



Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39
Jamestown, NM 87347

August 3, 2021

DRAFT FOR REVIEW

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

**RE: Request for Work Plan Modifications
Investigation Work Plan No. 2 – Area of Concern 35
Western Refining Southwest LLC (dba Marathon Gallup Refinery)
EPA ID# NMD000333211
HWB-WRG-16-001**

Dear Mr. Pierard:

Western Refining Southwest LLC (dba Marathon Gallup Refinery) (Refinery) is requesting to further modify the approved work plan *Investigation Work Plan No. 2, Area of Concern 35* (Work Plan) based on the recent Laser Induced Fluorescence/Hydraulic Profiling (LIF/HP) work performed in and around Area of Concern 35 (AOC-35).

A timeline of the Work Plan development is presented below:

- Investigation Work Plan, submitted August 2018
- Disapproval, received January 31, 2019
- Response to Disapproval, submitted July 26, 2019
- Approval with Modifications, received September 12, 2019

Following the September 2019 approval with modifications, a leak was discovered within AOC-35 in the pipeline just north of the truck loading rack. The Refinery proposed modifying the existing Work Plan based on the location of the discovered leak. The timeline for the revised Work Plan is as follows:

- Revised Investigation Work Plan, submitted February 27, 2020
- Disapproval, received August 31, 2020
- Response to Disapproval, submitted January 4, 2021
- Approval with Modifications, received February 11, 2021
- Response to Approval with Modifications, submitted April 14, 2021

The defined goal of the approved investigation Work Plan is as follows:

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“The site investigation of soil and groundwater will be conducted to characterize the subsurface conditions in the area of the leaking underground transfer line on the north side of the Truck loading rack and help delineate the down-gradient migration of SPH to the west of the Truck loading rack.”

Since conception of the Work Plan additional investigative work relevant to the Work Plan scope has been performed within and around AOC-35. Specifically, the Refinery conducted LIF/HP investigations in November 2019, February 2021, and May 2021 within and hydraulically down gradient of AOC-35. A report pertaining to the November 2019 and February 2021 LIF/HP results was submitted to NMED on March 31, 2021. In addition, the Refinery is currently preparing a LIF/HP report for the remaining data outside of AOC-35 that was not discussed in the March 31, 2021 report.

The Refinery is seeking to modify the approved investigation Work Plan to harmonize the proposed soil investigation/well installation with the LIF/HP results to bolster the understanding of subsurface conditions in the area and correlate the analytical results with the LIF/HP results. The Refinery is seeking to adjust the due date of the investigation report from the verbally agreed to date of September 30, 2021 to December 31, 2021. Upon approval of this request the Refinery will submit a modified Work Plan to NMED for approval on or before August 27, 2021.

If there are any questions, please call Mr. John Moore at (505) 879-7643.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or 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*Ruth A. Cade*Ruth Cade
Vice-President

[697-082-002]



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cc: D. Cobrain, NMED HWB
M. Suzuki, NMED HWB
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G. McCartney, Marathon Petroleum Corporation
K. Luka, Marathon Petroleum Corporation
J. Moore, Marathon Gallup Refinery
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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CONDITIONS
 Action 39704

CONDITIONS

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 39704
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

CONDITIONS

Created By	Condition	Condition Date
scwells	Accepted for Record Retention Purposes-Only	11/22/2022