UIC - I - <u>8 - 1</u>

ENFORCEMENT

2015 - Present

Chavez, Carl J, EMNRD

From: Denton, Scott <Scott.Denton@HollyFrontier.com>

Sent: Wednesday, April 08, 2015 3:53 PM

To: Dawson, Scott, EMNRD; Chavez, Carl J, EMNRD

Cc: Coons, Christina (Christie); O'Brien, Robert (Bob) K.; Holder, Mike

Subject:Quarterly Selenium ResultsAttachments:Rpt_1504137_Final_v1.pdf

Scott & Carl,

Attached is the laboratory report on the effluent selenium sampling conducted on April 1, 2015 and summarized below.

Total Effluent Se = 0.025 mg/L

TCLP Effluent Se = ND mg/L

Selenium sampling is conducted on a quarterly basis on the first business day of the quarter per Exhibit A Condition 1(c) to the Amended and Supplemented Order dated November 14, 2013 The next scheduled sampling date will be Wednesday, July 1, 2015. Please let me know if you have a different interpretation or if you have any questions or comments. Thanks again for your assistance in this matter.

Regards,

Scott

Scott M. Denton Environmental Manager

The HollyFrontier Companies P.O. Box 159 Artesia, NM 88211-0159 575-746-5487

Scott.Denton@HollyFrontier.com

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Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

OrderNo.: 1504137

April 08, 2015

Mike Holder Navajo Refining Company P.O. Box 159 Artesia, NM 88211-0159

TEL: (575) 748-3311

FAX

RE: Quarterly WW Effluent Monitoring

Dear Mike Holder:

Hall Environmental Analysis Laboratory received 2 sample(s) on 4/3/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

Indest

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report Lab Order 1504137

Date Reported: 4/8/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Navajo Refining Company

Client Sample ID: Effluent to Wells (location #6)

Project: Quarterly WW Effluent Monitoring Collection Date: 4/1/2015 10:30:00 AM

Lab ID: 1504137-001 Matrix: AQUEOUS Received Date: 4/3/2015 9:22:00 AM

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed	Batch ID
EPA 6010B: TOTAL METALS							Analyst: ELS	
Selenium	0.025	0.017	0.050	J	mg/L	1	4/4/2015 11:33:27 AM	18524

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- Value above quantitation range
- Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- Spike Recovery outside accepted recovery limits
- В Analyte detected in the associated Method Blank
- Η Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 1 of 3

Analytical ReportLab Order **1504137**

Hall Environmental Analysis Laboratory, Inc.

Date Reported: 4/8/2015

CLIENT: Navajo Refining Company Client Sample ID: Effluent to Wells (location #6)

Project: Quarterly WW Effluent Monitoring Collection Date: 4/1/2015 10:30:00 AM

Lab ID: 1504137-002 Matrix: AQUEOUS Received Date: 4/3/2015 9:22:00 AM

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed	Batch ID
EPA METHOD 6010B: TCLP METALS							Analyst: ELS	
Selenium	ND	0.027	0.050		mg/L	1	4/4/2015 11:34:42 AM	18524

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

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QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1504137**

08-Apr-15

Client: Navajo Refining Company

Project: Quarterly WW Effluent Monitoring

Sample ID MB-18524 SampType: MBLK TestCode: EPA 6010B: Total Metals

Client ID: PBW Batch ID: 18524 RunNo: 25294

Prep Date: 4/3/2015 Analysis Date: 4/4/2015 SeqNo: 747889 Units: mg/L

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Selenium ND 0.050

Sample ID LCS-18524 SampType: LCS TestCode: EPA 6010B: Total Metals

Client ID: LCSW Batch ID: 18524 RunNo: 25294

Prep Date: 4/3/2015 Analysis Date: 4/4/2015 SeqNo: 747890 Units: mg/L

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Selenium 0.50 0.050 0.5000 0 100 80 120

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH Not In Range
- RL Reporting Detection Limit

Page 3 of 3



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Sample Log-In Check List

NAVAJO REFINING CO Client Name: Work Order Number: 1504137 RcptNo: 1 Received by/date: Lindsay/Mangin Logged By: 4/3/2015 9:22:00 AM Completed By: 4/3/2015 9:51:32 AM Lindsay Mangin Reviewed By: Chain of Custody Yes V No 🗌 Not Present 1. Custody seals intact on sample bottles? No 🗌 Yes V Not Present 2. Is Chain of Custody complete? 3. How was the sample delivered? Courier Log In No 🗌 NA 🗌 4. Was an attempt made to cool the samples? Yes 🗸 NA 🗌 Yes No V Were all samples received at a temperature of >0° C to 6.0°C Approved by client. Sample(s) in proper container(s)? Yes V No L 7. Sufficient sample volume for indicated test(s)? No Yes V No 8. Are samples (except VOA and ONG) properly preserved? 9. Was preservative added to bottles? Yes No V NA 10. VOA vials have zero headspace? Yes No . No VOA Vials V Yes No V 11. Were any sample containers received broken? # of preserved bottles checked for pH: No L 12. Does paperwork match bottle labels? >12 unless noted) (Note discrepancies on chain of custody) Adjusted? No . 13, Are matrices correctly identified on Chain of Custody? No L ~ 14. Is it clear what analyses were requested? Yes V No 🗌 Checked by: 15. Were all holding times able to be met? (If no, notify customer for authorization.) Special Handling (if applicable) Yes NA V 16. Was client notified of all discrepancies with this order? No L Person Notified: Date By Whom: Via: eMail Phone Fax In Person Regarding: Client Instructions: 17. Additional remarks: 18. Cooler Information Cooler No Temp °C Condition Seal Intact Seal No Seal Date Signed By 14.9 Good Yes

- 1	Chain	Ö-10	Chain Of-Custody Record	Turn-Around Time	d Time:			HALL ENVIRONMENTAL
Client: N	Navajo Refining Co.	fining Co.		□ Standa	□ Rush Next Day	Next Day		ANALYSIS LABORATORY
			4	Project Name	ne:			www.hallenvironmental.com
Mailing A	ddress: F	O. Box 1	Mailing Address: P.O. Box 159 Artesia,	Quarterly V	VW Effluent Mo	onitoring	4901 Ha	4901 Hawkins NE - Albuquerque, NM 87109
NM 88211-0159	1-0159			Project #: F	Project #: P.O. # 167796		Tel. 505	505-345-3975 Fax 505-345-4107
Phone #:	Phone #: 575-748-3311	-3311						Analysis Request
email or l	Fax#: 578	email or Fax#: 575-746-5451	_	Project Manager:	nager:		80	
QA/QC Package:	sckage:							
□ Standard	ard		☐ Level 4 (Full Validation)	Mike Holde	Mike Holder / Dan Crawford	ord		
				Sampler.				
□ EDD (EDD (Type)			On Ice.	/ Yes	2 N		
				Sample Te	Temperature: 14	5.0		
Date	Time	Matrix	Sample Request ID	Container Type and #	Preservative Type	HEAL No.	Total Se by TCLP Sele	
4-1-15	10:36 Liquid	Liquid	Effluent to Wells (location #6)	1 Piastic	HNO3	180-	×	
4-1-15	-	Liquid	Effluent to Wells (location #6)	1 Plastic	Neat	-005-	×	
						1		
Date: 4-1-15	Time.	Relinquished by.	od by James 18HS	Received by:	A.	Moslis C92	Remarks: Remonth.	Remarks: Required to test on the first business day of each month.
Date	Time:	Relinquished by		Received by:		1-	(1) Totals method 6010 (2) TCLP 13:1/6010	Mod-6010
	If navaeca	n complete or	and the little of contract of the contract of	a votice of hotoe	sociational language	This course as any and the	Constitution Constitution	and the second s

Chavez, Carl J, EMNRD

From: Coons, Christina (Christie) < Christina.Coons@HollyFrontier.com>

Sent: Monday, February 02, 2015 4:24 PM

To: Dawson, Scott, EMNRD; Chavez, Carl J, EMNRD

Cc:Holder, Mike; Stone, BrianSubject:Quarterly Progress Report

Attachments: OCD Order Oct-Nov-Dec 2014 Quarterly Progress Report.pdf

Scott & Carl,

Please find attached a copy of the quarterly report required by Condition 9 of Exhibit A of the Amended and Supplemental Agreed Order between Navajo Refining Company (NRC) & OCD (Dated November 14, 2013). The original hardcopy is going out today via certified mail. Please don't hesitate to call me with any questions and thanks for your assistance in this matter.

Thanks,

Christie Coons

Environmental Administrative Assistant Navajo Refining Company, LLC P.O. Box 159 Artesia, NM 88211-0159 Desk 575-746-5488 Cell 575-616-1801 Main 575-748-3311

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February 2, 2015

Mr. Scott Dawson
Mr. Carl Chavez
Oil Conservation Division
New Mexico Energy, Minerals & Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505
Re: ACOW-6

Certified Mail/Return Receipt 7014 1200 0000 1832 3488

RE:

Navajo Refining Company, L.L.C. / Artesia Refinery Fourth Quarter 2014 Quarterly Interim Progress Report OCD Order No. WQA-OCD-CO-2013-001

Dear Sirs:

This quarterly progress report is submitted pursuant to Paragraph 9 of Exhibit A to the Amended and Supplemental Agreed Compliance Order No. WQA-OCD-CO-2013-001, dated November 15, 2013 (the "Order"). Specifically, Paragraph 9 requires that Navajo provide to the Oil Conservation Division (OCD) a quarterly interim progress report detailing the status and timeline for actions taken by Navajo during the preceding quarter under the Order. The quarterly progress report shall be due the first business day of the second month following the end of the quarter and shall include the following:

- a) A summary of all the results of sampling required pursuant to Paragraph 1 of Exhibit A to the Order, and copies of all supporting laboratory data;
- b) A summary of the results of any optional sampling taken during the preceding calendar month (copies of laboratory data for such optional sampling shall be provided to OCD upon request); and
- c) The calculation of stipulated penalties required under Section III, Paragraph 2 of the Order.

This is the Fourth Quarter 2014 progress report, detailing the actions taken during the preceding calendar quarter comprised of October 2014, November 2014, and December 2014, and due on the first business day of the second month following the end of the quarter (i.e., February 2, 2015). This report also includes the final analytical results as of January 19, 2015, and the actions taken through approximately January 19, 2015. Progress report submittal frequency has been altered from monthly to quarterly following submission of the November 2014 monthly report per the Third Amendment to the Agreed Compliance Order WQA-OCD-CO-2013-001, dated November 19, 2014, except as otherwise provided at Paragraph 9 of Amended Exhibit A. The next progress report will be submitted by May 1, 2015, addressing actions taken during first quarter 2015.

Status and Timeline for Actions Taken by Navajo

Since October 15, 2013, when Navajo refinery identified a potential violation of the toxicity characteristic leaching procedure (TCLP) selenium limit of 1 milligram per liter (mg/L) (the "Se Limit"), it has provided prompt notifications to the OCD via telephone and submission of C-141

Navajo Refining Company, L.L.C. 501 East Main • Artesia, NM 88210 (575) 748-3311 • http://www.hollyfrontier.com Forms, with a copy to the New Mexico Environment Department's (NMED) Hazardous Waste Bureau. A list of these notifications for each potential selenium measurement above the Se Limit is provided in Table 1. To date, Navajo has also complied with the reporting requirements of the Order, including submission of the results of required sampling within three (3) business days of receipt of final data and submittal of various reports (except as otherwise referenced at footnote 1, below), as follows:¹

- The interim progress report was submitted on November 21, 2013 pursuant to Paragraph 10 of Exhibit A to the Order:
- The November 2013 progress report was submitted on December 2, 2013 pursuant to Paragraph 9;
- The review of selenium sampling data report was submitted on December 4, 2013 pursuant to Paragraph 11;
- The summary of technical evaluation for short-term remedy selection report was submitted on December 13, 2013 pursuant to Paragraph 12;
- The December 2013 progress report was submitted on January 2, 2014 pursuant to Paragraph 9:
- The January 2014 progress report was submitted on February 3, 2014 pursuant to Paragraph 9:
- The February 2014 progress report was submitted on March 3, 2014 pursuant to Paragraph 9;
- The March 2014 progress report was submitted on April 1, 2014 pursuant to Paragraph 9;
- The April 2014 progress report was submitted on May 1, 2014 pursuant to Paragraph 9;
- The May 2014 progress report was submitted on June 2, 2014 pursuant to Paragraph 9;
- The June 2014 progress report was submitted on July 1, 2014 pursuant to Paragraph 9;
- The July 2014 progress report was submitted on August 1, 2014 pursuant to Paragraph 9;
- The August 2014 progress report was submitted on September 2, 2014 pursuant to Paragraph 9:
- The notice of compliance with Se Limit was submitted on September 15, 2014 pursuant to Paragraph 13:
- The notice of selection of long-term option for addressing selenium concentrations in wastewater was submitted on September 30, 2014 pursuant to Paragraph 15;
- The September 2014 progress report was submitted on October 1, 2014 pursuant to Paragraph 9;
- The October 2014 progress report was submitted on November 3, 2014 pursuant to Paragraph 9:
- The November 2014 progress report was submitted on December 1, 2014 pursuant to Paragraph 9.

¹ See Letter from Dan Crawford, P.G., Environmental Manager, Navajo, to Director, OCD, August 21, 2014, and Letter from Michael G. McKee, Vice President and Refinery Manager, Navajo, to Director, OCD, November 19, 2014 (regarding stipulated penalty payments for a small number of missed deadlines).

Table 1: Summary of Potential Selenium Violation Notifications made to the OCD

Carrella Data	Selenium Conc	entration (mg/L)	Verbal Notification	Form C-141
Sample Date	TCLP Selenium	Total Selenium	to OCD	Submittal Date
September 27, 2013	1.24	1.6	October 15, 2013	October 21, 2013
October 15, 2013	1.24	1.49	October 20, 2013	October 21, 2013
October 31, 2013	1.23	0.996	November 5, 2013	November 11, 2013
November 1, 2013 ¹	1.13	0.974	November 6, 2013	November 13, 2013
November 4, 2013	1.1	0.98	November 6, 2013	November 13, 2013
November 5, 2013	1.2	0.51	November 7, 2013	November 14, 2013

¹ As explained in Navajo's C-141 report, the corresponding discharge for this sampling event occurred on November 2, 2013.

