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ENTERED

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 7, 2019

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

**RE: APPROVAL WITH MODIFICATIONS
[REVISED] INVESTIGATION WORK PLAN UP-GRADIENT MKTF WELLS
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-18-011**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *[Revised] Investigation Work Plan Up-Gradient MKTF Wells* (Work Plan), dated January 2019, 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 response to NMED’s *Disapproval* Comment 4, the Permittee states, “[t]he requested discussion [regarding the implications of installing groundwater monitoring wells closer to the process area] has been added to Section 4.1, page 4-1.” Section 4.1, *Plume Delineation*, page 4-1, states that while these two wells will provide additional control up-gradient of the truck loading rack and the location where the process sewer line was leaking, it is possible that any detections in these wells may not be associated with the truck loading rack or process sewer line. It may not be possible to delineate the plume as there are multiple source areas and widespread contamination evident in this area. However, by installing additional wells the Permittee may be able to better identify plume migration and potential separate phase hydrocarbon saturation so

that future remediation plans may be designed. If the source of potential detections is not the truck loading rack or process sewer line, the Permittee must evaluate for other potential sources and implement source control measures as appropriate.

Comment 2

In the response to NMED's *Disapproval* Comment 9, the Permittee states, "[i]n [an] attempt to address this comment, additional text has been added to Section 4 (page 4-3) to describe how screen intervals are selected after the soil bo[r]ing has been drilled and logged." Section 4.2.1, *Drilling Activities*, page 4-3, states that slotted (0.01 inch) PVC well screen will be placed in the borings and will extend for 10 feet, unless a longer screen length is necessary to screen across all saturated and likely transmissive zones while also extending above the static water level in the well. In order to accommodate the decreasing trend of groundwater elevations in recent years, a longer screened interval (e.g., 20-foot screen) may be more appropriate for the proposed wells. No revision is required.

Comment 3

In the response to NMED's *Disapproval* Comment 10, the Permittee states, "[t]he only reason the Work Plan includes the collection of soil samples is because NMED directed us to collect soil samples from all soil borings we complete in this area... If we are not required to collect soil samples from borings installed for the primary purpose of well installations, then please inform us and the reference to collection of soil samples will be removed." NMED's comment required clarification as to whether soil samples will be collected since it was not clear from the text. The Permittee must collect soil samples for laboratory analysis in all groundwater well installations in order to collect data that may provide essential information regarding the investigation.

Comment 4

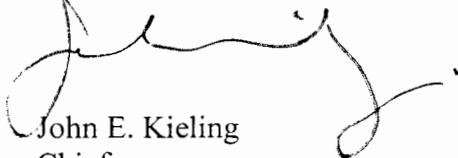
In the response to NMED's *Disapproval* Comment 13, the Permittee states, "[t]he fluid level measurements in Table 2 have been updated to include the most recent measurements completed through the end of 2018." Some MKTF wells in the vicinity of the Sanitary Lagoon exhibit a noticeable decrease in groundwater levels according to Table 2. For example, the depth-to-water (DTW) in well MKTF-25 was recorded as 11.20 feet below ground surface (bgs) during the first quarter of 2018 while DTW was measured at 13.35 feet bgs during the fourth quarter of 2018. In a response letter, provide an exact date when the outfall to the Sanitary Lagoon was plugged and discuss any implications of decreased fluid levels in the vicinity of the Sanitary Lagoon.

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The Permittee must address all comments in this Approval with Modifications and submit a response letter no later than **May 3, 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.

Sincerely,



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

File: Reading File and WRG 2019 File
HWB-WRG-18-011