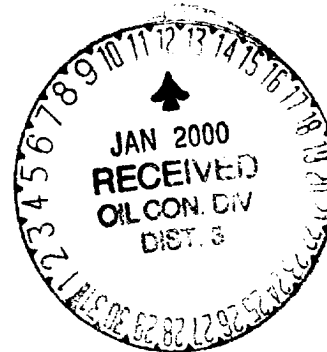




Route 3, Box 7
Gallup, New Mexico
87301
505-722-3833
505-722-0210 FAX

January 7, 2000

Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
NM Energy, Minerals and Natural Resources Dept.
2040 S. Pacheco St.
Santa Fe, New Mexico 87505



Re: Discharge Plan GW-130 Renewal Comments – Giant's Bloomfield Refinery

Dear Mr. Anderson:

We have received and reviewed the Discharge Plan Renewal Approval and the draft "Attachment to the Discharge Plan GW-130" as detailed in your letter of December 14, 1999. Please consider the following comments and proposed revisions, which we feel better reflect the needs and circumstances at the Bloomfield Refinery.

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

If you have any questions or require additional information, please contact me at Giant's Ciniza Refinery, at (505) 722-0227.

Sincerely,

A handwritten signature in black ink, appearing to read "Dorinda Mancini". The signature is fluid and cursive, with the first name "Dorinda" being more prominent and the last name "Mancini" following in a similar style.

Dorinda Mancini
Environmental Manager, Ciniza Refinery
Giant Refining Co.

cc: John Stokes, Vice President, Giant Refining Company
Dave Pavlich, Environmental Superintendent, Giant Refining Company
Bloomfield Environmental Department
Denny Foust, OCD, Aztec, NM

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