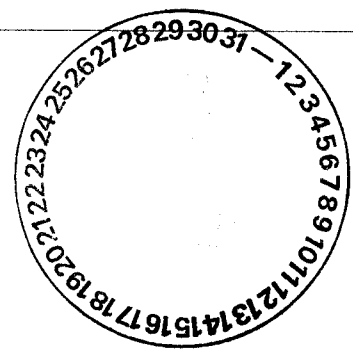


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June 30, 2008

Mr. Carl Chavez  
Oil Conservation Division  
Environmental Bureau  
1220 S. St. Francis Dr.  
Santa Fe, NM 87505

Re: OCD Discharge Permit GW-032 Condition 9

Dear Mr. Chavez:

This letter is in response to your letter of March 12, 2008 and follow-up to our meeting held in Santa Fe on May 15. Western Refining Gallup Refinery summarizes the alternative to OCD Permit Condition 9, Above Ground Tanks Impermeable Secondary Containment Requirement that was discussed during the May meeting:

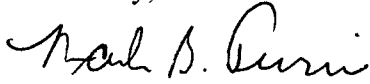
1. Install an automatic tank gauging system in all of its large (> 10,000 gallons) liquid storage tanks in the tank farm. The gauges will be installed initially in the highest priority liquid storage tanks and all new large tanks.
2. Install secondary bottoms with leak detection on tanks with significant floor problems found during the API 653 inspections scheduled for every 10 years and all new tanks. At least 10 percent of the tanks will be inspected each year. The anticipated schedule can be found in the attached tank list. A thick HDPE or FRP liner is laid over the failed steel tank bottom and fusion sealed along the side of the tank. Sand is spread and compacted over the liner with a leak detection network of perforated piping constructed on the sand and then covered with additional sand. A new steel floor is then installed on top of the sand. Please note the following tanks have recently had secondary bottoms with leak detection installed, T-225, T-226, T-577 and T-115.
3. Compact soil in earthen secondary containments at the time of tank inspection and repair.
4. Line the earthen secondary containments of the smaller sized storage tanks less than 10,000 gallons.

Attached is an inventory of all the refinery tanks as required by Item 1) in the OCD letter dated March 12, 2008. This list includes tank contents, capacity, dimensions, next external inspection date and the next internal inspection date (this is also the date where the tank will be considered for a secondary bottom with leak detection) and floor style. Please note on tank inspection dates, Western Refining

reserves the right to switch tanks due to logistics as long as 10 percent of tank inspections are conducted each year.

Your review and approval of this submittal are appreciated. Please contact Ed Riege at (505) 722-0217 if you have any comments or questions regarding this submittal.

