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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 6, 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 DISAPPROVAL (RESPONSE TO APPROVAL WITH
MODIFICATIONS MAY 1, 2019) 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 *Response to Disapproval (Response to Approval with Modifications May 1, 2019) Interim Groundwater Recovery System Work Plan* (Response), dated June 24, 2019, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee).

The Response did not adequately address NMED's May 29, 2019 Disapproval comments; however, because soil and groundwater are already affected by contaminants in the area proposed for the interim groundwater recovery system and the Permittee's plan will likely not adversely affect conditions, the Permittee may proceed with the proposed groundwater recovery system.

The Permittee must address the following comments in the interim measures status reports and the final interim measure report. Any changes to the system or the wells used as recovery wells must be reported to NMED prior to modifying the approved plan.

Comment 1

The Permittee's response to NMED's Disapproval Comment 3 states, "[i]f the pump is placed within the upper four feet of the water column in the proposed recovery wells, dissolved phase contaminants (i.e., benzene at over 30 ppm in recovery wells 1 and 2) will be allowed to migrate unabated toward the property line. Additionally, if the concern is that free product would impact intervals where it has not previously been reported, it is worth noting that the free product is only present at the current depths because of the water the facility is losing from leaks and potentially from water well PW-3. As the leaks have caused water levels to rise, free product has been liberated and has migrated upward through sediments and into the water column. So, dissolved contaminants and LNAPLs have already impacted the deeper sediments in the area prior to rising water levels and limiting the recovery of only skimming product from the upper four feet of the water column will not change that." In the first interim measures status report present a summary table that contains the historic groundwater data (one measurement for each year 2009 through the present), the screened intervals, total depth of the wells, and the recorded phase separated hydrocarbon thickness for each well. If a water leak is the cause of the increased groundwater elevations, and the issue is resolved, a decrease in groundwater elevation will likely increase the effectiveness of SPH recovery. Present and discuss any actions taken to address active leaks in the interim measures status reports.

Comment 2

The Permittee's response to NMED's Disapproval Comment 6 states, "[w]ell OW-55 has higher concentrations of benzene and naphthalene than OW-29 and is, therefore, a higher priority pumping location for initial recovery efforts." The Permittee's response to NMED's Approval with Modifications Comment 4 states, "[t]he overriding factor in well selection for these wells was boundary control." NMED's Disapproval Comment 6 stated, "OW-55 is not close to the eastern boundary of the facility. There are other wells (e.g., OW-29) that are closer to the eastern boundary." The Permittee's selection of the proposed wells is not consistent with the stated purpose of the proposed groundwater extraction. If boundary control is the main purpose of the groundwater extraction, well OW-55 will not provide effective boundary control; well OW-29 would be more suitable for the purpose of boundary control and must be considered for future recovery efforts.

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

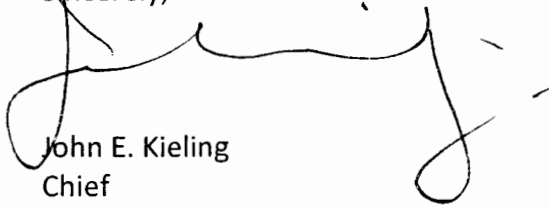
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does not constitute agreement with all information or every statement presented in the document.

The Permittee must notify NMED no less than 20 days prior to system start up. The first interim status report must be submitted to NMED no later than three months after the recovery system start up.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'John E. Kieling', with a large, stylized flourish extending to the right.

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