Western Refining
GALLUP

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SEP 24 2015

September 21, 2015

Mr. John E. Kieling, Chief
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

RE: Approval with Modifications – Facility Wide Ground Water Monitoring Work Plan
2012 Updates; 2013 Updates; 2014 Updates for 2015.
Western Refining Southwest Inc., Gallup Refinery
EPA ID #NMD000333211
HWB-WRG-13-002
HWB-WRG-14-002
HWB-WRG-15-001

Dear Mr. Kieling:

Western Refining, Gallup Refinery has prepared the following responses to the comments listed regarding the above referenced matter dated July 24, 2015. All required revisions (red-line strike out) are included in the Revised Facility Wide Ground Water Monitoring Work Plan – 2014 Updates for 2015, which has been copied onto a CD disc. Hard copies of the revised sections only of the Work Plan are attached to this report.

Comment 1

The Permittee included a hard copy of the red-line strikeout version of the Work Plan, which highlighted some, but not all the changes to the Work Plan. Include a red-line strikeout version of Table 1 if changes are made to Table 1 each year. Additionally, in the future, there is no need to provide a paper copy of the red-line strikeout if an electronic copy is provided:

Response: *No Response Required.*

2012 Work Plan Comments
Comment 2

On Page 13 the Permittee states, "Method 8021B analysis is required for ground water detected in GWM-2 and GWM-3 and Western would like to change method 8021B analysis to Method 8260B + MTBE for a more detailed list of volatile organic carbons." This proposed change was incorporated into Table 1 as well. The Permittee also requests this change in Section 5.3.1 (Request for Modifications to the Sampling Plan). NMED hereby approves this proposed change and it must be incorporated into all future Work Plans. Please revise Table 1 as necessary.

Response: *Table 1 in Appendix D has been revised in the Revised 2014 Facility Wide Ground Water Monitoring Work Plan – 2014 Updates for 2015. (Attached)*

Comment 3

In Section 4.1.1(Well Gauging) the Permittee states, "[a]ll measurements will be made relative to the same datum for all wells." Each well casing should have been surveyed and a measuring point marked on the top of the casing, all measurements must be made from that surveyed point on the well casing for each individual well as noted in Work Plan Appendix B; Field Data Collection; paragraph two; "wells also have a permanent marked reference point on the well casing from which ground water levels and well depths are measured." In all future Work Plans, revise the sentence in Section 4.1.1 to accurately describe measurement points as described in Appendix B and ensure that information in the main text and appendices correspond.

Response: *Information from Appendix B, Field Data Collection, paragraph two has been incorporated into Section 4.1.1. (Revised section attached)*

Comment 4

In Section 5.3.1 (Request for Modifications to the Sampling Plan), the Permittee noted that monitoring well OAPIS-1 was included in the monitoring schedule and sampled on a quarterly basis for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), WQCC metals (totals and dissolved), gasoline-range organics (GRO), diesel-range organics (DRO) extended, and major cations and anions. The addition of OAPIS-1 is approved as well as the list of proposed laboratory analyses.

Response: *No response required.*

Comment 5

In Section 5.3.1 (Request for Modifications to the Sampling Plan), the Permittee notes that, [t]here is no more flow at these sample points in the outfalls except for the Pilot Effluent which continues to flow to EP-1." As long as the Pilot Effluent flow is now routed to STP-1 and the changes made to Table 1 are reflective of the changes to the waste water treatment system, the changes are approved.

Response: *No response required.*

2013 Work Plan Comments
Comment 6

On Page 13, the Permittee notes the hydrocarbon seep discovered in June 2013 and the 18 permanent monitoring wells that were installed to monitor the seep. In Section 5.3.1 (Request for Modifications to Sampling Plan) the Permittee stated that 18 permanent monitoring wells (MKTF-1 through 18) have been added. The Permittee proposes quarterly sampling for VOCs, SVOCs, WQCC metals (total and dissolved), GRO, DRO extended, and major cations and anions. The Permittee notes that samples would not be collected, if measureable separate phase hydrocarbon (SPH) was detected. The addition of the MKTF monitoring wells to the Work Plan is approved as well as the proposed analytical suites. All SPH in the ground water wells must be measured and the thickness reported in the Facility Wide Ground water Monitoring Reports.

Response: *No response required.*

Comment 7

The Permittee requests several other changes to the Work Plan in Section 5.3.1 (Request for Modifications to Sampling Plan):

a) The Permittee request to change the analyses for OW-1 and OW-10 to VOCs, major cations and anions, arsenic and uranium. The current requirements for OW-1 are: quarterly monitoring, collection of groundwater elevation data, water quality parameters, and a visual check for artesian conditions and sample for major cations, anions, VOCs, GRO, DRO extended and WQCD metals. The current requirements for OW-10 are: quarterly monitoring, ground water elevation data, water quality parameters and water level measurement of the Sonsela aquifer, analysis for major cations, anions, VOCs, GRO, DRO extended, and WQCC metals. For monitoring well OW-1, the Permittee must continue sampling for chromium, iron, manganese, arsenic and uranium as well as VOCs, GRO, DRO extended and WQCC Metals and major cations and anions. For monitoring well OW-10, the Permittee must continue sampling for methyl tert-butyl ether (MTBE), GRO, DRO-extended, uranium and arsenic as well as VOCs, and major cations and anions. The OW series of ground water monitoring wells are used for detection and compliance monitoring and it is necessary to continue to monitor for these constituents and any changes in groundwater conditions over time. The Permittee must also continue to collect ground water level measurements, and water quality parameters for both monitoring wells. Revise Table 1 as required.

b) The Permittee requests to reduce the analyses for ground water samples collected from groundwater monitoring wells BW-1A, BW-1B, BW-1C, BW-2A, BW-2B, BW-2C, BW-3A, BW-3B, BW-3C to RCRA metals (total and dissolved), and discontinue SVOCs, because the only analyte recently detected is bis-2-ethylhexylphthalate a possible laboratory contaminant. Currently BW-wells are analyzed for major cations, anions, VOCs, SVOCs, WQCC metals, ground water levels, and water quality parameters. The purpose of the BW-series wells is for boundary detection monitoring and to monitor potential contamination that may migrate off-site. The Permittee must therefore continue to sample and analyze for major

cations and anions, VOCs, WQCC metals, ground water level, and water quality parameters. The Permittee may discontinue sampling for SVOCs, but must add analysis for GRO and DRO-extended. Please revise Table 1 as necessary.

c) The Permittee requests that well OW-11 analyses be reduced to major cations and anions and WQCC metals (total and dissolved), stating that there have been no detections of VOCs or SVOCs except one hit of bis-2-ethylhexylphthalate (possible lab contaminant). The Permittee must continue to sample for major cations and anions, VOCs and WQCC metals. The OW-series of ground water monitoring wells are used for detection and compliance monitoring and it is necessary to continue to monitor for these constituents and any changes in ground water conditions over time. The Permittee may discontinue analysis for SVOCs. However, analyses must also include uranium as well as GRO and DRO-extended. Revise Table 1 as necessary.

d) The Permittee requests to reduce the analytical suites for wells OW-50 and OW-52 to VOCs and WQCC metals. Currently, the required analyses are VOCs, SVOCs, GRO/DRO extended, WQCC metals, and general chemistry. The purpose of these wells is to monitor the MTBE plume which appears to be migrating towards OW-50 and OW-52 as well as off-site. Therefore it is not appropriate to reduce the analyses for these wells. However, the Permittee may discontinue analysis for SVOCs, but must include GRO and DRO-extended analyses.

e) The Permittee requests that ground water monitoring well SMW-2 sample analyses be reduced to VOCs and WQCC metals. SMW-2 is part of the "sentinel well" system around the closed RCRA Land Treatment Unit. Therefore, the Permittee must continue to sample, as required, at SMW-2 for major cations, anions, VOCs, GRO/DRO extended, WQCC metals and cyanide.

f) The Permittee request to remove recovery wells RW-1, RW-2, RW-5 and RW-6 from an annual sampling schedule since these are hydrocarbon recovery wells. The Permittee proposed to continue to inspect on a quarterly basis. The Permittee must continue to monitor separate phase hydrocarbon (SPH) and ground water levels in these wells and report hydrocarbon recovery in the annual Facility-Wide Ground water Monitoring Report. If SPH are not present in the wells, then the Permittee must sample the wells for BTEX, MTBE, DRO and GRO.

g) The Permittee requests to return to the three-year schedule beginning in 2016 for production well PW-3. No SVOCs or VOCs have been detected in PW-3 since August 2008. However, because PW-3 is located hydro geologically down gradient and is in proximity to the process areas, it is important to monitor at least annually. The Permittee must continue monitoring PW-3 annually. Revise Table 1 as needed.

Response: *Table 1 in Appendix D has been revised per Comments 7a-g in the Revised 2014 Facility Wide Ground Water Monitoring Work Plan – 2014 Updates for 2015. (Attached)*

2014 Work Plan Comments
Comment 8

In Section 1.0 (Introduction), page 1-2, the Permittee states, "Group E includes a total of 45 new monitoring wells installed to delineate a hydrocarbon seep discovered west of Tank 101. Also included in this group is a pre-existing well located directly west of the truck loading rack. This well has been labeled as MKTF-45 as no markings or boring logs have been located to identify when this well was installed." In Appendix C, the Permittee lists the screened interval of MKTF-45. In the Interim Measures Report required by NMED (in a letter dated April 8, 2015), please include a description of the well survey and describe the methods used to determine the screened interval in well MKTF-45. Include information regarding the reasons the monitoring well was installed, if known. No revision to the Work Plan is necessary

Response: *No response required.*

Comment 9

In Section 3.2 (Drainages) the Permittee discusses the evaporation ponds, springs, ponds, arroyos, and the South Fork of the Rio Puerco River. Please revise this section to include a discussion of the drainage outfalls and other drainage ditches (e.g., the "conveyance" ditch affected by the DGF Feed Tank release, August 2014) in the revised Work Plan.

Response: *Revised Section 3.2 which includes additional discussions of the outfalls and conveyance ditch. (Revised section attached)*

Comment 10

In Section 6 (Monitoring Program Revisions) the Permittee requests to change the monitoring plan. Some of the requests are carried over from the previous year (see Comment 7 for NMED requirements and approval or disapproval of the requested changes). In addition, the Permittee requests several other changes:

a) The Permittee states, "Gallup Refinery has installed twenty-nine(29) monitoring wells to be added to the sampling plan for 2014 and are listed as follows: MKTF-19 through MKTF-45 and STP1-NW, STP1-SW. MKTF19 through 34 were developed in early 2014 and have been sampled and or inspected for four consecutive quarters. A review of the quarterly analytical laboratory data does not indicate any significant changes over time that would warrant continued quarterly monitoring. Western request sampling frequency to be changed to an annual basis for MKTF-19 through MKTF-26, MKTF-28, MKTF-30, MKTF-37, MKTF-38, MKTF-39, MKTF-40, MKTF-43 and MKTF-44 beginning in 2015." The Permittee is conducting corrective action related to the release from the Contact Waste Water System/Stormwater Collection System. The above-referenced wells are used to monitor the releases from the Contact Waste Water System/Stormwater Collection system. Therefore, the Permittee must continue to sample and analyze these MKTF-series ground water monitoring wells on a quarterly basis.

b) The Permittee states, "STP1-NW and STP1-SW. Initial sampling began in the second quarter of 2014. Analytical data for the past three quarters indicate no detection of BTEX, VOCs or SVOCs in STP1-NW. No detection of fluid has been detected in STP1-SW in 2014. Based on the analytical data, Western requests changing the test methods to VOCs and WQCC metals and change the sampling frequency of these wells to an Annual basis beginning in 2015." The Permittee must continue quarterly monitoring of the STP-wells and analyze for GRO, DRO, MRO, VOCs and metals. Revise Table 1 as needed.

c) Requests in paragraphs C through I are carried over from 2013, see Comment 7.

d) The Permittee states, "MKTF1-18: MKTF 1 through 18 have been sampled or inspected on a quarterly basis for all of 2014. A review of the quarterly laboratory results does not indicate any significant changes over time that would warrant continued quarterly monitoring. Western requests quarterly sampling frequency to be changed to annual beginning in 2015." See Comment 10a above.

e) The Permittee requests to, "[r]evise statement "all wells including the recovery wells containing separate phase hydrocarbons" to read "Annual sampling for all wells that are not currently on an annual schedule will also include major cations/anions, VOC, SVOC, WQCC metals." Do not sample wells that have an SPH level." The Permittee's statement is unclear; therefore NMED's decision regarding this request is deferred pending the Permittee's clarification in the revised Work Plan.

f) The Permittee notes that the requested changes have been made to Table 1. Provide a revised Table 1 that reflects the original sampling and monitoring approved in the 2011 Work Plan and include the approved changes to the Work Plans from this letter. In addition, provide a red-line strikeout version of Table 1 with the revised Work Plan.

Response: *Table 1 in Appendix D has been revised per Comments 10a-f in the Revised 2014 Facility Wide Ground Water Monitoring Work Plan – 2014 Updates for 2015. (Attached) Table 2 has been added per Comment 10(f).*

Response: *Comment 10(e); The statement is taken from Table 1, Appendix D which reads "All wells including the recovery wells containing separate phase hydrocarbons" for annual sampling event indicates sampling requirements for: Major Cations/Anions, VOC, SVOC, WQCC 20.6.2.3103 constituents. Is this sampling requirement in addition to what is already listed for quarterly and for the annual sampling locations. Several of the scheduled annual wells were approved by NMED to discontinue the SVOC analysis.*

Comment 11

It is not clear why Appendix A was included in the submission since Appendix A does not contain any information. Remove Appendix A from the Work Plan or revise to include the necessary information.

Response: *No Response Required.*

Comment 12

The table presented in Appendix C-1 (Well Data 2014 Annual/Quarterly Sampling DTB/DTW Measurements) contains several errors:

a) It appears that some of the data presented is incorrect (for example, the 2011 Survey Well Casing Rim Elevation, Stick Up Lengths for monitoring wells BW-1A through C). Review and correct the table as necessary.

b) The Permittee lists "DRY" for several wells and "0.00" for several other wells. For the wells with 0.00 reported in the Depth to Water (ft) column, there are ground water elevations listed in the Ground Water Elevation (ft) column. A reading of 0.00 indicates that ground water is at the top of the casing. NMED suspects that 0.00 is not an indicator that ground water is at the top of the casing. Either explain the difference between a dry well and a well with a 0.00 recorded for the depth to water (ft) or revise the table to display the correct data.

c) The Permittee must ensure that the table in Appendix C-2 is correct and that the data in that table is correlated to the data presented in the table in Appendix C-1.

d) Review all tables included in the Work Plan for accuracy and make corrections as necessary.

Response: *Appendix C-1 – has been revised to reflect resurvey of BW-1A/B/C. Changes are indicated in red font in the table as well as footnote 6 under Notes. An explanation of "dry" and 0.00" is also explained at the bottom of the table under "Definitions: (red font). (Table attached)*

Comment 13

Revise Table 1 in Appendix D to reflect the changes required in this letter. Provide a red-line strikeout version of the table indicating where all of the changes were made.

Response: *See responses to Comment 2, Comment 7 and Comment 10.*

Comment 14

The Permittee included well logs for the new MKTF-series ground water monitoring wells in Appendix E. The Permittee also included the logs in the 2013 Annual Ground Water Monitoring Report. NMED will review the logs as part of the required Interim Measures Report for the Hydrocarbon Seep (NMED letter dated April 8, 2015). NMED did not review the logs as part of the Work Plan, but they may remain in the Work Plan for informational purposes.

Response: *No response required.*

Comment 15

Figure 6 depicts the ground water elevation for the Chinle/Alluvium interface. The ground water contours are heavily influenced by the MKTF-series ground water monitoring wells which were affected

by the hydrocarbon seep and represent what is likely a temporary groundwater elevation level. No response is required.

Response: *No response required.*

If there are any questions regarding the responses please contact Ed Riege at (505) 722-0217 or Cheryl Johnson at 505) 722-0231.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

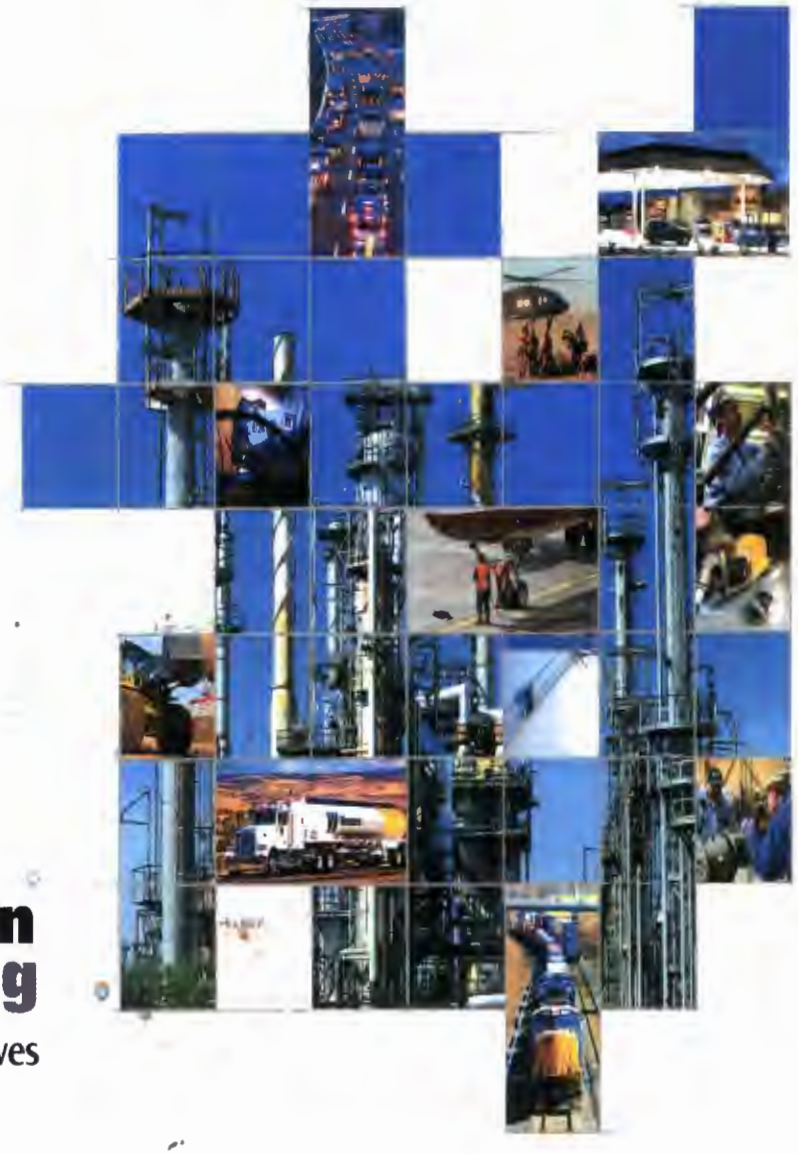
Sincerely,

William Carl McClain

William C. McClain, Jr.
Refinery Manager
Gallup Refinery

cc: D. Cobrain NMED HWB
K. Van Horn, NMED HWB
C. Chavez, OCD
E. Riege, WRG

Facility Wide Ground Water Monitoring Work Plan – 2014 Updates for 2015



Western Refining

Fueling Our Lives

Western Refining Company
Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301
505-722-3833

Submitted: February 23, 2015

REVISED: September 21, 2015

3.0 Site Conditions

The Gallup Refinery is located within a rural and sparsely populated section of McKinley County. It is situated in the high desert plain on the western flank of the Continental Divide approximately 17 miles east of Gallup. The surrounding land is comprised primarily of public lands and is used for cattle and sheep grazing at low densities[2].

