



## Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

July 7, 2021

Mr. Kevin Pierard, Chief  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505

**RE: Response to Disapproval  
Response to Disapproval Investigation Report Solid Waste Management Units  
(SWMU)  
No. 4 Old Burn Pit and No. 5 Landfill Areas  
Marathon Petroleum Company LP, Gallup Refinery  
(dba Western Refining Southwest LLC)  
EPA ID# NMD000333211  
HWB-WRG-17-006**

Dear Mr. Pierard:

Marathon Petroleum Company LP (dba Western Refining Southwest LLC) Gallup Refinery (MPC) is submitting this *Response to Disapproval, Response to Comments Disapproval, Investigation Report Solid Waste Management Units (SWMU) No. 4 Old Burn Pit and No. 5 Landfill Areas*. A timeline of the reports and investigations for the burn pits and landfill areas is provided below.

- Investigation Work Plan, submitted June 24, 2014
- Disapproval, received August 17, 2015
- Response to Disapproval, submitted November 19, 2015
- Approval with Modifications, submitted April 18, 2016
- Investigation Report, submitted March 13, 2017
- Disapproval, received June 7, 2018
- Response to Disapproval, submitted October 19, 2018
- Disapproval, received March 15, 2021
- Response to Disapproval of October 2018, submitted June 30, 2021

If there are any questions, please call Mr. John Moore at (915) 775-7864.

Certification

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,  
**Marathon Petroleum Company LP, Gallup Refinery**

*Robert S. Hanks*

Robert S. Hanks  
Refinery General Manager

Enclosures

cc: D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
T. McDill, NMOCD  
G. McCartney, Marathon Petroleum Corporation  
K. Luka, Marathon Petroleum Corporation  
J. Moore, Marathon Gallup Refinery  
H. Jones, Trihydro Corporation

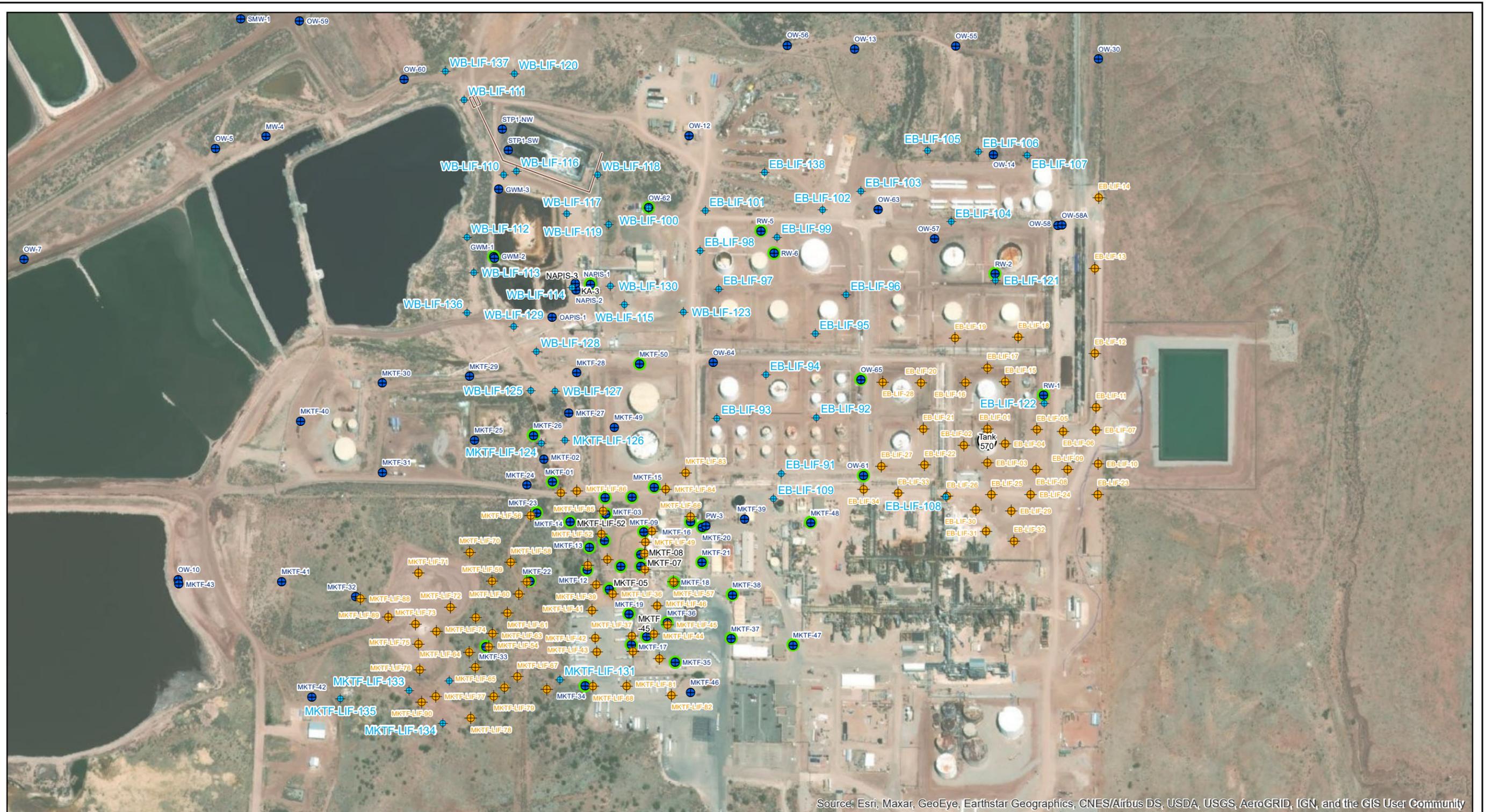
**Attachment A: Response to Comments**

**New Mexico Environment Department (NMED) to Marathon Petroleum Company (MPC) Comment Letter “Disapproval Response to Disapproval Investigation Report Solid Waste Management Units (SWMU) No. 4 Old Burn Pit and No. 5 Landfill Areas” (March 4, 2021)**

