



Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39
Jamestown, NM 87347

March 31, 2023

Mr. Dave Cobrain, Interim Chief
New Mexico Environmental Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

**RE: Area of Concern 35 Process Sewer Investigation Work Plan
Western Refining Southwest LLC, D/B/A Marathon Gallup Refinery
EPA ID #NMD000333211**

Dear Mr. Cobrain:

Western Refining Southwest LLC, D/B/A Marathon Gallup Refinery is submitting this Area of Concern 35 Process Sewer Investigation Work Plan as requested in the New Mexico Environment Department (NMED) in Comment 8 of "Approval with Modifications Revised Investigation Work Plan No. 2 Area of Concern 35" dated December 12, 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 or Ms. Kateri Luka at (714) 713-1218.

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

Timothy J. Peterkoski
Director of Environment and Climate Strategy
Marathon Petroleum Company LP

Enclosure

cc: L. Andress, NMED HWB
S. Well, NMOCD
J. Moore, Marathon Gallup Refinery

L. King, EPA Region 6
K. Luka, Marathon Petroleum Company
H. Jones, Trihydro Corporation



Process Sewer Investigation Work Plan

Area of Concern 35

Process Sewer Investigation Work Plan



Marathon Gallup Refinery
Western Refining Southwest, LLC
Gallup, New Mexico

EPA ID# NMD000333211

March 2023



Process Sewer Investigation Work Plan

Executive Summary

Western Refining Southwest LLC, D/B/A Marathon Gallup Refinery (Refinery) is submitting this “Area of Concern 35 Process Sewer Investigation Work Plan” as requested in the New Mexico Environmental Department in Comment 8 of “Approval with Modifications Revised Investigation Work Plan No. 2 Area of Concern 35” dated December 12, 2022 (NMED 2022).

Area of Concern (AOC) 35 contains the main trucking loading rack, the crude slop and ethanol unloading facility, the additive tank farm loading rack, and the marketing tank farm. The process sewer is used to carry oily wastewater to be treated at the Refinery. In 2019, work was completed on the process sewer lines after the historical dye tests were implemented (i.e., repairs/replacements and installation of additional lines). This investigation work plan will discuss proposed methods to assess the current integrity of the process sewer system in the vicinity of AOC 35.

Smoke testing will be completed in the process sewer lines contained in AOC 35. Smoke testing is a common method of identifying breaks and undocumented connections in sewer systems. If leaks are identified, the leaks will be marked and mapped. The Refinery will prepare an investigation report summarizing the smoke test results within 150 days of field investigation completion.



Process Sewer Investigation Work Plan

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Process Sewer Investigation Work Plan

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Process Sewer Investigation Work Plan

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Process Sewer Investigation Work Plan

List of Acronyms

amsl	above mean sea level
AOC	Area of Concern
cm/sec	centimeters per second
ft	foot or feet
GPS	global positioning system
MKTF	marketing tank farm
MTBE	methyl tert butyl ether
NM	New Mexico
NMED	New Mexico Environment Department



Process Sewer Investigation Work Plan

1.0 Introduction

Western Refining Southwest LLC, D/B/A Marathon Gallup Refinery (Refinery) is submitting this Area of Concern (AOC) 35 Process Sewer Investigation Work Plan as requested by the New Mexico Environment Department (NMED) in Comment 8 of "Approval with Modifications Revised Investigation Work Plan No. 2 Area of Concern 35" dated December 12, 2022 (NMED 2022). This investigation work plan will discuss methods to determine the integrity of the process sewer system in the vicinity of AOC 35 (Figure 1-2). The process sewer is used to carry oily wastewater to be treated at the Refinery. AOC 35 is in the southwest portion of the Refinery. It includes the Main Truck Loading Racks/Crude Slop, the Ethanol Unloading Facility, the Loading Rack Additive Tank Farm, and the Market Tank Farm. Historical dye tests and camera scope activity in this area indicated potential leaks from the process sewer system; however, Refinery personnel repaired and replaced portions of the process sewer system after the 2013 dye tests. This investigation will identify, if present, areas of the sewer still requiring repair.

The Refinery is located approximately 17 miles east of Gallup, New Mexico (NM) along the north side of Interstate Highway I-40 in McKinley County. The physical address is I-40, Exit #39 Jamestown, NM 87347. The Refinery is located on 810 acres. Figure 1-1 presents the Refinery location and the regional vicinity.

