



NEW MEXICO  
ENVIRONMENT DEPARTMENT



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Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

May 12, 2015

Mr. Ed Riege  
Environmental Manager  
Western Refining, Southwest Inc., Gallup Refinery  
92 Giant Crossing Road  
Gallup, New Mexico 87301

**RE: REQUIREMENT  
SUBMITTAL OF WORK PLAN  
HYDROCARBON DISCOVERY NORTH DRAINAGE DITCH  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-MISC**

Dear Mr. Riege:

Western Refining Southwest Inc., Gallup Refinery (Permittee) discovered hydrocarbons in a drainage ditch in the northern portion of the refinery property and notified the New Mexico Environment Department (NMED) in a letter dated April 22, 2015. In the letter, the Permittee stated that there are no documented waste management operations in this area.

Surface water samples collected from standing water in the drainage ditch were analyzed and concentrations of benzene, toluene, ethyl benzene and xylenes (BTEX) were detected as well as methyl tert-butyl ether (MTBE), gasoline-range organics (GRO) and diesel-range organics (DRO). The level of benzene in the sampling results (ranging from 5200 to 5400 ug/L) suggests that the source may be nearby; however, the refinery has not used MTBE since 2006.

The Permittee must provide a Work Plan for NMED's review. The Permittee must provide information regarding any tanks located upgradient from the hydrocarbon discovery that could be potential sources of the release. Additionally, please provide information regarding tank

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contents and the tank inspection schedule for any potential upgradient tank sources. Finally, also provide additional information regarding the drainage ditch (e.g., depth of ditch, direction of flow, and drainage outlets).

In the letter, the Permittee proposed to install soil borings in the vicinity of the ditch "with the potential to collect groundwater samples." In the Work Plan, the Permittee must propose to collect soil samples as well as groundwater samples for laboratory analysis of GRO and DRO-extended, RCRA 8 metals (totals), volatile organic compounds (VOCs) including MTBE, and semi-volatile organic compound (SVOCs). The Permittee must provide a scaled figure depicting the location of the proposed soil borings and include nearby groundwater monitoring wells. The Work Plan must include a description of the methods and procedures proposed to advance the soil borings, collect the soil and groundwater samples, the depth of soil samples, and any other relevant field data collection.

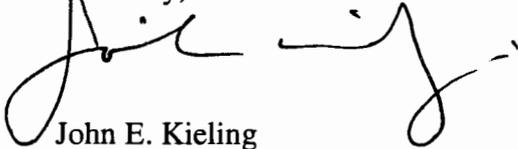
Depending on the results of the initial investigation, the Permittee may be required to conduct additional investigations to determine the source of the hydrocarbons and also may be required to conduct cleanup as part of corrective action.

The Permittee must submit a Work Plan for NMED review no later than **September 3, 2015**. The submittal must include two paper copies and an electronic copy in accordance with Permit Section II.C.7 (Submissions to the Environment Department).

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If you have questions regarding this letter, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kielling". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John E. Kielling  
Chief  
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB  
N. Dhawan, NMED HWB  
K. Van Horn, NMED HWB  
A. Hains, WRG  
C. Chavez, EMNRD OCD  
L. King, EPA

File: Reading File and WRG 2015 File  
WRG-MISC