AP – 111

HYDROCARBON SEEP INTERIM MEASURES (SWMU No.12)

2019

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, April 2, 2019 11:23 AM
To: Griswold, Jim, EMNRD
Cc: 'Moore, John'; VanHorn, Kristen, NMENV
Subject: Gallup Refinery MKTF Group C Interim GW Recovery System Work Plan SWMU No.12

Jim:

Please click here to view the schematic for the recovery of PSHs in the Group C area of the Gallup Refinery.

True to Marathon Petroleum Company, L.P.'s (MPC) word at a past meeting in Santa Fe, the work plan shows they are addressing GW contamination at the facility. Looks good!

Way to go MPC!!!

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")**

Marathon Petroleum Company LP

Interim Groundwater Recovery System Work Plan

Gallup Refinery
92 Giant Crossing Road
Gallup, NM 87301
(505) 722-3833

Submitted: March 27, 2019

Marathon Petroleum Company LP

March 27, 2019

Mr. John E. Kieling
New Mexico Environmental Department
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505

Re: Interim Groundwater Recovery System Work Plan
Western Refining Southwest, Inc.
(dba Marathon Petroleum Company)
EPA ID # NMD000333211

Mr. Kieling:

Marathon Petroleum Company LP (Marathon) is providing the New Mexico Environmental Department (NMED) with this letter to describe an Interim Groundwater Recovery System Work Plan for consideration and approval. This Plan presents the proposed design and operation procedures pursuant to our meeting on Wednesday, March 20, 2019 at the NMED offices in Santa Fe, New Mexico. This system will be operated on an interim, seasonal basis to address groundwater impacts at the site until such time as an engineered system can be presented to the NMED for review and approval. The interim system will allow Marathon to reduce the migration of existing groundwater impacts until such time that a formal design has been approved for implementation by the NMED. The following sections provide a description of the proposed interim system and its operation.

Proposed Location of Initial Recovery Wells

The proposed interim groundwater recovery wells discussed in this letter will be located in the Group C Groundwater Monitoring area, which is located in the northeast quadrant of the refinery (see attached Facilities and Well Groups 2017 map). All recovery wells discussed in this proposed Plan will be constructed using existing groundwater monitoring wells (MWs) and wells currently designated as recovery wells (RWs). No new wells will be installed to operate this interim system.

The initial proposed recovery system will consist of recovery wells RW-1, RW-2, RW-5, RW-6, and monitoring wells OW-14, OW-58, OW-30, and OW-55.

Proposed Recovery Well Design

Each recovery well will be operated as an independent, closed system. The recovery wells will be constructed as illustrated in the attached figure entitled Proposed Interim Recovery Well Design. The tanks used to store the recovered fluids at each well will be monitored weekly for fluid levels, which will be measured and recorded to document the recovered volumes of water

and oil (if present in the well). The recovered fluids will be disposed of in the facility wastewater treatment system.

Recovery system tanks that are situated inside an existing tank berm (i.e., RW wells) will have sufficient secondary containment to account for the volume of oil/water contained in the recovery well storage tanks. Temporary storage tanks that are situated in areas that do not have secondary containment (i.e., OW wells) will either be double lined or have a secondary containment constructed around them that meets Spill Prevention Control and Countermeasure (SPCC) rule requirements.

As illustrated in the attached figure, Proposed Interim Recovery Well Design, each interim recovery well will be constructed using a pneumatic submersible pump which will be capable of pumping water to the storage tank at the rate which the aquifer will yield it. The power supply for each pneumatic pump will be a tank containing compressed nitrogen. The inert nitrogen gas will facilitate the pumping of the fluids from the recovery pump into the storage tank. The gas pressure in each nitrogen tank will be monitored weekly to ensure that there is adequate gas pressure to operate the pneumatic pump. As previously mentioned, prior to removing the fluid from each tank, fluid level(s) will be measured weekly for recordkeeping and reporting.

Each storage tank will be constructed with a fluid level monitoring system (see figure) that will shut the pump off if it reaches the sensor. Once the fluid is removed from the tank for disposal, the system will again be operable. Attached to the top of the well casing will be a small metal enclosure to house an integrated LED counter to measure and track the volume of liquid removed from the well(s). Also inside the enclosure will be a lithium battery to operate the counter. On the outside of the enclosure will be a solar panel to help keep the battery charged.

