

**Western Refining Southwest LLC**

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39
Jamestown, NM 87347

July 7, 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: Response to Disapproval
Response to Disapproval Investigation Report Solid Waste Management Units
(SWMU)
No. 4 Old Burn Pit and No. 5 Landfill Areas
Marathon Petroleum Company LP, Gallup Refinery
(dba Western Refining Southwest LLC)
EPA ID# NMD000333211
HWB-WRG-17-006**

Dear Mr. Pierard:

Marathon Petroleum Company LP (dba Western Refining Southwest LLC) Gallup Refinery (MPC) is submitting this *Response to Disapproval, Response to Comments Disapproval, Investigation Report Solid Waste Management Units (SWMU) No. 4 Old Burn Pit and No. 5 Landfill Areas*. A timeline of the reports and investigations for the burn pits and landfill areas is provided below.

- Investigation Work Plan, submitted June 24, 2014
- Disapproval, received August 17, 2015
- Response to Disapproval, submitted November 19, 2015
- Approval with Modifications, submitted April 18, 2016
- Investigation Report, submitted March 13, 2017
- Disapproval, received June 7, 2018
- Response to Disapproval, submitted October 19, 2018
- Disapproval, received March 15, 2021
- Response to Disapproval of October 2018, submitted June 30, 2021

If there are any questions, please call Mr. John Moore at (915) 775-7864.

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

Robert S. Hanks

Robert S. Hanks
Refinery General Manager

Enclosures

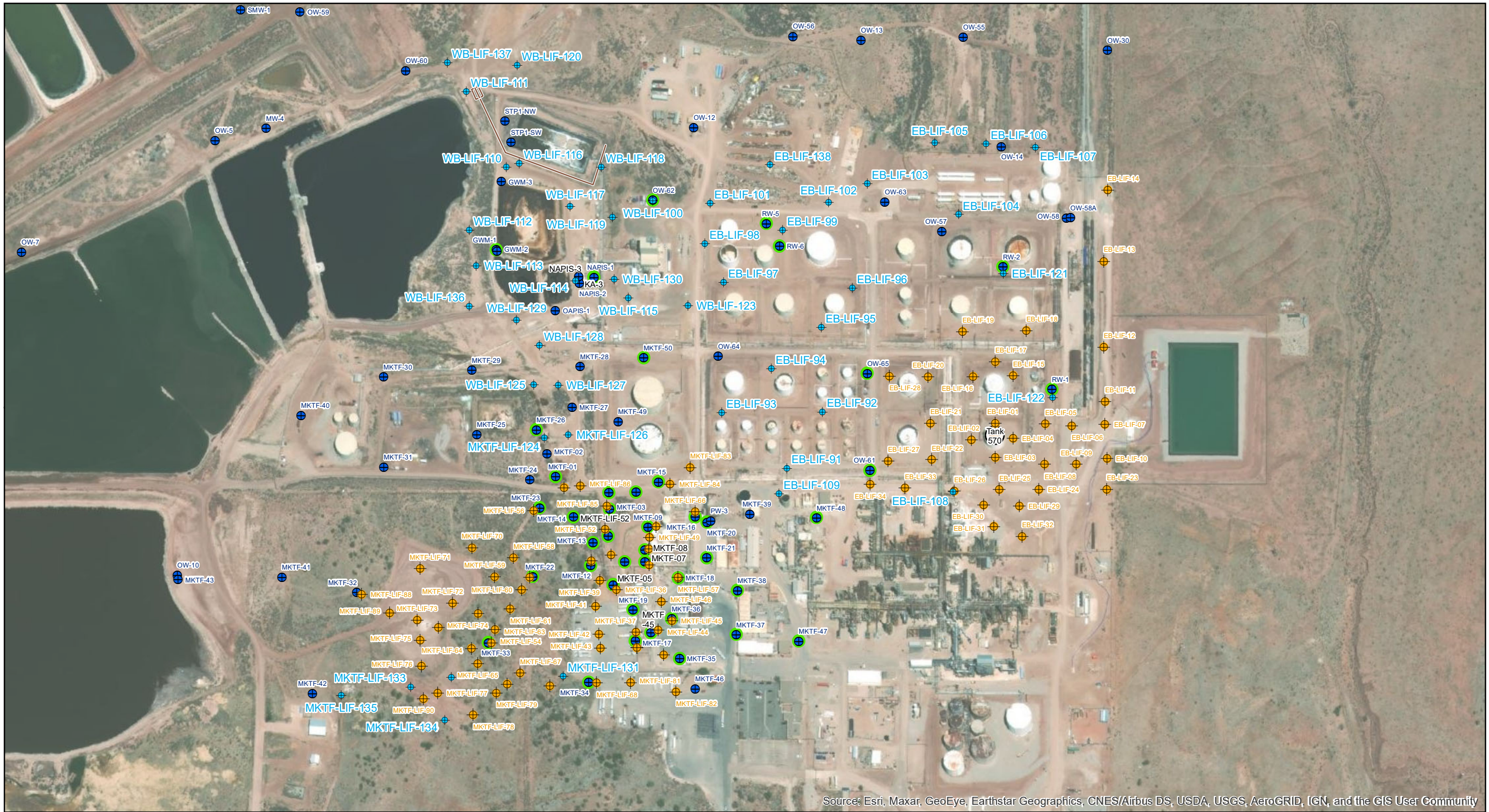
cc: D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
T. McDill, NMOCD
G. McCartney, Marathon Petroleum Corporation
K. Luka, Marathon Petroleum Corporation
J. Moore, Marathon Gallup Refinery
H. Jones, Trihydro Corporation