The Refinery has been indefinitely idled since August 2020. Historically, the Refinery generally processed crude oil transported to the facility by pipeline or tanker truck. Various process units were operated at the facility, including crude distillation, reforming, fluidized catalytic cracking, alkylation, sulfur recovery, merox treater, and hydrotreating. Refinery operations have produced gasoline, diesel fuels, jet fuels, kerosene, propane, butane, and residual fuel.



2.0 Background

This section presents background information detailing the various components of AOC 35 and discussion of historical dye tests and camera scope activities in the process sewer contained in AOC 35. AOC 35 contains the main trucking loading rack, the crude slop and ethanol unloading facility, the additive tank farm loading rack, and the marketing tank farm.

2.1 Main Truck Loading Rack Area

The main truck loading rack is in the southwestern area of the formerly active Refinery (Figure 1-2). The main loading racks cover an area approximately 100 feet (ft) by 120 ft and were used to load refined petroleum products (e.g., gasoline and diesel) into tanker trucks. The loading racks appear to have been in operation in this same location since at least 1962.

The process sewer line near the main truck loading rack travel from the lab building to the loading rack and then continue to the north after picking up discharge from the loading rack sumps (Figure 1-2). The sumps were used to collect small spills on the loading rack concrete apron and de minimis volumes of product that drained from loading hoses.

2.2 Crude Slop and Ethanol Unloading Facility

The crude slop and ethanol unloading facility is located approximately 80 ft northwest of the main truck loading racks (Figure 1-2) and was used to unload recovered oil and transmix reclaimed from various locations within the Refinery. The area was also used to unload ethanol delivered to the Refinery via truck. The exact start of date of operation is unknown with records dating back to before the 1990s. The unloading area is approximately 15 ft by 40 ft and includes a concrete pad and sump, overhead pipelines, and various connections to support unloading operations. The concrete pad and sump are connected to the process sewer.

2.3 Additive Tank Farm Loading Rack

Petroleum product additives were stored in aboveground tanks at the additive tank farm loading rack (Figure 1-2). These additive tanks are small aboveground tanks located approximately 150 ft west of the main loading rack. The additive tanks were installed prior to 1997, but the exact date is uncertain. Only products (i.e., fuel additives) were managed in this area; wastes and methyl tert butyl ether (MTBE) were not stored in these tanks. The additive tanks were taken out of service and cleaned during the 2020/2021 calendar years. There are no products stored in any additive tanks at the time this investigation work plan was prepared.

2.4 Marketing Tank Farm

The marketing tank farm (MKTF) is located approximately 150 ft northwest of the main loading rack and includes Tanks 1 through 8, 912, 913, 1001, and 1002 (Figure 1-2). Retail petroleum products (e.g., gasoline, diesel, and biodiesel) were stored in these tanks. MTBE was stored in Tank 6 until 2006; ethanol was stored in Tank 6 after the use of MTBE was discontinued. The first tanks were constructed



Process Sewer Investigation Work Plan

in 1963 and have had routine external and internal inspections since construction. The MKTF tanks have been cleaned and emptied and remain in place.

The fuels were delivered to the marketing tanks via primarily aboveground pipelines. Ethanol was unloaded at the adjacent ethanol unloading facility and transferred to Tanks 5 and 6 via aboveground lines. The fuels and additives were subsequently transferred to the main loading racks via aboveground and underground pipelines where they were loaded into tanker trucks.

2.5 Historical AOC 35 Process Sewer Investigations

The process sewer lines that are present in the area (Figure 1-2) were evaluated in the past to determine if they could be leaking. After the discovery of hydrocarbons in Hydrocarbon Seep Area on June 26, 2013, an investigation into the source was summarized in "Interim Measures Report Hydrocarbon Seep Area" submitted July 28, 2016 (Western 2016). On July 8, 2013, one pint of fluorescent FWT red dye was poured into a sump/drain at the second bay from the south end at the truck loading rack. After several minutes, the red dye was observed in the sewer box located on the west side of the heat exchanger bundle cleaning pad, identifying the flow of the drain from the truck rack to the north in the main process sewer pipeline.

