# **GW - 28**

# FACILITY WIDE GW MONITORING WORK PLAN

2019



June 25, 2019

Mr. John Kieling Chief, Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, New Mexico 87505

Mr. Carl Chavez New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

RE: Submittal of the 2019 Facility-Wide Groundwater Monitoring Work Plan for the HollyFrontier Navajo Refining LLC, Artesia Refinery RCRA Permit No. NMD048918817
Discharge Permit GW-028

Dear Mr. Kieling and Mr. Chavez:

Enclosed is the annual update to the Facility Wide Groundwater Monitoring Work Plan (FWGMWP) for the Artesia Refinery. This update has been prepared and is being submitted according to the requirements of the Post Closure Care Permit issued by the New Mexico Environment Department (NMED) Hazardous Waste Bureau. The FWGMWP also incorporates the requirements of the Discharge Permit issued by the New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division (OCD). The updated FWGMWP is being submitted in both hard copy and electronic format.

No substantial changes to the current facility-wide groundwater monitoring program have been proposed in the FWGMWP. If you have any questions or comments regarding this request, please feel free to contact me at 575-746-5487 or Robert Combs at 575-746-5382.

Sincerely,

Scott M. Denton Environmental Manager

HollyFrontier Navajo Refining LLC

cc: HollyFrontier: R. Combs, A. Sahba, J. Leik

TRC: J. Speer, C. Smith

File path: \Env\RCRA\Corrective Actions, Closure, and PCC\Annual GW Monitoring\FWGWMWP\2019

# 2019 Facility-Wide Groundwater Monitoring Work Plan

NMD048918817 and DP GW-028



# HollyFrontier Navajo Refining LLC Artesia Refinery Artesia, New Mexico

**June 2019** 

**Prepared for:** 

HOLLYFRONTIER
HollyFrontier Navajo Refining LLC
Artesia, New Mexico

Prepared by:

TRC Environmental Corporation
Austin, Texas

# 2019 Facility-Wide Groundwater Monitoring Work Plan NMD048918817 and DP GW-028

HollyFrontier Navajo Refining LLC Artesia Refinery Artesia, New Mexico

Prepared for:



HollyFrontier Navajo Refining LLC Artesia, New Mexico

Prepared by:



TRC Environmental Corporation Austin, Texas

TRC Project No. 330538

June 2019

**TRC Principal Lead** 

Julie Speer, Project Manager 1

### Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or 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.

Scott Denton

Environmental Manager, HollyFrontier Navajo Refining LLC

### **EXECUTIVE SUMMARY**

This 2019 Facility-Wide Groundwater Monitoring Work Plan (2019 FWGMWP) details the proposed groundwater monitoring program to be implemented at the HollyFrontier Navajo Refining LLC (Navajo) Artesia Refinery (Refinery) located at 501 East Main Street in Artesia, New Mexico. The Refinery is subject to (1) a Post-Closure Care Permit (PCC Permit) issued by the New Mexico Environment Department (NMED) in October 2003 and later modified in December 2010; and (2) the renewed Discharge Permit GW-028 issued by New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division (OCD) on May 25, 2017 and modified on June 29, 2017. Both the PCC Permit and Discharge Permit require Navajo to conduct facility-wide groundwater monitoring to evaluate the presence, nature, and extent of groundwater impacts. This 2019 FWGMWP details all groundwater monitoring activities that will be conducted to satisfy both the NMED PCC Permit and the OCD Discharge Permit upon approval by NMED and OCD.

This 2019 FWGMWP serves as the annual update to the facility-wide groundwater monitoring program required by Section 4.7.6.a of the modified PCC Permit. The groundwater monitoring program covers the following Refinery areas:

- The closed Tetra Ethyl Lead (TEL) Impoundment;
- The closed North Colony Landfarm (NCL);
- The inactive Evaporation Ponds (EP);
- Three Mile Ditch (TMD); and
- The vadose zone located beneath the Refinery.

This 2019 FWGMWP describes the procedures to be followed during routine groundwater monitoring activities across the Refinery areas, including well gauging, groundwater sampling, investigation-derived waste (IDW) management, decontamination, analytical requirements, and quality assurance/quality control (QA/QC) requirements.

No substantial changes to the current facility-wide monitoring program have been proposed in this 2019 FWGMWP.



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### LIST OF ACRONYMS AND ABBREVIATIONS

bgs below ground surface
COC Constituent of Concern

DO Dissolved Oxygen

DRO Diesel Range Organics
EP Evaporation Ponds

FWGMWP Facility-Wide Groundwater Monitoring Work Plan

GRO Gasoline Range Organics

HSWA Hazardous and Solid Waste Amendment

HWB Hazardous Waste BureauIDW Investigation-Derived Waste

mg/L Milligrams per liter

mL Milliliter

Navajo HollyFrontier Navajo Refining LLC

NCL North Colony Landfarm

NMAC New Mexico Administrative Code

NMED New Mexico Environment Department

OCD New Mexico Energy, Minerals and Natural Resources Department Oil

Conservation Division

ORP Oxidation-Reduction Potential

PCC Permit Post-Closure Care Permit

PIANO Paraffins, Isoparaffins, Aromatics, Naphthenes, and Olefins

PSH Phase-Separated Hydrocarbons

QA/QC Quality Assurance/Quality Control

RCRA Resource Conservation and Recovery Act

RFI RCRA Facility Investigation

RO Reverse Osmosis

SWMU Solid Waste Management Units

TDS Total Dissolved Solids

TEL Tetra Ethyl Lead
TMD Three Mile Ditch
TOC Top of Casing

VOCs Volatile Organic Compounds

WQCC Water Quality Control Commission



### 1.0 INTRODUCTION

This 2019 Facility-Wide Groundwater Monitoring Work Plan (2019 FWGMWP) details the proposed groundwater monitoring program to be implemented at the HollyFrontier Navajo Refining LLC (Navajo) Artesia Refinery (Refinery) located at 501 East Main Street in Artesia, New Mexico. The location of the Refinery is shown on Figure 1. The Refinery is subject to (1) a Post-Closure Care Permit (PCC Permit) issued by the New Mexico Environment Department (NMED) in October 2003 (NMED 2003) and later modified in December 2010 (NMED 2010); and (2) the renewed Discharge Permit GW-028 issued by New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division (OCD) on May 25, 2017 (OCD 2017a) and modified on June 29, 2017 (OCD 2017b). The PCC Permit authorizes and requires Navajo (the Permittee) to conduct facility-wide groundwater monitoring, with the purpose of evaluating the presence, nature and extent of hazardous and regulated constituents pursuant to Section 20.4.1.500 of the New Mexico Administrative Code (NMAC) and the Water Quality Control Commission (WQCC) standards included in NMAC 20.6.2. The Discharge Permit also requires facility-wide groundwater monitoring.

This 2019 FWGMWP serves as the annual update to the facility-wide groundwater monitoring program required by Section 4.7.6.a of the modified PCC Permit. The previous annual FWGMWP is the 2018 Facility-Wide Groundwater Monitoring Work Plan which was submitted to NMED and OCD in June 2018 (TRC 2018) and approved with modifications on March 26, 2019 (NMED 2019). This 2019 FWGMWP details all groundwater monitoring activities that will be conducted to satisfy the requirements of both the NMED PCC Permit and the OCD Discharge Permit upon approval by NMED and OCD. This 2019 FWGMWP describes the procedures to be followed during routine groundwater monitoring activities, including well gauging, groundwater sampling, managing investigation-derived waste (IDW), decontamination, laboratory analysis, and quality assurance/quality control (QA/QC). The format of this 2019 FWGMWP follows the general outline specified for an investigation work plan in Appendix E.2 of the PCC Permit, while incorporating the requirements of Section 5 of the Discharge Permit.

The groundwater monitoring program covers the following Refinery areas:

- The closed Tetra Ethyl Lead (TEL) Impoundment, an approximately 0.9-acre land treatment unit located along the northern portion of the Refinery to the south and east of Eagle Creek;
- The closed North Colony Landfarm (NCL), an approximately 4.25-acre land treatment unit located near the northwestern corner of the Refinery;
- The inactive Evaporation Ponds (EP), located approximately three miles east of the active Refinery and immediately south/west of the Pecos River;



- The inactive Three Mile Ditch (TMD), an approximately 3-mile long former open wastewater conveyance ditch located between the northern portion of the active Refinery and the inactive Evaporation Ponds; and
- The vadose zone located beneath the Refinery (including the areas referred to as North Refinery, South Refinery, Field East of Refinery, North Reverse Osmosis [RO] Reject Field, South RO Reject Field, Cross-Gradient of Refinery, and Up-Gradient of Refinery).

The locations of these areas and the monitoring wells, recovery wells, and irrigation wells included in the facility-wide groundwater monitoring program are provided on Figure 2.



### 2.0 SITE BACKGROUND

Navajo owns and operates the Refinery which is located in Artesia, New Mexico and has been in operation since the 1920's. The Refinery can process heavy, sour and light, sweet crude oils and runs a predominant slate of Permian Basin crudes that are gathered in west Texas and southeast New Mexico and can also source a variety of crude oils from Cushing, Oklahoma, including Canadian crudes. The Refinery serves markets in the southwestern United States and northern Mexico. A site location map is provided as Figure 1. A facility-wide site plan is provided as Figure 2 and shows the locations of wells included in the facility-wide groundwater monitoring program.

The Refinery is regulated under the Resource Conservation and Recovery Act (RCRA) with EPA ID Number NMD 048918817. The NMED issued a Hazardous Waste Facility Permit to Navajo effective August 21, 1989 (NMED 1989), part of which included a Hazardous and Solid Waste Amendment (HSWA) Permit issued by the EPA. The HSWA permit required Navajo to identify all historical and current non-hazardous solid waste management units (SWMUs) and investigate those that had the potential to pose a threat to human health or the environment. RCRA Facility Investigations (RFIs) were conducted at the TMD and EP areas in 1990 (Mariah Associates, Inc. 1990) and from 1991 through 1993 (K.W. Brown Environmental Services 1993). Corrective actions were recommended for soil (K.W. Brown Environmental Services 1996) and groundwater (Foster Wheeler 1997) at the TMD and EP based on the RFI results. RFI activities were conducted at the NCL area from 1994 through 1997 (Covenant Technical Associates, Inc. 1997) and RFI results indicated groundwater impacts associated with historical operations were present at the NCL.

