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CERTIFIED MAIL - RETURN RECEIPT REQUESTED



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James C. Kenney
Cabinet Secretary

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Deputy Secretary

APR 03 2020

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 FOURTH QUARTER STATUS REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-20-005**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Hydrocarbon Seep Interim Measures 2019 Fourth Quarter Status Report* (Report), dated February 5, 2020, 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 third quarter of 2019.

The recovered water volume from the standpipe sumps during this quarter was 5,690 gallons which was lower than that of the previous quarter (53,260 gallons) presumably because of inoperable conditions caused by cold temperatures. Similarly, the recovered water volume from the retention ditch during this quarter was 1,800 gallons that was lower than that of the

previous quarter (12,651 gallons). The recovered SPH volume from the retention ditch during this quarter proportionally decreased from 245 to 25 gallons. As the temperature warms, the recovery volumes are expected to return to previously observed ranges.

The correlation between the water levels in nearby wells and hydrocarbon recovery rates is discussed in the Report. The Permittee suggests continuing to monitor the correlation, including the evaluation of influence caused by the potential leak from well PW-3. The water levels and recovery volumes may decrease if PW-3 is a source of groundwater and is repaired. The discussion must be included in future status reports.

The Permittee proposes to continue current recovery operations at the standpipe sumps and the retention ditch as a source control measure during the first quarter of 2020. NMED concurs with continuation of the current operations. The Permittee also suggests that the operations may be adjusted to capture the gasoline released from the Marketing Tank Farm in October 2019. If such adjustment or optimization is deemed necessary, the Permittee must contact NMED to discuss the details prior to the implementation.

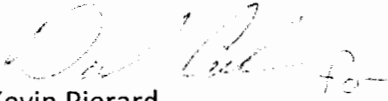
The Permittee has fulfilled its obligation to implement source control measures and submit a quarterly report to NMED. The Permittee must continue to implement source control measures at the site and submit quarterly status reports to NMED. The 2020 first quarter status report must be submitted no later than **May 29, 2020**.

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.

Mr. Moore
2019 4th Quarter Status Report
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If you have questions regarding this letter, please contact Michiya Suzuki of my staff at 505-476-6046.

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-20-005