

**From:** [Caitlin Fields](#)  
**To:** [Cobrain, Dave, NMENV](#); [Suzuki, Michiya, NMENV](#); [Chavez, Carl J, EMNRD](#)  
**Cc:** [Moore, John](#); [Luka, Kateri A](#); [McCartney, Gregory J.](#); [Heidi Jones](#); [Scott Crouch](#)  
**Subject:** [EXT] North Drainage Ditch Response to Approval  
**Date:** Monday, March 29, 2021 1:26:18 PM  
**Attachments:** [image001.png](#)  
[202103\\_NorthDrainDitchApprvwithMods\\_LTR-signed.pdf](#)

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Hello,

Please find the North Drainage Ditch Approval with Modifications Response for the Gallup Refinery.  
Please let John Moore know if you have any questions.

Thank you,  
Caitlin

**Caitlin Fields**  
**Associate Engineer**

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**Western Refining Southwest LLC**

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

March 29, 2021

Mr. Kevin Pierard, Chief  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303**RE: Response to Approval with Modifications**  
**Revised Investigation Work Plan North Drainage Ditch Area**  
**Marathon Petroleum Company LP, Gallup Refinery**  
**(dba Western Refining Southwest LLC)**  
**EPA ID# NMD000333211**  
**HWB-WRG-19-009**

Dear Mr. Kieling:

Marathon Petroleum Company LP (dba Western Refining Southwest LLC) Gallup Refinery is submitting the enclosed responses to your comments dated March 4, 2021 on the referenced Work Plan. The Work Plan has been revised per your comments and enclosed for your review is a revised copy of Figure 2. If there are any questions, please call John Moore at 505-879-7643.

## 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**

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

Robert S. Hanks  
Refinery General Manager

Enclosure

cc D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
C. Chavez NMOCD  
G. McCartney, Marathon Petroleum Company  
K. Luka, Marathon Petroleum Company  
J. Moore, Marathon Gallup Refinery  
H. Jones, Trihydro Corporation  
S. Crouch, DiSorbo Consulting, LLC

**RESPONSE TO COMMENTS**  
**March 4, 2021 Approval with Modifications –**  
**Revised Investigation Work Plan North Drainage Ditch Area**  
**(September 2019)**

**NMED Comment 1:**

The response to NMED's Disapproval Comment 2 states, “[t]he missing historic borings [01117-B1, 0117-B2, 648, 643, 649, 651, 652, 665, 656, 657, MP-4, MP-5, MP-9, B-1, and B-3] are included in Appendix B...” The boring logs are appropriately included in Appendix B; however, the Work Plan does not include a figure that identifies the location of the borings. Provide a figure that identifies the location of the historic borings.

**MPC Response 1:**

Figure 2 in the Work Plan has been revised to include the location of the historic borings. Attached to this correspondence is a copy of Figure 2.

