

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kevin Adams Title: Senior Manager, Environmental

Signature:  Date: 3/8/2023

email: Kevin.Adams@Delekus.com Telephone: 409-553-1480

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Jennifer Nobui Date: 03/09/2023

Printed Name: Jennifer Nobui Title: Environmental Specialist A



Delek Logistics, LLC

January 26, 2023

Mike Bratcher  
Incidents Manager  
NMOCD District 2  
811 South First Street  
Artesia, NM 88210

VIA: OCD Permitting Fee Portal

Re: Libby Oil Terminal Fire Closure Report  
Formerly Operated by 3Bear Field Services LLC  
OGRID: 372603  
Incident Number: nAPP2220760390

Dear Mr. Bratcher,

As discussed on Thursday September 1, 2022, this summary report is being sent with relevant details to close your file subsequent to acquisition from 3Bear by Delek Logistics, LLC (Delek). The fire happened on July 16, 2022 at the 3Bear Libby Oil Terminal. Due to the transition from 3Bear to Delek and the fact that there was no surface environmental impact by hydrocarbons, an extension request was previously submitted. We are hopeful that this brief report with attachments will justify closure.

You communicated that there is no need to complete a full-blown investigation pursuant to NMAC Title 19 – Natural Resources and Wildlife, Chapter 15 Oil and Gas, Part 29 Release Notification, Sections 11 and 12 (Site Assessment/Characterization, Remediation and Closure) because there was no release of hydrocarbon to the ground. However, you did request sampling and reporting of analytical results demonstrating no contamination.

Two soil samples were obtained in the vicinity of the failed pump for analysis of Total Petroleum Hydrocarbons (GRO/DRO/MRO), BTEX, and Chlorides. One sample

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Delek Logistics, LLC

was collected below equipment (SS-1) and one sample was collected below an elevated pipe with observed hydrocarbon mist residue. Attached soil analytical results indicate no BTEX above reporting limits, negligible TPH concentrations (29.7 mg/Kg TPH GRO and 30.4 mg/Kg TPH-DRO with QC Flags), and Chloride (229 mg/K) within soil sample SS-1, and no BTEX, negligible TPH-GRO (21.8 mg/Kg with a QC flag), and Chloride (59.3 mg/Kg) within soil sample SS-2. The laboratory Job Narrative noted analytical Quality-Control issues, including a method blank containing GRO above the method detection limit and surrogate recoveries outside control limits. Sample locations are depicted on the attached Figure 1 followed by photographs of the equipment fire and sampled areas on Figures 2, 3, and 4. Results are summarized below and the analytical report is attached for reference.

### Sampling Analytical Results for the Libby Oil Terminal Equipment Fire Event

Sample ID	Date Sampled	TPH (mg/Kg)				BTEX (mg/Kg)		
		TPH (C6 to C10)	TPH (>C10 to C28)	TPH (>C28 to C36)	Benzene	Toluene	Ethyl-benzene	Xylenes (total)
SS-1	11/21/2022	29.7 (J B)	30.4 (J)	<15.0 (U)	<0.000383 (U)	<0.000454 (U)	<0.000563 (U)	<0.00101 (U)
SS-2	11/21/2022	<21.8 (J B)	<15.0 (U)	<15.0 (U)	<0.000383 (U)	<0.000453 (U)	<0.000562 (U)	<0.00100 (U)

Chloride was detected at 229 mg/Kg in SS-1 and 59.3 mg/Kg within SS-2. J and B Qualifiers are summarized on the attached analytical report.

The apparent root cause of this incident was failure of bearings on Pump 2450, which lead to excessive shaft motion, likely resulting in mechanical seal damage, providing a leak path for product with a potential ignition source due to friction heat. Product continued to feed the fire even after pumps were shut down. There was no remote shutdown mechanism for tank valves, which were closed by hand.

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An investigation into the apparent root cause was undertaken and modifications have been made in an effort to prevent future incidents. The floating-roof tanks were not compromised during this incident.

This incident was reported pursuant to 19 NM Admin Code 19.15.29.10. Because the incident was a fire, it was categorized as a "Major Release"; however, the fire was extinguished prior to release of liquid hydrocarbons to the ground.

Per your direction, the C-141 Closure form is attached.

If you have any questions regarding this submittal, please contact me at (409) 553-1480 or Kevin.Adams@delekus.com.

Sincerely,

A handwritten signature in blue ink that reads "Kevin M. Adams".

