

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505


State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Western Gally
WWTs
Tank 35 Overflows
Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action (Tank (T-35) OVERFLOWS from 8-02-13 and 8-04-13 COMBINED EVENTS)

OPERATOR

Initial Report Final Report

Name of Company: WESTERN REFINING		Contact: Beck Larsen
Address: I-40 / EXIT 39, JAMESTOWN, NM 87347		Telephone No. (505) 722-0258
Facility Name: WESTERN REFINING (GALLUP REFINERY)		Facility Type: Petroleum Refinery
Surface Owner	Mineral Owner	API No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	28	15 N	15 W					MCKINLEY

Latitude 35° 029' 024" Longitude 108° 024' 024"

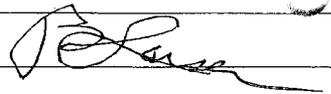
NATURE OF RELEASE

Type of Release: T-35 Overflows (8/2 and 8/4/13 events)	Volume of Release 19 bbls (oil) (8/2/13) 23 bbls (oil) (8/4/13)	Volume Recovered: In progress In progress from 8/2/13
Source of Release: Unknown; Pending Investigation	Date and Hour of Occurrence 08/02/13 @ 1635 hrs 08/04/13 @ 1655 hrs	Date and Hour of Discovery 08/02/13 @ 1635 hrs 08/04/13 @ 1655 hrs
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? 8/02/13 Event- (HWB-R. Horowitz (msg), K Vanhorn (msg)); (OCD -C Chavez (msg), B Powell (msg)) 8/04/13 Event- (HWB-R. Horowitz (msg), K Vanhorn (msg)); (OCD -C Chavez (msg), B Powell)	
By Whom? Beck Larsen	Date and Hour: 8/02/13 Event-Notify on 8/03/13- (HWB-R. Horowitz (msg; 1400), K Vanhorn (msg; 1403)); (OCD -C Chavez (msg; 1352), B Powell; 1356) 8/04/13 Event- Notify on 8/04/13- (HWB-R. Horowitz (msg; 2105), K Vanhorn (msg; 2109)); (OCD -C Chavez (msg; 2103), B Powell; 2100)	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	
If a Watercourse was Impacted, Describe Fully.* N/A		

Describe Cause of Problem and Remedial Action Taken.*
On August 2, 2013 at about 1500 hrs a heavy rain storm passed over the refinery. In preparation to this event, charge rates and water was reduced going to T-35. At about 1635 hrs, T-35 began to overflow. Two passed over the area for a total rainfall of 0.6 inches. Vacuum trucks were already onsite to remove as much water as possible in anticipation of this event. Cleanup immediately began to remove oily wastewater. Agency personnel were notified on 8/3/2013 of the 8/2/13 event. On August 4, 2013 at about 1500 another rain event occurred causing T-35 to overflow once again at 1655 hrs. The total rain for this event was about 1.07 inches. Vacuum trucks continued to remove as much water as possible from dike area and T-35. A foam blanket was laid down on area due to LEL issues only as a precaution. Agency personnel were also notified on 8/4/2013 of the 8/4/13 event that occurred. These two events have been treated as one event due to overlapping occurrences and cleanup efforts. All oily wastewater from Tank (T-35) overflows was contained within the containment dike.

Describe Area Affected and Cleanup Action Taken.*
All oily wastewater from T-35 overflow was contained within the dike area. Vacuum trucks are in process of removing oily wastewater from dike containment area.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 		<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Beck Larsen:		Approved by Environmental Specialist:	
Title: Environmental Engineer		Approval Date:	Expiration Date:
E-mail Address: Thurman.larsen@wnr.com		Conditions of Approval:	Attached <input type="checkbox"/>
Date: 8/6/2013 Phone (505) 722-0258			

* Attach Additional Sheets If Necessary

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February 7, 2012

New Mexico Environmental Department
Hazardous Waste Bureau (HWB)
1301 Siler Road, Building B
Santa Fe, NM 87507
Attn: Ms Kristen Van Horn

New Mexico Energy, Minerals, and Natural Resources
Oil Conservation Division (OCD)
1220 South St. Francis Drive
Santa Fe, NM 87505
Attn: Mr. Carl J. Chavez

Re: Tank (T-35) Overflow Cleanup and Final (C-141) Submittal

Dear Ms Van Horn and Mr. Chavez:

Western Refining Company - Gallup Refinery is submitting the following report as a final to the Tank 35 (T-35) cleanup of a release that occurred on October 2, 2011. Western Refining (Gallup Refinery) previously submitted an initial C-141 along with the Confirmation Soil Sampling Plan as presented in the letter that was addressed to the Agency of November 10, 2011. The initial plan addresses the soil excavation and removal of contamination from the Tank 35 (T-35) area. Due to the area and processes involved, it was decided to manage this excavated soil as a Hazardous Waste and to dispose of this material off-site to an approved TSD Facility.