Interim Recovery System Reporting to NMED

Marathon will provide quarterly reports to the NMED documenting system operation and recovery volumes. Marathon will also periodically conduct groundwater level measurements on the monitoring wells in the vicinity of the recovery pumps to assess the establishment of a contaminant capture zone in the Group C Groundwater Monitoring Area. A potentiometric map will also be included with the Quarterly Reports to document the groundwater gradient

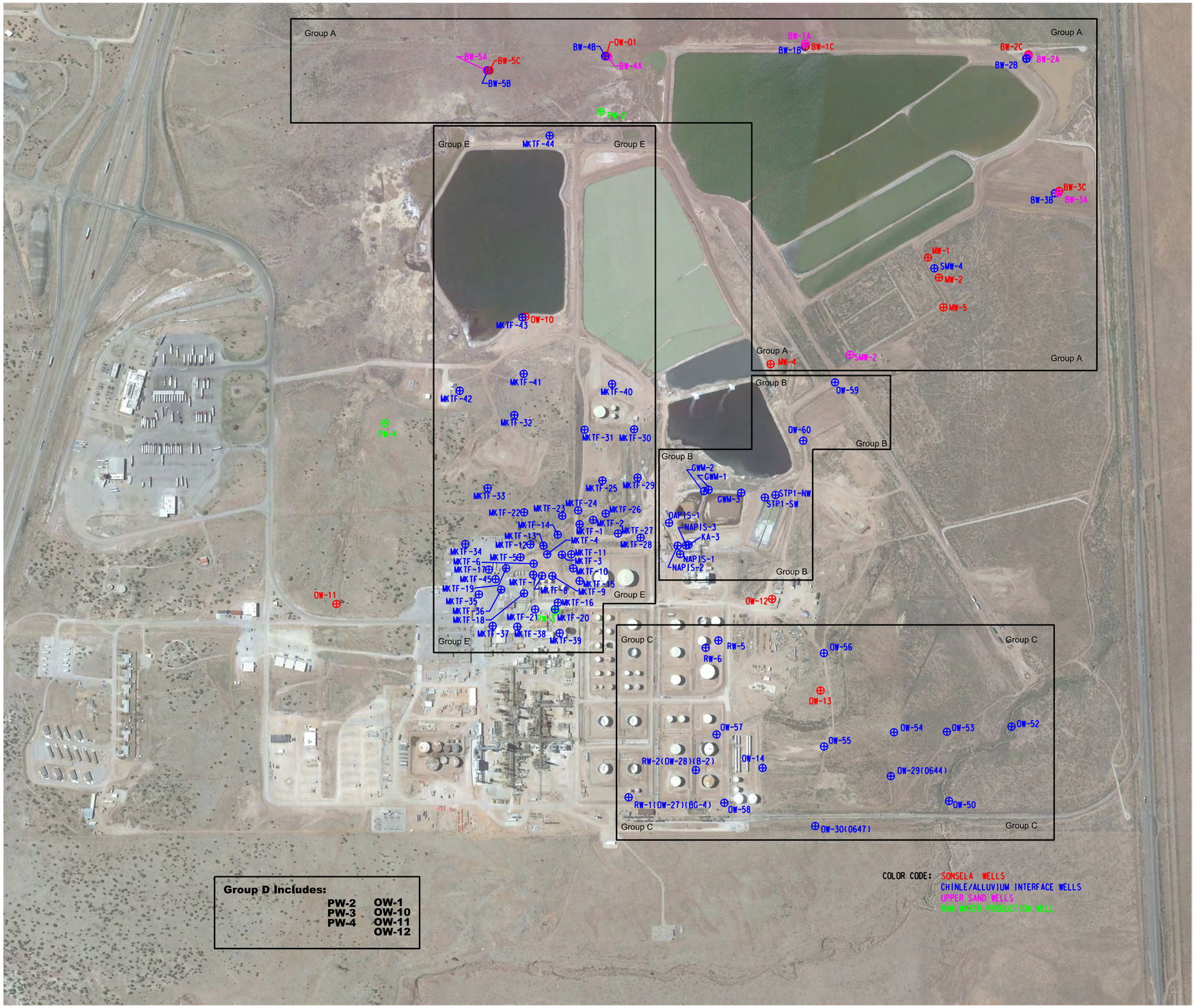
Marathon is prepared to initiate the operation of this interim groundwater recovery system upon approval by the NMED. If you have any questions or comments regarding this interim system, please do not hesitate to contact me at 505-726-9745.

