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Certified Mail - Return Receipt Requested

August 17, 2021

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

**RE: DIRECTION
PROPOSED GROUNDWATER WELL GROUPINGS FIGURE
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-MISC**

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) *[Figure for the Proposed Groundwater Well Groupings (Figure)]*, received July 28, 2021 via email. The Figure was submitted as requested during a July 23, 2021 conference call. NMED has reviewed the Figure and hereby issues this Direction with the following comments.

Comment 1

The Figure indicates that the Deep Well Group consists of wells PW-2, PW-3, PW-4, OW-1, OW-10, OW-11, OW-12, and OW-13. Since production wells (PWs) are screened much deeper than observation wells (OWs), PWs and OWs must not be categorized in the same group. Revise the Figure accordingly.

Comment 2

The former Group B Well Group was divided into the SWMU-1 Well Group and the WWT Well Group according to the Figure. The SWMU-1 Well Group consists of wells OW-59, OW-60, GWM-1, GWM-2, and GWM-3. Although wells GWM-1, GWM-2, and GWM-3 are representative of SWMU-1 groundwater monitoring, wells OW-59 and OW-60 are more representative of the OCD Landfarm groundwater monitoring. Therefore, the designation of the well grouping does not appear to be appropriate. In addition, the WWT Well Group consists of wells NAPIS-1, NAPIS-2, NAPIS-3, OAPIS-1, STP1-NW, and STP1-SW. These wells are located in close proximity

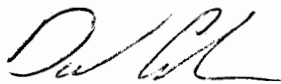
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of SWMU-1 and can also be included in the SWMU-1 groundwater monitoring group. Accordingly, the former grouping (Group B) may be more representative of the overall general area and NMED is of the opinion that the proposed division of the wells is unnecessary. Nevertheless, if the Permittee determines that the division of the former Group B is necessary, the Permittee must adjust the groupings to be more representative of the areas. Revise the Figure accordingly.

The Permittee must address all comments in this Direction in the groundwater monitoring work plans.

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

File: Reading File and WRG 2021 file