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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

March 22, 2019

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

**RE: APPROVAL WITH MODIFICATIONS
RESPONSE TO APPROVAL WITH MODIFICATIONS
HYDROCARBON SEEP INTERIM MEASURES 2018 3RD 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 *Response to Approval with Modifications Hydrocarbon Seep Interim Measures 2018 3rd Quarter Status Report* (Response), dated February 21, 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). The NMED hereby issues this Approval with Modifications. The Permittee must address the following comments.

Comment 1

The Permittee’s response to NMED’s Comment 3 states, “[s]ince the water and hydrocarbon that accumulate in the retention ditches are comingled prior to accumulating in the ditches, it is unlikely that additional impact to the shallow water occurs within the ditches and is then conveyed to the subsurface.” The behavior of separate phase hydrocarbon (SPH) in the subsurface environment and surface water is different. The statement is subject to verification. If the accumulated SPH contains miscible constituents, the groundwater quality downgradient of the retention ditches may potentially degrade. For example, Figure 17B in the *Annual Ground*

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Water Monitoring Report Gallup Refinery – 2017, dated November 30, 2018, indicates that the MTBE concentrations in groundwater upgradient of the retention ditches are generally lower compared to downgradient of the ditches. Concentrations of less miscible constituents (e.g., BTEX) in groundwater upgradient of the retention ditches are generally higher or relatively consistent. The Permittee must demonstrate that the groundwater quality downgradient of the retention ditches is not adversely affected in the next annual groundwater monitoring report.

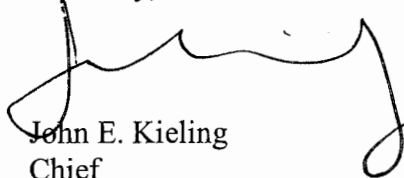
Comment 2

The Permittee's response to NMED's Comment 3 states, "[t]he occurrence of shallow water may be indicative of fresh water leaks associated with plant operations. Efforts are currently under way to evaluate potential source(s) associated with facility operations." Clarify whether the occurrence of shallow water refers to water accumulation in the retention ditches and whether the on-going efforts to evaluate water leaks refers to the investigations associated with the sewer line leaks. Provide a more detailed discussion regarding the on-going efforts in the subsequent status report.

This Approval with Modifications 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.

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

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
B. Moore, WRG

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