3.1 Current site topography and location of natural and manmade structures

Local topography consists of a gradually inclined down-slope from high ground in the southeast to a lowland fluvial plain in the northwest. The highest point on refinery property is located at the southeast corner boundary (elevation approximately 7,040 feet) and the lowest point is located at the northwest corner boundary (elevation approximately 6,860 feet). The refinery processing facility is located on a flat man-made terrace at an elevation of approximately 6,950 feet.

3.2 Drainages

Surface water in this region consists of the man-made evaporation ponds and aeration basins located within the refinery, a livestock watering pond (Jon Myer's Pond) located east of the refinery, two small unnamed spring fed ponds located south of the refinery, and the South Fork of the Puerco River and its tributary arroyos. The various ponds and basins typically contain water consistently throughout the year. The South Fork of the Puerco River and its tributaries are intermittent and generally contain water only during, and immediately after, the occurrence of precipitation.

There are several stormwater conveyance ditches located throughout the refinery which are directed to discharge into contained basins where it is collected and recycled for use as process water, collected and allowed to evaporate, divert around regulated industrial activity or into two designated outfalls located on the east and west section of the property, identified as Outfall 1 and Outfall 2. Outfall 1 is located directly south of evaporation pond 8 on the western edge of

[2] See, for example, the web site of McKinley County at http://www.co.mckinley.nm.us/

the refinery's property boundary and equipped with four separate small diameter overflow pipelines, each with a manual flow valve for independent control. Outfall 2 is located north of the rail road loading rack on the eastern section of the facility. This outfall consists of a concrete barrier, valved to control discharges from a deep ditch that collects/ponds the runoff from the rail rack loading are.

Directly west of the crude tank area, there is also a concrete barrier, valved to control discharges from a culvert that carries stormwater flow from the truck loading rack area. This concrete barrier is located downstream of the "hydrocarbon seep area". The flow from this concrete barrier continues in a north-northwest direction alongside the sourthern bermed areas of the evaporation ponds 3, 4, 5 and 6 and outward towards the Outfall 1 area. At the new waste water treatment plant, there are three storm drains located on the south, southwest and west side of the waste water treatment plant. The DGF Feed Tank release entered the storm drain located on the southwest side of the plant which flowed downstream in a north-northwest direction between the aeration lagoons and STP-1. The flow exited from the underground culvert onto the ground at the northeast corner of Pond 2 into a conveyance ditch along the northern edge of pond 2 into a holding pond equipped with manual flow valves, located north of Pond 3. The discharge from this holding pond then flows north-northwest towards the Outfall 1 area.

3.3 Vegetation types

Surface vegetation consists of native xerophytic vegetation including grasses, shrubs, small junipers, and some prickly pear cacti. Average rainfall at the refinery is less than 7 inches per year, although it can vary to slightly higher levels elsewhere in the county depending on elevation.

On alluvial fans on valley sides and drainage ways, the existing vegetation is usually alkali sacaton, western wheatgrass, Indian rice grass, blue grama, bottlebrush squirreltail, broom snakeweed, fourwing saltbush, threeawn, winterfat, mat muhly and spike muhly. On fan remnants on valley sides we usually find blue grama, western wheatgrass, Indian ricegrass, big sagebrush, galleta, bottlebrush squirreltail, fourwing saltbrush, needleandthread, oneseed juniper, sand dropseed, spineless horsebrush, rabbitbrush, and twoneedle pinyon.

4.0 Investigation Methods

The purpose of this section is to describe the types of activities that will be conducted and the methods that will be used as part of this Plan. Appendix B provides more detailed information on actual sampling procedures that will be used.

4.1 Ground water Sampling Methodology

All monitoring wells scheduled for sampling during a ground water sampling event will be sampled within 15 working days of the start of the monitoring and sampling event.

Appendix C contains the well data summary tables for 2014. C-1 and C-1.1 provides the annual and quarterly DTW (depth to water) and DTB (depth to bottom) measurements for 2014 as well as corrected water table elevation with respect to wells that have separate phase hydrocarbon levels. C-2 and C-2.1 provides the corrected well elevation summary table for 2014 which includes date of establishment, ground elevation, top of casing elevation, well casing stick-up length, well depth, screening levels, and stratigraphic units in which the wells are located. Appendix C-3 includes well elevations for the artesian wells also known as Process or Production wells (PW). Information provided for the artesian wells was gathered from well boring logs. These wells are encased and therefore measurement for depth to bottom was not field verified.

4.1.1 Well Gauging

At the beginning of each quarterly, semi-annual, or annual sampling event, all monitoring and recovery wells listed in Appendix D, Ground Water Monitoring Schedule, will be gauged to record the depth to SPH (if present), the DTW and the DTB of the well. The gauging will be performed using an oil/water interface probe attached to a measuring tape capable of recording measurements to the nearest 0.01 foot. Each monitoring well is field verified with the well number on the well casing or adjacent to the well to ensure that samples are collected at the correct well location. Wells also have a permanent marked reference point on the well casing from which ground water levels and well depths are measured.

WELL DATA 2014 ANNUAL/QUARTERLY SAMPLING - REVISION 1
DTB/DTW MEASUREMENTS

Date of Installation	Well ID Number	Inspection or Sample Date	Casing Diameter (Inch)	2014 Survey [6] Ground Level Elevations (ft)	2014 Survey [6] Well Casing Rim Elevations (ft)	2014 Survey [6] Ground Elevation Inside Steel Sleeve (ft)	Stick-up length (ft)	2014 [6] Survey Well Casing Bottom Elevations (ft)	Total Well Depth (ft)	Depth to SPH (ft)	SPH [2] Column Thickness (ft)	Depth to Water (ft)	Ground water Elevation [3] (ft)	Corrected Water Table [4] Elevation (factor 0.8) (ft)	Screened Interval Depth Top to Bottom (ft)	2012 Stratigraphic unit in which screen exists	Purge Volume = 3 Well Vol (gal)
11/10/2003	BW-1A	9/8/2014	2.00	6,883.17	6,885.12	6,884.93	1.95	6,847.50	46.06	N/A	N/A	DRY	DRY	N/A	30 - 35	Upper Sand	N/A
10/28/2003	BW-1B	9/8/2014	2.00	6,883.17	6,885.78	6,885.72	2.61	6,818.33	76.29	N/A	N/A	DRY	DRY	N/A	54.6 - 64.6	Chinle/Alluvium Interface	N/A
11/10/2003	BW-1C	9/10/2014	2.00	6,883.17	6,885.68	6,885.64	2.51	6,749.29	145.29	N/A	N/A	12.97	6,872.71	N/A	125 -135	Sonsela	63.37
Date of Installation	**Well ID Number**	**Inspection or Sample Date**	**Casing Diameter (Inch)**	**2011 Survey [1] Ground Level Elevations (ft)**	**2011 Survey [1] Well Casing Rim Elevations (ft)**	**2011 Survey [1] Ground Elevation Inside Steel Sleeve (ft)**	**Stick-up length (ft)**	**2011 Survey [1] Well Casing Bottom Elevations (ft)**	**Total Well Depth (ft)**	**Depth to SPH (ft)**	**SPH [2] Column Thickness (ft)**	**Depth to Water (ft)**	**Ground water Elevation [3] (ft)**	**Corrected Water Table [4] Elevation (factor 0.8) (ft)**	**Screened Interval Depth Top to Bottom (ft)**	**2012 Stratigraphic unit in which screen exists**	**Purge Volume = 3 Well Vol (gal)**
11/10/2003	BW-1A	**See 2014 Survey**	2.00	**6,874.10**	**6,876.68**	**6,872.30**	**2.58**	**6,839.06**	**37.62**						**30 - 35**	Upper Sand	N/A
10/28/2003	BW-1B	**See 2014 Survey**	2.00	**6,874.13**	**6,876.94**	**6,876.26**	**2.81**	**6,809.49**	**67.45**						**54.6 - 64.6**	Chinle/Alluvium Interface	N/A
11/10/2003	BW-1C	**See 2014 Survey**	2.00	**6,873.95**	**6,876.78**	**6,872.28**	**2.83**	**6,740.39**	**136.39**						**125 -135**	Sonsela	63.37
11/10/2003	BW-2A	9/9/2014	2.00	6,871.88	6,874.69	6,870.45	2.81	6,807.12	67.57	N/A	N/A	32.25	6,842.44	N/A	55 - 65	Upper Sand	17.35
10/28/2003	BW-2B	9/9/2014	2.00	6,871.66	6,874.50	6,870.06	2.84	6,782.24	92.26	N/A	N/A	28.15	6,846.35	N/A	80 - 90	Chinle/Alluvium Interface	45.12
10/28/2003	BW-2C	9/10/2014	2.00	6,872.90	6,875.30	6,872.02	2.40	6,722.46	152.84	N/A	N/A	20.70	6,854.60	N/A	139.5 - 149.5	Sonsela	64.77
6/15/2004	BW-3A	9/8/2014	2.00	6,875.94	6,878.39	6,875.08	2.45	6,826.04	52.35	N/A	N/A	DRY	DRY	N/A	39.5 - 49.5	Upper Sand	N/A
10/15/2003	BW-3B	9/10/2014	2.00	6,876.16	6,878.59	6,875.41	2.43	6,809.19	69.40	N/A	N/A	33.25	6,845.34	N/A	63 - 73	Chinle/Alluvium Interface	17.79
7/20/2004	BW-3C	9/10/2014	2.00	6,875.72	6,877.95	6,875.27	2.23	6,723.40	154.55	N/A	N/A	7.83	6,870.12	N/A	144.5 - 154.5	Sonsela	71.59
9/25/1981	OW-11	9/12/2014	4.00	6,922.05	6,923.51	6,921.80	1.46	6,857.72	65.79	N/A	N/A	20.11	6,903.40	N/A	43 - 65	Sonsela	100.14
12/15/1980	OW-12	9/12/2014	4.00	6,939.57	6,940.69	6,939.04	1.12	6,811.84	128.85	N/A	N/A	47.78	6,892.91	N/A	117.8 - 137.8	Sonsela	179.93
10/14/1981	MW-1	9/16/2014	5.00	6,876.63	6,878.12	6,876.79	1.49	6,747.29	130.83	N/A	N/A	7.11	6,871.01	N/A	117.72 - 127.72	Sonsela	378.52
10/15/1981	MW-2	9/16/2014	5.00	6,878.39	6,880.30	6,878.41	1.91	6,742.82	137.48	N/A	N/A	9.20	6,871.10	N/A	112 - 122	Sonsela	391.8
10/16/1981	MW-4	9/17/2014	5.00	6,879.89	6,881.63	6,879.34	1.74	6,759.91	121.72	N/A	N/A	7.68	6,873.95	N/A	101 - 121	Sonsela	348.9
7/21/1986	MW-5	9/17/2014	4.00	6,880.20	6,882.83	6,881.77	2.63	6,752.00	130.83	N/A	N/A	11.38	6,871.45	N/A	115 - 125	Sonsela	365.18
9/26/1985	SMW-2	9/11/2014	2.00	6,881.63	6,883.97	6,879.07	2.34	6,831.17	52.80	N/A	N/A	25.10	6,858.87	N/A	34.31 - 54.31	Chinle/Alluvium and Upper	13.43
9/25/1985	SMW-4	9/11/2014	2.00	6,877.63	6,879.52	6,875.72	1.89	6,809.84	69.68	N/A	N/A	29.10	6,850.42	N/A	51.7 - 71.7	Chinle/Alluvium Interface	19.78
10/5/2009	OW-50	9/15/2014	2.00	6,912.63	6,914.21	6,911.46	1.58	6,850.21	64.00	N/A	N/A	16.86	6,897.35	N/A	48 - 63	Chinle/Alluvium Interface	23.49
10/5/2009	OW-52	9/15/2014	2.00	6,906.53	6,907.68	6,905.31	1.15	6,829.94	77.74	N/A	N/A	15.80	6,891.88	N/A	64 - 79	Chinle/Alluvium Interface	29.69
1/5/1981	OW-1	3/7/2014	4.00	6,866.32	6,866.62	6,866.44	0.30	6,772.07	94.55	N/A	N/A	0.00	6,866.62	N/A	89.3 - 99.3	Sonsela	177.7
		6/3/2014	4.00	6,866.32	6,866.62	6,866.44	0.30	6,772.07	94.55	N/A	N/A	0.00	6,866.62	N/A	89.3 - 99.3	Sonsela	177.7
		9/11/2014	4.00	6,866.32	6,866.62	6,866.44	0.30	6,772.07	94.55	N/A	N/A	0.01	6,866.61	N/A	89.3 - 99.3	Sonsela	182.58
		11/10/2014	4.00	6,866.32	6,866.62	6,866.44	0.30	6,772.07	94.55	N/A	N/A	0.00	6,866.62	N/A	89.3 - 99.3	Sonsela	184.37
11/25/1980	OW-10	3/7/2014	4.00	6,873.67	6,874.91	6,872.59	1.24	6,814.58	60.33	N/A	N/A	0.00	6,874.91	N/A	40 - 60	Sonslea	125.5
		6/3/2014	4.00	6,873.67	6,874.91	6,872.59	1.24	6,814.58	60.33	N/A	N/A	1.45	6,873.46	N/A	40 - 60	Sonsela	116.7
		9/12/2014	4.00	6,873.67	6,874.91	6,872.59	1.24	6,814.58	60.33	N/A	N/A	2.33	6,872.58	N/A	40 - 60	Sonsela	131.89
		11/10/2014	4.00	6,873.67	6,874.91	6,872.59	1.24	6,814.58	60.33	N/A	N/A	2.80	6,872.11	N/A	40 - 60	Sonsela	133.93
12/10/1980	OW-13	3/7/2014	4.00	6,918.95	6,920.07	6,915.33	1.12	6,820.92	99.15	N/A	N/A	21.77	6,898.30	N/A	78.2 - 98.2	Sonsela	170.07

Appendix C-1 - (Continued)