In response to these selenium results, the Artesia Refinery took immediate action to reduce the amount of selenium in the discharge. These actions included evaluating the Refinery's process and operations, implementing an extensive selenium sampling program, temporarily reducing production rates, temporarily changing the crude slate, shutting down units to evaluate their impacts on selenium levels, and adding reverse osmosis (RO) reject wastewater upstream of the wastewater treatment system, which are described in earlier progress reports. Navajo has also aggressively pursued short-term selenium control strategies which are detailed in its report of December 13, 2013 summarizing the technical evaluation for short-term remedy selection. As described in Navajo's September 30, 2014 notice to OCD, Navajo has also now selected use of the existing 100 gpm SeRT® unit, without modification, as its long-term option for reducing selenium concentrations in wastewater. (Other long-term options that had been under consideration included the potential design and installation of a 200 gpm SeRT® unit and the modification of the existing 100 gpm SeRT® unit). An updated timeline of the activities to support these solutions is provided below.

October 30-31, 2013

- Met in Artesia to kick off process engineering by CH2M HILL for selenium reduction via SeRT® (Selenium Removal Technology) process and other WWTP upgrades.
- Negotiated an expedited project schedule with CH2M HILL to design and build a 200 gpm SeRT® Unit within 6 to 8 months.
- Reviewed feasibility of implementing Iron Co-precipitation of selenite via ferric chloride addition as a possible short-term selenium reduction technology.

November 5, 2013

• Met with Phillips 66 in California to kick off license and technology agreement for SeRT® process.

November 7, 2013

Inquired with Valero about potential purchase of an idle 100 gpm SeRT® unit.
 (Relocation of this existing unit was at that time expected to put a portion of the long-term selenium removal technology in place within an estimated 3 to 4 months. As explained in Navajo's September 30, 2014 notice, Navajo has now selected the 100 gpm SeRT® unit as its long-term option for reducing selenium concentrations in wastewater.)

November 12, 2013

- Reached agreement for purchase of the idle SeRT® equipment from the Valero Wilmington Refinery.
- Hired a relocation contractor to mark the unit for removal.

November 14, 2013

 Made arrangements to test the feasibility of ferric chloride injection to reduce selenium in wastewater effluent, with the performance of parallel testing onsite at the Refinery and at the CH2M HILL laboratory.

November 18, 2013

- Oversaw dismantling of idle SeRT® Unit at the Valero refinery.
- Scheduled to begin moving SeRT® equipment by December 2, 2013.
- Sited tie-ins and existing piping and equipment at the Navajo Refinery for use in both short- and long-term SeRT® installations.
- Confirmed via jar tests that ferric chloride injection will precipitate selenite from water and, therefore, is anticipated to result in a significant reduction in selenium TCLP levels in the Refinery's discharge at the injection wells.

November 19-22, 2013

• Completed engineering for ferric chloride injection; relevant equipment and ferric chloride ordered.

November 21, 2013

• Agreed to licensing terms with Phillips 66 on use of SeRT® technology.

November 26, 2013

• Completed installation of the equipment necessary to conduct a full-scale trial of the Iron Co-precipitation process.

November 27, 2013

• Commenced full-scale trial of Iron Co-precipitation process at a dose of 100 mg/L of ferric chloride.

November 29, 2013

• Halted the full-scale trial of Iron Co-precipitation process due to restriction in wastewater flow through the Walnut Shell Filter unit located downstream of the DAF.

December 2, 2013

Installed foundations for the 100 gpm SeRT® unit.

December 4, 2013

• Obtained interim OCD approval under Paragraph 13 of Exhibit A to the Order for the use of Iron Co-precipitation and SeRT® as remedies.

- Prepared new bench-scale test plan to provide operating guidelines for Iron Coprecipitation chemical dosing rates.
- Refinery began processing Western Canadian Select (WCS) crude again.

December 5, 2013

• Commenced extensive additional jar testing for the Iron Co-Precipitation process. The goal was to test various combinations of dosages of ferric chloride and two substances that are part of normal operation of the DAF – a coagulant and flocculent.

December 6, 2013

• Restarted full-scale Iron Co-Precipitation trial with a reduced ferric chloride dose of 20 mg/L to examine impacts on the Walnut Shell Filter.

December 9, 2013

• Equipment components for the 100 gpm trial SeRT® unit began to arrive.

December 16, 2013

- Increased ferric chloride dose for full-scale Iron Co-Precipitation trial from 20 mg/L to 50 mg/L.
- Obtained OCD approval under Paragraph 13 of Exhibit A to the Order for the use of Iron Co-precipitation and SeRT® as remedies, subject to the submittal of dates for milestones and deadlines.

December 27, 2013

 Started biweekly sample collection at various locations in the trial Iron Co-Precipitation process.

January 4, 2014

• Restarted Hydrocracker Unit.

January 17, 2014

• Mechanical completion of the 100 gpm trial SeRT® unit.

January 20, 2014

• Commissioning of the 100 gpm trial SeRT® unit.

January 30, 2014

• Refinery resumed normal production rate.

February 1, 2014

- Started 100 gpm trial SeRT® unit.
- Completed sample collection for Iron Co-Precipitation trial and converted Iron Co-Precipitation trial to continuous, full-scale operation. The trial results are summarized in Table 2 below and show an average total selenium removal efficiency of 73%.

Table 2: Selenium Measurements Collected During the Iron Co-Precipitation Trial (mg/L)

		T-805	s eff.	DAF	Eff.	Walnu Ef		Tank 8	109 Eff.	Removal Efficiency
DATE	Laboratory	Total Se	TCLP Se	Total Se	TCLP Se	Total Se	TCLP Se	Total Se	TCLP Se	on Total Se
	Hall									
12/27/2013	Environmental	1.1	0.30	0.38	0.30	0.37	0.31	0.38	0.34	66%
	Hali									
12/30/2013	Environmental	1.6	0.37	0.63	0.35	0.43	0.34	-	-	73%
	Hall					·				
1/6/2014	Environmental	1.2	0.17	0.34	0.18	0.27	0.20	•	-	78%
	Hall									
1/9/2014	Environmental	1.8	0.14	0.42	0.21	0.43	0.25	Ţ	-	76%
	Hall									
1/13/2014	Environmental	2.1	0.34	0.41	0.33	0.37	0.35	-	-	82%
	Hall									
1/16/2014	Environmental	1,6	0.18	0.25	0.22	0.20	0.20	-	-	88%
	Hall									
1/20/2014	Environmental	1.0	0.55	0.75	0.57	0.54	0.55	-	-	46%
	Hall									
1/23/2014	Environmental	1.4	0.18	0.24	0.19	0.21	0.20	-	-	85%
	Hall									
1/27/2014	Environmental	1.2	0.43	0.55	0.58	0.51	0.51	-	-	58%
	Hall									
1/30/2014	Environmental	1.0	0.26	0.30	0.27	0.23	0.29	-	-	77%

February 13, 2014

• Completed process engineering of full capacity permanent SeRT® unit.

March 20, 2014

• Achieved stable operation of 100 gpm trial SeRT unit.

March 31, 2014

• Confirmed that selenium reduction is being achieved by the 100 gpm trial SeRT® unit. The results through January 19, 2015 are summarized in Table 3 below and show an average total selenium removal efficiency of 94.2%. On September 30, 2014, this unit was selected as Navajo's long-term option for reducing selenium concentrations in wastewater, as explained in Navajo's notice to OCD of that same date.

Table 3: Selenium Measurements Collected During the 100 gpm Trial SeRT® Unit

		Flow to SeRT	SeRT I	nfluent	SeRT E	ffluent	Removal Efficiency
			Total Se	TCLP Se	Total Se	TCLP Se	On Total Se
DATE	Laboratory	(gpm)	(ppm)	(ppm)	(ppm)	(ppm)	-
2/10/2014	Hall Environmental	75	5.20	-	0.31		94%
2/12/2014	Hall Environmental	85	6.50		0.60	-	91%
2/13/2014	Hall Environmental	85	6.00	6.50	0.81	0,83	87%
2/17/2014	Hall Environmental	100	6.60	8.30	1.20	1.70	82%
2/19/2014	Hall Environmental	85	7.20	7.50	1,20	1.30	83%

		Flow to SeRT	SeRT i	nfluent	SeRT E	ffluent	Removal Efficiency
		-	Total Se	TCLP Se	Total Se	TCLP Se	On Total Se
DATE	Laboratory	(gpm)	(ppm)	(ppm)	(ppm)	(ppm)	•
2/20/2014	Hali Environmental	98	7.00	7.50	1.40	1.70	80%
2/24/2014	Hall Environmental	102	7.00	6.90	1.50	1.70	79%
2/26/2014	Hall Environmental	102	6.60	5.70	1.50	1.40	77%
2/27/2014	Hall Environmental	104	5.80	6.20	0.46	0.50	92%
3/3/2014	Hall Environmental	104	5.60	5.60	0.49	0.57	91%
3/5/2014	Hall Environmental	106	5.70	5,40	0.56	0.61	90%
3/6/2014	Hall Environmental	115	5.40	5.40	0,44	0,52	92%
3/10/2014	Hall Environmental	115	5.30	5.70	0.19	0.23	96%
3/12/2014	Hall Environmental	113	5.20	5.10	0.21	0.23	96%
3/13/2014	Hall Environmental	115	5.00	5.30	0.14	0.16	97%
3/17/2014	Hall Environmental	120	4.40	4.80	0.14	0.19	97%
3/19/2014	Hall Environmental	110	3.90	4.30	0.17	0.20	96%
3/20/2014	Hall Environmental	84	4.40	4.80	0.11	0.11	98%
3/24/2014	Hall Environmental	100	4.70	5.40	0.22	0.28	95%
3/27/2014	Hall Environmental	94	3.90	-	0.12	-	97%
3/31/2014	Hall Environmental	112	4.40	-	0.15	_	97%
4/3/2014	Hall Environmental	125	3.60		0.12	_	97%
4/7/2014	Hall Environmental	110	4.70	-	0.13	-	97%
4/10/2014	Hall Environmental	1.30	4.10	-	0.14	-	97%
4/14/2014	Hall Environmental	108	3.90	-	0.16	ba	96%
4/17/2014	Hall Environmental	125	4.00	-	0.14	-	97%
4/21/2014	Hall Environmental	105	3.00	-	0.13	-	96%
4/24/2014	Hall Environmental	115	3.50	-	0.25	-	93%
4/28/2014	Hall Environmental	110	3.40	-	0,13	-	96%
5/1/2014	Hall Environmental	70	3.60	<u>u</u> .	0.09		98%
5/5/2014	Hall Environmental	55	3.40	-	0.05	-	99%
5/8/2014	Hall Environmental	50	3,20	-	0.06	-	98%
5/12/2014	Hall Environmental	50	3.40	-	0.07	-	98%
5/15/2014	Hall Environmental	50	3.60	-	0.07	_	98%
5/19/2014	Hall Environmental	50	3.40	-	0.10	-	97%
5/22/2014	Hall Environmental	95	2.80	-	0.15	-	95%
5/27/2014	Hall Environmental	60	2.90	-	0.08	_	97%
5/29/2014	Hall Environmental	60	3.20	-	0.11	-	97%
6/2/2014	Hall Environmental	64	3.30	_	0.07	-	98%
6/5/2014	Hall Environmental	51	3,10	-	0.09	-	97%
6/9/2014	Hall Environmental	50	3.30	-	0.06	-	98%
6/12/2014	Hali Environmental	60	3.10	-	0,13	-	96%
6/16/2014	Hall Environmental	1.20	3.30	-	0.54	-	84%

		Flow to SeRT	SeRTI	nfluent	SeRT E	ffluent	Removal Efficiency
		-	Total Se	TCLP Se	Total Se	TCLP Se	On Total Se
DATE	Laboratory	(gpm)	(ppm)	(ppm)	(ppm)	(ppm)	-
6/19/2014	Hall Environmental	130	3.10	-	0.40	-	87%
6/23/2014	Hall Environmental	130	3.90	-	0.47		88%
6/26/2014	Hall Environmental	118	3.00	-	0.30	-	90%
7/1/2014	Hall Environmental	101	2.30	-	0.14	-	94%
7/3/2014	Hall Environmental	115	2.20	-	0.12	-	95%
7/7/2014	Hall Environmental	106	2.70	-	0.17	-	94%
7/14/2014	Hall Environmental	125	3,20		<0.05	-	98%
7/17/2014	Hall Environmental	92	2.70	_	0.07		97%
7/21/2014	Hall Environmental	120	2.70	-	0.23	**	91%
7/24/2014	Hall Environmental	80	2.80	-	0.14		95%
7/28/2014	Hall Environmental	114	2.50	-	0.28		89%
7/31/2014	Hall Environmental	118	3.50	-	0.32	-	91%
8/4/2014	Hall Environmental	96	3.30	-	0.06	-	98%
8/7/2014	Hall Environmental	125	3.00	•	0.04	_	99%
8/11/2014	Hall Environmental	100	2.80	-	0.04	<u>-</u>	99%
8/15/2014	Hall Environmental	100	3.60	-	0.04	bv	99%
8/21/2014	Hall Environmental	100	3,10	-	0.04	-	99%
8/25/2014	Hall Environmental	100	1.60	_	0.03	-	98%
8/28/2014 ¹	Hall Environmental	105	2.60	-	<0.05	-	98%
9/2/2014	Hall Environmental	105	3.90	_	0.04	-	99%
9/4/2014	Hall Environmental	105	3.90	-	0.03	-	99%
9/8/2014	Hall Environmental	95	4.60	-	0,06	•	99%
9/11/2014	Hali Environmental	90	4.20		0.03	-	99%
9/15/2014	Hall Environmental	90	4.40	-	0.04	H	99%
9/18/2014	Hall Environmental	100	5.00	-	0.04	-	99%
9/22/2014	Hall Environmental	61	5.30	-	0.04	-	99%
9/25/2014	Hall Environmental	90	6.10	_	0.12	-	98%
9/29/2014	Hall Environmental	90	6.40	-	0.07	_	99%
10/2/2014	Hall Environmental	95	6.50	-	0.05	-	99%
10/6/2014	Hall Environmental	100	8,60		0.09	-	99%
10/9/2014	Hall Environmental	88	8,90	-	0.11	_	99%
10/13/2014	Hall Environmental	100	7.30	-	0.10		99%
10/16/2014	Hall Environmental	115	6.30	-	0.11	-	98%
10/20/2014	Hall Environmental	115	5.10	-	0.13	-	97%
10/23/2014	Hall Environmental	100	4,40	-	0.09	-	98%
10/27/2014	Hall Environmental	105	2.50	-	0.06	-	98%
10/30/2014	Hall Environmental	90	3.70	-	0.04	-	99%
11/3/2014	Hall Environmental	100	3.20	-	0.03	-	99%

