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Certified Mail - Return Receipt Requested



July 6, 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 2021 FIRST QUARTER STATUS REPORT  
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY  
EPA ID # NMD000333211  
HWB-WRG-21-009**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) is in receipt of the Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (Permittee) *Hydrocarbon Seep Interim Measures 2021 First Quarter Status Report (Report)*, dated April 29, 2021. NMED has reviewed the Report, and hereby issues this Approval with Modifications with the following comments.

**Comment 1**

In the *Activities conducted during first quarter 2021*, paragraph 1, page 1, the Permittee states, "[i]n general, the MKTF wells directly south of the hydrocarbon seep area showed an increase in water level[s] when compared to the fourth quarter of 2020. MKTF-4 had the greatest increase of 0.8 feet (ft)." According to Table 2A, *Fluid Level Measurements for Wells MKTF-1 through MKTF-50*, page 6 of 18, the depth to water readings collected from well MKTF-14 in December 2020 and March 2021 are recorded as 7.06 and 6.26 feet, respectively. The groundwater level increased 0.8 feet in the well, as stated. Well MKTF-14 is also located directly south of the hydrocarbon seep area. In contrast, the depth to water readings collected from well MKTF-4 were fluctuating and the well is located southeast of the hydrocarbon seep area. Well MKTF-4 does not appear to match the description. Correct the typographical error in the 2021 second quarter status report, as appropriate.

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313  
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**Comment 2**

In the *Activities conducted during first quarter 2021*, paragraph 2, page 1, the Permittee states, "Marathon Petroleum Company (MPC) is continuing to evaluate the reason for increased water levels and will submit a letter with the findings of the evaluation to NMED following completion. In addition, MPC is currently evaluating PW-3 to determine if potable water is being lost through casing leaks. A memorandum detailing the findings of the PW-3 evaluation will be submitted during the third quarter of 2021." In Attachment B, the Permittee's response to Comment 1 of the NMED's *Approval with Modifications*, dated March 30, 2021, also states that the changes in water levels could be a result of the domestic and fire water system operation. The referenced memorandum must be submitted for NMED's review no later than **September 30, 2021**, as stated. No response required.

**Comment 3**

In the *Activities conducted during first quarter 2021*, paragraph 1, page 2, the Permittee states, "[a]dditional Laser Induced Fluorescence (LIF) investigations have also been completed in the area delineating the gasoline release and were submitted in the Marketing Tank Farm Laser-Induced Fluorescence/Hydraulic Profiling Investigation report submitted on April 1, 2021." Comment 5 of the NMED's *Disapproval Marketing Tank Farm Laser-induced Fluorescence/Hydraulic Profiling Investigation Report*, dated June 2, 2021, states, "the water seep location must also be visually monitored on a monthly basis for potential breakthrough. Propose to monitor the seep and report the monitoring results in the future quarterly hydrocarbon seep interim measures status reports." Report the monitoring results in the future status reports accordingly.

**Comment 4**

In Attachment B, the Permittee's response to Comment 5 of the NMED's *Approval with Modifications*, dated March 30, 2021, states, "[a]n interim measure report summarizing these activities will be submitted no later than July 30, 2021." Comment 37 of the NMED's *Disapproval Marketing Tank Farm Laser-induced Fluorescence/Hydraulic Profiling Investigation Report*, dated June 2, 2021, states, "[t]he interim measure work plan required by Comment 5 of the NMED's March 30, 2021 Approval with Modifications is no longer necessary because of the recommendations provided in the Report. However, when the remediation system is implemented, its effectiveness must be evaluated and reported to the NMED. Submit an interim measures report that summarizes the monitoring data collected and effectiveness of the remediation system no later than **December 31, 2021**." Accordingly, the work plan is no longer required to be submitted.

**Comment 5**

In Attachment B, the Permittee's response to Comment 6 of the NMED's *Approval with Modifications*, dated March 30, 2021, states, "[a] response letter was submitted to NMED on April 14, 2021 in regard to the Investigation Work Plan for Area of Concern 35 that did not include the updated proposed location for [the] monitoring well addressed in this comment.

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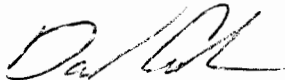
The monitoring well will be relocated west of the borrow pit seep area to support in delineating the SPH plume and the revised location is shown on Figure 1." The location of the proposed well is not shown on Figure 1 of this Report. In addition, the Permittee submitted the *[Response to] Approval with Modifications Response to Disapproval Investigation Work Plan No. 2 Area of Concern 35*, dated April 6, 2021; however, the document did not include a figure depicting the proposed well location. Provide a clarification in the 2021 second quarter status report. Regardless, the monitoring well proposed to be installed west of the borrow pit seep area does not appear to be necessary based on the results of the LIF investigation because well MKTF-32 is located west of the borrow pit seep area and may serve as a sentinel well. Provide a discussion in the 2021 second 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 quarterly status reports. The 2021 second quarter status report that addresses all comments above must be submitted no later than **July 31, 2021**. In addition, the memorandum required by Comment 2 must be submitted no later than **September 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 505-690-6930.

Sincerely,



Dave Cobrain  
Program Manager  
Hazardous Waste Bureau

cc: M. Suzuki, NMED HWB  
T. McDill, OCD  
L. King, EPA Region 6 (6LCRRC)

File: Reading File and WRG 2021 file