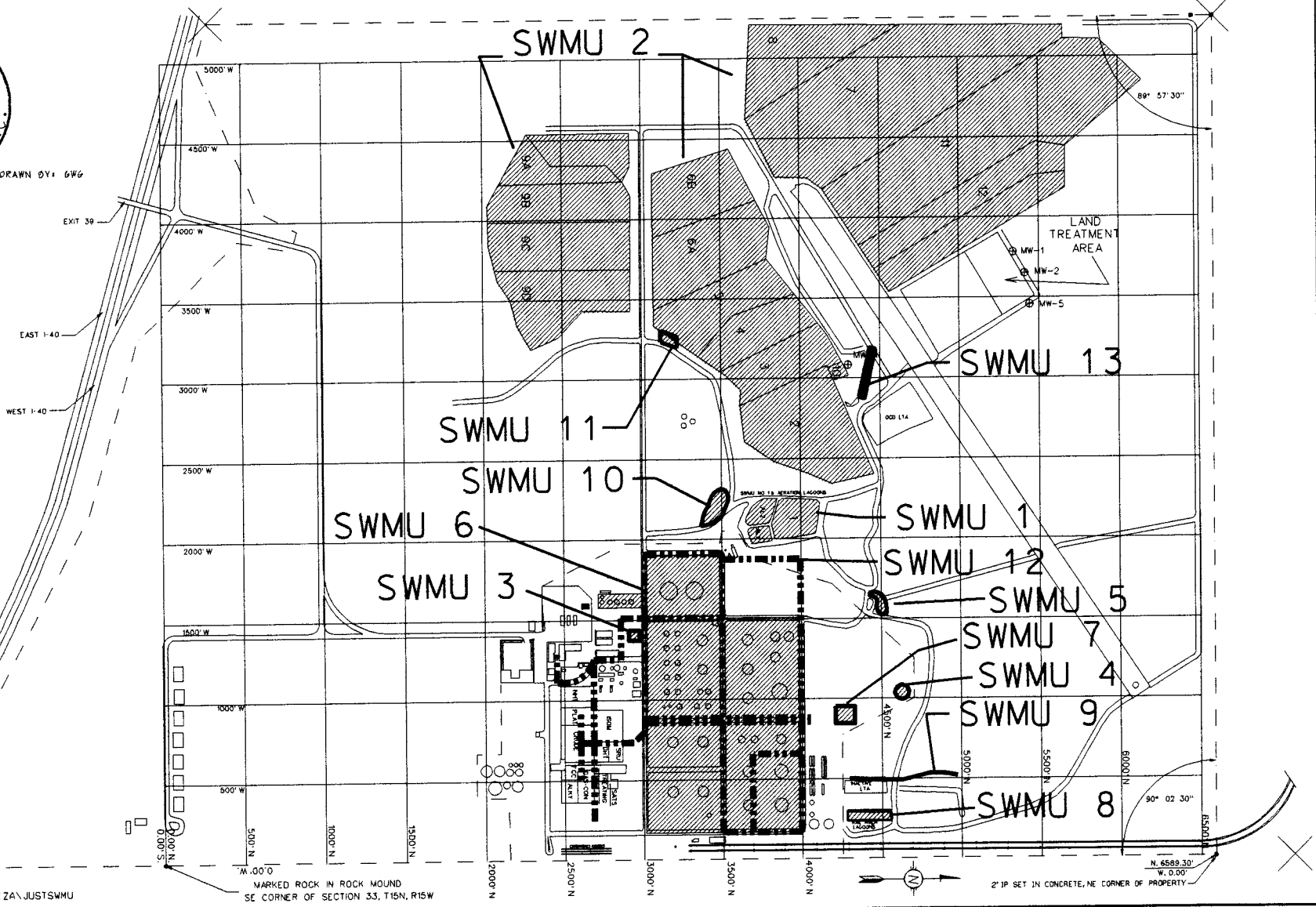
# A



# CINIZA REFINERY SWMU MAP



DRAWN BY: GWG



D:\WINN32APP\INGR\INSITU\CINIZA\JUSTSWMU

MARKED ROCK IN ROCK MOUND  
SE CORNER OF SECTION 33, T15N, R15W

N. 6589.30'  
W. 0.00'  
2" IP SET IN CONCRETE, NE CORNER OF PROPERTY