Attachment A: Response to Comments

New Mexico Environment Department (NMED) to Marathon Petroleum Company (MPC) Comment Letter “Disapproval Response to Disapproval Investigation Report Solid Waste Management Units (SWMU) No. 4 Old Burn Pit and No. 5 Landfill Areas” (March 4, 2021)

NMED Comments	MPC Responses
Comment 1:	Response 1:
<p>The Permittee only submitted the response to Comments 4 and 7 of the NMED’s June 7, 2018 Disapproval. There are total of eight comments to be addressed in the Disapproval and the response to other comments was not included in this submittal. Although the Response asserted that the revised Report would be submitted by December 14, 2018, the required submittal was not received. The June 7, 2018 Disapproval requires two hard copies, an electronic and a red-line strikeout (RLSO) version of the revised Report. The Permittee must provide the response to all NMED’s comments of the June 2, 2018 Disapproval, two hard copies and an electronic and a RLSO version of the revised Report no later than June 30, 2021.</p>	<p>This comment has been acknowledged. Marathon Petroleum Company (MPC) submitted the response to comments from the June 7, 2018 Disapproval, Investigation Report Solid Waste Management Units (SWMU) No. 4 Old Burn Pit and No. 5 Landfill Areas on June 30, 2021.</p>
Comment 2:	Response 2:
<p>The response to NMED’s Disapproval Comment 4 states, “[t]here is no storage, handling, processing or refining of petroleum hydrocarbons in the subject area.” In a response letter, explain whether the area in the vicinity of SWMUs 4 and 5 was potentially affected by recent releases (e.g., French Drain area). If recent releases potentially affected the area, propose to submit a work plan to recollect soil samples in SWMUs 4 and 5.</p>	<p>MPC does not propose recollecting soil samples in the Solid Waste Management Unit (SWMU) 4 and 5 area.</p> <p>In May 2021, MPC conducted a sitewide Laser Induced Fluorescence (LIF) Investigation. Based on the EB-LIF-138 log in the SWMU 4 area, minimal response was encountered indicating clean soil. In the surrounding area (including the French Drain), EB-LIF-101, EB-LIF-102, WB-LIF-110, WB-LIF-116, and WB-LIF-118 also show clean soil. The LIF locations and logs will be provided as an attachment in the Sitewide Laser Induced Fluorescence/Hydraulic Profiling (LIF/HP) Report, which will be submitted no later than October 31, 2021.</p> <p>Additionally, the north drainage ditch investigation is scheduled to be completed during summer 2021. The investigation is located near the SWMU 4 and 5 area. Temporary and permanent monitoring well installations, soil borings, and soil and groundwater sample collection are activities included in the north drainage ditch investigation. An investigation report summarizing the results will be submitted to NMED by December 31, 2021.</p>

Attachment B: LIF Locations and Logs



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

EXPLANATION

- | | | | |
|--|------------------------|--|--------------|
| | PROPOSED LIF LOCATIONS | | FRENCH DRAIN |
| | ORIGINAL LIF LOCATIONS | | TANK 570 |
| | MONITORING WELLS | | |
| | SPH DETECTED IN 2020 | | |

