



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

January 20, 2000

**CERTIFIED MAIL**

**RETURN RECEIPT NO. Z 142 564 928**

Dorinda Mancini  
Giant Refining Co.  
Route 3, Box 7  
Gallup, New Mexico 87301

Re: Discharge Plan GW-130 Renewal Comments-Giants Bloomfield Refinery

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Giant Refining Co.'s letter dated January 07, 2000 requesting revisions to the Discharge Plan Approval Conditions. Below are the bullet items that were requested in your letter and below each item is NMOCD's response.

Item 1. In your cover letter, the OCD's policy of requiring screening or netting of exposed pits, ponds, etc. in order to protect wildlife has been mentioned. We would like to confirm that the existing aeration lagoons, raw water ponds, and the evaporation ponds presently in use at the Bloomfield facility do not require any screening or netting as long as they continue to be operated properly (as at present) and do not demonstrate any hazard to wildlife.

Response: This is standard language that is contained in all discharge plan permits. Giant is responsible to ensure this requirement will be fulfilled.

Item 2. In Conditions No.8 and No.24, please revise "oil field wastes" to read "refinery process wastewater".

Response: NMOCD's definition of "oil field waste" can be found in 19 NMAC 15.A.59. Please note it includes refineries and other processing or transportation facilities. Please note NMOCD feels it is imperative that Giant train their personnel on this definition so as to comply with item 24.

Item 3. Please note that the injection fluid will be sampled at the inlet to the injection well. Sampling is not performed at the process wastewater ponds.

Response: Noted and approved.

Dorinda Mancini

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Item 4.

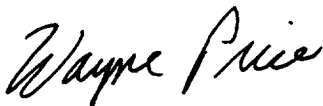
In Condition No.9, the requested chemical analyses are somewhat unclear. Different labs have different standard lists for 8260 and 8270 compounds. Is there a reference we can use to determine which compounds are necessary? For total heavy metals, we propose analyzing for the eight RCRA metals. We also note that RCRA corrosivity can be documented by the pH done as part of the general water chemistry; therefore the separate corrosivity test in 9.d would be redundant.

Response: Compounds for methods 8260 and 8270 are listed in EPA SW-846. The heavy metals shall be as shown, this covers all of the metals required in the WQCC regulations. Please note CFR 40 part 261 .22 "Characteristic of Corrosivity" requires more than just PH , therefore this condition will remain.

After reviewing your letter NMOCD hereby concludes the Discharge Plan Approval Conditions will not change. Please abide by Item 27. of the conditions and submit the signed conditions to NMOCD by February 1, 2000.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,



Wayne Price-Pet. Engr. Spec.  
Environmental Bureau

cc: OCD Aztec Office  
NMED-HRMB Santa Fe