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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

November 15, 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 SECOND DISAPPROVAL WORK PLAN 2015 ANNUAL GROUNDWATER  
REPORT COMMENTS  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-18-012**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Second Disapproval Work Plan 2015 Annual Groundwater Report Comments* (Response), dated October 25, 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 provided by NMED:

**Comment 1**

The Permittee's response to NMED's *Disapproval Comment 6* states, "[t]he comment is acknowledged and MPC understands the current focus is on delineation." Comment 1 in NMED's *Disapproval Annual Groundwater Monitoring Report: Gallup Refinery – 2017*, dated March 21, 2019 states, "[p]ropose to submit a work plan to investigate the extent of the contaminant migration in the Sonsela west of well OW-1 [by installing three sets of nested wells 1,500 feet, 2,000 feet and 2,500 feet west of pond EP-9] in a response letter." As a reminder,

the response letter was due on **November 8, 2019**. Section 4.2 (New Sonsela Wells) states, “[t]o delineate the down-gradient extent of the plume detected at OW-1, a new Sonsela well will be installed approximately five hundred feet down-gradient to the west of OW-1. The proposed location is shown on Figure 3.” Figure 3 (Proposed Monitoring Well Locations) does not depict the proposed well. Figure 4 (MKTF Well Locations) may be the pertinent figure. Provide a clarification in a response letter. In addition, the proposed location and number of wells to be installed west of OW-1 is not consistent with the NMED’s direction provided by Comment 1 of the March 21, 2019 *Disapproval*. Revise the Work Plan to be consistent with the direction or provide a justification for the proposed location and the reduced number of well installations in the response letter.

### **Comment 2**

The Permittee’s response to NMED’s *Disapproval* Comment 10, states, “[t]he well screen and overlying sand pack in MKTF-17 extends from the 12 feet to 25 feet bgl, providing hydraulic connection to the saturated interval from 20 to 23 feet bgl, but not to the saturation encountered in the overlying fill materials.” According to the MKTF-17 boring log, the observation of “saturated” and “damp” was likely caused by the difference in the grain size of soils. There is a clay-bearing layer that slows groundwater flow but does not prevent it; it does not appear that confining conditions exist. In order to ensure that the proposed wells adjacent to the MKTF wells produce water, the Permittee must propose to install temporary wells at the locations adjacent to the MKTF wells with screen depths to ten feet bgs as proposed. If the temporary wells produce water, they may be converted to permanent wells. If the temporary wells do not produce water, the Permittee must propose to install the wells with comparable depths to the original wells, but with longer well screens that intersect the water table. Propose the temporary wells in the response letter.

### **Comment 3**

The Permittee’s response to NMED’s *Disapproval* Comment 10, states, “[w]e do not think it is advisable to install wells as instructed by NMED that will breach the existing clay aquitard to allow a direct conduit for impacts in the fill materials to migrate directly into the lower interval.” If borings and wells are installed properly, there is very little chance that the wells will create a conduit. No response required.

### **Comment 4**

Section 4.3 is titled as “New Shallow Wells near EP-9 and West of OW-1”. Section 4.3 discusses details for how the proposed shallow monitoring well south of pond EP-9 is installed; however, the section does not include a discussion of the proposed well west of OW-1. Include the discussion and provide a replacement page.

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**Comment 5**

Figure 4 (MKTf Well Locations) depicts a new well location west of well OW-1. According to the legend in Figure 3 (Proposed Monitoring Well Locations), the new well is a proposed Alluvium/Chinle well rather than Sonsela well. However, the new well is proposed to be installed across the Sonsela. Use the same legend included in Figure 3 and revise Figure 4. Provide a replacement figure in the Work Plan.

The Permittee must address all comments in this Approval with Modifications and submit a response letter with replacement pages no later than **December 31, 2019**. In addition, the Permittee must submit an electronic version of the revised Work Plan, as well as an electronic redline-strikeout version of the revised Work Plan showing all changes that have been made to the Work Plan. Two copies of all submittals must be provided (e.g., two copies of the response letter, two copies of the replacement pages, two discs with the electronic versions).

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 letter, please contact Kristen Van Horn of my staff at 505-476-6046.

Sincerely,



Dave Cobrain  
Program Manager  
Hazardous Waste Bureau

cc: K. Van Horn, 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-18-012