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**Western Refining Terminals, LLC**

539 S Main Street  
Findlay, OH 45840  
Tel: 419.422.2121

November 28, 2022

Mr. Rick Shean, Chief  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303

**RE: Response to Disapproval Extension Request  
Area of Concern 15 – New API Separator and Area of Concern 16 – New API Separator  
Overflow Tanks Investigation Work Plan  
Western Refining Southwest LLC D/B/A Marathon Gallup Refinery  
EPA ID# NMD000333211  
HWB-WRG-20-003**

Dear Mr. Shean:

Western Refining Southwest LLC (D/B/A Marathon Gallup Refinery) (Western) is requesting an extension for submittal of the Response to Disapproval letter for the Area of Concern 15 – New API Separator and Area of Concern 16 – New API Separator Overflow Tanks Investigation Work Plan (Work Plan).

A timeline of the Work Plan is presented below:

- Investigation Report, submitted March 30, 2022
- *Disapproval*, received August 22, 2022

The original Work Plan proposed to complete a fluorescent dye tracer test in the New American Petroleum Institute Separator (NAPIS) to monitor the integrity of the secondary containment. In preliminary testing of the fluorescent properties of media around the NAPIS, it was determined that there is potential interference from separate phase hydrocarbon (SPH) impacts in soil and groundwater, and soil with impacts could fluoresce without the addition of the dye. Therefore, it can be difficult to discern if observed fluorescence is from pre-existing SPH impacts or a recently introduced dye. To evaluate if soil fluoresces in the area of the NAPIS bays prior to introduction of fluorescing dye, Western will be completing soil borings in 3 to 4 locations around the NAPIS and testing for fluorescence.

Western is requesting the extension of the Response to Disapproval from November 30, 2022 to March 15, 2022 to allow for the soil borings around the NAPIS to be completed and findings incorporated into a revised approach.

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If you have any questions or comments regarding the information contained herein, please do not hesitate to contact Mr. John Moore 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,

**Western Refining Southwest LLC, D/B/A Marathon Gallup Refinery**



Ruth Cade  
Vice-President

cc:	D. Cobrain, NMED HWB	M. Bracey, Marathon Petroleum Corporation
	L. Andress, NMED HWB	K. Luka, Marathon Petroleum Corporation
	L. Barr, NMOCD	J. Moore, Marathon Gallup Refinery
	L. King, USEPA Region 6	H. Jones, Trihydro Corporation

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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**

CONDITIONS

Action 161828

**CONDITIONS**

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 161828
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

**CONDITIONS**

Created By	Condition	Condition Date
scwells	Accepted for Record Retention Purposes-Only	11/28/2022