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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 30, 2021

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

**RE: APPROVAL WITH MODIFICATIONS
HYDROCARBON SEEP INTERIM MEASURES 2020 FOURTH QUARTER STATUS REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-21-003**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the *Hydrocarbon Seep Interim Measures 2020 Fourth Quarter Status Report* (Report), dated February 22, 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

In the *Activities conducted during fourth quarter 2020*, paragraph 1, page 1, the Permittee states, “[e]xcept for MKTF-01, the MKTF wells due south and upgradient of the hydrocarbon seep area increased in water level when compared to the third quarter. The greatest increases were in MKTF-3 (1.53 feet [ft]), MKTF-19 (1.45 ft), and MKTF-23 (1.28 ft). Fluid levels tended to decrease southwest, toward the Truck Loading Rack. The greatest decreases were in MKTF-14

(1.01 ft) and MKTF-45 (3.92 ft). All other variations were less than 1 ft.” NMED’s *Approval Hydrocarbon Seep Interim Measures 2020 Third Quarter Status Report*, dated December 10, 2020, approved the proposed monthly gauging for all groundwater monitoring wells and directed the Permittee to report the gauging data in future status reports. The gauging data was not included in the Report. Provide a table that presents the gauging data in the 2021 first quarter status report.

In addition, the refinery was placed in indefinite idle as of October 9, 2020. Accordingly, water levels were expected to decrease in the MKTF wells south and upgradient of the hydrocarbon seep area. In the 2021 first quarter status report, explain potential causes of the water level increases in the area. Furthermore, clarify whether the decrease in water levels in wells MKTF-14 and MKTF-45 was caused by the fluid recovery events conducted in October and December 2020 rather than the idling of the plant in the 2021 first quarter status report.

Comment 2

In the *Activities conducted during fourth quarter 2020*, paragraph 2, page 1, the Permittee states, “[f]luid removal in MKTF wells upgradient of the hydrocarbon seep area, with recoverable SPH, was conducted in October and December of 2020 using a vacuum truck to control product migration. In October, 16.6 gallons of SPH were extracted. In December, 9.53 gallons were extracted.” Provide a table listing all MKTF wells where fluid recovery events were conducted and the gauging data, if available, in the 2021 first quarter status report. If the gauging data was not collected at the time of fluid recovery, the Permittee must gauge fluid levels before and after conducting fluid recovery and when fluid level returns to the baseline condition (e.g., after 24 hours) in the future and report these data in future status reports.

Comment 3

In the *Activities conducted during fourth quarter 2020*, paragraph 4, page 1, the Permittee states, “Marathon submitted a revised workplan and address[ed] NMED’s comments on January 4, 2021.” NMED issued an approval with modifications on February 11, 2021 and required a response letter no later than **May 31, 2021**. This comment serves as a reminder; no revision is required.

Comment 4

In the *Activities conducted during fourth quarter 2020*, paragraph 1, page 2, the Permittee states, “Marathon also continues to evaluate PW-3 to determine if potable water is being lost through casing leaks.” Describe the on-going efforts for the evaluation of well PW-3 in the 2021 first quarter status report.

Comment 5

In the *Activities planned for the first quarter 2021*, paragraph 4, page 2, the Permittee states, “gauging of existing monitoring wells near the Marketing Tank Farm indicates the gasoline is migrating to the north and may spread to the hydrocarbon seep area. Fluid recovery from

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MKTF wells upgradient of the hydrocarbon seep area, with recoverable SPH, will be conducted monthly to help control product migration.” The proposed measure to prevent the gasoline plume migrating north is likely too passive to prevent it from spreading. The source location of the gasoline plume was already identified to be originating from the underground product transfer line on the north side of the Truck loading rack. Therefore, a completion of the investigation required by the *Investigation Work Plan No. 2 Area of Concern 35*, dated February 2020, is not necessary in order to develop remediation strategies to eliminate the source of the gasoline plume. Submit an interim measure work plan to eliminate the source of the gasoline plume no later than **July 30, 2021**.

Comment 6

In the *Activities planned for the first quarter 2021*, paragraph 5, page 2, the Permittee states, “SPH has been detected in MKTF-33.” Explain whether the SPH detected in well MKTF-33 is the same gasoline released from the underground product transfer line on the north side of the Truck loading rack and provide the gauging data collected from well MKTF-33 in the 2021 first quarter status report. If the SPH in well MKTF-33 is determined to be the same gasoline, describe how the determination was made. In this case, the plume is rapidly expanding west as well as north. If it is unknown, propose to identify the origin of the SPH in the response letter required by the NMED’s February 11, 2021 *Approval with Modifications* (see Comment 3).

Furthermore, the Response to *Disapproval Investigation Work Plan No. 2 Area of Concern 35*, dated January 4, 2021, states that the first monitoring well is proposed to be located approximately 100 ft west of MTKF-17, and the work plan was approved by the NMED’s February 11, 2021 *Approval with Modifications*. However, since SPH is now detected in well MKTF-33 located approximately 550 feet west of well MKTF-17, the proposed location of the monitoring well is no longer appropriate. The Permittee must change the proposed location to approximately halfway between wells MKTF-32 and MKTF-33 in order to delineate the SPH plume. Address the change in the response letter required by the NMED’s February 11, 2021 *Approval with Modifications* (see Comment 3).

Comment 7

In the *Activities planned for the first quarter 2021*, paragraph 5, page 2, the Permittee states, “Marathon will conduct the Additional Laser Induced Fluorescence (LIF) Investigation in February 2021 to delineate SPH to the west of the Truck Loading Rack. Additionally, the LIF investigation will include locations along the road south of the Hydrocarbon Seep Area and south of Tank 102 to determine the extent of product migration to the north of the Truck Loading Rack.” Provide a date when the LIF investigation report will be submitted to NMED in the 2021 first quarter status report.

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 the quarterly reports. The 2021 first quarter

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status report that addresses all comments above must be submitted no later than **April 30, 2021**. In addition, a work plan required by Comment 5 must be submitted no later than **July 30, 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
T. McDill, OCD
L. King, EPA Region 6 (6LCRRC)

File: Reading File and WRG 2021 File