



NEW MEXICO
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 10, 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 THIRD QUARTER STATUS REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-20-017**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Hydrocarbon Seep Interim Measures 2020 Third Quarter Status Report* (Report), dated November 2, 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 refinery was placed in indefinite idle as of October 9, 2020 and the Permittee was unable to fully implement the source control measures because refinery resources and personnel were operating at a reduced capacity and focused on the transition to permanent idle during the third quarter. Accordingly, only one fluid recovery event was conducted on September 1, 2020 and 198 gallons of water and two gallons of separate phase hydrocarbon (SPH) were extracted from the retention ditch. No fluid recovery was conducted at

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the standpipes during the third quarter. The reduced frequency of the recovery operations may have caused water levels to increase in many relevant MKTF wells during the third quarter. In the *Activities Planned for the Fourth Quarter 2020* Section, page 2 of 2, the Permittee states that NMED has requested that all groundwater monitoring wells will be gauged monthly and the monthly monitoring will begin in November 2020. The statement is not accurate. NMED directed to increase the gauging frequency biquarterly in order to evaluate potential effects of idling operations. Regardless, proposed monthly gauging is hereby approved for all relevant wells. The Permittee must report the gauging data in future status reports.

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 method. NMED concurs with continuation of the current recovery operations; however, if adjustment is deemed necessary, the Permittee must contact NMED to discuss the details prior to the implementation.

The Permittee has fulfilled its obligation to implement source control measures to the extent practicable and submit a quarterly report to NMED. The Permittee must continue to implement source control measures at the site and submit quarterly status reports including the gauging data from all relevant wells. 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)

File: Reading File and WRG 2020 File