Approximately one inch of visually stained soil was first removed prior to conducting the initial Confirmation cleanup and sampling assessment requirements. A third party Environmental Consulting firm (Trihydro Corporation) was came out on October 28, 2011 in order to perform visual assessment and extent of the contaminated area. As a result of this initial assessment, Trihydro identified five distinct locations, (T-35-1, T-35-2, T-35-3, T-35-4, and T-35-5), as shown in the map from the November 10, 2011 (Confirmation Sampling Plan) report. Each of the five locations that were identified were also staked out for sampling.

In December 2011, Trihydro was called back to perform the initial sampling in accordance with the Confirmation Sampling Plan. On December 15, 2011, Trihydro Consultants began sampling at these five locations. The laboratory analysis was conducted by Hall Environmental Laboratory using Method 8260 (VOC, Volatile Organic Compounds), Method 8270 (Semi volatile Organic compounds), Method 8015B (Diesel and Gasoline Range Organics (DRO/GRO)), and RCRA Metals. One sample was taken at each of the five locations. The analytical report was received on December 27, 2011. Upon receipt of the analytical data on December 27, it was noticed that all of the parameters were Total Values. Therefore, Western requested additional testing for TCLP for Methods 8260, 8270, and RCRA 8 Metals. Also, Western requested that an RCI to be conducted. The final Analysis (Order #: 1112721) for the initial sampling is enclosed. The results of this analysis indicated a high value of TPH in areas T-35-1 and T-35-5, in particular, DRO and MRO. Based on this evaluation, additional remediation would be required in these two areas. Based on the analysis contractors were give the authorization to replace the excavated soil from T-35-2, T-35-3, and T-35-4 areas with clean soil and gravel.

Contract personnel were given permission to conduct additional remediation in the two areas of question, i.e. around Tank 35 (T-35-1 and T-35-5). Contractors were to remove about 1 to 2 inches of additional soil in area T-35-1 and about 2 to 3 inches of additional soil in area T-35-5. Once contractors finished the remediation from these two areas, additional sampling was

conducted using the same criteria as performed previously. On January 5, additional sampling was conducted in these two locations (T-35-1 and T-35-5) was sent to Hall Laboratory for analysis. The final Analysis (Order #: 1201183) for the additional confirmation sampling was received on January 13, 2012. Again upon receipt of the analysis as mentioned above, Western requested additional analysis on January 16, 2012. A modified report that is attached was received with the additional testing in the final report of January 24, 2012. Based on the analysis contractors were give the authorization to replace the excavated soil from T-35-1 and T-35-5 areas with clean soil and gravel.

If you should require additional information, please feel free to contact me at (505) 722-0258.

Sincerely,



Beck Larsen, CHMM/REM
Western Refining-Southwest (Gallup Refinery)
Office: (505) 722-0258
Cell: (505) 862-1749

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1625 N. French Dr., Hobbs, NM 88240
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Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company: Western Refining	Contact: Beck Larsen
Address I-40 / Exit 39, Jamestown, NM 87347	Telephone No: (505) 722-0258
Facility Name: Western Refining (Gallup)	Facility Type: Petroleum Refinery
Surface Owner:	Mineral Owner:
	Lease No.

LOCATION OF RELEASE

Unit Letter	Section 28	Township 15 N	Range 15 W	Feet from the	North/South Line	Feet from the	East/West Line	County McKinley
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Latitude 35° 29' 022" Longitude 108° 24' 024"

NATURE OF RELEASE

Type of Release 13 bbls (oil) / 1240 bbls (process and stormwater mixture)	Volume of Release Estimated 13 bbls (oil)	Volume Recovered 1240 bbls (stormwater and oily process water)/ 13 bbls (oil)
Source of Release: Tank (T-35) Overflow	Date and Hour of Occurrence 10/02/2011; 1540 hrs (3:40 PM)	Date and Hour of Discovery 10/02/2011; 1540 hrs (3:40 PM)
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Ruth Horowitz, NMED HWB (telephone call); Kristen Van Horn, NMED HWB (telephone call) Brandon Powell, NMED HWB (telephone call) Carl J Chavez, OCD (telephone call)	
By Whom? Loretta Morgan	Date and Hour 10/3/201; 1323 hrs (1:23 PM) (approximately)	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.* N/A

Describe Cause of Problem and Remedial Action Taken.* The cause was previously described in the C-141 (Initial Report) of 10/26/2011. The initial cleanup around T-35 began via vacuum truck that removed the stormwater and oily process water surrounding T-35. Once the water was removed and T-35 area was dry to allow access of heavy equipment, soil remedial activity operations commenced. Initially 1 inch of contaminated soil was removed around T-35.

