

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Wednesday, November 16, 2016 2:37 PM
To: 'Dade, Lewis (Randy)'; Griswold, Jim, EMNRD
Cc: McWatters, Denise; O'Brien, Robert (Bob) K.; Holder, Mike; Marks, Allison, EMNRD; Bada, Cheryl, EMNRD
Subject: ACO WQA-OCD-CO-2015-002 RO Reject Water Discharge Monthly Report for October 2016

Randy:

The New Mexico Oil Conservation Division (OCD) has completed its review of the above subject report and concurs with the Permittee's report.

In accordance with WQA-OCD-CO-2016-001, Section III Order, 1(a) ii & iii:

ii. After an alternative disposal method for the RO reject fluid stream has been selected, Navajo will promptly revise the permit renewal application for Discharge Permit GW-028 to incorporate a description of the alternative disposal method for the RO reject fluid stream, including a schedule for the installation and commencement of operation of the alternative disposal method.

iii. Navajo is authorized to continue land application of the RO reject fluid stream in accordance with the current terms of Discharge Permit GW-028 until such time as OCD approves a permit renewal application for Discharge Permit GW-028 that incorporates an alternative disposal method for the RO reject fluid stream. The parties intend that a permit renewal, which incorporates an alternative disposal method, will provide for the continuation of the current land application of the RO reject fluid until the alternative disposal method is operationally capable of accepting the waste stream.

The Permittee on October 21, 2016 selected the UIC Class I (Non-Hazardous) Disposal Well "WDW-4" and will be meeting with OCD on October 29, 2016 to address the schedule for installation and commencement of operation of the alternate disposal method.

Please contact me if you have questions. Thank you.

-----Original Message-----

From: Dade, Lewis (Randy) [mailto:Lewis.Dade@HollyFrontier.com]
Sent: Wednesday, November 16, 2016 12:07 PM
To: Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>; Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Cc: McWatters, Denise <Denise.McWatters@HollyFrontier.com>; O'Brien, Robert (Bob) K. <Robert.O'Brien@HollyFrontier.com>; Holder, Mike <Michael.Holder@hollyfrontier.com>; Marks, Allison, EMNRD <AllisonR.Marks@state.nm.us>; Brancard, Bill, EMNRD <bill.brancard@state.nm.us>; Dade, Lewis (Randy) <Lewis.Dade@HollyFrontier.com>
Subject: Emailing: OCT 2016 MONTHLY REPORT GW-028

Your message is ready to be sent with the following file or link attachments:

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November 15, 2016

Submitted electronically via email to jim.griswold@state.nm.us and carlj.chavez@state.nm.us

Oil Conservation Division
New Mexico Energy, Minerals & Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

**RE: Discharge Permit GW-028
Monthly Report – October 2016 Reporting Period**

Dear Sirs:

In accordance with Condition 4.B.7 of Discharge Permit GW-028 (the Permit), the HollyFrontier Navajo Refining LLC (Navajo), Artesia, New Mexico, Refinery (the Refinery) hereby submits the required monthly report to the New Mexico Energy, Minerals, and Natural Resources Department, Oil Conservation Division (OCD). This letter and all attachments provided herein constitute Navajo's October 2016 monthly report, for the period of October 1-31, 2016, under the Permit.

Specifically, this report covers the October 2016 reporting period and includes the following data and information as required by Condition 4.B.7:

- Daily discharge flow measurements for each reverse osmosis (RO) unit, which were collected as required by Condition 4.B.4.
- Analytical results of a discharge sample collected on October 11, 2016 in accordance with Condition 4.B.1 for the fourth calendar quarter. We are still waiting on lab results.

Flow rates, volumes, and discharge locations for the RO reject fluid is monitored from the three permanent RO units on a daily basis. Daily discharge rates and volumes are provided in Attachment 1. Per Mr. Chavez' request, the total discharge for the month is also shown in Attachment 1.

To satisfy the quarterly sampling requirement of Condition 4.B.1 of the Permit for the fourth quarter, samples were collected for the RO reject streams from the permanent units on October 11, 2016. The samples were analyzed for the constituents listed in sections 20.6.2.3103A, B, and C of the New Mexico Administrative Code (NMAC) and using the methods specified in Navajo's Facility Wide Groundwater Monitoring Program (FWGWMP).

On June 23, 2016, Navajo submitted an application to renew and modify Discharge Permit GW-028 in accordance with Condition 1.F of the Permit. Navajo received notification from OCD that the application was deemed administratively complete on July 28, 2016, and notification that the application was determined to be technically incomplete on September 9, 2016.

