

AP - 111

MEETINGS

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, September 25, 2018 10:21 AM
To: Moore, John
Subject: RE: Sanitary lagoon

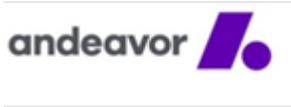
Thanks John.

From: Moore, John <John.Moore@andeavor.com>
Sent: Tuesday, September 25, 2018 10:11 AM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>
Subject: RE: Sanitary lagoon

Carl,

I agree and have a team to begin monitoring that starting today. I'll keep you updated if we see anything unusual.

John Moore, P.E.
Environmental Superintendent
Phone: (505) 722-0205
Mobile: (505)
John.Moore@andeavor.com



From: Chavez, Carl J, EMNRD [<mailto:CarlJ.Chavez@state.nm.us>]
Sent: Tuesday, September 25, 2018 9:31 AM
To: Moore, John <John.Moore@andeavor.com>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>
Subject: RE: Sanitary lagoon

John:

Good morning. Thanks for the update.

Since there may still be discharges occurring at end of pipe, it may be a good idea to monitor any/all discharges while the system is disconnected to verify there is no leakage, etc. still occurring.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
Santa Fe, New Mexico 87505
Ph. (505) 476-3490
E-mail: CarlJ.Chavez@state.nm.us

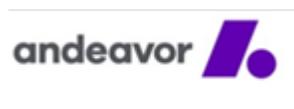
“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)

From: Moore, John <John.Moore@andeavor.com>
Sent: Tuesday, September 25, 2018 6:44 AM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us>
Subject: FW: Sanitary lagoon

Carl/Jim,

I just wanted to drop you a note and let you know that yesterday at 10:58 am we disconnected the water at the change house and it will remain disconnected until the plumbing issue can be resolved. We will operate that building on temporary facilities until that time. If you have any questions, please let me know.

John Moore, P.E.
Environmental Superintendent
Phone: (505) 722-0205
Mobile: (505)
John.Moore@andeavor.com



From: Chavez, Carl J, EMNRD [<mailto:CarlJ.Chavez@state.nm.us>]
Sent: Thursday, September 20, 2018 4:20 PM
To: Moore, John <John.Moore@andeavor.com>
Subject: RE: Sanitary lagoon

John:

Received. Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
1220 South St Francis Drive
Santa Fe, New Mexico 87505
Ph. (505) 476-3490
E-mail: CarlJ.Chavez@state.nm.us

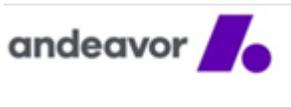
“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)

From: Moore, John <John.Moore@andeavor.com>
Sent: Thursday, September 20, 2018 4:17 PM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Subject: Sanitary lagoon

Carl,

As we discussed, we have decided to halt all water flow to the change house that appears to be the source of water into the sanitary lagoon that is a point of concern for the Oil Conservation Division. We will be renting a trailer shower/ bathroom to place at the change house and will utilize this until the appropriate plumbing connections can be made to route the flow from the change house to the correct location. It is anticipated that the portable unit will be onsite in the next couple of days and at that time we will shut off the water to the change house. I appreciate you letting me know the divisions concerns with this issue and I will strive to help in any way I can. If you have any questions, or would like any further information, please let me know.

John Moore, P.E.
Environmental Superintendent
Andeavor – Gallup Refining
92 Giant Crossing Road
Gallup, NM 87301
Phone: (505) 722-0205
Mobile: (505)
Fax: (505) 722-0268
John.Moore@andeavor.com



Subject: Quarterly Meeting with NMED-HWB
Date: September 19, 2018
Time: 0900 – 1200 (MST)

OCD 3rd Floor Conference Room

(Wendell Chino Building)

(1220 South St. Francis Dr., Santa Fe, NM 87505)

WebEx or Conference: 1-888-742-8686 Code: 3414502247
<https://tsocorp.webex.com/meet/W038442>

Expected Attendees: John Keiling (NMED- HWB), Kristen VanHorn (NMED- HWB), Jim Griswald (OCD-EB), Carl Chavez (OCD-EB), Allen Hains (Andeavor Corp-Remediation), Jessica O'Brien (Andeavor Corp-Environmental), Brian Moore (Gallup Refinery), John Moore (Gallup Refinery), (AndeavorScott Crouch (Consultant, Gallup Refinery), John Billiard (Consultant, Gallup Refinery);