At the request of NMED, Navajo submitted a PCC Permit Application in June 1998 and revisions to the application in 2001 (Navajo 2001). The original intent of this application was to address only closure and post-closure activities at the EPs and TMD, but the application was expanded to include a complete RCRA Permit renewal application. The NMED issued a PCC Permit to Navajo effective October 5, 2003 (NMED 2003). The PCC Permit was modified in December 2010 (NMED 2010). The PCC Permit authorizes and requires the Permittee to monitor the groundwater, maintain all groundwater monitoring wells, and comply with applicable regulations of NMAC 20.4.1.500 during the post-closure period. Specific groundwater monitoring requirements are included in the PCC Permit for the areas of the TMD, NCL, EP, and other areas identified through implementation of the investigations of various SWMUs.

Historically, the Refinery has applied reject fluids from the RO system to the Refinery North and South RO Reject Fields under Discharge Permit GW-028. The OCD originally issued the Discharge Permit to Navajo on October 21, 1991, and most recently issued a renewal on May 25, 2017 (OCD 2017a) and modified on June 29, 2017 (OCD



2017b). The Discharge Permit requires the Permittee to conduct facility-wide groundwater monitoring. In 2018, a Class I injection well (WDW-4), was installed as an alternative disposal method for the RO reject fluids and the well became operational in January 2019. Land application of RO reject water to the North and South RO Reject Fields ceased on January 26, 2019. Navajo submitted a *Stage 1 Abatement Plan for the Reverse Osmosis Reject Discharge Fields* (Stage 1 Abatement Plan) on March 21, 2019, and an amendment of the Stage 1 Abatement Plan on May 24, 2019. The amended Stage 1 Abatement Plan was approved on June 7, 2019.

In 2006, Navajo submitted a Groundwater Monitoring Work Plan that combined the requirements of the two permits into a comprehensive facility-wide groundwater monitoring program (Navajo 2006). This 2019 FWGMWP comprises the annual update of the work plan, as required by Section 4.7.6.a of the PCC Permit.



### 3.0 SITE CONDITIONS

This section describes the current surface and subsurface conditions at the Refinery.

### 3.1 Surface Conditions

### 3.1.1 Topography

The Refinery is located on the east side of the City of Artesia (city) in the broad Pecos River Valley of Eastern New Mexico. The topography at and surrounding the Refinery is shown on Figure 1. The average elevation of the city is 3,380 feet above mean sea level. The plain on which the city is located slopes eastward at about 30 feet per mile.

### 3.1.2 Surface Water Drainage

Surface drainage in the region is dominated by minor ephemeral creeks and arroyos that flow eastward to the Pecos River, located approximately three miles east of the city. The major drainage feature in the immediate area of the Refinery is Eagle Creek (or Eagle Draw), which runs southwest to northeast through the northern process area of the Refinery and then eastward to the Pecos River. Eagle Creek is an ephemeral watercourse that primarily flows only following rain events. Upstream of the Refinery, Eagle Creek functions as a major stormwater conveyance for the city. Eagle Creek also drains outlying areas west of the city and is periodically scoured by intense rain events.

Natural surface drainage at the Refinery is to the north and east. Stormwater within the process areas is captured and routed to the Refinery wastewater treatment system. Stormwater from non-process areas is contained within the Refinery property inside stormwater berms and routed to stormwater retention basins. Stormwater from within the Refinery boundary is not allowed to discharge to Eagle Creek.

The elevation of Eagle Creek is 3,360 feet at its entrance to the Refinery and decreases to approximately 3,305 feet at its confluence with the Pecos River. Eagle Creek was channelized from west of the City of Artesia to the Pecos River to help control and minimize flood events. In the vicinity of the Refinery, the Eagle Creek channel was cemented to provide further protection during flood events. A check dam was also constructed west of the City of Artesia along Eagle Creek. Federal floodplain maps indicate that most of the city and the Refinery have been effectively removed from the 100-year floodplain.

### 3.1.3 Area Land Uses

The areas north, south, and east of the Refinery is sparsely populated and used primarily for agricultural purposes. The primary business and residential areas of the City of Artesia are located to the west, southwest, and northwest of the Refinery. There are commercial/industrial businesses present south of the Refinery along Highway 82,



including an oil-field pipe company located at the southeast corner of the Refinery. Navajo owns a majority of the land bounded by Hermosa Drive to the south, East Richey Avenue to the north, Highway 285 (or Freeman Avenue on the south side of Highway 82) to the west, and Bolton Road to the east. A majority of the land located east of the Refinery between Bolton Road and Haldeman Road is cultivated as pecan orchards or used for other agricultural purposes.

The active Refinery and much of the surrounding property owned by Navajo is fenced and guarded with controlled entry points.

### 3.2 Subsurface Conditions

### 3.2.1 Surficial Soils

Surficial soil at the Refinery is predominantly comprised of approximately 60% Pima series and 40% Karro series. The Pima and Karro series both consist of deep, well drained soils that formed in alluvial settings. They are both calcareous and have slow to medium runoff.

### 3.2.2 Geology

Artesia is located on the northwest shelf of the Permian Basin. In this region, the deposits comprise of approximately 250 to 300 feet of Quaternary alluvium uncomformably overlying approximately 2,000 feet of Permian clastic and carbonate rocks. These Permian deposits uncomformably overlie Precambrian syenite, gneiss, and diabase crystalline rocks.

### 3.2.2.1 Quaternary Alluvium

The Quaternary alluvium in the Refinery area is dominantly comprised of clays, silts, sands and gravels deposited in the Pecos River Valley. These "valley fill" deposits extend in a north-south belt approximately 20 miles wide, generally west of the Pecos River. The thickness of the valley fill varies from a thin veneer on the western margins of the Pecos River valley to a maximum of 300 feet in depressions, one of which is located beneath the Refinery. These depressions have resulted from dissolution of the underlying Permian carbonates and evaporites.

### 3.2.2.2 Permian Artesian Group

The Permian Artesian Group is comprised of the following five formations from shallowest to deepest: the Tansill, Yates, Seven Rivers, Queen and Grayburg Formations. The Tansill and Yates Formations outcrop at the surface east of the Pecos River and are not present in the vicinity of the Refinery. The Seven Rivers Formation is present at an approximate depth of 300 feet in the area between the Pecos River and the Refinery. However, the Seven Rivers Formation thins and pinches to the west and it is not evident



based on boring logs that this formation has been encountered beneath the Refinery process areas.

In the area of the Refinery, the Queen and Grayburg Formations have been mapped as a single unit consisting of approximately 700 feet of interbedded dolomite and calcareous dolomite, gypsum, fine-grained sandstone, carbonates, siltstone and mudstone. In locations where the Seven Rivers Formation is absent, the upper portion of the Queen Formation acts as a confining bed between the deep artesian aquifer and the valley fill aquifer.

### 3.2.2.3 San Andres Formation

The San Andres Formation lies beneath the Grayburg and Queen Formations and immediately above the Precambrian crystalline basement rocks. The San Andres Formation is greater than 700 feet thick and composed mainly of limestone and dolomite with irregular and erratic solution cavities ranging up to several feet in diameter. The upper portion of the formation is composed of oolitic dolomite with some anhydrite cement.

### 3.3 Hydrogeology

The principal aquifers in the Artesia area are within the San Andres Formation and the valley fill alluvium. There are two distinct water-bearing zones within the valley fill alluvium in the vicinity of the Refinery and are referred to as the "shallow saturated zone" and the "valley fill zone". The deeper carbonate aquifer within the San Andres Formation is referred to as the "deep artesian aquifer".

### 3.3.1 Shallow Saturated Zone

The shallow saturated zone occurs in fractured caliche and interbedded sand and gravel channels at 10 to 30 feet below ground surface (bgs). Groundwater in this zone is under confined conditions for some or most of the year, with static water levels measured in groundwater monitoring wells 3 to 5 feet above the shallow saturated zone. The general direction of flow in this shallow saturated zone is to the east toward the Pecos River. Groundwater flow direction and gradient in the shallow saturated zone have remained generally consistent over time, as documented in previous annual groundwater monitoring reports.

Major sources of water in the shallow saturated zone are likely to be recharge from Eagle Creek and lawn watering runoff from the grass-covered urban park that occupies the Eagle Creek Channel immediately upstream of the Refinery. The water in the shallow saturated zone is highly variable in quality, volume, areal extent, and saturated thickness. Concentrations of total dissolved solids (TDS) exceeding 4,000 milligrams per liter (mg/L) and sulfate exceeding 2,000 mg/L have been recorded west and northwest (up-gradient) of the Refinery.



The shallow saturated zone contains phase-separated hydrocarbon (PSH) and dissolved-phase hydrocarbon constituents, as reported in the 2018 Annual Groundwater Monitoring Report (TRC 2019). Concentrations of dissolved-phase hydrocarbon constituents in the shallow saturated zone have generally exhibited a stable or decreasing trend over time.

### 3.3.2 Valley Fill Zone

The valley fill zone underlies the shallow saturated zone and occurs in Quaternary alluvial deposits of sand, silt, clay and gravel. These sediments are about 300 feet thick near the Refinery.

Irrigation and water production wells completed in the valley fill zone are typically screened across one to five water-producing intervals ranging in thickness of 20 to 170 feet, with a majority of the thicknesses being closer to 20 feet. Production intervals are non-continuous, consist principally of sand and gravel, and are separated by less permeable lenses of silt and clay of varying thickness. Based on logs of wells located immediately to the north and east of the Refinery, the thicknesses of silt and clay deposits range from 20 to 160 feet and are interspersed with thin zones of gravels in the upper 100 feet. Wells in the valley fill zone range from 40 to 60 feet bgs and the formation yields water containing TDS ranging from 500 to 1,500 mg/L.

