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March 31, 2026

New Mexico Energy, Minerals and Natural Resources Department  
New Mexico Oil Conservation Division  
Attn: Robert Hamlet  
811 South First Street  
Artesia, New Mexico, 88210

**Re: 2025 Operation and Maintenance Annual Report – Soil Vapor Extraction System; Holly Energy Partners – Operating, L.P.; Former Tank 970 / Artesia Station West, Eddy County, New Mexico; NMOCD Incident No. nCE2003752717 (Incident Date January 22, 2020)**

<b>Project Information</b>
<b>Responsible Party:</b> Holly Energy Partners – Operating, L.P.
<b>HEP Contact Info:</b> Paul Richardson, 918.345.2036, Paul.Richardson@HFSinclair.com
<b>Consultant Contact Info:</b> TRC Environmental Corporation, Marianne Link, 919.943.2631,mlink@trccompanies.com
<b>Site Name:</b> Former Tank 970 / Artesia Station West
<b>API Number:</b> Not Applicable
<b>NMSLO Lease No.:</b> BL-2073 dated October 23, 2018
<b>NMOCD Incident No.:</b> nCE2003752717
<b>PLSS:</b> Unit G, Section 28, Township 18S, Range 28E
<b>County:</b> Eddy County, New Mexico
<b>Latitude and Longitude:</b> 32.71917, -104.18119

Dear Mr. Hamlet:

On behalf of Holly Energy Partners – Operating, L.P. (HEP), TRC Environmental Corporation (TRC) is pleased to submit the *2025 Operations and Maintenance Report – Soil Vapor Extraction System* (Report) for the Former Tank 970/Artesia Station West (Site) located on County Road 229 (also known as Depco Rd) southeast of Artesia, Eddy County, New Mexico. This Report summarizes the SVE system installation, operation and maintenance (O&M), and performance monitoring activities performed at the Site in 2025. The Report was prepared in accordance with the November 2023 *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report* (Recommendation Report).

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March 31, 2026

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If you should have any questions or comments regarding the Report, please contact Paul Richardson of HF Sinclair at (575) 308-1115 or Bryan Gilbert of TRC at (925) 699-6184.

Sincerely,



Marianne L. Link, PG  
Senior Project Manager



Bryan Gilbert, PG  
Area Leader – Central Texas | El Paso

**Attachment:** *2025 Operations and Maintenance Annual Report – Soil Vapor Extraction System*

cc: Paul Richardson, HF Sinclair, Tulsa, Oklahoma  
Jason Leik, HF Sinclair, Dallas, Texas  
Melanie Nolan, HF Sinclair, Artesia, New Mexico  
New Mexico State Land Office Environmental Conservation Office (via email)

# 2025 OPERATION AND MAINTENANCE ANNUAL REPORT – SOIL VAPOR EXTRACTION SYSTEM

Former Tank 970/Artesia Station West  
NMOCD Incident No. nCE2003752717  
Eddy County, New Mexico

**Prepared For:**

Holly Energy Partners – Operating, L.P.  
2323 Victory Avenue  
Suite 1400  
Dallas, Texas

**Prepared By:**

TRC Environmental Corporation  
505 East Huntland Drive  
Suite 250  
Austin, Texas

March 31, 2026



# 2025 Operation and Maintenance Annual Report – Soil Vapor Extraction System

Former Tank 970/Artesia Station West  
Eddy County, New Mexico

Prepared for:

Holly Energy Partners – Operating, L.P.  
Dallas, Texas



Prepared by:

TRC Environmental Corporation  
Austin, Texas



TRC Project No. 000705860

March 31, 2026



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Marianne L. Link, PG  
Project Manager



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Bryan Gilbert, PG,  
Area Leader – Central Texas |  
El Paso

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## ACRONYM LIST

<b>Notation</b>	<b>Definition</b>
%	percentage
AcuVac	AcuVac Remediation
bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene, and xylenes
cfm	cubic feet per minute
COC	contaminants of concern
CPP	Cultural Properties Protection
DRO	diesel range organics
ECO	Environmental Compliance Office
GPR	ground penetrating radar
GRO	gasoline range organics
HDPE	high-density polyethylene
in WC	inches of water column
mg/kg	milligrams per kilogram
HEP	Holly Energy Partners – Operating, L.P.
MRO	motor oil range organics
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMOCD	New Mexico Oil Conservation Division
NMSLO	New Mexico State Land Office
NOI	Air Quality Bureau Notice of Intent
O&M	operation and maintenance
PID	photoionization detector
ppbv	parts per billion by volume
ppm	parts per million
ppmv	parts per million by volume
PVC	polyvinyl chloride

<b>Notation</b>	<b>Definition</b>
ROI	radius of influence
scfm	standard cubic feet per minute
Site	HEP Former Tank 970/Artesia Station West
SVE	soil vapor extraction
TO	Toxic Organics
TPH	total petroleum hydrocarbons
TRC	TRC Environmental Corporation



## 1.0 INTRODUCTION

TRC Environmental Corporation (TRC) has prepared this *2025 Annual Operation and Maintenance (O&M) Report - Soil Vapor Extraction (SVE) System* (Report) on behalf of Holly Energy Partners – Operating, L.P. (HEP). This document was prepared to summarize the installation, O&M, and performance monitoring activities performed from March through November 2025 at the Former Tank 970/Artesia Station West (Site). These activities were conducted in accordance with the November 2023 *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report* (Recommendation Report [TRC 2023]), which was conditionally approved by New Mexico Oil Conservation Division (NMOCD) on October 2, 2024, with the caveat that additional SVE wells and confirmation soil sampling may be needed based on the SVE O&M data.

