



## Western Refining Southwest LLC

A subsidiary of Marathon Petroleum Corporation

I-40 Exit 39  
Jamestown, NM 87347

February 21, 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: Third Response to Approval of Modifications  
2021 Annual Groundwater Monitoring Report  
Western Refining Southwest LLC, D/B/A Marathon Gallup Refinery  
EPA ID# NMD000333211, HWB-WRG-22-006**

Dear Mr. Maestas:

Please find enclosed the response to comments from the New Mexico Environment Department (NMED) Response to Approval with Modifications letter dated February 8, 2024. A timeline of the 2021 Annual Groundwater Monitoring Report (Report) is provided below:

- Report, submitted to NMED dated March 31, 2022.
- Approval with Modifications, received from NMED dated August 23, 2022.
- Response to Approval with Modifications, submitted to NMED dated December 15, 2022.
- Second Approval with Modifications, received from NMED dated July 18, 2023.
- Second Response to Approval with Modifications, submitted to NMED dated October 31, 2023.
- Third Approval with Modifications, received from NMED dated February 8, 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:	N. Dhawan, NMED HWB	K. Luka, MPC
	L. Tsinnajinnie, NMED HWB	J. Moore, MPC
	L. Andress, NMED HWB	H. Jones, Trihydro Corporation
	M. Suzuki, NMED HWB	L. King, EPA Region 6

**ATTACHMENT A**  
**RESPONSE TO COMMENTS**

**New Mexico Environment Department (NMED) to Western Refining Southwest LLC (DBA Marathon Gallup Refinery [Refinery]) Comment Letter “RE: Second Response to Approval with Modifications, 2021 Annual Groundwater Monitoring Report” (February 8, 2024)**

NMED Comments	Refinery Responses
<p><b>Comment 1:</b></p> <p>In the response to NMED’s Response Letter Comment 1, the Permittee states, “[t]he majority of the data points (126 of 192 data points) were rejected due to extremely low surrogate recoveries for Method 8270 analyses and primarily affected the acid extractable surrogates. The related target compounds are the phenolic compounds.” The newer version of Method 8270 allows for the use of selected ion monitoring (SIM), which can potentially eliminate some adverse effects on surrogate recovery and lower detection limits. Discuss whether the use of Method 8270 SIM can reduce the number of data rejection in a response letter. Based on the conclusions of the discussion, the Permittee may propose to use Method 8270 SIM in lieu of Method 8270 for the selected compounds in the upcoming Facility-wide Groundwater Monitoring Work Plan update, as applicable.</p>	<p><b>Response 1:</b></p> <p>All rejected data was on non-detect results. The Refinery agrees that using Method 8270 SIM may reduce the number of rejected analytes due to the lower detection limits by reducing the potential for non-detect results and therefore rejected data. However, Method 8270 SIM does not eliminate the possibility of matrix interference and low surrogate recovery resulting in rejected data. In 2023, The Refinery used Method 8270 SIM for the following analytes:</p> <ul style="list-style-type: none"> <li>• Naphthalene</li> <li>• 1,4-Dioxane</li> <li>• 1-Methylnaphthalene</li> <li>• 2-Methylnaphthalene</li> <li>• Acenaphthene</li> <li>• Anthracene</li> <li>• Benzo(a)anthracene</li> <li>• Benzo(b)fluoranthene</li> <li>• Chrysene</li> <li>• Fluoranthene</li> <li>• Fluorene</li> <li>• Indeno(1,2,3-cd)pyrene</li> <li>• Naphthalene</li> <li>• Phenanthrene</li> <li>• Pyrene</li> </ul> <p>The Refinery will continue to use Method 8270 SIM on these analytes for the 2024 sampling. According to discussions with Eurofins Albuquerque, Method 8270 SIM cannot be used on additional analytes at this time due to lab limitations.</p>

**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**

CONDITIONS

Action 319232

**CONDITIONS**

Operator: Western Refining Southwest LLC 539 South Main Street Findlay, OH 45840	OGRID: 267595
	Action Number: 319232
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

**CONDITIONS**

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