The valley fill zone contains dissolved-phase hydrocarbon constituents, as reported in the 2018 Annual Groundwater Monitoring Report (TRC 2019). Concentrations of dissolved-phase hydrocarbon constituents in the valley fill zone have generally exhibited a stable or decreasing trend over time.

The valley fill zone and the underlying San Andres aquifer are hydraulically connected in some areas.

### 3.3.3 Deep Artesian Aquifer

The deep artesian aquifer is closely related to the Permian San Andres Limestone and generally consists of one or more water-producing intervals of variable permeability located in the upper portion of the formation. However, in the Artesia area, the water-producing interval rises stratigraphically and includes the lower sections of the overlying Grayburg and Queen formations. Near the Refinery, the depth to the top of the water-producing interval is estimated to be about 440 feet bgs. The Seven Rivers formation and the other members of the Artesia Group are generally considered confining beds although some pumpage occurs locally from fractures and secondary porosity in the lower Grayburg and Queen members.

The deep artesian aquifer has been extensively developed for industrial, municipal, and agricultural use. TDS in this aquifer ranges from 500 mg/L to more than 5,000 mg/L



depending on location. In the Artesia area, water from this aquifer is generally produced from depths ranging from 850 feet to 1,250 feet below ground surface. The aquifer recharges in the Sacramento Mountains to the west of Artesia. Extensive use of this aquifer in recent decades has lowered the potentiometric head in the aquifer in some locations from 50 to 80 feet bgs, although extensive rainfall in some years may bring the water levels in some wells close to ground surface.

Available well completion records for irrigation well RA-4798 indicate that it is screened in the deep artesian aquifer from 840 to 850 feet bgs. Historic analytical data from this well does not indicate the presence of hydrocarbon impacts from Refinery operations.



### 4.0 MODIFICATIONS TO THE GROUNDWATER MONITORING NETWORK

No modifications to the groundwater monitoring network have occurred since submittal of the 2018 FWGMWP. Repairs and/or modifications made to the existing wells are described below.

### 4.1 New Monitoring Wells

No new monitoring wells have been installed since submittal of the 2018 FWGMWP.

### 4.2 Well Abandonment

No monitoring wells have been abandoned since submittal of the 2018 FWGMWP.

### 4.3 Well Repairs and Modifications

The following well maintenance and repairs were performed on existing wells since submittal of the 2018 FWGMWP:

- Locking well J-plugs and locks were replaced on various monitoring wells as required.
- PSH absorbent socks were installed and maintained in wells MW-64, MW-85, MW-MW-86, KWB-4, KWB-8, and TEL-3.



### 5.0 MONITORING PROGRAM SCOPE OF SERVICES

The proposed groundwater monitoring program will consist of semi-annual gauging of select wells; semi-annual, annual, or biennial groundwater sampling of select wells; and annual reporting. No substantial changes to the previous facility-wide monitoring program have been proposed in this 2019 FWGMWP.

### 5.1 Scheduling and Notification

The schedule of the semi-annual groundwater monitoring events is dependent on the flood irrigation season of the pecan orchard located east of the Refinery, which is typically conducted between April and October. The first semi-annual event will be conducted before the start of the flood irrigation (in March or April of each calendar year) and the second semi-annual event will be conducted after completion of the flood irrigation season (in October or November of each calendar year). Wells that will be sampled on an annual or biennial basis will be sampled during the first semi-annual monitoring event (i.e., the annual event). Biennial events will be completed during the first semi-annual event of odd-numbered calendar years. The NMED and OCD will be notified of the monitoring schedule prior to each monitoring event. The sampling frequency for each well is provided on Table 1 and Figure 3.

### 5.2 Gauging Requirements

Synoptic fluid level gauging will be completed semi-annually at all active and accessible monitoring and recovery wells. Wells will be gauged for depth to PSH, if present, depth to water, and total depth. Dedicated tubing and pumps (if present) will remain in the wells during gauging to minimize disturbance to the water column, if possible. All synoptic well gauging will be completed in as short a time-period as possible, typically within 48 hours. Each monitoring well will also be gauged immediately prior to commencing purging/sampling activities.

### 5.3 Sampling Requirements

Sampling frequency and target analytes for each well were selected based on historical data, dissolved-phase concentration trends, and well location relative to the Refinery and area boundaries. Select groundwater samples will be analyzed for volatile organic compounds (VOCs), diesel range organics (DRO), gasoline range organics (GRO), total metals, dissolved metals (first semi-annual event only), cations, anions, nitrates/nitrites, cyanide, and/or TDS. Wells that contain PSH at measured thicknesses of 0.03 feet or greater will not be sampled during any event. The required sample analytical parameters and sampling frequency for each well are summarized in Table 1.



### 6.0 GROUNDWATER MONITORING PROCEDURES

Monitoring activities will consist of the following tasks: field documentation, well inspection, well gauging, groundwater purging and sampling, handling of samples for laboratory analysis, QA/QC sampling, and managing IDW. The procedures that will be used to complete each task are described in detail below.

### 6.1 Field Documentation

Documentation of field activities associated with groundwater monitoring events will be recorded each day in a bound field logbook and associated field sampling forms. Each page of the logbook and field sampling forms will be signed by the person(s) making entries on that page. The following information will be collected during groundwater sampling activities:

- Sampling and oversight personnel identification
- Instrument calibrations
- Well conditions
- Monitoring well measurements including static water level depth, total well depth, and water column height
- Depth to PSH, if present
- Weather conditions at the time of sample collection and throughout the sampling event
- Well purging procedures including: equipment, purge volume, rate, and elapsed time
- Water quality parameters recorded during purging including appearance, odor, pH, temperature, conductivity, TDS, oxidation-reduction potential (ORP), dissolved oxygen (DO), and turbidity
- Sample collection dates and times
- Reasons for deviating from the sampling and analysis plan (if applicable)

### 6.2 Well Inspection

During each gauging and sampling event, all monitoring and recovery wells will be inspected for well integrity. The information will be recorded on the groundwater gauging form. Each inspection will include:

• Identification of the well



- Inspection of the well pad for deterioration or damage
- Inspection of the protective casing and well casing for deterioration or damage
- Inspection of the presence or absence and condition of the padlock and well Jplug
- Measurement of the total depth of the well

### 6.3 Well Gauging

The depth to PSH, if present, and groundwater will be gauged at each monitoring well prior to sampling. The wells that are to be gauged are presented in Table 1 and well locations are depicted on Figure 2. Prior to gauging, each well cap will be removed to allow groundwater to equilibrate with atmospheric pressure. Fluid level measurements will be collected using an oil/water interface probe to an accuracy of 0.01 feet. Measurements will be made from a marked survey datum at the top of casing (TOC). Data will be recorded on a paper field gauging form. The oil/water interface probe will be decontaminated before use and between wells following the procedures outlined in Section 6.8.

### 6.3.1 Fluid Level Gauging Procedures

The following procedure will be used to measure the depths to PSH and groundwater:

- The probe will be lowered into the well slowly until the probe alarm sounds or light illuminates, then the tape will be raised and lowered again slowly until the alarm is again audible or the light again illuminates. The depth to fluid on the tape will be recorded to within 0.01 feet. To ensure accuracy, the measurement will be repeated.
- Well identification, date, time, depth to water, depth to PSH (if applicable), and other pertinent observations will be recorded on the field gauging form.

### 6.3.2 Total Depth Gauging

Total well depth will be measured to detect the amount of silt accumulation in a well. This measurement will be collected during sampling events and well inspections. The following procedures will be followed to determine the total depth of the well:

- The oil/water interface probe will be slowly lowered until the bottom of the well is detected.
- The total well depth will be measured when the tape becomes slack for hard bottoms.



- The point of "pick-up" (where the weight of the probe is felt when reeling up the probe) will be used to determine the total depth in the case of soft sediment bottoms.
- The hardness of the bottom of the well will be documented in the field logbook.

### 6.4 Groundwater Sampling

Groundwater will be purged and sampled from monitoring and recovery wells using low-flow methods in accordance with the NMED Hazardous Waste Bureau (HWB) Position Paper "Use of Low-Flow and Other Non-Traditional Sampling Techniques for Compliance Groundwater Monitoring" (NMED 2001). Groundwater will be purged and sampled from irrigation wells using standard procedures described below. Data collected during the purging and sampling of each well will be recorded on a paper groundwater sampling form.

Groundwater will be purged and sampled from monitoring and recovery wells using either a peristaltic pump (for sampling depths of approximately 25 feet bgs or less) or a dedicated, stainless steel submersible pump (for sampling depth greater than 25 feet bgs). The locations of monitoring and recovery wells to be purged and sampled are provided on Figure 3. An oil/water interface probe will be lowered into the monitoring well to record the depth to water.

Groundwater will be purged and sampled from irrigation wells by attaching a decontaminated or dedicated hose barb to the available spigot. The spigot will be located at a point before the water supply is introduced into any storage tanks or treatment units. The groundwater will be purged from the spigot so that any stagnant water from the well casing and surface piping is removed.

A multi-parameter water quality meter with flow-through cell and hand-held turbidity meter will be used during the purging process to monitor for field water quality parameters (pH, temperature, conductivity, TDS, ORP, DO, and turbidity) and demonstrate stabilization. Water quality parameters will be recorded approximately every three minutes during purging. Water quality meters used to measure field parameters will be calibrated each day according to the manufacturer's specifications. The make, model, calibration fluids, and calibration results for the water quality meters will be recorded in the field logbook. The turbidity meter test cell will be triple rinsed with groundwater from the next sample aliquot prior to each reading. The water quality parameters and depth to water (in non-irrigation wells only) will be recorded on the Groundwater Sampling Form. A description of the water quality (e.g., turbidity, sheen, odor) will be recorded during the purging process.



The purging process will be considered complete and groundwater sampling will commence when at least four of the seven water quality parameters achieve stabilization within ten percent for three consecutive readings.

If the well goes dry during purging, a sample will be collected as soon after the water level recovers to a level from which a sample can be collected. The samples will be collected in clean, labeled laboratory-supplied containers prepared with the appropriate amount and type of preservative. The groundwater samples will be submitted for laboratory analysis following the schedule in Table 1.