Date of Installation	Well ID Number	Inspection or Sample Date	Casing Diameter (Inch)	2011 Survey [1] Ground Level Elevations (ft)	2011 Survey [1] Well Casing Rim Elevations (ft)	2011 Survey [1] Ground Elevation Inside Steel Sleeve (ft)	Stick-up length (ft)	2011 Survey [1] Well Casing Bottom Elevations (ft)	Total Well Depth (ft)	Depth to SPH (ft)	SPH [2] Column Thickness (ft)	Depth to Water (ft)	Ground water Elevation [3] (ft)	Corrected Water Table [4] Elevation (factor 0.8) (ft)	Screened Interval Depth Top to Bottom (ft)	2012 Stratigraphic unit in which screen exists	Purge Volume = 3 Well Vol (gal)
		6/3/2014	4.00	6,918.95	6,920.07	6,915.33	1.12	6,820.92	99.15	N/A	N/A	21.95	6,898.12	N/A	78.2 - 98.2	Sonsela	169.63
		9/15/2014	4.00	6,918.95	6,920.07	6,915.33	1.12	6,820.92	99.15	N/A	N/A	22.61	6,897.46	N/A	78.2 - 98.2	Sonsela	169.5
		11/10/2014	4.00	6,918.95	6,920.07	6,915.33	1.12	6,820.92	99.15	N/A	N/A	22.45	6,897.62	N/A	78.2 - 98.2	Sonsela	170.43
12/17/1980	OW-14	3/7/2014	4.00	6,924.55	6,926.65	6,924.40	2.10	6,880.13	46.52	N/A	N/A	24.12	6,902.53	N/A	35 - 45	Chinle/Alluvium Interface	48.24
		6/3/2014	4.00	6,924.55	6,926.65	6,924.40	2.10	6,880.13	46.52	N/A	N/A	24.15	6,902.50	N/A	35 - 45	Chinle/Alluvium Interface	48.02
		9/15/2014	4.00	6,924.55	6,926.65	6,924.40	2.10	6,880.13	46.52	N/A	N/A	24.40	6,902.25	N/A	35 - 45	Chinle/Alluvium Interface	47.95
		11/10/2014	4.00	6,924.55	6,926.65	6,924.40	2.10	6,880.13	46.52	N/A	N/A	24.25	6,902.40	N/A	35 - 45	Chinle/Alluvium Interface	48.68
8/23/1996	OW-29	3/7/2014	4.00	6,913.89	6,917.00	6,912.09	3.11	6,865.92	51.08	N/A	N/A	18.85	6,898.15	N/A	37.5 - 47.5	Chinle/Alluvium Interface	70.06
		6/2/2014	4.00	6,913.89	6,917.00	6,912.09	3.11	6,865.92	51.08	N/A	N/A	18.95	6,898.05	N/A	37.5 - 47.5	Chinle/Alluvium Interface	71.93
	OW-29	9/15/2014	4.00	6,913.89	6,917.00	6,912.09	3.11	6,865.92	51.08	N/A	N/A	19.35	6,897.65	N/A	37.5 - 47.5	Chinle/Alluvium Interface	69.66
		11/11/2014	4.00	6,913.89	6,917.00	6,912.09	3.11	6,865.92	51.08	N/A	N/A	19.16	6,897.84	N/A	37.5 - 47.5	Chinle/Alluvium Interface	70.55
8/28/1996	OW-30	3/7/2014	4.00	6,921.81	6,924.69	6,919.84	2.88	6,874.79	49.90	N/A	N/A	23.42	6,901.27	N/A	37.9 - 47.9	Chinle/Alluvium Interface	57.5
		6/3/2014	4.00	6,921.81	6,924.69	6,919.84	2.88	6,874.79	49.90	N/A	N/A	23.51	6,901.18	N/A	37.9 - 47.9	Chinle/Alluvium Interface	57.05
		9/17/2014	4.00	6,921.81	6,924.69	6,919.84	2.88	6,874.79	49.90	N/A	N/A	23.84	6,900.85	N/A	37.9 - 47.9	Chinle/Alluvium Interface	56.83
		11/11/2014	4.00	6,921.81	6,924.69	6,919.84	2.88	6,874.79	49.90	N/A	N/A	23.70	6,900.99	N/A	37.9 - 47.9	Chinle/Alluvium Interface	57.72
7/8/2004	GWM-1	3/11/2014	2.00	6,910.22	6,912.61	6,908.36	2.39	6,886.41	26.20	N/A	N/A	18.92	6,893.69	N/A	17.5 - 23.5	Chinle/Alluvium Interface	4.56
		6/5/2014	2.00	6,910.22	6,912.61	6,908.36	2.39	6,886.41	26.20	N/A	N/A	19.10	6,893.51	N/A	17.5 - 23.5	Chinle/Alluvium Interface	4.28
		9/12/2014	2.00	6,910.22	6,912.61	6,908.36	2.39	6,886.41	26.20	N/A	N/A	19.56	6,893.05	N/A	17.5 - 23.5	Chinle/Alluvium Interface	4.07
		11/13/2014	2.00	6,910.22	6,912.61	6,908.36	2.39	6,886.41	26.20	N/A	N/A	20.08	6,892.53	N/A	17.5 - 23.5	Chinle/Alluvium Interface	3.81
9/25/2005	GWM-2	3/11/2014	2.00	6,910.32	6,913.09	6,908.05	2.77	6,894.28	18.81	N/A	N/A	DRY	DRY	N/A	3.2 - 16.2	Chinle/Alluvium Interface	1
		6/5/2014	2.00	6,910.32	6,913.09	6,908.05	2.77	6,894.28	18.81	N/A	N/A	DRY	DRY	N/A	3.2 - 16.2	Chinle/Alluvium Interface	0.84
		9/12/2014	2.00	6,910.32	6,913.09	6,908.05	2.77	6,894.28	18.81	N/A	N/A	DRY	DRY	N/A	3.2 - 16.2	Chinle/Alluvium Interface	0.45
		11/11/2014	2.00	6,910.32	6,913.09	6,908.05	2.77	6,894.28	18.81	N/A	N/A	DRY	DRY	N/A	3.2 - 16.2	Chinle/Alluvium Interface	0.21
9/25/2005	GWM-3	3/11/2014	2.00	6,907.35	6,910.25	6,905.48	2.90	6,892.45	17.80	N/A	N/A	DRY	DRY	N/A	3 - 15	Chinle/Alluvium Interface	NA
		6/5/2014	2.00	6,907.35	6,910.25	6,905.48	2.90	6,892.45	17.80	N/A	N/A	DRY	DRY	N/A	3 - 15	Chinle/Alluvium Interface	NA
		9/12/2014	2.00	6,907.35	6,910.25	6,905.48	2.90	6,892.45	17.80	N/A	N/A	DRY	DRY	N/A	3 - 15	Chinle/Alluvium Interface	NA
		11/11/2014	2.00	6,907.35	6,910.25	6,905.48	2.90	6,892.45	17.80	N/A	N/A	DRY	DRY	N/A	3 - 15	Chinle/Alluvium Interface	NA
3/14/2008	NAPIS-1	3/10/2014	2.00	6,913.62	6,913.86	6,913.56	0.24	6,900.33	13.53	N/A	N/A	6.78	6,907.08	N/A	3.7 - 13.7	Chinle/Alluvium Interface	2.78
		6/5/2014	2.00	6,913.62	6,913.86	6,913.56	0.24	6,900.33	13.53	N/A	N/A	6.86	6,907.00	N/A	3.7 - 13.7	Chinle/Alluvium Interface	2.76
		9/11/2014	2.00	6,913.62	6,913.86	6,913.56	0.24	6,900.33	13.53	N/A	N/A	6.85	6,907.01	N/A	3.7 - 13.7	Chinle/Alluvium Interface	3.37
		11/11/2014	2.00	6,913.62	6,913.86	6,913.56	0.24	6,900.33	13.53	N/A	N/A	6.96	6,906.90	N/A	3.7 - 13.7	Chinle/Alluvium Interface	3.36
3/14/2008	NAPIS-2	3/10/2014	2.00	6,913.40	6,912.65	6,912.54	-0.75	6,899.04	13.61	N/A	N/A	8.03	6,904.62	N/A	4.2 - 14.2	Chinle/Alluvium Interface	2.16
		6/5/2014	2.00	6,913.40	6,912.65	6,912.54	-0.75	6,899.04	13.61	N/A	N/A	8.20	6,904.45	N/A	4.2 - 14.2	Chinle/Alluvium Interface	2.25
		9/11/2014	2.00	6,913.40	6,912.65	6,912.54	-0.75	6,899.04	13.61	N/A	N/A	8.10	6,904.55	N/A	4.2 - 14.2	Chinle/Alluvium Interface	2.58
		11/11/2014	2.00	6,913.40	6,912.65	6,912.54	-0.75	6,899.04	13.61	N/A	N/A	8.20	6,904.45	N/A	4.2 - 14.2	Chinle/Alluvium Interface	2.65
3/14/2008	NAPIS-3	3/10/2014	2.00	6,913.38	6,912.76	6,912.53	-0.62	6,882.34	30.42	N/A	N/A	8.90	6,903.86	N/A	25.4 - 30-4	Chinle/Alluvium Interface	10.43
		6/5/2014	2.00	6,913.38	6,912.76	6,912.53	-0.62	6,882.34	30.42	N/A	N/A	8.85	6,903.91	N/A	25.4 - 30-4	Chinle/Alluvium Interface	10.65
		9/11/2014	2.00	6,913.38	6,912.76	6,912.53	-0.62	6,882.34	30.42	N/A	N/A	7.97	6,904.79	N/A	25.4 - 30-4	Chinle/Alluvium Interface	10.51
		11/13/2014	2.00	6,913.38	6,912.76	6,912.53	-0.62	6,882.34	30.42	N/A	N/A	9.18	6,903.58	N/A	25.4 - 30-4	Chinle/Alluvium Interface	10.67
6/11/2007	KA-3	3/10/2014	2.00	6,913.29	6,912.52	6,912.20	-0.77	6,889.32	23.20	N/A	N/A	8.03	6,904.49	N/A	15 - 25	Chinle/Alluvium Interface	6.91
		6/5/2014	2.00	6,913.29	6,912.52	6,912.20	-0.77	6,889.32	23.20	N/A	N/A	7.95	6,904.57	N/A	15 - 25	Chinle/Alluvium Interface	7
		9/11/2014	2.00	6,913.29	6,912.52	6,912.20	-0.77	6,889.32	23.20	N/A	N/A	9.00	6,903.52	N/A	15 - 25	Chinle/Alluvium Interface	7.26
		11/11/2014	2.00	6,913.29	6,912.52	6,912.20	-0.77	6,889.32	23.20	N/A	N/A	8.00	6,904.52	N/A	15 - 25	Chinle/Alluvium Interface	7.48

Appendix C-1 - (Continued)

Date of Installation	Well ID Number	Inspection or Sample Date	Casing Diameter (Inch)	2011 Survey [1] Ground Level Elevations (ft)	2011 Survey [1] Well Casing Rim Elevations (ft)	2011 Survey [1] Ground Elevation Inside Steel Sleeve (ft)	Stick-up length (ft)	2011 Survey [1] Well Casing Bottom Elevations (ft)	Total Well Depth (ft)	Depth to SPH (ft)	SPH [2] Column Thickness (ft)	Depth to Water (ft)	Ground water Elevation [3] (ft)	Corrected Water Table [4] Elevation (factor 0.8) (ft)	Screened Interval Depth Top to Bottom (ft)	2012 Stratigraphic unit in which screen exists	Purge Volume = 3 Well Vol (gal)
7/17/2012	OAPIS-1	3/10/2014	2.00	6,914.37	6,916.73	6,916.50	2.36	6,888.37	28.30	N/A	N/A	11.50	6,905.23	N/A	16 - 26	Chinle/Alluvium Interface	8.37
		6/5/2014	2.00	6,914.37	6,916.73	6,916.50	2.36	6,888.37	28.30	N/A	N/A	11.75	6,904.98	N/A	17 - 26	Chinle/Alluvium Interface	8.22
		9/12/2014	2.00	6,914.37	6,916.73	6,916.50	2.36	6,888.37	28.30	N/A	N/A	11.11	6,905.62	N/A	18 - 26	Chinle/Alluvium Interface	8.61
		11/11/2014	2.00	6,914.37	6,916.73	6,916.50	2.36	6,888.37	28.30	N/A	N/A	17.21	6,899.52	N/A	19 - 26	Chinle/Alluvium Interface	8.51
3/28/1995	RW-1	3/14/2014	4.00	6,942.86	6,946.06	6,941.25	3.20	6,903.02	43.04	28.11	3.54	31.65	6,914.41	6917.242	25 - 40	Chinle/Alluvium Interface	NA
	RW-1	6/9/2014	4.00	6,942.86	6,946.06	6,941.25	3.20	6,903.02	43.04	28.05	5.01	33.06	6,913.00	N\A	25 - 40	Chinle/Alluvium Interface	NA
		9/18/2014	4.00	6,942.86	6,946.06	6,941.25	3.20	6,903.02	43.04	28.31	Not Recorded	Not Recorded [5]	N/A	N\A	25 - 40	Chinle/Alluvium Interface	19
		11/13/2014	4.00	6,942.86	6,946.06	6,941.25	3.20	6,903.02	43.04	28.15	4.89	33.04	6,913.02	6916.932	25 - 40	Chinle/Alluvium Interface	NA
3/29/1995	RW-2	3/17/2014	4.00	6,926.40	6,928.53	6,925.02	2.13	6,888.73	39.80	0.00	0.00	24.59	6,903.94	6903.94	26.1 - 36.1	Chinle/Alluvium Interface	NA
		6/9/2014	4.00	6,926.40	6,928.53	6,925.02	2.13	6,888.73	39.80	0.00	0.00	23.79	6,904.74	6904.74	26.1 - 36.1	Chinle/Alluvium Interface	NA
		9/18/2014	4.00	6,926.40	6,928.53	6,925.02	2.13	6,888.73	39.80	0.00	0.00	23.95	6,904.58	6904.58	26.1 - 36.1	Chinle/Alluvium Interface	10
		11/13/2014	4.00	6,926.40	6,928.53	6,925.02	2.13	6,888.73	39.80	0.00	0.00	23.90	6,904.63	6904.63	26.1 - 36.1	Chinle/Alluvium Interface	NA
8/27/1997	RW-5	3/14/2014	4.00	6,941.53	6,943.57	6,940.82	2.04	6,903.98	39.59	0.00	0.00	27.92	6,915.65	6915.65	29.5 - 39.5	Chinle/Alluvium Interface	NA
		6/9/2014	4.00	6,941.53	6,943.57	6,940.82	2.04	6,903.98	39.59	0.00	0.00	28.80	6,914.77	6914.77	29.5 - 39.5	Chinle/Alluvium Interface	NA
		9/18/2014	4.00	6,941.53	6,943.57	6,940.82	2.04	6,903.98	39.59	0.00	0.00	28.81	6,914.76	6914.76	29.5 - 39.5	Chinle/Alluvium Interface	15
		11/13/2014	4.00	6,941.53	6,943.57	6,940.82	2.04	6,903.98	39.59	0.00	0.00	28.70	6,914.87	6914.87	29.5 - 39.5	Chinle/Alluvium Interface	NA
8/27/1997	RW-6	3/17/2014	4.00	6,941.96	6,944.01	6,941.49	2.05	6,903.11	40.90	0.00	0.00	28.04	6,915.97	6915.97	28.5 - 38.5	Chinle/Alluvium Interface	NA
		6/23/2014	4.00	6,941.96	6,944.01	6,941.49	2.05	6,903.11	40.90	0.00	0.00	28.85	6,915.16	6915.16	28.5 - 38.5	Chinle/Alluvium Interface	NA
		9/18/2014	4.00	6,941.96	6,944.01	6,941.49	2.05	6,903.11	40.90	0.00	0.00	28.89	6,915.12	6915.12	28.5 - 38.5	Chinle/Alluvium Interface	20
		11/13/2014	4.00	6,941.96	6,944.01	6,941.49	2.05	6,903.11	40.90	0.00	0.00	28.83	6,915.18	6915.18	28.5 - 38.5	Chinle/Alluvium Interface	NA

DEFINITIONS:
DTB - Depth to Bottom
DTW - Depth to Water
SPH = Separate Phase Hydrocarbons
N/A = Not Available
Negative number in Stick Up Length column indicates well is located at or below ground level.
Depth to Water Column - if 0.00 is indicated - means water is at top of casing (full). Dry indicates no water was detected.

NOTES:

1. *Elevation data from NMED's "Approval with Modifications, Requirement to Resurvey Ground water Monitoring Wells and Recovery Wells", dated 9/26/12.*
2. *Ground water elevation - Depth to SPH = SPH Column Thickness.*
3. *2011 Survey Well Casing Rim elevation - depth to water measurement.*
4. *Corrected Water Table Elevation applies only if SPH thickness column measurement exists. (0.8 X SPH thickness + Ground Water Elevation)*
5. *DTW measurement not recorded at time of gauging.*
6. *BW-1A, B, C: Height and width of berm was increased where these wells are located for repairs. Berm work at all evaporation ponds from April through August for berm repairs (erosion). Casings were extended and all three wells were resurveyed by HEI (Hammon Enterprises Inc) upon completion.*

Appendix D - REVISED 9-21-2015

Table 1: Gallup Refinery - Ground Water Monitoring Schedule - Approved July 24-2015

Sampling Location ID	Sampling Frequency	Collect GW Elevation, DTW, DTP	Water Quality Parameters	Analytical Suite
NAPI Secondary Containment (3 units)	Q	NA	NA	BTEX+MTBE, GRO/DRO extended, WQCC Metals or check for fluids
RW-1	Q	X	NA	Measure DTW, DTP (Hydrocarbon recovery). Sample for BTEX, MTBE, GRO/DRO if no SPH is detected.
RW-2	Q	X	NA	Same as RW-1
RW-5	Q	X	NA	Same as RW-1
RW-6	Q	X	NA	Same as RW-1
OW-1	Q	X	pH , EC, DO, ORP, Temp, TDS	Visual check for artesian flow conditions: Sample for major cations/anions, WQCC Metals, VOC, GRO/DRO extended
OW-10	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-1
OW-13	Q	X	pH , EC, DO, ORP, Temp, TDS	VOC, WQCC Metals, GRO/DRO extended.
OW-14	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-13
OW-29	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-13
OW-30	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-13
GWM-1	Q	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOC, GRO/DRO extended, WQCC Metals
GWM-2	Q	X	NA	Check for Water - if water is detected report to OCD & NMED within 24 hours. Sample for GRO/DRO extended, major cations/anions. DELETE BTEX - ADD VOCS.
GWM-3	Q	X	NA	Check for Water - if water is detected report to OCD & NMED within 24 hours. Sample for GRO/DRO extended, major cations/anions. DELETE BTEX - ADD VOCS.
NAPIS-1 [1]	Q	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, BTEX+MTBE, SVOC, GRO/DRO EXTENDED. WQCC Metals
NAPIS-2 [1]	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as Napis-1
NAPIS-3 [1]	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as Napis-1
KA- 3 [1]	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as Napis-1
OAPIS-1	Q	X	pH , EC, DO, ORP, Temp, TDS	VOC, SVOC, GRO/DRO EXTENDED, WQCC Metals, Major cations/anions, Cyanide
STP1-NW	Q	X	NA	Major cations/anions, VOCS, GRO/DRO extended, WQCC Metals
STP1-SW	Q	X	NA	Major cations/anions, VOCS, GRO/DRO extended, WQCC Metals
Boiler Water & Cooling Tower Blow down inlet to EP-2	Semi Annual (SA)		pH , EC, DO, ORP, Temp, TDS	Major Cations/Anions
Pond 1 [2]	SA		pH , EC, DO, ORP, Temp, TDS	NO LONGER IN SERVICE
Evaporation Pond 2 [2]	SA		pH , EC, DO, ORP, Temp, TDS	General Chemistry, VOC, SVOC, BOD, COD, E-Coli Bacteria, WQCC Metals

Appendix D - (Continued)

Sampling Location ID	Sampling Frequency	Collect GW Elevation, DTW, DTP	Water Quality Parameters	Analytical Suite
Evaporation Pond 3 [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 4 [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 5 [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 6 [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 7 [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 8 [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 9 [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 11 [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 12A [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Evaporation Pond 12B [2]	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
Any temporary Pond containing fluid	SA		pH , EC, DO, ORP, Temp, TDS	Same as EP-2
STP-1 TO EP-2 (EP-2 Inlet)	A		NA	VOC, GRO/DRO extended, BOD, COD, TDS
BW-1A	Annual (A)	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOC, WQCC METALS, GRO/DRO extended, DELETED SVOCs.
BW-1B	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A
BW-1C	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A
BW-2A	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A
BW-2B	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A
BW-2C	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A
BW-3A	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A
BW-3B	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A
BW-3C	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A
MW-1	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOC, GRO/DRO extended, WQCC Metals, Cyanide, SVOCs
MW-2	A	X	pH , EC, DO, ORP, Temp, TDS	Same as MW-1
MW-4	A	X	pH , EC, DO, ORP, Temp, TDS	Same as MW-1
MW-5	A	X	pH , EC, DO, ORP, Temp, TDS	Same as MW-1
OW-11	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOCS, WQCC Metals, GRO/DRO extended, deleted SVOCs.
OW-12	A	X	pH , EC, DO, ORP, Temp, TDS	VOCS, WQCC METALS, GRO/DRO extended.
OW-50	A	X	pH , EC, DO, ORP, Temp, TDS	VOCS, GRO/DRO EXTENDED, WQCC METALS, GEN CHEM. Deleted SVOCs.