		Flow to SeRT	SeRT I	nfluent	SeRT E	ffluent	Removal Efficiency
		-	Total Se	TCLP Se	Total Se	TCLP Se	On Total Se
DATE	Laboratory	(gpm)	(ppm)	(ppm)	(ppm)	(ppm)	-
11/6/2014	Hall Environmental	100	3,50	1	0.03	-	99%
11/10/2014	Hall Environmental	110	2.70	-	0.05	-	98%
11/13/2014	Hall Environmental	110	3.30	-	0.06	-	98%
11/17/2014	Hall Environmental	100	3.30	-	0.03	-	99%
11/24/2014	Hall Environmental	90	3.50	-	0.04	-	99%
11/26/2014	Hall Environmental	100	3.50	-	0.39	-	89%
12/1/2014	Hall Environmental	100	3,80	-	1.10	-	71%
12/2/2014	Hall Environmental	100	3.90	-	1,10	-	72%
12/8/2014	Hall Environmental	100	4.00	-	1.50	-	63%
12/10/2014	Hall Environmental	100	5.20	-	0.37	-	93%
12/11/2014	Hall Environmental	100	5.20	-	0.35	-	93%
12/12/2014	Hall Environmental	100	2.20	-	0.12	-	95%
12/15/2014	Hall Environmental	90	5.10	-	0.10	-	98%
12/18/2014	Hall Environmental	90	4.20	-	0.05		99%
12/22/2014	Hall Environmental	95	3.70	-	0.07	-	98%
12/29/2014	Hall Environmental	100	3.60	-	0.10	-	97%
1/2/2015	Hall Environmental	95	3,20	-	0.09	-	97%
1/5/2015	Hall Environmental	70	3.90	-	0.08	-	98%
1/8/2015	Hall Environmental	85	3.50	_	0.07	<u>.</u>	98%
1/12/2015	Hall Environmental	84	3.50		<0.050	*	99%
1/15/2015	Hall Environmental	72	2.80	-	1.40		50%
1/19/2015	Hall Environmental	82	2.50	-	0.09	1	96%

¹ The sampling event on August 28, 2014 showed a SeRT Influent concentration of <0.05 ppm and a SeRT Effluent concentration of 2.60 ppm. Samples were likely either switched in the field before being labeled, or mislabeled. Table 3 shows the correct concentration associated with each location.

April 1, 2014

• Required sampling from this point forward reduced to a quarterly basis per Condition 1(c) of Exhibit A to the Order.

April 22, 2014

• First Amendment to Exhibit A signed by Navajo and OCD.

June 2, 2014

• Navajo submitted a minor permit modification requested by OCD for the installation of the SeRT® & ICP units at the Artesia Refinery.

June 24, 2014

• OCD approved the modification request submitted on June 2.

June 1 to 2, 2014

• Navajo temporarily stopped injection while doing the Pressure Fall Off Tests (PFOTs) and Mechanical Integrity Testing (MIT) for Well 1.²

June 30 to July 2, 2014

• Navajo temporarily stopped injection while doing the PFOTs and MIT for Well 2.2

July 7-9, 2014

 Used SeRT® media was replaced by new media. The media change-out started on July 7, 2014 and was completed on July 9, 2014. The unit was brought on-line on July 10, 2014. The pH probes were also replaced.

August 11, 2014

• Met with OCD to discuss amending Exhibit A to clarify reporting and sampling in connection with cessation of well injection per Navajo's July 25, 2014 letter.

August 25-28, 2014

• Navajo temporarily stopped injection for PFOTs and MIT for Well 3.2

September 3 and 8, 2014

Second Amendment to Exhibit A signed by OCD and Navajo.

September 15, 2014

Notice of Compliance with Selenium Limit submitted to OCD.

September 30, 2014

• Notice of selection of long-term option for addressing selenium concentrations in wastewater submitted to OCD.

November 19, 2014

- Third Amendment to Exhibit A signed by OCD and Navajo.
- Navajo paid OCD the stipulated penalty of \$26,000 for late submission of October 1, 2014 quarterly sampling results.

As noted in the February 2014 monthly interim progress report submitted on March 3, 2014, Navajo will consider discontinuing ferric chloride injection based on the performance of the 100 gpm SeRT® unit. Also, as noted above, on September 30, 2014, Navajo submitted to OCD its notice of selection of long-term option for selenium reduction pursuant to Paragraph 15 of Exhibit A to the Order. Navajo selected the existing SeRT® unit, without modification, based on its proven effectiveness in reducing selenium concentrations (now, as of the January 19, 2015 sample, at an

² Pressure Fall Off tests and Mechanical Integrity Testing are unrelated to selenium concentrations in the wastewater injected at the wells.

average total selenium removal efficiency of 94.2%) and Navajo's record of compliance with the Se Limit using this technology.³

In addition to the status and timeline of actions taken by Navajo, this monthly report includes the requirements of items a-c of Paragraph 9 of Exhibit A to the Order, as follows.

a) A summary of all the results of sampling required pursuant to Paragraph 1, above, and copies of all supporting laboratory data.

A summary of the results of sampling collected pursuant to Paragraph 1 of Exhibit A to the Order are provided in Table 4. This table includes only those samples collected at the OCD-approved Sample Location (location shown in Attachment A) on the first business day of each week after the effective date of the Order up to April 1, 2014. The April 1 sampling event constituted the fourth consecutive monthly sample below the 1.0 mg/L limit and, therefore, pursuant to Condition 1(c) of Exhibit A to the Order, sampling is being conducted on a quarterly basis on the first business day of the quarter. The 4th quarter 2014 quarterly sample was taken on October 1, 2014 and the 1st quarter 2015 quarterly sample was taken on Friday, January 2, 2015. The next quarterly sample is scheduled to be taken on Wednesday, April 1, 2015. There have been no non-compliant sampling events since issuance of the Order on November 14, 2013. Additional monitoring is also presented in Table 4. As noted above, since the November monthly progress report, the 1st quarter 2015 sample was taken pursuant to Paragraph 1(c) of Exhibit A to the Order on January 2, 2015, and the lab report for the January 2, 2015 quarterly sample can be found in Attachment B. (The laboratory report for the October 1, 2014 quarterly sampling event was submitted with the October monthly progress report.)

As described in the December 4, 2013 review of selenium sampling data report, CH2M HILL made certain recommendations to modify sample preparation and processing in order to decrease variability in sampling analysis procedures and analytical instrumentation configurations used by Navajo's contract laboratories. Specifically, Hall Environmental implemented the following procedural modifications starting December 9, 2013, among certain other earlier changes:

- 1. Filtrations for TCLP analysis by EPA Method 1311 are now made using a 0.7 micron glass fiber filter.
- 2. An acid matrix of 6% nitric acid and 5% hydrochloric acid is now used in accordance with EPA Method 3010.
- 3. Calibration standards and quality control samples are now prepared using the same acid matrix (6% nitric acid and 5% hydrochloric acid).
- 4. An internal standard of yttrium or scandium is now used in all samples. If the recovery of the internal standard exceeds 120%, the samples are to be screened for a native presence of the internal standard. If the samples natively contain the target internal standard, an alternate internal standard is to be utilized.
- 5. The same preparation batches and analytical batches are now used for digestion and analysis of TCLP and total selenium samples. Ideally, a sample is analyzed for total selenium and is

³ As explained in the September 30th notice, Navajo reserves the right to modify the current SeRT® unit in the future should changes become necessary based on wastewater effluent characteristics, refinery operational needs or other circumstances.

- then analyzed for TCLP selenium immediately afterwards to reduce variations due to instrument calibration, instrument drift, or digestate age.
- 6. All spectra for samples are now reviewed to verify that there are no optical interferences and that peaks are being correctly integrated.
- 7. All split samples are now analyzed using the same acid digestion and analytical methods to ensure data comparability.

Table 4: Selenium Measurements Collected Pursuant to Paragraph 1 of Exhibit A to the Order (mg/L)

DATE	Sampling Location	Laboratory	Method	TCLP Seleni	um (mg/L)
DATE	Sampling Location	Laboratory	Metuod	Split Samples	Average ²
10/24/2013 ¹	T-801 Effluent	ALS Environmental	SW1311/6020	0.82	0.78
10/24/2015	1-901 Ellineur	Hall Environmental	EPA 6010B	0.74	0.78
10/28/2013 ¹	T-801 Effluent	Hall Environmental	EPA 6010B	0.98	0.98
11/4/2013¹	Injection Well Effluent Sampling Point	Hall Environmental	EPA 6010B	1.10	1.10
11/11/2013 ¹	Injection Well Effluent Sampling Point	Hall Environmental	EPA 6010B	0.088	0.088
11/18/2013	Injection Well Effluent Sampling Point	Hall Environmental	EPA 6010B	0.78	0.78
11/25/2013	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.75	0.75
12/2/2013	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.88	0.88
12/9/2013 ³	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.38	0.38
12/16/2013	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.35	0.35
12/23/2013	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.27	0.27
12/30/2013	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.33	0.33
1/6/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.23	0.23
1/13/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.31	0.31
1/20/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.51	0.51
1/27/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.49	0,49
2/3/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.56	0.56
2/10/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.20	0.20
2/17/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.20	0.20
2/24/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.28	0.28
3/3/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.14	0.14
3/10/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.05	0.05
3/13/2014	T-836 Effluent to Wells	Hall Environmental	EPA 6010B	0.08	0.08
3/17/2014	T-801 Effluent to Wells	Hall Environmental	EPA 6010B	0.05	0,05
3/24/2014	T-801 Effluent to Wells	Hall Environmental	EPA6010B	0.15	0.15
4/1/20144	T-801 Effluent to Wells	Hall Environmental	EPA6010B	0.08	0.08
7/3/20144	T-801 Effluent to Wells	Hall Environmental	EPA6010B	< 0.027	< 0.027
10/1/20144	T-836 Effluent to Wells	Hall Environmental	EPA6010B	0.04	0.04
1/2/20154	T-801 Effluent to Wells	Hall Environmental	EPA6010B	< 0.027	< 0.027

b) A summary of the results of any optional sampling taken during the preceding calendar month (copies of laboratory data for such optional sampling shall be provided to OCD upon request).

A summary of all of the TCLP selenium concentrations measured at the OCD-approved Sample Location and at the effluent of treatment tanks T-801 and T-836 is provided in Attachment C. All of the TCLP selenium measurements for all refinery sample locations are provided in Attachment D, and all of the total selenium measurements for all refinery sample locations are provided in Attachment E. The data provided in all of these attachments is for sampling performed during the months of October 2013, November 2013, December 2013, and calendar year 2014 through January 19, 2015.

c) The calculation of stipulated penalties required under Section III, Paragraph 2 of the Order.

As of the most recent sampling event, there are no new reported exceedances of the Se Limit. On November 20, 2013 Navajo submitted payment of the penalty of \$26,000 established in the Order for prior reported selenium concentrations above the Se Limit. As explained in Navajo's July 25, 2014 letter to OCD, Navajo was unable to conduct quarterly sampling on July 1, because there was no injection at the wells on that day due to PFOTs and mechanical integrity testing. Quarterly sampling was not conducted until July 3, 2014, after the discharge to the wells resumed, a delay of two days. Also, Navajo was one day late in submitting the results of its quarterly selenium sampling to OCD, which were required to be submitted by July 17, and were instead submitted on July 18, 2014. Per the stipulated penalty schedule at Section III, Paragraph 2 of the Order, Navajo calculated a stipulated penalty of \$5,000.4 This sum was paid by letter dated August 21, 2014. Navajo was also late in submitting the results of its October 1, 2014 quarterly selenium sampling to OCD, which were received on October 6, 2014, and conservatively assumed to be required to be submitted by October 8. They were instead submitted on November 3, and as a result, were 26 days late. Based on this, and per the stipulated penalty schedule at Section III, Paragraph 2 of the Order, Navajo calculated a stipulated penalty of \$26,000.5 This sum was paid by letter dated November 19, 2014. Navajo is taking preventive steps to help ensure timely quarterly sampling and reporting of corresponding sample results.

¹Samples collected per the requirements of the Agreed Compliance Order No. WQA-OCD-CO-2013-001 signed on October 24, 2013.

²For split samples.

³Digestion procedure and sample processing altered as described above.

⁴Required sampling conducted on a quarterly basis per Condition 1(c) of Exhibit A to the Order – accentuated as requested by Carl Chavez on April 30, 2014.

⁴ Per Order Section III, Paragraph (2)(b)(4), for failure to conduct timely sampling, \$2,000 per day X 2 days = \$4,000; per Order Section III, Paragraph (2)(b)(5), for failure to timely submit any report or notification, \$1,000 per day X 1 day = \$1,000.

⁵ Per Order Section III, Paragraph (2)(b)(5), for failure to timely submit any report or notification, \$1,000 per day X 26 days = \$26,000.

