
Western Refining Terminals, LLC

539 S. Main Street
Findlay, Ohio 45840

Sent via email (Shelly.Wells@emnrd.nm.gov)

January 27, 2023

Shelly Wells
Oil Conservation District
EMNRD – Oil Conservation Division
1220 St. Francis Drive
Santa Fe, NM 87505

RE: Notice of 20.6.2 NMAC Compliance Requirements – Ground and Surface Water
Protection (natural gas plants)
Western Refining Terminals, LLC - Wingate Facility

Dear Ms. Wells:

Western Refining Terminals, LLC (Western Refining) is in receipt of New Mexico Oil Conservation District's (OCD) *Notice of 20.6.2 NMAC Compliance Requirements – Ground and Surface Water Protection* (dated October 3, 2022) issued to the Wingate Facility (Facility). According to OCD's notice, Wingate Facility is identified as a natural gas plant, and therefore required to submit a discharge permit application. The purpose of this correspondence is to advise OCD that the Facility is not a natural gas plant as described below. The Facility also does not currently contain possible sources of groundwater contamination and continues to comply with its Abatement Plan, AP-121, approved by OCD. Provided below is additional information pertaining to the Wingate Facility.


The natural gas liquids fractionation portion of the Facility was removed from operation under the New Mexico Environment Department Title V Operating Permit, NSR 1313-M6, issued October 9, 2015. As described in the Facility's current Title V Operating Permit P117-R3 (issued October 27, 2019), the fractionation operation equipment was decommissioned and the Facility does not meet the Code of Federal Regulations Chapter 40 (40 CFR) Part 60, Subpart KKK definition of a natural gas processing plant under 40 CFR 60.631. The function of the Facility is to receive isobutane/normal butane/mixed butane in railcars. The railcars are pressurized using purchased natural gas. All products are unloaded from railcar to storage tanks. During offloading, the storage tanks are vented to the flare. Isobutane storage is sent via pipeline to the Marathon Gallup Refinery.

Additionally, although OCD allowed natural gas plant's Groundwater Discharge permits to expire in 2012, OCD transferred abatement activities from the Facility's Groundwater Discharge Permit (GW-054) to abatement plan case number AP-117 (now assigned as AP-121) on April 2,

2012. Accordingly, Western Refining continues to perform remediation and monitoring activities at the site under AP-121 in compliance with the New Mexico Administrative Code 20.6.2. Pursuant to AP-121, Western Refining is required to notify OCD of the discovery of phase-separated hydrocarbons or exceedances of a Water Quality Control Commission standard and report remediation and monitoring activities annually to OCD.

Based on the information provided above, Western Refining does not believe it has the potential to discharge a water contaminant so as to require a groundwater discharge permit. If you have any questions or comments regarding the information contained herein, please do not hesitate to contact John Moore at (505) 879-7643.

Sincerely,
Western Refining Terminals, LLC



Timothy Peterkoski
Environmental and Climate Strategy Director

cc: K. Luka, Marathon Petroleum Company
J. Moore, Marathon Gallup Refinery and Wingate Facility

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1625 N. French Dr., Hobbs, NM 88240
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District II
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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 180388

CONDITIONS

Operator: WESTERN REFINING COMPANY L.P. 123 W. Mills Ave. El Paso, TX 79901	OGRID: 264727
	Action Number: 180388
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
scwells	Accepted for Record Retention Purposes-Only	1/27/2023