



## Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

March 29, 2021

Mr. Kevin Pierard, Chief  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Bldg. 1  
Santa Fe, NM 87505-6303

**RE: Response to Approval with Modifications**  
**Revised Investigation Work Plan North Drainage Ditch Area**  
**Marathon Petroleum Company LP, Gallup Refinery**  
**(dba Western Refining Southwest LLC)**  
**EPA ID# NMD000333211**  
**HWB-WRG-19-009**

Dear Mr. Kieling:

Marathon Petroleum Company LP (dba Western Refining Southwest LLC) Gallup Refinery is submitting the enclosed responses to your comments dated March 4, 2021 on the referenced Work Plan. The Work Plan has been revised per your comments and enclosed for your review is a revised copy of Figure 2. If there are any questions, please call John Moore at 505-879-7643.

### 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.*

Sincerely,  
**Marathon Petroleum Company LP, Gallup Refinery**

A handwritten signature in cursive script that reads "Robert S. Hanks".

Robert S. Hanks  
Refinery General Manager

Enclosure

cc D. Cobrain, NMED HWB  
M. Suzuki, NMED HWB  
C. Chavez NMOCD  
G. McCartney, Marathon Petroleum Company  
K. Luka, Marathon Petroleum Company  
J. Moore, Marathon Gallup Refinery  
H. Jones, Trihydro Corporation  
S. Crouch, DiSorbo Consulting, LLC

**RESPONSE TO COMMENTS**  
**March 4, 2021 Approval with Modifications –**  
**Revised Investigation Work Plan North Drainage Ditch Area**  
**(September 2019)**

**NMED Comment 1:**

The response to NMED's Disapproval Comment 2 states, “[t]he missing historic borings [01117-B1, 01117-B2, 648, 643, 649, 651, 652, 665, 656, 657, MP-4, MP-5, MP-9, B-1, and B-3] are included in Appendix B...” The boring logs are appropriately included in Appendix B; however, the Work Plan does not include a figure that identifies the location of the borings. Provide a figure that identifies the location of the historic borings.