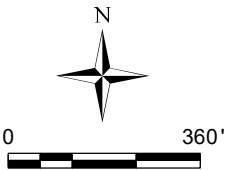
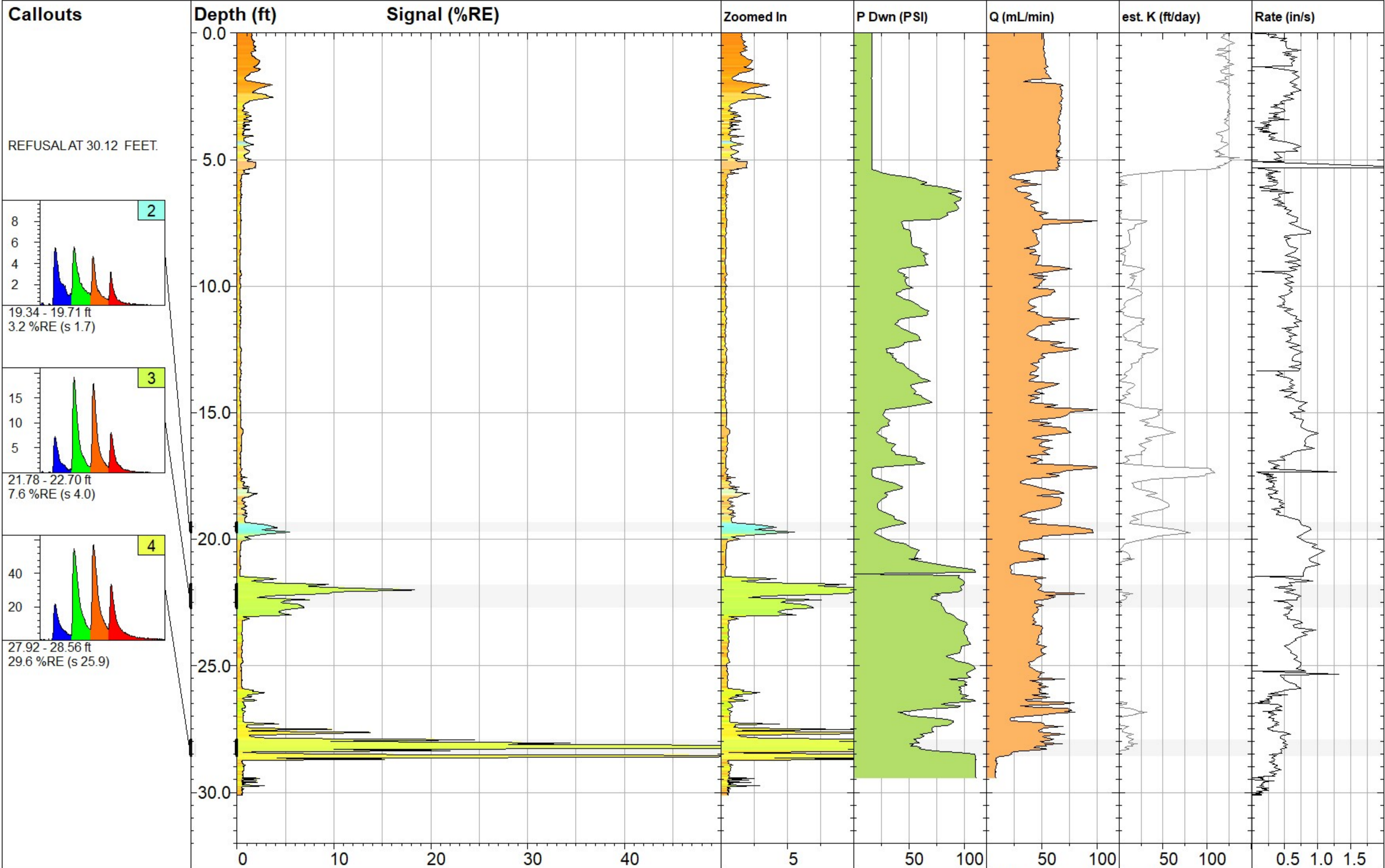


FIGURE 1

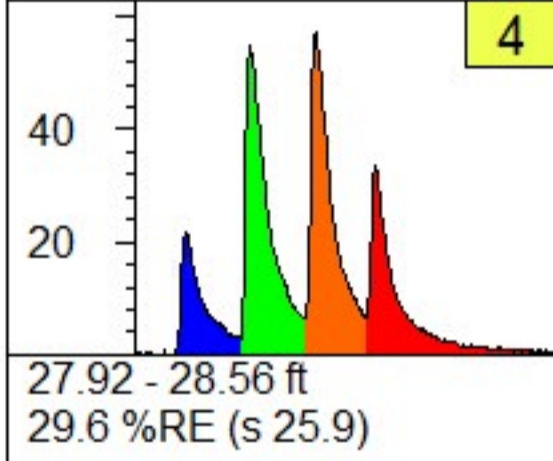
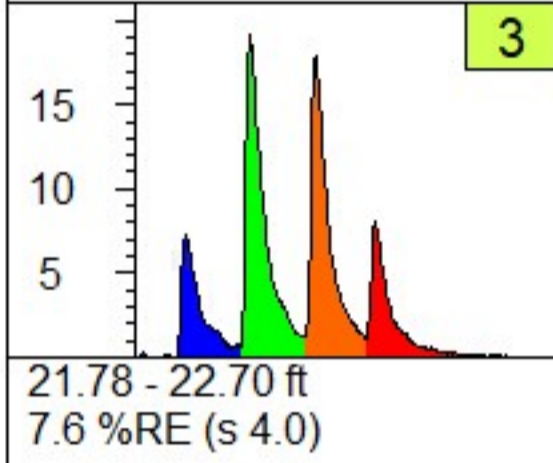
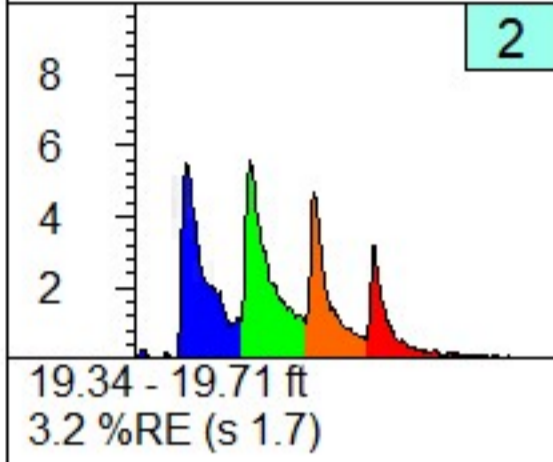
**PROPOSED LIF SAMPLE LOCATIONS
MARKETING TANK FARM/LOADING RACK**


