**Western Refining Southwest LLC**
A subsidiary of Marathon Petroleum Corporation
I-40 Exit 39
Jamestown, NM 87347

March 1, 2024

Mr. Ricardo Maestas, Acting Chief
New Mexico Environment Department, Hazardous Waste Bureau
2905 Rodeo Park Drive East, Bldg. 1
Santa Fe, NM 87505-6313

**RE: Response to Approval with Modifications**
**Hydrocarbon Seep Interim Measures 2023 First Quarter Status Report**
**Western Refining Southwest LLC, Gallup Refinery**
**McKinley County, Gallup, New Mexico**
**EPA ID# NMD000333211**
**HWB-WRG-23-017**

Dear Mr. Maestas:

Please find enclosed the response to comments from the New Mexico Environment Department (NMED) Approval with Modifications letter dated January 23, 2024, for the Hydrocarbon Seep Interim Measures 2023 First Quarter Status Report (1st Quarter 2023 Seep Report). A timeline of the Work Plan is provided below:

- 1st Quarter 2023 Seep Report, submitted to NMED on April 30, 2023
- Approval with Modifications, received from NMED dated January 23, 2024

If you have any questions or comments regarding the information contained herein, please do not hesitate to contact 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
M. Suzuki, NMED HWB
K. Luka, MPC
J. Moore, MPC
L. Tsinnajinnie, NMED HWB
N. Dhawan, NMED HWB
L. King, EPA Region 6
H. Jones, Trihydro Corporation

# ATTACHMENT A

# RESPONSE TO COMMENTS

**New Mexico Environment Department (NMED) to Western Refining Southwest LLC (dba Marathon Gallup Refinery [Refinery]) Comment Letter "Approval with Modifications Hydrocarbon Seep Interim Measures 2023 First Quarter Status Report" (January 23, 2024)**

| NMED Comment | Refinery Response |
|---|---|
| **Comment 1:** | **Response 1:** |
| In the *Borrow Pit Activities* section, page 2, the Permittee states, "[f]luid recovery from the sumps transitioned from vacuum truck recovery to recovery using the groundwater system." The Permittee must address the following in a response letter:<br>a) Provide a discussion that evaluates the efficacy of the two fluid recovery methods (i.e., vacuum truck recovery vs. recovery using the groundwater extraction system).<br>b) If the current groundwater extraction system is performing inferior to the vacuum truck recovery, propose to modify the system to achieve better efficacy.<br>c) Vacuum truck recovery provides dual phase extraction of both soil gas and groundwater. The recovery of soil gas may be a significant part of hydrocarbon removal although hydrocarbons extracted as vapor phase are not quantified during the recovery operations. Explain whether the current groundwater extraction system is also capable of providing dual phase extraction.<br>d) If the groundwater extraction system is not capable of providing dual phase extraction, propose to modify the system to be able to provide dual phase extraction or explain why dual phase extraction is not required. | a) In 2022, vacuum truck operations in the Borrow Pit took place once a day, four days a week, weather allowing. The groundwater recovery system operates continuously and removes one well casing volume approximately 24 times a day, every day, regardless of inclement weather. On average in 2022, the vacuum truck removed 80 gallons of separate phase hydrocarbons (SPH) and 680 gallons of water per month. On average in 2023, the groundwater recovery system removed 900 gallons of SPH and 2,400 gallons of water per month. On average, the groundwater recovery system removed 820 more gallons of SPH monthly compared to the vacuum truck demonstrating its effectiveness. Neither recovery method recovers soil vapors.<br>b) The Refinery will continue to use the groundwater extraction system because it is removing more SPH and total fluids than vacuum truck operations.<br>c) The groundwater extraction system is not capable of providing dual phase extraction. However, the Refinery's vacuum truck operations are also not capable of soil gas recovery as indicated by NMED. The Refinery's current and past vacuum truck operations have only been capable of removing total fluids. The groundwater extraction system only removes total fluids and is not capable of dual phase extraction. The Refinery is evaluating groundwater plume recovery alternatives to best control and recover impacts from the groundwater plume.<br>d) Dual phase extraction is being evaluated as an option for plume control with site wide groundwater remediation options. Source control is the primary objective before beginning dual phase extraction remediation. |

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**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 319234

## CONDITIONS

| | |
|---|---|
| Operator:<br>Western Refining Southwest LLC<br>539 South Main Street<br>Findlay, OH 45840 | OGRID:<br>267595 |
| | Action Number:<br>319234 |
| | Action Type:<br>[UF-DP] Discharge Permit (DISCHARGE PERMIT) |

**CONDITIONS**

| Created By | Condition | Condition Date |
|---|---|---|
| joel.stone | Approved for OCD record retention purposes. | 8/16/2024 |