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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 23, 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 2020 FIRST QUARTER STATUS REPORT
HYDROCARBON SEEP INTERIM MEASURES 2020 SECOND QUARTER STATUS REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-20-015
HWB-WRG-20-016**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Hydrocarbon Seep Interim Measures 2020 First Quarter Status Report* (1st Quarter Report), and *Hydrocarbon Seep Interim Measures 2020 Second Quarter Status Report* (2nd Quarter Report), both dated September 28, 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 was directed to implement source control measures by extracting groundwater and separate phase hydrocarbon (SPH) from the standpipe sumps and recovery trench. However, the Permittee was unable to fully implement the source control measures due to the refinery restrictions (e.g., COVID-19 restrictions) during the first and

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second quarters of 2020. One fluid recovery event was conducted in April 1, 2020 and 3,000 gallons of water was extracted from the standpipe sumps. The reduced frequency of the recovery operations caused water levels to increase in many relevant MKTF wells during the first quarter; however, water levels decreased during the second quarter in most wells due to the result of decreased refinery operations (e.g., idling status). The Permittee proposes to continue to monitor the changes in water levels in the third quarter. However, the frequency of the water level measurements must be increased to biquarterly in order to evaluate potential effects of idling operations. Accordingly, update the 2021 Facility-wide Groundwater Monitoring Work Plan, as appropriate.

In addition, the Permittee proposes to resume the recovery operations at the standpipe sumps and the retention ditch and initiate evaluation of additional or alternative recovery methods to intercept and capture the gasoline released from the vicinity of the Truck Loading Rack in October 2019. NMED concurs with continuation of the current recovery operations; however, if adjustment or optimization is deemed necessary, the Permittee must contact NMED to discuss the details prior to implementation of any changes.

The Permittee has fulfilled its obligation to implement source control measures to the extent practicable and submit quarterly reports to NMED. The Permittee must continue to implement source control measures at the site and submit quarterly status reports to NMED. The 2020 third quarter status report was already submitted to NMED. The 2020 fourth quarter status report must be submitted no later than **February 26, 2021**.

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.

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)

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File: Reading File and WRG 2020 File
HWB-WRG-20-015, HWB-WRG-20-016