**MARATHON PETROLEUM COMPANY
GALLUP REFINING DIVISION
GALLUP, NEW MEXICO**

Drawn By: KEJ Checked By: PH Scale: 1" = 360' Date: 4/22/21 File: 1_LIF_EB_TankFarm>LoadingRack_Mar2021_Fig1.mxd




REFUSAL AT 30.12 FEET.



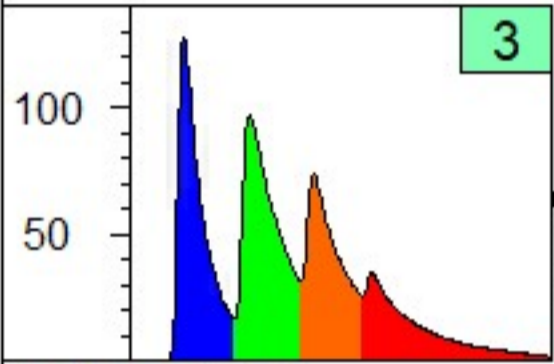
 www.DAKOTATECHNOLOGIES.COM	EB-LIF-101		UVOST® By Dakota www.DakotaTechnologies.com	
	Site: Marathon Gallup Refinery	Y Coord.(Lat/North): Unavailable	Final Depth: 30.12 ft	
	Client / Job: Trihydro / 0049B.21	X Coord.(Long/East): Unavailable	Max Signal: 77.5 %RE @ 28.17 ft	
	Operator / Unit: BG / UVOST1612	Elevation: Unavailable	Date & Time: 2021-05-11 08:22 MDT	



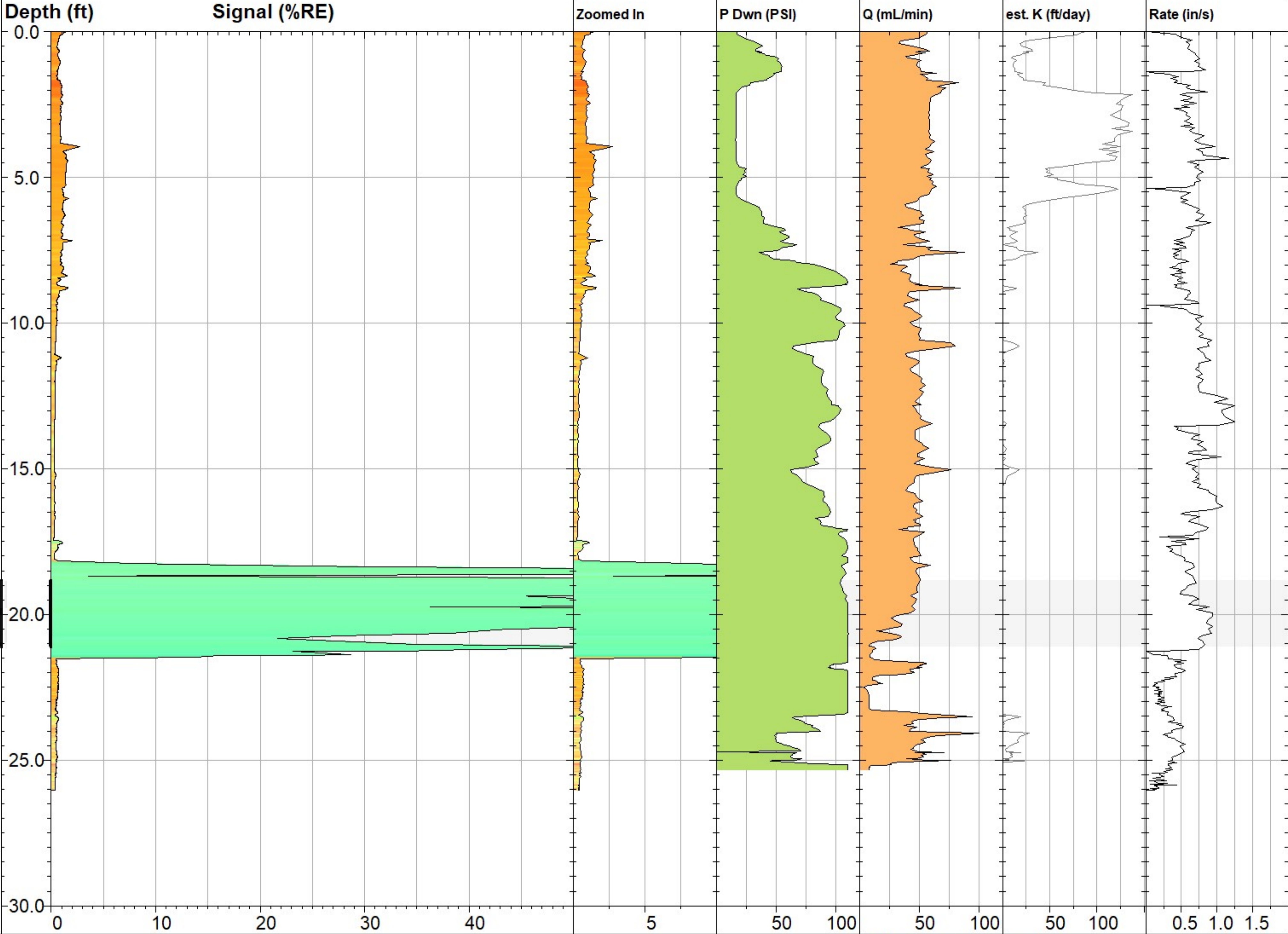
 www.DAKOTATECHNOLOGIES.COM	EB-LIF-102			UVOST® By Dakota www.DakotaTechnologies.com	
	Site: Marathon Gallup Refinery	Y Coord.(Lat/North): Unavailable		Final Depth: 28.65 ft	
	Client / Job: Trihydro / 0049B.21	X Coord.(Long/East): Unavailable		Max Signal: 5.8 %RE @ 5.44 ft	
	Operator / Unit: BG / UVOST1612	Elevation: Unavailable		Date & Time: 2021-05-10 13:29 MDT	