Subsequently, a second pint of FWT red dye was added to the sewer box on the west side of the bundle pad. Excavations at the previously identified hydrocarbon seep area (located west of the crude tanks) were inspected each day after addition of the dye and on the 8th day (July 16, 2013) red dye was identified in one of the excavations. The dye was not initially detected in the soil borings/temporary wells located south the hydrocarbon seep and west of the marketing tanks, but only in the area where the seep was identified. During a later fluid gauging event on August 14, 2013, dye was observed in MKTF-03 and MKTF-10 (Figure 1-2). The presence of dye in groundwater in the area of the seep was interpreted as indicating a likely release from the sewer system and a possible preferential migration pathway to the northwest.

Following the results of the July 2013 dye test, two additional dye tests were conducted in the process sewer system. On September 23, 2013, one pint of a yellow/green dye (Spectroline Oil-Glo 44G Fluorescent yellow/green) was introduced into the sewer at the Crude Slop and Ethanol Unloading area. On September 24, 2013, one pint of a FWT red dye was introduced at the lab sinks. On September 25, 2013, green dye was detected at the hydrocarbon seep. A fluid level gauging event was conducted at the MKTF monitoring wells on September 26, 2013; the red dye was identified in five temporary wells and several were subsequently kept as permanent monitoring wells [SB01 (MKTF-03), SB02, SB16 (MKTF-10), SB17 (MKTF-11), and SB22 (MKTF-14)] (Figure 1-2), all of which are located just south of the road that runs east-west along the north side of the marketing tanks. The green/yellow dye appeared to be present in these locations [SB04, SB05, SB06 (MKTF-05), SB08 (MKTF-06), SB10 (MKTF-07)] (Figure 1-2) closer to the crude slop and ethanol unloading area. Although the dye tests were not conclusive, the separate patterns of the two dyes suggest the possibility of two separate release points from the process sewer line.



Process Sewer Investigation Work Plan

Since the 2013 dye tests, repair work and installation of additional process sewer lines has occurred in the vicinity of AOC 35. In 2019, portions of the main process sewer lines near the MKTF were visually inspected using a camera and were determined to be in good condition with no breaks. Smaller lines were not inspected so the condition of those lines is unknown. No further dye testing was completed after the repairs in 2019. The Refinery is indefinitely idled at this time and the sewer is currently not in operation and has been blocked off via inflatable plugs.



3.0 Site Conditions

This section presents background information detailing the site condition. Average rainfall at the Refinery is less than 7 inches per year, although it can vary to slightly higher levels elsewhere in the county, depending on elevation. Erosion features such as arroyos are present in portions of the property.

3.1 Surface Conditions

Site topographic features include high ground in the southeast gradually decreasing to a lowland fluvial plain to the northwest. Elevations on the Refinery property range from 7,040 ft above mean sea level (amsl) to 6,860 ft amsl. Surface soils within most of the area of investigation are primarily Rehobeth silty clay loam. Rehobeth soil properties include a pH ranging from 8 to 9 standard units and salinity naturally occurring and typically measuring up to approximately 8 millimhos per centimeter.

The site is in the Puerco River Valley, north of the Zuni Uplift with overland flows directed northward to the tributaries of the Puerco River. The Puerco River continues to the west to the confluence with the Little Colorado River. The South Fork of the Puerco River is intermittent and retains flow only during and immediately following precipitation events. Additional regional surface water features include the Refinery evaporation ponds.

3.2 Subsurface Conditions

The shallow subsurface soils consist of fluvial and alluvial deposits comprised of clay and silt with minor inter-bedded sand layers. Very low permeability bedrock (e.g., claystones and siltstones) underlie the surface soils and effectively form an aquitard. The Chinle Group, which is Upper Triassic, crops out over a large area on the southern margin of the San Juan Basin. The uppermost recognized local Formation is the Petrified Forest Formation, and the Sonsela Sandstone Bed is the uppermost recognized regional aquifer. Aquifer test of the Sonsela Bed northeast of Prewitt indicated a transmissivity of greater than 100 ft squared per day (Stone and others, 1983). The Sonsela Sandstone's highest point occurs southeast of the site and slopes downward to the northwest as it passes under the Refinery. The Sonsela Sandstone forms a water-bearing reservoir with artesian conditions throughout the central and western portions of the Refinery property.

The diverse properties and complex irregular stratigraphy of the surface soils across the site cause a wide range of hydraulic conductivity ranging from less than 10^{-2} centimeters per second (cm/sec) for gravel like sands immediately overlying the Petrified Forest Formation to 10^{-8} cm/sec in the clay soils located near the surface (Western, 2009). Generally, shallow groundwater at the Refinery follows the upper contact of the Petrified Forest Formation with prevailing flow from the southeast to the northwest, although localized areas may have varying flow directions (Figure 3-1).