Via Conference Call: Chris Winsor (Andeavor Corp-Remediation); Treena Piznar (Andeavor Corp-Environmental); Joel Dougherty (EPA Region VI)

Agenda (Items for Discussion)

1. Aeration Lagoons (SWMU 1) Closure Plan
 - a. Review the January 24, 2017 Disapproval Letter of Work Plan. No later than Sep 21, 2018 propose new date for submittal of Revised Work Plan and Comments
 - b. NMED will send information about recent permit activity related to Option 2 (CAMU).
2. Evaporation Pond Berm Integrity
 - a. NMED discuss comments with author of Disapproval Letter dated August 22, 2016 and provide feedback to Gallup Refinery; request for extension will be submitted in accordance with such feedback and request for information
3. SWMU-10
 - a. Kristen follow-up on Comment #1 and other sources of GW contamination
 - b. Kristen follow-up with Michiya on Comment #5 related to smear zone
 - c. Gallup will note instances of data exceptions related to Comment #8
 - d. Gallup response will address comment #13 (Scott C.)
 - e. Gallup respond and denote that no underground pipeline was present per Comment #11
 - f. Gallup will include cumulative risk check after remediation activity is completed, unless the final RI Report indicates no further action is necessary (Comment #14)
4. Recovery Systems
 - a. Gallup & NMED review previous correspondence on current RW's and provide feedback to confirm necessary documentation
 - b. Gallup provide NMED with notification and pump specs/details and how system will function
5. Other OCD/NMED Concerns
 - a. Sanitary Lagoon discharge
 - i. Gallup with immediately discuss options to eliminate the Sanitary discharge (i.e. frac tanks, shut-in of sanitary source)
 - b. Gallup will review list of overdue Spill Reports and propose submittal dates
 - i. Tank 35 Overflow (July 29, 2018)
 - ii. RRR loading area release (May 6, 2018)
 - iii. Sour Naphtha release near Tank-567 (March 26, 2018)
 - iv. API Caustic pump hose from KOD tank (April 19, 2018)

Subject: Quarterly Meeting with NMED-HWB

v. Baker Tank ASO Release (need complete revised report that wasn't included with cover letter)

Additional Information (Elaboration of Discussion Items)

1.

ACTION ITEMS	OWNER/ PARTICIPANTS	DUE DATE

DRAFT

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, September 20, 2018 1:58 PM
To:
Cc:
Subject: FW: Tentative: Gallup Refinery Meeting (AP-111) w/ OCD/NMED/Western Refining (Andeavor/Marathon Oil Company) SANITARY LAGOON STATUS OF DISCHARGE BRIEFING

Jim and I attended the meeting yesterday with NMED and the Andeavor/Western Staff (Marathon Oil Company on 10/1/2018). Joel Dougherty with EPA (E-mail: dougherty.joel@epa.gov) listened by telephone for the entire 3-hr. meeting.

You may recall William Bailey (Environmental Manager) with Andeavor/Western was the manager having knowledge of the lagoon discharge and was first in communication with OCD on the sanitary lagoon. He was replaced by Jessica O'Brien who led the meeting, but she is now leaving to another company location, and John Moore, P.E. is the new Gallup Andeavor/Western Environmental Manager. He was in attendance at the meeting.

Per your directive, OCD inquired into the status of the Sanitary Lagoon discharge? The response was the "discharge is still occurring and had not been stopped."

Jessica showed a map with the sanitary pipeline supposed to be routed from the change house, and other nearby sanitary effluent sources to the lift station, but indicated after hydro excavation, the pipeline was not present. They are having difficulty hiring a plumber to complete the "as built" construction of the pipeline to connect to the sanitary lift station, which pumps to the Sanitary Treatment Pond (STP-1). The "Change House" etc. contributes in addition to sanitary effluent from toilets, gray water from showers associated with refinery operations and the fire station. OCD inquired about any wastewater that could be prevented from discharge, and it was determined that staff could be directed to other toilets, but showers are a safety and operations issue, which Allen Hains (Andeavor/Western) did not recommend stopping. OCD recommended use only as required by emergency(ies).