If you have any questions, please do not hesitate to contact me at (575) 308-1511 or brian.stone@hollyfrontier.com. Thank you for your assistance in this matter and we will continue to work closely with you as we resolve the issues associated with selenium concentrations.

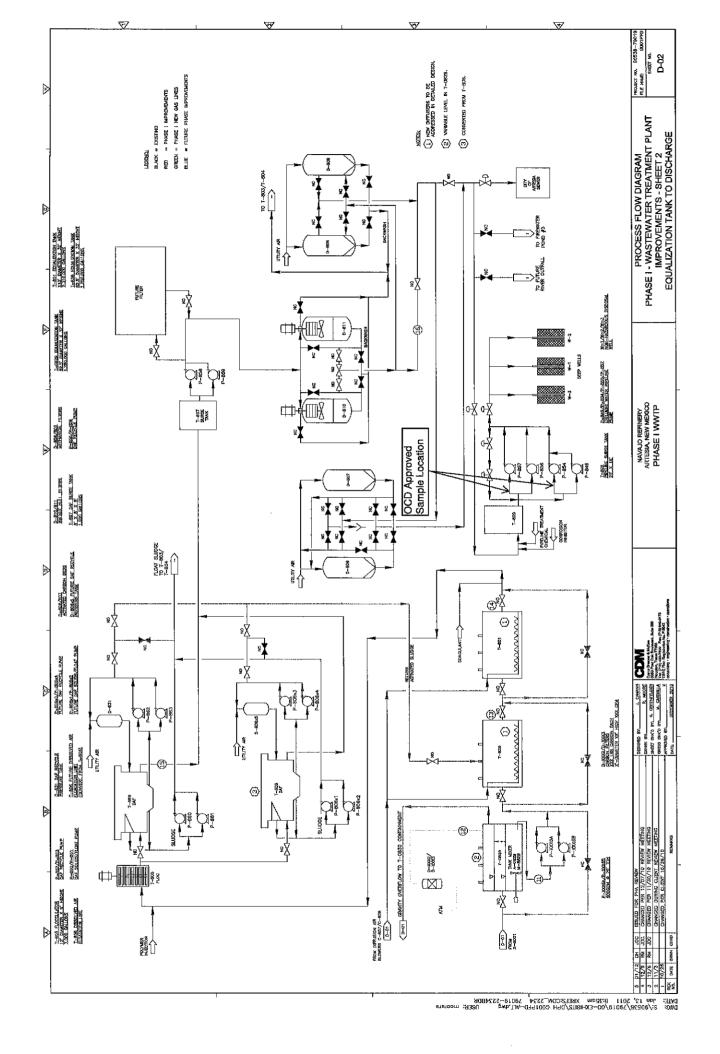
Sincerely,

BMSTANE

Brian Stone Environmental Specialist

Navajo Refining Company, L.L.C.

Attachment A: OCD-Approved Sample Location



Attachment B: Laboratory Reports for Samples Collected Pursuant to Paragraph 1 of Exhibit A to the Order



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: www.hallenvironmental.com

January 12, 2015

Mike Holder Navajo Refining Company P.O. Box 159 Artesia, NM 88211-0159 TEL: (575) 748-3311

FAX

RE: Quarterly WW Effluent Monitoring

OrderNo.: 1501149

Dear Mike Holder:

Hall Environmental Analysis Laboratory received 1 sample(s) on 1/7/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

4901 Hawkins NE

Albuquerque, NM 87109

Analytical Report

Lab Order 1501149

Date Reported: 1/12/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Navajo Refining Company

Client Sample ID: Effluent to Wells (location #6)

Project: Quarterly WW Effluent Monitoring

Collection Date: 1/2/2015 8:30:00 AM

Lab ID: 1501149-001

Matrix: AQUEOUS

Received Date: 1/7/2015 9:45:00 AM

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed	Batch ID
EPA METHOD 6010B: TCLP METALS							Analyst: ELS	
Selenium	ND	0.027	0.050		mg/L	1	1/8/2015 6:21:27 AM	17109
EPA 6010B: TOTAL METALS							Analyst: ELS	
Selenium	0.029	0.014	0.050	J	mg/L	1	1/8/2015 6:19:37 AM	17109

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.
- RL Reporting Detection Limit

Page 1 of 3

OC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1501149

12-Jan-15

Client:

Navajo Refining Company

Project:

Quarterly WW Effluent Monitoring

Sample ID MB-17109

SampType: MBLK

TestCode: EPA Method 6010B: TCLP Metals

Client ID:

PBW

Batch ID: 17109

PQL

RunNo: 23522

Prep Date: 1/7/2015 Analysis Date: 1/8/2015

SeqNo: 694945

Units: mg/L

Analyte

Result

SPK value SPK Ref Val %REC LowLimit

HighLimit

RPDLimit

Qual

Selenium

ND 1.0

Sample ID LCS-17109

SampType: LCS

TestCode: EPA Method 6010B: TCLP Metals

%RPD

Client ID: LCSW Prep Date: 1/7/2015

Batch ID: 17109

RunNo: 23522

LowLimit

SeqNo: 694946

Units: mg/L

Analyte

Analysis Date: 1/8/2015

0.48

HighLimit

%RPD **RPDLimit**

Qual

Selenium

SPK value SPK Ref Val 1.0 0.5000

%REC 95.3

120

Qualifiers:

Value exceeds Maximum Contaminant Level.

Е Value above quantitation range

Analyte detected below quantitation limits

0 RSD is greater than RSDlimit

R RPD outside accepted recovery limits

Spike Recovery outside accepted recovery limits

Analyte detected in the associated Method Blank

H Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit Page 2 of 3

Sample pH greater than 2. P

Reporting Detection Limit

OC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#:

1501149

12-Jan-15

Client:

Navajo Refining Company

Project:

Quarterly WW Effluent Monitoring

Sample ID MB-17109

SampType: MBLK

TestCode: EPA 6010B; Total Metals

Client ID: PBW Batch ID: 17109

RunNo: 23522

Prep Date: 1/7/2015 Analysis Date: 1/8/2015

SeqNo: 694914

Units: mg/L

Analyte

Result PQL

%REC LowLimit

%RPD

%RPD

HighLimit

RPDLimit

Qual

Selenium

ND 0.050

Sample ID LCS-17109

SampType: LCS

TestCode: EPA 6010B: Total Metals

Client ID: LCSW Batch ID: 17109

RunNo: 23522

Prep Date: 1/7/2015

0.050

%REC

Units: mg/L

Analysis Date: 1/8/2015

SeqNo: 694915

HighLimit

RPDLimit Qual

Analyte

PQL

0.5000

SPK value SPK Ref Val

SPK value SPK Ref Val

95.3

Selenlum

Result 0.48

LowLimit

120

Qualifiers:

- Value exceeds Maximum Contaminant Level.
- В Value above quantitation range
- Analyte detected below quantitation limits J
- 0 RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- Analyte detected in the associated Method Blank
- Н Holding times for preparation or analysis exceeded
- Not Detected at the Reporting Limit ND
- P Sample pH greater than 2.
- Reporting Detection Limit

Page 3 of 3



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87105

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: NAVAJO REFINING COM Work Order Numb	er: 1501149		RcptNo: 1	
Received by/date: 61 07 17 Logged By: Lindsay Mangin 1/7/2015 9:45:00 AM	1	JulyHlago	, 80	,,
Completed By: Lindsay Mangin 1/7/2015 19:26:15 A	М	Janly Haly O		
Reviewed By: 0107	15			
Chain of Custody				
1. Custody seals intact on sample bottles?	Yes 🗹	Ņo □	Not Present 🗆	
2. Is Chain of Custody complete?	Yes 🔽	No 🗌	Not Present	
3. How was the sample delivered?	<u>FedEx</u>			
<u>Log In</u>				
4. Was an attempt made to cool the samples?	Yes 🗹	No 🗌	na 🗆	
5. Were all samples received at a temperature of >0° C to 6.0°C	Yes 🗹	No 🗆	NA 🗆	
6. Sample(s) In proper container(s)?	Yes 🗹	No 🗆		
7. Sufficient sample volume for indicated test(s)?	Yes 🗹	No 🗆		
8. Are samples (except VOA and ONG) properly preserved?	Yes 🗸	No 🗆	_	
9. Was preservative added to bottles?	Yes 🗌	No 🗸	na 🗆	
10.VOA vials have zero headspace?	Yes 🗆	No 🗆	No VOA Vials 🗹	
11. Were any sample containers received broken?	Yes	No 🗹	# of preserved	
	v. 1771	No 🗀	bottles checked for pH:	1
12,Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes 🔽	No 🗀	(<2 o	r >12 unless noted)
13. Are matrices correctly identified on Chain of Custody?	Yes 🗹	No 🗌	Adjusted?	no
14. Is it clear what analyses were requested?	Yes 🗹	No 🗆		A 0
15. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes 🗹	No 🗆	Checked by:	Carrie San
Special Handling (if applicable)	🖂	,. m	na 🗹	
16, Was client notified of all discrepancies with this order?	Yes 🗌	No 🗔	NA [⊻]	7
Person Notified: Date	•	:	,	
By Whom: Via:	eMail [Phone 🗌 Fax	In Person	
Regarding			<u>:</u>	
Client Instructions:				
17. Additional remarks:				
18. Cooler Information Cooler No Temp C Condition Seal Intact Seal No 1 1.0 Good Yes	Seal Date	Signed By		

Chain-C	30	Chain-of-Custody Record	Self Pest Association	ANALYSIS LABORATORY
Ment Navaro Relining Co	දු ව		D CONTRACTOR OF THE PROPERTY O	www.hallenvironmental.com
				4901 Hawkins NE - Albuquerque, NM 87109
Mailing Address: P.O. Box 159 Artesia	D. Box 15		Quarterly Www Effluent Montroung	Tel. 505-345-3975 Fax 505-345-4107
NM 88211-0159				
Phone #, 575-748-3311	748-5451		Project Manager.	
OA/OC Package:		口 Level 4 (Full Validation)	Mike Holder / Dan Crawford	
C eccy (1/28)			Semple Temperature 1.000	f minak
98	X	Sample Request ID	Container preservative HEVI NE	
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Attachment C: Additional Monitoring Performed at the Injection Well Effluent Sampling Location and Treatment Tanks T-801 and T-836

Attachment C Table 1: TCLP Selenium Measurements Collected from the Injection Well Effluent Sampling Location, Tank T-801, and Tank T-836 Effluent (mg/L), EPA Method SW1311/6020/6010

		Split Samples (mg/L)				
DATE	Sampling Location	Laboratory	TCLP Selenium Concentration	Laboratory	TCLP Selenium Concentration	TCLP Selenium Concentration
9/27/2013	Injection Well Effluent Sampling Point	ALS	1.24		<u>-</u>	1.24
10/15/2013	Injection Well Effluent Sampling Point	ALS	1.24	-	-	1.24
10/20/2013	T-801 Effluent	Hall	0.85	ALS	0.803	0.83
10/20/2013	T-836 Effluent	Hall	0.91	ALS	0.888	0.90
10/22/2013	T-801 Effluent	Hall	0.75	ALS	0.708	0.73
10/22/2013	T-836 Effluent	Hall	0.65	ALS	0.823	0.74
10/23/2013	T-801 Effluent	Hall	0.79	ALS	0.835	0.81
10/23/2013	T-836 Effluent	Hall	0.75	ALS	0.831	0.79
10/24/2013	T-801 Effluent	Hall	0.74	ALS	0.821	0.78
10/24/2013	T-836 Effluent	Hall	0.58	ALS	0.648	0.61
10/25/2013	T-801 Effluent	Hall	0.79	-	-	0.79
10/25/2013	T-836 Effluent	Hall	0.71	-	-	0.71
10/26/2013	T-801 Effluent	Hall	0.81	_		0.81
10/26/2013	T-836 Effluent	Hall	0.83	_		0.83
10/27/2013	T-801 Effluent	Hall	0.95	-	-	0.95
10/27/2013	T-836 Effluent	Hall	0.75	-	-	0.75
10/28/2013	T-801 Effluent	Hall	0.98	-	-	0.98
10/28/2013	T-836 Effluent	Hall	0.84	_	_	0.84
10/29/2013	T-801 Effluent	Hall	0.99	Cardinal	0.98	0.99
10/29/2013	T-836 Effluent	Hall	0.94	Cardinal	0.97	0.95
10/30/2013	T-801 Effluent	Hall	0.83	Cardinal	0.88	0.85
10/30/2013	T-836 Effluent	Hall	0.88	Cardinal	0.90	0.89
10/31/2013	Injection Well Effluent Sampling Point	Hall	1.20	-	_	1.20
10/31/2013	T-801 Effluent	Hall	0.80	Cardinal	1.09	0.95
10/31/2013	T-836 Effluent	Hall	1.20	Cardinal	1.26	1.23
11/1/2013	T-801 Effluent	Hall	0.89	Cardinal	0.94	0.92
11/1/2013	T-836 Effluent	Hall	1.10	Gardinal	1.16	
11/2/2013	No Sample	_	-	-	- Annual of Annual Annu	##
11/3/2013	No Sample	<u>.</u>	_	_	-	-
	Injection Well Effluent					
11/4/2013	Sampling Point	Hall	1.10	-	_	1.10
11/4/2013	T-801 Effluent	Hall	0,74			0.74
11/4/2013	T-836 Effluent	Hall	0.98	-	-	0.98
11/5/2013	Injection Well Effluent Sampling Point	Hall	1.20	_		1.20