Process Sewer Investigation Work Plan

4.0 Scope of Activity

This investigation will be conducted to assess the current integrity of the process sewer lines in the vicinity of AOC 35. This section outlines the scope of activity used to identify and record potential leaks in the process sewer.

4.1 Smoke Testing Methodology

To assist in determining where line integrity issues may be present, smoke will be introduced into the process sewer system in AOC 35 from selected manhole locations with a blower. The blower is a piece of equipment designed to move large volumes of air throughout the process sewer system. Smoke testing is a common method of identifying breaks and undocumented connections in sewer systems. Smoke testing also allows for inspection of smaller connections and lines that would be inaccessible to camera scope operations. An experienced smoke testing subcontractor will be utilized to conduct testing. Smoke testing utilizes a non-toxic smoke approved by the Environmental Protection Agency for use in populated areas. A safety data sheet of the selected smoke will be reviewed prior to starting the field investigation. Figure 4-1 shows the section of process sewer where the investigation will be focused. The smoke introduction locations will be determined onsite and will be recorded in the daily field logs. Locations in AOC 35 will be monitored by a three- to five-person team for the visual presence of the smoke coming from the ground surface and/or at any openings in the process sewer system. Potential leaks are expected to present with smoke within minutes of introducing smoke into the sewer. The location of observed smoke will be flagged, marked by global positioning system (GPS), and recorded in the daily field log. A ground penetrating radar system will be used in conjunction with smoke testing to map the sewer line locations.

4.2 Documentation of Field Activities

Daily field activities, including observations and field procedures, will be recorded in a field logbook. Indelible ink will be used to record all field activities (Appendix A). Photographic documentation of field activities will be performed, as appropriate. The daily record of field activities will include the following:

1. Date,
2. Smoke entrance GPS and descriptive locations,
3. Field investigation team members including subcontractors and visitors,
4. Weather conditions,
5. Smoke leak GPS and descriptive locations,
6. Observations, and
7. Photographic log, as appropriate



Process Sewer Investigation Work Plan

5.0 Schedule

The smoke investigation must be conducted on a clear day and will have the highest chance of success in late spring, during the dry season. Wet, icy, or snow-covered soil may block smoke from reaching the ground surface and prevent leaks from being detected therefore testing will only be conducted during a dry, clear day. The investigation will be conducted in the spring of 2024, pending NMED approval of this Work Plan. An investigation report, presenting the findings of the investigation, will be submitted to NMED no later than 150 days after the conclusion of the field investigation. Data presented in the investigation report will include extent of smoke testing was performed, where smoke was observed outside of the system (if applicable), copies of daily field logs, and photographs. A comprehensive map of the AOC 35 sewer system and any repairs needed, if required, will be created based on the data collected. Recommendations will be made based on the investigation findings will also be presented.



Process Sewer Investigation Work Plan

6.0 References

- New Mexico Environment Department (NMED). 2022. Approval with Modifications Revised Investigation Work Plan No. 2 Area of Concern 35, Western Refining Southwest Inc., Gallup Refinery, McKinley County, Gallup, New Mexico, EPA ID # NMD000333211, HWB-WRG-20-009. December 12.
- Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizel, N.H., and Padgett, E.T. 1983. Hydrogeology and Water Resources of San Juan Basin, New Mexico; Hydrogeologic Report 6, New Mexico Bureau of Mines and Mineral Resources, p. 70.
- Western Refining. Southwest Inc., Gallup Refinery (Western). 2009. Facility Wide Groundwater Monitoring Work Plan. Western Refining Company, Southwest, Inc., Gallup Refinery, EPA ID # NMD000333211, HWB-GRCC-09-001. February 9.
- Western. 2016. Interim Measures Report Hydrocarbon Seep Area. Western Refining Southwest Inc, Gallup Refinery, EPA ID # NMD000333211, HWB-WRG-15-002. July 28.