NMED Comments	MPC Responses
<b>Comment 1:</b>	<b>Response 1:</b>
<p>The Permittee only submitted the response to Comments 4 and 7 of the NMED’s June 7, 2018 Disapproval. There are total of eight comments to be addressed in the Disapproval and the response to other comments was not included in this submittal. Although the Response asserted that the revised Report would be submitted by December 14, 2018, the required submittal was not received. The June 7, 2018 Disapproval requires two hard copies, an electronic and a red-line strikeout (RLSO) version of the revised Report. The Permittee must provide the response to all NMED’s comments of the June 2, 2018 Disapproval, two hard copies and an electronic and a RLSO version of the revised Report no later than June 30, 2021.</p>	<p>This comment has been acknowledged. Marathon Petroleum Company (MPC) submitted the response to comments from the June 7, 2018 Disapproval, Investigation Report Solid Waste Management Units (SWMU) No. 4 Old Burn Pit and No. 5 Landfill Areas on June 30, 2021.</p>
<b>Comment 2:</b>	<b>Response 2:</b>
<p>The response to NMED’s Disapproval Comment 4 states, “[t]here is no storage, handling, processing or refining of petroleum hydrocarbons in the subject area.” In a response letter, explain whether the area in the vicinity of SWMUs 4 and 5 was potentially affected by recent releases (e.g., French Drain area). If recent releases potentially affected the area, propose to submit a work plan to recollect soil samples in SWMUs 4 and 5.</p>	<p>MPC does not propose recollecting soil samples in the Solid Waste Management Unit (SWMU) 4 and 5 area.</p> <p>In May 2021, MPC conducted a sitewide Laser Induced Fluorescence (LIF) Investigation. Based on the EB-LIF-138 log in the SWMU 4 area, minimal response was encountered indicating clean soil. In the surrounding area (including the French Drain), EB-LIF-101, EB-LIF-102, WB-LIF-110, WB-LIF-116, and WB-LIF-118 also show clean soil. The LIF locations and logs will be provided as an attachment in the Sitewide Laser Induced Fluorescence/Hydraulic Profiling (LIF/HP) Report, which will be submitted no later than October 31, 2021.</p> <p>Additionally, the north drainage ditch investigation is scheduled to be completed during summer 2021. The investigation is located near the SWMU 4 and 5 area. Temporary and permanent monitoring well installations, soil borings, and soil and groundwater sample collection are activities included in the north drainage ditch investigation. An investigation report summarizing the results will be submitted to NMED by December 31, 2021.</p>

**Attachment B: LIF Locations and Logs**

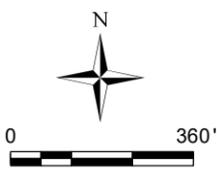
C:\TRIHEDRO\COM\CLIENTS\MARATHON\GIS\PROJECTS\GALLUP\REFINERY\LASER\_INDUCED\_FLUORESCENCE\_LIF\ADDITIONAL\_LIF\_3\_MARCH\_2021\LIF\_EB\_TANKFARM\_LOADINGRACK\_MAR2021\_FIG1.MXD



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**EXPLANATION**

- + PROPOSED LIF LOCATIONS
- + ORIGINAL LIF LOCATIONS
- + MONITORING WELLS
- SPH DETECTED IN 2020
- FRENCH DRAIN
- TANK 570