Callouts

REFUSAL AT 26.03 FEET.



18.83 - 21.11 ft
80.7 %RE (s 48.7)



WWW.DAKOTATECHNOLOGIES.COM

EB-LIF-103

Site:
Marathon Gallup Refinery

Client / Job:
Trihydro / 0049B.21

Operator / Unit:
BG / UVOST1612

Y Coord.(Lat/North):
Unavailable

X Coord.(Long/East):
Unavailable

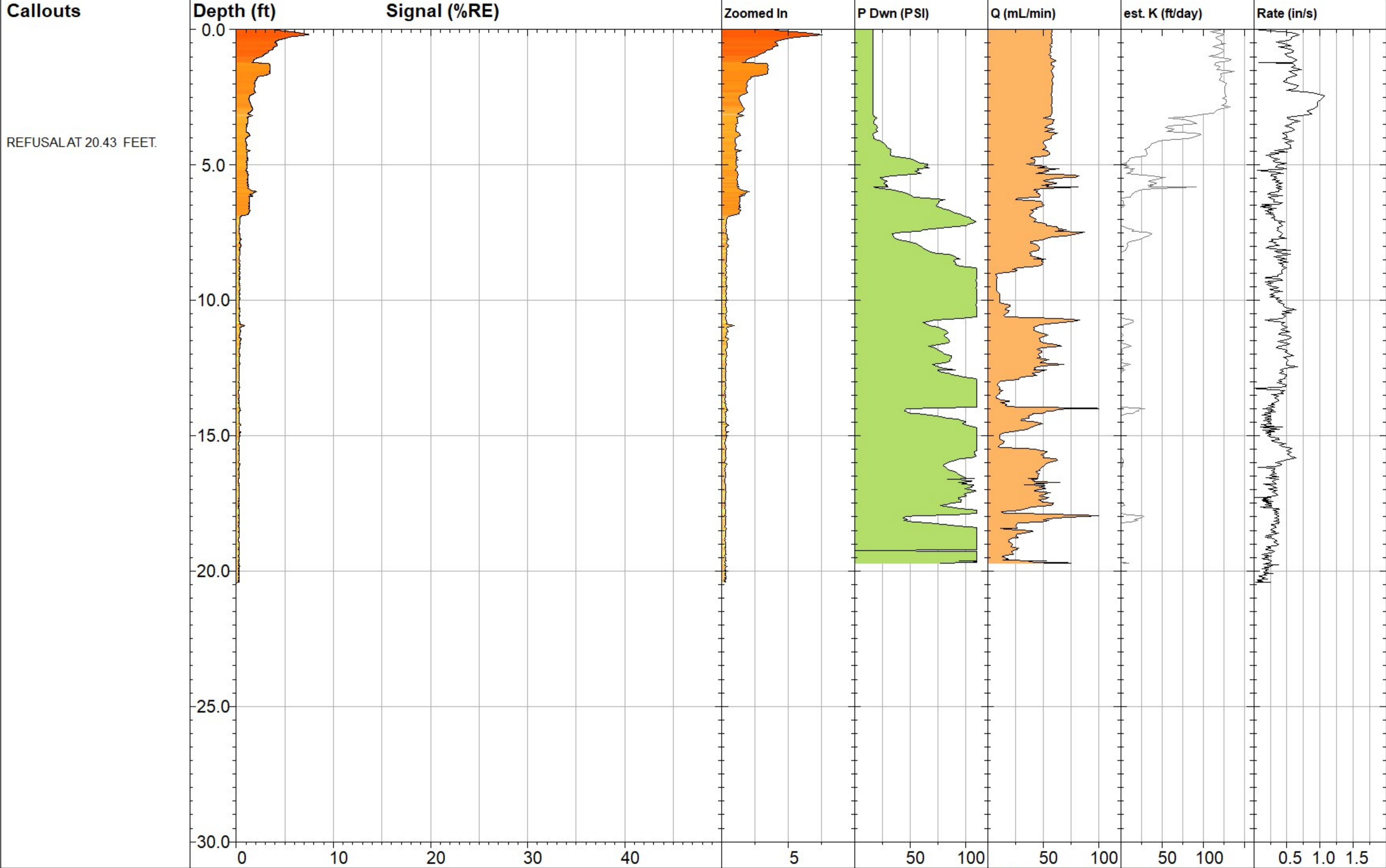
Elevation:
Unavailable

UVOST® By Dakota
www.DakotaTechnologies.com

Final Depth:
26.03 ft

Max Signal:
