



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

**Certified Mail - Return Receipt Requested**

March 17, 2023

Kawika Tupou  
Environmental Manager  
HollyFrontier Navajo Refining LLC  
P.O. Box 159  
Artesia, New Mexico 88211-0159

**RE: APPROVAL WITH MODIFICATIONS  
AOC 17 (ALKYLATION OIL/WATER SEPARATOR)  
PARTIAL ABANDONMENT WORK PLAN, MARCH 2023  
HF SINCLAIR NAVAJO REFINING LLC – ARTESIA REFINERY  
EDDY COUNTY, ARTESIA, NEW MEXICO  
EPA ID NO. NMD048918817  
HWB-NRC-23-003**

Dear Mr. Tupou:

The New Mexico Environment Department (NMED) is in receipt of the HF Sinclair Navajo Refining LLC - Artesia Refinery (Permittee) *AOC 17 (Alkylation Oil/Water Separator) Partial Abandonment Work Plan* (Work Plan), dated March 2, 2023, and received March 6, 2023. NMED has reviewed the Work Plan and hereby issues this Approval with the following modifications:

**Comment 1**

In the *Scope of Work*, page 6, bullet items 1 through 3, the Permittee summarizes the activities that will take place at Cell 1. The Permittee must also visually inspect Cell 1 for cracks and photograph the inside the unit prior to the capping activities. Revise the appropriate sections of the Work Plan to include visual inspection and photos of Cell 1 prior to the capping activities. The Permittee must also discuss the inspection of Cell 1 and provide the photos of Cell 1 in the letter report. Provide replacement pages as appropriate with the response letter.

**Comment 2**

In the *Soil Confirmation Samples* section, page 7, the Permittee states that "[f]our soil borings will be advanced to collect confirmation soil samples at the locations shown on Figure 5...Soil samples will be continuously collected using a DPT dual tube sample or equivalent sampling tool and logged for lithology, moisture content, and any indication of hydrocarbon impacts (staining,

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Hazardous Waste Bureau - 2905 Rodeo Park Drive East, Building 1, Santa Fe, New Mexico 87505-6313  
Telephone (505) 476-6000 - [www.env.nm.gov](http://www.env.nm.gov)

Mr. Tupou  
March 17, 2023  
Page 2

odor, and photoionization detector [PID] readings.)” Address the following:

- a. The four soil sample locations appear to be in the corners of AOC 17. However, based on Figure 4 (Plot Plan Including Underground Sewer Piping WWT/API Separator Area), there may be enough room on the south side of Cell 1 to collect an additional sample. Collect an additional sample adjacent south of Cell 1, approximately at the location in red (see mark up of Figure 4) or explain why a boring cannot be completed at this location in the response letter.
- b. The Permittee must discuss the recorded observations of the hydrocarbon impacts at each sample location in the letter report.
- c. The Permittee did not state the PID lamp strength proposed to be used to collect the PID readings. Groundwater data at TEL-4 (approximately 110 feet northeast of AOC 17) indicates exceedances of TPH-DRO, TPH-GRO and benzene. Ensure that the PID lamp used is appropriate while collecting PID readings.
- d. The AOC 17 boundary in Figures 4 and 5 do not appear to match up. Ensure the boundaries are to scale in both figures so that the figures and soil sample locations are comparable.
- e. The aerial photo used in Figure 5 is not clear. Use a clear aerial photo to depict the site location and proposed soil sampling locations in letter report. A clear aerial photo must be used for all future submittals.

### **Comment 3**

Figure 3 (AOC 17 Map) depicts some AOC, HWMU, and SWMU boundaries as well as well locations and nearby tanks. However, AOC 17 and the tanks are the only locations identified in Figure 3. For future submittals, label surrounding AOC, HWMU, and SWMU locations and monitoring wells depicted in the figures. Ensure this information is included in the figures submitted with the letter report.

### **Comment 4**

Figure 4 depicts the WWT/API Separator area. Cells 1, 2, and 3 and the boundary for the Oil/Water Separator Unit have been labeled on Figure 4. For future submittals, include additional boundaries for nearby AOCs and SWMUs. The figures must also include a scale. Ensure all figures in the letter report and future submittals identify nearby AOCs and SWMUs and provide scales.

This approval is based on the information presented in the document as it relates to the objectives of the work identified by NMED at the time of review. Approval of this document does not constitute agreement with all information, or every statement presented in the document.

Mr. Tupou  
March 17, 2023  
Page 3

Should you have any questions, please contact Leona Tsinnajinnie of my staff at 505-690-7820.

Sincerely,



Dave Cobrain  
Acting Chief  
Hazardous Waste Bureau

cc: L. Tsinnajinnie, NMED HWB  
S. Wells, NMED EMNRD OCD  
M. Holder, HFSNR LLC, Artesia Refinery  
L. King EPA Region 6 (6LCRRC)

File: Reading File and NRC 2023 file



**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 197946

CONDITIONS

Operator: NAVAJO REFINING COMPANY, L.L.C. P.O. Box 159 Artesia, NM 88211	OGRID: 15694
	Action Number: 197946
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
scwells	Accepted for Records Retention Purposes Only	3/16/2023