Sincerely,



Mark B. Turri  
General Manager

C: Ms. Hope Monzeglio  
Ed Riege  
Don Riley  
Guarav Rajen



## GALLUP REFINERY STORAGE TANK INSPECTION CHART

	TANK NUMBER	YEAR BUILT	APPROX. CAPACITY (BBLs)	TANK DIAMETER	TANK HEIGHT/ LENGTH	NORMAL PRODUCT	NEXT EXTERNAL INSP. DATE	NEXT INTERNAL INSP. DATE	FLOOR STYLE (ABG =Above ground)
Cnt									
1	MKT-TK-2	1965	4,000	30'-0"	32'-0"	UNLEADED PREMIUM	2008	2008	ABG-gravel
2	MKT-TK-4	1970	3,800	30'-5"	32'-0"	83.0 OCTANE	2008	2008	ABG-gravel
3	P-V19A	1957	668.7 ft <sup>3</sup>	30'	LTH-147'-5"	HYDROGEN	2008	2008	Bullet
4	P-V19B	1957	668.7 ft <sup>3</sup>	30'	LTH-147'-5"	HYDROGEN	2008	2008	Bullet
5	P-V19C	1957	668.7 ft <sup>3</sup>	30'	LTH-147'-5"	HYDROGEN	2008	2008	Bullet
6	TK-343	1957	5,000	33'-6"	32'-0"	ETHANOL	2008	2008	ABG-gravel
7	TK-446	1945	712	9'-2 3/4 "	LTH-53'-10"	OLEFINS/ISO BUTANE	2008	2008	Bullet
8	TK-447	1957	1,502	11'-9"	LTH-45'-0"	ISO-BUTANE	2008	2008	Bullet
9	TK-555	1974	2,142	11'-0"	LTH-69'-11"	ISO-BUTANE	2008	2008	Bullet
10	TK-556	1957	718	9'-2 3/4 "	LTH-53'-10"	PROPANE	2008	2008	Bullet
11	TK-560	1957	2,336	11'-9"	LTH-69'-11"	BUTANE	2008	2008	Bullet
12	TK-563	1986	20,000	60'-0"	46'-6"	NAT. GAS.	2008	2008	ELLIPSOID
13	TK-564	1957	5,000	30'-0"	40'-0"	NAT.GAS/ISOM.	2008	2008	HEMISPHERE
14	TK-575	1957	10,000	42'-6"	40'-0"	SWET JET-A/K1	2008	2008	ABG-gravel
15	MKT-TK-5	1963	1,800	25'-0"	24'-0"	ETHANOL	2009	2009	ABG-gravel
16	MKT-TK-7	1946	330	9'-0"	LTH-66'-0"	ISOMERATE	2009	2009	Bullet
17	TK-106	1957	5,000	33'-6"	32'-0"	TRANSMIX	2009	2009	ABG-gravel
18	TK-18570	NO DATA	NO DATA	8'-0"	6'-0"	NALCO 7359	2009	2009	ABG-concrete
19	TK-228	1957	5,000	33'-6"	32'-0"	K-1	2009	2009	ABG-gravel
20	TK-27	1979	5,000	33'-5"	32'-0"	SLOP OIL	2009	2009	ABG-concrete
21	TK-28	1979	5,000	33'-5"	32'-0"	SLOP OIL	2009	2009	ABG-concrete
22	TK-338	1964	25,000	67'-0"	40'-0"	SWEET NAPHTHA	2009	2009	ABG-gravel
23	TK-562	1986	20,000	60'-0"	46'-6"	ISOMERATE	2009	2009	ELLIPSOID
24	TK-573	1957	250	10'-0"	18'-0"	KEROSENE (N.I.S)	2009	2009	ABG-gravel
25	1001	NO DATA	NO DATA	5'-4"	18'-0"	DIESEL TANK	2010	2010	ABG-concrete
26	1002	NO DATA	NO DATA	5'-4"	18'-0"	GASOLINE TANK	2010	2010	ABG-concrete
27	1003	NO DATA	NO DATA	5'-9"	12'-3 1/2"	UNICHEM 7547	2010	2010	ABG-concrete
28	1004	NO DATA	NO DATA	7'-5"	14'-7 1/2"	DSL POURPT ADDIT.	2010	2010	ABG-concrete
29	Q-T2	1956	350 BBL	10'-0"	8'-0"	CAUSTIC	2010	2010	ABG-concrete
30	Q-T8	1963	226	11'-9"	11'-8"	CAUSTIC	2010	2010	ABG-concrete
31	TK-117	1983	250	10'-0"	17'-9"	DE-ICER (DEAD TK)	2010	2010	ABG-gravel
32	TK-157	2001	400	12'-0"	20'-0"	SLOP OIL	2010	2010	ABG-gravel
33	TK-235	1957	5,000	33'-6"	32'-0"	TRANSMIX	2010	2010	ABG-gravel
34	TK-337	1977	20,000	60'-0"	42'-0"	ETHANOL	2010	2010	ABG-gravel
35	Q-T3	NO DATA	NO DATA	20'-0"	12'-0"	CAUSTIC (N.I.S)	2011	2011	ABG-concrete
36	SWS-TK1	2006	NO DATA	15'-5"	30'-0"	SOUR WATER	2011	2011	ABG-concrete
37	TK-108	1957	5,000	33'-6"	32'-0"	ALKLATE	2011	2011	ABG-concrete
38	TK-342	1957	5,000	33'-6"	32'-0"	ETHANOL	2011	2011	ABG-gravel

