



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

**Hazardous Waste Bureau**

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6313  
Phone (505) 476-6000 Fax (505) 476-6030  
[www.env.nm.gov](http://www.env.nm.gov)

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

January 30, 2020

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

**RE: RESPONSE TO APPROVAL WITH MODIFICATIONS  
REVISED INVESTIGATION REPORT OW-14 SOURCE AREA  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-19-002**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Revised Investigation Report OW-14 Source Area* (Response), dated December 10, 2019 and submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). The Permittee must address the following comment.

In the response to NMED's *Approval with Modifications* Comment 3, the Permittee states, "[i]nstead of taking a somewhat 'piecemeal' approach of attempting to extend select maps or cross sections from one area of investigation to include portions or all of the adjacent areas of investigation, it would be a significant improvement to have one report for SMWU No. 6 that includes all three of the areas discussed above, which are all impacted by releases at SWMU No. 6." The referenced investigation associated with SWMU No. 6 has three parts: (1) MTBE plume northeast of SWMU No. 6, (2) source area and hydrocarbon plume east side of SWMU No. 6, and (3) hydrocarbon plume in the vicinity of the north drainage ditch. Each investigation focuses on separate areas; therefore, it is more appropriate to conduct the investigations

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separately. In addition, there are other potential releases associated with SWMU No. 6 (e.g., separate-phase hydrocarbons in the STP-1 French Drain). One report that covers all of the investigations associated with SWMU No. 6 is not likely to be practical or inclusive and will likely lack necessary details. The Permittee may submit a comprehensive SWMU No. 6 report that provides an analysis of subsurface and groundwater conditions within SWMU No. 6 and its adjacent areas and an overview of each investigation, if deemed appropriate. However, that report will not replace each separate investigation report. No response required.

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 Michiya Suzuki of my staff at 505-476-6059.

Sincerely,



Kevin Pierard  
Chief  
Hazardous Waste Bureau

cc: 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 2020 File  
HWB-WRG-19-002