



ENTERED

NEW MEXICO
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 30, 2008

Mr. Ed Riege
Environmental Superintendent
Western Refining Gallup Refinery
Route 3, Box 7
Gallup, New Mexico 87301

**RE: COMMENTS ON THE WESTERN REFINING SOUTHWEST, INC.
RESPONSE TO NMED'S APPROVAL WITH DIRECTION
SUMMARY OF DRILLING AND SAMPLING ACTIVITIES
WESTERN REFINING SOUTHWEST, INC., GALLUP REFINERY
NMED ID # NMD000333211
HWB-GRCC-08-002**

Dear Mr. Riege:

The New Mexico Environment Department (NMED) has received Western Refining Southwest, Inc., Gallup Refinery's (Permittee) *Response to Approval with Direction Summary of Drilling and Sampling Activities* letter dated May 27, 2008. NMED has the following comments.

Comment 1

Comment 2 of Western's response letter "[a] composite sample of soils was taken from all the drums containing soil cuttings and analyzed for Total Petroleum hydrocarbons using EPA Method 8015B (Gas/Diesel) and Toxicity Characteristic Leachate Procedure (TCLP) tests for RCRA 8 metals, Volatile Organic Aromatics (VOA), and Semi-VOA, as well as reactivity, corrosivity, and ignitability tests."

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In the future, the Permittee must not collect composite samples when analyzing for light hydrocarbons (i.e., gasoline range organics (GRO) and volatile organic compounds (VOCs)). When sampling for hydrocarbons, NMED requires that discrete samples be collected. No response necessary.

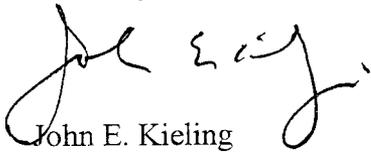
Comment 2

Comment 4 of Western's response letter states "[f]uture sampling will occur in KA-3R, and well KA-3 has been closed and is not proposed to be a part of future sampling efforts (as agreed by NMED)."

NMED would like to clarify that monitoring well KA-3 is neither closed nor abandoned, but sampling is not currently required at this well. This well may prove to be useful in the future and NMED may require sampling or monitoring at a later point in time. No response necessary.

If you have any questions regarding this letter please call Hope Monzeglio of my staff at (505) 476-6045.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
C. Frischkorn, NMED HWB
H. Monzeglio, NMED HWB
W. Price, OCD
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B. Powell, OCD Aztec Office
G. Ragen, Western Gallup
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