174.3 %RE @ 19.00 ft

Date & Time:
2021-05-10 14:11 MDT



WWW.DAKOTATECHNOLOGIES.COM

EB-LIF-138

Site:
Marathon Gallup Refinery

Client / Job:
Trihydro / 0049B.21

Operator / Unit:
BG / UVOST1612

Y Coord.(Lat/North):
Unavailable

X Coord.(Long/East):
Unavailable

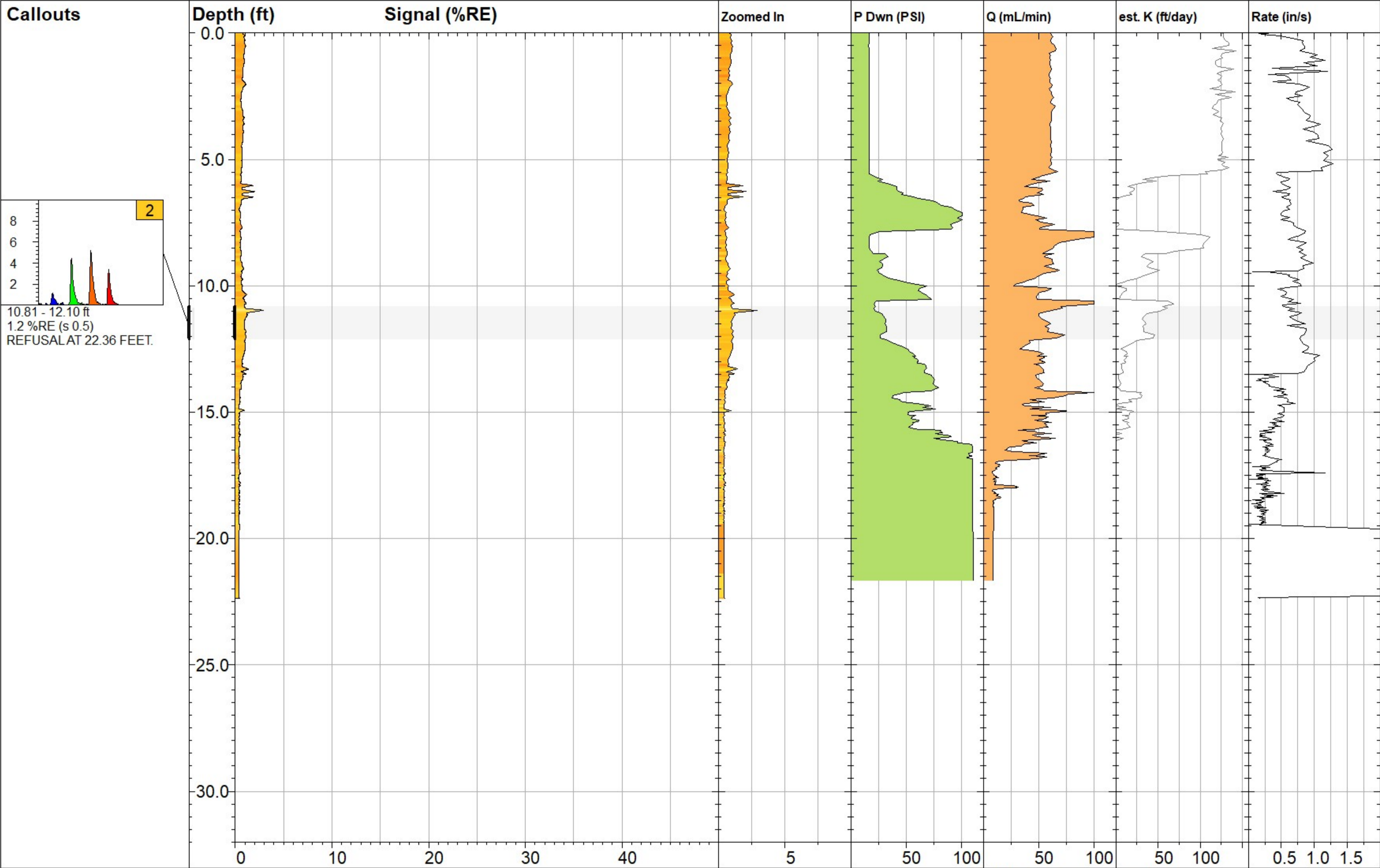
Elevation:
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UVOST® By Dakota
www.DakotaTechnologies.com