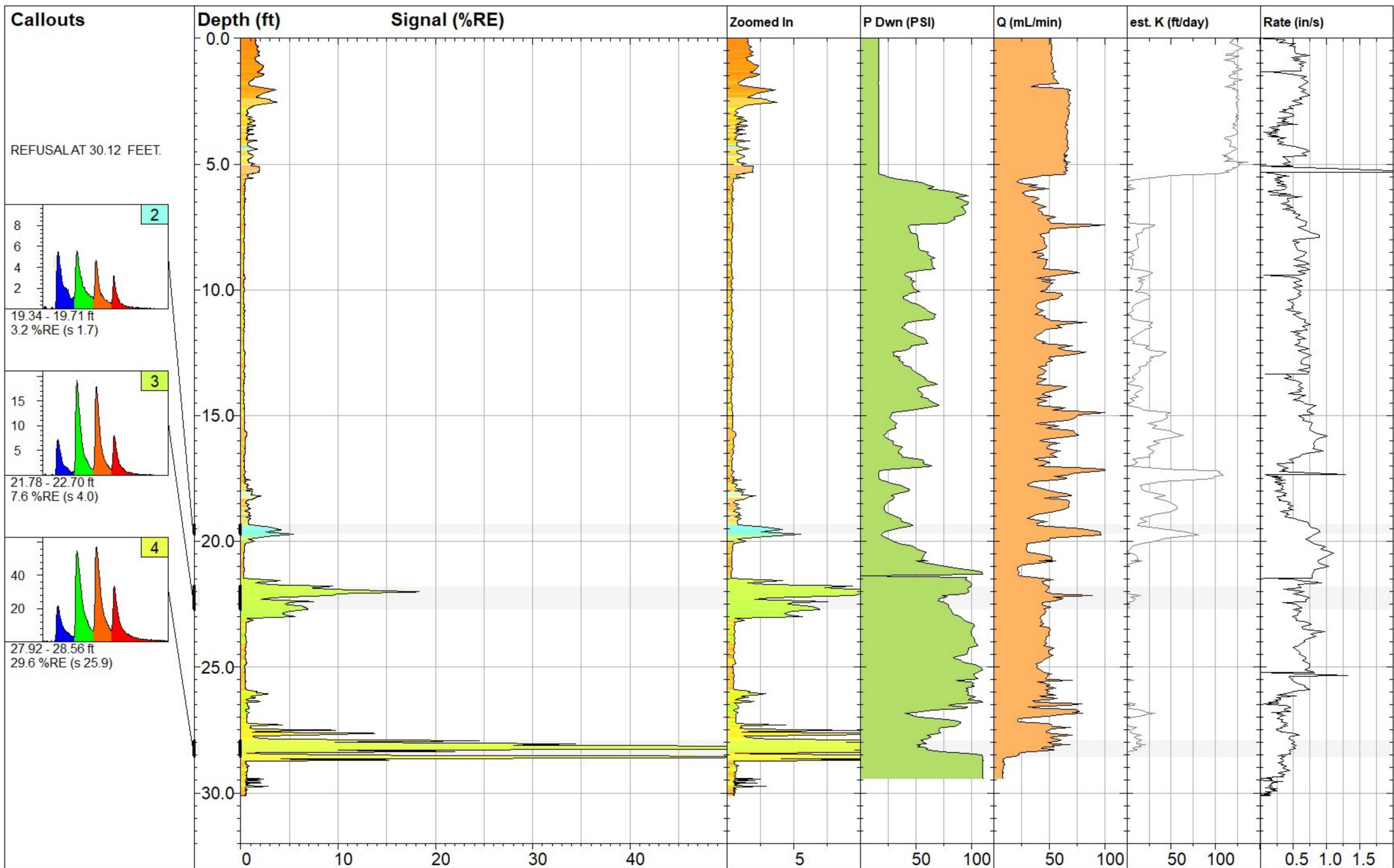
1252 Commerce Drive  
Laramie, WY 82070  
www.trihydro.com  
(P) 307/745.7474 (F) 307/745.7729

