



April 26, 2019

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

**Re: Response to Approval with Modifications
[REVISED] INVESTIGATION WORK PLAN OW-58 TWIN WELL
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID# NMD000333211
HWB-WRG-18-005**

Dear Mr. Kieling:

The Marathon Petroleum Company (MPC), Gallup Refinery is submitting the enclosed responses to New Mexico Environmental Department (NMED) comments dated April 12, 2019 on the referenced Investigation Work Plan. If you have any questions or comments, please call Brian Moore at 505-726-9745.

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,
Marathon Petroleum Company LP

Robert S. Hanks
Refinery General Manager

Enclosure

cc K. Van Horn NMED
C. Chavez NMOCD
L. King EPA Region VI
B. Moore Marathon Gallup Refinery

92 Giant Crossing Road
Gallup, NM 87301

RESPONSE TO COMMENTS

April 12, 2019 Comments on Revised Investigation Work Plan OW-58 Twin Well (March 2019)

NMED Comment 1

The Permittee's response to NMED's Comment 3 states, "[h]owever, to provide better coverage in response to the initial request, Western is already planning to collect SPH samples from all existing wells within the tank farm where SPH is present for fingerprint analysis. This information will be provided in the email response that is due May 7, 2019 pursuant to the aforementioned comments no. 5 and 11." NMED concurs with the Permittee's proposal.

Gallup Response: None required.

NMED Comment 2

The Permittee's response to NMED's Comment 6 states, "[t]herefore, the need to drill a second shallower well with the screen set across the higher interval where SPH was encountered during drilling." The sentence is incomplete. Revise the statement for clarity in a response letter.

Gallup Response: The original response stated, "Regarding the disappearance of the SPH in 2017, we do not believe the SPH has in fact disappeared but simply it is isolated behind the well casing installed in OW-58. Therefore, the need to drill a second shallower well with the screen set across the higher interval where SPH was encountered during drilling." We were attempting to explain that the well screen in OW-58 was set below the interval where SPH was observed during drilling and thus a second well is necessary with the well screen set higher and directly across the interval where SPH was observed during drilling OW-58.

NMED Comment 3

The Permittee's response to NMED's Comment 8 states, "[o]n page 4-7, Section 4.1 .7, Chemical Analyses, a provision has been added to specify that SPH will be analyzed by SW-846 Method 8015." The purpose of SPH analysis is to identify potential source of release. Therefore, the analytical method must be accurate enough to distinguish fraction of gasoline, diesel and oil range organics at a minimum. It is not clear whether Method 8015 is capable of identifying these three ranges simultaneously. If appropriate, conduct SPH analysis using the methods that can identify its constituents more accurately (e.g., Paraffin, Isoparaffins, Aromatics, Naphthalene, and Olefins - PIANO analysis). Provide a response in the response letter.

Gallup Response: We have discussed the proper analyses with the laboratory and SW-846 Method 8015 is capable of identifying all three ranges (gasoline, diesel, and motor oil) in the SPH samples. In addition, the chromatograms will be available, which can be compared to standards for various fuels types and crude oil.