			Split Sam	ples (mg/L)		Average (mg/L)
DATE	Sampling Location	Laboratory	TCLP Selenium Concentration	Laboratory	TCLP Selenium Concentration	TCLP Selenium Concentration
11/5/2013	T-801 Effluent	Hall	1.20			1.20
11/6/2013	T2836 Effluent	Hall	0.78			0,73
11/7/2013	T-801-Effluent	Hall	0.95			0,95
11/7/2013	T-836 Effluent	Hall	4,10	The object of the control of the con		1,10
11/8/2013	r-801-Effluent	Hall	0.7/8			0.78
11/8/2013	E.836 Effluent	Hall	1,20	It is the property of the control of		1,20
4:1/9/2013	I=836 Effluent	Hall	1.1			1,:10
=11/10/2013	T-836 Effluent	Hall	1.1	The spine of the second		1,10
	Injection Well Effluent					The second secon
11/11/2013	Sampling Point	Hall	0.088		_	0.09
=11/11/201 3 =	T-836 Effluent	Hall	1.100	Section 1 and 1 an		1,10
11/12/2013	No Sample	-	-	-	-	-
11/13/2013	No Sample	-	_	-	_	-
-11/14/2013 ² -	T-886 Effluent	Hall	1.0		***************************************	0.99
11/15/2013	No Sample	-	-	-		-
11/15/2012	Injection Well Effluent	11-11	-0.4 (ND)			
11/16/2013	Sampling Point Injection Well Effluent	Hall	<0.1 (ND)	-	-	-
11/17/2013	Sampling Point	Hall	0.96	<u>-</u>	_	0.96
	Injection Well Effluent			•		
11/18/2013	Sampling Point	Hall	0.78		— — — — — — — — — — — — — — — — — — —	0.78
11/18/2018	T-886 Effluent	Hall	1,00			1,00
11/19/2013	T-836 Effluent to Wells	Hall	0.95	-	-	0.95
11/20/2013	Injection Well Effluent	ttell	0.76			0.76
	Sampling Point T-801 Effluent to Wells	Hall	0.76		-	0.76
11/21/2013 11/22/2013		Hall	0.73	-	-	0.73
	T-836 Effluent to Wells	Hall	0.80		-	0.80
11/23/2013	T-801 Effluent to Wells	Hall	0.75	-	-	0.75
11/24/20131	T-836 Effluent to Wells	Hall	0.84	-	-	0.84
11/25/2013	T-801 Effluent to Wells	Hall	0.75	-	-	0.75
11/26/2013	T-836 Effluent to Wells	Hall	0.72		-	0.72
11/27/2013	T-801 Effluent to Wells	Hall	0.69	-	-	0.69
11/28/2013	T-836 Effluent to Wells	Hall	0.80	-	~	0.80
11/29/2013	T-801 Effluent to Wells	Hall	0.75	-	-	0.75
11/30/2013	T-801 Effluent to Wells	Hall	0.76	_	-	0.76
12/2/2013	Injection Well Effluent Sampling Point	Hall	0.88	-	-	0.88
12/2/2013	T-836 Effluent to Wells	Hall	0.76	-	-	0.76
12/2/2013	T-801 Effluent to Wells	Hall	0.83	_	_	0.83
12/5/2013	T-836 Effluent to Wells	Hall	0.47	-	-	0.47

			Split Sam	ples (mg/L)		Average (mg/L)
DATE	Sampling Location	Laboratory	TCLP Selenium Concentration	Laboratory	TCLP Selenium Concentration	TCLP Selenium Concentration
12/9/2013 ³	T-801 Effluent to Wells	Hall	0.38	-	-	0.38
12/12/2013	Effluent to Wells	Hall	0.56	-	-	0.56
12/16/2013	T-801 Effluent to Wells	Hali	0.35	_	-	0.35
12/19/2013	T-801 Effluent to Wells	Hali	0.24	-	-	0.24
12/23/2013	T-836 Effluent to Wells	Hall	0.27	-	-	0.27
12/26/2013	T-801 Effluent to Wells	Hall	0.27	-	-	0.27
12/30/2013	T-836 Effluent to Wells	Hall	0.33	-		0.33
1/6/2014	T-836 Effluent to Wells	Hall	0.23	-	-	0.23
1/9/2014	T-801 Effluent to Wells	Hall	0.29	_	-	0.29
1/13/2014	T-801 Effluent to Wells	Hall	0.31	-	_	0.31
1/16/2014	T-801 Effluent to Wells	Hall	0.24	_	-	0.24
1/20/2014	T-836 Effluent to Wells	Hall	0.51	-	-	0.51
1/23/2014	T-836 Effluent to Wells	Hall	0.23	-	_	0.23
1/27/2014	T-801 Effluent to Wells	Hall	0.49	-	-	0.49
1/30/2014	T-836 Effluent to wells	Hall	0.27	-	-	0.27
2/3/2014	T-836 Effluent to wells	Hall	0.56	_	-	0.56
2/6/2014	T-836 Effluent to wells	Hall	0.40	-	_	0.40
2/10/2014	T-836 Effluent to wells	Hall	0.20	_	-	0.20
2/17/2014	T-801 Effluent to wells	Hall	0.20	-	-	0.20
2/24/2014	T-801 Effluent to wells	Hall	0.28	-	_	0.28
3/3/2014	T-801 Effluent to Wells	Hall	0.14	-	_	0.14
3/10/2014	T-836 Effluent to Wells	Hall	0.05	_	_	0.05
3/13/2014	T-836 Effluent to Wells	Hall	0.08	-	-	0.08
3/17/2014	T-801 Effluent to Wells	Hall	0.05	_	-	0.05
3/24/2014	T-801 Effluent to Wells	Hall	0.15	-	-	0.15
4/1/20144	T-801 Effluent to Wells	Hall	0.08		-	0.08
6/19/2014	T-801 Effluent to Wells	Hall	<0.10	-	-	<0.10
7/3/20144	T-801 Effluent to Wells	Hall	< 0.027	-	_	< 0.027
7/22/2014	T-801 Effluent to Wells	Hall	<0.027	-	-	<0.027
8/25/2014	T-836 Effluent to Wells	Hall	<0.027	-	_	<0.027
8/28/2014	T-836 Effluent to Wells	Hall	<0.027	-	-	<0.027
10/1/20144	T-836 Effluent to Wells	Hall	0.04	-	-	0.04
11/3/2014	T-836 Effluent to Wells	Hall	0.10	-	_	0.10
11/6/2014	T-836 Effluent to Wells	Hall	<0.20	_	-	<0.20
1/2/20154	T-801 Effluent to Wells	Hall	< 0.027	-	-	< 0.027

Gray/Shading:= Sampling:performed:when the tanks were not discharging to the injection wells.

Note: Samples labeled as "T-801 Effluent to Wells" or "T-836 Effluent to Wells" were collected from the OCD-approved sample location.

¹ Date of the Agreed Compliance Order No. WQA-OCD-CO-2013-001 signed on October 24, 2013.

² Date of the Supplemental Agreed Compliance Order No. WQA-OCD-CO-2013-001, signed on November 14, 2013.

³Digestion procedure and sample processing altered as described in the text above based upon the December 4, 2013 CH2M HILL review of selenium sampling data report.

⁴Required sampling conducted on a quarterly basis per Exhibit A, Condition 1(c) of the Order.

Attachment D:
Additional TCLP Selenium Monitoring Performed at the Navajo
Refinery

	Tab Raport		1310034	1310767	1310A04	1310959	1310A71	13101021	1310847 1310848	13101085	1310006	13101164	131053	1310058	1310050	1310018	1310078	H302620	1310E22 1210E23	H802639	1310E78 1310E81 1311035	H302652	1311033	H302670	1311082	1311269	1311209	1311286	1311362	1311362
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	7-886	Ave*	'	,		960		0.74		0.79		0.61	0.71	0.83	0.75	0.84		0.95		0.89	ì	1.23		1.13	850	,	0.73	1.10	1.20	1,10
	Z.	Result	_'		0.91	0.89	0.65	0.82	k.	0.83	850	0.65	17.0	0.83	0.75	0.84	ğ	760	980	9	571	1.26	1.10	3.16	96'0	,	0.73	1,10	1.20	1,10
	T-801	Yes.				0,88		0.73		0.82	_	0.78	6.73	0.81	0.95	850		66.0		0.85		8	· ·	0.92	0.74	1.20		26.0	0.78	
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70	ZD)	Alte*						'	. ,			_	4.20	3.80	3.80	3.80		3,44		3.52		3.59		3.72				4,10	3.80	3.30
100	2 2	Result	_	r		_ '	_	'	'			_	4.20	3.80	3,80	3.30	3.80	3.08	3.70	3,33	4.00	3.18	4.10	æŧ	3.50			4.10	3.80	3.30
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346	ES .	Needt	•	•	5.80	4.92	3.60	1.15	5,20	8.4	5.00	5.03	5.30	4.70	4.30	4.50	4.90	4.01	3.70	3.03	4.00	3.15	4.00	3.46	8.5	,	,	3.60	3.80	3,60
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7-836	Restrict	1.10	130	0.39	,	,	1,00		,	0.86	•	•	•	6,74	•			'	·	97.0	·		_	•	•	0.10		-
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2	Result				_			-		0.63	٠	·	•	0.46	٠	'	1	,	,	0.83	'	•	٠	,	0.11	1	0.55	•
adet	Result	0.20	50	0.21	•		150	r		0.43	•	7	•	0.46	•	1				0.48	·	,	,	•		1		
AM-tolet	Ave	•		•	•			•	•		•	,	•			1			•	•	1	,	•	•	'		'	5
ŧ	Result	•		•	•	٠		,		,	•	٠.	•	•		'	,		٠	,	,		•	•		,	,	•
Desalter Order (D-2101)	Result	,	,	٠	•	•	'			•	•	•	,			1	•		•	•	0.87	2.20	1.10	3.10	1.30	7.30	3.30	.
Desitur Outlet (0-(30)	Result	•	-	•	•	•	-	•	•		•	•	•	,					•		0.43	1.50	0.41	1.60	1.60	2.00	2.60	•
Serubber D-250)	Ava		,	4.	1	•	-	-	•	•	•	•			10.00			,	•	9.40	2520	7.40	12.00	11.00	7.90	17.00	9.20	
Wet Gas Serbbar Purgn (D-250)	Result	-	,	1		,	,	•	•	,	•	•	•	1	30.00	-	•		•	9,40	0.52	7.40	12.00	11.00	7,90	17.00	3.20	'
Series Fi	Result	-	'	•	'	-	,	'		,		Ĺ		-	•	'	,	•	•		•	,		•	•	•	'	,
COAF EII.	Austra	-				-		Ľ	,	,		·	,			,	•	,					·		·	•	<u> </u>	,
P J	Anna Maria	-				_		ľ		'	•	ġ	,						_	•	1				_		,	,
Desafter Effluent (M-7)	Ave				, '			Ľ	, 			Ľ		70'0	_			_	_								ı.	,
	Result			_ '				Ľ	Ľ		,		<u>'</u>	2000		,	•	Ĺ	1					_		'		
SWS Bottoms (W- 20)	Ave.	00,20		260	_		3.40	_	-			3.60	_	0.4.10						3.80	3.10						6.00	'
	Ä	4.10		2.60	Ĺ		3.40			8,		3,60		4.10		3.60				3.80	3.10	3.00					88	'
SWS Bottoms (W-	Awe*	3,70	,			,	3.40		,	3,60		88	_	4.20		3.80	'	,		3.90	,	3.10	3.70				6.10	'
Sws B	Result	3,70	2.60	260	,		3.40	<u>'</u>		3.60		3.80		624	3.70	3.80				99	,	3.10	3,70	87	420	5.00	979	'
Laboratory		Halí Environmental	Half Environments	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Erwironmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Envtronmental	Hall Environmental	Hall Ewtronmentst	Hall Environmental	Hail Environmental	Ball Environmental	Hall Environmental						
DATE		11/10/2013						-					-				11/28/2013								_		12/26/2013	12/27/2013