Samples submitted for dissolved metals analysis will be filtered in the field using a new 0.45-micron filter. Filtering methods will be documented on the groundwater sampling form, field logbook, and chain-of-custody.

### 6.5 Handling of Samples for Laboratory Analysis

Neoprene or nitrile gloves will be worn during sample collection and while handling sample containers. New disposable gloves will be used to collect each sample. The sample containers will be labeled, secured with bubble wrap, placed in a resealable plastic bag, and immediately placed on ice in a cooler and stored below 4° C. The sample labels will include the Permittee name (Navajo), site name (Artesia Refinery), unique sample identification, sample collection time and date, preservatives, and the name(s) of the sampler(s). The samples will be secured with packing material and kept below 4° C with wet ice in accordance with laboratory cooler shipping guidelines. The cooler will be secured with packing tape, and a signed and dated custody seal will be placed over the cooler lid and secured with tape. The samples and a completed chain-of-custody documentation will be shipped via priority overnight delivery to the analytical laboratory. The chain-of-custody forms are to be maintained as a record of sample collection, transfer, shipment, and receipt by the laboratory. At a minimum, all samples will be submitted to the laboratory within 48 hours after collection. The laboratory will be informed that samples are being submitted for analysis and it will be confirmed that the samples were received the following day. If samples are shipped on Friday for Saturday delivery, the receiving laboratory will be contacted so provisions can be made for laboratory sample receipt.

### 6.6 Quality Assurance/Quality Control Sampling

Field QA/QC samples for groundwater will be collected as follows:

• Duplicates: Collected at a frequency of ten percent at the same time and from the same location as the original sample.



- Equipment blanks: Collected from non-dedicated, decontaminated equipment at a frequency of five percent by pouring distilled water over the equipment and collecting the sample in the appropriate laboratory containers.
- Trip blanks: One included in each cooler shipped to the laboratory that contains samples for VOC analyses. The trip blank consists of two 40-milliliter (mL) vials of reagent water provided by the laboratory that were stored in the sample cooler at all times.

Laboratory QA/QC samples will be performed according to test methodologies specified for each analytical method. The laboratory QA/QC samples may include reagent or method blanks, surrogates, matrix spike/matrix spike duplicates, blank spike/blank spike duplicates and/or laboratory duplicates, as appropriate for each method. The laboratory QA/QC samples will be run at the frequency specified by each method.

### 6.7 PSH Sample Collection

In the event that PSH is present in any of the monitoring or recovery wells that have not historically contained PSH, samples may be collected when sufficient volume (80 mL) is present for collection and analysis. The desired analyses for evaluation of PSH include paraffins, isoparaffins, aromatics, naphthenes, and olefins (PIANO) as well as specific gravity and simulated distillation. Navajo will notify the NMED within seven calendar days if PSH is present in wells where PSH has not previously be encountered, as required by the PCC Permit.

PSH samples will be collected using a disposable, non-dedicated hand bailer. The bailer will be lowered into the well slightly into the PSH and water column. The bailer will be slowly removed and groundwater decanted from the bottom of the bailer. The PSH remaining in the bailer will then be placed into the sample container, and the container will be sealed and properly labeled for shipment. Excess groundwater and PSH will be managed per methods discussed in Section 6.9.

### 6.8 Decontamination

The interface probe and other non-dedicated equipment coming into contact with groundwater will be decontaminated by the following procedures:

- 1. PSH, if present, will be removed with an absorbent pad.
- 2. Any solids will be removed to the degree possible with a brush and tap or distilled water.
- 3. Equipment will be washed with a brush, laboratory-grade non-phosphate detergent (e.g., Liquinox, Alconox), and potable tap water. Excess soap will be allowed to drain off the equipment when finished.



4. Equipment will be double rinsed with distilled water.

All decontamination fluids will be managed per methods discussed in Section 6.9.

### 6.9 Investigation-Derived Waste Disposal

The IDW (e.g., purge water, decontamination water) generated during monitoring activities will be collected and disposed of in the Refinery wastewater treatment system, upstream of the oil/water separator. Miscellaneous IDW (e.g., gloves, bailers) in contact with investigative material deemed to have no or de minimis contamination will be disposed of in a general refuse container. Any IDW deemed to have greater than de minimis contamination will be stored in labeled drums and disposed appropriately on a per case basis.



### 7.0 ANNUAL GROUNDWATER MONITORING REPORT

Groundwater monitoring from each calendar year will be documented in an *Annual Groundwater Monitoring Report*, in accordance with both the PCC Permit and the Discharge Permit. The *Annual Groundwater Monitoring Report* will follow the general report format provided in Appendix E of the PCC Permit and incorporate the requirements of Section 2.E of the Discharge Permit. At a minimum, the *Annual Groundwater Monitoring Report* will include the following:

- Description of groundwater monitoring and remediation activities conducted throughout the reporting period, including sample collection procedures, decontamination procedures, sample handling procedures, and management of wastes;
- Summary table of semi-annual groundwater and PSH gauging data, with corrected water table elevation for all wells containing PSH;
- Summary table of groundwater quality parameters recorded in the field (purge parameters);
- Summary of laboratory analytical data with comparison to screening levels;
- Summary of QA/QC data review and validation;
- Groundwater contour maps depicting the groundwater gradient for each semiannual monitoring event of the reporting period, including site features and the direction and magnitude of the hydraulic gradient;
- PSH thickness isopleths maps for each semi-annual monitoring event during the reporting period;
- Isoconcentration maps for major constituents of concern (COCs);
- Plots of static water elevation versus time in key wells, specifically those that contain PSH;
- Plots of target COC groundwater concentrations versus time in wells that have historically exceeded screening levels;
- Tabulation of the monthly and cumulative volume of PSH removed from recovery wells or monitoring wells throughout the reporting period; and
- Recommendations, including any recommended changes to the groundwater monitoring program.



The *Annual Groundwater Monitoring Report* will be submitted to NMED by February 28 of the calendar year following sample collection and to OCD by June 15 of the calendar year following sample collection as part of the GW-028 Annual Discharge Report.



### 8.0 SCHEDULE

The groundwater monitoring program is conducted on a semi-annual basis. The first semi-annual event will occur no more than 30 days prior to the start of the pecan orchard flood irrigation season but no later than April 30 of each year. Typically, the first semi-annual event will occur in March or April of each calendar year.

The second semi-annual event will occur no later than 30 days after the conclusion of the pecan orchard flood irrigation season or November 15 each year. Typically, the second semi-annual event will occur in October or November of each calendar year.

The wells that are sampled on an annual basis will be sampled during the first semiannual event of each calendar year.

The wells that are sampled biennially will be sampled every other year. Biennial sampling at the Refinery began in the first semi-annual event of 2011. As such, these wells will be sampled during the first semi-annual event of each odd numbered year.

Navajo will notify both NMED and OCD prior to the initiation of each semi-annual sampling event.

The *Annual Groundwater Monitoring Report* will be submitted to NMED no later than February 28 of the calendar year following sample collection and to OCD no later than June 15 of the calendar year following sample collection as part of the *GW-028 Annual Discharge Report*.