Kevin Adams  
Senior Manager, Environmental  
12700 Park Central Suite 700  
Dallas, TX 75251

#### Attachments

Figure 1 – Sample Locations

Figure 2 – Equipment Fire in Progress

Figure 3 – SS-1 Location

Figure 4 – SS-2 Location

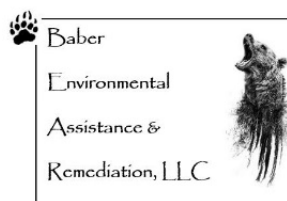
Laboratory Analytical Report

C-141 Closure Form

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**SAMPLING LOCATIONS  
LIBBY OIL TERMINAL  
EQUIPMENT FIRE**



**REPORT  
DATE:  
1/20/2023**

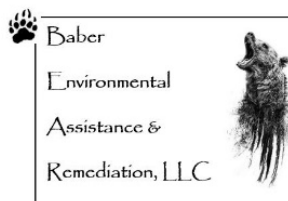
**DWG BY:  
GHD**

**DELEK OIL  
PLANT**

**FIGURE NO.:  
1**



## EQUIPMENT FIRE IN PROGRESS



REPORT  
DATE:  
1/20/2023

PHOTO BY:  
3 BEAR

DELEK OIL  
TERMINAL

FIGURE NO.:  
2



SOIL SAMPLE SS-1  
LOCATION UNDER  
EQUIPMENT SKID



Baber  
Environmental  
Assistance &  
Remediation, LLC



REPORT  
DATE:  
1/20/2023

PHOTO  
BY:  
GHD

DELEK OIL  
TERMINAL

FIGURE NO.:  
3



SOIL SAMPLE SS-2  
LOCATION UNDER  
ELEVATED PIPE



Baber  
Environmental  
Assistance &  
Remediation, LLC



REPORT  
DATE:  
1/20/2023

PHOTO  
BY:  
GHD

DELEK OIL  
TERMINAL

FIGURE NO.:  
4



Environment Testing

1

2

3

4

5

6

7

8

9

10

11

12

13

14

# ANALYTICAL REPORT

## PREPARED FOR

Attn: James (J.T.) Murrey  
GHD Services Inc.  
2135 South Loop 250 West  
Midland, Texas 79703

Generated 12/7/2022 4:39:06 PM

## JOB DESCRIPTION

Delek - Libby Oil Terminal Fire Sampling  
SDG NUMBER 12596573

## JOB NUMBER

880-21894-1

Eurofins Midland  
1211 W. Florida Ave  
Midland TX 79701

See page two for job notes and contact information.

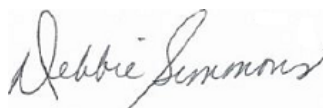
# Eurofins Midland

## Job Notes

340-009166

Analytical test results meet all requirements of the associated regulatory program (i.e., NELAC (TNI), DoD, and ISO 17025) unless otherwise noted under the individual analysis.

## Authorization



Generated  
12/7/2022 4:39:06 PM

Authorized for release by  
Debbie Simmons, Project Manager  
[Debbie.Simmons@et.eurofinsus.com](mailto:Debbie.Simmons@et.eurofinsus.com)  
(832)986-6768

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Laboratory Job ID: 880-21894-1  
SDG: 12596573

# Table of Contents

Cover Page . . . . .	1
Table of Contents . . . . .	3
Definitions/Glossary . . . . .	4
Case Narrative . . . . .	5
Client Sample Results . . . . .	6
Surrogate Summary . . . . .	8
QC Sample Results . . . . .	9
QC Association Summary . . . . .	12
Lab Chronicle . . . . .	14
Certification Summary . . . . .	15
Method Summary . . . . .	16
Sample Summary . . . . .	17
Chain of Custody . . . . .	18
Receipt Checklists . . . . .	19

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14

## Definitions/Glossary

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

## Qualifiers

## GC VOA

Qualifier	Qualifier Description
U	Indicates the analyte was analyzed for but not detected.

## GC Semi VOA

Qualifier	Qualifier Description
B	Compound was found in the blank and sample.
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
S1+	Surrogate recovery exceeds control limits, high biased.
U	Indicates the analyte was analyzed for but not detected.

## HPLC/IC

Qualifier	Qualifier Description
U	Indicates the analyte was analyzed for but not detected.

## Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
⌘	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

## Case Narrative

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

**Job ID: 880-21894-1**

**Laboratory: Eurofins Midland**

### Narrative

#### Job Narrative 880-21894-1

### Comments

No additional comments.

### Receipt

The samples were received on 11/22/2022 12:18 PM. Unless otherwise noted below, the samples arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 4.6° C.

### GC VOA

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

### GC Semi VOA

Method 8015B NM: The surrogate recovery for the blank associated with preparation batch 880-40387 and analytical batch 880-40408 was outside the upper control limits.

Method 8015B NM: Surrogate recovery for the following sample was outside control limits: SS-2 (880-21894-2). Evidence of matrix interference is present; therefore, re-extraction and/or re-analysis was not performed.

Method 8015B NM: Surrogate recovery for the following sample was outside control limits: (CCV 880-40408/32). Evidence of matrix interferences is not obvious.

Method 8015B NM: The method blank for preparation batch 880-40387 and analytical batch 880-40408 contained Gasoline Range Organics (GRO)-C6-C10 above the method detection limit. This target analyte concentration was less than the reporting limit (RL); therefore, re-extraction and/or re-analysis of samples was not performed.

Method 8015B NM: CCV inadvertently spiked twice. The data has been processed and reported.

(CCV 880-40408/21) and (CCV 880-40408/32)

No additional analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

### General Chemistry

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

### Organic Prep

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

### VOA Prep

No analytical or quality issues were noted, other than those described in the Definitions/Glossary page.

## Client Sample Results

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

Client Sample ID: SS-1

Lab Sample ID: 880-21894-1

Date Collected: 11/21/22 14:00

Matrix: Solid

Date Received: 11/22/22 12:18

## Method: SW846 8021B - Volatile Organic Compounds (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.000383	U	0.00199	0.000383	mg/Kg		11/28/22 14:35	11/29/22 17:35	1
Toluene	<0.000454	U	0.00199	0.000454	mg/Kg		11/28/22 14:35	11/29/22 17:35	1
Ethylbenzene	<0.000563	U	0.00199	0.000563	mg/Kg		11/28/22 14:35	11/29/22 17:35	1
m-Xylene & p-Xylene	<0.00101	U	0.00398	0.00101	mg/Kg		11/28/22 14:35	11/29/22 17:35	1
o-Xylene	<0.000343	U	0.00199	0.000343	mg/Kg		11/28/22 14:35	11/29/22 17:35	1
Xylenes, Total	<0.00101	U	0.00398	0.00101	mg/Kg		11/28/22 14:35	11/29/22 17:35	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	87		70 - 130	11/28/22 14:35	11/29/22 17:35	1
1,4-Difluorobenzene (Surr)	95		70 - 130	11/28/22 14:35	11/29/22 17:35	1

## Method: TAL SOP Total BTEX - Total BTEX Calculation

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total BTEX	<0.00101	U	0.00398	0.00101	mg/Kg			11/30/22 10:54	1

## Method: SW846 8015 NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total TPH	60.1		50.0	15.0	mg/Kg			11/29/22 12:08	1

## Method: SW846 8015B NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO)-C6-C10	29.7	J B	50.0	15.0	mg/Kg		11/28/22 09:07	11/29/22 00:45	1
Diesel Range Organics (Over C10-C28)	30.4	J	50.0	15.0	mg/Kg		11/28/22 09:07	11/29/22 00:45	1
Oil Range Organics (Over C28-C36)	<15.0	U	50.0	15.0	mg/Kg		11/28/22 09:07	11/29/22 00:45	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
1-Chlorooctane	116		70 - 130	11/28/22 09:07	11/29/22 00:45	1
o-Terphenyl	128		70 - 130	11/28/22 09:07	11/29/22 00:45	1

## Method: MCAWW 300.0 - Anions, Ion Chromatography - Soluble

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	229		4.95	0.391	mg/Kg			11/29/22 10:16	1

