



 **ENTERED**

John Moore, P.E.  
Environmental Supervisor  
Gallup Refinery

**Western Refining Southwest, Inc.**

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

December 18, 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 Comments 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. Pierard,

Attached please find the response to comments contained in the New Mexico Environment Department (NMED) Disapproval letter dated May 26, 2020.

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  
Refinery General Manager

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:**

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.

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

March 31, 2021 is the date set for submission of the report summarizing the LIF investigation results. MPC plans to conduct additional LIF investigative field work in early February 2021.

### **NMED 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.

### **MPC Response 2:**

There are several LIF borings in the vicinity of OW-61. Several more locations may be added in the additional LIF investigation. These LIF borings should address the LNAPL found in OW-61 and will be summarized in the March 31, 2021 LIF Investigation Report. Shallow contamination will be delineated using LIF procedures that will be modified in accordance with MPC's response to Comment 3.

**NMED 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.

**MPC Response 3:**

Hand augering in roadways is a difficult and labor-intensive process, especially in areas of compacted road base or gravel fill. As an alternative to hand-augering, MPC proposes using hydro-excavation to clear a V-shaped trench with the boring location within the V, so that the undisturbed shallow soil can be evaluated.