Process Sewer Investigation Work Plan

Figures

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Image Cite: U.S. Geological Survey, 1:24,000--Scale 7.5 Minute Digital Raster Graphic Quadrangle, McKinley County, Publication: 2004



- NOTES:**
1. SITE LEGAL DESCRIPTION - TOWNSHIP 15 NORTH, RANGE 15 WEST, SECTION 33
 2. AOC = AREA OF CONCERN

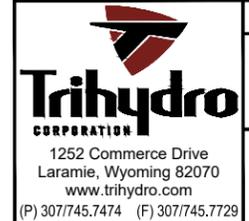
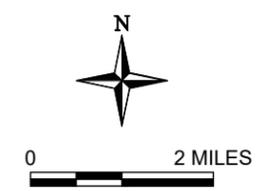


FIGURE 1-1

SITE LOCATION MAP
PROCESS SEWER INVESTIGATION WORK PLAN

WESTERN REFINING SOUTHWEST LLC
D/B/A MARATHON GALLUP REFINERY
GALLUP, NEW MEXICO

Drawn By: REP	Checked By: JP	Scale: 1" = 2 MILES	Date: 2/1/2023	File: 697-GALLUPAOC35-SITELOC
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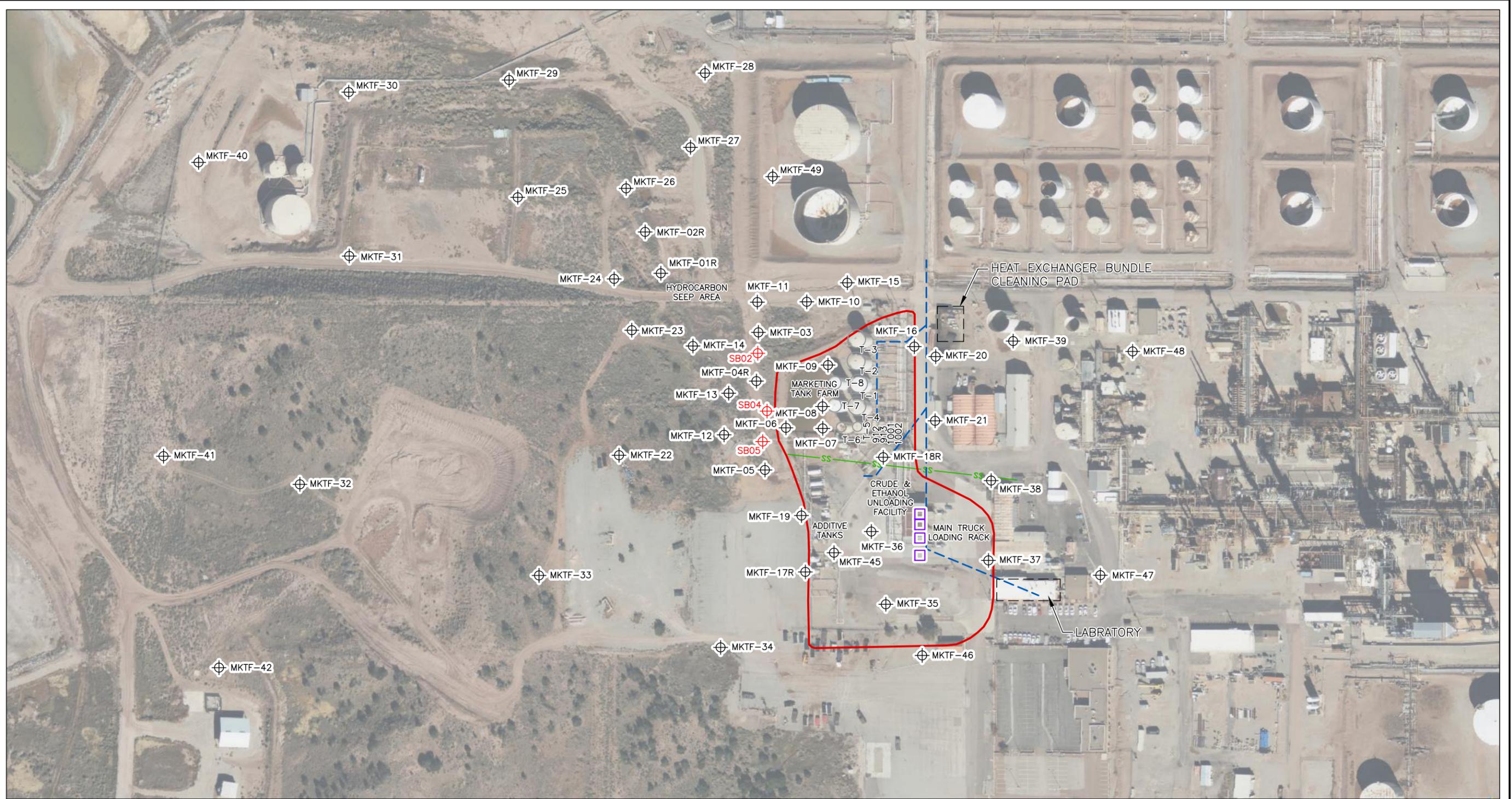
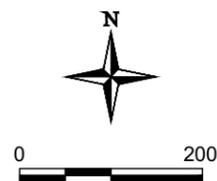