**FIGURE 1**

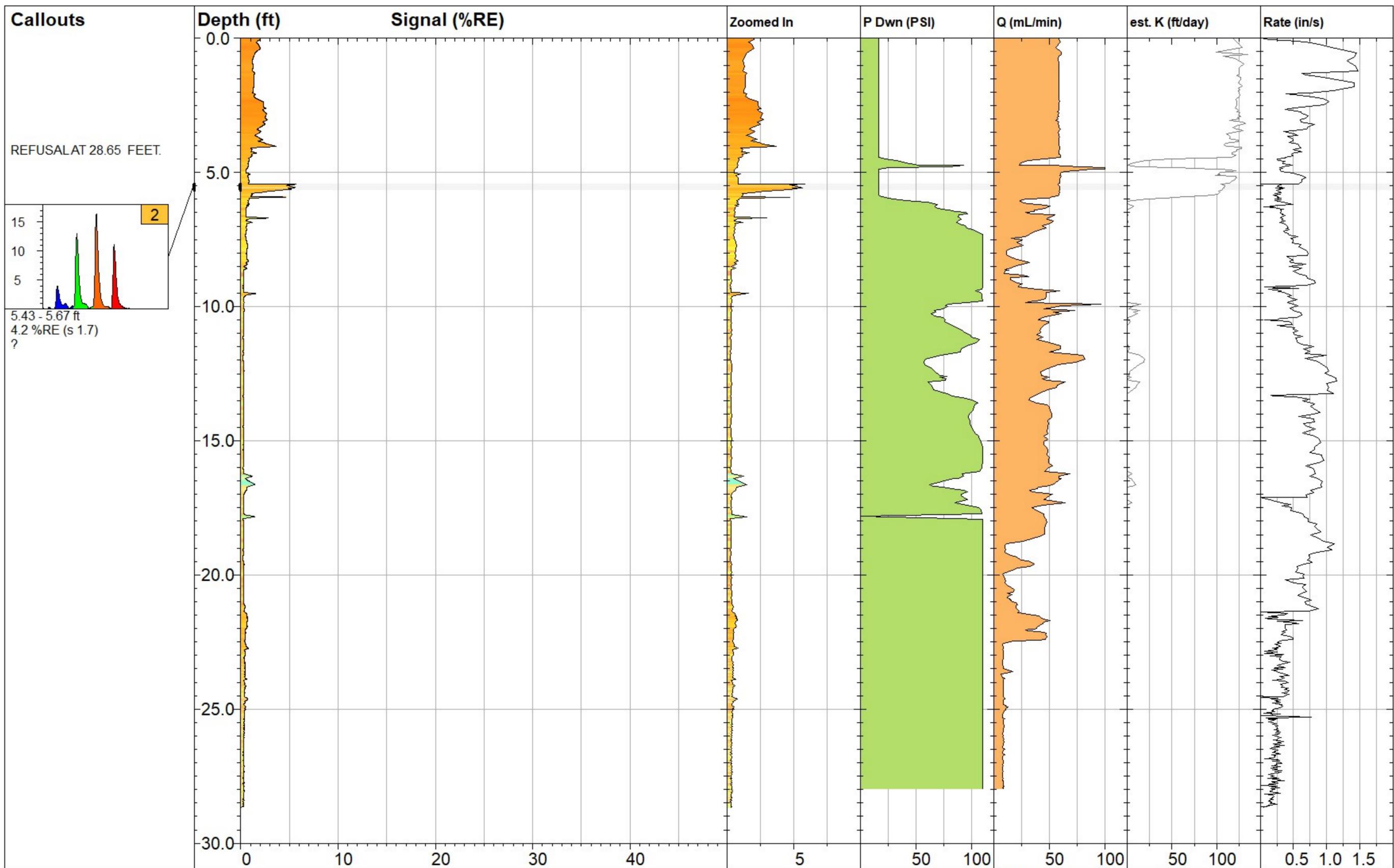
**PROPOSED LIF SAMPLE LOCATIONS  
MARKETING TANK FARM/LOADING RACK**

**MARATHON PETROLEUM COMPANY  
GALLUP REFINING DIVISION  
GALLUP, NEW MEXICO**

Drawn By: KEJ	Checked By: PH	Scale: 1" = 360'	Date: 4/22/21	File: 1_LIF_EB_TankFarm>LoadingRack_Mar2021_Fig1.mxd
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<b>EB-LIF-101</b>		<b>UVOST® By Dakota</b> www.DakotaTechnologies.com	
Site: <b>Marathon Gallup Refinery</b>	Y Coord.(Lat/North): <b>Unavailable</b>	Final Depth: <b>30.12 ft</b>	
Client / Job: <b>Trihydro / 0049B.21</b>	X Coord.(Long/East): <b>Unavailable</b>	Max Signal: <b>77.5 %RE @ 28.17 ft</b>	
Operator / Unit: <b>BG / UVOST1612</b>	Elevation: <b>Unavailable</b>	Date & Time: <b>2021-05-11 08:22 MDT</b>	

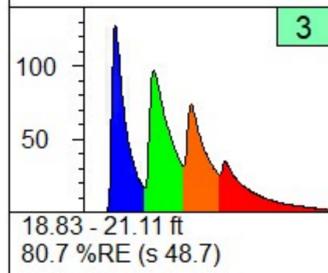
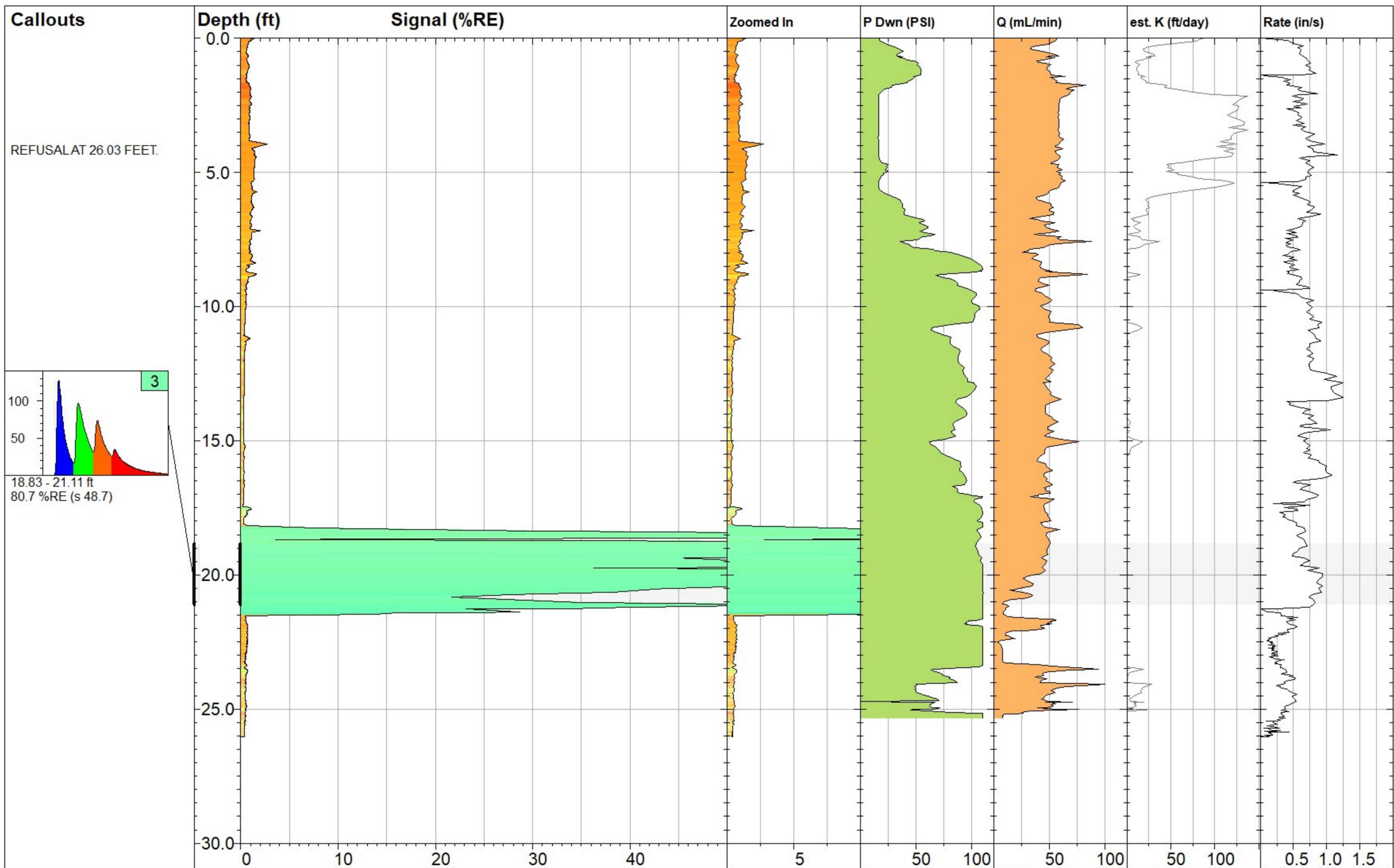


