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**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

May 29, 2019

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

**RE: APPROVAL  
HYDROCARBON SEEP INTERIM MEASURES 2019 1<sup>ST</sup> QUARTER STATUS  
REPORT  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-19-010**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Hydrocarbon Seep Interim Measures 2019 1<sup>st</sup> Quarter Status Report* (Report), dated April 30, 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee).

In accordance with NMED's *Disapproval Interim Measures Report Hydrocarbon Seep Area*, dated April 26, 2016, the Permittee implemented source control measures by extracting groundwater and separate phase hydrocarbon (SPH) from the standpipe sumps and recovery trench during the first quarter of 2019. The Permittee reported that the recovered volumes were reduced to approximately half of those reported during the fourth quarter of 2018. However, the percentage of SPH recovered during this quarter remained similar with that of previous event.

The Permittee proposes to continue current recovery operations at the standpipe sumps and the retention ditch as a source control measure during the second quarter of 2019.

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Since the efficiency of SPH recovery is consistent between the fourth quarter of 2018 and the first quarter of 2019, NMED concurs with the continuation of current groundwater and SPH recovery operations during the second quarter of 2019.

In the section summarizing the activities conducted during first quarter 2019, the Permittee states, "leaks in the reverse osmosis reject water line were identified. This line transmits approximately 45 gallons per minute (gpm) of reject from the Boiler House area (near potable water well PW-3) to evaporation pond number 9 (Pond-9). To ensure all leaks are addressed, the entire section of pipeline has been removed from service and a new temporary line is now handling this flow pending repair of the original pipeline." NMED was not aware that the reverse osmosis (RO) reject water was directly discharged into Pond EP-9; the Permittee previously stated that RO reject water was directed to evaporation pond 2 (EP-2). The RO reject water must be sampled if it is directly discharged to Pond EP-9. Include the provision in the 2019 Facility-Wide Groundwater Monitoring Plan 2019 update, as necessary. Additionally, provide a map that presents locations of the pipeline that carries the reject water and point(s) where leaks along the pipeline were detected. Furthermore, include the information regarding (1) the depth of the pipeline, (2) the difference between RO reject water and boiler water which is described in the 2018 Facility-Wide Groundwater Monitoring Plan and identified as no longer in service, and (3) history of the discharge directly to Pond-9 in a response letter. The map and response letter must be submitted no later than **July 18, 2019**.

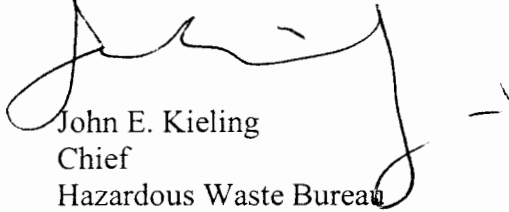
The Permittee has fulfilled its obligation to implement source control measures and submit a quarterly report to NMED. The Permittee must continue to implement source control measures at the site and submit quarterly status reports to NMED at the end of the second quarter of 2019. The 2019 second quarter status report is due no later than **July 31, 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.

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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  
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C. Chavez, OCD  
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File: Reading File and WRG 2019 File