Appendix D - (Continued)

Sampling Location ID	Sampling Frequency	Collect GW Elevation, DTW, DTP	Water Quality Parameters	Analytical Suite
OW-52	A	X	pH , EC, DO, ORP, Temp, TDS	VOCS, GRO/DRO EXTENDED, WQCC METALS, GEN CHEM. Deleted SVOCs.
SMW-2	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOCS, GRO/DRO extended, WQCC Metals, Cyanide
SMW-4	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOCS, SVOCS, GRO/DRO extended, WQCC Metals, Cyanide
All wells including the recovery wells containing separate phase hydrocarbons.	Annual Event	X		Major Cations/Anions, VOC, SVOC, WQCC 20.6.2.3103 Constituents.
PW-3	A	X	pH , EC, DO, ORP, Temp, TDS	VOC, SVOC, WQCC Metals, Cyanide, Nitrates
PW-2	Every 3 years. Starting in 2008	X	pH , EC, DO, ORP, Temp, TDS	VOC, SVOC, WQCC Metals, Cyanide, Nitrates
PW-4	Every 3 years. Starting in 2007	X	pH , EC, DO, ORP, Temp, TDS	VOC, SVOC, WQCC Metals, Cyanide, Nitrates
MKTF-01	Q	X	NA	VOC, SVOC, WQCC Metals, GRO/DRO extended, Major cations/anions. Ground water samples will not be collected if SPH is present in any of these wells.
MKTF-02	Q	X	NA	Same as MKTF-01
MKTF-03	Q	X	NA	Same as MKTF-01
MKTF-04	Q	X	NA	Same as MKTF-01
MKTF-05	Q	X	NA	Same as MKTF-01
MKTF-06	Q	X	NA	Same as MKTF-01
MKTF-07	Q	X	NA	Same as MKTF-01
MKTF-08	Q	X	NA	Same as MKTF-01
MKTF-09	Q	X	NA	Same as MKTF-01
MKTF-10	Q	X	NA	Same as MKTF-01
MKTF-11	Q	X	NA	Same as MKTF-01
MKTF-12	Q	X	NA	Same as MKTF-01
MKTF-13	Q	X	NA	Same as MKTF-01
MKTF-14	Q	X	NA	Same as MKTF-01
MKTF-15	Q	X	NA	Same as MKTF-01
MKTF-16	Q	X	NA	Same as MKTF-01
MKTF-17	Q	X	NA	Same as MKTF-01
MKTF-18	Q	X	NA	Same as MKTF-01
MKTF-19	Q	X	NA	Same as MKTF-01
MKTF-20	Q	X	NA	Same as MKTF-01
MKTF-21	Q	X	NA	Same as MKTF-01
MKTF-22	Q	X	NA	Same as MKTF-01
MKTF-23	Q	X	NA	Same as MKTF-01
MKTF-24	Q	X	NA	Same as MKTF-01
MKTF-25	Q	X	NA	Same as MKTF-01
MKTF-26	Q	X	NA	Same as MKTF-01
MKTF-27	Q	X	NA	Same as MKTF-01
MKTF-28	Q	X	NA	Same as MKTF-01
MKTF-29	Q	X	NA	Same as MKTF-01
MKTF-30	Q	X	NA	Same as MKTF-01
MKTF-31	Q	X	NA	Same as MKTF-01
MKTF-32	Q	X	NA	Same as MKTF-01
MKTF-33	Q	X	NA	Same as MKTF-01
MKTF-34	Q	X	NA	Same as MKTF-01
MKTF-35	Q	X	NA	Same as MKTF-01
MKTF-36	Q	X	NA	Same as MKTF-01
MKTF-37	Q	X	NA	Same as MKTF-01
MKTF-38	Q	X	NA	Same as MKTF-01
MKTF-39	Q	X	NA	Same as MKTF-01

Appendix D - (Continued)

Sampling Location ID	Sampling Frequency	Collect GW Elevation, DTW, DTP	Water Quality Parameters	Analytical Suite
MKTF-40	Q	X	NA	Same as MKTF-01
MKTF-41	Q	X	NA	Same as MKTF-01
MKTF-42	Q	X	NA	Same as MKTF-01
MKTF-43	Q	X	NA	Same as MKTF-01
MKTF-44	Q	X	NA	Same as MKTF-01
MKTF-45	Q	X	NA	Same as MKTF-01

DEFINITIONS:

STP-1 TO EP-2 - Sample collected at the inlet to Evaporation Pond 2 from STP-1

NAPIS 1 = (KA-1R); NAPIS-2 = (KA-2R), NAPIS-3 = KA-3R) - monitor wells positioned around NAPIS to detect leakage

DO- Dissolved Oxygen; ORP - Oxygen Reduction Potential; Temp - Temperature; EC - Electrical or Specific Conductivity

TDS - Total Dissolved Solids; VOC - Volatile Organic Compounds-EPA Method 8260, must include MTBE

SVOC - Semi-Volatile Organic Compounds - EPA Method 8270, must include phenol

DRO - Diesel Range Organics - EPA Method 8015B (or as modified); GRO - Gasoline Range Organics - EPA Method 8015B (or as modified)

BTEX - Benzene, Toluene, Ethylbenzene, Xylene, plus Methyl Tert-Butyl Ether (MTBE) - EPA Method 8021+MTBE

General Chemistry - pH, specific conductance, cations, Anions

DTW - Depth to Water; DTP - Depth to Product; EP - Evaporation Pond; BW - Boundary Wells

GWM wells - located around the aeration lagoons to detect leakage

MW - Monitor Well; OW - Observation Well; RW - Recovery Well; PW - Raw Water Production Well

WQCC metals include the RCRA 8 metals, must be analyzed as totals and dissolved

NA - Not Applicable

NOTES:

1) NAPIS 1, NAPIS 2, NAPIS 3: Detection of product during quarterly monitoring must comply with Section II.F.2 (twenty-four hour reporting) of NMED Post-Closure Care Permit
2) Sample using the State of New Mexico approved analytical methods as required by 20.6.4.14 NMAC, as amended through February 16, 2006 (use methods 9221-E and 9221-F, until EPA approves 40 CFR 136 methods. (Colilert, Colilert - 18, m-Coliblue24, membrane filter method)). Parameters are subject to change. Evaporation Pond samples must be collected at the inlet where waste water flows into the evaporation ponds.

Approved changes in red.

Appendix D - Table 2

Table 2: Requested/Approved Changes to the Ground Water Monitoring Schedule

Sampling Location ID	Sampling Frequency (Q - Quarterly A - Annual SA - Semi-Annual)	Collect GW Elevation, DTW, DTP	Water Quality Parameters	Analytical Suite	2014 Requested Changes	APPROVED CHANGES TO DATE PER NMED 7/24/2015
NAPI Secondary Containment (3 units)	Q	NA	NA	BTEX+MTBE, GRO/DRO extended, WQCC Metals or check for fluids	None	No changes
RW-1	Q	X	NA	Measure DTW, DTP (Hydrocarbon recovery) Sample if no SPH is detected for BTEX + MTBE, DRO/GRO.	Exclude from annual sampling. Carry over from 2013 pending approval.	Sample if no SPH is detected. Sample for: BTEX, MTBE, DRO/GRO. (NMED Comment 7(f), Approval....dated July 24, 2015)
RW-2	Q	X	NA	Same as RW-1	Exclude from annual sampling. Carry over from 2013 pending approval.	
RW-5	Q	X	NA	Same as RW-1	Exclude from annual sampling. Carry over from 2013 pending approval.	
RW-6	Q	X	NA	Same as RW-1	Exclude from annual sampling. Carry over from 2013 pending approval.	
OW-1	Q	X	pH , EC, DO, ORP, Temp, TDS	Visual check for artesian flow conditions: Sample for major cations/anions, WQCC Metals, VOC, SVOC, 8015D, TDS	Replace with VOCs, Major Cations/Anions, Arsenic, Uranium. Carry over from 2013 pending approval	Request to change sampling frequency to Annual, change analytes - denied per Comment 5, NMED Disapproval....dated 9/24/12. Continue to sample for: Major cations/anions, VOCs, GRO/DRO extended, WQCC metals, wtr quaility parameters on a quarterly basis. (See also Commnt 7(a), Approval...dated 7/24/15)
OW-10	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-1	Replace with VOCs, Major Cations/Anions, Arsenic, Uranium. Carry over from 2013 pending approval	Request to change analytes to VOCs, Major cations/anions, arsenic and uranium denied. Continue to sample for: Major cations/anions, VOCs, GRO/DRO extended, WQCC Metals - NMED Comment 7(a), Approval....dated 7/24/15).
OW-13	Q	X	pH , EC, DO, ORP, Temp, TDS	VOC, WQCC Metals, GRO/DRO extended	None	1. Addition of WWCC Metals for up-gradient wells NAPIS, per NMED Approval...dated 7/20/15. 2. Addition of GRO/DRO extended analysis per NMED requirement to submit Work Plans...dated May 11, 2015.
OW-14	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-13	None	
OW-29	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-13	None	
OW-30	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-13	None	
GWM-1	Q	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOC, GRO/DRO extended, WQCC Metals	None	No changes
GWM-2	Q	X	NA	Check for Water - if water is detected report to OCD & NMED within 24 hours. Sample for GRO/DRO extended, major cations/anions, 8260B (Changed BTEX to VOC)	Replace BTEX with VOCs for a complete list of VOCs. Carry over from 2013 pending approval.	Request to change BTEX+MTBE to VOCs approved per NMED, Comment 2...dated 7/24/15.
GWM-3	Q	X	NA	Same as GWM-2	Replace BTEX with VOCs for a complete list of VOCs. Carry over from 2013 pending approval.	
NAPIS-1 [1]	Q	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, BTEX+MTBE, SVOC, GRO/DRO EXTENDED. WQCC Metals	None	No changes
NAPIS-2 [1]	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as Napis-1	None	
NAPIS-3 [1]	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as Napis-1	None	
KA-3 [1]	Q	X	pH , EC, DO, ORP, Temp, TDS	Same as Napis-1	None	
OAPIS-1	Q	X	pH , EC, DO, ORP, Temp, TDS	Major Cations/anions, VOC, SVOC, GRO/DRO EXTENDED, WQCC Metals, Cyanide	None	Request to add to Monitoring Plan approved. Request to change monitoring frequency to Annual denied (Comment 4...dated 7/24/15.
STP1-NW	Q	X	NA	Major cations/anions, VOCS, SVOCS, GRO/DRO extended, WQCC Metals	Replace with VOCs and WQCC Metals	Request to add to Monitoring Plan approved. Request to change monitoring frequency to Annual denied (Comment 4...dated 7/24/15.
STP1-SW	Q	X	NA	Same as STP1-NW	Replace with VOCs and WQCC Metals	
Boiler Water & Cooling Tower Blow down inlet to EP-2	SA	NA	pH , EC, DO, ORP, Temp, TDS	Major Cations/Anions	None	No changes
Pond 1 [2]	SA	NA	pH , EC, DO, ORP, Temp, TDS	NO LONGER IN SERVICE	No Longer in Service	NO LONGER IN SERVICE
Evaporation Pond 2 - 9 [2]	SA	NA	pH , EC, DO, ORP, Temp, TDS	General Chemistry, VOC, SVOC, BOD, COD, E-Coli Bacteria, WQCC Metals	None	No changes
Evaporation Pond 11 [2]	SA	NA	pH , EC, DO, ORP, Temp, TDS	Same as EP-2	None	
Evaporation Pond 12a [2]	SA	NA	pH , EC, DO, ORP, Temp, TDS	Same as EP-2	None	
Evaporation Pond 12b [2]	SA	NA	pH , EC, DO, ORP, Temp, TDS	Same as EP-2	None	
Any temporary Pond containing fluid	SA	NA	pH , EC, DO, ORP, Temp, TDS	Same as EP-2	None	

Appendix D - Table 2 (Continued)

Sampling Location ID	Sampling Frequency (Q - Quarterly A - Annual SA - Semi-Annual)	Collect GW Elevation, DTW, DTP	Water Quality Parameters	Analytical Suite	2014 Requested Changes	APPROVED CHANGES TO DATE PER NMED 7/24/2015
STP-1 TO EP-2 (EP-2 Inlet)	A	NA	NA	VOC, GRO/DRO extended, BOD, COD, TDS	None	
BW-1A	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOC, WQCC METALS, GRO/DRO-extended (SVOC removed)	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	Request to reduce analyses approved for SVOCs only and add GRO/DRO-extended per NMED Comment 7(b)....dated 7/24/15.
BW-1B	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	
BW-1C	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	
BW-2A	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	
BW-2B	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	
BW-2C	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	
BW-3A	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	
BW-3B	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	
BW-3C	A	X	pH , EC, DO, ORP, Temp, TDS	Same as BW-1A	Replace with Major cations/anions, VOC, RCRA Metals. Carry over from 2013 - pending approval.	
MW-1	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOC, SVOCs, GRO/DRO extended, WQCC Metals, Cyanide	None	No Changes
MW-2	A	X	pH , EC, DO, ORP, Temp, TDS	Same as MW-1	None	
MW-4	A	X	pH , EC, DO, ORP, Temp, TDS	Same as MW-1	None	
MW-5	A	X	pH , EC, DO, ORP, Temp, TDS	Same as MW-1	None	
OW-11	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOCS, WQCC Metals, GRO/DRO-extended (SVOC removed)	Replace with Major cations/anions and WQCC Metals. Carry over from 2013 - pending approval.	Request to reduce analyses approved for SVOCS only and add GRO/DRO-extended per NMED Comment 7(c)....dated 7/24/15.
OW-12	A	X	pH , EC, DO, ORP, Temp, TDS	VOCS, GEN CHEM, WQCC METALS, GRO/DRO extended	None	1. Addition of WWCC Metals for up-gradient wells NAPIS, per NMED Approval...dated 7/20/15. 2. Addition of GRO/DRO extended analysis per NMED requirement to submit Work Plans...dated May 11, 2015.
OW-50	A	X	pH , EC, DO, ORP, Temp, TDS	VOCS, GRO/DRO EXTENDED, WQCC METALS, GEN CHEM. (SVOC removed)	Replace with VOCs and WQCC Metals. Carry over from 2013 - pending approval.	Request to change sampling frequency to Annual approved 9/24/12, Comment 6. Remove SVOCs approved per Comment 7(d)...7/24/15.
OW-52	A	X	pH , EC, DO, ORP, Temp, TDS	Same as OW-50	Replace with VOCs and WQCC Metals. Carry over from 2013 - pending approval.	
SMW-2	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOCS, SVOCS, GRO/DRO extended, WQCC Metals, Cyanide	Replace with VOCS and WQCC Metals. Carry over from 2013 - pending approval.	Request to reduce analyses denied per Comment 7(e)...7/24/15.
SMW-4	A	X	pH , EC, DO, ORP, Temp, TDS	Major cations/anions, VOCS, SVOCS, GRO/DRO extended, WQCC Metals, Cyanide	None	No changes
All wells including the recovery wells containing separate phase hydrocarbons.[7]	Annual Event	X		Major Cations/Anions, VOC, SVOC, WQCC 20.6.2.3103 Constituents.	Change to read: Annual sampling for all wells that are not currently on an annual schedule. Do not sample wells that have a detectable SPH level.	Not addressed - unclear per Comment 10(e)...7/24/15.
PW-3	A	X	pH , EC, DO, ORP, Temp, TDS	VOC, SVOC, WQCC Metals, Cyanide, Nitrates	Request to return to 3 year sampling schedule. Carry over from 2013 - pending approval.	Request to return to 3 yr sampling shedule denied, per Comment 7(g)...7/24/15. Continue to sample on Annual basis. (due to location and proximity to process area)
PW-2	Every 3 years. Starting in 2008	X	pH , EC, DO, ORP, Temp, TDS	VOC, SVOC, WQCC Metals, Cyanide, Nitrates	None	No changes
PW-4	Every 3 years. Starting in 2007	X	pH , EC, DO, ORP, Temp, TDS	VOC, SVOC, WQCC Metals, Cyanide, Nitrates	None	
MKTF-01 thru MKTF-45	Q	X	NA	Major Cations/anions, VOC, SVOC, WQCC Metals, GRO/DRO extended. Ground water samples will not be collected if SPH is present in any of these wells.	Change sampling frequency to Annual.	Request to change monitoring frequency on several wells - denied, continue with quarterly per Comment 10(a)..dated 7/24/15.