Lab Report		1312057	1401138	1401363	1401507	1401682 1401683 1401684	1401811	1401980	1401A61 1401A62	1401CD0 1401CD1	1402076	1402233	1402324	1402512	1402624	1402814	1402815	1,402,904	1402A79	1402A78
Of Section 2	Mentilt	ı	'	,	-	'	•	•				•	,			'	•			
DAS Bindis. Brothwares 24	Nesult	1	'	,	1	'	•	•	•	,	,	,	,	,	1	'	, ,	,	•	,
MRC	Aire*		ı	1	1	1	•		•		,	,	,	1	,		7		,	,
Unit #34 MHC Cold Separator	Result	•	,					•	,	•		,	•			1	-	•	•	,
Unit 44 Overhead Sripper	Restutt	•	,	,	1	'	•	•	1	•	•	,	•	•	r				,	ı
Š, j	A PAGE					-	,	3	1	•		•	•	•	,	,	'	,	,	
Unit 845 Sour Water (M-2424)	Keeult		•		'	'	1	1	'	•		,	,				,		1	•
1.425	Result	,	, , , , , ,	,			•	,	1	,		,	•	•	•				,	,
Ĭ.	Ava	•	,		-	'	•	1	'	•	,	ı	,		,	,	,		1	1
Storm Tank (T-830)	Result					'	,	·,	1	•		•		•	•	,	•	1	1	1
Injection Wells	Result	0.33	0.23	0,29	15.0	977	0.51	0.23	0.49	120	95.0	0.40	0.20	•	0.20	-	-	820	-	-
Wahur Atter	Result	934	0.20	0.25	0.35	0.20	0.55	0750	15:0	0.29	0.66	0.43	77.0	,	•	,	•	•	1	1
75	Result	6.35	0.18	0.21	0.33	0.22	650	0.19	8570	<i>6</i> 20	990	0.45	0.28	40.10	0.22	'	•	0.28	ŧ	
7.805 F.	Result	76.0	0.17	0.14	0.34	0,18	0.55	0.18	0.43	920	970	577	0.28	,		,	,	,	•	,
95	Aue	0.38	950	•	8		17.0	27.0	1	0.47	0.66	1	•	•	,	· ·	,	•		
T-836	Result	0.88	95.0	,	1,00		17.0	0.72	•	0.47	9970	'	75.0	,		,	,	•		,
1-801	Ave.					0.64	•	f	51.0	,	-	0.50	'	٠	,	·	,	•		,
<u> </u>	Result	•		<u>'</u>		25.0	•	'	0.15		'	0.50	'	·	'			•	•	'
AP! Dutlet	Result	•			'		•		'	,	'	'	'	'	'	,	,	,	,	•
Aproblet	Ave	•		,	'	'	,	,	•	•	1	1	'	•		·	'			,
e de la constante de la consta	Result	•		,			•	•	•		1	1	'	•	,	'		•	•	
Desitor Outlet (D-2101)	Result	2.60	3.30	2.90	3.00	3.60	3.00	2.40	2,00	2.80	0.16	67.0	0.38	1	'		•	•	•	•
Desalter Outlet (D-130)	Result	1.80	3.20	1.20	1.50	2.20	2.50	170	140	2.20	2770	0.19	0.25				,	•	,	•
erubber >250)	Ave	15.00	0.19	17.00	18.00	0.17	0.10	60.0	10.00	9.40	17.00	15,00	0.14	'						1
Wet Gas Scrubber Purge (0-750)	Restat	15.00	610	17.00	18.00	0.17	0.10	6000	10.00	9.40	17.00	15.00	0.14	,	'	,	,	'	'	1
26. F	Result	•	,		•			, ,		•	,			0.83	977	1.30	1.70	170	3,	0.50
0.05F Eff.	Restuft	•	'	٠.	'	·		,	'	1	'	<u>'</u>	'	6.70	'		'	,	'	1
Series	Result	•	,	,			•	,	'	,	1	,	,	9	8.30	7,50	7.50	6.90	5.70	6.20
Despiter Effluent (W-7)	Assa*	,	'	'				,		,	,	'		9270	23		'	929	t	
	Result	•	'	'		'	'	,	'	'	,	1		85.0	1.20	,	'	35.0	,	•
SWS Bottoms (W. 20)	Ave.	5.70	6.00	28.8	5.70	4.30	\$.20	3.00	4.20	4.50	5.30	6.20	5.70	'	'	Ľ	'	'	'	'
	Result	5.70	6.00	5.80	5.70	4.50	\$20	5.00	4.20	8,	3,10	279	5.70		<u>'</u>	,	<u>'</u>	,	<u>'</u>	' '
SWS Bercoms (W- 634)	Ave*	3.50	5.80	05.2	2,40	4.50	5.50	4.30	18.4	4.30	2	6.30	5.70	,	,	·		•	'	'
SWS Ben	Result	3.90	8.3	5.90	5.40	4.50	5,50	4 gb	0£4	430	5.20	6.30	5,70	'	1	,	,	,	,	,
Laboratory		Hall Erwironmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Half Environmental	Hall Environmental	Hall Environmental	Hall Ervironmental	Hall Environmental	Hail Environmental	Hall Environmental	Hall Environmental	Kall Environmental	Hall Environmental	Hall Ervironmental
DATE		12/30/2013	1/6/2014	1/3/2014	1/13/2014	1/16/2014	1/20/2014	1/23/2014	1/27/2014	1/30/2014	2/3/2014	2/6/2014	2/10/2014	2/13/2014	2/17/2014	2/19/2014	2/20/2014	2/24/2014	2/26/2014	2/27/2014

Lab Report		1403030	1408250	1403248	1405331 1405332 1405333	1403558	1403561 1403562 1403559 1403563	1403702 1403703 1403704 1403705	1403872	1403870	1403966 1403967 1403968	1404085	1406935	1407271	1407A42	1408D15	1408F33	1410094	1411054
Polymet Solgest	Reente	•		•		•	'		,		'	1	,	,	•	•	۰	,	-
DAF EnalS Brotheres 24	Result	1	•	٠	,	•	,	,		•	'	'		•	1	•	,		1
t MHC serator	Ave	ì	,	,	,	•	•	,	•	,	1	'			,	,	1	1	ı
Unit #94 MHC Cold Separator	Result	•			٠.	•	•		•	•	,	, ,		•	•		•	•	,
Unit 44 Overhood Stripper	Result	•	,	•	'	•	,	-	4	•	,			•		•	,	,	•
Unit 245 Sour Water (W-2421)	AW	•	•		'	1			•	•	,	٠.	'	'	a	'	•	•	'
Unit of Ws (W-2	Result	1	•	•	-	1		•	•	•	,			,	'	'	,	-	,
2 <u>7</u> 2	Susuit	-	'		,	,	•	,	•	٠.	'		•	•	'	'	'	•	,
A G	Ake	1	1	1	•	1	,	1	•		•	,	•	•	•	,	-	-	•
Shorm Lank (T-830)	Result		-	-	•		•	-	-	•	,	,	•	-	-	,	-	-	,
Injection Welts	Result	0.14	,	,	0.046	•	0.079	0.052	-	'	0.150	0.076	40.10	<0.027	< 0.027	< 0.027	<0.027	950'0	0.10
Walnut Alter	Result	,	•			,	1	,	1	1			,	,	,	•	•	•	
¥ 5	Result	0.12		1	0.048	•	560°C	9.000	'	'		•	,		,	,	•	•	,
7.822 15	Result	1	,	0.082	2004	,	9000	980'0	,	'	,	,				,	•	•	·
us	Ave	•		· -			1		,	•					,	·		,	
1-896	Result	,	•	,	· ·		,	'		-					1		1	,	1
면	Ave*	•	,	,	ļ ·	•	•	'		·		'	'	ŀ	1	·	•	·	
T-801	Result	•				•	•	,	•	'	,	,	'			'	•	,	•
API	Result	-			,		,	,					,		•	'	-	1	·
<u> </u>	Ave	-	'				,	1	,	,		· ·	·		•	•	,	,	
WHALE	Result	-	1.	'			'	1	•		,		,	,	,		٠		,
Desiter Gudlet (D-2101)	Result	ı	,	-	-		'	'	1				,	,	,	1	,		•
December Outlet (0-130)	Result				,			1.	,	· ·	,								'
	· W	-	·				,				,		· · ·		ŕ		*		•
Wet Gas Sorubber Purge (D-250)	Result	,	'											,	,	,			,
Sext aff.	#und	250	명	0.52	0.23	82.0	0.36	61.0	97	뒴	8273	1	<u> </u>	1	1		•		
PA FE	Result	•		,	,		,	t	,	,	'	·		•		1	,		•
5 T	Result	8.	5.40	5,40	5.70	S.10	5.30	4.80	4.30	4.80	5.40		,		•	,	'	-	
emuent eg	Awe	0.24		,		-	78.0	920			0.25		,	'	,		1	•	1
Desalter Effluent (W-7)	Result	0.24		'		,	D.87	0.26	,	,	0.25	'	·	'		,	•	'	
ams (W-	Jan 1	,	'	'	'	r	,	1	•	,	'	,	· · ·	'	'	,	'	'	
SWS Bottoms (W- ZO)	Result	'	'					'	'		•	,		'	'	1	•	•	'
ems [W.	Aue*	ı	,	,	· ·			1	'	,	'	,	'	,	1		,		,
SWS Bottoms [W. G.4.)	Result		ļ '	·	'		'		'	'	,	'	,	'	1				,
Laboratory		Hail Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Half Environmental	Hálí Environmental	Half Environmental	Half Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental
DATE		3/3/2014 E	3/5/2014 E	3/6/2014 E	3/10/2014 E	3/12/2014	3/13/2024	3/17/2014	3/19/2014 E	3/20/2014	3/24/2014 E	4/1/2014	4 4101/61/9	4 1/3/2014 B	4502/22/F	8/25/2014	8/28/2014	10/7/2014	1/3/2014

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Design D			1417	1500
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Design D	Injection Wells	Result	0Z,0>	< 0.027
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Per Desilier Desilier Ania (Postati Result Result Result Result Control of the Co	PA API	-		
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oper o	Decalter Outlet (D-2000)	Result	•	'
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DATE Laboratory SNS Septems (W- SMS S		Result		
DATE Laboratory SNS Bertrans (W. Dean 20) 11/6/2014 Environmental 1.1/2/2015 Environmental 1.1/	oor Effluent (W-2)	Ave*		
DATE Laboration SYSS Besterons (NF 2013 besterons (NF 2013 20	. .	Result		<u> </u>
DATE Laboratory SYNS Bettomer (Mr. 59NS B. 115/6/2014 Emironmental 11/2/2015 Emironmental 1	ortoms (W-	**	<u>'</u>	
DATE Laboratory SYR Sections (N- SSQ) Mail	a 5345	Result		
DATE Laboratory SYNS a Reach Reach	attoms (W- 62-4)	*REF		
21/6/2015 Enfortmental 11/6/2015 Enfortmental 11/2/2015 Enfortmental	SHS	Result	'	_ '
11/6/2014 E	Laboratory		fall mironmental	talí nvironmental
	DATE		11/6/2014 E	1/2/2015 B

*Average of the split samples. If one result was not detected, the detected value is estimated to be the average.

Attachment E: Additional Total Selenium Monitoring Performed at the Navajo Refinery

	Lab Report		1310758	1310404	1310959	1310A71	13101021	1310B48	13101089	1310006	13101164	1310CS3 1310CS5	1310057	1310059	1310D18 1310D21	131,0078 97,001,21	H302620	1310522	H302639	1310E78 1310E81 1311035	H302652	1311033	H30Z670	1311082	1311209	1311209	1311286	1311362	1311362
	2 1	Result	1		•	1	,	,	7	,	,			1	,	·	•	•	1			•	•		,	7		0.001	-
	Unit #34 MHC Cold Separator	Result			•	•	1	-		•	ŧ	'	0.03	0.05	0.08	0.23	<0.0041 (ND)	0.25	2.67	0.14	2.99	0.37	292	1	1		1	1	-
	Unit 44 Overhead Stripper	Result	1	•	,	1	1	, 1	1	,	•			-	'		•		·	•	•	,	•	'	-	,	1	,	
	Unit #65 Sour Water (W-2421)	Result	•		•		,		-	•	,	500	6003	9702	900	90'0	10.0	50.0	2.15	g	2.51	0.30	2.58	7	1	-	'	,	1
	7 <u>2</u>	Result	,			•	1	1	1	-	•		· · · · · ·	-	'		•	•	•	,	•	1	1	7			1	1	┪
	Starm Trank (T-634)	Real			•	0.39	0.59	0.32	0.37	0.33	0.53	0.27	0.24	9770	021	8,	0.51	926	0.24	670	ধ্	82.0	277	,	1			1	╗
	Injection	Result	1.49			•	-	,	7		,		'	1	,	,	1	,		0.88	•	1	-	850	0.51		-		7
	Walout Filter Eff.	Restuit			•	,	,			•	,	1	'	1	,	•	'	,	,			1	1		,	Ť		1	
	ž ¥	Result	-	,	-	1	1			•	•	'	'	1	'	•	•	,	•		1	'			,		•		
	85 #2	Result			_		1		•	·	•			1			•			,		1		_	,	1	·	,	
į	7588	Aber.	•		850		67.0		0.82		0.85	1.00	710	2	0.85		100		0.92		0.996		0.97	99.0		700	108	0.59	96'0
	¥	Pestult		06.0	1.06	0.73	0.84	0.77	0.88	820	0.92	700	1.10	1.20	0.85	1.10	0.91	0.95	0.50	1.20	Q.73	1.10	0,85	99.0		1.00	1.00	550	0.96
	T- <u>800</u>	Ave.			0.95	•	0.90	Ь,	0.90		1.01	0.92	150	1.10	160		27.0		0.80		0.93		5,73	1.10	0.84		1.30	0.91	_
		Restult		78.0	1.02	0.87	0.93	0.28	0.92	ğ	177	250	93	7	P.0	0.84	0.63	850	0.61	1,20	0.65	0.97	0.62	1.10	20.0		1,10	0.91	_
	Odder Odder	Result					-		, a	ġ					<u>'</u>		· .			,				0.10			0.13		913
	APHiles	Age				el	9 0.35		2 0.42		1.67	120	0.34	25	5 0.05	10	1 0.15	-1	9 0.11		0.06		3 0.32				-	77	_
_	a	Result				0.31	0.39	0.33	0.52	11	1.83	1.20	0.94	0.54	0.05	0.1	40.041 1.(ND)	TO	(ND)	0.0	8 (N)	0.31	- E					77	_
	Desetor Order (D-2101)	Result	,		ĺ	j		ĺ		ľ	Ĺ	·					,	ľ	ľ			Í	_						
	Desafter Outlet (D-130)	Result	•	-	'	•	٠	•	1		,		'	,	1	•		1	1	ŧ	. '	'	•	'	•	1		,	
	Wet Gas Scrubber Purge (D-250)	Abre.	•		0.23		0.10		0.13		0.09	5.10	8.70	9.50	6.60		4.39		6.82		2.87		4.63	1	1	_	,	'	_
	Mary 6	Result		0.21	0.25	0.07	0.13	0.10	0.16	0.07	0.10	5.10	8.70	9.50	6,50	3.40	5.38	5.40	23	1.50	424	3.90	5.36		'	'	,		
- A	Sect.	Result			_ '				_				. '	'		,		'	,		ľ	,							
	Serit.	Result				'			_				<u>'</u>			'				'				_			_		<u> </u>
	Desira Effluent (W-7)	h Ave"		٦	1.69	~	1,00		4 0.56			3 0.13		7 0.27	8000	7.1	2 0.22		1 0.15		2 0.36	انہ	020	-			_	_	_
-		Result		8.1	1.88	0.62	0.79	0.58	45.0			0.13	0.32	0 0.27	80.0	0.22			- 0.21 - 0.21			0.21	0.18	_	1		þ	0	9
	SWS Bottoms [W-20]	dt Am*	- 4	-	- 1		_		-		,	130	230	240	230	9	17 2.39	_	236		79 77 78	او	27	2,40	,		200	28	
_		a* Bastdt			4.62		1.39	\sqcup	- F		 Ž	1.60	220	2.50 2.40	240 2.30	2.30	2.06 2.47		227 72.52		2.53 2.98	2.00	1.83 2.53	2.10 2.40		. ,	2.10 2.00	130 1.80	1.90 1.70
	SWS Bottoms (W-634)	Result Ave*		4.30	5.14 4.	0.47	231	ļ. ,	2.50	230	_	1.60	77 027	2.50 2.	2.40	2.20			2.14 2.		286 2	1.70		2.10 2.			2.10 2.	1.50	
5	Saboratory	1	ALS Environmental					Hall Environmental 2	_					Hall Eovironmental 2	Hall Environmental 2		Cardinal Laboratories 1				Cardinal Laboratories 2				Tronmental	Hall Erwironmental		Hall Environmental	
The individual description of the state of t	DATE 1		10/15/2013 ALS	10/20/2013 Env		10/22/2013 Env	10/22/2013 Envi	_	10/23/2013 Env	10/24/2013 Env		10/25/2013 Env	_	10/27/2013 Env	Hall 10/28/2013 Etw	10/29/2013 Env			10/30/2013 Lab		Can 10/31/2013 Lab				Hall 11/5/2013 Env			11/8/2013 Env	