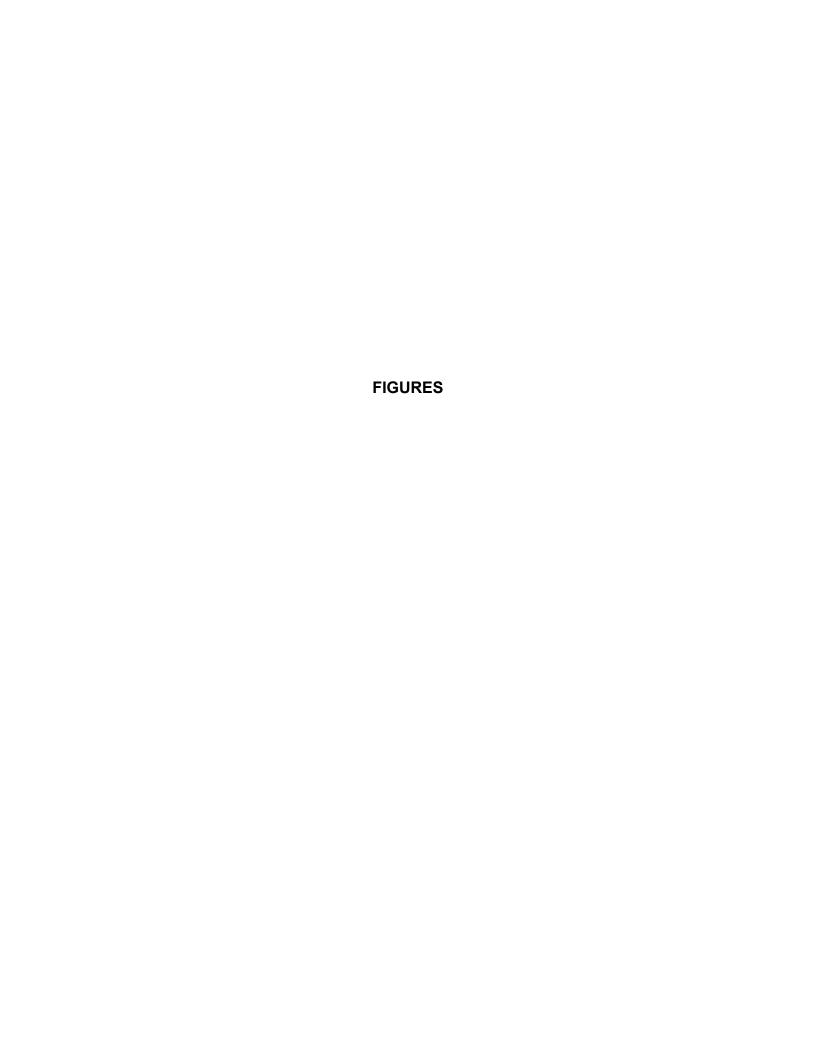
### 9.0 REFERENCES

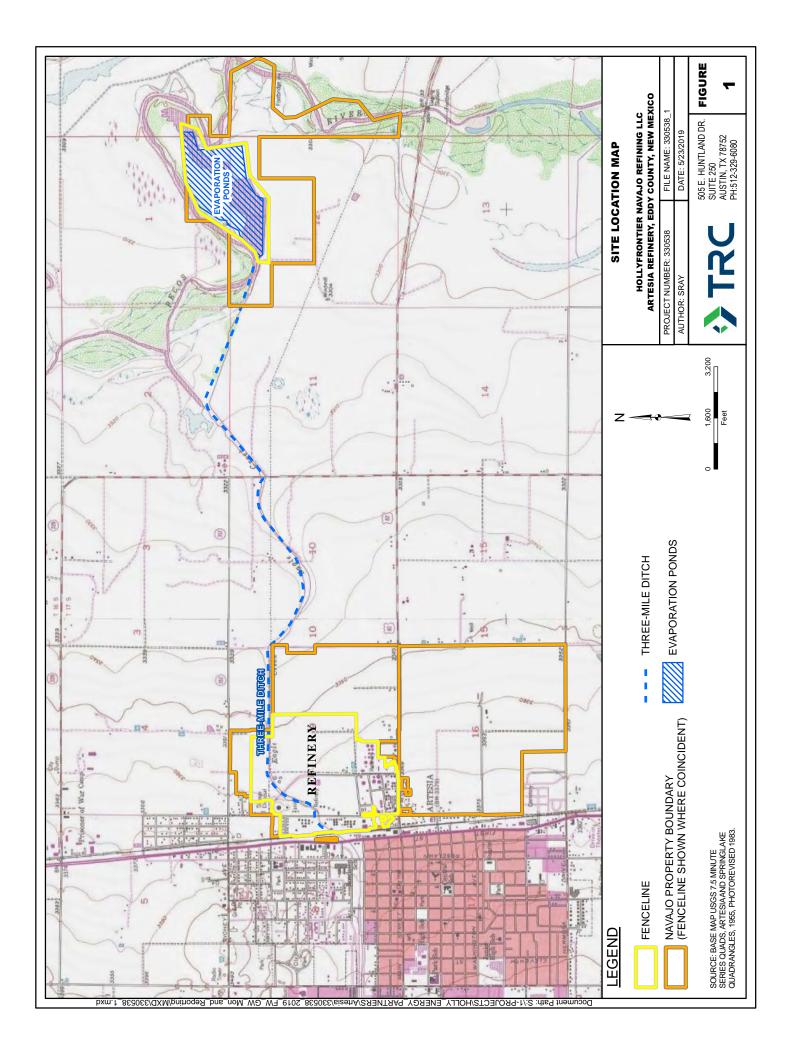
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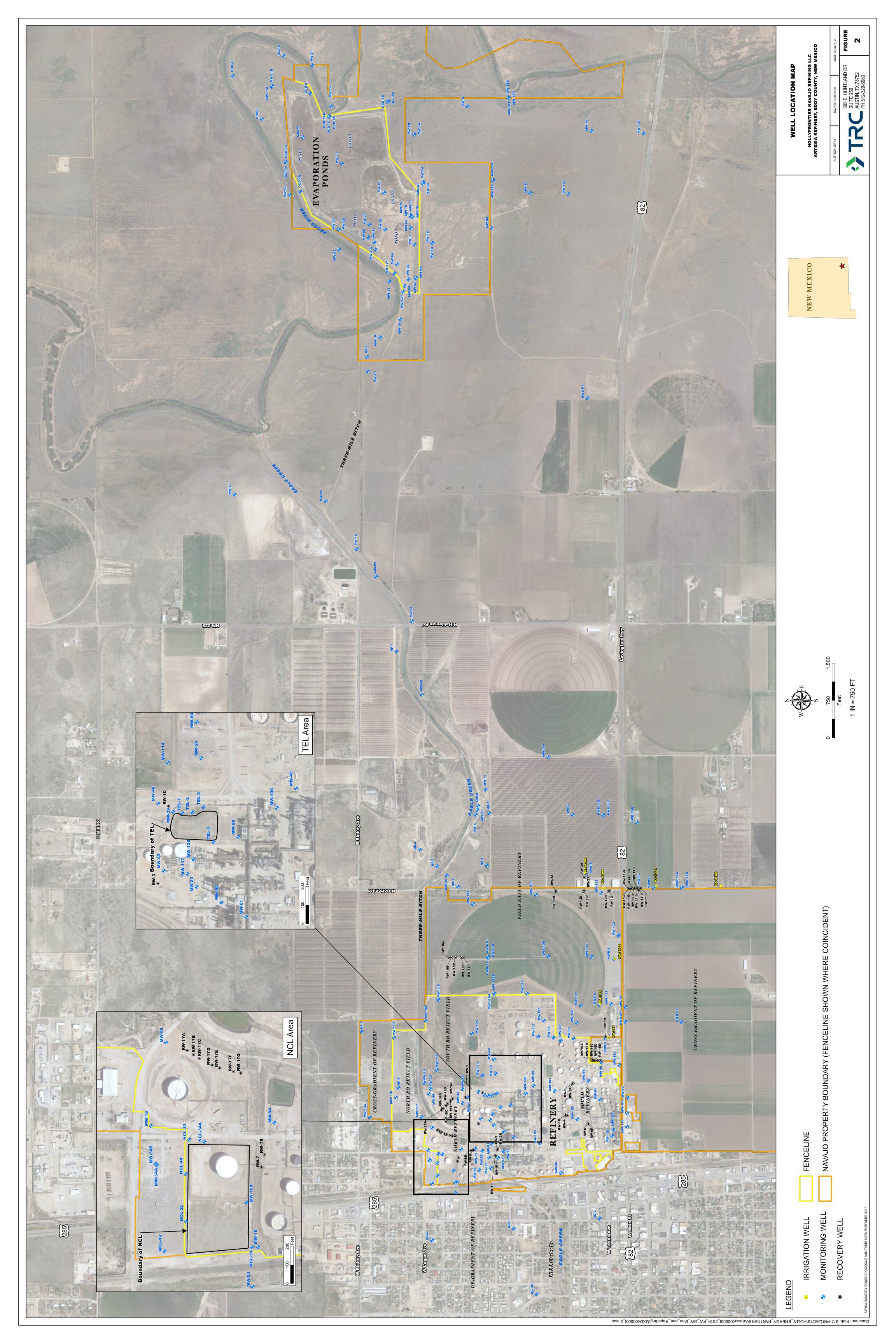


TRC 2019. 2018 Annual Groundwater Monitoring Report. February 28, 2019.









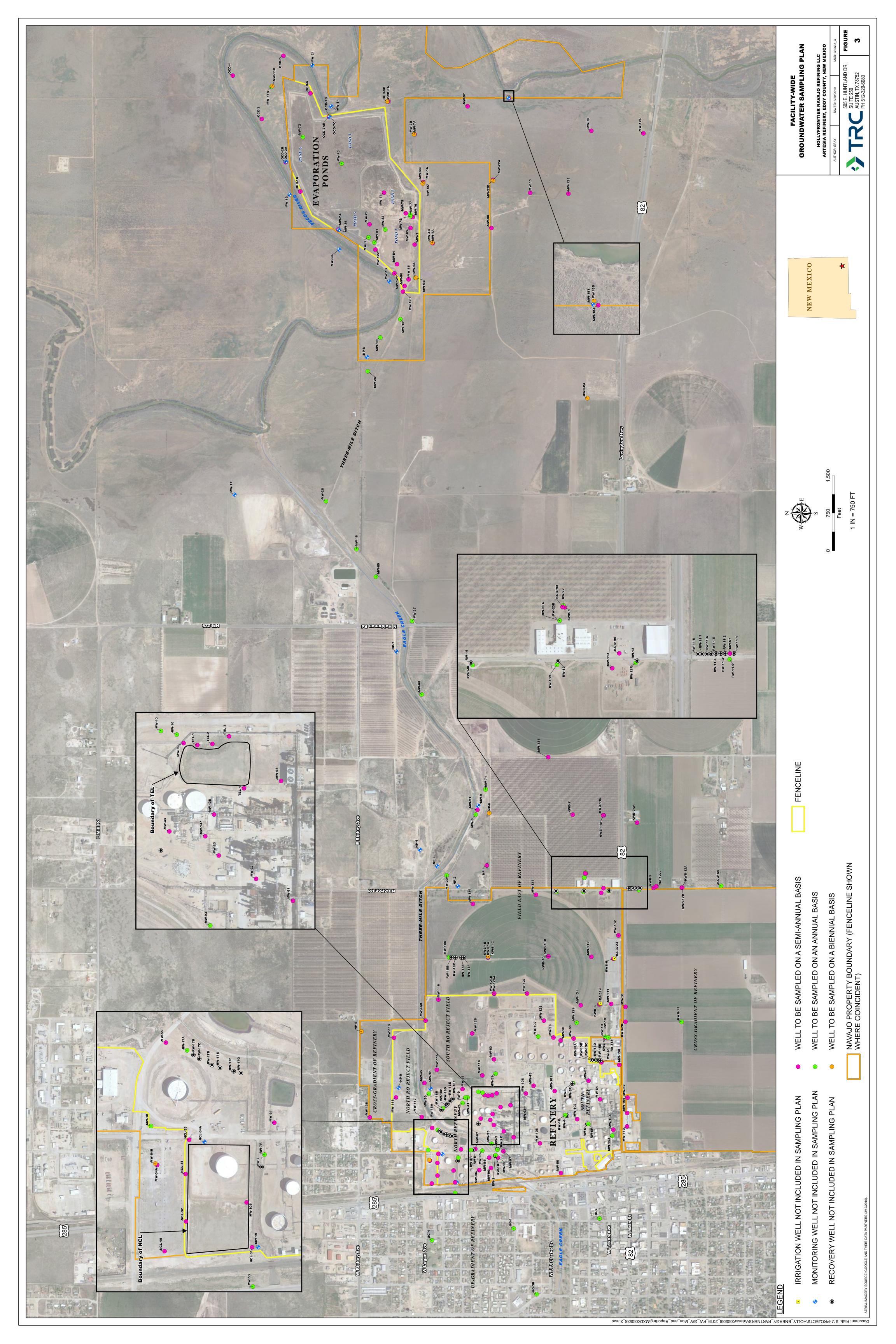




Table 1. 2019 Facility-Wide Groundwater Monitoring Program and Schedule HollyFrontier Navajo Refining LLC - Artesia Refinery, Artesia, New Mexico