Appendix D - Table 2 (Continued)

Sampling Location ID	Sampling Frequency (Q - Quarterly A - Annual SA - Semi-Annual)	Collect GW Elevation, DTW, DTP	Water Quality Parameters	Analytical Suite	2014 Requested Changes	APPROVED CHANGES TO DATE PER NMED 7/24/2015

DEFINITIONS:

STP-1 TO EP-2 - Sample collected at the inlet to Evaporation Pond 2 from STP-1

NAPIS 1 = (KA-1R); NAPIS-2 = (KA-2R), NAPIS-3 = KA-3R) - monitor wells positioned around NAPIS to detect leakage

DO- Dissolved Oxygen; ORP - Oxygen Reduction Potential; Temp - Temperature; EC - Electrical or Specific Conductivity

TDS - Total Dissolved Solids; VOC - Volatile Organic Compounds-EPA Method 8260, must include MTBE

SVOC - Semi-Volatile Organic Compounds - EPA Method 8270, must include phenol

DRO - Diesel Range Organics - EPA Method 8015B (or as modified); GRO - Gasoline Range Organics - EPA Method 8015B (or as modified)

BTEX - Benzene, Toluene, Ethylbenzene, Xylene, plus Methyl Tert-Butyl Ether (MTBE) - EPA Method 8021+MTBE

General Chemistry - pH, specific conductance, cations, Anions

DTW - Depth to Water; DTP - Depth to Product; EP - Evaporation Pond; BW - Boundary Wells

GWM wells - located around the aeration lagoons to detect leakage

MW - Monitor Well; OW - Observation Well; RW - Recovery Well; PW - Raw Water Production Well

WQCC metals include the RCRA 8 metals, must be analyzed as totals and dissolved

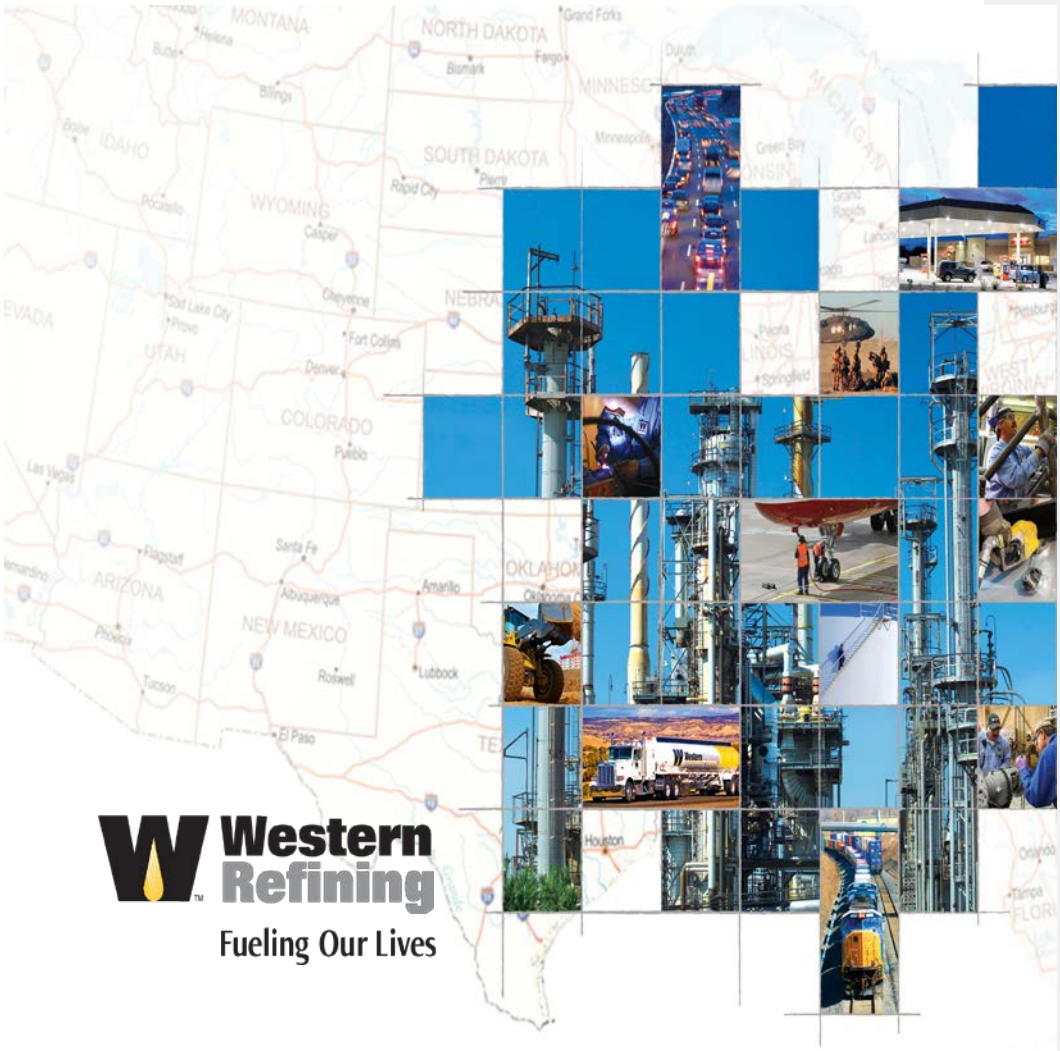
NA - Not Applicable

NOTES:

1) NAPIS 1, NAPIS 2, NAPIS 3: Detection of product during quarterly monitoring must comply with Section II.F.2 (twenty-four hour reporting) of NMED Post-Closure Care Permit

2) Sample using the State of New Mexico approved analytical methods as required by 20.6.4.14 NMAC, as amended through February 16, 2006 (use methods 9221-E and 9221-F, until EPA approves 40 CFR 136 methods. (Colilert, Colilert - 18, m-Coliblue24, membrane filter method)). Parameters are subject to change. Evaporation Pond samples must be collected at the inlet where waste water flows into the evaporation ponds.

Facility Wide Ground Water Monitoring Work Plan – 2014 Updates for 2015



Western Refining Company
Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301
505-722-3833

Submitted: February 23, 2015

REVISED: September 21, 2015

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CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

_____ _____

William C. McClain, Jr.
Refinery Manager

Date

Prepared by:

Cheryl Johnson
Environmental Specialist

Reviewed by:

Ed Riege, M.P.H.
Environmental Manager

Executive Summary

Western Refining conducts quarterly, semi-annual and annual ground water monitoring at its Gallup facility on a site wide basis. The Ground Water Monitoring Work Plan (Plan) documents any additions or revisions in ground water monitoring and also details the sampling procedures used.

This Plan divides the facility into five monitoring groups. Group A consists of the boundary wells situated along the northwest corner of the refinery property and monitoring wells around the land treatment area (LTU). Group B consists of a cluster of wells at the aeration basin and two new wells added at the sanitary treatment pond 1 (STP-1) near the Waste Water Treatment Unit. Group C consists of the observation wells on the northeast section of the refinery and also included in this group are four product recovery wells. Group D includes the process/production wells and the four observation wells located on the south-southwest section of the property.

To date a total of 45 new monitoring wells have been installed to aid in delineating the extent of a hydrocarbon seep discovered in 2013 directly west of T-101, which includes the discovery of a pre-existing well located directly west of the truck loading rack. No visible markings or drill logs were available to identify this well. Western has labeled this well as MKTF-45 as this well is located in the vicinity of the ongoing seep investigation. These monitoring wells have been added as Group E. Not included in the grouping are sampling requirements for the evaporation ponds and effluent from the new sanitary treatment pond (STP-1). Designated wells and sample points in these areas are monitored on a quarterly, semi-annual and annual 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 annually 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.

Gallup follows the most current approved sampling/monitoring schedule from NMED; "Approval With Modifications Annual Ground Water Monitoring Report, Gallup Refinery 2010, Revision 1", dated December 12, 2012" and per concurrence in Comment 6 of NMED correspondence dated September 24, 2012, "Disapproval, Facility Wide Ground Water Monitoring Work Plan, 2011 Updates, to change monitoring frequency from quarterly to annual for wells OW-50 and OW-52.

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

Refinery Manager
- William C. McClain, Jr.

Environmental Manager
- Ed Riege

Environmental Specialist
- Cheryl Johnson

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List of Acronyms

AL	Aeration Lagoon
API	American Petroleum Institute
BMP	Best Management Practices
BS	Blank Spike
BSD	Blank Spike Duplicate
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
CFR	Code of Federal Regulations
DQO	Data Quality Objective
DRO	Diesel Range Organics
DTB	Depth to Bottom
DTW	Depth to Water
EP	Evaporation Pond
EPA	Environmental Protection Agency
FT.	Foot
FWGWMP	Facility Wide Ground Water Monitoring Plan
GPM	Gallons per minute
GRO	Gasoline Range Organics
HNO3	Nitric Acid
HWB	Hazardous Waste Bureau
IDW	Investigation Derived Waste
LDU	Leak Detection Unit
LTU	Land Treatment Unit
ML	Milliliter
MCL	Maximum Contaminant Level
MS	Matrix Spike
MSD	Matrix Spike Duplicate
MTBE	Methyl Tert Butyl Ether
NAIC	North American Industry Classification System

List of Acronyms – Continued

NAPIS	New American Petroleum Institute Separator
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NOI	Notice of Intent
OAPIS	Old American Petroleum Institute Separator
OB	Observation Well
OCD	Oil Conservation Division
PPE	Personal Protective Equipment
PPM	Parts per million
PSTB	Petroleum Storage Tank Bureau
PVC	Polyvinyl Chloride
PW	Process Well
QA	Quality Assurance
QC	Quality Control
RW	Recovery Well
RCRA	Resource Conservation and Recovery Act
SIC	Standard Industrial Classification
SOP	Standard Operating Procedure
SPH	Separate Phase Hydrocarbon
STP	Sanitary Treatment Pond
SVOC	Semi-volatile Organic Compound
SWMU	Solid Waste Management Unit
SWPP	Storm Water Pollution Prevention Program
TOC	Total Organic Content
VOC	Volatile Organic Compound
WQCC	Water Quality Control Commission
WWTP	Waste water treatment plant

1.0 Introduction

This Facility-Wide Ground Water Monitoring Work Plan (Plan) has been prepared for the implementation of a ground water monitoring program at the Gallup Refinery owned by Western Refining ("Gallup Refinery" or "Facility").

1.1 Scope of Activities

This Plan has been prepared to collect data that will be used to characterize the nature and extent of potential impacts to ground water at the Gallup Refinery. 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 five groups for periodic monitoring:

GROUP A	GROUP B	GROUP C	GROUP D	GROUP E
BW-1A, B, C	GWM-1, 2, 3	OW-13, 14, 29, 30	PW-2, 3, 4	MKTF- 1 thru 45
BW-2A, B, C	NAPIS 1, 2, 3, KA-3	OW-50, 52	OW-1, 10	
BW-3A, B, C	OAPIS-1	RW-1, 2, 5, 6	OW-11, 12	
MW-1, 2, 4, 5	LDU (3)			
SMW-2, 4	STP1-NW, SW			

Group A consists of the boundary wells situated along the northwest corner of the refinery property and the monitoring wells around the LTU. Group B consists of a cluster of monitoring wells and leak detection units for the NAPIS at the aeration basin and at the new sanitary treatment pond. Group C includes the observation wells located on the northeast section of the plant and includes recovery wells from which small quantities of free product has been continually removed. Group D includes the process/production wells and four observation wells located on the south, southwest section of the refinery property. Group E includes a total of 45 new monitoring wells installed to delineate a hydrocarbon seep discovered west of Tank 101. Also included in this group is a pre-existing well located directly west of the truck loading rack.

This well has been labeled as MKTF-45 as no markings or boring logs have been located to identify when this well was installed. This plan also includes sampling requirements for the evaporation ponds and for the effluent from the sanitary treatment pond. Designated wells and sample points identified will be monitored on a quarterly, semi-annual and annual 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. Annual revisions to the Plan will 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.

1.2 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 (Parent Corporation)
123 W. Mills Avenue
El Paso, TX 79901

Operator: Western Refining Southwest Inc (Postal Address)
92 Giant Crossing Road
Gallup, New Mexico 87301

Western Refining Southwest Inc (physical address)
I-40, Exit 39 (17 Miles East of Gallup, NM)
Jamestown, New Mexico 87347

The following regulatory identification and permit governs the Gallup Refinery:

- SIC code 2911 (petroleum refining) applies to the Gallup Refinery
- U.S. EPA ID Number NMD000333211
- OCD Discharge Case Number AP-111.

The facility status is corrective action/compliance. Quarterly, semi-annual and annual ground water sampling is conducted at the facility to evaluate present contamination.

The refinery is situated on an 810 acre irregular shaped tract of land that is substantially located within the lower one quarter of Section 28 and throughout Section 33 of Township 15 North, Range 15 West of the New Mexico Prime Meridian. A small component of the property lies within the northeastern one quarter of Section 4 of Township 14 North, Range 15 West. Figure 2 is a topographic map showing the general layout of the refinery in comparison to the local topography.

2.0 Background Information

2.1 Historical and Current Site Use

Built in the 1950's, the Gallup Refinery is located within a rural and sparsely populated section of McKinley County in Jamestown, New Mexico, 17 miles east of Gallup, New Mexico. The setting is a high desert plain on the western slope of the Continental Divide. The nearest population centers are the Pilot (formerly Giant) Travel Center refueling plaza, the Interstate 40 highway corridor, and a small cluster of residential homes located on the south side of Interstate 40 approximately 2 miles southwest of the refinery (Jamestown). The surrounding land is comprised primarily of public lands and is used for cattle and sheep grazing at a density of less than six cattle or 30 sheep per section.

The refinery primarily receives crude oil via two 6 inch diameter pipelines; two pipelines from the Four Corners Area enter the refinery property from the north. In addition, the refinery also receives natural gasoline feed stock via a 4-inch diameter pipeline that comes in from the west along the Interstate 40 corridor from the Wingate Refining Wingate Facility (formerly Conoco gas plant). Crude oil and other products also arrive at the site via railroad cars. These feed stocks are then stored in tanks until refined into products.

The Gallup Refinery is a crude oil refining and petroleum products manufacturing facility. The Standard Industrial Classification (SIC) code is 2911 and the North American Industry Classification Code (NAIC) is 32411. There are no organic chemicals, plastics, or synthetic fibers manufactured that contribute to our process flow of waste water. We do not manufacture lubricating oils.

The refinery incorporates various processing units that convert crude oil and natural gasoline into finished products. These units are briefly described as follows.

- Crude Distillation Unit - separates crude oil into various fractions; including gas, naphtha, light oil, heavy oil, and residuum.

- Fluidized Catalytic Cracking Unit (FCCU) - dissociates long-chain hydrocarbon molecules into smaller molecules, and essentially converts heavier oils into naphtha and lighter oils.
- Alkylation Unit - combines specific types of hydrocarbon molecules into a high octane gasoline blending component.
- Reforming Unit - breaks up and reforms low octane naphtha molecules to form high octane naphtha.
- Hydro-Treating Unit - removes undesirable sulfur and nitrogen compounds from intermediate feed stocks, and also saturates these feed stocks with hydrogen to make diesel fuel.
- Isomerization Unit - converts low octane hydrocarbon molecules into high octane molecules.
- Treater Unit - remove impurities from various intermediate and blending feed stocks to produce finished products that comply with sales specifications.
- Ammonium Thiosulfate Unit - accepts high H2S and ammonia containing gas streams from the Amine and the Sour Water Stripper units, and converts these into a useful fertilizer product, ammonium thiosulfate.
- Sulfur Recovery Unit - converts and recovers various sulfur compounds from the gases and liquids produced in other processing units to create a solid elemental sulfur byproduct.

As a result of these processing steps, the refinery produces a wide range of petroleum products including propane, butane, unleaded gasoline, diesel, and residual fuel. In addition to the afore-mentioned processing units, various other equipment and systems support the operation of the refinery and are briefly described as follows.

Storage tanks are used throughout the refinery to hold and store crude oil, natural gasoline, intermediate feed stocks, finished products, chemicals, and water and are all located above ground. Capacity of these tanks range in size from 80,000 barrels to less than 1,000 barrels.

Pumps, valves, and piping systems are used throughout the refinery to transfer various liquids among storage tanks and processing units. A railroad spur track and a railcar loading rack are used to transfer feed stocks and products from refinery storage tanks into and out of railcars.

Several tank truck loading racks are used at the refinery to load out finished products and also receive crude oil, other feed stocks, additives, and chemicals.

Gasoline is delivered to the Pilot Travel Center via tanker truck. An underground diesel pipeline exits between the refinery and the Pilot Travel Center. As a result of an off-refinery release, the pipeline was purged of product, filled with nitrogen and temporarily placed out of service. Gallup Refinery worked with the New Mexico Environment Department (NMED) Petroleum Storage Tank Bureau (PSTB) and the New Mexico Oil Conservation Division (NMED-OCD) to place this line back in service. In 2013 the underground diesel line from Gallup Refinery to the Pilot Travel Center was replaced. The replaced line runs above ground from the marketing area of the refinery for approximately 150 feet and continues underground to the Pilot Travel Center. The diesel line was commissioned and put back in service on February 3, 2014.

A firefighting training facility is used to conduct employee firefighting training. Waste water from the facility, when training is conducted, is pumped into a tank which is then pumped out by a vacuum truck. The vacuum truck pumps the oily water into a process sewer leading to the New API Separator (NAPIS).

The process waste water system is a network of curbing, paving, catch basins, and underground piping used to collect waste water from various processing areas within the refinery. The waste water effluent then flows into the equalization tanks and the NAPIS where the oil is separated from water based on the principle that, given a quiet surface, oil will float to the water surface where it can be skimmed off. The skimmed slop is passed to a collection chamber where it is pumped back into the refinery process. The clarified water is routed to the new waste water treatment plant (WWTP) where benzene is removed and the treated water flows into the new pond STP-1. STP-1 consists of two bays, north and south and each bay is equipped with five aerators per bay. Effluent from STP-1 then flows into Evaporation Pond 2 and gravitated to the rest of the ponds.

During episodes of unit upsets or major storm events, the waste water is held in one of the three equalization tanks, T-35, T-27 and T-28 which are used to handle large process and storm water flows allowing the flow to the NAPIS to be controlled. These tanks are also used to store waste water if problems are encountered with the downstream equipment, i.e., NAPIS and the WWTP.

The new WWTP was completed and put online in May of 2012 which resulted in the intermittent use of the benzene strippers during this period. In November of 2012, the benzene strippers were taken off line permanently and by January 2013, the benzene strippers were permanently dismantled and removed.

The storm water system is a network of valves, gates, berms, embankments, culverts, trenches, ditches, natural arroyos, and retention ponds that collect, convey, control, and release storm water that falls within or passes through refinery property. Storm water that falls within the processing areas is considered equivalent to process waste water and is sent to tanks T-35, T-27 and T-28 when needed before it reaches the NAPIS, WWTP, STP-1 and into Evaporation Pond 2 where flow is gravitated to the rest of the ponds. Storm water discharge from the refinery is very infrequent due to the arid desert-like nature of the surrounding geographical area.