Client Sample ID: SS-2

Lab Sample ID: 880-21894-2

Date Collected: 11/21/22 14:05

Matrix: Solid

Date Received: 11/22/22 12:18

## Method: SW846 8021B - Volatile Organic Compounds (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.000383	U	0.00199	0.000383	mg/Kg		11/28/22 14:35	11/29/22 17:56	1
Toluene	<0.000453	U	0.00199	0.000453	mg/Kg		11/28/22 14:35	11/29/22 17:56	1
Ethylbenzene	<0.000562	U	0.00199	0.000562	mg/Kg		11/28/22 14:35	11/29/22 17:56	1
m-Xylene & p-Xylene	<0.00100	U	0.00398	0.00100	mg/Kg		11/28/22 14:35	11/29/22 17:56	1
o-Xylene	<0.000342	U	0.00199	0.000342	mg/Kg		11/28/22 14:35	11/29/22 17:56	1
Xylenes, Total	<0.00100	U	0.00398	0.00100	mg/Kg		11/28/22 14:35	11/29/22 17:56	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	114		70 - 130	11/28/22 14:35	11/29/22 17:56	1
1,4-Difluorobenzene (Surr)	97		70 - 130	11/28/22 14:35	11/29/22 17:56	1

Eurofins Midland

## Client Sample Results

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

Client Sample ID: SS-2

Lab Sample ID: 880-21894-2

Date Collected: 11/21/22 14:05

Matrix: Solid

Date Received: 11/22/22 12:18

## Method: TAL SOP Total BTEX - Total BTEX Calculation

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total BTEX	<0.00100	U	0.00398	0.00100	mg/Kg			11/30/22 10:54	1

## Method: SW846 8015 NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total TPH	21.8	J	49.9	15.0	mg/Kg			11/29/22 12:08	1

## Method: SW846 8015B NM - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO)-C6-C10	21.8	J B	49.9	15.0	mg/Kg		11/28/22 09:07	11/29/22 01:06	1
Diesel Range Organics (Over C10-C28)	<15.0	U	49.9	15.0	mg/Kg		11/28/22 09:07	11/29/22 01:06	1
Oil Range Organics (Over C28-C36)	<15.0	U	49.9	15.0	mg/Kg		11/28/22 09:07	11/29/22 01:06	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1-Chlorooctane	129		70 - 130				11/28/22 09:07	11/29/22 01:06	1
o-Terphenyl	141	S1+	70 - 130				11/28/22 09:07	11/29/22 01:06	1

## Method: MCAWW 300.0 - Anions, Ion Chromatography - Soluble

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	59.3		5.01	0.396	mg/Kg			11/29/22 10:24	1

## Surrogate Summary

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

### Method: 8021B - Volatile Organic Compounds (GC)

Matrix: Solid

Prep Type: Total/NA

#### Percent Surrogate Recovery (Acceptance Limits)

Lab Sample ID	Client Sample ID	BFB1 (70-130)	DFBZ1 (70-130)
880-21894-1	SS-1	87	95
880-21894-2	SS-2	114	97
LCS 880-40471/1-A	Lab Control Sample	106	109
LCSD 880-40471/2-A	Lab Control Sample Dup	93	113
MB 880-40471/5-A	Method Blank	82	104

#### Surrogate Legend

BFB = 4-Bromofluorobenzene (Surr)

DFBZ = 1,4-Difluorobenzene (Surr)

### Method: 8015B NM - Diesel Range Organics (DRO) (GC)

Matrix: Solid

Prep Type: Total/NA

#### Percent Surrogate Recovery (Acceptance Limits)

Lab Sample ID	Client Sample ID	1CO1 (70-130)	OTPH1 (70-130)
880-21894-1	SS-1	116	128
880-21894-2	SS-2	129	141 S1+
LCS 880-40387/2-A	Lab Control Sample	129	126
LCSD 880-40387/3-A	Lab Control Sample Dup	128	126
MB 880-40387/1-A	Method Blank	129	149 S1+

#### Surrogate Legend

1CO = 1-Chlorooctane

OTPH = o-Terphenyl

## QC Sample Results

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

## Method: 8021B - Volatile Organic Compounds (GC)

Lab Sample ID: MB 880-40471/5-A

Matrix: Solid

Analysis Batch: 40540

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 40471

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	<0.000385	U	0.00200	0.000385	mg/Kg		11/28/22 14:35	11/29/22 10:48	1
Toluene	<0.000456	U	0.00200	0.000456	mg/Kg		11/28/22 14:35	11/29/22 10:48	1
Ethylbenzene	<0.000565	U	0.00200	0.000565	mg/Kg		11/28/22 14:35	11/29/22 10:48	1
m-Xylene & p-Xylene	<0.00101	U	0.00400	0.00101	mg/Kg		11/28/22 14:35	11/29/22 10:48	1
o-Xylene	<0.000344	U	0.00200	0.000344	mg/Kg		11/28/22 14:35	11/29/22 10:48	1
Xylenes, Total	<0.00101	U	0.00400	0.00101	mg/Kg		11/28/22 14:35	11/29/22 10:48	1