Image Cite: DigitalGlobe © CNES (2022) Distribution Airbus DS © Microsoft Corporation, BING Imagery

EXPLANATION	
⊕ MKTF-42	EXISTING MONITORING WELL AND DESIGNATION
⊕ SB04	TEMPORARY MONITORING WELL AND DESIGNATION
□	EXISTING SUMP LOCATION
— (Red line)	AOC 35 BOUNDARY
- - - (Blue line)	PROCESS SEWER LINE
- - - (Green line with SS)	SANITARY SEWER LINE
AOC	AREA OF CONCERN



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FIGURE 1-2
AOC 35 MAP
AND PROCESS SEWER LINES, PROCESS SEWER INVESTIGATION WORK PLAN
WESTERN REFINING SOUTHWEST LLC
D/B/A MARATHON GALLUP REFINERY
GALLUP, NEW MEXICO

Drawn By: PME | Checked By: BB | Scale: 1" = 200' | Date: 3/24/2023 | File: 697-AOC35-PSI-SITEMAP

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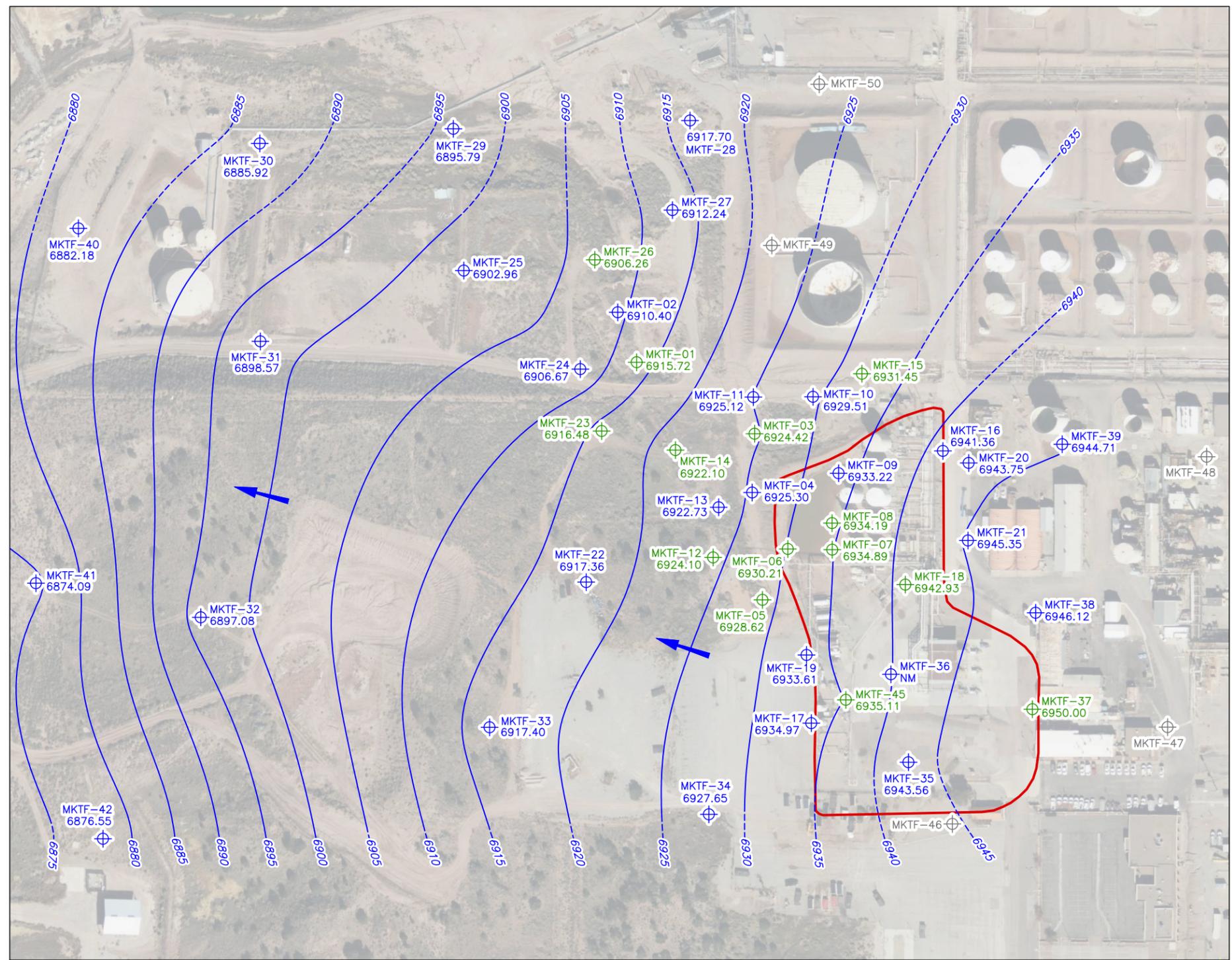
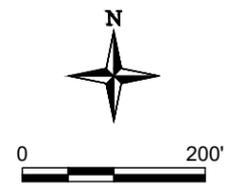


