
Western Refining Terminals, LLC

539 S Main Street
Findlay, OH 45840
Tel: 419.422.2121

April 28, 2023

Mr. Dave Cobrain, Interim 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. Cobrain:

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
- Request for Extension, submitted November 28, 2022
- Request for Extension, submitted February 8, 2023

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 completed soil borings in 5 locations around the NAPIS and testing for fluorescence.

Western requested an initial extension to March 15, 2023 to allow for the soil borings around the NAPIS to be completed and findings incorporated into a revised approach. The soil investigation was scheduled to take place the week of December 19, 2022, however, the drilling was unable to be completed.

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Drilling was completed the week of February 13, 2023. The results from the drilling activities were presented to NMED in a virtual meeting on April 6, 2023. The results indicated that the soil fluoresced without the introduction of dye in the area. Western presented a different approach to NMED and is revising the Work Plan to reflect that approach. In order to finalize the revised Work Plan, Western is requesting the extension of the Response to Disapproval from April 30, 2023 to May 31, 2023.

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



Timothy J. Peterkoski
Director, Environmental Auditing & Processes

cc: L. Andress, NMED HWB
J. Moore, Marathon Gallup Refinery
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Energy, Minerals and Natural Resources
Oil Conservation Division
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CONDITIONS

Action 211718

CONDITIONS

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 211718
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
scwells	Saved for Records Retention Purposes Only	4/28/2023