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 ENTERED



James C. Kenney  
Cabinet Secretary

Jennifer J. Pruett  
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 4, 2021

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

RE: APPROVAL WITH MODIFICATIONS  
[REVISED] INVESTIGATION WORK PLAN NORTH DRAINAGE DITCH AREA  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-19-009

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *[Revised] Investigation Work Plan North Drainage Ditch Area* (Work Plan), dated September 20, 2019, 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 2* states, "[t]he missing historic borings [01117-B1, 0117-B2, 648, 643, 649, 651, 652, 665, 656, 657, MP-4, MP-5, MP-9, B-1, and B-3] are included in Appendix B..." The boring logs are appropriately included in Appendix B; however, the Work Plan does not include a figure that identifies the location of the borings. Provide a

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figure that identifies the location of the historic borings.

**Comment 2**

The response to NMED's *Disapproval Comment 12* states, "we acknowledge the comment and will take this into consideration during report preparation as to which constituents are included in the data summary tables." Note that NMED's *Disapproval Comment 12* does not allow the Permittee to selectively report detected constituents. All constituents detected above their corresponding detection limits must be identified in the data summary tables of the investigation report.

The Permittee must address the comments in this letter and submit a figure required by Comment 1 no later than **April 1, 2021**. The investigation report that summarizes the results of the investigation must be submitted to NMED no later than **December 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 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 505-476-6046.

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 2021 File