At the evaporation ponds, waste water is converted into vapor via solar and mechanical wind-effect evaporation via two 80 gallons per minute electrically driven evaporation pond spraying snow machines located between ponds 4 and 5. Two additional 66 gallons per minute evaporation pond sprayers were installed in October 2014 between ponds 3 and 4 for a total of four evaporators. No waste water is discharged from the refinery to surface waters of the state.

The Gallup Refinery currently operates under the Multi-Sector Permit 2008 (MSGP-2008). Gallup Refinery submitted a new Notice of Intent (NOI) for coverage under the new MSGP. The refinery maintains a Storm Water Pollution Prevention Plan (SWPPP) that includes Best Management Practices (BMPs) for effective storm water pollution prevention. The refinery has constructed several new berms in various areas and improved outfalls (installed barrier dams equipped with

gate valves) to minimize the possibility of potentially impacted runoff leaving the refinery property.

2.2 Potential Receptors

Potential receptors at the facility also include those that may arise from future land uses. Currently, these include on-site workers, nearby residents, wildlife, and livestock.[1] The major route to exposure of humans would be from contaminants reaching a drinking water well. Other routes could be from showering, cooking, etc. with contaminated ground water, raising crops and vegetables with contaminated ground water, or getting exposed to or fishing in surface water that has commingled with shallow ground water. Exposure can also occur through contact with soils and/or plants that have become contaminated themselves through contact with contaminated ground water. However, drinking water wells remain the primary route of possible exposure.

At this time, the nearest drinking water wells are located on-site at the southwest areas of the facility, at depths of approximately 3000 feet which are identified as process or production (PW) wells. These wells are designated as PW-2, PW-3 and PW-4 (See Figure 4 for location). These wells are operated by the facility to provide the refinery's process water, drinking water to nearby refinery-owned houses, to the refinery itself, and to the Pilot Travel Center. PW-2 and PW-4 are sampled every three years and PW-3 is on an annual sampling schedule which began in 2009 due to the detection of 2-methylnaphthalene and phenol during the 2007 annual sampling event conducted in January 2008. Annual sampling results from 2009 through 2014 have indicated no detection levels of volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCs). PW-3 sampling continues on an annual basis and Western has requested that this well be placed back on a 3 year schedule in Section 6.1(I).

Other than the on-site wells, there is no known drinking water wells located within a 4-mile radius of the site. The nearest drinking water wells that could be used by off-site residents are

[1] Note: There is extensive and regular patrolling by security personnel of the facility which operates 24-hours – therefore, we can discount the possibility of an inadvertent or deliberate intruder becoming exposed to contamination in groundwater that has reached the surface in some form.

located to the northwest of the site at a distance slightly greater than 4-miles located within the Navajo community of Iyanbito (shown on the USGS Topographical Map - Gallup Quadrangle (Revised 1980)). These wells are northwest of the South Fork of the Puerco River which heads towards the southwest from immediately north of the facility. As the shallowest ground water will generally flow in the direction of surface water flow, any possible shallow ground water contamination that left the facility either now or in the future would flow towards the southwest after leaving the facility and away from the community of Iyanbito. The Cibola National Forest lies in the south-east direction and there are no wells or residents in this protected area. Boundary monitoring wells along the southwest to northwest perimeter of the facility have not shown any evidence of contaminants except for low concentrations of bis(2-ethylhexyl)phthalate detected in the following wells: BW-3B in 2009, BW-3C in 2011 and BW-1C in 2013. The contaminant detected is suspected to be a laboratory contaminant or possibly from the PVC pipe materials used as casing for these wells. No detection of bis(2-ethylhexyl)phthalate was detected in any of the boundary wells in 2014.

Artesian conditions at some locations of the site lead to the possibility of ground water emerging onto the surface and thus being able to affect wildlife. No surface water on the site is used for human consumption or primary contact, such as immersion, or secondary contact, such as recreation. The man-made ponds on the site are routinely monitored and are a part of this Plan. Therefore, if they are in contact with shallow ground water that has exhibited elevated levels of contaminants, the Plan will detect any commingling of ground water and surface waters.

Fluctuating ground water elevations can smear contaminants into subsurface soil and rocks, and there is a possibility that plant roots could reach such contaminated soils and bio-concentrate contaminants creating another route of exposure to potential receptors, such as birds and animals that eat the plants. No food crops are currently grown on the site.

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

The types of waste likely include – volatile and semi-volatile organic compounds, primarily hydrocarbons, but could include various other industrial chemicals such as solvents; acids; spent caustic solutions; and heavy metals present in spent chemicals and waste water. These wastes could be in the form of waste water, spent chemicals destined for off-site shipping and disposal packed in drums, sludge, and dry solids. Dry wastes could stem from wind-blown metallic powders used as catalysts, and regular municipal solid wastes stored in covered containers destined for municipal landfills.

Most of the wastes and contaminants that could possibly reach ground water have the characteristic that they would biodegrade and naturally attenuate. However, any heavy metals present in dirt and sludge could possibly leach into ground water and would not attenuate. There is a possibility also that certain long-lived chemicals would not biodegrade, or, if they did, it would be at a very slow pace. Possible sources include leaks from buried pipes, tanks, surface spills, and historical dumping of wastes in remote areas of the site.

All above-ground large tanks have leak detection or equivalent systems, such as radar gauges. Pumps that could leak hydrocarbons are within containment areas, and all tanks are located inside earthen bermed areas to contain spills. The NAPIS has double walls and a leak detection system installed.

Similarly, surface impoundments can serve as a source of possible ground water contamination. In the past, waste water from the railroad loading rack flowed to a settling and separation lagoon south of the rack and flow exited at the north end where water leaving the lagoon was distributed across a flat open site known as the fan-out area. The free flow of liquids led to subsurface soil contamination. This area has been identified as SWMU No. 8 and has recently been cleaned up for a corrective action complete with controls status. Disposal of waste water into open fields is not practiced at the Gallup Refinery.

There are fourteen Solid Waste Management Units (SWMU) identified at the Gallup Refinery, and one closed land treatment Area. On December 31, 2013, the RCRA Post Closure Care Permit

became effective under §20.4.1.901A(10) NMAC which identified an additional 20 Areas of Concern (AOCs) requiring corrective action and are listed below.

RCRA (Resource Conservation and Recovery Act) Regulated Units

- Land Treatment Unit (LTU)

SWMUs (Solid Waste Management Units)

- SWMU 1 – Aeration Basin
- SWMU 2 – Evaporation Ponds
- SWMU 3 – Empty Container Storage Area
- SWMU 4 – Old Burn Pit
- SWMU 5 – Landfill Areas
- SWMU 6 – Tank Farm
- SWMU 7 – Fire Training Area
- SWMU 8 – Railroad Rack Lagoon
- SWMU 9 – Drainage Ditch and the Inactive Land farm
- SWMU 10 – Sludge Pits
- SWMU 11 – Secondary Oil Skimmer
- SWMU 12 – Contact Wastewater Collection System
- SWMU 13 – Drainage Ditch between North and South Evaporation Ponds
- SWMU 14 – API Separator

AOCs (Areas of Concern)

- AOC 15 – New API Separator
- AOC 16 – New API Separator Overflow Tanks
- AOC 17 – Railroad Loading/Unloading Facility
- AOC 18 – Asphalt Tank Farm (tanks 701-709, 713, 714)
- AOC 19 – East Fuel Oil Loading Rack
- AOC 20 – Crude Slop and Ethanol Unloading Facility
- AOC 21 – Main Loading Racks
- AOC 22 – Loading Rack Additive Tank Farm
- AOC 23 – Retail Fuel Tank Farm (tanks 1-7, 912, 913, 1001, 1002)
- AOC 24 – Crude Oil Tank Farm (tanks 101 and 102)
- AOC 25 – Tank 573 (Kerosene Tank)
- AOC 26 – Process Units
- AOC 27 – Boiler and Cooling Unit Area
- AOC 28 – Warehouse and Maintenance Shop Area
- AOC 29 – Equipment Yard and Drum Storage Area
- AOC 30 – Laboratory

- AOC 31 – Tanks 27 and 28
- AOC 32 – Flare and Ancillary Tanks (tanks Z85V2, Z85V3, Z84-T105)
- AOC 33 – Storm Water Collection System
- AOC 34 – Scrap Yard
-

Existing ground water monitoring wells effectively surround all of the above listed SWMUs and AOCs.

2.4 Summary of contaminant releases that could contribute to possible ground water contamination.

Spills and leaks are known to have occurred on the site in various locations. Although most hydrocarbons are rapidly picked up for recovery and contaminated soil is removed, some of the liquids present in a spill enter the subsurface. With precipitation, there is a possibility that some of the contaminants could leach and reach ground water.

Separate Phase Hydrocarbons (SPH) floating on shallow ground water has been found at the northeast end of the facility. A series of recovery wells were installed and SPH has been pumped out for several years. Recovery through hand-bailing continues on a quarterly basis indicating that the volume of SPH has continued to drop substantially from year to year in several of these recovery wells. In 2014, only Recovery Well (RW-1) had measureable levels of hydrocarbons. Trace levels of benzene have also been found in the wells in this area possibly linked to past spills. Recovery wells are listed as follows:

RECOVERY WELLS			
RW-1	RW-2	RW-5	RW-6

Years ago a small tank that held Methyl Tert Butyl Ether (MTBE) leaked and created a plume of MTBE in the shallow ground water at the northeast end of the refinery. This tank is no longer in service and was removed. MTBE has not been used at the refinery since April 2006. Several monitoring wells were installed at various depths to monitor SPH and MTBE contaminant plumes from historical contamination. These observation wells (OW) are located downstream on the northeast section of the plant and are designated as follows.

OBSERVATION WELLS					
OW-13	OW-14	OW-29	OW-30	OW-50	OW-52

A unit at the southwest end of the facility that is used to recover and recycle oil back into the process has also – through leakage and spills – caused some MTBE and hydrocarbon contamination in shallow ground water. This unit is known as the NAPIS and was put into service in October 2004. The NAPIS has one up-gradient well NAPIS-1, located on the east side and three down-gradient shallow monitoring wells, NAPIS-2, NAPIS-3 and KA-3 which are located along the west side. The NAPIS unit is also equipped with three leak detection units on the east and west bays and also at the oil sump section on the east bay.

The Aeration Basin, which is designated as SWMU No. 1 in the facility's RCRA Post-Closure Care Permit includes three cells, known as AL-1, AL-2 and holding pond 1 which is currently referred to as EP-1, although it is not an evaporation pond and is not part of the area covered by SWMU No. 2 – Evaporation Ponds. With the start up of the new Waste Water Treatment Plant in 2013, all waste water flow has been diverted to the WWTP and the lagoons and pond 1 are no longer receiving any waste water. Western has experienced intermittent discharges of oil and oily water into the lagoons and spills to ground surface while this was in operation. Most of these occurrences were the result of unit upsets and or large storm events affecting the old API Separator.

Two ground water monitoring wells (GWM-1, GWM-2)were installed immediately down gradient of the aeration lagoons in 2004 and 2005 in order to detect potential leakage from the aeration basin. GWM-3 was also installed in 2005 on the northwest corner of pond 1 (EP-1).

Analysis of ground water samples collected at GWM-1 and GWM-2 have indicated several organic constituents at concentrations above the screening levels in ground water which would indicate a potential for historical releases from the lagoons. GWM-2 and 3 upon installation in 2005 were found to be dry. Water was first detected in GWM-2 in the first quarter of 2008 and

in GWM-3 in the third quarter of 2010. 24-hour notification of the finding was given to NMED and OCD respectively. Analysis of ground water samples collected from GWM-2 and GWM-3 have detected the presence of several constituents at concentration levels above applicable water quality standards such as fluoride, chloride, nitrates, and sulfates. No VOCs have been detected in GWM-2 or GWM-3.

Quarterly inspections in 2011 and 2012 continued to indicate an increase in measurable water levels in GWM-2 and GWM-3; however water levels began to decrease in late 2012. Continued quarterly inspections indicated no water level in GWM-2 and GWM-3 in 2013 and 2014. A request was made to NMED in the 2012 Updates to change analytical requirements from 8021B to 8260B + MTBE for a more detailed list of volatile organic compounds and currently awaiting approval for this change.

Both GWM-2 and GWM-3 have been included in the Aeration Basin Corrective Action Work Plan which began investigative soil and water sampling near the aeration basin in the third quarter of 2012 to support selection of a remedy for SWMU NO. 1 and determine the source of water detected in GWM-2 and GWM-3. Figure 4 shows the location of all of the active monitoring wells on the facility.

In February of 2012, Western submitted a "Revised Investigation Work Plan Solid Waste Management Unit (SWMU) No. 1 Aeration Basin to include sampling of soils and ground water surrounding the Aeration Basin to determine if there has been a release to the environment and to delineate any such release. In addition, information was collected to help determine the source of ground water that had been observed in monitoring wells GWM-2 and GWM-3. The work plan also included SWMU No. 14 Old API Separator soil and ground water sampling. A new well OAPIS-1 (SWMU 14-2) was installed on the northwest corner where the benzene strippers were located on July 17, 2012 by Enviro-Drill Inc. OAPIS-1 (SWMU 14-2) has been added to the 2014 Monitoring Schedule to be sampled on a quarterly basis.

In February of 2013, the influent to the aeration lagoons was routed to the new Waste Water Treatment Plant (WWTP). The aeration lagoons and pond 1 (EP-1), are no longer in service and are being investigated as described above. Pilot sanitary effluent was also routed to the WWTP in June of 2013.

In June of 2013 during a routine inspection a hydrocarbon seep was discovered in an isolated area approximately 100 yards west of Tank 101/102. A series of excavations were completed in the area of the seep including installation of six (6) temporary sumps for weekly hydrocarbon recovery. Through 2014 a total of 362,987 gallons of liquid (hydrocarbon and ground water) have been recovered from the site. There were a total of five (5) hand auger and 22 soil borings with temporary well completions completed at the start of the site investigation. An additional 25 permanent, flush mount and/or stick up monitoring wells have been installed with an addition of one pre-existing well which has been labeled as MKTF-45 and located in the vicinity of the site investigation. Western continues to further characterize potential source areas, recovery of liquids from the temporary sumps, and continued sampling of the monitoring wells for characterization and delineation purposes. A copy of the Well Installation boring logs are included in this report in Appendix E as well as the professional engineer's survey report included in Appendix F. An additional 27 wells will be added to the 2014 Ground Water Monitoring Schedule (see Appendix D).

3.0 Site Conditions

The Gallup Refinery is located within a rural and sparsely populated section of McKinley County. It is situated in the high desert plain on the western flank of the Continental Divide approximately 17 miles east of Gallup. The surrounding land is comprised primarily of public lands and is used for cattle and sheep grazing at low densities[2].

3.1 Current site topography and location of natural and manmade structures

Local topography consists of a gradually inclined down-slope from high ground in the southeast to a lowland fluvial plain in the northwest. The highest point on refinery property is located at the southeast corner boundary (elevation approximately 7,040 feet) and the lowest point is located at the northwest corner boundary (elevation approximately 6,860 feet). The refinery processing facility is located on a flat man-made terrace at an elevation of approximately 6,950 feet.

3.2 Drainages

Surface water in this region consists of the man-made evaporation ponds and aeration basins located within the refinery, a livestock watering pond (Jon Myer's Pond) located east of the refinery, two small unnamed spring fed ponds located south of the refinery, and the South Fork of the Puerco River and its tributary arroyos. The various ponds and basins typically contain water consistently throughout the year. The South Fork of the Puerco River and its tributaries are intermittent and generally contain water only during, and immediately after, the occurrence of precipitation.

There are several stormwater conveyance ditches located throughout the refinery which are directed to discharge into contained basins where it is collected and recycled for use as process water, collected and allowed to evaporate, divert around regulated industrial activity or into two designated outfalls located on the east and west section of the property, identified as Outfall 1 and Outfall 2. Outfall 1 is located directly south of evaporation pond 8 on the western edge of

[2] See, for example, the web site of McKinley County at http://www.co.mckinley.nm.us/

the refinery's property boundary and equipped with four separate small diameter overflow pipelines, each with a manual flow valve for independent control. Outfall 2 is located north of the rail road loading rack on the eastern section of the facility. This outfall consists of a concrete barrier, valved to control discharges from a deep ditch that collects/ponds the runoff from the rail rack loading are.

Directly west of the crude tank area, there is also a concrete barrier, valved to control discharges from a culvert that carries stormwater flow from the truck loading rack area. This concrete barrier is located downstream of the "hydrocarbon seep area". The flow from this concrete barrier continues in a north-northwest direction alongside the sourthern bermed areas of the evaporation ponds 3, 4, 5 and 6 and outward towards the Outfall 1 area. At the new waste water treatment plant, there are three storm drains located on the south, southwest and west side of the waste water treatment plant. The DGF Feed Tank release entered the storm drain located on the southwest side of the plant which flowed downstream in a north-northwest direction between the aeration lagoons and STP-1. The flow exited from the underground culvert onto the ground at the northeast corner of Pond 2 into a conveyance ditch along the northern edge of pond 2 into a holding pond equipped with manual flow valves, located north of Pond 3. The discharge from this holding pond then flows north-northwest towards the Outfall 1 area.

3.3 Vegetation types

Surface vegetation consists of native xerophytic vegetation including grasses, shrubs, small junipers, and some prickly pear cacti. Average rainfall at the refinery is less than 7 inches per year, although it can vary to slightly higher levels elsewhere in the county depending on elevation.

On alluvial fans on valley sides and drainage ways, the existing vegetation is usually alkali sacaton, western wheatgrass, Indian rice grass, blue grama, bottlebrush squirreltail, broom snakeweed, fourwing saltbush, threeawn, winterfat, mat muhly and spike muhly. On fan remnants on valley sides we usually find blue grama, western wheatgrass, Indian ricegrass, big sagebrush, galleta, bottlebrush squirreltail, fourwing saltbrush, needleandthread, oneseed juniper, sand dropseed, spineless horsebrush, rabbitbrush, and twoneedle pinyon.

