

**Alba, Teresa**

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**From:** Hinkins, Case  
**Sent:** Thursday, July 10, 2025 4:25 PM  
**To:** Chavez, Carl, EMNRD  
**Cc:** Alba, Teresa; Holder, Mike  
**Subject:** Follow-Up Notification – July 5, 2025 Discharge Event at HFSinclair Navajo Refining Artesia Refinery

Good afternoon,

This email serves as a follow-up to the original discharge notification sent on July 5, 2025, regarding a discharge event at the HFSinclair Navajo Refining Artesia Refinery (Navajo). This notification pertains to a discharge regulated by the OCD permits for our four (4) Class I underground injection control (UIC) wells.

This notice is provided in accordance with:

- Section 2.F of the Refinery's December 2017 Class I Non-Hazardous Injection Well Discharge Permits for UICI-8-1, UICI-8-2, UICI-8-3, and UIC-8-4 (i.e., WDW-1 through WDW-4) and,
- Section 1.5.13.c of RCRA Permit No. NMD048918817.

**Summary of the Event**

On the morning of July 5, 2025, internal laboratory analysis of treated wastewater discharged to Wells 1, 2, 3, and 4 indicated a benzene concentration of **0.645 parts per million (ppm)** in a sample collected at 12:00 AM. This value exceeds the Toxicity Characteristic Leaching Procedure (TCLP) under the RCRA program and the underground injection wells permit limit of **0.5 ppm**.

A follow-up sample collected at 2:00 AM showed benzene levels of **0.357 ppm** indicating that any potential noncompliance was resolved within two hours of the initial sample.

The discharge consisted of typical refinery treated wastewater. The total volume and quantity of the release were **60,000 gallons and 0.073 lbs** of benzene in the discharge in excess of the permitted limit. No material was recovered. The discharge is not expected to pose a risk to human health or the environment, either on-site or off-site. Upon injection, the wastewater is significantly diluted within the underground formation where the Class I wells are located. This was a one-time, short-duration event.

**Operational Context and Mitigation**

At the time of the event, the refinery was operating a carbon filtration system to reduce benzene concentrations in the wastewater. This system was confirmed to be operational both before and after the sample was taken. No operational changes were made in response to the event, although upstream sources that discharge water to the wastewater plant were checked to ensure that they were working as designed and within operational parameters. The sample was analyzed generally in accordance with EPA Method 8021B by Navajo's internal lab. However, it was collected for internal operational purposes and not under compliance sampling protocols. Specifically, the sample was not cooled to -10°C to -20°C in the field as required by the method. This deviation from the standard method may have led to an artificially elevated benzene reading due to volatilization into the sample headspace. All compliance samples submitted to OCD under our quarterly monitoring and reporting requirements have adhered to EPA Method 8021B and have remained within permitted limits. This event will be included in our quarterly report.

**Ongoing Monitoring**

Subsequent wastewater samples have shown benzene concentrations below 0.5 ppm since the 12:00 AM sample on July 5, 2025. No further exceedances have been observed, and none are anticipated as a result of this event.

**Contact Information**

**Facility Address:**

Sinclair Navajo Refining Artesia Refinery  
501 E Main Street  
Artesia, New Mexico 88210

**Facility Contact:**

Travis Gibb  
501 E Main Street  
Artesia, NM 88210  
Phone: 575-746-5361

**Owner/Operator:**

HF Sinclair Navajo Refining Company, LLC  
2323 Victory Avenue, Suite 1400  
Dallas, Texas 75219

Please let us know if you require any additional information or clarification.

Case Hinkins  
Environmental Manager  
HFSinclair Navajo Refining LLC.  
575-247-5262

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
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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**

QUESTIONS

Action 486578

**QUESTIONS**

Operator: HF Sinclair Navajo Refining LLC ATTN: GENERAL COUNSEL Dallas, TX 75201	OGRID: 15694
	Action Number: 486578
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

**QUESTIONS**

Prerequisites	
Incident ID (n#)	nAPP2518666701
Incident Name	NAPP2518666701 HF SINCLAIR NAVAJO REFINING LLC @ 0
Incident Type	Release Other
Incident Status	Initial C-141 Received