On October 21, 2016, in compliance with the requirements of WQA-OCD-CO-2013-001, Navajo notified OCD of the recommended alternative management of the RO Reject stream.

Navajo is committed to proactively meeting the requirements of the Permit and working cooperatively with OCD. If you have any questions or comments, please contact me at 575-746-5487.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Denton", with a horizontal line extending to the right.

Scott M. Denton
Environmental Manager

Enclosures:

Attachment 1: Daily Discharge Flowrates and Volumes

cc. HFC: D. McWatters, R. O'Brien, M. Holder
OCD: A. Marks, B. Brancard

Attachment 1
Daily Discharge Flowrates and Volumes

**Daily RO Reject Discharge Flow Rate Measurements
and Calculated Daily Discharge**

| | Permanent RO Units | | | | Daily Discharge Volume |
|---------------------------|--------------------|--------|--------|-------------------------------------------|------------------------|
| | Metered Data | | | Combined RO Reject Discharge (Calculated) | |
| | GPM | GPM | GPM | GPM | BBL/DAY |
| | SOUTH | NORTH | MIDDLE | | |
| 10/1/2016 | 120.85 | 121.19 | 43.85 | 285.88 | 9,801.60 |
| 10/2/2016 | 123.33 | 121.61 | 44.95 | 289.89 | 9,939.09 |
| 10/3/2016 | 122.52 | 119.24 | 39.90 | 281.66 | 9,656.91 |
| 10/4/2016 | 122.89 | 120.11 | 42.41 | 285.41 | 9,785.49 |
| 10/5/2016 | 123.08 | 119.88 | 41.94 | 284.90 | 9,768.00 |
| 10/6/2016 | 123.25 | 120.72 | 43.43 | 287.40 | 9,853.71 |
| 10/7/2016 | 123.73 | 122.59 | 42.18 | 288.50 | 9,891.43 |
| 10/8/2016 | 126.33 | 123.99 | 47.82 | 298.14 | 10,221.94 |
| 10/9/2016 | 129.05 | 126.43 | 52.65 | 308.13 | 10,564.46 |
| 10/10/2016 | 129.21 | 125.56 | 50.49 | 305.26 | 10,466.06 |
| 10/11/2016 | 128.90 | 124.34 | 47.96 | 301.20 | 10,326.86 |
| 10/12/2016 | 129.30 | 123.40 | 46.25 | 298.95 | 10,249.71 |
| 10/13/2016 | 128.23 | 122.64 | 44.72 | 295.59 | 10,134.51 |
| 10/14/2016 | 122.93 | 123.29 | 45.72 | 291.94 | 10,009.37 |
| 10/15/2016 | 123.07 | 123.14 | 45.89 | 292.09 | 10,014.51 |
| 10/16/2016 | 121.08 | 121.87 | 43.35 | 286.29 | 9,815.66 |
| 10/17/2016 | 121.89 | 122.59 | 47.16 | 291.64 | 9,999.09 |
| 10/18/2016 | 121.88 | 121.42 | 44.68 | 287.98 | 9,873.60 |
| 10/19/2016 | 123.55 | 123.35 | 48.45 | 295.34 | 10,125.94 |
| 10/20/2016 | 123.60 | 123.53 | 48.39 | 295.52 | 10,132.11 |
| 10/21/2016 | 124.41 | 125.17 | 49.46 | 299.03 | 10,252.46 |
| 10/22/2016 | 124.54 | 125.54 | 50.29 | 300.37 | 10,298.40 |
| 10/23/2016 | 123.88 | 124.35 | 47.41 | 295.64 | 10,136.23 |
| 10/24/2016 | 124.23 | 124.82 | 48.58 | 297.64 | 10,204.80 |
| 10/25/2016 | 122.90 | 122.97 | 44.04 | 289.90 | 9,939.43 |
| 10/26/2016 | 123.77 | 124.18 | 46.65 | 294.60 | 10,100.57 |
| 10/27/2016 | 125.13 | 119.98 | 52.15 | 297.26 | 10,191.77 |
| 10/28/2016 | 137.25 | 0.08 | 136.10 | 273.43 | 9,374.74 |
| 10/29/2016 | 135.86 | 49.33 | 107.93 | 293.13 | 10,050.17 |
| 10/30/2016 | 129.12 | 142.56 | 49.82 | 321.49 | 11,022.51 |
| 10/31/2016 | 130.05 | 142.39 | 51.71 | 324.15 | 11,113.71 |
| TOTAL (bbls/month) | | | | | 313,314.86 |