

August 1, 2024

Mr. Gerry Razaros, Director (Acting)
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Response to July 11, 2024 Letter "Determination of Administratively Complete Stage 2
Abatement Plan for the Former Reverse Osmosis Reject Discharge Fields, incident
#nRM2022559242, GW-028"
HF Sinclair Navajo Refining LLC, Artesia Refinery

Dear Mr. Razaros:

HF Sinclair Navajo Refining LLC (HFSNR) is submitting the enclosed information required as a condition of the approval provided in the July 11, 2024 referenced above regarding the Former Reverse Osmosis (RO) Reject Discharge Fields (RO fields). The list of information required to be submitted within 30 days of that letter is listed in the following bullets, with responses in italics.

1. An up-to-date executive summary of data from quarterly sampling events or any other activity associated with this specific abatement plan.

One conclusion of the Stage 1 AP was to continue semiannual gauging and sampling of the wells associated with the RO Fields. The wells specifically associated with the RO Fields have been included in the facility-wide groundwater monitoring program since the Stage 1 AP was submitted. However, quarterly sampling has not been performed within the RO Fields since the completion of the Stage 1 AP. No other activities recommended in the Stage 1 AP have been implemented because HF Sinclair was waiting for approval from OCD.

Quarterly reports will be submitted as part of the Stage 2 AP, beginning in October 2024. The October 2024 report will describe activities related to this Stage 2 AP during the previous three months (July to September 2024). Each quarterly report will be submitted no later than the 30<sup>th</sup> of the month following each quarter.

2. A current and up-to-date site map showing monitoring wells and any pertinent remedial data

The Stage 1 AP recommended installation of two additional downgradient monitoring wells. HF Sinclair has not yet installed these two wells while waiting for approval from OCD. The two additional monitoring wells are scheduled to be installed during August 2024. An updated map showing the locations of the monitoring wells associated with the RO Fields will be submitted as

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part of the October 2024 quarterly report. In addition, an updated map will be provided in the October 2024 showing the locations of soil samples collected as per the Stage 2 AP.

3. Any quarterly monitoring collected to the present

Quarterly monitoring data that was collected as part of the Stage 1 AP was submitted with the final Stage 1 AP report (2020). Semiannual facility-wide groundwater monitoring data, which includes the RO Fields, is submitted annually in February of each year and contains a 3-year window of data. The action ID #s for the upload of the 2023 discharge permit report (which includes the 2023 annul groundwater report) are 353310 and 353478.

If you have any questions, please feel free to contact Teresa Alba at 575-746-5391 or Mike Holder at 575-308-1115.

Sincerely,

Case Hinkins

**Environmental Manager** 

HF Sinclair Navajo Refining LLC

enclosures

c: OCD: M. Buchanan, L. Barr

HFSNR: M. Holder, T.Alba

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

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 369502

## **CONDITIONS**

Operator:	OGRID:
HF Sinclair Navajo Refining LLC ATTN: GENERAL COUNSEL	15694
	Action Number:
Dallas, TX 75201	369502
	Action Type:
	[UF-GWA] Ground Water Abatement (GROUND WATER ABATEMENT)

## CONDITIONS

Created By	Condition	Condition Date
michael.buchanar	Accepted for the record, HFNR letter response to COAs in ST2 AP for the RO discharge fields.	8/7/2024