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Delivered via Federal Express Mail

September 30, 2018

Mr. John E. Kieling  
Bureau Chief, Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Bldg 1  
Santa Fe, NM 87505-6313

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS  
HYDROCARBON SEEP INTERIM MEASURES  
2017 4<sup>TH</sup> QUARTER STATUS REPORT  
WESTERN REFINING SOUTHWEST INC, GALLUP REFINERY  
EPA ID #NMD000333211  
HWB-WRG-18-001**

Dear Mr. Kieling:

Gallup Refinery is in receipt of your letter of March 2, 2018, which provided comments on the referenced report, dated January 1, 2018. The following responses address each of your comments.

**NMED Comment 1**

In Stand Pipes Recovery Records, the volume of recovered hydrocarbons and water is recorded to an accuracy of one-gallon during the fourth quarter measurements. For example, the volume of recovered hydrocarbons and water for November 9, 2017 is recorded as 24 and 4,976 gallons, respectively. Previously, the measured volumes were recorded to an accuracy of five-gallons. Provide an explanation regarding the variance of the measuring techniques in a response letter.

**Gallup Refinery Response:** There is no known difference in the actual measuring techniques, but different vacuum truck operators may make a more concerted effort than others to estimate the volume. We provide the data collected by the operators, but have noted repeatedly that these are estimated volumes. Please remember, the total fluids (water and hydrocarbon) are recovered into a vacuum truck and then the volume is estimated from what is contained in the truck prior to discharge.

**NMED Comment 2**

In the first bullet of the list of activities conducted during fourth quarter 2017, the Permittee states, "[a]pproximately 38,400 gallons of groundwater/hydrocarbon mixture were recovered during the fourth quarter. That represents a reduction from the previous quarter at 59,400 gallons. An estimated volume of 1,145 gallons of SPH was recovered from the retention ditch in comparison to 535 gallons in the third quarter." Despite the reduction in total fluid recovery, oil recovery volume more than doubled during the fourth quarter compared to the oil recovery volume during the third quarter. Overall, the trend in oil recovery appears to be increasing throughout 2017. A variance in field measurement or collection techniques may have caused the apparent increase in recovered oil. Explain whether there was a variation in measurement or collection techniques. If there are other potential causes for the presence and increase in volume of recovered oil (e.g., spills or releases), then the Permittee must propose to investigate the cause.

**Gallup Refinery Response:** There was a temporary increase in the volume of hydrocarbons recovered from approximately September 2017 through January 2018. Since January 2018, the volume of hydrocarbons recovered has reduced significantly, as has been reported in the first two quarterly status reports for 2018.

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No apparent source of the temporary increase has been identified despite extensive efforts to locate any potential sources. Efforts taken to locate potential sources have included reviews of tank inventory volumes, isolation of tanks/inspections, excavations of product transfer lines, exploratory excavations throughout the tank farm and soil borings, etc. We continue to routinely monitor the volume of hydrocarbon coming to the retention ditch and stand pipes and the volume of hydrocarbons has decreased significantly.

### NMED Comment 3

In the second bullet of the list of activities conducted during fourth quarter 2017, the Permittee states, "[a] [camera survey] contract has not yet been secured with the preferred vendor." In a response letter, describe whether the contracting issue has been resolved. If not, the Permittee must explain the nature of the issues or investigate the availability of alternative vendors. The Permittee must investigate potential on-going leaks and potential sources for releases to the environment through camera surveys as required in a timely manner.

**Gallup Refinery Response:** Although the volume of hydrocarbon reaching the seep area has reduced significantly, Gallup Refinery continues to investigate for potential sources. As explained above in the response to comment No. 2, we are conducting a variety of activities to locate potential sources. In addition, we have recently submitted a new Investigation Work Plan for Area of Concern (AOC) 35, which covers the area around the Truck Loading Rack. This area was identified as a possible second source area in addition to the leaking sewer line west of the Bundle Pad, which was previously replaced.

### NMED Comment 4

In the third bullet of the list of activities conducted during fourth quarter 2017, the Permittee states, "[as the sumps are located beneath the truck loading rack that is constantly in service, any additional testing in this immediate area will require extensive internal coordination." Dye tracer may be introduced from locations other than the immediate sumps as long as the release origin is directly connected to the sumps, Investigate the possibility of introducing the dye from alternative locations that are more accessible. If the test can be conducted, the Permittee must include a proposal for the dye test in any future 2018 reports. If not, the Permittee must provide a more detailed explanation why the test cannot be conducted from other release location in a response letter. The Permittee must address all potential on-going leaks and potential sources of releases to the environment.

**Gallup Refinery Response:** Gallup Refinery has conducted several previous dye tests in the area of the loading rack; however, because each of the sumps is connected via an underground pipeline it has not been possible to discern which of the individual sumps and/or connecting pipelines may be leaking. Repeating the previous dye tests is anticipated to produce the same results as observed earlier and no acceptable manner has been devised to isolate the connecting sewer pipelines.

As noted above, a new Investigation Work Plan for AOC 35 was recently submitted. This Work Plan includes gaining access to the loading bays where sumps are located to conduct soil and potentially groundwater sampling immediately adjacent to the sumps. Gallup Refinery believes that the actual collection of soil and possibly groundwater samples will be more definitive as to whether a particular sump and/or the connected sewer pipeline is a source of contamination.

If you have any questions about the information being provided herein, please do not hesitate to contact Brian Moore by telephone at (505) 726-9745 or by email at [Brian.Moore@andeavor.com](mailto:Brian.Moore@andeavor.com).

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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.*

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Statile", written over a large, loopy scribble.

Daniel Statile  
Vice President Refining  
Western Refining Southwest, Inc. – Gallup Refinery

Enclosure

cc: K. Van Horn, NMED (via e-mail)  
C. Chavez, OCD (via electronic submittal)