3.4 Erosion features

The impacts of historic overgrazing are visible at the north-side of the facility, in the form of arroyos that formed when surface run-off cut through the ground and washed away soils that were not able to hold water with their ground cover lost to overgrazing. Now that the facility is fenced and no livestock grazing occurs on the site, vegetation has recovered in these areas. With the facility helping to bring back vegetation in its undeveloped areas the formation and deepening of erosion features on its land has decreased.

3.5 Subsurface conditions

3.5.1 Soil types and associations

Most of the soils found at the surface in the locations where wells are located consist of the Mentmore-Gish complex.[3] These soils occur in alluvial fans on valley sides and fan remnants on valley sides. The parent material for these soils is slope and fan alluvium derived from sandstone and shale. These are well drained soils with moderately slow (0.2 in/hr) to slow permeability (0.06 in/hr). In this association, the Gish and similar soils make up about 45 percent, the Mentmore and similar soils 35 percent, and minor components 20 percent. These minor components are - Berryhill and similar soils 10 percent, and Anodize and similar soils 10 percent. The typical profile for these soils is – 0 to 2 inches fine sandy loam, 2 to 72 inches of various kinds of clay loam.

Drill logs for various wells have been provided electronically to the NMED/HWB. From these well logs we can infer that the soils in the subsurface are generally composed of clays starting at the immediate subsurface, interbedded with narrow sand and silt layers. At about 100 to 150 feet, layers of mudstone, sandstone (from the Chinle formation, Petrified Forest group) and siltstone start to appear. Figure 3 shows a generalized relationship of soils in and around the Gallup Refinery.

[3] Soil Survey of McKinley County Area, New Mexico, McKinley County and Parts of Cibola and San Juan Counties, Natural Resources Conservation Service (NRCS), US Department of Agriculture, available at - http://soildatamart.nrcs.usda.gov/Manuscripts/NM692/0/McKinley.Area%20NM.pdf

3.5.2 Stratigraphy

The 810 acre refinery property site is located on a layered geologic formation. Surface soils generally consist of fluvial and alluvial deposits; primarily clay and silt with minor inter-bedded sand layers. Below this surface layer is the Chinle Formation, which consists of low permeability clay stones and siltstones that comprise the shale of this formation. As such, the Chinle Formation effectively serves as an aquiclude. Inter-bedded within the Chinle Formation is the Sonsela Sandstone bed, which represents the uppermost potential aquifer in the region.

The Sonsela Sandstone bed lies within and parallels the dip of the Chinle Formation. As such, its high point is located southeast of the refinery and it slopes downward to the northwest as it passes under the refinery. Due to the confinement of the Chinle Formation aquiclude, the Sonsela Sandstone bed acts as a water-bearing reservoir and is artesian at its lower extremis. Artesian conditions exist through much of the central and western portions of the refinery property.

3.5.3 Presence and flow direction of ground water

Ground water flow within the Chinle Formation is extremely slow and typically averages less than 10^{-10} centimeters per second (less than 0.01 feet per year). Ground water flow within the surface soil layer above the Chinle Formation is highly variable due to the presence of complex and irregular stratigraphy; including sand stringers, cobble beds, and dense clay layers. As such, hydraulic conductivity may range from less than 10^{-2} centimeters per second in the gravelly sands immediately overlying the Chinle Formation up to 10^{-8} centimeters per second in the clay soil layers located near the surface.

Shallow ground water located under refinery property generally flows along the upper contact of the Chinle Formation. The prevailing flow direction is from the southeast and toward the northwest. In the past, a subsurface ridge has been identified that was thought to deflect some flow in a northeast direction in the vicinity of the refinery tank farm. This is not clear from the present data.

4.0 Investigation Methods

The purpose of this section is to describe the types of activities that will be conducted and the methods that will be used as part of this Plan. Appendix B provides more detailed information on actual sampling procedures that will be used.

4.1 Ground water Sampling Methodology

All monitoring wells scheduled for sampling during a ground water sampling event will be sampled within 15 working days of the start of the monitoring and sampling event.

Appendix C contains the well data summary tables for 2014. C-1 and C-1.1 provides the annual and quarterly DTW (depth to water) and DTB (depth to bottom) measurements for 2014 as well as corrected water table elevation with respect to wells that have separate phase hydrocarbon levels. C-2 and C-2.1 provides the corrected well elevation summary table for 2014 which includes date of establishment, ground elevation, top of casing elevation, well casing stick-up length, well depth, screening levels, and stratigraphic units in which the wells are located. Appendix C-3 includes well elevations for the artesian wells also known as Process or Production wells (PW). Information provided for the artesian wells was gathered from well boring logs. These wells are encased and therefore measurement for depth to bottom was not field verified.

4.1.1 Well Gauging

At the beginning of each quarterly, semi-annual, or annual sampling event, all monitoring and recovery wells listed in Appendix D, Ground Water Monitoring Schedule, will be gauged to record the depth to SPH (if present), the DTW and the DTB of the well. The gauging will be performed using an oil/water interface probe attached to a measuring tape capable of recording measurements to the nearest 0.01 foot. ~~All measurements will be made relative to the same datum for all wells.~~ Each monitoring well is field verified with the well number on the well casing or adjacent to the well to ensure that samples are collected at the correct well location. Wells also have a permanent marked reference point on the well casing from which ground water levels and well depths are measured.

Gauging measurements will be recorded on a field gauging form. Data obtained from the gauging will be reported in the annual ground water monitoring report. The data will be used to develop groundwater contour maps and SPH thickness isopleths which will also be included in the annual report.

4.1.2 Well Purging

Each monitoring well will be purged by removing ground water prior to sampling in order to ensure that formation water is being sampled. Generally, at least three well volumes (or a minimum of two if the well has low recharge rate) will be purged from each well prior to sampling. Field water quality measurements must stabilize for a minimum of three consecutive readings before purging will be discontinued. Field water quality measurements will include pH, electrical conductivity, temperature, and dissolved oxygen (DO) %. Field water quality measurement stability will be determined when field parameter readings stabilize to within ten percent between readings for three consecutive measurements. Once the readings are within ten percent, purging will stop and the well is ready for sample collection. The volume of ground water purged, the instruments used, and the readings obtained at each interval will be recorded on the field-monitoring log. Well purging and sampling will be performed using 1 inch x 3 foot disposable polyethylene bailers for ground water sampling and/or appropriately decontaminated portable sampling pumps.

4.2 Ground water Sample Collection

Ground water samples will be obtained from each well within 24 hours of the completion of well purging. Sample collection methods will be documented in the field monitoring reports. The samples will be transferred to the appropriate, clean, laboratory-prepared containers provided by the analytical laboratory. Sample handling and chain-of-custody (COC) procedures are described in more detail in Appendix B. Decontamination procedures for reusable water sampling equipment are described in Appendix B.

All purged ground water and decontamination water from monitoring wells will be drained into the refinery waste water treatment system upstream of the NAPIS. The procedures for disposing materials are described in Appendix B.

Ground water samples intended for metals analysis will be submitted to the laboratory as total metals samples. Ground water samples obtained for dissolved metals analysis will be filtered through disposable filters with a 0.45 micrometers mesh size.

4.2.1 Sample Handling

All sample containers are supplied by the contracted analytical laboratory and shipped to Western in sealed coolers. Chemical preservation is also provided by the laboratory through pre-preserved bottle ware. Collection of containerized ground water samples are in the order of most volatile to least volatile, such as: VOCs, SVOCs, metals, phenols, cyanide, sulfate, chloride, and nitrates. Immediately after the samples are collected, they will be stored in a cooler with ice or other appropriate storage method until they are delivered to the analytical laboratory. Standard COC procedures as detailed in Appendix B will be followed for all samples collected. All samples will be submitted to the laboratory as soon as possible to allow the laboratory to conduct the analyses within the specified method holding times. Details of the general sample handling procedures are provided in Appendix B.

The following shipping procedures will be performed during each sampling event:

- Individual sample containers will be packed to prevent breakage and transported in a sealed cooler with ice or other suitable coolant or other EPA or industry-wide accepted method. The drainage hole at the bottom of the cooler will be sealed and secured in case of sample container leakage.
- Each cooler or other container will be delivered directly to the analytical laboratory.
- Glass bottles will be separated in the shipping container by cushioning material to prevent breakage.
- Plastic containers will be protected from possible puncture during shipping using cushioning material.
- The COC form and sample request form will be shipped inside the sealed storage container to be delivered to the laboratory.

- Signed and dated COC seals will be applied to each cooler prior to transport of samples from the site.

4.3 Analytical Methods

Ground water and surface water samples collected during the monitoring events will be analyzed for the constituents listed in Appendix D. In addition, for various locations the list of metals is modified to either be the Skinner list of the NM Water Quality Control Commission list or RCRA 8 metals list. Appendix D provides a summary of target analytes for each EPA analytical method.

4.4 Quality Assurance Procedures

Contract analytical laboratories will maintain internal quality assurance programs in accordance with EPA and industry accepted practices and procedures. At a minimum, the laboratories will use a combination of standards, blanks, surrogates, duplicates, matrix spike/matrix spike duplicates (MS/MSD), blank spike/blank spike duplicates (BS/BSD), and laboratory control samples to demonstrate analytical Quality Assurance/Quality Control (QA/QC). The laboratories will establish control limits for individual chemicals or groups of chemicals based on the long-term performance of the test methods. In addition, the laboratories will establish internal QA/QC that meets EPA's laboratory certification requirements. The specific procedures to be completed are identified in the following sections.

4.4.1 Equipment Calibration Procedures and Frequency

The laboratory's equipment calibration procedures, calibration frequency, and calibration standards will be in accordance with the EPA test methodology requirements and documented in the laboratory's quality assurance (QA) and Standard Operating Procedures (SOP) manuals. All instruments and equipment used by the laboratory will be operated, calibrated, and maintained according to the manufacturers' guidelines and recommendations. Operation, calibration, and maintenance will be performed by personnel who have been properly trained in these procedures. A routine schedule and record of instrument calibration and maintenance will be kept on file at the laboratory.

4.4.2 Field QA/QC Samples

Field duplicates and trip blanks may be obtained for quality assurance during sampling activities. The samples will be handled as described in Section 4.4.3.

Trip blanks will accompany laboratory sample bottles and shipping and storage containers intended for VOC analyses. Trip blanks will consist of a sample of analyte free de-ionized water placed in an appropriate sample container. Trip blanks will be analyzed at a frequency of one for each shipping event involving twenty or more samples. Generally, a trip blank will only be placed in one of the containers, if more than one container is used to ship the set of samples.

4.4.3 Laboratory QA/QC Samples

Analytical procedures will be evaluated by analyzing reagent or method blanks, surrogates, MS/MSDs, BS/BSDs and/or laboratory duplicates, as appropriate for each method. The laboratory QA/QC samples and frequency of analysis to be completed will be documented in the cited EPA or other test methodologies. At a minimum, the laboratory will analyze laboratory blanks, MS/MSDs, BS/BSDs and laboratory duplicates at a frequency of one in twenty for all batch runs requiring EPA test methods and a frequency of one in ten for non-EPA test methods. Laboratory batch QA/QC samples will be project specific.

4.4.4 Laboratory Deliverables

The analytical data package will be prepared in accordance with EPA-established Level II analytical support protocol which will include:

- Transmittal letter, including information about the receipt of samples, the testing methodology performed, any deviations from the required procedures, any problems encountered in the analysis of the samples, any data quality exceptions, and any corrective actions taken by the laboratory relative to the quality of the data contained in the report;
- Sample analytical results, including sampling date; date of sample extraction or preparation; date of sample analysis; dilution factors and test method identification; water sample results in consistent units (milligrams per liter or micrograms per liter (µg/L)); and detection limits for undetected analytes. Results will be reported for all field samples, including field duplicates and blanks, submitted for analysis;

- Method blank results, including reporting limits for undetected analytes;
- Surrogate recovery results and corresponding control limits for samples and method blanks (organic analyses only);
- Laboratory duplicate results for inorganic analyses, including relative percent differences and corresponding control limits;
- Sample COC documentation;
- Holding times and conditions;
- Conformance with required analytical protocol(s);
- Instrument calibration;
- Blanks;
- Detection/quantitative limits;
- Recoveries of surrogates and/or matrix spikes (MS/MSDs);
- Variability for duplicate analyses;
- Completeness;
- Data report formats;

Data deliverables provided by the laboratory that include analysis of organic compounds will also include the following:

- A cover letter referencing the procedure used and discussing any analytical problems, deviations, and modifications, including signature from authority representative certifying to the quality and authenticity of data as reported;
- A report of sample collection, extraction, and analysis dates, including sample holding conditions,
- Tabulated results for samples in units as specified, including data qualification in conformance with EPA protocol, and definition of data descriptor codes;
- Final extract volumes (and dilutions required), sample size, wet-to-dry weight ratios, and instrument practical detection/quantitative limit for each analyte,
- Analyte concentrations with reporting units identified, including data qualification and a description of the qualifiers,
- Quantification of analytes in all blank analyses, as well as identification of method blank associated with each sample,
- Recovery assessments and a replicate sample summary, including all surrogate spike recovery data with spike levels/concentrations for each sample and all MS/MSD results (recoveries and spike amounts).

4.4.5 Review of Field and Laboratory QA/QC Data

The sample data, field, and laboratory QA/QC results will be evaluated for acceptability with respect to the data quality objectives (DQOs). Each group of samples will be compared with the DQOs and evaluated using data validation guidelines contained in EPA guidance documents:

Guidance Document for the Assessment of RCRA Environmental Data Quality, National Functional Guidelines for Organic Data Review, and Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analyses, and the most recent version of SW-846, and industry-accepted QA/QC methods and procedures.

The laboratory will notify the Gallup Refinery Project Manager of data quality exceptions within one business day of identifying the data quality exception in order to allow for sample re-analysis, if possible. The Gallup Refinery Project Manager will contact NMED within one business day of receipt of laboratory notification of data quality exceptions in order to discuss the implementations and determine whether the data will still be considered acceptable, or if sample re-analysis or re-sampling is necessary.

4.4.6 Blanks, Field Duplicates, Reporting Limits and Holding Times

4.4.6.1 Blanks

The analytical results of field blanks and field rinsate blanks will be reviewed to evaluate the adequacy of the equipment decontamination procedures and the possibility of cross-contamination caused by decontamination of sampling equipment. The analytical results of trip blanks will be reviewed to evaluate the possibility for contamination resulting from the laboratory-prepared sample containers or the sample transport containers. The analytical results of laboratory blanks will be reviewed to evaluate the possibility of contamination caused by the analytical procedures. If contaminants are detected in field or laboratory blanks, the sample data will be qualified, as appropriate.

4.4.6.2 Field Duplicates

Field duplicates will consist of two samples either split from the same sample device or collected sequentially. Field duplicate ground water samples will be collected at a frequency of one per ten regular samples and will be analyzed for the full set of analyses used for the regular sample collected. At a minimum, one duplicate sample per sampling day must always be obtained.

4.4.6.3 Method Reporting Limits

Method reporting limits for sample analyses will be established at the lowest level practicable for the method and analyte concentrations and will not exceed ground water or surface water cleanup standards and screening levels. Detection limits that exceed established standards or screening levels and are reported as "not detected" will be considered data quality exceptions and an explanation for its acceptability for use will be provided.

4.4.6.4 Holding Times

Per EPA protocol the sampling, extraction, and analysis dates will be reviewed to confirm that extraction and analyses were completed within the recommended holding times. Appropriate data qualifiers will be noted if holding times are exceeded.

4.4.7 Representativeness and Comparability

4.4.7.1 Representativeness

Representativeness is a qualitative parameter related to the degree to which the sample data represent the relevant specific characteristics of the media sampled. Procedures will be implemented to assure representative samples are collected and analyzed, such as repeated measurements of the same parameter at the same location over several distinct sampling events. Any procedures or variations that may affect the collection or analysis of representative samples will be noted and the data will be qualified.

4.4.7.2 Comparability

Comparability is a qualitative parameter related to whether similar sample data can be compared. To assure comparability, analytical results will be reported in appropriate units for comparison with other data (past studies, comparable sites, screening levels, and cleanup standards), and standard collection and analytical procedures will be implemented. Any procedure or variation that may affect comparability will be noted and the data will be qualified.

4.4.8 Laboratory Reporting, Documentation, Data Reduction, and Corrective Action

Upon receipt of each laboratory data package, data will be evaluated against the criteria outlined in the previous sections. Any deviation from the established criteria will be noted and the data will be qualified. A full review and discussion of analytical data QA/QC and all data qualifiers will be submitted as appendices or attachments to the ground water monitoring reports. Data validation procedures for all samples will include checking the following, when appropriate:

- Holding times
- Detection limits
- Field equipment rinsate blanks
- Field blanks
- Field Duplicates
- Trip blanks
- Reagent blanks
- Laboratory duplicates
- Laboratory blanks
- Laboratory matrix spikes
- Laboratory matrix spike duplicates
- Laboratory blank spikes
- Laboratory blank spike duplicates
- Surrogate recoveries

If significant quality assurance problems are encountered, appropriate corrective action will be implemented. All corrective action will be reported and the corrected data will be qualified.

5.0 Monitoring and Sampling Program

The primary objective of ground water monitoring is to provide data which will be used to assess ground water quality at and near the facility. Ground water elevation data will also be collected to evaluate ground water flow conditions. The ground water monitoring program for the facility will consist of sample collection and analysis from a series of monitoring wells, recovery wells, outfalls, and evaporation pond locations.

The monitoring network is divided into five investigation areas (Group A, B, C, D and E). The sampling frequency, analyses and target analytes will vary for each investigation area including outfalls and evaporation pond location. The combined data from these investigation areas will

be used to assess ground water quality beneath and immediately down-gradient of the facility, and evaluate local ground water flow conditions.

Samples will not be collected from monitoring wells that have measurable SPH. For wells that are purged dry, samples will be collected if recharge volume is sufficient for sample collection within 24 hours. Wells not sampled due to insufficient recharge will be documented in the field log.