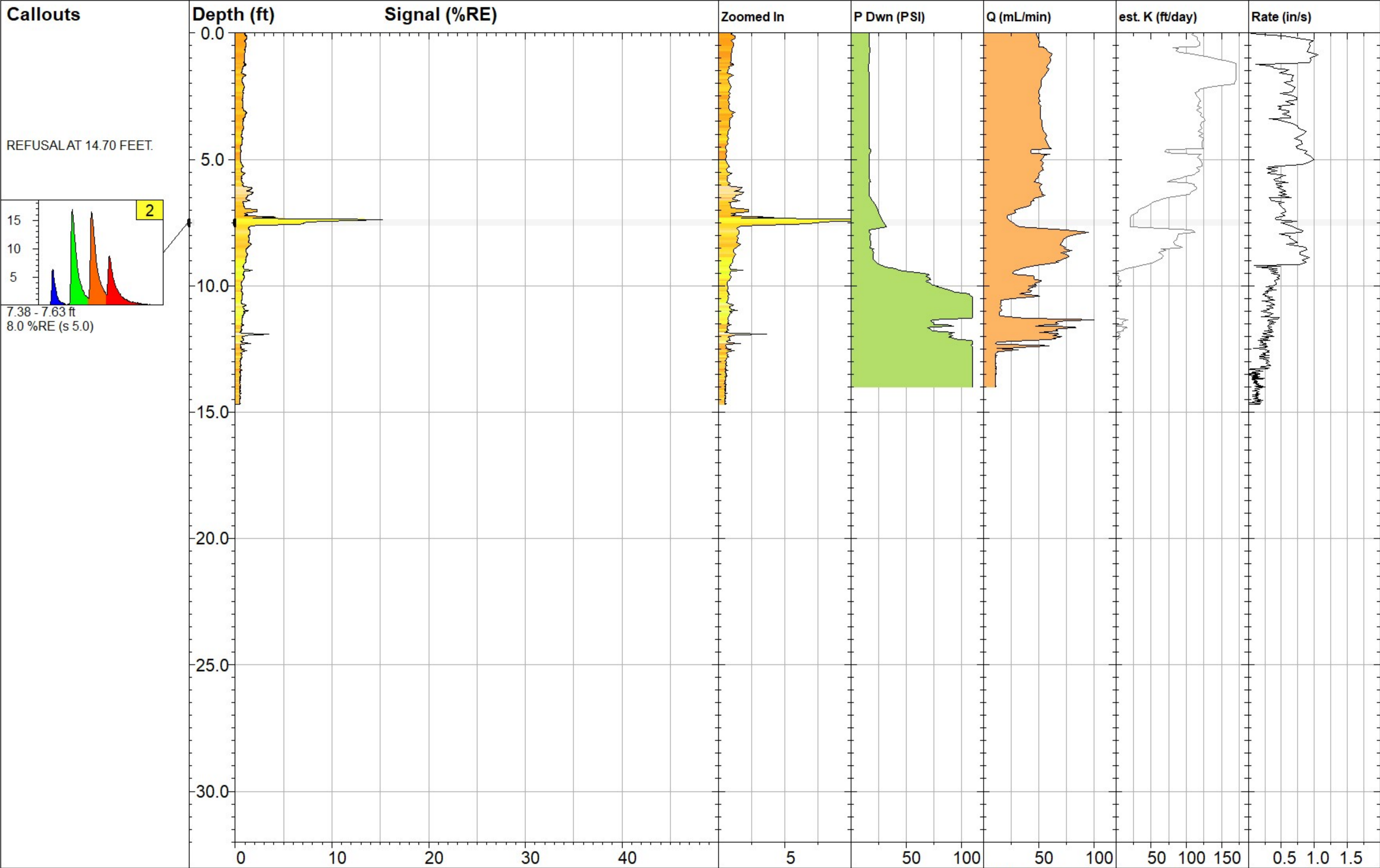
Final Depth:
20.43 ft

Max Signal:
7.5 %RE @ 0.19 ft

Date & Time:
2021-05-10 14:52 MDT



<div><div><div><div></div></div><div>DAKOTA</div><div>TECHNOLOGIES</div></div><div>www.DAKOTATECHNOLOGIES.COM</div></div>	WB-LIF-110			UVOST® By Dakota	
	www.DakotaTechnologies.com				
	Site: Marathon Gallup Refinery		Y Coord.(Lat/North): Unavailable	Final Depth: 22.36 ft	
	Client / Job: Trihydro / 0049B.21		X Coord.(Long/East): Unavailable	Max Signal: 2.9 %RE @ 10.97 ft	
Operator / Unit: BG / UVOST1612		Elevation: Unavailable		Date & Time: 2021-05-11 14:57 MDT	