Cnt	TANK NUMBER	YEAR BUILT	APPROX. CAPACITY (BBLs)	TANK DIAMETER	TANK HEIGHT/ LENGTH	NORMAL PRODUCT	NEXT EXTERNAL INSP. DATE	NEXT INTERNAL INSP. DATE	FLOOR STYLE (ABG =Above ground)
39	TK-344	1977	20,000	60'-0"	42'-0"	REFORMATE	2011	2011	ABG-gravel
40	TK-345	1977	20,000	60'-0"	42'-0"	REFORMATE/ETOH	2011	2011	ABG-gravel
41	TK-701	1963	37,000	88'-6"	33'-10"	FCC FEED	2011	2011	ABG-tar
42	TK-706	1963	10,000	47'-5"	32'-1"	FUEL OIL	2011	2011	ABG-tar
43	TK-707	1963	1,000	26'-6"	17'-7"	SLOP OIL	2011	2011	ABG-tar
44	TK-714	1969	30,000	73'-4"	40'-0"	FCC FEED	2011	2011	ABG-tar
45	TK-557	1957	718	9'-2 3/4 "	LTH-53'-10"	PROPANE	2012	2012	Bullet
46	TK-568	1998	2,000	25'-0"	24'-0"	AMMONIUM THIOSULFATE	2012	2012	ABG-gravel
47	TK-577	1957	10,000	42'-6"	40'-0"	DIESEL	2012	2012	ABG-gravel
48	TK-579	1957	20,000	60'-0"	40'-0"	DIESEL	2012	2012	ABG-gravel
49	TK-582	1957	25,000	67'-0"	40'-0"	UNLEADED PREMIUM	2012	2012	ABG-gravel
50	TK-709	1963	1,000	22'-6"	14'-9"	RESIDUE	2012	2012	ABG-tar
51	Z-71-TK-716	2006	NO DATA	15'-5"	30'-0"	AMMONIUM THIOSULFATE	2012	2012	ABG-concrete
52	Z-81-T10	1957	NO DATA	11'-0"	18'-0"	CAUSTIC	2012	2012	ABG-tar
53	Z-81-T15	NO DATA	UNKNOWN	5'-7.75'	18'-0"	DIESEL	2012	2012	ABG-concrete
54	Z-86-T2	2002	444,000 GW	44'-0"	40'-0"	WATER	2012	2012	ABG-concrete
55	TK-102	1991	80,000	110'-0"	48'-0"	CRUDE	2013	2013	ABG-tar
56	TK-107	1957	5,000	33'-6"	32'-0"	SLOP OIL	2013	2013	ABG-gravel
57	TK-232	1957	5,000	33'-6"	32'-0"	TRANSMIX	2013	2013	ABG-gravel
58	TK-571	1957	25,000	67'-0"	40'-0"	87.0 UNLD REG.	2013	2013	ABG-gravel
59	TK-581	1957	25,000	67'-0"	40'-0"	LCO	2013	2013	ABG-gravel
60	TK-702	1963	25,000	67'-0"	40'-5"	FCC FEED	2013	2013	ABG-gravel
61	TK-704	1963	10,000	47'-4"	32'-2"	FUEL OIL	2013	2013	ABG-tar
62	TK-708	1963	1,000	22'-6"	14'-11"	RESIDUE	2013	2013	ABG-tar
63	TK-912	NO DATA	NO DATA	8'-0"	21'-0"	GASOLINE ADDITIVE	2013	2013	ABG-concrete
64	Z-81-T1	1998	1,000	21'-3"	16'-0"	TREATED WATER	2013	2013	ABG-concrete
65	TK-227	1957	5,000	33'-6"	32'-0"	K-1	2009	2014	ABG-gravel
66	TK-231	1957	5,000	33'-6"	32'-0"	TRANSMIX	2009	2014	ABG-gravel
67	TK-561	1957	2,336	131.875'	LTH-133.4"	BUTANE	2009	2014	Bullet
68	TK-565	1957	5,000	30'-0"	40'-0"	ISOM/NAT GAS/TOL	2009	2014	HEMISPHERE
69	TK-570	1957	25,000	67'-0"	40'-0"	87.0 UNLD REG.	2009	2014	ABG-gravel
70	TK-572	1957	25,000	67'-0"	40'-0"	87.0 UNLD REG.	2009	2014	ABG-gravel
71	TK-574	1968	40,000	85'-0"	40'-0"	ST.RUN	2009	2014	ABG-gravel
72	TK-576	1968	40,000	85'-0"	40'-0"	PREMIUM BASE	2009	2014	ABG-gravel
73	TK-703	1963	25,000	67'-0"	39'-8"	RESIDUE/FCC FEED	2009	2014	ABG-tar
74	TK-705	1963	10,000	47'-4"	31'-1"	FUEL OIL	2009	2014	ABG-tar
75	MKT-TK-1	1965	3,000	30'-0"	24'-0"	DIESEL	2010	2015	ABG-gravel
76	MKT-TK-3	1965	4,000	30'-0"	32'-0"	87.0 OCTANE	2010	2015	ABG-gravel
77	TK-101	1957	80,000	110'-0"	48'-0"	CRUDE	2010	2015	ABG-concrete
78	TK-111	1957	5,000	33'-6"	32'-0"	DHT PRODUCT	2010	2015	ABG-gravel
79	TK-448	1957	1,502	11'-9"	LTH-45'-0"	ISO-BUTANE	2010	2015	Bullet
80	TK-554	1974	2,142	131.875"	LTH-133.4"	BUTANE/PROPANE	2010	2015	Bullet
81	TK-567	1969	20,000	60'-0"	40'-0"	83.0 UNLD. REG.	2010	2015	ABG-gravel
82	Z-71-V2	1987	NO DATA	94.4375"	LTH-52'-.25"	ANHYDROUS AMMONIA	2010	2015	Bullet
83	Z-81-T7	1998	920	20'-5"	15'-8"	BRINE WATER	2010	2015	ABG-concrete