			Well Construction <sup>a</sup>				>		Analytical Suite and Frequency c								
					,,,,		enci			7	.y a.ou		tals	loquo			
Well ID	Well Type	Associated Area	, ,	Screen Interval (ft bgs)	Water Bearing Zone	Historic PSH? <sup>b</sup>		Purge Parameters	DRO	GRO	VOCs	As, Ba, Cr, Fe, Pb, Mn, Se	B, Cd, Co, Hg, Ni, U, Va	Cyanide	Cations/Anions	Nitrate / Nitrite as Nitrogen	Total Dissolved Solids
KWB-13	Monitoring	Cross-gradient	2		Shallow		SA	Α	Α	-	Α	Α	Α	Α	Α	Α	A
MW-136	Monitoring	Cross-gradient	2	10 to 25	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
NP-5	Monitoring	Cross-gradient	2	10.25 to 20	Shallow		SA	В	В	-	В	В	-	-	В	В	В
MW-1R	Monitoring	EP	2	8 to 23	Shallow		SA	A	A	-	A	A	-	-	A	A	A
MW-2A MW-2B	Monitoring	EP EP	2	38.5 to 48	Shallow		SA SA	SA	SA	SA	SA	SA	to be c	- Iloct	SA	SA	SA
MW-3	Monitoring	EP EP	2	38.5 (0 48	Valley Fill Shallow		SA	SA	SA	SA	SA	SA	lo be c	onecu	SA	SA	SA
MW-4A	Monitoring	EP EP	2 4		Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-4B	Monitoring Monitoring	EP	4	60.25 to 70	Valley Fill		SA	В	В	В	В	В	-	_	В	В	В
MW-5A	Monitoring	EP	2	00.23 to 70	Shallow		SA	SA	SA	SA	SA	SA	_	_	SA	SA	SA
MW-5B	Monitoring	EP	2	41.5 to 50.5	Valley Fill		SA	В	В	В	В	В	_	_	В	В	В
MW-5C	Monitoring	EP	2	59.25 to 68.75			SA	В	В	В	В	В	_	_	В	В	В
MW-6A	Monitoring	EP	2	00.20 10 00.110	Shallow		SA	Α	A	A	Α	A	_	-	A	A	A
MW-6B	Monitoring	EP	2	39.5 to 49	Valley Fill		SA	В	В	В	В	В	-	-	В	В	В
MW-7A	Monitoring	EP	2		Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-7B	Monitoring	EP	4	39.5 to 49	Valley Fill		SA	В	В	В	В	В	-	-	В	В	В
MW-10	Monitoring	EP	2		Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-11A	Monitoring	EP	4	5.5 to 20	Shallow		SA	Α	Α	Α	Α	Α	-		SA	SA	SA
MW-11B	Monitoring	EP	2	35.5 to 45	Valley Fill		SA	В	В	В	В	В	-	-	В	В	В
MW-12	Monitoring	EP	4	6.5 to 16	Shallow		SA				No sa	amples	to be c	ollect	ed		
MW-13	Monitoring	EP	4	9.5 to 19	Shallow		SA					•	to be c				
MW-14	Monitoring	EP	4	5.5 to 20	Shallow		SA		ı	ı	No sa	mples	to be c	ollect	ed	ı	
MW-15	Monitoring	EP	4	9 to 19	Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
MW-18A	Monitoring	EP	4	10 to 20	Shallow		SA	SA	SA	-	SA	SA	SA	SA	SA	SA	SA
MW-18B	Monitoring	EP	2	37 to 47	Valley Fill		SA	В	В	В	В	В	-	-	В	В	В
MW-18T	Monitoring	EP	4	37 to 47	Valley Fill		SA						to be c	ollect			
MW-22A	Monitoring	EP	4	5.5 to 20.5	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-22B	Monitoring	EP	2	42.3 to 52	Valley Fill		SA	В	В	В	В	В	-	- 114	В	В	В
MW-24	Monitoring	EP	6	15 to 20	Shallow		SA					•	to be o				
MW-69 MW-70	Monitoring	EP EP	2 4	5 to 20 5 to 20	Shallow Shallow		SA SA	SA	SA	SA	SA	SA	to be c	onecu	ea A	Ι Λ	
MW-72	Monitoring Monitoring	EP	4	2 to 12	Shallow		SA	A	A	A	A	A	_	_	A	A	A
MW-73	Monitoring	EP	4	2 to 12	Shallow		SA	Α	Α	Α	A	A	_	-	Α	A	A
MW-74	Monitoring	EP	4	2 to 17	Shallow		SA	SA	SA	SA	SA	SA	_	_	SA	SA	SA
MW-75	Monitoring	EP	4	3 to 18	Shallow		SA	SA	SA	SA	SA	SA	_	-	SA	SA	SA
MW-76	Monitoring	EP	4	3 to 18	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-77	Monitoring	EP	4	3 to 18	Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
MW-78	Monitoring	EP	4	2 to 17	Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
MW-79	Monitoring	EP	4	2 to 17	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-80	Monitoring	EP	4	2 to 17	Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
MW-81	Monitoring	EP	4	2 to 17	Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
MW-82	Monitoring	EP	4	2 to 17	Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
MW-83	Monitoring	EP	4	2 to 17	Shallow		SA	SA	SA	SA	SA	SA	-		SA	SA	SA
MW-84	Monitoring	EP	4	2 to 17	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-85	Monitoring	EP	4	3 to 18	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-86	Monitoring	EP	4	2 to 17	Shallow	Υ	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
MW-87	Monitoring	EP	4	2 to 17	Shallow		SA	SA	SA	SA	SA	SA	-	-	Α	A	A
MW-88	Monitoring	EP	4	3 to 18	Shallow		SA	SA	SA	SA	SA	SA	-	-	A	A	A
MW-120	Monitoring	EP EP	2	10 to 25	Shallow		SA	SA	SA SA	SA	SA	SA	-	-	SA SA	SA SA	SA SA
MW-121 MW-122	Monitoring Monitoring	EP EP	2	10 to 25 10 to 20	Shallow Shallow		SA SA	SA SA	SA	SA SA	SA SA	SA SA	-	-	SA	SA	SA
MW-123	Monitoring	EP EP	2	10 to 20	Shallow		SA	SA	SA	SA	SA	SA	-	<del>-</del>	SA	SA	SA
	Monitoring	EP	2	5 to 20	Shallow		SA	SA	SA	SA	SA	SA	-	<del>-</del>	SA	SA	SA
	Monitoring	EP	2	3.3.20	Shallow		SA	SA			SA		_	_	SA	SA	SA
OCD-2A	Monitoring	EP	2	8.5 to 23.5	Shallow		SA	SA	SA	SA	SA	SA	_	<del> </del>	Α	A	A
OCD-2B	Monitoring	EP	2	38.5 to 48	Valley Fill		SA		<u> </u>				to be c	ollect		<u> </u>	-
OCD-3	Monitoring	EP	2	6.5 to 21.5	Shallow		SA	SA	SA	SA	SA	SA	-	-	Α	Α	Α
OCD-4	Monitoring	EP	2	6.5 to 21.5	Shallow		SA	SA	SA	SA	SA	SA	-	-	Α	Α	Α
OCD-5	Monitoring	EP	2		Shallow		SA	SA	SA	SA	SA	SA			SA	SA	SA
OCD-6	Monitoring	EP	2	8 to 23	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
OCD-7AR	Monitoring	EP	4	5.5 to 19.5	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
OCD-7B	Monitoring	EP	2	43.5 to 52.5	Valley Fill		SA	В	В	В	В	В	-	-	В	В	В
OCD-7C	Monitoring	EP	2	60.25 to 69.75			SA		1	T			to be c		T	1	
OCD-8A	Monitoring	EP	2	3 to 18	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
OCD-8B	Monitoring	EP	2	43.5 to 53	Valley Fill		SA	В	В	В	В	В	-	-	В	В	В

Table 1. 2019 Facility-Wide Groundwater Monitoring Program and Schedule HollyFrontier Navajo Refining LLC - Artesia Refinery, Artesia, New Mexico

