

State of New Mexico
Energy, Minerals and Natural Resources Department

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Oil Conservation Division



BY ELECTRONIC MAIL ONLY

June 30, 2021

Kawika Tupou
HollyFrontier Navajo Refining
501 East Main
Artesia, NM 88210
Kawika.Tupou@HollyFrontier.com

**Re: HollyFrontier Navajo Refinery (Facility Number fRF0000000003)
Request for Revised Plan for Modification Request: Reuse Water Sales by HollyFrontier Navajo Refining LLC, Artesia Refinery Discharge Permit GW-028: Reuse Water Sales, Discharge Permits UICI-8-1 and UICI-8-4 (WDW-1 and WDW-4 respectively): Custody Transfer Locations**

Dear Mr. Tupou:

The New Mexico Energy, Minerals and Natural Resource Department's (EMNRD) Oil Conservation Division (OCD) has reviewed your February 27, 2020 letter entitled "**Modification Request: Reuse Water Sales by HollyFrontier Navajo Refining LLC, Artesia Refinery Discharge Permit GW-028: Reuse Water Sales, Discharge Permits UICI-8-1 and UICI-8-4 (WDW-1 and WDW-4 respectively): Custody Transfer Locations**" with attachments A-F.

OCD is requesting a revised and complete, stand-alone plan to include the above attachments and responses to the following comments. Once reviewed and approved, this plan will be attached to current Ground Water Discharge Permit GW-28 as required practice for this discharge area.

1. Confirm if the project will or will not involve any Reuse Water storage tanks. If storage tanks will be involved, please describe the tanks and secondary containment.
2. Provide additional information regarding a description and schedule for site maintenance, including a schedule for attendance by HFNR staff to prevent and/or address leaks and spills. Also, describe the planned removal and disposal of any accumulated fluids in the secondary containment areas.
3. Please provide photographs or other graphics to show the relationship between the standard water truck and the secondary containment.

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4. Attachment E, Fluids Management Plan, indicates historical data is available to demonstrate that benzene and selenium concentrations are below their associated hazardous toxicity characteristic value. Please provide two-years of historical data to support the non-hazardous designation for the Reuse Water, and if applicable, note if any values exceeded the hazardous toxicity characteristic value.

Please submit the revised plan by August 30, 2021. When approved, the plan will be attached to the current permit.

If you have any questions regarding this letter, please contact me at (505) 469-6769 or TeresaL.McDill@state.nm.us .

Regards,



Teresa L. McDill
Environmental Specialist

cc: Mike Holder, HFNR
Leigh Barr, OCD