REFUSAL AT 28.65 FEET.

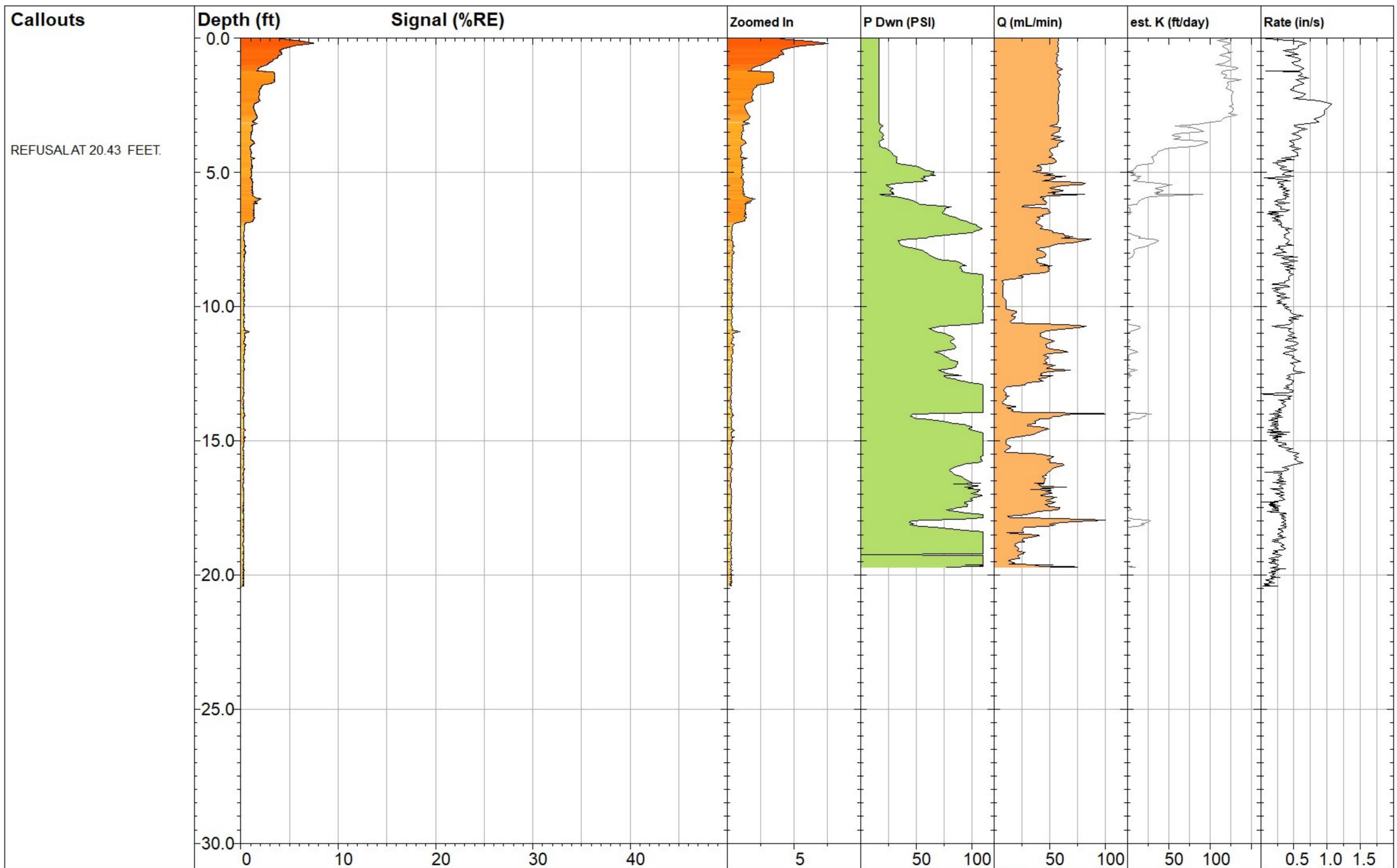
2

5.43 - 5.67 ft  
4.2 %RE (s 1.7)  
?