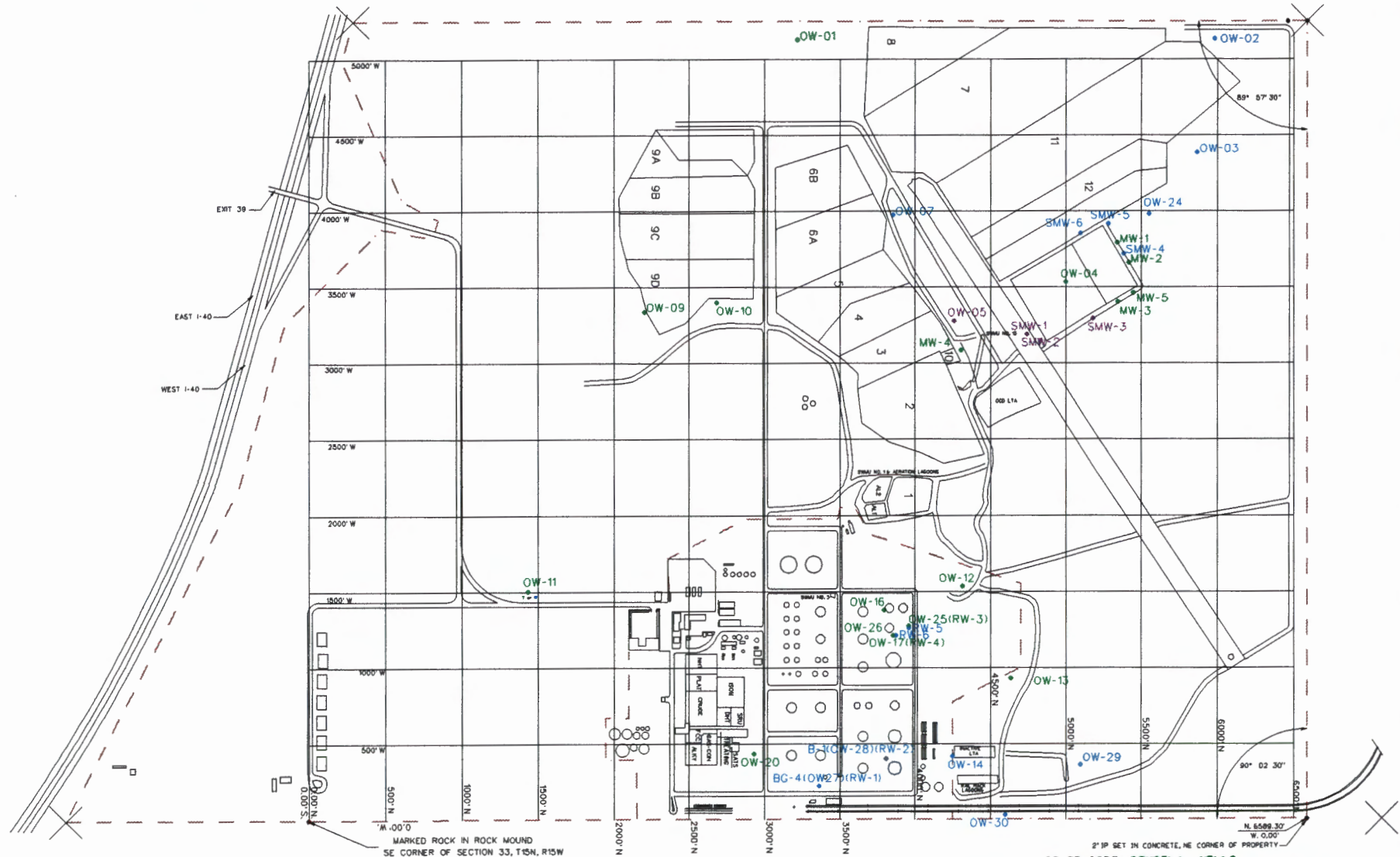
# ATTACHMENT

# B



# CINIZA REFINERY

## LOCATIONS OF WELLS



COLOR CODE: **SONSOLA WELLS**  
**CHINLE/ALLUVIUM INTERFACE WELLS**  
**UPPER SAND WELLS**  
**ALL OTHER EXPLORATORY BORINGS**

