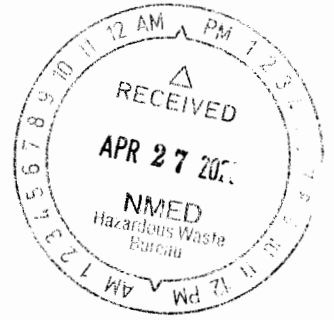




**Marathon
Petroleum Company LP**



April 17, 2020

Mr. Kevin Pierard, Chief
New Mexico Environmental Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505-6303

**RE: Second Response to Approval with Modifications
2017 Annual Groundwater Monitoring Report
Marathon Petroleum Company LP, Gallup Refinery
(dba Western Refining Southwest, Inc.)
EPA ID# NMD000333211
HWB-WRG-18-014**

Dear Mr. Pierard:

Gallup Refinery is submitting the enclosed response to comments received from NMED on January 29, 2020 regarding Marathon Petroleum Company's (MPC) previous response to NMED's Approval with Modifications of the referenced Annual Groundwater Monitoring Report. If there are any questions, please call Brian Moore at 505-726-9745.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,
Marathon Petroleum Company LP, Gallup Refinery

Robert S. Hanks

Robert S. Hanks
Refinery General Manager

Enclosure

cc D. Cobrain NMED
C. Chavez NMOCD
B. Moore Marathon Gallup Refinery

RESPONSE TO COMMENTS

January 29, 2020 Approval with Modifications, Response to Approval with Modifications 2017 Annual Groundwater Monitoring Report Gallup Refinery (June 2019)

NMED Comment 1:

NMED's Approval with Modifications Comment 3 states, "[t]he NMED's *Screening Guidance for Human Health Risk Assessments* (Guidance) was updated on February 2019 and the groundwater screening level for unknown oil was revised as 85.8 µg/L. Accordingly, use the updated screening level for DRO and GRO for future reports and work plans." The groundwater screening level for unknown oil was increased from 0.0398 mg/L to 0.0858 mg/L and a groundwater screening level for gasoline (0.0101 mg/L) was established in the 2019 Guidance. The Report is not required to be revised at this time. However, the Permittee must include the groundwater screening level of 0.0101 mg/L for TPH-GRO in all future reports and work plans.

MPC Response 1:

The comment is acknowledged and the new groundwater screening level will be used in future reports and work plans.

NMED Comment 2:

The Permittee's response to NMED's Approval with Modifications Comment 4, Item a, states, "[w]ells OW-61 through OW-65 were installed in 2018 and a separate Well Installation Report has been prepared as requested." The referenced report will be reviewed as a separate submittal. Comments pertaining to the well installations are not included in this correspondence.

MPC Response 2:

The comment is acknowledged.

NMED Comment 3:

The Permittee's response to NMED's Approval with Modifications Comment 4, Item b, states, "[t]he pumps were placed into operation upon receiving NMED's approval on August 6, 2019. However, problems with automated shutoff valves delayed full operation of the pumps and prevented us from completing any useful recovery tests before the pumps had to be removed from service due to freezing temperatures." The Permittee must submit an interim status report no later than 90 days after the recovery system start up. Include the test results in the interim status report.

MPC Response 3:

The comment is acknowledged.

NMED Comment 4:

The Permittee's response to NMED's Approval with Modifications Comment 4, Item d, states, "[o]n the morning of October 21st, 0.19 feet of SPH was measured in GWM-1 and approximately eight ounces of product [were] removed with a bailer. The fluid levels were measured through the afternoon of October 21st with only 0.02' recovering to the well. By the end of the second day, the product thickness had returned to 0.19'." SPH is persistent in the vicinity of GWM-1. SPH may be migrating downgradient from the aeration lagoons. The downgradient extent of the SPH must be delineated. The Permittee proposed to install a monitoring well halfway between the eastern perimeter of pond EP-2 and well GWM-1 in the *Investigation Work Plan SMW-1 [sic] and GMW-1*

[sic] Areas, dated September 2018. Provide information regarding the current status of the investigation in a response letter.