Describe Area Affected and Cleanup Action Taken.*
Initial soil samples were collected on 12/15/2011 according to diagram. Sample results indicated the additional samples were required in areas T-35-1 and T-35-5 (according to diagram). Contractors began remediation activities in areas T-35-1 and T-35-5. Approximately 1 to 3 inches of additional soil were removed in areas 1 and 5 at T-35. Confirmation sampling was again conducted on 1/5/2012. Sample results indicated that areas were clean and could be covered with clean fill dirt and gravel. All contaminated soil is being shipped off-site as Hazardous Waste to an approved TSD Facility in accordance to all applicable regulations.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature: 	OIL CONSERVATION DIVISION	
Printed Name: Beck Larsen	Approved by District Supervisor:	
Title: Environmental Engineer	Approval Date:	Expiration Date:
E-mail Address: Thurman.larsen@wnr.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 2/07/2012 Phone: (505) 722-0258		

* Attach Additional Sheets If Necessary

From: Riege, Ed [<mailto:Ed.Riege@wnr.com>]
Sent: Monday, August 05, 2013 2:38 PM
To: VanHorn, Kristen, NMENV
Subject: RE: Tank 35 overflows

Kristen,
Please see response below.

Thanks,
Ed

From: VanHorn, Kristen, NMENV [<mailto:Kristen.VanHorn@state.nm.us>]
Sent: Monday, August 05, 2013 9:50 AM
To: Riege, Ed
Cc: Larsen, Thurman; Dhawan, Neelam, NMENV; Cobrain, Dave, NMENV
Subject: Tank 35 overflows

Ed,
I had two voicemails from Western Refining about overflows from Tank 35 and I have a couple of questions.

Is the refinery using Tanks 27 and 28 and the Baker Tanks NMED observed near Tanks 27 and 28? Yes, the refinery is using all three.

How much water is being stored in Tank 35? 22,950 bbl Why were vacuum trucks being used to remove water from Tank 35 rather than use the surge tanks? The surge tanks are near capacity so water was being transferred by truck to additional tanks. How much water is being stored in the surge tanks? Close to the 5,000 bbl capacity each.

Is the WWTS able to handle enough waste water to keep the tanks at reasonable levels (or levels reported in the past – 25-50% full)? At the beginning of July before the rains T-35 was approximately 60% full. The refinery has brought in carbon beds to help run an extra 90 gpm of wastewater. A MPPE pilot plant has also been brought in which should run an additional 30 gpm. The pilot plant will allow Gallup to sample the MPPE media to see what is causing the MPPE plugging issues.

Thanks,
Kristen

Kristen Van Horn
NMED Hazardous Waste Bureau
2905 Rodeo Park Drive East
Building 1
Santa Fe, NM 87505
Phone: 505-476-6046
Email: Kristen.VanHorn@state.nm.us

VanHorn, Kristen, NMENV

From: Riege, Ed <Ed.Riege@wnr.com>
Sent: Wednesday, August 07, 2013 4:20 PM
To: VanHorn, Kristen, NMENV
Subject: WWTP Questions

Kristen,
Please see response to your questions below.

Thanks,
Ed

From: VanHorn, Kristen, NMENV [<mailto:Kristen.VanHorn@state.nm.us>]
Sent: Monday, August 05, 2013 4:27 PM
To: Riege, Ed
Cc: Kieling, John, NMENV; Cobrain, Dave, NMENV; Dhawan, Neelam, NMENV
Subject: RE: Tank 35 overflows

Ed,
Thanks for your response.

I have a few more questions for you:

Is the refinery still processing process waste water through the waste water treatment system? Yes Or is the process waste water being held in the tanks along with storm sewer waste water? All wastewater flows through the equalization/holding tanks (currently T-35). The equalization/holding tanks equalize the variability in both flow rate and quality of waste water composition to allow downstream equipment to operate more smoothly and, as needed, to stop flow of wastewater to the API separator to perform maintenance or address operating difficulties at equipment downstream of these tanks.

How often does waste water have to be routed to the tanks to achieve discharge limits at STP-1? See response to next question. Water is not routed back from the WWTP to the equalization/holding tanks. Water is stored in these tanks as needed to perform maintenance or address operating difficulties at equipment downstream of these tanks, for example when the flow is restricted in the MPPE columns.

How long is the water held in the tanks (both the surge and the added Baker tanks)? Throughout most of 2013 waste water turnover has occurred in T-35, T-27 and T-28. The longest water has been stored in the Baker tanks is approximately 5 months.

Is there a second contingency plan in place in case the contingency of adding the Baker tanks to the system ends up not providing enough storage capacity? A contingency plan has been implemented by bringing in carbon beds to increase the wastewater treated, which will help with emptying the baker tanks.

What gpm flow is the WWTS running on average? The current average is 200 gpm with the addition of the carbon beds.

Thank you for your time,
Kristen