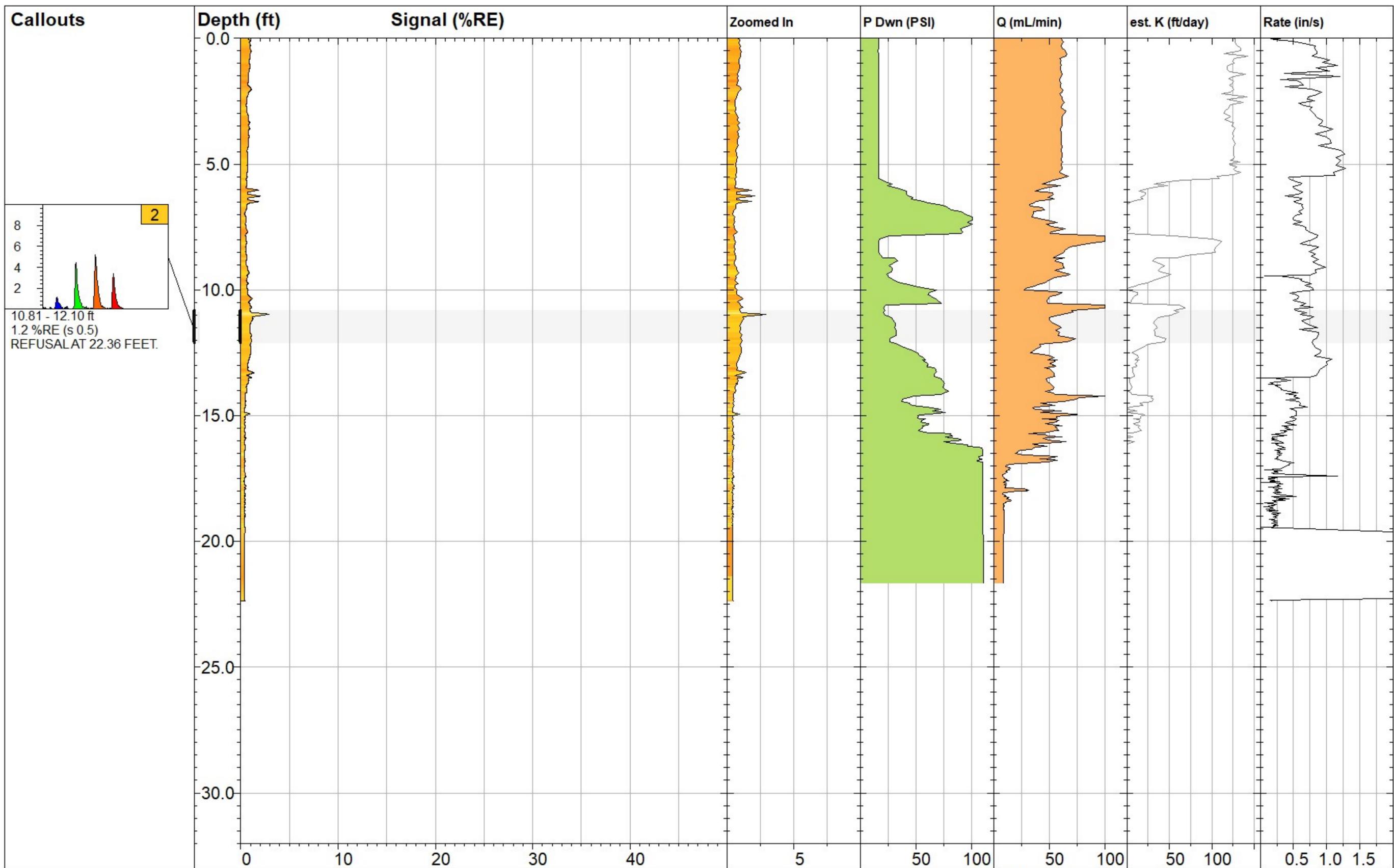
 DAKOTA TECHNOLOGIES WWW.DAKOTATECHNOLOGIES.COM	<b>EB-LIF-102</b>		<b>UVOST® By Dakota</b> www.DakotaTechnologies.com		
	Site: Marathon Gallup Refinery	Y Coord.(Lat/North): Unavailable	Final Depth: <b>28.65 ft</b>		
	Client / Job: Trihydro / 0049B.21	X Coord.(Long/East): Unavailable	Max Signal: <b>5.8 %RE @ 5.44 ft</b>		
	Operator / Unit: BG / UVOST1612	Elevation: Unavailable	Date & Time: <b>2021-05-10 13:29 MDT</b>		



 DAKOTA TECHNOLOGIES WWW.DAKOTATECHNOLOGIES.COM	<b>EB-LIF-103</b>		<b>UVOST® By Dakota</b> www.DakotaTechnologies.com		
	Site: <b>Marathon Gallup Refinery</b>		Y Coord.(Lat/North): <b>Unavailable</b>		Final Depth: <b>26.03 ft</b>
	Client / Job: <b>Trihydro / 0049B.21</b>		X Coord.(Long/East): <b>Unavailable</b>		Max Signal: <b>174.3 %RE @ 19.00 ft</b>
	Operator / Unit: <b>BG / UVOST1612</b>		Elevation: <b>Unavailable</b>		Date & Time: <b>2021-05-10 14:11 MDT</b>

