



September 14, 2011

VIA EMAIL AND CERTIFIED MAIL No. 7010 0290 0002 7735 3776

Mr. John E. Kieling, Acting Chief
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Joel Dougherty (6EN-HE)
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RE: REQUEST FOR APPROVAL OF PROCESS DESIGN CHANGES PROCESS DESIGN
REPORT (Approved May 24, 2010)
WESTERN REFINING SOUTHWEST, INC., GALLUP REFINERY
EPA ID #NMD000333211

Dear Mr. Kieling:

Western remains on-track for constructing the upgraded wastewater treatment system that complies with the terms of the CAFO. In any construction project of this magnitude, design improvements, real-world construction solutions will result in some changes from the original design as the project progresses.

Since the CAFO incorporates the NMED-approved design, Western thinks it is appropriate to seek NMED's approval of a couple changes to the original process design plan. These changes addressed below have either already been discussed with NMED or simply reflect actual operations of the new units. They do not change or affect deadlines under the CAFO Milestones:

- A new double lined aerated pond with leak detection, STP-1 has been added. NMED is aware of this addition and recently reviewed the process design along with the Oil Conservation Division (OCD). OCD approval of the design and construction plans with conditions was received on August 25, 2011. The closure

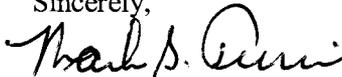
of lagoons AL-1, AL-2 and pond EP-1 creates the need for a new pond to provide aeration for the sanitary flow it receives along with process water from the MPPE.

- The function of Tanks 27 and 28 has changed from the original design plan. Tanks 27 and 28 will no longer receive off-spec wastewater from downstream of the API separator. Even though these tanks are not going to receive off-spec wastewater they were modified to meet elements of Subpart J including double bottom with leak detection and internal floating roofs. The tanks will be surrounded by an earthen secondary containment. The diversion of off-specification wastewater will be accomplished by: (i) stopping the flow to the API separator and holding the wastewater in Tanks 35, 27 and/or 28, which would normally flow to the API separator, ; and (ii) routing the off-spec wastewater to the DGF Feed Tank which will be built to RCRA Subpart J standards. Note that Tank 35 even in earlier versions of the plan was not planned to receive off-spec wastewater downstream of the API. These changes provide a larger pumping reservoir for the pumps coming off of the API which will help to equalize flow through the DAF/MPPE units in the new WWTU and provide more consistent suction head to these pumps. It will also eliminate the use of ~2000 feet of 6 inch piping to recycle any off-spec water by not having to route it all the way down and back up the hill thus reducing power consumption and reducing the risk of a spill, a win-win for all parties. The DGF Feed Tank is sized to accommodate the required material in the WWTU itself that might need to be drained to facilitate maintenance access to equipment.

I certify that the information contained in or accompanying this submission is true, accurate and complete. As to those identified portions of this submission for which I cannot personally verify the truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting upon my direct instructions, made the verification, that this information is true, accurate, and complete.

Thank you for your review of these changes. We would appreciate a response indicating NMED's confirmation that these construction changes are deemed incorporated into the process design plan approved (May 24, 2010) under the CAFO. Please feel free to contact Ed Riege at 505-722-0217 with any questions.

Sincerely,



Mark B. Turri
Refinery Manager

cc: Kristen Van Horn NMED HWB
Carl Chavez OCD
Ann Allen Western Refining
Ed Riege Western Refining
Don Riley Western Refining
Frank Keys Western Refining