	Well Construction <sup>a</sup>									t							
						q	enc				,	Metals			l Frequency <sup>c,</sup> ဖ		-
Well ID	Well Type	Associated Area	Well Diameter (inch)	Screen Interval (ft bgs)	Water Bearing Zone	Historic PSH? <sup>b</sup>		Purge Parameters		GRO	VOCs	As, Ba, Cr, Fe, Pb, Mn, Se	B, Cd, Co, Hg, Ni, U, Va	Cyanide	Cations/Anions	Nitrate / Nitrite as Nitrogen	Tot
-	Monitoring	Field E of Refinery	2	18 to 32	Shallow		SA	SA	SA	-	SA	SA	SA to be c	SA	SA	SA	SA
	Monitoring Monitoring	Field E of Refinery Field E of Refinery	4	18 to 32 30.5 to 49.5	Shallow Valley Fill		SA SA	В	В	_	B B	B	to be c	onecu	eu B	В	В
	Monitoring	Field E of Refinery	2	17 to 33	Shallow		SA f	SA <sup>f</sup>	SA <sup>f</sup>	-	SA <sup>f</sup>	SA <sup>f</sup>	SA <sup>f</sup>	SA <sup>f</sup>	SA <sup>f</sup>	SA <sup>f</sup>	SA <sup>f</sup>
KWB-5	Monitoring	Field E of Refinery	2	24.7 to 38.7	Shallow	Υ	SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
	Monitoring	Field E of Refinery	2	17.5 to 36.5	Shallow	Υ	SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
	Monitoring	Field E of Refinery	2	18 to 32 15 to 34	Shallow Shallow	Y	SA SA	SA SA	SA SA	-	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA
	Monitoring  Monitoring	Field E of Refinery Field E of Refinery	2	20 to 34	Shallow	ī	SA f	A f	A f	-	A f	A f	A f	A f	A f	A f	A f
	Monitoring	Field E of Refinery	4	9 to 29	Shallow	Υ	SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
KWB-11A	Monitoring	Field E of Refinery	4	30 to 39.5	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
	Monitoring	Field E of Refinery	4	50 to 69.5	Valley Fill		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
	Monitoring  Monitoring	Field E of Refinery Field E of Refinery	4	15.5 to 24.5 25.5 to 39.5	Shallow Valley Fill		SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA
	Monitoring	Field E of Refinery	2	23.3 10 39.3	Shallow		В	В	В	- -	В	- -	- -	- -	- -	- -	- -
	Monitoring	Field E of Refinery	2	10 to 30	Shallow		SA	SA	SA	SA	SA	SA	-		SA	SA	SA
MW-58	Monitoring	Field E of Refinery	4	13 to 28	Shallow	Υ	SA	SA	SA	-	SA	SA	SA	SA	SA	SA	SA
	Monitoring	Field E of Refinery	2	25 to 40	Shallow	3.7	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring  Monitoring	Field E of Refinery Field E of Refinery	2	25 to 35 20 to 35	Shallow Shallow	Υ	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	-	-	SA SA	SA SA	SA SA
	Monitoring	Field E of Refinery	2	15 to 25	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	Field E of Refinery	2	19 to 34	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-126B	Monitoring	Field E of Refinery	2	40 to 50	Valley Fill		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	Field E of Refinery	2	20 to 50	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring  Monitoring	Field E of Refinery Field E of Refinery	2	15 to 35 20 to 50	Shallow Shallow	Υ	SA SA	SA A	SA A	SA A	SA A	SA A	-	-	SA A	SA A	SA A
	Monitoring	Field E of Refinery	2	20 to 50	Shallow	Y	SA	SA	SA	SA	SA	SA	-	_	SA	SA	SA
	Monitoring	Field E of Refinery	2	15 to 40	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	Field E of Refinery	2	15 to 35	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	Field E of Refinery	2	20 to 30	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-135 RA-1227	Monitoring Irrigation	Field E of Refinery Field E of Refinery	2 10 / 8	35 to 65 194 to 246	Shallow Artesian		SA NA	SA A <sup>f</sup>	SA	SA	SA A <sup>f</sup>	SA	-	-	SA A <sup>f</sup>	SA A <sup>f</sup>	SA A <sup>f</sup>
RA-3156	Irrigation	Field E of Refinery	4	182 to ?	Artesian		NA	A	_	-	A	-	-	-	A	A	A
RA-4196	Irrigation	Field E of Refinery	8	280 to 292	Artesian		NA	SA	-	-	SA	-	-	-	SA	SA	SA
RA-4798	Irrigation	Field E of Refinery	7	840 to 850	Artesian		NA	SA	-	-	SA	-	-	-	SA	SA	SA
RW-11 <sup>e</sup>	Recovery	Field E of Refinery	36	45 1- 25	Shallow	· ·	SA	Α	A	-	Α	A	-	-	Α	A	A
RW-12R <sup>9</sup> RW-13R <sup>9</sup>	Recovery Recovery	Field E of Refinery Field E of Refinery	12 12	15 to 35 15 to 35	Shallow Shallow	Y	SA SA	A	A	-	A	A	-	-	A	A	A
RW-14R <sup>g</sup>	Recovery	Field E of Refinery	12	15 to 35	Shallow	Y	SA	Α	Α	-	Α	A	-	-	Α	Α	A
RW-18 <sup>e</sup>	Recovery	Field E of Refinery	36		Shallow		SA	Α	-	-	Α	Α	-	-	Α	Α	Α
RW-20	Recovery	Field E of Refinery	4		Shallow	Υ	SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
RW-22	Recovery	Field E of Refinery	12	11.5 to 39	Shallow	Υ	SA	A	A	-	A	A	-	-	A	A	A
	Monitoring  Monitoring	N Refinery N Refinery	6 2	15 to 20 9.75 to 19.25	Shallow Shallow		SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	-	-	SA SA	SA SA	SA SA
	Monitoring	N Refinery	8	0.70 to 10.20	Shallow		SA	<b>Ο</b> , τ	<u> </u>				to be c	ollecte		0, (	0, (
	Monitoring	N Refinery	2	14 to 24	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	N Refinery	2	441 42	Shallow		SA	A	Α	A	Α	A	-	-	A	Α	A
-	Monitoring Monitoring	N Refinery N Refinery	2	14 to 19	Shallow Shallow		SA SA	A	A	A	A	A	-	-	A	A	A
-	Monitoring	N Refinery	6	15.5 to 20.5	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
	Monitoring	N Refinery	2	15 to 30	Shallow		SA	Α	Α	Α	Α	A			Α	A	Α
-	Monitoring	N Refinery	2	15 to 30	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
	Monitoring	N Refinery	4	14 to 29	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring  Monitoring	N Refinery N Refinery	4	14 to 29 12 to 27	Shallow Shallow	Υ	SA SA	SA SA	SA SA	SA SA	SA	SA SA	- SA	- SA	SA SA	SA SA	SA SA
	Monitoring	N Refinery	4	5 to 20	Shallow	1	SA	SA	SA	SA	SA	SA	- -	- -	SA	SA	SA
	Monitoring	N Refinery	4	7 to 22	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	N Refinery	4	5 to 20	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	N Refinery	4	5 to 20	Shallow		SA	A	A	A	A	A	-	-	A	A	A
	Monitoring  Monitoring	N Refinery	4	5 to 20	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring Monitoring	N Refinery N Refinery	4	7 to 22 7 to 22	Shallow Shallow		SA SA	A SA	A SA	A SA	A SA	A SA	-	-	A SA	A SA	A SA
		. • · · · · · · · · · · · · · · · · · ·	T	,	-11411011	i l	<b>∵</b> / \	<b>∵</b> ′ ∖	_ ~ \	. · · ·	, \						_ U/\
	Monitoring	N Refinery	4	8 to 23	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA

Table 1. 2019 Facility-Wide Groundwater Monitoring Program and Schedule HollyFrontier Navajo Refining LLC - Artesia Refinery, Artesia, New Mexico

