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NEW MEXICO ENVIRONMENT DEPARTMENT **ENTERED**

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James C. Kenney
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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

MAY 26 2020

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

**RE: RESPONSE TO COMMENTS JANUARY 29, 2020 APPROVAL WITH MODIFICATIONS
OW-61 THROUGH OW-65 WELL INSTALLATION REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-19-020**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Comments January 29, 2020 Approval with Modifications OW-61 through OW-65 Well Installation Report* (Response), dated April 20, 2020 submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). The Permittee must address the following comments.

Comment 1

In the responses to NMED's *Approval with Modifications* Comments 1 and 6, the Permittee states, "at this time the LIF study is still on-going, so final conclusions as to potential sources near STP-1 are not yet available," and "[a]n LIF investigation is being conducted to evaluate potential sources within the tank farm." According to the data collected during 2019, the release may still be on-going. It is critical to investigate the source of SPH in a timely manner to prevent expansion of contamination. With the understanding that the COVID-19 epidemic could influence the schedule, provide an anticipated submittal date for the report that summarizes the result of the LIF study in a response letter.

Comment 2

In the response to NMED's *Approval with Modifications* Comment 4, the Permittee states, "[w]hile there are no tanks in the immediate vicinity [of well OW-61], there is a major pipeline rack adjacent to OW-61 that conveys petroleum hydrocarbons." Petroleum hydrocarbons potentially leaked from the pipeline and may have caused the shallow soil contamination. Evaluate necessity of conducting a shallow soil investigation and propose to submit a work plan to investigate the source of shallow soil contamination in the response letter. If the on-going LIF study will address the issue of shallow soil contamination in the vicinity, provide a clarification in the response letter.

Comment 3

In the response to NMED's *Approval with Modifications* Comment 5, the Permittee states, "[u]pon arriving at this location and finding it was not cleared, it was decided to clear the location manually with a hand auger, which was completed to a depth of five feet." In order to evaluate presence or absence of potential shallow soil contamination (e.g., above 10 feet below ground surface), relevant locations must be cleared manually with a hand auger rather than hydro-excavation. Include the provision in all future investigations that involve potential shallow soil investigation.

The Permittee must address all comments in this letter and submit a response letter no later than **December 31, 2020**.

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: WRG 2020 and Reading