Image Cite: DigitalGlobe © CNES (2022) Distribution Airbus DS © Microsoft Corporation, BING Imagery

EXPLANATION

	MKTF-39 6944.71	CHINLE/ALLUVIUM INTERFACE WELL AND DESIGNATION (SHOWING GROUNDWATER ELEVATION IN FT AMSL)
	MKTF-15 6931.45	MONITORING WELL WITH SPH AND DESIGNATION (SHOWING GROUNDWATER ELEVATION IN FT AMSL)
	MKTF-48	MONITORING WELL AND DESIGNATION (NON-EXIST THIRD QUARTER 2019)
	6940	LINE OF EQUAL GROUNDWATER ELEVATION IN FT AMSL, DASHED WHERE INFERRED (APPROXIMATE) UPPER WATER-BEARING ZONE
		GROUNDWATER FLOW DIRECTION
		AOC 35 BOUNDARY
AOC		AREA OF CONCERN
FT AMSL		FEET ABOVE MEAN SEA LEVEL
NM		NOT MEASURED
SPH		SEPARATE-PHASE HYDROCARBON



<p>Trihydro CORPORATION</p> <p>1252 Commerce Drive Laramie, Wyoming 82070 www.trihydro.com (P) 307/745.7474 (F) 307/745.7729</p>	FIGURE 3-1	
	POTENTIOMETRIC SURFACE MAP (AUGUST 2019) PROCESS SEWER INVESTIGATION WORK PLAN WESTERN REFINING SOUTHWEST, LLC D/B/A MARATHON GALLUP REFINERY GALLUP, NEW MEXICO	
Drawn By: PME	Checked By: BB	Scale: 1" = 200'
Date: 3/3/2023	File: 697-AOC35-PSI-PS-Q3_2019	