Lab Report		1311963	1311402	M3259	1311625	1371693	131,1694	1311743	131,1802	1311893	1311970	131,1438	1311A50	1311806	1311806	1311834	131,1896	13111899	1311,000	1312001	1312046	1312228	1312315	1312548	1312685	1312960	1312B14 1312B16	1312862	1312CM	1312057
2 ti	Result	,	'	-		,		'		-	_	•	_	•		,	1	-		·				•		,	-			-
Unit #34 MHC Cold Separator	Besuft	,	'	-		•		,	,	•	•	•	•	,	'	,	'	1		•		•	•	•		'	1	ŀ		, i
Unit 44 Overhead Stripper	Result	- ,	_	-	٠,	_	-	b.	٠.	_		-	•		170	ı	1	1	,	,		'	,	٠		·	1			
Unit 845 Sout Water (Ne. 2023)	Result	ı	_	-	-	,	-		,	•			•	•	2.20	1		1	-	•	,			,		•	-	,		
, , , , , , , , , , , , , , , , , , ,	Read	-	860] -		_	_			-	-	1	,	,		'	1	•	1	-	-		820	0.39	0.37	0.43	0.41	0.33	-	\dashv
Storm Track [7-530]	T T	ŀ	0.22	-						_		-		_	,	64.0	,		'	•		,	85	0.39	0.37	0.43	0.41	0.33	\exists	\exists
Medic	Result		80.0	,	•	80.0	0.88	629	0.87	9.64	65.68	0.78	0.22	0.67	0.59	0.66	0.61	0.68	0.64	0.70	0.77	0.52	0.37	0.55	870	0.24	0.27	0.38	950	0.33
Walnut After	Result	-	<u> </u>	-,		,	,	,		•	-	1	•	,	1	i						•		-		-	٠.		0.37	0.43
35	in in in in in in in in in in in in in i	<u> </u>		•	-	-		,		,	•	,	,	1	1	- 1			-	•	•			1		·	1	'	0.38	90
7.80S	Perut.			•	•		,	1	٠,			,	_		1			٠,	-	•	'		٠,	1		•	•	'	110	168
*	¥	87	56.0	1.37	1.1D			0.72			99.0	•		-	0.66	_	•	7	_	_	0.BZ	,	,	,	'	,	110	-	_	0.88
\$2. \$3.	Result	1.20	0.95	137	1.10			0.72	Ť	•	0.66	,		_	0.66		•	•	'	•	280	•	•	1	,	'	1,10	-	•	0.88
7404	Ave*	•		•	•	,	1	•	1	•	0.63	,	٠	-	1	•		-		'	0.63	1	1	1	•	660	,	1.30	,	
7	Result	,	•		-			•	,		0.65	'		-	0.50	•		•	'	'	0.63	'	,	ι	'	960	•	1.30		,
P. A.P.	Result	21.0	0.14	Ľ	0.15	•	·	0.43	,	•	0.36	'	'		950	,	'	•	'	. '	0.37	'				'		•		
API-inlet	Aus.	,	'	ľ	<u></u>		,	•	•				_		'			_ '			'	'				•	1		•	,
Ŕ	Result	,	1	,	1	١	ʻ	ľ	•	•		'		•	'		•	•	Í	'	'	'	t	'		'	,		•	.
Desilter Outles (D-2101)	Result		,		-	'	,					•	-	,		•		•	'		-	0.67	2,20	0.51	2.50	170	230	3.00		230
Desiter Outlet (D-(30))	Result			i	-		-		•	1			-	•	-	•	•		_	,	'	72.0	25.	0.44	1.80	1.50	3	2.60	-	760
20 E	şa Ç	,	'	,	1		•			-	1	-	-	•		7.30		,	1	•	7.50	0.35	9.30	11.00	9.40	6.40	14.00	3.00	. ; I	7.30
Wet Gas Scrubber Purge {D-250}	Result		'	,	·	•		•	•		-	-	•	•	•	06.7		-	1		7.50	0.36	9.90	11.00	9.40	6.40	14.00	3.00	, '	7.30
Self.	Result		-	-	•		,	•	,	-		-	,	•	•	•	3		r	•				•		•	•	,	,	
P. Selft Bed AT	Result	'	,		•	٠	,	,	,	-		·		•	•	Ť	,	·		•	,			•		,			'	'
Desaiter Effluent (W-7)	Ave.		١	ľ	_			1		_	_	_		_	1.30	_				•			•	_	,	<u>'</u>	'	,	_	L.
- See	Result	'			L.	_		·	-			L		a	06.1		1	-	_'	_ '	- !	,	,	_	-	- 1	•	'	Ľ	·
SW5 bottons (W-20)	Ame	87	<u> </u>	L.	1,60		. '	2.80	-	,	3.30	\perp	110	,	3.10		2.80			,	3.20	230		3.40	4.20	3.90	4.60	7. 2.7d	Ľ	8.9
swa n	Result	_		Ĺ.	1760		'	2.80		,	3.30		110	,	9,10		2.80				3.20	230	3.10	3.40	4.20		97	5.70	Ľ	5.30
SWS Bettems (W-634)	A Asset			⊢	180	_		0,70			3.30		58.0	_	OE.E		2.90				3.20		3.00	3.70	1 4.20	3,90	4.80	5.80	1	3.90
SAG C	Result	_		-	1.60			2.70			3.30		0.86		3.30		2.90				3.20		3,00	3.70	4.20		4.80	1 5.80		3.6
Laboratory		Hall	Hail Environmental	CHZM HILL ASI	Hail Environmental	Hall Environmental	Hall Environmental	Hall Ervironmental	Hall Environmental	Hali Environmental	Hall Environmentai	Hall Environmental	Hall Environmental	Half Environmental	Half	Hall Environmental	Hall Environmental	Half Environmental	Hall Environmental	Hall Environmental			Hall Ervironmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental		Hall Erwironmental
DATE		11/10/2013	11/11/2013	11/12/2013	11/14/2013	11/16/2013	13/17/2013	11/18/2013	11/19/2013	11/20/2013	11/21/2013	11/22/2013	11/23/2013	11/24/2013	11/25/2013	11/26/2013	11/27/2013	11/28/2013	11/29/2013	11/30/2013	27/2/2013	12/5/2013	£102/8/21	12/12/2013	12/16/2013	12/19/2013	12/23/2013	12/26/2013	12/27/2013	12/30/2013

Lab Report		1401126	1401363	1401507	1401682 1401683 1401684	1401811	1401980	1401A61 1401A52	1401000	1402076	1402233	1402326 1402324 1402325	1402490	1402512	1402613 1402624 1402626	1,402,814	1402815	1402902 1402903 1402904	1402479	1402A78	1403030	1403250	1403248 1403249	1403331 1403333	1403558	1403561 1403562 1403559	1403563
요참	Passult		,	,		•	-	,	,	1		- 1	,	•	•	•	,	,	-	'	•	1	•	1	,		•
Unit #34 Meri cold Separator	Bassuit	•	,	,		•		Ī	-	'	•	,	,	•	•	•	,	,		•		'	•	·	,		•
Unit 44 Overhead Stripper	Result		·			,	ì	,	·			,	,	•	,	1	٠	1	•	•	,	1	·	1	,		
Unit #45 Sear Water (WcAct)	Result	1							,	,	•	•	•	1	,		-	P	•	,	,	,	,	•			
	Result	ź	,			-	,	-	,	1	ŧ		•	-					,		 ,		_	,	-		╣
Storm Tenk [7-830]	Result	,				•		_	,	1	,			,	•					,			_		1		_
Mels	Pearsit	030	6,43	55.0	0.26	150	23	25.0	7,20	990	0.42	970	,	4	0.20			0.20		•	0.12	•		0.067			0.091
Waleut Fitter	Result	72.0	0.43	0.37	R	0.54	Ŋ	0.51	6.23	650	27'0	0.24	,	-	,	-				•	-	•	,	ı			-
F	Reput	15	0.42	0.41	82,0	Ę,	0.24	0.55	0.30	0.50	0.45	0.26		0.087	220	_	_	0.20			2170	1	,	0.067			0.095
25.5	Result	1.20	180	2,10	87	1.00	8,	120	86.0	1.10	1.30	0.58		-		1	-	-	-	-	1		624	0.16		-	0.17
<u> </u>	Awe	100	·	170		160	99.0		18.0	1.20		96.0	•	- 1		,	•	-	•	•	,	,	,	,			-
1-896	Result	1.00		179	•	1,60	99.0		0.81	1.20	•	0.36		-		'	,		,	,	'	,	1	•	,		•
7-801	Ave	-	'	'	3.70	•	·	0 <u>5</u> 1	•	•	1.00	·	,	1	•	,	,	•	,	-	'	,	'	·	,		•
ž	Result	'	'		5.5		,	1.30	,		1.00	·	,	_			,	,	•	1	•	,	'	,	'		•
Outlet table	Result		'			'	'	,	Ĺ				'	-	,					-	'	,	'	'	'		•
APHILIE	Ave		'	L.	•				,	'				-	,		'	,	-	_		L'		'	Ľ		
₹	Result	1		'	,		ı'	٢	'	·		'			,I		,	'		,	'	')	'	ľ		'
Desaiter ounder [0-2101]	Result	4.30	2.30	2.70	3.40	2.90	2.20	2:00	3.20	61.0	0.28	0.45	,	T.	1		•	,		'	,		,	, 	ı.		,
Desites outlet (D-130)	Result	3.00	200	1.10	2.30	2.50	1.70	1.80	97	67.0	81.0	570		t	-			,	•	1	•	•	1.	'	,		,
Ges r Punge SO}	Ave	<0.45	16.00	18.00	8.8	2,5	27.0	17.00	9.50	15.00	15.00	0.048	'	·		·	·		•	-	·	,	-	,	,		•
Wet Gas Serubber Punge (D-250)	Result	<0.45	16.00	33.00	\$.00	6.50	6.22	17.00	950	16.00	36.00	0.048		•	'	,	•	,	-	-	,	,	'	,	,		•
24	Recult	•		'		'	'	'	'	ľ	'	DEG	970	180	2	2	34.	8	35.1	0,46	0.49	38.0	4.	61.0	0.21		0.14
Self.	Na st	L'	Ľ,	'	,			,		Ľ	'	520	59	6.00	83	7.20	2.00		9.60	5.80	_	5.70	5.40	5.30	5.20		5.00
Desaithe (ffluent (W-7)	Aver				,		· 				'		,	0.55	5	Ľ.	'	1 2	'		0.81				<u>'</u>		0.84
	Result		'		<u> </u>	<u> </u>	Ľ	'	Ľ	,	'			0.55	1		'	820		L'	150	<u>'</u>	'	<u>'</u>	<u> </u>		0.84
SWS Bottoms (W-20)	ilt Aver	07.0	_	-					05.4	5.00 5.00	30 5.90	5.70 5.70		-	'	<u>.</u>	'	'	'		<u> </u>	<u>'</u>	<u> </u>		ļ .		_
	r. Result	5.70	_	1	1	_			02.4		22 5.30					,				,		ļ ,	ļ.,	,			_
SWS Bottoms (PF-63-4)	Sesult Ave"	5.40 5.40						_	4.20 4.20	5.40 5.40	5.70	ļ		,						,					ļ		
Laboratory	ä	Hall Environmental 5	1	Hall Erwironmental 4			_	l.			Hall Environmental S	L		Hall Environmental	Half Environmental	Hall Environmental	Hall Environmental	Halí Ervironmental	Halí Environmental	Half	Hall	Hall Environmental	Hall Environmental	Hall	Hall Environmental	100	Environmental
DATE		1/6/2014		1/13/2014		_										•			2/26/2014				_				3/13/2014