MPC Response 4:

The referenced Investigation Work Plan, which was originally submitted in September 2018 as noted, was revised in August 2019 and resubmitted to NMED on October 1, 2019. A copy of the FedEx delivery receipt is attached. The Work Plan has not been implemented yet, pending review and approval by NMED.

NMED Comment 5:

The Permittee's response to NMED's Approval with Modifications Comment 7 states, "[t]he values in Table 2.1 are correctly labelled and are reported in% dissolved oxygen, which is the units used at the time the measurements were recorded in 2017." The instrument used to collect the dissolved oxygen data was YSI Model 556 MPS Multi Probe System according to the 2017 Report. The manual for the instrument shows the reporting unit for DO readings as mg/L, rather than %DO. Regardless, all future DO data must be reported as mg/L, rather than %DO.

MPC Response 5:

The comment is acknowledged.

NMED Comment 6:

The Permittee's response to NMED's Approval with Modifications Comment 15 states, "MPC desires to submit the discussion in a separate submittal, as NMED notes, the evaluation of natural attenuation of chlorinated solvents pertains to a much larger area than just in the immediate vicinity of OW-10." NMED concurs with the Permittee's response. In the response letter, provide the date when the discussion will be submitted to NMED.

MPC Response 6:

The evaluation of natural attenuation is anticipated to be completed by June 30, 2020 and it is anticipated the report will be submitted in July 2020.

NMED Comment 7:

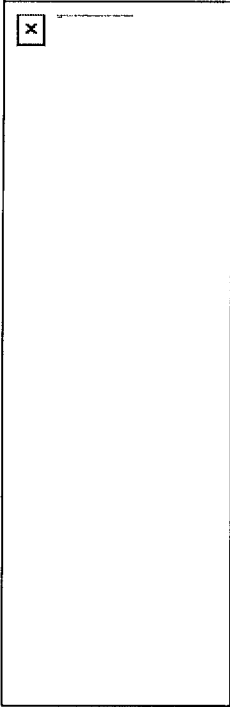
The Permittee's response to NMED's Approval with Modifications Comment 17 states, "[t]he relationship between %DO and Mg/l is complex involving barometric pressure, salinity and temperature. We refer you to the United States Geological Survey's website for possible methods to make such corrections if NMED desires to pursue this further; <https://water.usgs.gov/admin/memo/QW/qw81.11.html> and <https://water.usgs.gov/admin/memo/QW/qw81.15.html>." The referenced websites do not provide the explanation for the relationship between %DO and mg/L. All future DO data must be reported as mg/L, rather than %DO (see Comment 5).

MPC Response 7:

The comment is acknowledged.

Allie Sheftall

From: TrackingUpdates@fedex.com
Sent: Tuesday, October 1, 2019 10:33 AM
To: Allie Sheftall
Subject: FedEx Shipment 776374569927 Delivered

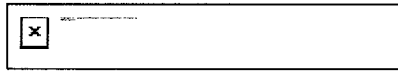


Your package has been delivered

Tracking # 776374569927

Ship date:
Mon, 9/30/2019
Scott Crouch
DiSorbo Consulting
AUSTIN, TX 78759
US

Delivery date:
Tue, 10/1/2019 9:29 am
John Kieling, Chief
NM Environment Dept Haz
Waste Burea
2905 Rodeo Park Drive East
Bldg 1
SANTA FE, NM 87505
US



Delivered

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number: 776374569927

Status: Delivered: 10/01/2019 09:29 AM
Signed for By: M.JUAREZ

Reference: WEST19039: SMW-2/Boundary Well

Signed for by: M.JUAREZ

Delivery location: SANTA FE, NM

Delivered to: Receptionist/Front Desk

Service type: FedEx Priority Overnight®

Packaging type: Your Packaging

Number of pieces: 1

Weight: 10.00 lb.

Special handling/Services: Deliver Weekday

Standard transit: 10/1/2019 by 10:30 am