The following sections outline the monitoring program for each investigation area.

5.1 Group A Through Group E

5.1.1 Sampling Locations

The location of the monitoring, recovery wells and leak detection units are shown in Figure 4. The following wells will be sampled (as described in Appendix D):

GROUP A	GROUP B	GROUP C	GROUP D	GROUP E
BW-1A, B, C	GWM-1, 2, 3	OW-13, 14, 29, 30	PW-2, 3, 4	MKTF- 1 thru 45
BW-2A, B, C	NAPIS 1, 2, 3, KA-3	OW-50, 52	OW-1, 10	
BW-3A, B, C	OAPIS-1	RW-1, 2, 5, 6	OW-11, 12	
MW-1, 2, 4, 5	LDU (3)			
SMW-2, 4	STP1-NW, SW			

5.2 Evaporation Ponds, Outfalls

5.2.1 Sampling Locations

The following outfalls and ponds will be sampled (as described in Appendix D, Table 1). (Note: these outfalls are from one section of the waste water treatment system to another – they do not discharge to any location outside the facility).

OUTFALLS		
STP-1 to EP-2		
Boiler Water Inlet to EP-2		
PONDS		
Pond 1 – No longer in service	EP-5	EP-9
EP-2	EP-6	EP-11
EP-3	EP-7	EP-12A
EP-4	EP-8	EP-12B

6.0 Monitoring Program Revisions

Upon review of the analytical results from the monitoring events under this Plan, historic facility-wide monitoring data, available soil boring data, and other related information Western Refining will assess the monitoring program presented in this Plan. Revisions to the Plan, as necessary, will then be presented for agency review and approval on an annual basis. These revisions may include, but not be limited to, a reduction or change in monitoring locations, monitoring frequency, and/or target analytes listed in Appendix D, Table 1.

6.1 Requests for Modifications to Sampling Plan

A. Gallup Refinery has installed twenty-nine (29) monitoring wells to be added to the 2014 sampling plan for 2015 and are listed as follows:

MKTF-19	MKTF-25	MKTF-31	MKTF-37	MKTF-43
MKTF-20	MKTF-26	MKTF-32	MKTF-38	MKTF-44
MKTF-21	MKTF-27	MKTF-33	MKTF-39	MKTF-45
MKTF-22	MKTF-28	MKTF-34	MKTF-40	
MKTF-23	MKTF-29	MKTF-35	MKTF-41	STP1-NW
MKTF-24	MKTF-30	MKTF-36	MKTF-42	STP1-SW

MKTF 19 through 34 were all developed in early 2014 and have been sampled and or inspected for four consecutive quarters. A review of the quarterly analytical laboratory data does not indicate any significant changes over time that would warrant continued quarterly monitoring. Western requests sampling frequency to be changed to an annual basis for wells MKTF-19 through MKTF-26, MKTF-28, MKTF-36, MKTF-37, MKTF-38, MKTF-39, MKTF-40, MKTF-43, and MKTF-44 beginning in 2015.

As soon as four quarters of monitoring on MKTF 27, MKTF-29, MKTF-30, MKTF-31, MKTF-32, MKTF-33, MKTF-34, MKTF-41 and MKTF-42 (perimeter wells) have been completed and laboratory analyses indicate no significant increase in concentration, sampling frequency will be changed to semi-annual to monitor plume stability. If the initial quarterly monitoring indicates an obvious increase in concentration trend, Western will continue to monitor individual wells on a quarterly basis for one more year at which time Western may request to modify sampling frequency and/or change analyte test methods. Samples will not be collected from monitoring wells that have a measureable separate phase hydrocarbon (SPH) level.

Sampling will be analyzed for VOCs, SVOCs, Water Quality Control Commission (WQCC) metals (total and dissolved), gasoline range organics (GRO), diesel range organics (DRO) extended, and major cations and anions.

B. STP1-NW and STP1-SW. Initial sampling began in the second quarter of 2014. Analytical data for the past three quarters indicate no detection of BTEX, VOCs, or SVOCs in STP1-NW. No detection of fluid has been detected in STP1-SW in 2014. Based on the analytical data, Western requests changing test methods to VOCs and WQCC Metals and change the sampling frequency of these wells to an Annual basis beginning in 2015.

C. OW-1 and OW-10: (Carry over from 2013 Update Request). Change the quarterly analytical sampling test methods to: VOCs, and Major Cations/Anions, Arsenic and Uranium. Analytical data indicates no DRO/GRO/MRO has ever been detected in either of these wells. Recent installations of wells listed in 6.1A above are all up-gradient from these two wells. There are also the boundary wells which are monitored annually.

D. BW-1A, BW-1B, BW-1C, BW-2A, BW-2B, BW-2C, BW-3A, BW-3B, BW-3C: (Carry over from 2013 Update Request). Change to RCRA metals (total and dissolved) and drop SVOCs, continue with Major cations/anions and VOCs. Only the analyte bis(2-ethylhexyl)

phthalate has been detected in BW-3B, BW-3C and in BW-1C. The detection of this SVOC may possibly be a lab contaminant or from PVC pipe materials used as casing for these wells).

E. OW-11: (Carry over from 2013 Update Request). Reduce analyses to major cations/anions and WQCC Metals (total and dissolved). No VOCs or SVOCs has been detected in this well with exception of single hit of bis(2-ethylhexyl)phthalate which may possibly be a lab contaminant or from PVC pipe materials used as casing for this well).

F. OW-50 and OW-52: Reduce analyses to BTEX plus MTBE and WQCC metals (total and dissolved). NO VOCs or SVOCs have been detected in either of these wells with the exception of a single hit of bis(2-ethylhexyl)phthalate in OW-50 on March 16, 2010 which may possibly be a lab contaminant or from PVC pipe materials used as casing for this well).

G. SMW-2: (Carry over from 2013 Update Request). Reduce analyses to only VOCs and WQCC Metals. Analytical data indicate no detection of DRO/GRO/MRO or SVOCs.

H. RW-1, RW-2, RW-5 and RW-6: (Carry over from 2013 Update Request). Remove from annual sampling schedule as these wells are hydrocarbon recovery wells. These wells will continue to be inspected on a quarterly basis.

I. PW-3: Return to 3 year sampling schedule to begin in 2017. (Carry over from 2013 Update Request). No VOCs or SVOCs have been detected since August 2008 to present and has been sampled annually for five consecutive years with no significant changes.

J. MKTF 1-18: MKTF 1 through 18 have been sampled and or inspected on a quarterly basis for all of 2014. A review of the quarterly laboratory results does not indicate any significant changes over time that would warrant continued quarterly monitoring. Western requests quarterly sampling frequency be changed to annual beginning 2015.

K. Revise statement "All wells including the recovery wells containing separate phase hydrocarbons", to read "Annual sampling for all wells that are not currently on an annual schedule will also include Major cations/anions, VOC, SVOC, WQCC metals." Do not sample wells that have an SPH level.

These additions and revisions have been incorporated into Table 1: Ground Water Monitoring Schedule in Appendix D pending approval from NMED and OCD. Western will continue with the most current monitoring schedule per approval from NMED dated December 12, 2012, "Approval With Modifications Annual Ground Water Monitoring Report, Gallup Refinery 2010, Revision 1", and per concurrence in Comment 6 of NMED correspondence dated September 24, 2012, "Disapproval, Facility Wide Ground Water Monitoring Work Plan, 2011 Updates, to change monitoring frequency from quarterly to annual for wells OW-50 and OW-52.

Appendix A – Left Blank

Appendix B: Gallup Field Sampling Collection and Handling Standard Procedures

Field Data Collection: Elevation and Purging

All facility monitoring wells and recovery wells are gauged as required through the year. Gallup does not have any recovery well pumps that need to be shut off and removed prior to water elevation measurements.

Each monitoring well is field verified with the well number on the well casing or adjacent to the well to ensure that samples are collected at the correct well location. Wells also have a permanent marked reference point on the well casing from which ground water levels and well depths are measured. The portable pump intake is lowered to the midpoint of the listed screened interval for each specific well using the markings identified on the pump hose which are set every ten feet. In wells with dedicated pumps, the pumps have been installed at the midpoint of the screened interval.

All water/product levels are measured to an accuracy of the nearest 0.01 foot using an electrical conductivity based meter, the Heron Instruments 100 ft. DipperT electric water depth tape complying with US GGG-T-106E, EEC Class II. After determining water levels, well volumes are calculated using the appropriate conversion factors for a given well based on its internal diameter. Volume is equal to the height of the liquid column times the internal cross-sectional area of the well.

Generally, at least three well volumes (or a minimum of two if the well has low recharge) are purged from each well prior to sampling. Field water quality parameters measured during purging (pH, electrical conductivity, temperature, and dissolved oxygen), must stabilize to within 10% for a minimum of three consecutive measurements before collection of ground water samples from each well.

Before sample collection can begin, the water collected from each monitoring well must be fresh aquifer water. Well evacuation replaces stagnant well water with fresh aquifer water. The water level in the well, total depth of well and thickness of floating product (if any) will be measured using the DipperT electric water depth tape. If product is present, a ground water sample is typically not obtained.

If a well is pumped or bailed dry before two or three well volumes can be evacuated, it requires only that sufficient time elapse for an adequate volume of water to accumulate for the sampling event. The first sample will be tested for pH, temperature, specific conductivity and dissolved oxygen (%). The well will be retested for pH, temperature, specific conductivity and dissolved oxygen (%) after sampling as a measure of purging efficiency and as a check on the stability of the water samples over time. All well evacuation information will be recorded in a log book.

Wells MW-1, MW-2, MW-4, MW-5, BW-1C, BW-2A, BW-2B, BW-3B, SMW-4, OW-1, OW-10, OW-13, OW-14, OW-29 and OW-30 are each equipped with a dedicated electrical pump. The remaining wells are purged using a portable Grundfos pump. Recovery wells and NAPIS-1, NAPIS-2, NAPIS-3 and KA-3 are hand-bailed as well as GWM-1, GWM-2, GWM-3 and OAPIS-1 is hand-bailed if the presence of water is detected.

New wells MKTF 1 thru 45 and STP1-NW and STP1-SW are all hand-bailed if the presence of water is detected. If SPH is detected in any of these wells, no samples are collected.

Purged well water from wells is collected in fifty-five gallon drums or totes and drained to the process sewer upstream of the NAPIS. The water is treated in the refinery's waste water treatment system.

Sampling Equipment at Gallup

The following sampling equipment is maintained at Gallup and used by the sampling personnel:

- Heron Instruments 100 ft. DipperT electric water depth tape complying with US GGG-T-106E, EEC Class II.

- Pall Corporation Acro 50A 0.45 micron disposable filter used with 60 ml. disposable syringes for filtering water in the field.
- YSI pH/Conductivity meter Model 63, calibrated with a one-point, two-point, or three-point calibration procedure using pH standards of 7, 4 and 10.
- IQ Scientific Instruments, pH/Temperature/Conductivity/ Dissolved Oxygen meter, Model IQ1806LP.
- Grundfos 2-inch pumps with Grundfos 115-volt AC–to-DC converter.

Calibration and maintenance procedures will be performed according to the manufacturer's specifications.

Order of Collection

Samples will be collected in the order listed below:

Parameter	**Bottle Type**
VOC, SVOC	40 ml VOA vials, (H2SO4)
TOC	1 liter glass jar, H2SO4
Extractable Organics	1 liter glass jar with Teflon™ cap
Metals* Total and Dissolved	500 ml, 125 ml plastic, HNO3
Phenols, Cyanide	1 liter glass jar
Chloride, Sulfate, Nitrates	1 liter plastic, no preservative

* Prefiltration bottle for dissolved metals which is subsequently filtered in the field and transferred to a pint plastic bottle with HNO3 preservative.

Filtration

Ground water samples are filtered prior to dissolve metals analysis. For dissolved metals, sample water is poured into a jar and then extracted with a syringe. The syringe is then used to force the sample water through a 0.45 micron pore filter paper filter into the proper sample bottle to collect dissolved metals samples. Filtration must be performed within two hours of sample collection. Pour the filtrate into a sample bottle containing HNO3 preservative.

For samples destined for total metals analysis, do not filter the sample, and preserve with HNO3 to pH <2 in the field.

Gallup sampling personnel carry a cell phone when gathering ground water and other water samples. While sampling procedures are generally well known and the appropriate sample bottles are ordered to match each sampling event, occasional questions do arise from unforeseen circumstances which may develop during sampling. At such times, sampling personnel contact Hall Environmental Analytical Laboratory to verify that sampling is correctly performed.

Sample Handling Procedures

At a minimum, the following procedures will be used when collecting samples:

- Neoprene, nitrile, or other protective gloves will be worn when collecting samples. New disposable gloves will be used to collect each sample.
- All samples collected for chemical analysis will be transferred into clean sample containers supplied by the analytical laboratory. The sample container will be clearly marked. Sample container volumes and preservation methods will be in accordance with the most recent standard EPA and industry accepted practices for use by accredited analytical laboratories. Sufficient sample volume will be obtained for the laboratory to complete the method-specific QC analyses on a laboratory-batch basis.
- Sample labels and documentation will be completed for each sample.

Immediately after the samples are collected, they will be stored in a cooler with ice or other appropriate storage method until they are delivered to the analytical laboratory. Standard chain-of-custody procedures, as described in Section 4.2.1 of this Plan, will be followed for all samples collected. All samples will be submitted to the laboratory to allow the laboratory to conduct the analyses within the method holding times.

General Well Sampling Procedures

For safety protection and sampling purity, rubber gloves are worn and changed between each activity.

Prepare for sampling event by making out sample bottle labels and have bottles separated into plastic bags for each well to be sampled and placed in an ice chest ready to take into the field. Bring along a note book and sample log. Document weather conditions, sample date and time. Fill in label with location, date, time, analysis, preservative, and your name. Start sampling by

adjusting converter speed for each well. Affix sample label and fill bottle according to lab instructions. For samples intended for VOC analysis, use bottles with septa lids, fill bottle to neck and add final amount of water with cap to form meniscus. Turn bottles upside down to examine for bubbles, if bubbles are detected in the vial, repeat collection procedure. If no bubbles show, secure lids and pack in bubble wrap and place in cooler until sampling is completed.

Decontaminate equipment that is not dedicated for use in a particular well. Refrigerate completed samples until shipping to lab. Be sure to check holding times and arrange for appropriate shipping method. Be sure that the field effort is adequately staffed and equipped. Check QC requirements before departing—QC samples require additional equipment and supplies.

Surface Water Sample Collection

At the evaporation ponds, samples will be collected as a grab sample at the pond edge near the inlets. This location will be noted in the field notebooks. The sampler will avoid disturbing sediment and gently allow the sample container to fill making sure that undue disturbance does not allow volatile contaminants to be lost. The sample bottle will be used for the sample collection in a shallow location near the bank. If a separate bottle and/or bailer are used to refill the sample container, this will be duly noted in the field log books. The decision to use a separate bottle/bailer will be made, if at all, by the sampler and the reasons for doing so will be noted in the field log book.

Upon arrival at the field site, the sampler will set out safety equipment such as traffic cones and signs (if required). The vehicle will be parked a sufficient distance away so as to prevent sample contamination from emissions. Appropriate sample containers and gloves must be used for the type of analyses to be performed.

Decontamination Procedures

The objective of the decontamination procedures is to minimize the potential for cross-contamination

The majority of field equipment used for ground water sampling will be disposable and, therefore, not require decontamination. In order to prevent cross-contamination, field equipment that comes into contact with water or soil will be decontaminated between each sampling location. The decontamination procedure will consist of washing the equipment with a non-phosphate detergent solution (examples include Fantastik™, Liqui-Nox®), followed by two rinses of distilled water and air dried.

Decontamination water and rinsate will be contained and disposed of the same way as purge water, as described in Section 4.2. Decontamination procedures and the cleaning agents used will be documented in the daily field log.

Field Equipment Calibration Procedures

Field equipment requiring calibration will be calibrated to known standards, in accordance with the manufacturers' recommended schedules and procedures. Calibration checks will be conducted daily and the instruments will be recalibrated if necessary. Calibration measurements will be recorded in the daily field logs.

If field equipment becomes inoperable, its use will be discontinued until the necessary repairs are made. A properly calibrated replacement instrument will be used in the interim. Instrumentation used during sampling events will be recorded in the daily field logs.

Collection and Management of Investigation Derived Waste

Investigation derived waste (IDW) generated during each groundwater sampling event may include purge water, decontamination water, excess sample material, and disposable sampling equipment. All water from all wells generated during sampling and decontamination activities will be temporarily stored in labeled 55-gallon drums until placed in the refinery wastewater treatment system upstream of the API separator. All other solid waste generated during sampling activities (including sampling gloves, tubing, etc) will be disposed of with the Refinery's general municipal waste.

Documentation of Field Activities

Daily field activities, including observations and field procedures, will be recorded using indelible ink on field sampling forms. The original field forms will be maintained at Gallup Refinery. Completed forms will be maintained in a bound and sequentially numbered field file for reference during field activities. The daily record of field activities will include the following information:

- Well ID/ Evaporation pond location/ Outfall
- Date
- Start and finish sampling time
- Field team members, including visitors
- Weather conditions
- Daily activities and times conducted
- Observations
- Record of samples collected with sample designations
- Photo log (if needed)
- Field monitoring data, including health and safety monitoring (if needed)
- Equipment used and calibration records, if appropriate
- List of additional data sheets and maps completed
- An inventory of the waste generated and the method of storage or disposal
- Signature of personnel completing the field record

Sample Custody

All samples collected for analysis will be recorded in the field report or data sheets. Chain-of-custody forms will be completed at the end of each sampling day, prior to the transfer of samples off site, and will accompany the samples during shipment to the laboratory. A signed and dated custody seal will be affixed to the lid of the shipping container. Upon receipt of the samples at the laboratory, the custody seals will be broken, the chain-of-custody form will be signed as received by the laboratory, and the conditions of the samples will be recorded on the form. The original chain-of-custody form will remain with the laboratory. Gallup Refinery will maintain copies of all chain-of-custody forms generated as part of sampling activities. Copies of the chain-of-custody records will be included with all draft and final laboratory reports submitted to NMED and OCD.