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Certified Mail - Return Receipt Requested



September 14, 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 SECOND QUARTER STATUS REPORT
WESTERN REFINING SOUTHWEST INC., GALLUP REFINERY
EPA ID # NMD000333211
HWB-WRG-21-011**

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has completed its review of the Marathon Petroleum Company dba Western Refining Southwest Inc., Gallup Refinery (Permittee) *Hydrocarbon Seep Interim Measures 2021 Second Quarter Status Report* (Report), dated July 27, 2021 and received August 3, 2021. NMED has reviewed the Report, and hereby issues this Approval with Modifications with the following comments.

Comment 1

In the *Borrow Pit Activities*, page 2 of 3, paragraph 4, the Permittee states, “[t]he water seep [near the 90-day pad area] was inspected June 22, 2021 and was found to be dry with no evidence of SPH.” In addition, separate phase hydrocarbon (SPH) was not detected in well MKTF-42 during the June 2021 gauging event according to Table 2A (Fluid Level Measurements for Wells MKTF-1 through MKTF-50), page 42 of 50. Although SPH was not detected at the water seep, NMED is concerned that SPH may potentially migrate further west toward the 90-day pad area. Comment 5 of the June 2, 2021 NMED’s *Disapproval Marketing Tank Farm Laser-induced Fluorescence/Hydraulic Profiling Investigation Report*, states, “the water seep location must also be visually monitored on a monthly basis for potential breakthrough.” The Permittee must continue to monitor the water seep location and report the findings in the 2021 third quarter status report.

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Comment 2

In the *Borrow Pit Activities*, page 2 of 3, paragraph 5, the Permittee states, “[a] sentinel well was planned to be installed west of the Borrow Pit sumps in the 3rd quarter. Per NMED’s [C]omment 5 from [the] Approval with Modifications Hydrocarbon Seep Interim Measures First Quarter Status Report, this well will not be installed. MKTF-32 is located west of the borrow pit and will serve as a sentinel well for the Borrow Pit seep area.” Comment 5 of the NMED’s July 6, 2021 *Approval with Modifications*, states, “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.” To clarify, Comment 5 constitutes an opinion about the necessity of the proposed monitoring well rather than directing the Permittee to use well MKTF-32 as a sentinel well. The comment requires the Permittee to evaluate and discuss whether well MKTF-32 is appropriate for use as a sentinel well for monitoring SPH migration. Evaluate and discuss whether the proposed monitoring well is necessary or if well MKTF-32 is adequate to monitor SPH migration west of the Borrow Pit seep area in the 2021 third quarter status report.

Comment 3

In the *3rd Quarter 2021 IM Activities, Investigations, Hydrocarbon Seep Area Wells*, page 3 of 3, paragraph 2, the Permittee states, “[t]he replaced wells will provide a more accurate representation of SPH plume delineation. The existing wells [MKTF-1, MKTF-2, MKTF-4, MKTF-17, and MKTF-18] will be plugged and abandoned.” Existing wells MKTF-1, MKTF-2, MKTF-4, MKTF-17, and MKTF-18 must not be plugged and abandoned; they must be preserved at this time. Furthermore, the replacement wells must be installed adjacent to the existing wells. NMED will evaluate the abandonment of the existing wells once the data collected from the existing and replacement wells are compared and evaluated. The Permittee must monitor the existing and replacement wells (once they have been installed) and submit the evaluation in a future status report. Acknowledge this provision in the 2021 third quarter status report.

Comment 4

Table 2A (Fluid Level Measurements for Wells MKTF-1 through MKTF-50), page 49 of 50, reports the first appearance of SPH in well MKTF-49 in June 16, 2021. Well MKTF-49 is located directly downgradient from, and between, Tanks 101 and 102. Crude oil was previously stored in these tanks but are reportedly not in use. Confirm that Tanks 101 and 102 are not currently in use and describe the nature of the detected SPH in well MKTF-49 in the 2021 third quarter status report.

Comment 5

Table 3A (April Vacuum Truck Extractions – MKTF-Wells) and 3C (May Vacuum Truck Extractions – MKTF-Wells) indicate that groundwater was not recovered; only SPH was recovered from well MKTF-20 during the recovery events. However, according to Table 2A, page 20 of 50, groundwater was present in well MKTF-20 during the April and May 2021 recovery events.

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Explain the discrepancy in the 2021 third quarter status report.

The Permittee has fulfilled its obligation to implement source control measures to the extent practicable and to 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 third quarter status report that addresses the comments included above must be submitted no later than **November 5, 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: L. Tsinnajinnie, NMED HWB
M. Suzuki, NMED HWB
T. McDill, EMNRD OCD
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File: Reading File and WRG 2021 file