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	82		70 - 130	11/28/22 14:35	11/29/22 10:48	1
1,4-Difluorobenzene (Surr)	104		70 - 130	11/28/22 14:35	11/29/22 10:48	1

Lab Sample ID: LCS 880-40471/1-A

Matrix: Solid

Analysis Batch: 40540

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 40471

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Benzene	0.100	0.1088		mg/Kg		109	70 - 130
Toluene	0.100	0.1011		mg/Kg		101	70 - 130
Ethylbenzene	0.100	0.1035		mg/Kg		103	70 - 130
m-Xylene & p-Xylene	0.200	0.2150		mg/Kg		108	70 - 130
o-Xylene	0.100	0.1054		mg/Kg		105	70 - 130

Surrogate	LCS %Recovery	LCS Qualifier	Limits
4-Bromofluorobenzene (Surr)	106		70 - 130
1,4-Difluorobenzene (Surr)	109		70 - 130

Lab Sample ID: LCSD 880-40471/2-A

Matrix: Solid

Analysis Batch: 40540

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 40471

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Benzene	0.100	0.1068		mg/Kg		107	70 - 130	2	35
Toluene	0.100	0.09285		mg/Kg		93	70 - 130	8	35
Ethylbenzene	0.100	0.08914		mg/Kg		89	70 - 130	15	35
m-Xylene & p-Xylene	0.200	0.1804		mg/Kg		90	70 - 130	18	35
o-Xylene	0.100	0.08869		mg/Kg		89	70 - 130	17	35

Surrogate	LCSD %Recovery	LCSD Qualifier	Limits
4-Bromofluorobenzene (Surr)	93		70 - 130
1,4-Difluorobenzene (Surr)	113		70 - 130

Eurofins Midland

## QC Sample Results

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

## Method: 8015B NM - Diesel Range Organics (DRO) (GC)

Lab Sample ID: MB 880-40387/1-A

Matrix: Solid

Analysis Batch: 40408

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 40387

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO)-C6-C10	16.04	J	50.0	15.0	mg/Kg		11/28/22 09:07	11/28/22 13:45	1
Diesel Range Organics (Over C10-C28)	<15.0	U	50.0	15.0	mg/Kg		11/28/22 09:07	11/28/22 13:45	1
Oil Range Organics (Over C28-C36)	<15.0	U	50.0	15.0	mg/Kg		11/28/22 09:07	11/28/22 13:45	1
Surrogate	MB %Recovery	MB Qualifier	Limits				Prepared	Analyzed	Dil Fac
1-Chlorooctane	129		70 - 130				11/28/22 09:07	11/28/22 13:45	1
o-Terphenyl	149	S1+	70 - 130				11/28/22 09:07	11/28/22 13:45	1

Lab Sample ID: LCS 880-40387/2-A

Matrix: Solid

Analysis Batch: 40408

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 40387

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Gasoline Range Organics (GRO)-C6-C10	1000	898.0		mg/Kg		90	70 - 130
Diesel Range Organics (Over C10-C28)	1000	950.0		mg/Kg		95	70 - 130
Surrogate	LCS %Recovery	LCS Qualifier	Limits				
1-Chlorooctane	129		70 - 130				
o-Terphenyl	126		70 - 130				

Lab Sample ID: LCSD 880-40387/3-A

Matrix: Solid

Analysis Batch: 40408

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 40387

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Gasoline Range Organics (GRO)-C6-C10	1000	990.0		mg/Kg		99	70 - 130	10	20
Diesel Range Organics (Over C10-C28)	1000	919.0		mg/Kg		92	70 - 130	3	20
Surrogate	LCSD %Recovery	LCSD Qualifier	Limits						
1-Chlorooctane	128		70 - 130						
o-Terphenyl	126		70 - 130						

## Method: 300.0 - Anions, Ion Chromatography

Lab Sample ID: MB 880-40386/1-A

Matrix: Solid

Analysis Batch: 40550

Client Sample ID: Method Blank

Prep Type: Soluble

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chloride	<0.395	U	5.00	0.395	mg/Kg			11/29/22 09:19	1

Eurofins Midland

QC Sample Results

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

Method: 300.0 - Anions, Ion Chromatography (Continued)

