



NEW MEXICO  
ENVIRONMENT DEPARTMENT

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Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

February 7, 2019

John Moore  
Environmental Superintendent  
Western Refining, Southwest Inc., Gallup Refinery  
92 Giant Crossing Road  
Gallup, New Mexico 87301

**RE: APPROVAL WITH MODIFICATIONS  
HYDROCARBON SEEP INTERIM MEASURES 2018 3<sup>RD</sup> QUARTER STATUS  
REPORT  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-18-017**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Hydrocarbon Seep Interim Measures 2018 3<sup>rd</sup> Quarter Status Report* (Report), dated December 13, 2018, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications. The Permittee must address the following comments:

**Comment 1**

In the *Cover Letter*, the Permittee states, “[i]ncluded with the submittal are electronic files on CD.” However, electronic files were not included with the submittal. Provide an electronic version of the Report and Cover Letter no later than **March 8, 2019**.

**Comment 2**

In the *Activities Conducted During Third Quarter 2018* Section, the Permittee states, “[a]lthough no SPH was recovered from the standpipe sumps, SPH was recovered from the retention ditch area to the north.” It is not clear whether the retention ditch is one large ditch or divided into

cells, north and south. In all future status reports, provide a figure that depicts the referenced standpipe sumps and retention ditch in relation to the areas where hydrocarbon seepage occurred.

**Comment 3**

In the *Activities Conducted During Third Quarter 2018* Section, the Permittee states, “[t]he increase in [SPH] recovery [from 208 gallons in the first quarter to 658 gallons] during the third quarter could possibly be attributed the fact that no recovery was conducted during the second quarter, thus allowing more SPH to accumulate in the subsurface adjacent to the retention ditch. The volume of water recovered was lower in the third quarter [25,442 gallons] compared to the first quarter, when approximately 31, 972 gallons were recovered.” SPH is retained within the ditch and removed periodically; however, some portion of the retained water flows back into the subsurface. Evaluate whether the retained water in contact with accumulated SPH potentially further degrades groundwater quality downgradient of the retention ditch in a response letter.

**Comment 4**

The table presenting recovery records from the standpipes indicates that no SPH were recovered between June 12, 2018 and the end of the 2018 third quarter. Evaluate whether fluid recovery from the standpipes is still a viable approach to recover SPH. If appropriate, propose to cease fluid recovery from the standpipes and to implement a more effective approach to recover SPH in the vicinity of the hydrocarbon seep areas in the response letter.

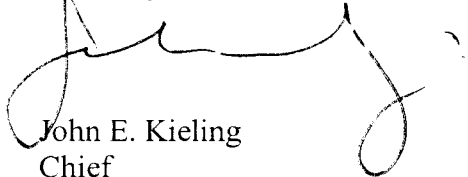
The Permittee must address all comments in this Approval with Modifications and submit a response letter no later than **March 8, 2019**.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information or every statement presented in the document.

Mr. Moore  
February 7, 2019  
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If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-476-6059.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Kieling". The signature is fluid and cursive, with a large loop at the end.

John E. Kieling  
Chief  
Hazardous Waste Bureau

cc: K. Van Horn, NMED HWB  
D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
C. Chavez, OCD  
L. King, EPA Region 6  
B. Moore, WRG

File: Reading File and WRG 2019 File  
HWB-WRG-18-017