



## Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

September 16, 2022

Mr. Rick Shean, Chief  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303

**RE: Response to Approval with Modifications  
2020 Annual Groundwater Monitoring Report  
Western Refining Southwest LLC  
(DBA Marathon Gallup Refinery)  
EPA ID# NMD000333211  
HWB-WRG-21-012**

Dear Mr. Pierard:

Attached please find the response to comments from the New Mexico Environment Department (NMED) Approval with Modifications letter dated June 29, 2022. A timeline of the 2020 Annual Groundwater Monitoring Report is provided below.

- Report, submitted September 1, 2021
- Disapproval, received October 20, 2021
- Response to Disapproval, submitted March 16, 2022
- Approval with Modifications, received June 29, 2022

If you have any questions or comments regarding the information contained herein, please do not hesitate to contact Mr. John Moore at (505) 879-7643.



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### Certification

*I certify under penalty of law that this document and all attachments were prepared under my direction of 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,

Western Refining Southwest LLC, DBA Marathon Gallup Refinery

*John Moore*

Ruth Cade  
Vice-President

Enclosures

cc: D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
L. Barr, NMOCD  
K. Luka, Marathon Petroleum Corporation  
M. Bracey, Marathon Petroleum Corporation  
J. Moore, Marathon Gallup Refinery  
H. Jones, Trihydro Corporation

**ATTACHMENT A**  
**RESPONSE TO COMMENTS**

**New Mexico Environment Department (NMED) to Western Refining Southwest LLC (DBA Marathon Gallup Refinery [Refinery]) Comment Letter “Approval with Modifications 2020 Annual Groundwater Monitoring Report” (June 29, 2022)**

NMED Comments	Refinery Responses
<p><b>Comment 1:</b></p> <p>In the response to NMED’s Disapproval Comment 3, the Permittee states, “[i]t should be noted that previous annual reports have presented the fluid level depth to water from the measuring point.” Prior to receiving the revised Tables, NMED used the ground level elevation, well casing rim elevation, groundwater elevation, and stick-up length from previous reports (e.g., 2019 Report) to determine that the fluid level (depth to water) was reported as a unit of feet below well casing rim even though it was not described in the Report or noted in the tables. All fluid levels were correctly reported as a unit of ft bgs in the revised Report, as directed. No revision or response is required.</p>	<p><b>Response 1:</b></p> <p>This comment is acknowledged.</p>
<p><b>Comment 2:</b></p> <p>In the response to NMED’s Disapproval Comment 10, the Permittee states, “[c]urrently, the recovery systems are no longer active and have been removed.” NMED was not aware that the groundwater recovery systems were decommissioned. The Permittee must notify NMED prior to making such decisions in the future. Submit a letter report that summarizes decommissioning activities and the basis for removal of the systems (e.g., change in extent of contaminant plumes) no later than September 16, 2022.</p>	<p><b>Response 2:</b></p> <p>The response statement, “[c]urrently, the recovery systems are no longer active and have been removed” was misstated. The recovery systems are still in place; however, the pumps have been removed and stored since the systems were not operating and remain off.</p>

**New Mexico Environment Department (NMED) to Western Refining Southwest LLC (DBA Marathon Gallup Refinery [Refinery]) Comment Letter “Approval with Modifications 2020 Annual Groundwater Monitoring Report” (June 29, 2022)**

NMED Comments	Refinery Responses
<b>Comment 3:</b>	<b>Response 3:</b>
<p>In the response to NMED’s Disapproval Comment 26, the Permittee states, “[t]he VOC data were rejected because VOCs were analyzed outside of the method holding time of 7 days [and a] summary of this explanation is provided in Appendix D3.” Appendix D3 contains multiple documents. The titles of the documents do not allow readers to easily find the pertinent information. In future groundwater monitoring reports, revise the titles of the documents in Appendix D3 in a manner that allows readers to easily locate pertinent information or provide A Table of Contents in the beginning of Appendix D3 to aid reviewers. The same issue is found in Appendix C that contains multiple laboratory reports. Revise the titles of the documents in Appendix C or provide a Table of Contents listing all the wells with links to the relevant lab report and a page listing in the beginning of Appendix C listing in future groundwater monitoring reports. No revision is required to the Report.</p>	<p>This comment is acknowledged.</p>

**New Mexico Environment Department (NMED) to Western Refining Southwest LLC (DBA Marathon Gallup Refinery [Refinery]) Comment Letter “Approval with Modifications 2020 Annual Groundwater Monitoring Report” (June 29, 2022)**

NMED Comments	Refinery Responses
<p><b>Comment 4:</b></p> <p>In the response to NMED’s Disapproval Comment 29, the Permittee states, “[a] note has been added to Table 3-1 and Appendix 8-1 to describe the change and the explanation.” Although the error identified in Table 3-1 was corrected, Appendix B-1 remained uncorrected and the Permittee did not include an explanation as stated in the response to Comment 29. Although no revision is required to the Report, Appendix B-1 must be revised appropriately in future reports.</p>	<p><b>Response 4:</b></p> <p>This comment is acknowledged.</p>
<p><b>Comment 5:</b></p> <p>In the response to NMED’s Disapproval Comment 30, the Permittee states, “[c]ommon information shared between the two tables are the sample location and frequency. The Refinery proposes to consolidate the two tables into one in future reports.” NMED concurs with the Permittee’s proposal of consolidating the two tables into one in future reports. No revision is required to the Report.</p>	<p><b>Response 5:</b></p> <p>This comment is acknowledged.</p>

**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 143913

**CONDITIONS**

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 143913
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

**CONDITIONS**

Created By	Condition	Condition Date
scwells	Accepted for Record Retention Purposes-Only	11/23/2022