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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 11, 2021

John Moore  
Environmental Superintendent  
Western Refining, Southwest Inc., Gallup Refinery  
92 Giant Crossing Road  
Gallup, New Mexico 87301

**RE: APPROVAL WITH MODIFICATIONS  
RESPONSE TO DISAPPROVAL  
INVESTIGATION WORK PLAN NO. 2 AREA OF CONCERN 35  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-20-009**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Response to Disapproval Investigation Work Plan No. 2 Area of Concern 35* (Response), dated January 4, 2021, submitted on behalf of Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (the Permittee). NMED hereby issues this Approval with Modifications with the following comments.

**Comment 1**

The response to NMED's *Disapproval Comment 1* states, "[t]his comment is acknowledged, and the report has been revised. Figure 6 has been renumbered to Figure 7 to account for additional document revisions." Although the Work Plan appropriately addressed NMED's *Disapproval Comment 1*, the Permittee's response does not identify the sections of the Work Plan where revisions are made to address the comment. For example, NMED's *Disapproval*

Comment 1 states, “[p]ropose to determine the screened interval of well MKTF-45 in the revised Work Plan.” Sections 2.1 and 4.1 of the Work Plan were revised to state, “[a] camera scope that can access the well will be used to determine the screened interval of well MKTF-45,” and “[t]his will be completed using a down hole camera to determine the screened interval.” These statements are appropriate; however, the response does not include these statements. Additionally, NMED’s *Disapproval* Comment 1 states, “propose to install a well at the location of well MKTF-17 to intercept the water table.” Section 4.1 of the Work Plan was revised to state, “[t]he second well will be installed in close proximity to Well MTKF-17. The screened interval of MTKF-17 is submerged below the water table and underestimates the SPH thickness. Therefore, the proposed well will be installed to intercept the water table, which will be more accurate in evaluating SPH thickness.” This statement is also appropriate; however, the response does not include such statement. Furthermore, NMED’s *Disapproval* Comment 1 states, “[r]evise the location of the proposed well to be approximately 100 feet west of well MKTF-17.” Section 4.1 of the Work Plan was revised to state, “[t]he first monitoring well is proposed to be located approximately 100 ft west of MTKF-17.” This statement is necessary in the response even though the response references the relevant figure where the comment is addressed. In all future response to comments letters, each response must include the statements that address the corresponding comment and reference the relevant sections of the document where revisions were made, where applicable. No revisions are required to the Work Plan.

### **Comment 2**

The response to NMED’s *Disapproval* Comment 5 states, “[w]hen SPH is present, a sample will be collected and analyzed to determine the nature of contamination and identify the contaminants potential origin.” Provide the proposed method for SPH analysis to identify the contaminants potential origin. NMED’s *Disapproval* Comment 6 states, “collect SPH samples for fingerprint analysis...” Clarify whether fingerprint analysis (e.g., PIANO Analysis) will be conducted for SPH, if encountered. Provide replacement pages, as appropriate.

### **Comment 3**

The response to NMED’s *Disapproval* Comment 11 states, “[n]itrite analysis will be completed by the laboratory. The revised Work Plan includes the method for analysis.” Section 4.6, *Chemical Analyses*, states that nitrate analysis will be conducted by an off-site laboratory; however, it does not specify the same for nitrite analysis. Clarify that both nitrate and nitrite analysis will be conducted by an off-site laboratory in the revised Work Plan and provide replacement pages.

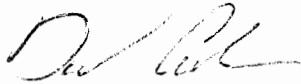
The Permittee must address all comments above and submit a response letter, replacement pages, and an electronic version of the revised Work Plan no later than **May 31, 2021**. This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document

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does not constitute agreement with all information or every statement presented in the document.

If you have questions regarding this Approval with Modifications, please contact Michiya Suzuki of my staff at 505-690-6930.

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 2021 File