



Michelle Lujan Grisham
Governor

Howie C. Morales
Lt. Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313
Phone (505) 476-6000 Fax (505) 476-6030

www.env.nm.gov

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

December 15, 2020

Mr. Scott M. Denton
Environmental Manager
HollyFrontier Navajo Refining LLC
P.O. Box 159
Artesia, New Mexico 88211-0159

**RE: APPROVAL WITH MODIFICATIONS
2020 FACILITY-WIDE GROUNDWATER
MONITORING WORK PLAN, JUNE 2020
HOLLYFRONTIER NAVAJO REFINING LLC - ARTESIA REFINERY
EPA ID NO. NMD048918817
HWB-NRC-20-005**

Dear Mr. Denton:

The New Mexico Environment Department (NMED) has completed its review of the HollyFrontier Navajo Refining LLC's, Artesia Refinery (the Permittee) *2020 Facility-Wide Groundwater Monitoring Work Plan (2020 FWGMWP)*, dated June 30, 2020. NMED hereby issues this Approval with modifications.

The Permittee must address all comments in this Approval with Modifications and address comments, as applicable, in the annual groundwater monitoring report.

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. Denton
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If you have any questions regarding this letter, please contact Leona Tsinnajinnie of my staff at (505) 476-6057.

Sincerely,

Kevin M. Pierard, Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
L. Tsinnajinnie, NMED HWB
M. Suzuki, NMED HWB
C. Chavez, NMEMNRD OCD
R. Combs, HollyFrontier Navajo Refining LLC, Artesia Refinery
L. King, EPA Region 6 (6LCRRC)

File: Reading File and NRC 2020, HWB-NRC-20-005

Attachment

Mr. Denton
December 15, 2020
Attachment Page 1 of 1

Comment 1

In Section 5.0 (Monitoring Program Scope of Services), page 17, paragraph 1, the Permittee proposes to reduce the sampling frequency for volatile organic compounds (VOCs) from semi-annual to annual for the following Evaporation Pond monitoring wells: MW-2A, MW-3, MW-4A, MW-5A, MW-10, MW-18A, MW-22A, MW-70, MW-74, MW-75, MW-76, MW-79, MW-83, MW-84, MW-87, MW-88, MW-121, MW-122, MW-123, MW-124, OCD-1R, OCD-2, OCD-3, OCD-4, OCD-5, OCD-6, OCD-7AR, and OCD-8A. After reviewing the analytical data from the annual reports, NMED has determined that the VOC sampling frequency may be reduced from semi-annual to annual. However, if future analytical data reports exceedances for two consecutive sampling events, the Permittee must resume semi-annually sampling for VOCs. NMED will reevaluate the need for continued semi-annual sampling based on the data. The Permittee must continue semi-annual testing for total petroleum hydrocarbons (TPH) at the Evaporation Ponds.

Comment 2

In Section 5.0 (Monitoring Program Scope of Services), page 17, paragraph 1, the Permittee proposes to remove the following monitoring wells from the gauging schedule in the facility-wide groundwater monitoring activities: KWB-1B, MW-9, MW-19, and MW-30. NMED has determined the following:

- a. Monitoring well KWB-1B is located in the middle of the agriculture field and has similar well information as monitoring well KWB-1A. Both wells are screened at the same depth and closely located. However, there is a significant difference in the well gauging data. Monitoring at KWB-1B must remain on the gauging schedule but the frequency may be reduced from semi-annual to annual measurements.
- b. Monitoring well MW-9 is located north of the Pecan Orchard near Three Mile Ditch (TMD). Nearby monitoring wells are MW-8 and MW-21, but only MW-21 has a reported screened interval. There is no screened interval data available for MW-9. Based on the location, MW-9 may need to be utilized for modeling the effects of the injection/extraction system. MW-9 must remain on the gauging schedule and must continue to be measured semi-annually.
- c. Monitoring well MW-19 is located at the northeastern boundary of the Refinery near monitoring wells MW-53 and NCL-31. Based on the screened interval data and the gauging data, MW-19 must remain in the gauging schedule, but the frequency may be reduced from semi-annual to annual measurements.
- d. Monitoring well MW-30 is located near Eagle Draw and northeast of the South RO Reject Area. This monitoring well does not have screened interval data and there is variability with the gauging data from nearby wells. MW-30 must remain on the gauging schedule and must continue to be measured semi-annually.

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

COMMENTS

Action 19522

COMMENTS

Operator: NAVAJO REFINING COMPANY LLC TX752016927	100 Crescent Court, Suite 1600 Dallas,	OGRID: 255554	Action Number: 19522	Action Type: DISCHARGE PERMIT
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Created By	Comment	Comment Date
cchavez	HWB 2020 NRC FWGWMWP Approval w Mod 12-15-2020.	03/02/2021

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CONDITIONS

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CONDITIONS OF APPROVAL

Operator: NAVAJO REFINING COMPANY LLC TX752016927			100 Crescent Court, Suite 1600 Dallas,		OGRID: 255554	Action Number: 19522	Action Type: DISCHARGE PERMIT
OCD Reviewer cchavez					Condition None		