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James C. Kenney
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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 31, 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 FACILITY WIDE GROUND WATER
MONITORING WORK PLAN – UPDATES FOR 2019
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-19-012**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Approval with Modifications Facility Wide Ground Water Monitoring Work Plan – Updates for 2019* (Response), dated February 25, 2020 submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). The Permittee must address the following comment.

Comment 1

The Permittee's response to NMED's Approval with Modifications Comment 1 states, "[the issue associated with the direct discharge of the RO reject water] was previously addressed in a letter dated November 12, 2019." The Permittee's response to NMED's Comment 3 in the November 12, 2019 letter (*Hydrocarbon Seep Interim Measures 2019 Second Quarter Status Report*) states, "[t]he State of New Mexico has been aware of the discharge of the RO Reject to Pond 2 for some time. The Annual Groundwater Reports that are submitted to the NMED and

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OCD contain data tables that summarize “general chemistry” of the pond water that includes a discussion of chlorides. Re-routing the RO Reject to Pond-9 from Pond-2 does not represent a substantial change in that process.” However, New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division (OCD) issued a letter requiring the Permittee to submit a discharge permit application on March 5, 2020. Considering that OCD was aware of the discharge, the basis for the OCD’s directive is presumably not associated with the RO reject water discharge. NMED is not aware of other discharges at the facility except that from STP-1. In a response letter, explain the nature of all on-going surface discharges, if applicable.

The Permittee must address the comment above 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,



Dave Cobrain
Program Manager
Hazardous Waste Bureau

cc: 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-19-012