Scott Crouch (Andeavor/Western Environmental Consultant) referenced the Area of Concern (AOC 35) Work Plan (WP) that was delivered to NMED at the meeting. Scott indicated the sanitary lagoon pipeline after trenching is at least 15 ft. bgl, and he did not indicate standing water was in the trench constructed along the side of the pipeline. In the WP, monitor wells were proposed along the transect of the pipeline to determine if GW inundated the pipeline. Andeavor/Western asked why NMED requested monitor wells? OCD responded to check for point sources of contamination or confirm Andeavor/Western's prior response that it was pre-existing GW contamination in the area. OCD indicated it would prefer to see the sanitary effluent line removed and checked for point sources from holes, staining, etc. Allen Haines (Andeavor/Western) indicated they want to abandon the pipeline in place because there are so many lines running through the pipeline transect. NMED is reviewing the AOC 35 WP, and is having Michiya evaluate. Apparently, AOC 35 is used to address NMED correspondence on the Sanitary Lagoon. Scott indicated from dye testing, dye was detected downgradient from point of application, but the source of leakage was still not known, there investigation occurred where they had

access due to pre-existing equipment, infrastructure, etc. Sources could be sumps, line leakage....? There is a leak near the truck load out rack.

John Moore recommended stationing a frack tank at the sanitary lagoon "end-of-pipe" to address the discharge, and said he would address this today (9/20). OCD requested notification when this is completed. John Moore asked if future OCD correspondence was forthcoming, and Carl indicated it is "very likely."

Currently, Andeavor/Western is working to address the most recent NMED letter with OCD input on the sanitary lagoon. Andeavor/Western briefly mentioned the Sanitary Lagoon in its meeting minutes.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division
Energy Minerals and Natural Resources Department
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Santa Fe, New Mexico 87505
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"Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?" (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see "Publications"

When: Sep 19, 2018 9:00:00 AM

Where: OCD 3rd Floor Conference Room (1220 South St. Francis Dr., Santa Fe, NM 87505) Wendell Chino Building (PHONE: 505-476-3490)

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Tentative Date and Time for Meeting. Please forward to other attendees and let me know if this schedule does not work for you.

Agenda to follow.....

OCD has a large screen monitor USB plugin (bring your laptop), and large board in the conference room if parties need to present information.

Thank you.

From: VanHorn, Kristen, NMENV

Sent: Thursday, July 26, 2018 5:07 PM

To: Kieling, John, NMENV <john.kieling@state.nm.us<mailto:john.kieling@state.nm.us>>; Griswold, Jim, EMNRD <Jim.Griswold@state.nm.us<mailto:Jim.Griswold@state.nm.us>>; Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us<mailto:CarlJ.Chavez@state.nm.us>>; Suzuki, Michiya, NMENV <Michiya.Suzuki@state.nm.us<mailto:Michiya.Suzuki@state.nm.us>>

Subject: Andeavor meeting date and time

September 19, 2018 from 9:00am – 12:00 pm (MST)

It looks like the conference room here is reserved already. Could we meet at OCD's conference room?

Kristen Van Horn

2905 Rodeo Park Drive East

Building 1

Santa Fe, NM 87505

Phone: 505-476-6046

Kristen.VanHorn@state.nm.us<mailto:Kristen.VanHorn@state.nm.us>

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Thursday, September 20, 2018 4:20 PM
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John.Moore@andeavor.com

WRG Submittals

OW-14 Source Area Investigation Report (conducting additional work, request timeline for submittal)

SMW-2 Boundary Well Installation (conducting additional work, request timeline for submittal)

SWMU 4 and 5 WP for additional soil and groundwater work for a risk assessment August 29, 2018

AOC 35 Main Loading Rack, etc. August 30, 2018 (Permit date)

Spill reports -

Tank 35 Overflow July 29, 2018

RRR loading area release May 6, 2018

sour naphtha release near TK-567 March 26, 2018

API Caustic pump hose from KOD tank near flare April 19, 2018

ASO Caustic Release Report - cover letter but report never submitted

SWMU 10 Investigation Report Revision October 12, 2018