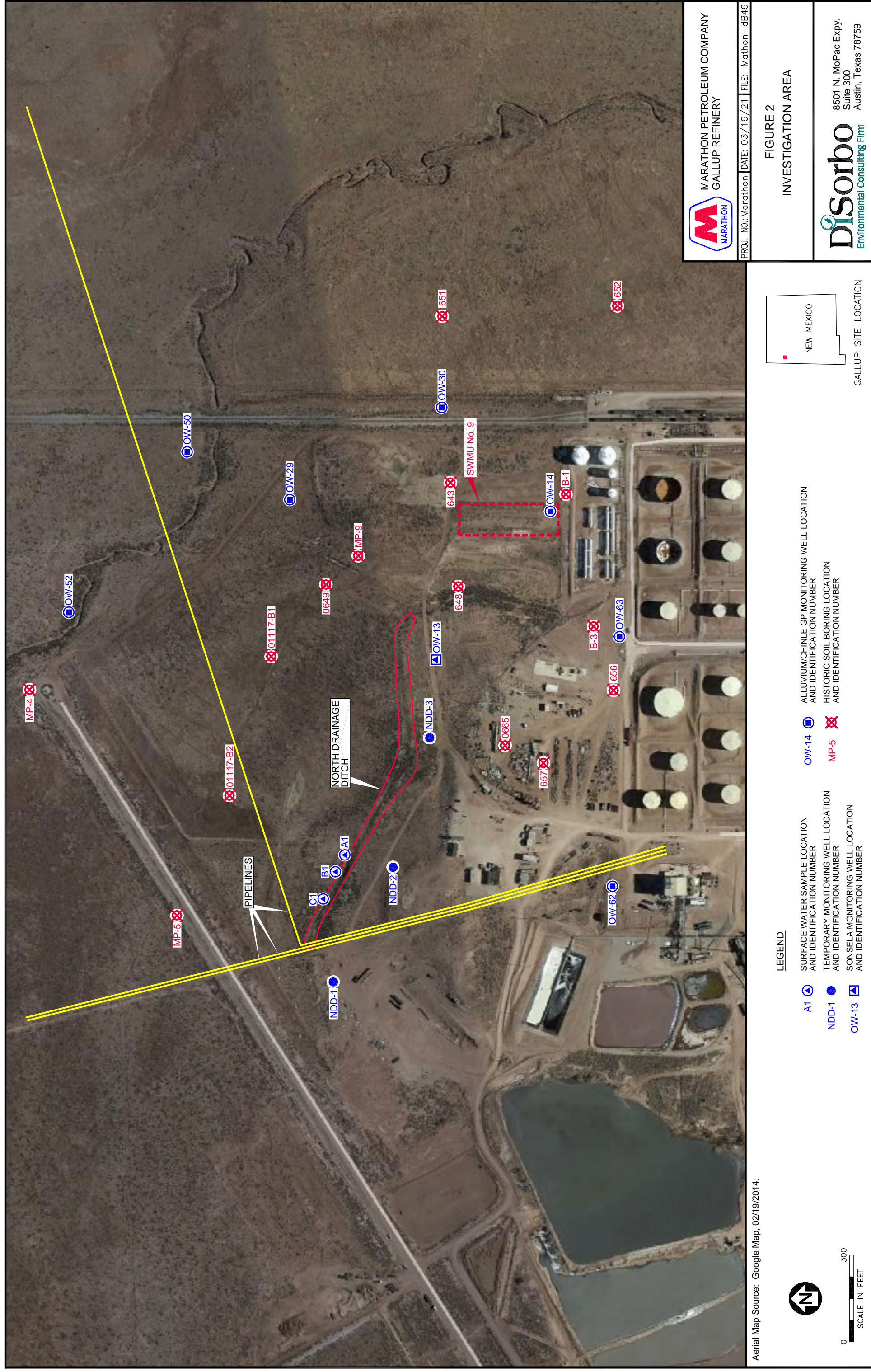
**NMED Comment 2:**

The response to NMED's Disapproval Comment 12 states, “we acknowledge the comment and will take this into consideration during report preparation as to which constituents are included in the data summary tables.” Note that NMED’s Disapproval Comment 12 does not allow the Permittee to selectively report detected constituents. All constituents detected above their corresponding detection limits must be identified in the data summary tables of the investigation report.

**MPC Response 2:**

The comment is acknowledged and Marathon will identify all constituents detected above their corresponding detection limits in the data summary tables of the investigation report.







**District I**

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

**District II**

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**District III**

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**District IV**

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

COMMENTS

Action 22371

**COMMENTS**

Operator:			OGRID:	Action Number:	Action Type:
WESTERN REFINING SOUTHWEST, IN	6700 Jefferson NE, Suite A-1	Albuquerque,	705791	22371	DISCHARGE
NM87109					PERMIT

Created By	Comment	Comment Date
cchavez	Permittee North Drain Ditch 3-29-2021	03/30/2021

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CONDITIONS

Action 22371

**CONDITIONS OF APPROVAL**

Operator:	OGRID:	Action Number:	Action Type:
WESTERN REFINING SOUTHWEST, IN NM87109	705791	22371	DISCHARGE PERMIT

OCD Reviewer	Condition
cchavez	None