**Location of Release Source***Please answer all the questions in this group.*

Site Name	HF Sinclair Navajo Refining LLC
Date Release Discovered	07/05/2025
Surface Owner	Private

**Incident Details***Please answer all the questions in this group.*

Incident Type	Release Other
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

**Nature and Volume of Release***Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.*

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Other   Refinery   Produced Water   Released: 0 BBL (Unknown Released Amount)   Recovered: 0 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	This morning on July 5, 2025, we received internal laboratory analytical results for our wastewater discharges to UIC Wells 1, 2, 3 & 4. These results showed Benzene at 645 Parts per Billion (PPB) or 0.645 Parts per Million (PPM) in a sample taken at 12:00 AM on 7/5/2025. This result is slightly above the TCLP and UIC-permit specified limit 0.5 PPM. The subsequent re-sample at 2:00 AM showed that benzene levels were less than 500 PPB (0.5 PPM). We are still evaluating the laboratory results to determine whether they are accurate and valid and, if so, why the benzene levels were higher than usual. The discharge consisted of refinery wastewater, and its composition was generally the same as our typical refinery wastewater. The estimated volume of the discharge on the day(s) in question is not yet known. The discharge is not expected to cause any damage. Upon injection, the wastewater is highly diluted in the underground formation where the Class I wells are located. Therefore, no immediate corrective or abatement actions are contemplated. We are reporting out of abundance of caution as we continue our investigation and we will follow-up with more information per reporting requirements. We are still assessing the accuracy of the results to

determine their validity. If confirmed, we will investigate the cause of the elevated benzene levels. \*Please note that during the time of this submission, the OCD site was not allowing "Other" to be selected in the "Other Released Details" category (kept giving error messages). So in order to submit this NOR, "Produced Water" was selected as the released material. The actual material released was refinery wastewater.

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**QUESTIONS (continued)**

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<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

**Initial Response**

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement	Name: Teresa Alba Title: Environmental Supervisor Email: Teresa.Alba@HFSinclair.com Date: 07/18/2025
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QUESTIONS, Page 3

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**QUESTIONS (continued)**

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**QUESTIONS**

<b>Site Characterization</b>	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

<b>Remediation Plan</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	No
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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COMMENTS

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## COMMENTS

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## COMMENTS

Created By	Comment	Comment Date
cchavez	OCD appreciates the permittee's efforts to report the effluent exceedance under its WQCC Discharge Permit. Based on the resampling protocol and confirmation that the internal field sampling and analysis was not exceeding the discharge permit limit, the situation does not warrant a release report submittal under Oil & Gas Release Form C-141. The permittee may continue to operate under the permit guidelines. The OCD C-141 Form for an effluent exceedance and discharge into a permitted disposal zone under a WQCC UIC Class I Non-hazardous Injection Well Permit is not the process under the WQCC permit for an effluent exceedance. OCD does include conditions of approval for this Action ID# based on the effluent situation with Benzene and Permittee actions to verify or confirm that an exceedance actually occurred. OCD is working to schedule a meeting at the end of August to communicate with the permittee and reach consensus or agreement on similar future effluent scenarios.	8/1/2025
cchavez	C-141 Incident # nAPP2518666701 is being processed by the OCD Environmental Bureau based on the situation--CJC 8/1/2025.	8/1/2025

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CONDITIONS

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**CONDITIONS**

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cchavez	The effluent exceedance was "negative" based on the environmental resampling. Conditions of approval for future effluent exceedance issues are as follows: 1. HFNR shall follow all EPA QA/QC Sampling Requirements, i.e., preservatives, ice, etc. for delivery of properly containerized samples to their internal lab for testing. Regardless of when or where and for whom a sample is taken, HFNR is required to follow all EPA QA/QC Sampling and Analytical Requirements/Protocols. 2. Provide internal EPA QA/QC Chain-of-Custody and all associated lab results information, i.e., detection limits to OCD for Data Quality Objectives (DQO) assessment(s). 3. Provide official environmental analytical lab data results from their NELAC Laboratory to verify or confirm the results of the initial internal perceived effluent exceedance. 4. OCD is scheduling a communication meeting at the end of August 2025 to discuss effluent exceedance procedures, reporting under the WQCC Permit and other permit matters.	8/1/2025