Lab Seport		3403702 1403703 1403704 1403705	1403872	1403870	1403966 3,403967 1403968	140SB40	1409CS0	1404085	1404180	1404270	1404505	1404611	1404826	1404884	1404A30	1404838	1405036	1405142	1405348	1405453	1405688	1405784	1405983	1405803	1405046	1405018	1406247
St. St. St. St. St. St. St. St. St. St.	Passadt					•	-		,	•	•	-	-	,	•	,	•		- ,								_
Unit #34 Nefc told Separator	Rescute	,	,		,	-		•	_	•		1		,	•	-	•	•	-	-	,		•	,	-		_
Unit 44 Overhead N	Result	,				,	1	,	,			,		,	•	•	•		···;		,		•	٠.		-	
Celt #45 Seur Water (Nexect)	Restuft	,	,	•		,	-	•	-		•	1	-	•			•	-			•	1	-	-,	-	•	-
35	Report R		H	-		-	-	•	,	,	,	-	,	· ,		,		,	٠,	1	•	1	•		'	•	-
Starm Teach (T-430)	Result		-	-			-	•	•	,		,	-		1	,	,	1	_	_,	'	ı	٠,	_,		,	-
injection Welk	Result	1887		•	g	,	•	9:026		•			•	•	-	,	,	_	,	_,	_	•	•	,	-,	,	-
Walnut Filter Eff.	Result			•	,	1	•				1		-	•			•	-	,	-		-			•	,	
## ## ## ## ## ## ## ## ## ## ## ## ##		960'0		•	1	1	-	•	•	•	,	•	•	•	-				•	:			,			•	
T-805	Result	87.9	-	•	1	•	•	•			,	-	•	'	1	•	,	-	,	·	'		•	,		,	
34557	AW.	-		•	'	,	•	•	'	•	1	-		'	-	ı	'		•		'		'	•	,	•	'
ž.	Age at the state of the state o	'	,	•	'		•		'		1										'		'	1			
7-401	It Ave	,	'		'	-	•	1			-			,	'	-					'		-				4
APT Outlet	Result Result	,	٠.	,	 ,	-	•	-	,		-	-		1	1	-			-	,		-	-	-	-	-	-
- ₹8	Abres Res		-		ļ,							•	-			,	-	_		'	-	_	-	•		1	-
APHnica	Result		:				•	-			-	-		1	•	,	-	•	•	'	-	,	-	-	•	ŀ	╗
Desaiter Ouder (D-2101)	Result						•	t	,	•	-			'	•	-	1	,		-	•		-	•	-	-	
Dessiter Outlee (D-330)	Mesuit	1	i -	,		,	*	•	,	1		•	•	,	•					•		•					•
Bass r Purpe Sol	Age.	-	·	·	٠.	<u> </u>	•		,	-	٠	1	•	'	-	1	•	,	•	•	,	•	-	•	-	•	•
seb taw Served and durant (025-0)	Nexul	ı	·	,	-	,	,	,	•	-	,	•	•	'	-	•	•	,	•	•	•	,	,	•	-	'	·
SeRT.	Result	4.0	21.0	Ħ	270		0.15		0.12	0.13	0.14	0.16	0.14	6.13	52.0	0.13	880'0		0.052	0.074	0.058	0.095	0.15	7200	0.11	0.073	0.085
Sent Fred	Result	4.40	3.90	4.40		3,90	4.40		3.60	4.70	4,10	3.90	4.00	3.00	3.5	3.40	3.50		3.20	3.40	3.60	3.40	2.80	2.50	3.20	3.30	979
Desiter Effluens (W-7)	t Awe'	89			1970	-				-	· 	•				'			· ·	'	'		- '				_
	Result	030	1	1	1910	,		-	1.	r	_											- 1	_				
SWS Bottoms (W-20)	Result Ave	,	,	1	-	,	,	1	-			-							-		-	_	-	_			
	Ave. Re		,		<u> </u>	٠,		1.			,	,	-	٠.	-	,				- -			 -				
SWS Bottoms {W-634}	Result				'	٠	,			-	ŀ	•	ı.	•	-	'	,	,			_		,	1			-
Leboratory		Hall Ervironmentai	Hall Environmental	Hall Environmental	Hall Ervirgnmental	Hall Environmental	Hali Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hail Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental		Hall Environmental	Hall Environmental	Hall Environmental	Hail Environmental	Hall Envisoimental	Hall Environmental	Hall Environmental	Hall Environmental	Hall Environmental
DATE		3/17/2014	3/19/2014	3/20/2024			3/31/2014		4/3/2014		4/10/2014	4/14/2014	4/17/2014	4/21/2014			5/1/2014	\$/5/2004	5/8/2014	5/12/2014	5/15/2014	5/19/2014	5/22/2014	5/27/2014		6/2/2014	6/5/2014

Lib Report		1406376	1406576	1406694	1406934	1406A48	1406C44	1407055	1407222	1407272	1407494	1407602	1407867	1407986	1407014	1407022	1408014	1408159	1408413	1408469	1408846	1408870	1408014	1408725	1409074	1409240	1409352	1409592
8 8	Result	ļ ,	'		,	,	-	-				·	,	,		1	,	,	1	·		'	,	,		-	,	
Unit #34 MHCCold Separator	Result		'	·		'	,	,		1		Ī	'	•	•	1	,	,	1	,	,	'		'	'	-	1	,
Unk44 Overhead Stripper	Result				,					1		,	'				,	,	1	•		-	-	-	-	-		
		Н.	-	-	,		,	-		,	,		,		,		<u> </u>	<u> </u>	,		-,	,	,			-	7	,
Linit #65 Sour Water (W-2/023)	The Person		ļ.,	ļ.,		<u> </u>	ı	,		1	,	 ,			,			,					<u> </u>		-		-	
E * 8	Result Result	+		ļ.,		-	-	<u> </u>		1	,	 ,	-			,	-						-	١.		•	1	-
Storm 2 Storm		┼.	,	١,	8			ļ ,	2000		-	-	1	ļ				,	- 1	,			83	2		-	_	
Intention Wells	Sec.	 	<u> </u>	<u> </u>	0.069	L.		,	å		ļ			-			L.	_					0.018	- 40.014	_	-		
Walteut Pitcer Cife	Result	-	Ľ	Ĺ	·	ļ					·		,			Ľ	Ċ	ġ		Ĺ		'	Ľ					
A F	Result	_	<u> </u>	Ľ	<u>'</u>	<u> </u>				<u> </u>	,	<u> </u>		'	<u>'</u>	<u>'</u>	Ľ	<u>'</u>			· -		L,		'	-		
14. 26.	Result	 	ļ.,		<u> </u>	L					<u> </u>			·	1			<u> </u>					Ľ	Ľ	<u> </u>			
7-636	uk Ave	-	 	-	 	<u> </u>	-	<u> </u>		<u> </u>				,		- 1		-		-	-							
	Ave* Stauk	┼	-	-		 ,	,	 		ı	ļ		,			-	-	<u> </u>	-	-			١.	,				۰,
74801	Result	1-			١.	ļ		 ,			,	-	,	,	,	,						<u> </u>			-	- ,	.,	,
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Chavez, Carl J, EMNRD

From: Stone, Brian < Brian.Stone@HollyFrontier.com>

Sent: Tuesday, January 13, 2015 11:11 AM

To: Dawson, Scott, EMNRD; Chavez, Carl J, EMNRD

Cc: Holder, Mike; Coons, Christina (Christie)

Subject:1/2/2015 Effluent Se ResultsAttachments:Rpt_1501149_Final_v1.pdf

Scott/Carl – attached are the effluent selenium results for January 2, 2015.

For 1/2/15:

Total Effluent Se = 0.029 mg/L

TCLP Effluent Se = ND mg/L

Selenium sampling is conducted on a quarterly basis on the first business day of the quarter per Exhibit A Condition 1(c) to the Amended and Supplemented Order dated November 14, 2013 The next scheduled sampling date will be Wednesday, April 1, 2015. Please let me know if you have a different interpretation or if you have any questions or comments. Thanks again for your assistance in this matter.

Brian Stone
Environmental Specialist
Navajo Refining Company, L.L.C.
501 E Main Street
Artesia, NM 88210
(575) 746-5294 (office)
(575) 308-1511 (cell)

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Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87109 TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

January 12, 2015

Mike Holder Navajo Refining Company P.O. Box 159 Artesia, NM 88211-0159

TEL: (575) 748-3311

FAX

RE: Quarterly WW Effluent Monitoring OrderNo.: 1501149

Dear Mike Holder:

Hall Environmental Analysis Laboratory received 1 sample(s) on 1/7/2015 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0190

Sincerely,

Andy Freeman

Laboratory Manager

andyl

4901 Hawkins NE

Albuquerque, NM 87109

Analytical ReportLab Order **1501149**

Date Reported: 1/12/2015

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Navajo Refining Company

Project:

Lab ID:

Client Sample ID: Effluent to Wells (location #6)

Quarterly WW Effluent Monitoring Collection Date: 1/2/2015 8:30:00 AM 1501149-001 Matrix: AQUEOUS Received Date: 1/7/2015 9:45:00 AM

Analyses	Result	MDL	RL	Qual	Units	DF	Date Analyzed	Batch ID
EPA METHOD 6010B: TCLP METALS							Analyst: ELS	
Selenium	ND	0.027	0.050		mg/L	1	1/8/2015 6:21:27 AM	17109
EPA 6010B: TOTAL METALS							Analyst: ELS	
Selenium	0.029	0.014	0.050	J	mg/L	1	1/8/2015 6:19:37 AM	17109

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.

RL Reporting Detection Limit

Page 1 of 3

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1501149**

12-Jan-15

Client: Navajo Refining Company

Project: Quarterly WW Effluent Monitoring

Sample ID MB-17109 SampType: MBLK TestCode: EPA Method 6010B: TCLP Metals

Client ID: **PBW** Batch ID: **17109** RunNo: **23522**

Prep Date: 1/7/2015 Analysis Date: 1/8/2015 SeqNo: 694945 Units: mg/L

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Selenium ND 1.0

Sample ID LCS-17109 SampType: LCS TestCode: EPA Method 6010B: TCLP Metals

Client ID: LCSW Batch ID: 17109 RunNo: 23522

Prep Date: 1/7/2015 Analysis Date: 1/8/2015 SeqNo: 694946 Units: mg/L

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual Selenium 0.48 1.0 0.5000 0 95.3 80 120 J

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.
- RL Reporting Detection Limit

Page 2 of 3

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **1501149**

12-Jan-15

Client: Navajo Refining Company

Project: Quarterly WW Effluent Monitoring

Sample ID MB-17109 SampType: MBLK TestCode: EPA 6010B: Total Metals

Client ID: **PBW** Batch ID: **17109** RunNo: **23522**

Prep Date: 1/7/2015 Analysis Date: 1/8/2015 SeqNo: 694914 Units: mg/L

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Selenium ND 0.050

Sample ID LCS-17109 SampType: LCS TestCode: EPA 6010B: Total Metals

Client ID: LCSW Batch ID: 17109 RunNo: 23522

Prep Date: 1/7/2015 Analysis Date: 1/8/2015 SeqNo: 694915 Units: mg/L

Analyte Result PQL SPK value SPK Ref Val %REC LowLimit HighLimit %RPD RPDLimit Qual

Selenium 0.48 0.050 0.5000 0 95.3 80 120

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- E Value above quantitation range
- J Analyte detected below quantitation limits
- O RSD is greater than RSDlimit
- R RPD outside accepted recovery limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- P Sample pH greater than 2.
- RL Reporting Detection Limit

Page 3 of 3



Hall Environmental Analysis Laboratory 4901 Hawkins NE Albuquerque, NM 87105

TEL: 505-345-3975 FAX: 505-345-4107 Website: www.hallenvironmental.com

Sample Log-In Check List

Client Name: NAVAJO REFINING COM Work Order Number:	1501149		RcptNo:	1
Received by/date: 6107115				
Logged By: Lindsay Mangin 1/7/2015 9:45:00 AM		Judy Hays		
Completed By: Lindsay (Mangin 1/7/2015 10:26:15 AM		Judy Hlogo		
Reviewed By: 01/07/1	5			
Chain of Custody				
Custody seals intact on sample bottles?	Yes 🗹	No 🗌	Not Present	
2. Is Chain of Custody complete?	Yes 🗸	No 🗌	Not Present	
3. How was the sample delivered?	<u>FedEx</u>			
<u>Log In</u>				
4. Was an attempt made to cool the samples?	Yes 🗸	No 🗌	NA \square	
5. Were all samples received at a temperature of >0° C to 6.0°C	Yes 🔽	No 🗆	NA \square	
6. Sample(s) in proper container(s)?	Yes 🗹	No 🗆		
7. Sufficient sample volume for indicated test(s)?	Yes 🗸	No 🗆		
8. Are samples (except VOA and ONG) properly preserved?	Yes 🗹	No 🗆		
9. Was preservative added to bottles?	Yes 🗌	No 🗹	NA 🗆	
10,VOA vials have zero headspace?	Yes \square	No 🗆	No VOA Vials 🗹	
11. Were any sample containers received broken?	Yes	No 🗹	# of preserved	
			bottles checked	1
12.Does paperwork match bottle labels?	Yes 🗹	No □	for pH:	r >12 unless noted
(Note discrepancies on chain of custody) 13. Are matrices correctly identified on Chain of Custody?	Yes 🗹	No 🗆	Adjusted?	no
14. Is it clear what analyses were requested?	Yes 🗹	No 🗆		A
15. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes 🗹	No 🗆	Checked by:	<u> </u>
On a stall the welling (if a multiplie)				
Special Handling (if applicable) 16. Was client notified of all discrepancies with this order?	Yes 🗌	No 🗆	NA 🗹	
Marie Control of the				
Person Notified: Date:		Phone Fax	☐ In Person	
By Whom: Via:	eMail	_ Fliotie rax		
Regarding: Client Instructions:				
17. Additional remarks:				
18. Cooler Information Cooler No Temp °C Condition Seal Intact Seal No	Seal Date	Signed By	[

Chain-	of-Cus	Chain-of-Custody Record	,	7	ANALYSIS LABORATORY	ATORY
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		<u>a</u>	Project Name:		www.namerivingingingingingingingingingingingingingi	6
Mailing Address: P.O. Box 159 Artesia	.O. Box 15		Quarterly WW Effluent Monitoring Project #: P.O. # 167796	itoring	Tel. 505-345-3975 Fax 505-345-4107	
NM 88211-0159					Analysis Kequest	
Phone #: 575-748-3311	3311		Project Manager:	807		
email or Fax#: 575-746-5451	-746-5451		and Lolder / Dan Crawford			
Standard	### P	□ Level 4 (Full Validation)	Sampler	ON		
□ EDD (Type)			ure.	J.001		
Date Time	Matrix	Sample Request ID	Container Preservative Type and Type	HEALNO.	Total Se	
08:30	Liquid	Effluent to Wells (location #6) Effluent to Wells (location #6)	1 Plastic HNO3 1 Plastic Neat	98	×	
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r	-					Joseph Company
Date: Time 1/3/15 1/3	Time: Relinqui	Relinquished by: James Potts	Received by:	Date Time	Remarks: Required to test on the first business uay or commonth.	cay of
Date: Time:		Relinquished by:	Received by:		(2) TCLP 1311/6010	analytical report.
			and to other accredited labora	dories. This serves as notice of t	an other accredited laboratorias. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical representations of the second of the seco	andytear open.