Sincerely,
Marathon Petroleum Company LP

Brian K. Moore
Senior EHS Professional

Figures

1 Facilities and Well Groups – 2017
2 Proposed Interim Recovery Well Design



This Line is 1" on Original

intertek psi
4601 Ripley
El Paso, Texas 79922
915-584-1317

1"=500'

Project #: 06251565

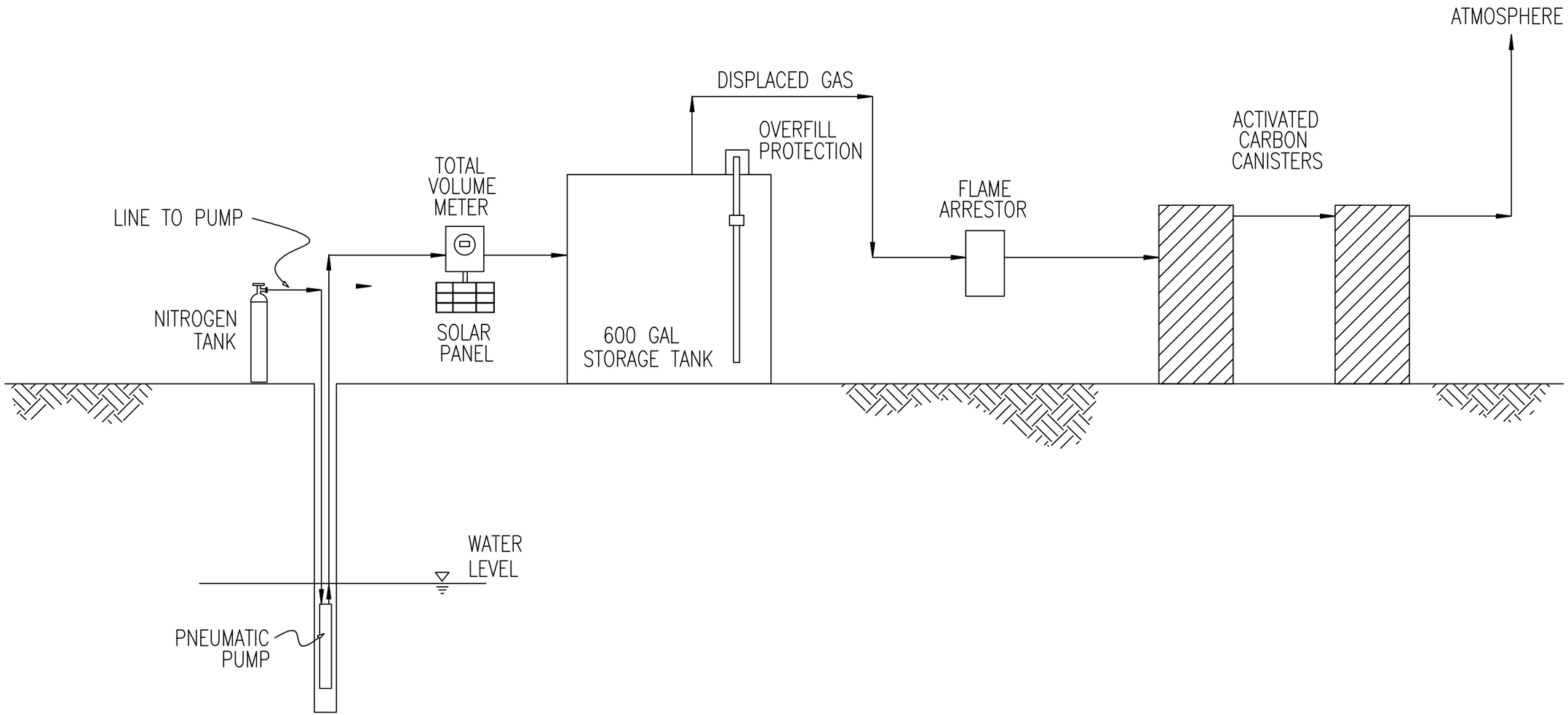
Figure 6

FACILITIES AND WELL GROUPS - 2017

MARATHON - GALLUP REFINERY

Marathon - Gallup Refinery
92 Giant Crossing Road
Gallup, New Mexico 87301

Date: November 16, 2018



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–	A	PROPOSED BLOCK FLOW DIAGRAM	---	AJA	3/26/19	–	–	–	–

SCALE: NTS	DATE
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CHK'D BY: –	–
APP'D. BY: –	–
ENGINEER: –	
AFE NUM: –	
MOC NUM: –	

PROPOSED INTERIM RECOVERY WELL DIAGRAM

Marathon Petroleum Company LP

DWG. FILE NAME: Z–32–001.dwg

DWG. NO. Z–32–001

REV. A