

**Western Refining Southwest LLC**

I-40 Exit 39 A subsidiary of Marathon Petroleum Corporation
Jamestown, NM 87347

March 9, 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: Solid Waste Management Unit 1 – Test Pits
 Western Refining Southwest LLC, Gallup Refinery
 EPA ID #NMD000333211
 HWB-WRG-20-012**

Dear Mr. Pierard,

This letter presents the scope of work (SOW) for excavating test pits and conducting yield testing at Solid Waste Management Unit (SWMU 1) at the Gallup Refinery. New Mexico Environment Department (NMED) requested this SOW during the January 22, 2021 conference call between Marathon Petroleum Company, NMED, and the Oil Conservation Division.

The purpose for the test pits and yield testing is to ascertain if shallow groundwater is present within the SMWU-1 waste horizon outside of the berms and is contributing to the shallow surface water observed on SWMU-1 evaporation ponds (AL-1 and AL-2). Yield testing will be used to determine if dewatering from these sumps (if shallow water is present) can alleviate groundwater discharge to AL-1 and AL-2. In addition, dewatering sumps will be installed in the corner of AL-1, AL-2, and the evaporation pond (EP-1), if feasible. The locations for the test pits and sumps are presented on Figure 1.

Four 10 to 15 feet (ft) deep test pits are planned for the locations outside of the berms (Figure 1). The test pits will be installed with an 18-inch auger attachment on a skid steer. If sufficient groundwater is present in these test pits, a sump will be installed consisting of 6-inch diameter PVC perforated pipe and 1-inch crushed rock. Visual observations will be recorded. Wet soil excavated from the test pits will be containerized in drums and sampled for disposal. If dry, the excavated soil will be stockpiled on plastic and will be used as backfill for the test pits.

In addition to the test pits, a dewatering sump will be installed in the corner of each pond, if feasible given the consistency and stability of the waste. The sumps will consist of a shallow excavation, installed using a backhoe, placement of a 6-inch perforated PVC pipe, with 1-inch stone placed around the pipe. The anticipated depth of these sumps will be approximately 4 to 5 ft below the surface of the pond sediment. Visual observations will be recorded, including approximate depth of the waste. Based on the presence of surface water and the gelatinous consistency of the waste/sediment, there is no guarantee that the sumps

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can be installed to the full depth. These sumps will assist in dewatering the sediments in the ponds, if necessary, for waste excavation.

A 4-hour yield test will be performed using an electric powered pump to ascertain sustainable yield. This will allow an assessment of the ability of the sumps to serve as interceptor wells to alleviate groundwater infiltration into the ponds, which will facilitate excavation of the waste. Nearby monitoring wells, if available, will be gauged to provide additional data for the test. The water will be pumped to a poly tank, with water hauling by the refinery's vacuum truck and disposal in the waste water treatment plant. A summary memorandum of the test pitting and yield test results will be prepared and submitted to NMED.

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

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,

Marathon Petroleum Company LP, Gallup Refinery

A handwritten signature in cursive script that reads "Robert S. Hanks".

Robert S. Hanks
Refinery General Manager

Attachment

cc: D. Cobrain, NMED HWB
 M. Suzuki, NMED HWB
 C. Chavez OCD
 L. King, EPA Region 6
 G. McCartney, Marathon Petroleum Company
 K. Luka, Marathon Petroleum Company
 J. Moore, Marathon Gallup Refinery
 H. Jones, Trihydro Corporation

Figure 1 – Test Pit and Sump Locations



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

COMMENTS

Action 21050

COMMENTS

Operator:			OGRID:	Action Number:	Action Type:
WESTERN REFINING SOUTHWEST, IN	6700 Jefferson NE, Suite A-1	Albuquerque,	705791	21050	DISCHARGE
NM87109					PERMIT

Created By	Comment	Comment Date
cchavez	Permittee SWMU 1 Test Pit SOW 3-9-2021	03/17/2021

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CONDITIONS

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CONDITIONS OF APPROVAL

Operator:	OGRID:	Action Number:	Action Type:
WESTERN REFINING SOUTHWEST, IN NM87109	705791	21050	DISCHARGE PERMIT

OCD Reviewer	Condition
cchavez	None