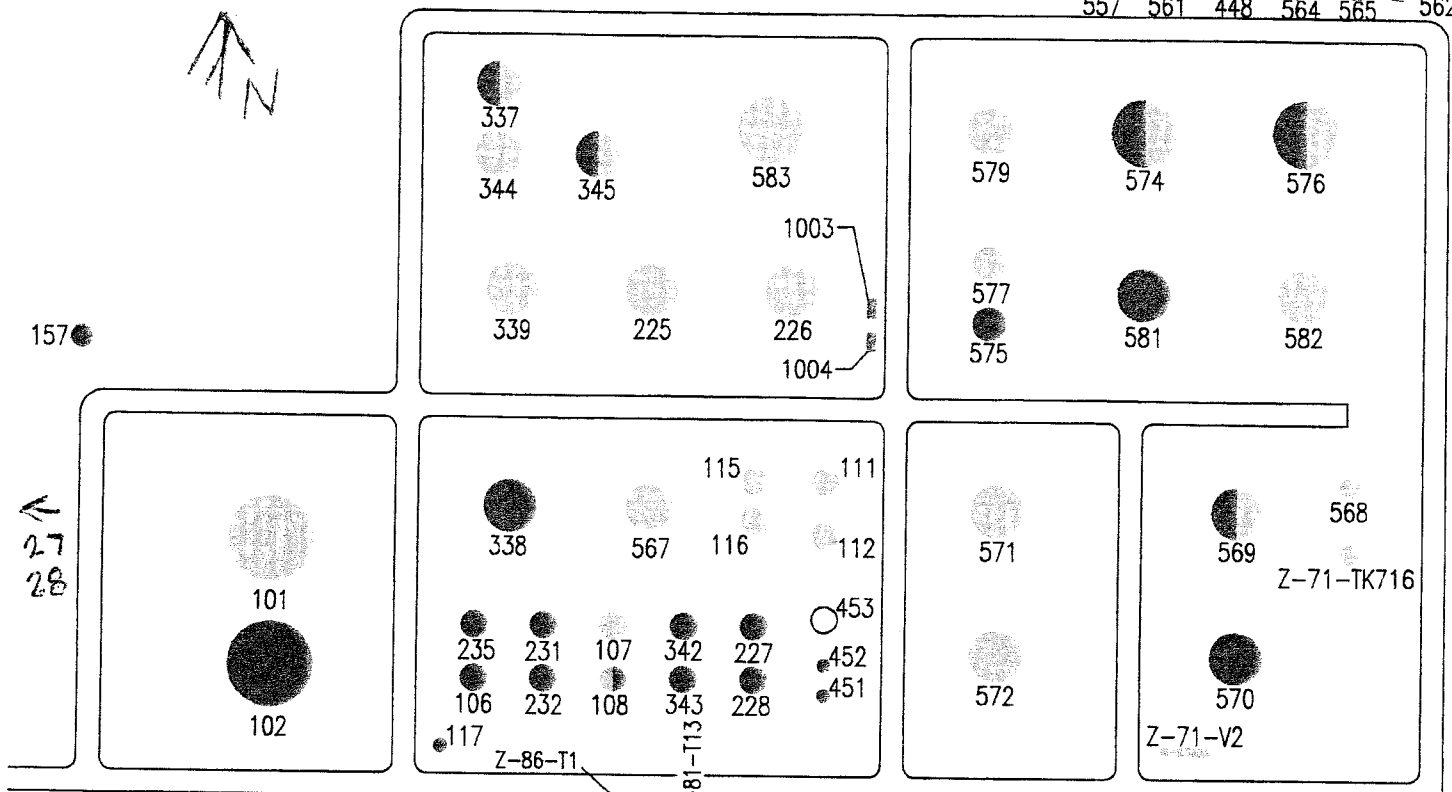
	TANK NUMBER	YEAR BUILT	APPROX. CAPACITY (BBLs)	TANK DIAMETER	TANK HEIGHT/ LENGTH	NORMAL PRODUCT	NEXT EXTERNAL INSP. DATE	NEXT INTERNAL INSP. DATE	FLOOR STYLE (ABG =Above ground)
Cnt									
84	Z-86-T1	1966	5,000	30'-0"	40'-0"	FIREWATER	2010	2015	ABG-concrete
85	MKT-TK-6	1963	1,800	28'-0"	27'-11"	EMPTY TANK	2011	2016	ABG-gravel
86	TK-112	1957	5,000	33'-6"	32'-0"	DHT PRODUCT	2011	2016	ABG-gravel
87	TK-115	1957	5,000	33'-6"	32'-0"	DHT PRODUCT (N.I.S)	2011	2016	ABG-gravel
88	TK-116	1957	5,000	33'-6"	32'-0"	DHT PRODUCT	2011	2016	ABG-concrete
89	TK-18571	NO DATA	NO DATA	8'-0"	6'-0"	NALCO 7359	2011	2016	ABG-concrete
90	TK-225	1957	25,000	67'0"	40'-0"	DISTILLATE	2011	2016	ABG-gravel
91	TK-226	1957	25,000	67'-0"	40'-0"	KEROSENE	2011	2016	ABG-gravel
92	TK-339	1957	25,000	67'-0"	40'-0"	SOUR NAPHTHA	2011	2016	ABG-gravel
93	TK-569	1957	25,000	67'-0"	40'-0"	83.O UNLD. REG.	2011	2016	ABG-gravel
94	Z-81-T6	1962	880	20'-6"	17'-6"	DOMESTIC WATER	2011	2016	ABG-tar