			ج			ncy <sup>c,</sup>	, c, d										
Well ID	Well Type	Associated Area	_ `	Screen Interval (ft bgs)	Water Bearing Zone	Historic PSH? <sup>b</sup>	Gauging Frequency	Purge Parameters		GRO	VOCs	As, Ba, Cr, Fe, Pb, Mn, Se	B, Cd, Co, Hg, sland, U, Va	Cyanide	Cations/Anions	Nitrate / Nitrite as Nitrogen	Total Dissolved Solids
l	Monitoring	N Refinery	2	10 to 30	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
	Monitoring	N Refinery	2	10 to 25	Shallow	Y	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
RW-1R <sup>g</sup> RW-2R <sup>g</sup>	Recovery	N Refinery N Refinery	12 12	15 to 35 14.5 to 34.5	Shallow Shallow	Y	SA SA	A	A	A	A	A A	-	-	A	A A	A
RW-7R <sup>g</sup>	Recovery	N Refinery	12	14.5 to 34.5	Shallow	Y	SA	A	A	A	A	A	_	_	A	A	A
RW-8R <sup>g</sup>	Recovery	N Refinery	12	14.5 to 34.5	Shallow	Y	SA	Α	Α	-	Α	A	-	_	A	Α	A
RW-9	Recovery	N Refinery	36		Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
RW-10	Recovery	N Refinery	36		Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
RW-16 <sup>e</sup>	Recovery	N Refinery	36		Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
RW-17 <sup>e</sup>	Recovery	N Refinery	36		Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
	Monitoring	N RO Reject Field	2	10 to 25	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	N RO Reject Field	2	10 to 25	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-119 MW-18	Monitoring Monitoring	N RO Reject Field NCL	2 8	10 to 25 15 to 19	Shallow Shallow		SA SA	SA A	SA A	SA	SA A	SA A	- A	- A	SA A	SA A	SA A
	Monitoring	NCL	2	13 10 19	Shallow		SA	Α	A	_			to be c			A	
	Monitoring	NCL	2	10.5 to 15.5	Shallow		SA	SA	SA	-	SA	SA	SA	SA	SA	SA	SA
MW-53	Monitoring	NCL	2	13.8 to 23.8	Shallow		SA	Α	Α	-	Α	A	-	-	Α	A	Α
MW-54A	Monitoring	NCL	2	12.7 to 27.7	Shallow		SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
MW-54B	Monitoring	NCL	2	33.8 to 43.8	Valley Fill		SA	В	В	В	В	В	-	-	В	В	В
-	Monitoring	NCL	2	13.7 to 23.7	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
	Monitoring	NCL	2	13.4 to 23.4	Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
-	Monitoring	NCL	4	9 to 24	Shallow		SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
	Monitoring	NCL	2	13 to 18	Shallow		SA	SA	SA	-	SA	SA	-	-	SA	SA	SA SA
NCL-32 NCL-33	Monitoring Monitoring	NCL NCL	2	17 to 22 13 to 18	Shallow Shallow		SA SA	SA SA	SA SA	-	SA SA	SA SA	-	-	SA SA	SA SA	SA
NCL-34	Monitoring	NCL	2	16 to 21	Shallow	Υ	SA	SA	SA		SA	SA	_	_	SA	SA	SA
NCL-44	Monitoring	NCL	2	10 10 21	Shallow	-	SA	SA	SA	-	SA	SA	_	_	SA	SA	SA
	Monitoring	NCL	2	16.8 to 17.8	Shallow		SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
	Monitoring	S Refinery	2		Shallow	Υ	SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
KWB-4	Monitoring	S Refinery	2	20 to 39	Shallow	Υ	SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
MW-28	Monitoring	S Refinery	6	25 to 30	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
MW-48	Monitoring	S Refinery	2	19 to 34	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-50	Monitoring	S Refinery	2	12 to 27	Shallow		SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
MW-52	Monitoring	S Refinery	2	19 to 34	Shallow		SA	SA	SA	SA	SA	SA	SA	SA	SA	SA	SA
	Monitoring	S Refinery	4	15 to 30	Shallow	Y	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-65 MW-66	Monitoring Monitoring	S Refinery S Refinery	4	14.5 to 29.5 14.6 to 29.6	Shallow Shallow	Υ	SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	SA	- SA	SA SA	SA SA	SA SA
MW-99	Monitoring	S Refinery	4	12 to 27	Shallow	Υ	SA	SA	SA	SA	SA	SA	- -	-	SA	SA	SA
MW-101	Monitoring	S Refinery	4	8 to 23	Shallow	-	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-102	Monitoring	S Refinery	4	12 to 27	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-103	Monitoring	S Refinery	4	7 to 22	Shallow		SA	Α	Α	Α	Α	Α	-	_	Α	Α	Α
MW-104	Monitoring	S Refinery	4	3 to 18	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-105	Monitoring	S Refinery	4	8 to 18	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
l	Monitoring	S Refinery	4	11 to 26	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-107	Monitoring	S Refinery	4	12 to 22	Shallow		SA	A	A	A	A	A	-	-	A	A	A
MW-109	Monitoring	S Refinery	2	15 to 29.5	Shallow		SA SA	SA SA	SA SA	SA	SA SA	SA	-	-	SA	SA	SA SA
MW-110 MW-130	Monitoring Monitoring	S Refinery S Refinery	2	15 to 29.5 30 to 45	Shallow Shallow		SA	SA	SA	SA SA	SA	SA SA	<del>-</del>	<del>-</del>	SA SA	SA SA	SA
RA-313	Irrigation	S Refinery	10	904 to 1157	Artesian		NA	A	-	-	A	-	-	-	A	A	A
RW-4R <sup>g</sup>	Recovery	S Refinery	12	14.5 to 34.5	Shallow	Υ	SA	Α	Α	-	Α	Α	_	-	Α	Α	Α
RW-5R <sup>g</sup>	Recovery	S Refinery	12	13 to 33	Shallow	Υ	SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
RW-6R <sup>g</sup>	Recovery	S Refinery	12	14.5 to 34.5	Shallow	Υ	SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
RW-15 <sup>e</sup>	Recovery	S Refinery	36		Shallow	Υ	SA	Α	Α	-	Α	Α	-		Α	Α	Α
RW-19	Recovery	S Refinery	12	11 to 46	Shallow	Υ	SA	Α	Α	-	Α	A	-	-	Α	A	A
MW-114	Monitoring	S RO Reject Field	2	20 to 35	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-115 MW-116	Monitoring Monitoring	S RO Reject Field S RO Reject Field	2	10 to 25 10 to 25	Shallow Shallow		SA SA	SA SA	SA SA	SA SA	SA SA	SA SA	-	-	SA SA	SA SA	SA SA
MW-49	Monitoring	TEL	2	10 to 25	Shallow		SA	SA	SA	SA	SA	SA	SA	- SA	SA	SA	SA
TEL-1	Monitoring	TEL	2	13 to 23	Shallow		SA	SA	SA	SA	SA	SA	- -	-	SA	SA	SA
TEL-2	Monitoring	TEL	2	13 to 23	Shallow		SA	SA	SA	SA	SA	SA	_	-	SA	SA	SA
-	Monitoring	TEL	2	13 to 23	Shallow	Υ	SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
	Monitoring	TEL	2	13 to 23	Shallow		SA	SA	SA	SA	SA	SA	_		SA	SA	SA
MW-8	Monitoring	TMD	2		Shallow		SA	Α	Α	Α	Α	Α	-	-	Α	Α	Α
	Monitoring	TMD	2		Shallow		SA		1	1		mples	to be c	ollect	1	1	
MW-16	Monitoring	TMD	4	8.5 to 19	Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
MW-20	Monitoring	TMD	4	9.5 to 23.5	Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α

## Table 1. 2019 Facility-Wide Groundwater Monitoring Program and Schedule HollyFrontier Navajo Refining LLC - Artesia Refinery, Artesia, New Mexico

			W	ell Constructio	n <sup>a</sup>		<u>ج</u>	Analytical Suite and Frequency c, d									
Well ID	Well Type	Associated Area	Well Diameter (inch)	Screen Interval (ft bgs)	Water Bearing Zone	Historic PSH? <sup>b</sup>	Gauging Frequency	Purge Parameters	DRO	GRO	NOCs		B, Cd, Co, Hg, sl Ni, U, Va	Cyanide	Cations/Anions	Nitrate / Nitrite as Nitrogen	Total Dissolved Solids
MW-21	Monitoring	TMD	4	7.5 to 22	Shallow		SA	SA	SA	SA	SA	SA	-	-	SA	SA	SA
MW-25	Monitoring	TMD	2	15.75 to 25.25	Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
MW-26	Monitoring	TMD	2	15.25 to 24.25	Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
MW-27	Monitoring	TMD	2	18.25 to 27.75	Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
MW-46R	Monitoring	TMD	2	3.5 to 18.5	Shallow		SA	SA	SA	-	SA	SA	-	-	SA	SA	SA
MW-68	Monitoring	TMD	2	14.75 to 24.5	Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
MW-71	Monitoring	TMD	2	9.75 to 19.5	Shallow		SA	Α	Α	-	Α	Α	Α	Α	Α	Α	Α
MW-89	Monitoring	TMD	4	2 to 17	Shallow		SA	Α	Α	-	Α	Α	-	-	Α	Α	Α
NP-1	Monitoring	TMD	2	9.5 to 19	Shallow		SA	SA	-	-	SA	-	-	-	Α	Α	Α
NP-2	Monitoring	TMD	2	9.5 to 18.5	Shallow		SA				No sa	amples	to be c	ollect	ed		
NP-3	Monitoring	TMD	2	9.5 to 18.5	Shallow		SA				No sa	amples	to be c	ollect	ed		
NP-4	Monitoring	TMD	2	24.5 to 33.5	Shallow		SA				No sa	amples	to be c	ollect	ed		
NP-6	Monitoring	TMD	2	8.75 to 18.75	Shallow		SA	В	-	-	В	-	-	-	-	-	-
NP-8	Monitoring	TMD	2		Shallow		SA				No sa	amples	to be c	ollect	ed		
NP-9	Monitoring	TMD	2		Shallow		SA				No sa	amples	to be c	ollect	ed		
UG-1	Monitoring	Up-gradient	4	8 to 23	Shallow		Α	Α	Α	Α	Α	Α	Α	Α	Α	Α	Α
UG-2	Monitoring	Up-gradient	4	15 to 30	Shallow		Α	Α	Α	Α	Α	Α	Α	Α	Α	Α	Α
UG-3R	Monitoring	Up-gradient	4	17 to 37	Shallow		Α	Α	Α	Α	Α	Α	Α	Α	Α	Α	Α
UG-4	Monitoring	Up-gradient	2	19.5 to 39.5	Shallow		Α	Α	Α	Α	Α	Α	Α	Α	Α	Α	Α

Note: Blank cells indicate that information is not available or applicable.

### Abbreviations:

A = Annual (March/April event)

B = Biennial (March/April event in odd calendar years)

NA = Not accessible

NCL = North Colony Landfarm

DRO = Diesal Range Organics

OCD = Oil Conservation District

E = East S = South

EP = Evaporation Ponds SA = Semi-annual (March/April and September/October events)

ft bgs = feet below ground surface TEL = Tetra Ethyl Lead Impoundment

ft btoc = feet below top of casing TMD = Three Mile Ditch

ft MSL = feet Mean Sea Level TPH = Total Petroleum Hydrocarbons
GRO = Gasoline Range Organics VOCs = Volatile Organic Compounds

N = North Y = Yes

### Footnotes:

<sup>a</sup> Available well construction information provided.

- 1. Purge parameters pH, temperature, specific conductivity, dissolved oxygen, oxygen-reduction potential, and turbidity will be measured and recorded in the field.
- 2. Diesel Range Organics (DRO) by Method 8010Mod.
- 3. Gasoline Range Organics (GRO) by Method 8010Mod.
- 4. Volatile organic compounds (VOCs) by Method 8260, to include methyl tert butyl ether (MTBE) and naphthalene.
- 5. Total metals by Method 6010/6020 and/or 7470. Specific metals shown in table heading (symbols from periodic chart).
- 6. Dissolved metals same list as total metals, but only analyzed during March/April event.
- 7. Cyanide by Method SM4500.
- 8. Cations/anions to include Calcium, Potassium, and Sodium by Method 6010 or 6020 and Chloride, Fluoride, and Sulfate by Method 300 or 9056.
- 9. Nitrates/Nitrites as Nitrogen by Method 300.
- 10. Total Dissolved Solids by Method 2540C.
- "-" indicates parameter not required.

Note - samples will not be collected from any well where PSH is measured to be 0.03 feet thick or greater

<sup>&</sup>lt;sup>b</sup> PSH was present during previous groundwater monitoring events or a recovery pump is in place. Recovery wells are gauged at least monthly.

<sup>&</sup>lt;sup>c</sup> Analytical Suite to include the following:

d Groundwater will be purged and sampled from wells as indicated using either a peristaltic pump (for sampling depths of approximately 25 feet bgs or less) or a dedicated, stainless steel submersible pump (for sampling depth greater than 25 feet bgs).

e Recovery trenches 11, 15, 16, 17, and 18 have multiple "wells". Gauging and sampling points are as follows: RW #11-0, RW #15C, RW #16B, RW #17A, and RW #18A.

<sup>&</sup>lt;sup>f</sup>Wells will be gauged and/or sampled only if the landowner grants access.

<sup>&</sup>lt;sup>9</sup> Recovery well RW-1, RW-2, RW-4, RW-5, RW-6, RW-7, RW-8, RW-12, RW-13, and RW-14 will be sampled instead if a recovery pump is installed in associated recovery well RW-1R, RW-2R, RW-4R, RW-5R, RW-6R, RW-7R, RW-12R, RW-13R, and RW-14R.