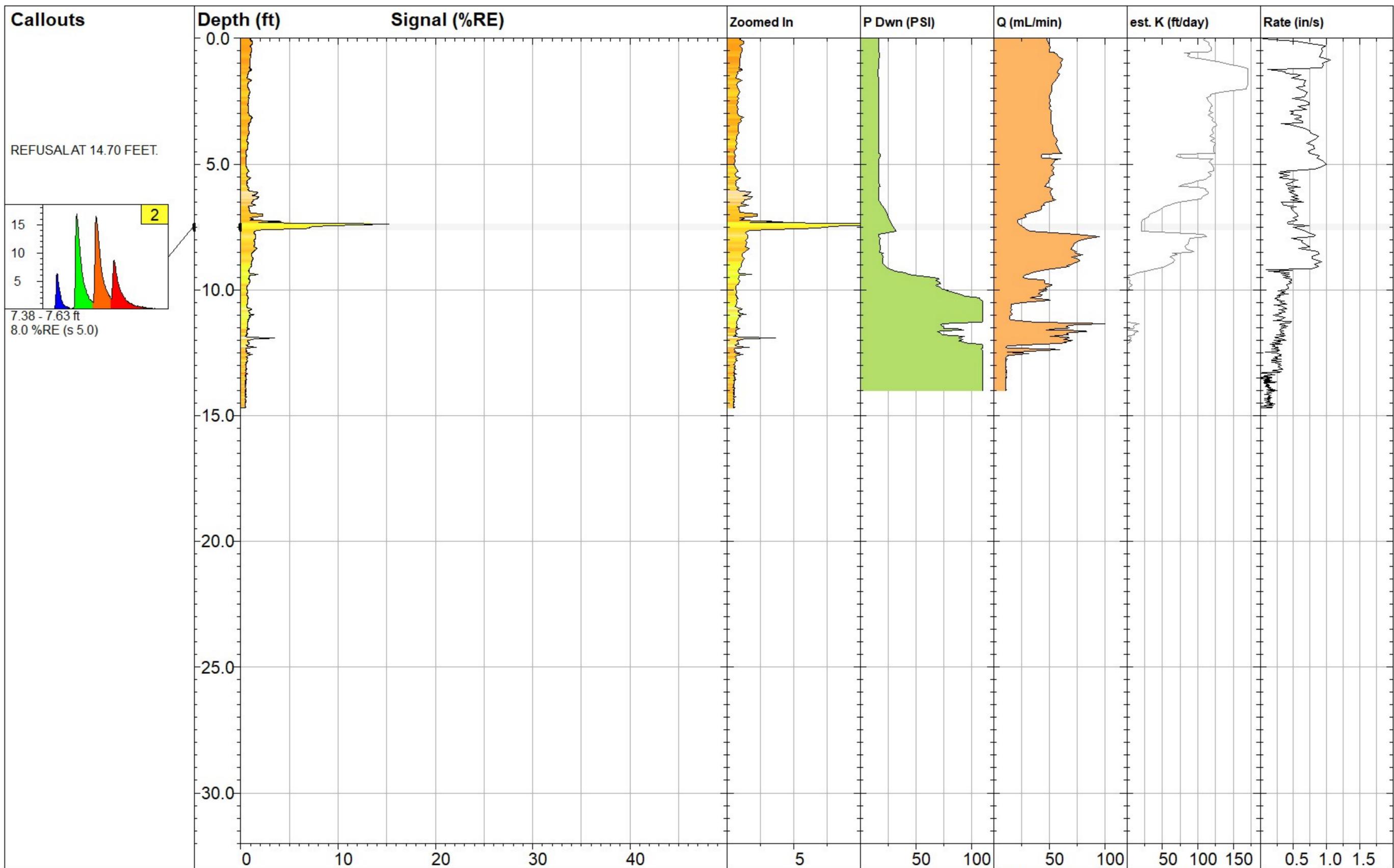


<b>EB-LIF-138</b>		<b>UVOST® By Dakota</b> www.DakotaTechnologies.com	
Site: <b>Marathon Gallup Refinery</b>	Y Coord.(Lat/North): <b>Unavailable</b>	Final Depth: <b>20.43 ft</b>	
Client / Job: <b>Trihydro / 0049B.21</b>	X Coord.(Long/East): <b>Unavailable</b>	Max Signal: <b>7.5 %RE @ 0.19 ft</b>	
Operator / Unit: <b>BG / UVOST1612</b>	Elevation: <b>Unavailable</b>	Date & Time: <b>2021-05-10 14:52 MDT</b>	

