



Western Refining Southwest, Inc.

A subsidiary of Marathon Petroleum Corporation

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Jamestown, NM 87347
Tel: 505.722.3833

444 - 4 2020

April 28, 2020

Mr. Carl J. Chavez
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
Santa Fe, New Mexico 87505

**RE: RE: Request for Closure, Central Oil Conservation Division Landfarm
Marathon Petroleum Company LP, Gallup Refinery
EPA ID# NMD000333211**

Dear Mr. Chavez:

The Marathon Petroleum Company LP (MPC) Gallup Refinery (Refinery) is submitting this correspondence to the Oil Conservation Division (OCD) to request closure of the Central OCD Landfarm (Landfarm) and to clarify requests made by OCD on March 24, 2020. As concluded in the *OCD Landfarm Closure Request* letter of January 16, 2020, the Refinery does not believe that the referenced chloride exceedances are the result of Landfarm operation. Accordingly, the Refinery does not believe that the chloride exceedances and investigation of Pond 10 need to be addressed prior to Landfarm closure as requested in OCD March 24, 2020 correspondence.

MPC received an approval from the New Mexico Environmental Department (NMED) for the *Response to Comments NMED Approval with Modifications Letter Dated March 17, 2017 [Chloride Exceedance Excavation Report]* on May 16, 2019 regarding a previously submitted report. NMED Comment 2, in that approval, states that "a work plan to install soil borings to collect soil samples of the underlying native soils, pond sediments, and the upper zone waste" needs to be submitted but no due date was stated in the letter.

OCD, in a March 24, 2020 email, agreed with the findings of the OCD Landfarm Closure Plan Report, but preferred "to await the results of the deeper environmental investigation of former Evaporation Pond 10" requested by NMED in the above-referenced Approval Letter. As stated above, Pond 10 which lies within the footprint of the Landfarm, will be investigated when MPC deems the Landfarm is accessible per the RCRA permit. MPC considers that the Landfarm is not accessible in part because the OCD Landfarm is not closed.

Therefore, MPC is requesting that the OCD formally grant MPC closure of the Central OCD Landfarm. If OCD believes that insufficient information is available for Landfarm closure, MPC will work with OCD to

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develop a workplan and sampling program to address their concerns. In addition, MPC will include OCD on any communications with NMED related to the Pond 10 investigation.

Upon OCD approval of this request, the Refinery shall proceed with closure in general accordance with NMAC Rule 36 and the submittal of Form C-137 EZ and its requirements. If you have any questions or comments, please do not hesitate to 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

cc D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
B. Moore, Marathon Gallup Refinery
H. Jones, Trihydro Corporation