95	Q-T6	NO DATA	NO DATA	63'-5"	53'-0"	DRAIN HOLDING TK	2012	2017	ABG-concrete
96	TK-583	1996	55,000	100'-0"	40'-0"	DIESEL	2012	2017	ABG-concrete
97	TK-913	NO DATA	NO DATA	9'-11"	15'-0"	GASOLINE ADDITIVE	2012	2017	ABG-concrete
98	Z-81-T13	NO DATA	UNKNOWN	4'-0"	4'-0"	DIESEL	2012	2017	ABG-gravel
99	Z-81-T16	1953	UNKNOWN	5'-7.75'	15'-8"	STARTING AIR	2012	2017	ABG-concrete
100	Z-81-T17	NO DATA	NO DATA	8'9"	15'-0"	WATER SOFTENER (N.I.S)	2012	2017	ABG-gravel
101	Z-81-T5	1979	5,000	33'-5"	32'-0"	TREATED WATER	2012	2017	ABG-concrete
102	Z-81-T8	NO DATA	250	11'-0"	15'-0"	FUEL OIL (N.I.S)	2012	2017	ABG-concrete
103	Z-81-T9	NO DATA	UNKNOWN	6'-0"	12'-0"	DIESEL	2012	2017	ABG-ped
104	TK-451	1957	1,000	21'-3"	16'-0"	OUT OF SERVICE	n/a	n/a	ABG-gravel
105	TK-452	1957	1,000	21'-3"	16'-0"	OUT OF SERVICE	n/a	n/a	ABG-gravel
106	TK-453	1957	5,000	33'-6"	32'-0"	OUT OF SERVICE	n/a	n/a	ABG-gravel
107	TK-713	NO DATA	NO DATA	NO DATA	NO DATA	NOT IN SERVICE	n/a	n/a	ABG-tar