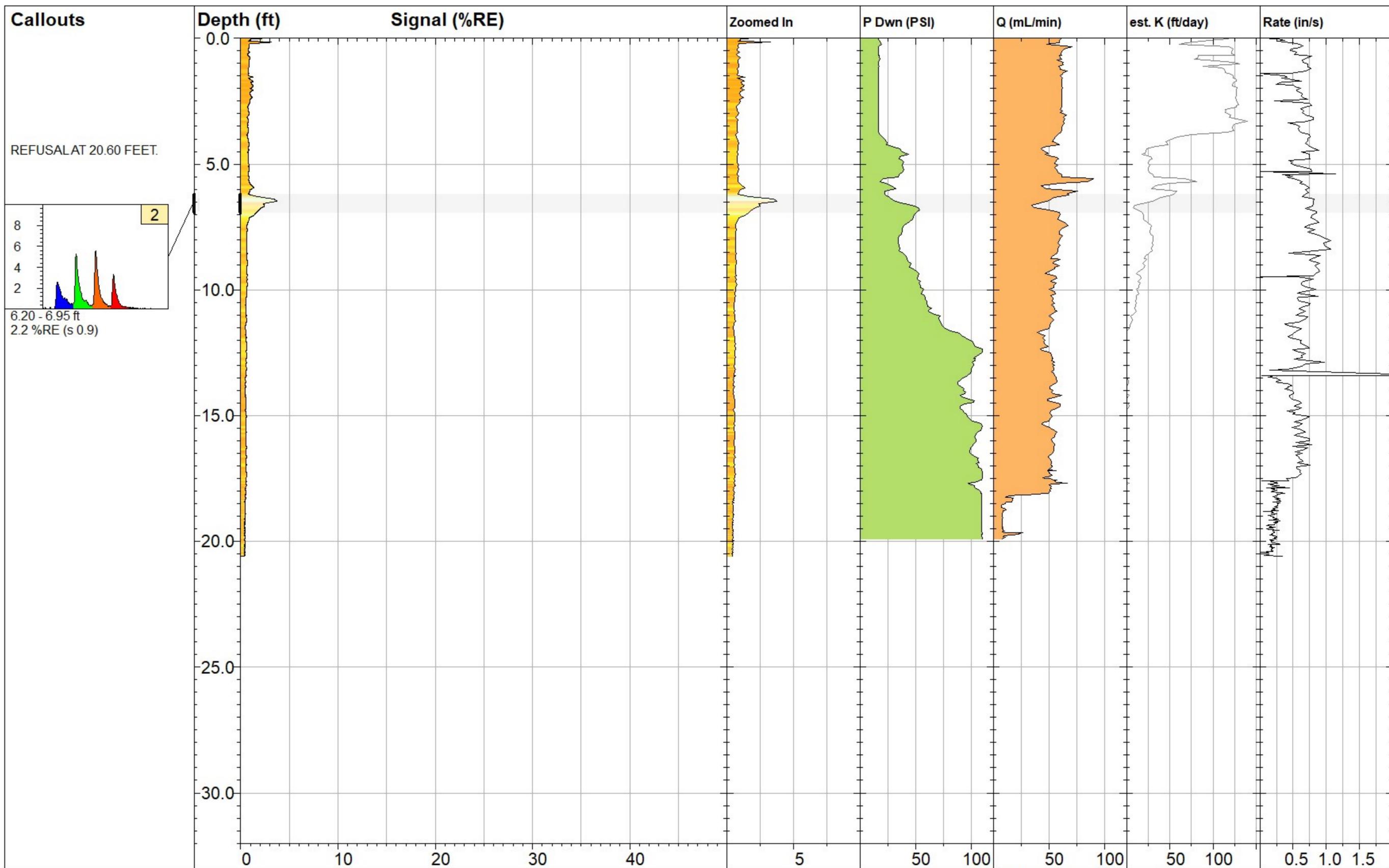


2  
 8  
 6  
 4  
 2  
 10.81 - 12.10 ft  
 1.2 %RE (s 0.5)  
 REFUSAL AT 22.36 FEET.

 DAKOTA TECHNOLOGIES WWW.DAKOTATECHNOLOGIES.COM	<b>WB-LIF-110</b>		<b>UVOST® By Dakota</b> www.DakotaTechnologies.com	
	Site: <b>Marathon Gallup Refinery</b>	Y Coord.(Lat/North): <b>Unavailable</b>	Final Depth: <b>22.36 ft</b>	
	Client / Job: <b>Trihydro / 0049B.21</b>	X Coord.(Long/East): <b>Unavailable</b>	Max Signal: <b>2.9 %RE @ 10.97 ft</b>	
	Operator / Unit: <b>BG / UVOST1612</b>	Elevation: <b>Unavailable</b>	Date & Time: <b>2021-05-11 14:57 MDT</b>	



 <p><b>DAKOTA TECHNOLOGIES</b> WWW.DAKOTATECHNOLOGIES.COM</p>	<p><b>WB-LIF-116</b></p>		<p><b>UVOST® By Dakota</b> www.DakotaTechnologies.com</p>		
	<p>Site: <b>Marathon Gallup Refinery</b></p>		<p>Y Coord.(Lat/North): <b>Unavailable</b></p>		<p>Final Depth: <b>14.70 ft</b></p>
	<p>Client / Job: <b>Trihydro / 0049B.21</b></p>		<p>X Coord.(Long/East): <b>Unavailable</b></p>		<p>Max Signal: <b>15.4 %RE @ 7.38 ft</b></p>
	<p>Operator / Unit: <b>BG / UVOST1612</b></p>		<p>Elevation: <b>Unavailable</b></p>		<p>Date &amp; Time: <b>2021-05-11 14:17 MDT</b></p>



REFUSAL AT 20.60 FEET.

6.20 - 6.95 ft  
2.2 %RE (s 0.9)

 DAKOTA TECHNOLOGIES WWW.DAKOTATECHNOLOGIES.COM	<b>WB-LIF-118</b>		<b>UVOST® By Dakota</b> www.DakotaTechnologies.com	
	Site: <b>Marathon Gallup Refinery</b>	Y Coord.(Lat/North): <b>Unavailable</b>	Final Depth: <b>20.60 ft</b>	
	Client / Job: <b>Trihydro / 0049B.21</b>	X Coord.(Long/East): <b>Unavailable</b>	Max Signal: <b>3.7 %RE @ 6.48 ft</b>	
	Operator / Unit: <b>BG / UVOST1612</b>	Elevation: <b>Unavailable</b>	Date & Time: <b>2021-05-11 15:31 MDT</b>	

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
 Action 36171

**CONDITIONS**

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 36171
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

**CONDITIONS**

Created By	Condition	Condition Date
jburdine	Accepted for Record Retention Purposes-Only	11/22/2022