



Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39
Jamestown, NM 87347

April 22, 2022

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

**RE: Response to Approval with Modifications, Natural Attenuation Assessment and Proposed Work Plan for the Hydrocarbon Seep Area
Western Refining Southwest LLC, Gallup Refinery
EPA ID #NMD000333211
HWB-WRG-20-023**

Dear Mr. Pierard:

Attached please find the response to comments contained in the New Mexico Environment Department (NMED) above referenced Approval with Modifications letter dated April 5, 2022. A copy of the letter on CD is included.

The document timeline is summarized below:

- Natural Attenuation Assessment and Proposed Workplan for the Hydrocarbon Seep Area, submitted December 15, 2020
- *Disapproval*, received January 26, 2021
- Response to Disapproval, submitted August 27, 2021
- *Approval with Modifications*, received September 28, 2021
- Response to Approval with Modifications, submitted December 21, 2021
- *Approval with Modifications*, received April 5, 2022.

If you have any questions or comments regarding the information contained herein, please do not hesitate to contact Mr. John Moore at (505) 879-7643.



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Certification

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

Western Refining Southwest LLC, Marathon Gallup Refinery

A handwritten signature in cursive script that reads "Ruth A. Cade".

Ruth Cade
Vice-President

Attachments

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
M. Suzuki, NMED HWB
L. Barr, NMOCD
L. King, EPA Region 6
M. Bracey, Marathon Petroleum Corporation
K. Luka, Marathon Petroleum Corporation
J. Moore, Marathon Gallup Refinery
H. Jones, Trihydro Corporation

ATTACHMENT 1
RESPONSE TO COMMENT

New Mexico Environment Department (NMED) to Marathon Gallup Refinery (Refinery) Comment Letter “Response to Approval with Modifications – Natural Attenuation Assessment and Proposed Workplan for the Hydrocarbon Seep Area” (April 5, 2022)

NMED Comments	Refinery Responses
Comment 1:	Response 1:
<p>In the response to NMED’s Approval with Modifications Comment 4, the Permittee states, “[g]as chromatograph [sic] and electron capture (Method 504.1) is not approved for the [chlorinated volatile organic compounds] CVOCs of interest.” It is not NMED's intention to suggest that only Method 504.1 should be used to analyze the CVOCs. There are other methods that can be used to separate analytical methods where the dilution of the hydrocarbon constituents is unnecessary and chlorinated compounds can be quantified with greater sensitivity as required by Comment 4. If an alternate analytical method can achieve lower detection limits for the CVOCs of interest, please evaluate the applicability of that method for this investigation and propose to use the analytical method in the response letter.</p>	<p>The Refinery will work with Hall Environmental Analysis Laboratory to ensure that samples are only diluted as necessary. United States Environmental Protection Agency approved alternative analytical methods will be evaluated in the 2023 Facility Wide Groundwater Monitoring Work Plan.</p>

ATTACHMENT 2
ELECTRONIC RESPONSE ON CD

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 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 101034

CONDITIONS

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 101034
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
scwells	Accepted for Record Retention Purposes-Only	11/23/2022