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**James C. Kenney**  
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Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

May 1, 2019

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

**RE: APPROVAL WITH MODIFICATIONS  
INTERIM GROUNDWATER RECOVERY SYSTEM WORK PLAN  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-19-006**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Interim Groundwater Recovery System Work Plan* (Work Plan), dated March 26, 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 in a response letter.

**Comment 1**

In the first paragraph of the Work Plan, the Permittee states, “[t]his system will be operated on an interim, seasonal basis to address groundwater impacts at the site until such time as an engineered system can be presented to the NMED for review and approval.” In the March 20, 2019 meeting between the Permittee and NMED, the Permittee stated that the recovery system will also address the increasing groundwater elevation in the area. The Work Plan does not discuss this. In the response letter, state the secondary purpose of the groundwater recovery system.

**Comment 2**

In the section titled “Proposed Location of Initial Recovery Wells”, the Permittee states, “[t]he initial proposed recovery system will consist of recovery wells RW-1, RW-2, RW-5, RW-6, and monitoring wells OW-14, OW-58, OW-30, and OW-55.” The screened intervals of some wells are submerged below the water table (RW-2, OW-14, OW-30 and OW-58); therefore, these wells are not suitable to address groundwater impacts. However, the Permittee may extract groundwater from all proposed wells for the purpose of lowering the water level and controlling contaminant migration. During the extraction of groundwater, the inlet of the pneumatic pumps must not be set more than two feet lower than the lowest groundwater level historically recorded. This measure will prevent separate phase hydrocarbon (SPH) from contaminating soils it has not previously impacted. Include the provision in the response letter.

**Comment 3**

Twin well OW-58, with a screen that crosses the water table, was previously proposed to be installed. Once the twin well is complete, the Permittee must use the well to extract groundwater. Switch extraction from the original well to the new well. Include the provision in the response letter.

**Comment 4**

Well OW-55 is located further north of the source area. Presumably, well OW-55 is included to address the increasing water levels and to prevent acceleration of further contaminant migration in that direction. Well OW-57 is located closer to production well PW-3 and the water level in the well is increasing. Groundwater extraction from well OW-57 may more effectively reduce contaminant migration. Groundwater must also be extracted from well OW-57 or provide justification for not extracting groundwater from well OW-57 in the response letter.

**Comment 5**

In the section titled “Proposed Recovery Well Design”, the Permittee states, “[e]ach recovery well will be operated as an independent, closed system.” The proposed remediation is limited to the northeast quadrant of the refinery. However, the same recovery system may be proposed in other areas of the refinery where SPH is persistently present (e.g., GWM-1, NAPIS-1 and MKTF wells) since each recovery system is independently operated and appears portable. In the future, evaluate the applicability of the proposed remedial approach in other areas of the refinery.

**Comment 6**

The inlet of the pneumatic pump must not be set more than two feet lower than the lowest groundwater level recorded in each well (see Comment 2). Provide a table showing all proposed recovery wells with the depths to pump inlet, screened intervals, and the most current and the lowest recorded SPH/groundwater levels in the response letter.

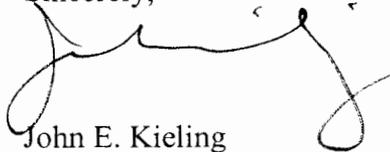
Mr. Moore  
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The Permittee must address all comments in this Approval with Modifications and submit a response letter. The response letter must be submitted to NMED no later than **June 14, 2019**. The first quarterly report must be submitted to NMED no later than three months after the recovery system startup. The Permittee must notify NMED 20 days prior to the system startup.

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.

If you have questions regarding this Approval with Modifications, 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 initial "J" and "K".

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 (6LCRRC)  
B. Moore, WRG

File: Reading File and WRG 2019 File  
HWB-WRG-19-006