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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 4, 2019

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

**RE: RESPONSE TO COMMENT NO. 39 ON 2017 ANNUAL GROUND WATER
MONITORING REPORT (DATED MARCH 21, 2019)
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-18-014**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Comment 39 on 2017 Annual Ground Water Monitoring Report (dated March 21, 2019)* (Response), dated May 23, 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee).

NMED's Comment 39 requires the Permittee to submit a work plan for an investigation regarding the source of separate petroleum hydrocarbon (SPH) in well NAPIS-1. The Response states, "[a] work plan was not prepared for review by the agencies as time was critical to identify any on-going releases." The Permittee implemented emergency investigations to identify the source of an active SPH leak; however, the source was not identified through the investigations. As part of the voluntary investigations, six soil borings were drilled within and near the tank farm to identify the presence of SPH, five of which were later completed as permanent monitoring wells (OW-61 through OW-65). The Permittee should have communicated with NMED prior to the installation of these borings and wells. The Permittee must submit a report that documents the locations of excavations, underground piping and provide the soil and

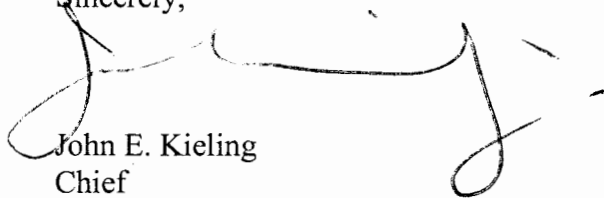
Mr. Moore
June 4, 2019
Page 2

groundwater analytical results, boring logs and well construction diagrams associated with the emergency response to NMED no later than **August 1, 2019**.

The Response further states, “[w]e propose to postpone any further wells in this area pending the results of the nearby well proposed in the *Investigation Work Plan Up-Gradient MKTF Wells* (January 2019).” NMED’s *Approval with Modifications for the Investigation Work Plan Up-Gradient MKTF Wells*, dated March 7, 2019, requires a response letter to be submitted by May 3, 2019. However, neither the response letter or extension request letter was submitted by the due date. The response letter must be submitted to NMED no later than **June 28, 2019**. In addition, the statement indicates that the field work proposed in the *Investigation Work Plan Up-Gradient MKTF Wells* has already been executed. The investigation report must include the recommendation to further investigate the source of active SPH leak in the area. The investigation report must be submitted to NMED no later than **October 1, 2019**.

If you have questions regarding this correspondence, 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 (6LCRRC)
B. Moore, WRG

File: Reading File and WRG 2019 File