**MPC Response 1:**

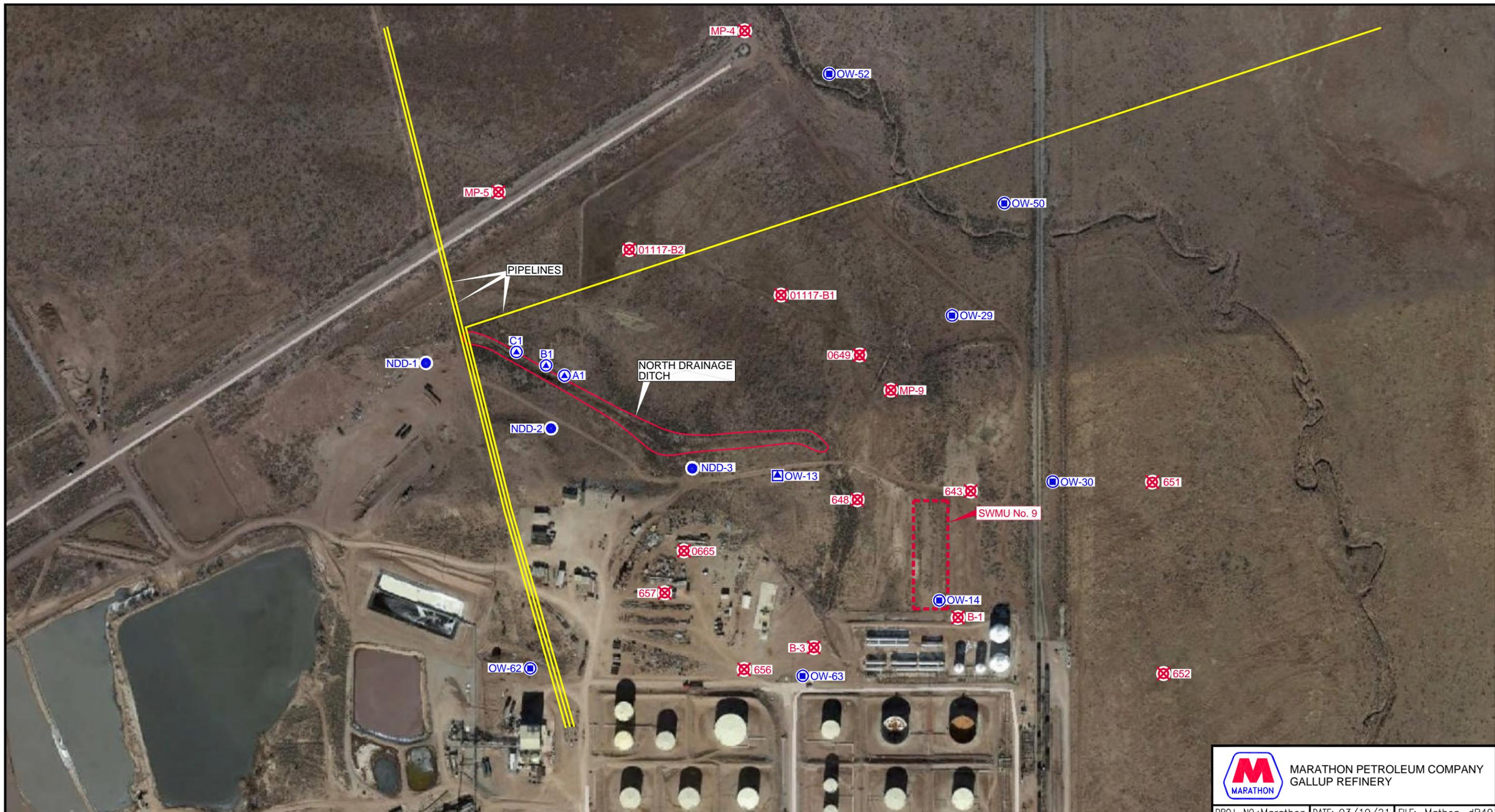
Figure 2 in the Work Plan has been revised to include the location of the historic borings. Attached to this correspondence is a copy of Figure 2.

**NMED Comment 2:**

The response to NMED's Disapproval Comment 12 states, “we acknowledge the comment and will take this into consideration during report preparation as to which constituents are included in the data summary tables.” Note that NMED’s Disapproval Comment 12 does not allow the Permittee to selectively report detected constituents. All constituents detected above their corresponding detection limits must be identified in the data summary tables of the investigation report.

**MPC Response 2:**

The comment is acknowledged and Marathon will identify all constituents detected above their corresponding detection limits in the data summary tables of the investigation report.



Aerial Map Source: Google Map, 02/19/2014.

**MARATHON** MARATHON PETROLEUM COMPANY  
GALLUP REFINERY

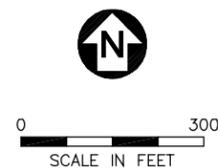
PROJ. NO.: Marathon | DATE: 03/19/21 | FILE: Mathon-dB49

FIGURE 2  
INVESTIGATION AREA

**DiSorbo** Environmental Consulting Firm  
8501 N. MoPac Expy.  
Suite 300  
Austin, Texas 78759

LEGEND

- A1 SURFACE WATER SAMPLE LOCATION AND IDENTIFICATION NUMBER
- NDD-1 TEMPORARY MONITORING WELL LOCATION AND IDENTIFICATION NUMBER
- OW-13 SONSELA MONITORING WELL LOCATION AND IDENTIFICATION NUMBER
- OW-14 ALLUVIUM/CHINLE GP MONITORING WELL LOCATION AND IDENTIFICATION NUMBER
- MP-5 HISTORIC SOIL BORING LOCATION AND IDENTIFICATION NUMBER



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 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
 Action 22242

**CONDITIONS**

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 22242
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

**CONDITIONS**

Created By	Condition	Condition Date
jburdine	Accepted for Record Retention Purposes-Only	11/21/2022