

AP - 110

**COVID-19
PANDEMIC**

2020

From: [Chavez, Carl J. EMNRD](#)
To: [Denton, Scott](#); [Wade, Gabriel. EMNRD](#); [Cobrain, Dave. NMENV](#); [Tsinnajinnie, Leona. NMENV](#)
Cc: [Combs, Robert](#); [Leik, Jason](#); [Griswold, Jim. EMNRD](#)
Bcc: [Sandoval, Adrienne. EMNRD](#); [Brancard, Bill. EMNRD](#)
Subject: RE: HFNR Semi-annual GW Monitoring Delay Request
Date: Wednesday, April 8, 2020 10:42:00 AM

Scott, et al.:

Approved.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
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“Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?” (To see how, go to: <http://www.emnrd.state.nm.us/OCD> and see “Publications”)

From: Denton, Scott <Scott.Denton@HollyFrontier.com>
Sent: Tuesday, April 7, 2020 4:57 PM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>; Wade, Gabriel, EMNRD <Gabriel.Wade@state.nm.us>; Cobrain, Dave, NMENV <dave.cobrain@state.nm.us>; Tsinnajinnie, Leona, NMENV <Leona.Tsinnajinnie@state.nm.us>
Cc: Denton, Scott <Scott.Denton@HollyFrontier.com>; Combs, Robert <Robert.Combs@HollyFrontier.com>; Leik, Jason <Jason.Leik@HollyFrontier.com>
Subject: [EXT] HFNR Semi-annual GW Monitoring Delay Request

Mr. Carl Chavez
Mr. Gabriel Wade

Mr. Dave Cobrain
Ms. Leona Tsinnajinnie

Request for 60 day delay of Groundwater Sampling at Navajo and Lovington Refineries.

HollyFrontier Navajo Refining (HFNR) conducts groundwater sampling on a semi-annual basis in accordance with the Facility-Wide Groundwater Monitoring Work Plan (FWGMWP) for the Artesia refinery (required by RCRA Permit No. NMD048918817 and OCD Discharge Permit GW-028), and OCD AP-110 for the Lovington refinery. The first sampling event for 2020 is currently scheduled for the week of April 13, 2020 for both facilities.

On March 11, 2020, Governor Michelle Lujan Grisham declared a public health emergency, and through the Department of Health Services has issued several subsequent Public Health Orders. On April 6, 2020, the public health emergency declaration was renewed and extended through April 30, 2020. A Public Health Order issued 3-23-2020 and amended on April 6, 2020 directs all non-essential businesses in New Mexico to close, and for essential businesses in New Mexico to minimize operations and staff to the greatest extent practical. Since this declaration, The Governor has also issued travel restrictions related to air travel for travelers coming to New Mexico from out of state, requiring a 14 day waiting period, and restrictions related to lodging (hotels limited to 25% occupancy beginning April 7). The travel restriction orders do not currently prevent HFNR's contractor from traveling to the site by vehicles(although guidelines suggest that they should self-isolate for 14 days upon entry to New Mexico), but the lodging restrictions may have an impact on the availability of accommodations. It is also possible that additional travel restrictions will be made which would impact our contractor's ability to reach the facility or to return home after the sampling is complete.

Refinery operations are considered to be an essential business as defined in the current Public Health Order. However, the subcontractor that normally performs sampling at the Artesia and Lovington refineries is based in Houston, Texas, and would be sending a team of 9 members to perform sampling at Artesia and Lovington over a 5 day period. HFNR has been weighing manpower options for an acceptable approach to comply with the health orders while meeting the requirements of our RCRA and Discharge Permits. In this evaluation, local contractors and/or HFNR employees would be trained to perform the sampling. HFNR is concerned about the quality of data that would be collected under this approach and how comparable it would be to other monitoring events.

Based on review of historical data, HFNR believes a representative sampling event could be performed by our Houston-based contractor with a 60 day delay without causing any significant data quality impact due to irrigation activities in the region. Any anomalous data obtained or other exceptions to the work plan would be discussed in the Annual Groundwater Monitoring report, as prescribed in the FWGWMP.

In order to minimize threat to worker health and minimize the potential spread of COVID-19 in accordance with New Mexico directives, HFNR hereby requests postponement of the semi-annual sampling events at Artesia and Lovington for a period of 60 days. HFNR will review the circumstances after 45 days, and make a determination then if the sampling can be performed or should be cancelled based on State of New Mexico directives, risk to workers, and hydrogeologic conditions.

In the interim, HFNR will collect groundwater elevation data from the east side of the Artesia refinery, and will continue to operate the groundwater and LNAPL recovery systems using local personnel.

Please don't hesitate to contact me if you have any questions related to this request.

I hope you are all Safe and Healthy!

Regards,

SMD

Scott M. Denton
Environmental Manager

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