

 **ENTERED**



**Western Refining Southwest, Inc.**

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

December 15, 2020

Mr. Kevin Pierard, Chief  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505



**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. Pierard,

Attached please find the response to the comment contained in the New Mexico Environment Department (NMED) Response to Approval with Modifications Facility Wide Ground Water Monitoring Plan – Updates for 2019.

If you have any questions or comments regarding the information contained herein, please do not hesitate to contact Mr. John Moore of my staff at 505-879-7643.

**Certification**

*I certify under penalty of law that this document and all attachments were prepared under my direction of 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



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### Enclosure

cc: D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
C. Chavez OCD  
L. King, EPA Region 6  
G. McCartney, Marathon Petroleum Company  
J. Moore, Marathon Gallup Refinery  
H. Jones, Trihydro Corporation

**New Mexico Environment Department (NMED) Comments:**

**NMED 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 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.

**Marathon Petroleum Company (MPC) Response 1:**

The refinery is currently idled and the discharge of reverse osmosis (RO) reject water from the Boiler House to the Evaporation Ponds has ceased. Previously, RO reject water was discharged to Pond-9. Last year, due to upgrades in piping the RO reject water was redirected to Pond-6. When the plant first idled in April 2020, all RO reject water was redirected and processed through the wastewater facility, as the wastewater facility needed additional water to function efficiently. Presently, the only water being discharged to the Evaporation Ponds is from STP-1. When the refinery starts up again, NMED will be provided a detailed description of how the RO reject water is discharged at the facility.