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September 28, 2017

Mr. John E. Kieling, Chief
New Mexico Environmental Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

**RE: **RESPONSE TO APPROVAL WITH MODIFICATIONS
REVISED LETTER REPORT EVAPORATION POND 7 DIKE BREACH AND
SUMMARY REPORT EVAPORATION POND REPAIRS
WESTERN REFINING SOUTHWEST INC. GALLUP
REFINERY
EPA ID # NMD000333211
WWB-WRG-15-006****

Dear Mr. Keiling:

This letter provides a response to New Mexico Environment Department's (NMED's) August 22, 2017 comments regarding the *Summary Report-Evaporation Pond Repairs* dated February 15, 2017 submitted by Western Refining Southwest, Inc. (Andeavor).

In summary, the NMED comments span a variety of topics related to the following:

1. Berm inspections;
2. Existing geotechnical properties of the berm soil;
3. Preparing a work plan that describes data to be collected in the field;
4. Installing new piezometers in the downstream face of the berms;
5. Collecting effective strength parameters from new geotechnical samples;
6. Collecting water level data from the newly installed piezometers;
7. Using existing and new geotechnical properties and
8. Updating numerical slope stability analysis;
9. Preparing a new report that details the following:
 - a. New field data and updates to the numerical slope stability analysis;
 - b. A seismic analysis that includes liquefaction potential analysis;

- c. Rapid drawdown of water from the evaporation ponds;
- d. Vehicular loading on the berms surrounding the evaporation ponds;


The scope of work required to address the above listed items will require a significant amount of time to complete. Andeavor intends to continue the berm improvement work while at the same time satisfying the NMED requirements. Therefore, in order to ensure that this ongoing work does not become unproductive and/or convoluted by multiple back and forth correspondence between Andeavor and NMED, Andeavor respectfully requests a sit-down meeting with NMED to discuss the comments and the best means to continue forward.

Andeavor believes the meeting will result in a clear understanding of the exact work being requested and the scope and content of the deliverable that will result from the work. In addition, a schedule of the work can be discussed and realistic deadlines can be determined.

The deadlines identified in the NMED letter (updated tables by September 29, 2017 and a new report by December 29, 2017) are not possible due to the magnitude and length of time to complete the required work. Accordingly, Andeavor respectfully requests an extension to the deadlines.

Please call me at 505-726-9743 or email me at William.M.Bailey@andeavor.com to arrange a meeting. We can meet in Santa Fe, Albuquerque, or Gallup at your convenience.

Sincerely,



Mr. William Bailey
Environmental Supervisor

cc: K. Van Horn NMED HWB
A. Hains WRG
C. Chavez EMNRD OCD
S. Holcomb, NMED, SWQB
L. King EPA Region 6