WWW.DAKOTATECHNOLOGIES.COM

WB-LIF-116

Site:
Marathon Gallup Refinery

Client / Job:
Trihydro / 0049B.21

Operator / Unit:
BG / UVOST1612

Y Coord.(Lat/North):
Unavailable

X Coord.(Long/East):
Unavailable

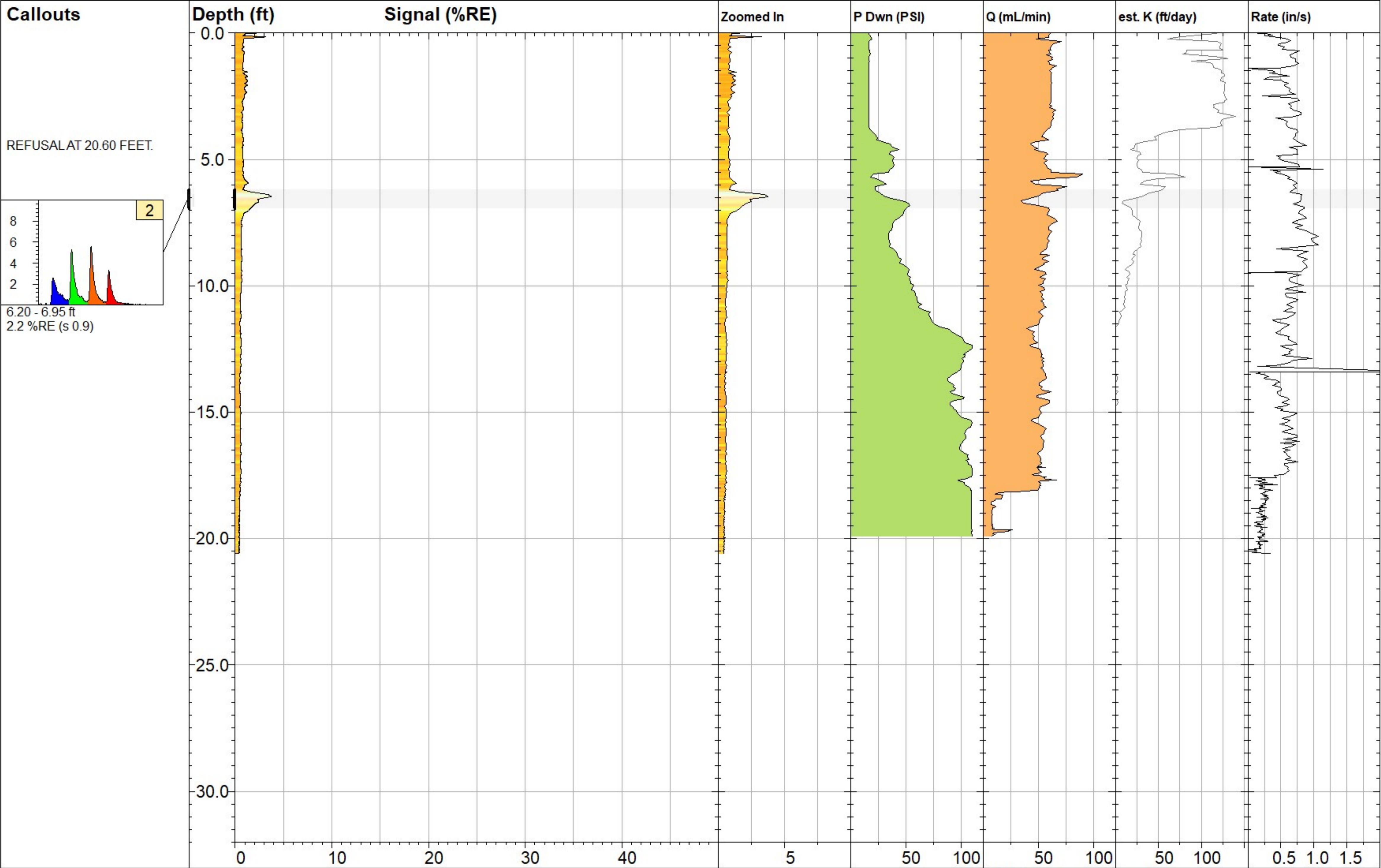
Elevation:
Unavailable


UVOST® By Dakota
www.DakotaTechnologies.com

Final Depth:
14.70 ft

Max Signal:
15.4 %RE @ 7.38 ft

Date & Time:
2021-05-11 14:17 MDT



 www.DAKOTATECHNOLOGIES.COM	WB-LIF-118			UVOST® By Dakota www.DakotaTechnologies.com	
	Site: Marathon Gallup Refinery	Y Coord.(Lat/North): Unavailable		Final Depth: 20.60 ft	
	Client / Job: Trihydro / 0049B.21	X Coord.(Long/East): Unavailable		Max Signal: 3.7 %RE @ 6.48 ft	
	Operator / Unit: BG / UVOST1612	Elevation: Unavailable		Date & Time: 2021-05-11 15:31 MDT	

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 36171

CONDITIONS

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 36171
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
jburdine	Accepted for Record Retention Purposes-Only	11/22/2022