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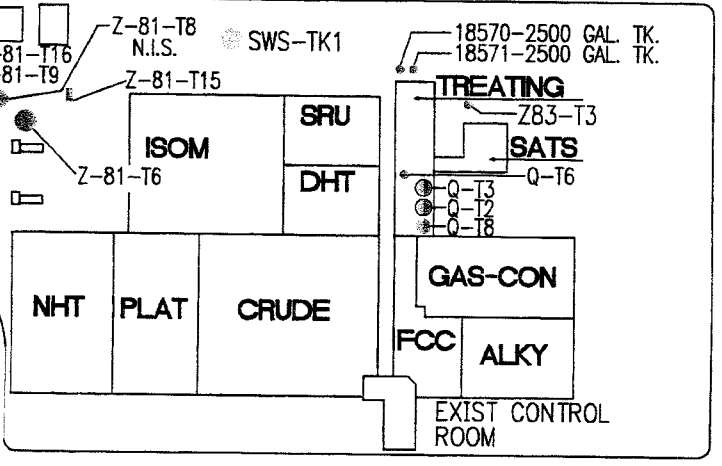
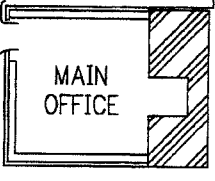
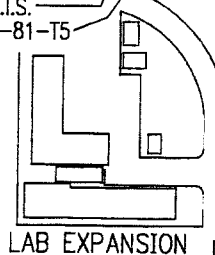


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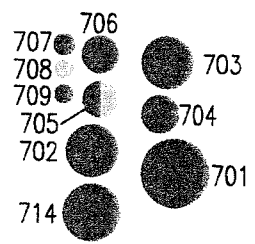
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912 - HITECH 6531  
 913 - NAP-96  
 DIESEL  
 GASOLINE



TRAINING TRAILER  
 INSPECTION TRAILER  
 FIRE & SAFETY BUILDING ●713 - N.I.S.



573-N.I.S.

P-V19A,B,C