Lab Sample ID: LCS 880-40386/2-A

Matrix: Solid

Analysis Batch: 40550

Client Sample ID: Lab Control Sample

Prep Type: Soluble

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Chloride	250	241.4		mg/Kg		97	90 - 110

Lab Sample ID: LCSD 880-40386/3-A

Matrix: Solid

Analysis Batch: 40550

Client Sample ID: Lab Control Sample Dup

Prep Type: Soluble

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Chloride	250	242.0		mg/Kg		97	90 - 110	0	20

## QC Association Summary

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

## GC VOA

## Prep Batch: 40471

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
880-21894-1	SS-1	Total/NA	Solid	5035	
880-21894-2	SS-2	Total/NA	Solid	5035	
MB 880-40471/5-A	Method Blank	Total/NA	Solid	5035	
LCS 880-40471/1-A	Lab Control Sample	Total/NA	Solid	5035	
LCSD 880-40471/2-A	Lab Control Sample Dup	Total/NA	Solid	5035	

## Analysis Batch: 40540

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
880-21894-1	SS-1	Total/NA	Solid	8021B	40471
880-21894-2	SS-2	Total/NA	Solid	8021B	40471
MB 880-40471/5-A	Method Blank	Total/NA	Solid	8021B	40471
LCS 880-40471/1-A	Lab Control Sample	Total/NA	Solid	8021B	40471
LCSD 880-40471/2-A	Lab Control Sample Dup	Total/NA	Solid	8021B	40471

## Analysis Batch: 40679

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
880-21894-1	SS-1	Total/NA	Solid	Total BTEX	
880-21894-2	SS-2	Total/NA	Solid	Total BTEX	

## GC Semi VOA

## Prep Batch: 40387

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
880-21894-1	SS-1	Total/NA	Solid	8015NM Prep	
880-21894-2	SS-2	Total/NA	Solid	8015NM Prep	
MB 880-40387/1-A	Method Blank	Total/NA	Solid	8015NM Prep	
LCS 880-40387/2-A	Lab Control Sample	Total/NA	Solid	8015NM Prep	
LCSD 880-40387/3-A	Lab Control Sample Dup	Total/NA	Solid	8015NM Prep	

## Analysis Batch: 40408

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
880-21894-1	SS-1	Total/NA	Solid	8015B NM	40387
880-21894-2	SS-2	Total/NA	Solid	8015B NM	40387
MB 880-40387/1-A	Method Blank	Total/NA	Solid	8015B NM	40387
LCS 880-40387/2-A	Lab Control Sample	Total/NA	Solid	8015B NM	40387
LCSD 880-40387/3-A	Lab Control Sample Dup	Total/NA	Solid	8015B NM	40387

## Analysis Batch: 40604

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
880-21894-1	SS-1	Total/NA	Solid	8015 NM	
880-21894-2	SS-2	Total/NA	Solid	8015 NM	

## HPLC/IC

## Leach Batch: 40386

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
880-21894-1	SS-1	Soluble	Solid	DI Leach	
880-21894-2	SS-2	Soluble	Solid	DI Leach	
MB 880-40386/1-A	Method Blank	Soluble	Solid	DI Leach	
LCS 880-40386/2-A	Lab Control Sample	Soluble	Solid	DI Leach	
LCSD 880-40386/3-A	Lab Control Sample Dup	Soluble	Solid	DI Leach	

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## QC Association Summary

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

## HPLC/IC

## Analysis Batch: 40550

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
880-21894-1	SS-1	Soluble	Solid	300.0	40386
880-21894-2	SS-2	Soluble	Solid	300.0	40386
MB 880-40386/1-A	Method Blank	Soluble	Solid	300.0	40386
LCS 880-40386/2-A	Lab Control Sample	Soluble	Solid	300.0	40386
LCSD 880-40386/3-A	Lab Control Sample Dup	Soluble	Solid	300.0	40386

