



May 11, 2009

James Bearzi, Chief
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, BLDG 1
Santa Fe NM 87505

Re: Facility Wide Groundwater Monitoring Work Plan, Western Refining Company Southwest, Inc., EPA ID# NMD000333211, HWB-GRCC-09-001

Dear Mr. Bearzi:

The purpose of this letter is to submit our Facility Wide Groundwater Monitoring Plan as required in your letter dated February 9, 2009.

Many thanks to Ms. Hope Monzeglio of your staff, who was kind enough to share her thoughts, give us direction and share a similar plan developed for the Fort Wingate Army Depot.

If you have any questions, or if we can be of further service to you, please do not hesitate to call Dr. Gaurav Rajen at (505) 722-0227, or myself at (505) 722-0217.

Sincerely,



Ed Riege
Environmental Manager

Cc: Hope Monzeglio, HWB/NMED
Mark Turri, Western Refining
Ann Allen, Western Refining
Gaurav Rajen, Western Refining

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Facility-wide Groundwater Monitoring Plan: Gallup Refinery

**Western Refining
Gallup, New Mexico**

May 2009

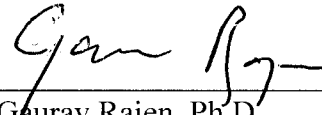


**Facility-wide Groundwater Monitoring Plan
Gallup Refinery**

**Western Refining
Gallup, New Mexico**

May 2009

Prepared by:



Gaurav Rajen, Ph.D.
Environmental Engineer

Reviewed by:



Ed Riege, M.P.H.
Environmental Manager

Executive Summary

This Site-Wide Groundwater Monitoring Plan (Plan) has been prepared in response to requirements stated in a letter from the New Mexico Environment Department's Hazardous Waste Bureau dated February 9, 2009 (see Appendix A.)

This Plan has been prepared to collect data that will be used to characterize the nature and extent of potential impacts to groundwater at the Gallup Refinery owned by Western Refining ("Gallup Refinery" or "Facility"). The monitoring plan is also designed to make the facility quickly aware of any levels of contaminants that exceed compliance standards.

This Plan divides the Facility into two areas for periodic monitoring: the East Side and the West Side. The East Side includes the Refinery Complex, recovery wells from which free products have been principally removed, but continue to be recovered in small quantities, and the North-East set of observation wells and monitoring wells. The West Side includes a cluster of wells in and around the wastewater treatment system, boundary wells, shallow monitoring wells in and around land treatment areas, and produced water wells. This plan also includes sampling requirements for aeration lagoons, influents, and evaporation ponds located in the West Side. Designated wells and sample points in these two areas will be monitored on an annual, semi-annual, quarterly, monthly, and weekly basis following the procedures presented in this Plan.

Gallup Refinery will periodically review facility-wide monitoring data, and assess the monitoring program presented in this Plan. Revisions to the Plan, as necessary, will then be presented for agency review and approval. These revisions may include, but not be limited to, a reduction or change in monitoring locations, monitoring frequency, and/or target chemicals to be analyzed.

We have created a monitoring Plan with quality assurance practices and controls as well as standard procedures for sampling, and a schedule of activities to monitor groundwater at select locations of the Gallup Refinery. The persons responsible for the implementation and oversight of this plan are:

Refinery Manager

- Mark Turri

Environmental Manager

- Ed Riege

Environmental Engineer

- Gaurav Rajen

Environmental Technicians

- Cheryl Johnson
- Alvin Dorsey

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LIST OF ACRONYMS

BMP	Best Management Practices
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
EPA	Environmental Protection Agency
GPM	Gallons per minute
HWB	Hazardous Waste Bureau
MTBE	Methyl Tert Butyl Ether
NAPIS	New American Petroleum Institute Separator
NMED	New Mexico Environment Department

OCD	Oil Conservation Division
PPE	Physical protective equipment
VOC	Volatile Organic Compounds
SVOC	Semi-volatile Organic Compounds
SWMU	Solid Waste Management Unit
SWPP	Storm Water Pollution Prevention program
WWTP	Wastewater treatment plant

1.0 Introduction

This Facility-Wide Groundwater Monitoring Plan (Plan) has been prepared for the implementation of a groundwater monitoring program at the Gallup Refinery to assess the nature and extent of potential impacts to groundwater from historic refinery operations, as well as become quickly aware of any levels of contaminants found in groundwater that exceed compliance standards.

The Plan follows the requirements of the February 9, 2009 letter issued by the New Mexico Environment Department's Hazardous Waste Bureau (NMED/HWB) and includes the following information (a copy of this letter is provided in Appendix A):

Executive Summary

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Background

- Historical site uses

- Potential receptors

- Type and characteristics of the waste and contaminants and any known and possible sources

- Summary of contaminant releases that could contribute to groundwater contamination

Site conditions

- Current site topography and location of natural and manmade structures

- Drainages

- Vegetation types

- Erosion features

- Current site uses

- Subsurface conditions

 - Soil types and associations

 - Stratigraphy

 - Presence and flow direction of groundwater

Scope of Activities

Sampling Locations and Procedures

Groundwater monitoring schedule

1.1. Facility Ownership and Operation

This Plan pertains to the Western Refining Southwest Inc. Gallup Refinery located at Exit 39 on Interstate I-40. This refinery is known as the Gallup Refinery and is located at Jamestown New Mexico, approximately 17 miles east of Gallup. Figure 1 shows the regional location of the Gallup Refinery.

The owner is:

Western Refining
123 W. Mills Avenue

(parent corporation)