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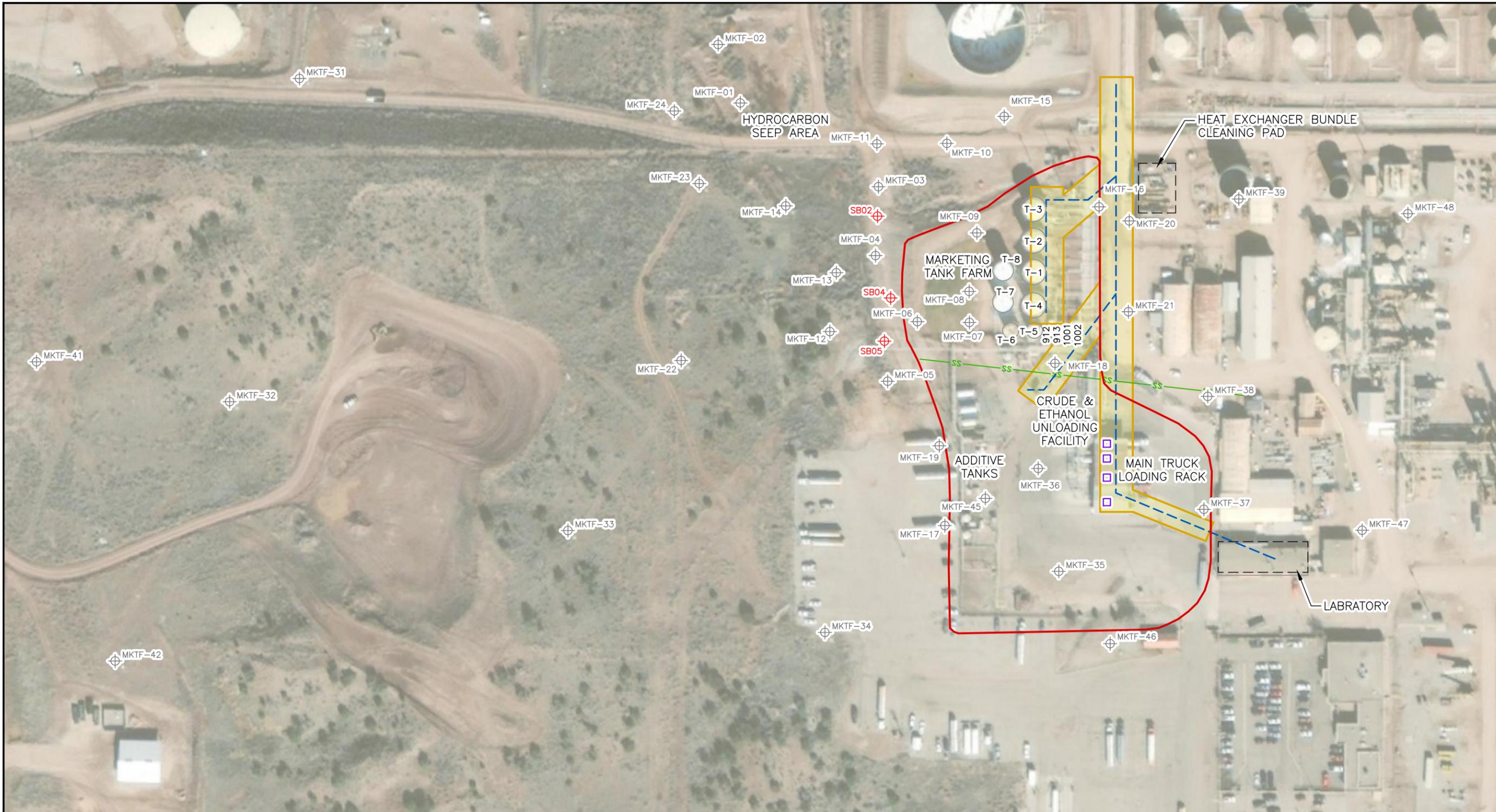
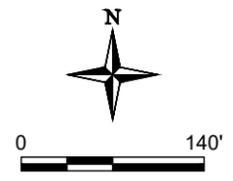


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EXPLANATION	
	EXISTING MONITORING WELL AND DESIGNATION
	TEMPORARY MONITORING WELL AND DESIGNATION
	EXISTING SUMP LOCATION
	AOC 35 BOUNDARY
	PROCESS SEWER LINE
	SANITARY SEWER LINE
	PROCESS SEWER INVESTIGATION AREA
	AREA OF CONCERN



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FIGURE 4-1

PROPOSED INVESTIGATION AREA, PROCESS SEWER INVESTIGATION WORK PLAN

**WESTERN REFINING SOUTHWEST LLC
D/B/A MARATHON GALLUP REFINERY
GALLUP, NEW MEXICO**

Drawn By: PME	Checked By: BB	Scale: 1" = 140'	Date: 3/24/2023	File: 697-AOC35-PSI-PIA
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Process Sewer Investigation Work Plan

Appendix A - Example Smoke Testing Log



Smoke Testing Log

Sheet 1 of ____

Project Name		Project Number	Smoke Test ID
Smoke Testing Company	Smoke Testing Staff		
Blower Model	Smoke Type	Date/Time Smoke Test Started	Date/Time Stopped
Smoke Entrance Location Description (include sketch in field map)		Trihydro Field Staff	
Smoke Entrance GPS Location		Weather Conditions	
Smoke Detection Results			
1)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
2)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
3)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
4)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
5)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
6)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		

Smoke Testing Log

Sheet 2 of ____

Project Name		Project Number	Smoke Test ID
Smoke Detection Results			
7)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
8)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
9)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
10)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
11)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
12)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
13)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		
14)	Time:		
	GPS Location:		
	Location Description:		
	Notes:		

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
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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 202656

CONDITIONS

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 202656
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
scwells	Accepted for Record Retention Purposes Only	3/31/2023