## Lab Chronicle

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

Client Sample ID: SS-1

Lab Sample ID: 880-21894-1

Date Collected: 11/21/22 14:00

Matrix: Solid

Date Received: 11/22/22 12:18

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5035			5.02 g	5 mL	40471	11/28/22 14:35	MNR	EET MID
Total/NA	Analysis	8021B		1	5 mL	5 mL	40540	11/29/22 17:35	MNR	EET MID
Total/NA	Analysis	Total BTEX		1			40679	11/30/22 10:54	SM	EET MID
Total/NA	Analysis	8015 NM		1			40604	11/29/22 12:08	SM	EET MID
Total/NA	Prep	8015NM Prep			10.00 g	10 mL	40387	11/28/22 09:07	DM	EET MID
Total/NA	Analysis	8015B NM		1	1 uL	1 uL	40408	11/29/22 00:45	SM	EET MID
Soluble	Leach	DI Leach			5.05 g	50 mL	40386	11/28/22 08:56	CH	EET MID
Soluble	Analysis	300.0		1			40550	11/29/22 10:16	SMC	EET MID

Client Sample ID: SS-2

Lab Sample ID: 880-21894-2

Date Collected: 11/21/22 14:05

Matrix: Solid

Date Received: 11/22/22 12:18

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	5035			5.03 g	5 mL	40471	11/28/22 14:35	MNR	EET MID
Total/NA	Analysis	8021B		1	5 mL	5 mL	40540	11/29/22 17:56	MNR	EET MID
Total/NA	Analysis	Total BTEX		1			40679	11/30/22 10:54	SM	EET MID
Total/NA	Analysis	8015 NM		1			40604	11/29/22 12:08	SM	EET MID
Total/NA	Prep	8015NM Prep			10.02 g	10 mL	40387	11/28/22 09:07	DM	EET MID
Total/NA	Analysis	8015B NM		1	1 uL	1 uL	40408	11/29/22 01:06	SM	EET MID
Soluble	Leach	DI Leach			4.99 g	50 mL	40386	11/28/22 08:56	CH	EET MID
Soluble	Analysis	300.0		1			40550	11/29/22 10:24	SMC	EET MID

## Laboratory References:

EET MID = Eurofins Midland, 1211 W. Florida Ave, Midland, TX 79701, TEL (432)704-5440

Eurofins Midland

Accreditation/Certification Summary

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

Laboratory: Eurofins Midland

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
Texas	NELAP	T104704400-22-24	06-30-23
The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.			
Analysis Method	Prep Method	Matrix	Analyte
8015 NM		Solid	Total TPH
Total BTEX		Solid	Total BTEX

## Method Summary

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

Method	Method Description	Protocol	Laboratory
8021B	Volatile Organic Compounds (GC)	SW846	EET MID
Total BTEX	Total BTEX Calculation	TAL SOP	EET MID
8015 NM	Diesel Range Organics (DRO) (GC)	SW846	EET MID
8015B NM	Diesel Range Organics (DRO) (GC)	SW846	EET MID
300.0	Anions, Ion Chromatography	MCAWW	EET MID
5035	Closed System Purge and Trap	SW846	EET MID
8015NM Prep	Microextraction	SW846	EET MID
DI Leach	Deionized Water Leaching Procedure	ASTM	EET MID

### Protocol References:

ASTM = ASTM International

MCAWW = "Methods For Chemical Analysis Of Water And Wastes", EPA-600/4-79-020, March 1983 And Subsequent Revisions.

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

TAL SOP = TestAmerica Laboratories, Standard Operating Procedure

### Laboratory References:

EET MID = Eurofins Midland, 1211 W. Florida Ave, Midland, TX 79701, TEL (432)704-5440

Eurofins Midland

Sample Summary

Client: GHD Services Inc.  
Project/Site: Delek - Libby Oil Terminal Fire Sampling

Job ID: 880-21894-1  
SDG: 12596573

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
880-21894-1	SS-1	Solid	11/21/22 14:00	11/22/22 12:18
880-21894-2	SS-2	Solid	11/21/22 14:05	11/22/22 12:18

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14

SSOW Pending

21894

**Eurofins Environment Testing America**

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☒ Other **NMOC**[illegible]

## Login Sample Receipt Checklist

Client: GHD Services Inc.

Job Number: 880-21894-1

SDG Number: 12596573

**Login Number: 21894****List Number: 1****Creator: Rodriguez, Leticia****List Source: Eurofins Midland**

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	

Incident ID	nAPP2220760390
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Kevin Adams Title: Senior Manager, Environmental

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

email: Kevin.Adams@Delekus.com Telephone: 409-553-1480

### OCD Only

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

**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 179835

CONDITIONS

Operator:  DKL Field Services, LLC 310 Seven Springs Way Brentwood, TN 37027	OGRID:  372603
	Action Number:  179835
	Action Type:  [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Closure Report Approved.	3/9/2023