The Site is located on County Road 229 (also known as Depco Road) approximately 15 miles southeast of Artesia in Eddy County, New Mexico. The Site is located within Unit G, Section 28, Township 18 South, Range 28 East and the coordinates of the release are latitude 32.71917, longitude -104.18119. The Site location is depicted on a topographic map in **Figure 1**. The Site is an active, operating crude oil terminal.

The following activities were conducted in 2025 including:

- SVE system installation, start-up, and shakedown procedures,
- Operation and maintenance activities, and
- SVE performance monitoring.

Based on the O&M data and performance monitoring data collected, this Report includes recommendations for continued operation of the SVE system at the Site.

### 1.1 Site Background

The Site is leased by HEP and owned by the State of New Mexico. Land use in the Site vicinity is primarily oil and gas production activity and cattle grazing.

After the removal of crude oil Tank 970, stained soil was observed at the ground surface inside the former tank footprint in December 2019. No free liquids were observed but there was no liner beneath former Tank 970.

Initial assessment and delineation activities were conducted on January 22, 2020, to determine the nature and extent of affected soil. Investigation activities were conducted in accordance with 19.15.29 New Mexico Administrative Code (NMAC). Results indicated that a release had occurred and field screening performed during the investigation included observations of hydrocarbon odor and staining, photo-ionization detector (PID) measurements, and chloride measurements. HEP notified NMOCD of the release by telephone and electronic mail on



January 2, 2020, and submitted a NMOCD C-141 Form - Release Notification Report on January 29, 2020.

Additional investigation was conducted in November and December 2020 and was documented in the January 2021 *Site Characterization Report* (TRC 2021a). Borings were completed to laterally and vertically delineate hydrocarbon-affected soil above the water table: SB-1, SB-2, SB-3, SB-4, HA-North, HA-East, HA-South, and HA-West.

An additional site characterization investigation, as documented in the *Site Characterization Report and Remediation Workplan* (TRC 2021b), was conducted which involved completing soil borings from June 1 to June 3, 2021, using air rotary drilling to laterally delineate hydrocarbon-affected soil. Results of the soil analysis identified that total benzene, toluene, ethylbenzene, and xylenes (BTEX) and total petroleum hydrocarbons (TPH) concentrations at the Site have been laterally and vertically delineated to the Closure Criteria.

Following the June 2021 event and prior to initiating the May 2023 excavation activities, a ground penetrating radar (GPR) survey was performed at the Site to determine the presence of buried utilities and pipelines, based on the results utilities/lines were exposed, confirmed to be out of service, and were removed during excavation activities.

Excavation and backfilling activities were conducted from May 8 to June 22 of 2023, and the extent was consistent with the proposed work in the July 2022 *Revised Site Characterization Report and Remedial Work Plan (Revised SCR and RWP [TRC 2022])*. As part of the excavation work confirmation soil sampling was conducted and determined affected soil remains along the northern, eastern, and southern sidewalls and the floor of the excavation. Sidewalls could not be expanded due to the presence of infrastructure. A 20-mil high-density polyethylene (HDPE) liner was installed at 4.5 feet bgs (the depth of the excavation) to function as a surface seal, to prevent leaching of contaminants of concern (COCs), and to promote the lateral vacuum/flow propagation in vadose zone soils during proposed SVE.

Following soil excavation, off-site disposal, liner installation, and backfilling, a SVE pilot test was performed from August 9 to 15, 2023, at the Site to determine the effective radius of influence (ROI) and the optimum operational parameters to maximize treatment of COCs. Four SVE wells (VW-01 to VW-04) were installed using an air-rotary auger drill rig at the locations proposed in the July 2022 *Revised SCR & RWP* and within the temporary polyvinyl chloride (PVC) casings. AcuVac Remediation (AcuVac) performed the seven-day SVE pilot test using a mobile SVE system. A total of five individual tests were performed, including one 72-hour continuous extraction test followed by four 12-hour tests conducted on a pulsed or cycled basis. The SVE pilot test was conducted in general accordance with the July 2022 *Revised SCR and RWP*, except that due to an oversight, effluent vapor concentrations were not recorded during the test. The overall results demonstrated that the existing SVE well network is likely sufficient to treat the entire affected zone with respect to TPH gasoline range organics (GRO) and BTEX in soil to a depth of 32 feet below ground surface (bgs).



HEP submitted the Recommendation Report to the NMOCD on November 14, 2023. NMOCD rejected the submission on June 11, 2024, with comments and HEP and TRC submitted a response to comments on September 12, 2024. In the response HEP committed to conduct additional soil delineation of the release area utilizing a shallow boring to the north and a deep boring to the west. Additional soil delineation completed in April 2025 was reported to the NMOCD on July 1, 2025, in the *Additional Soil Delineation Summary Report* (TRC 2025a) which was approved by NMOCD on September 5, 2025. The *Revised Additional Soil Delineation Summary Report* (TRC 2025b) was submitted to the New Mexico State Land Office (NMSLO) Environmental Compliance Office (ECO) on October 2, 2025, and approved December 10, 2025. Final approval of the November 2023 Recommendation Report by NMOCD was received on October 2, 2024.

Copies of 2024 and 2025 e-mail correspondence between HEP, TRC, and NMOCD are presented in **Appendix A**. Project correspondence prior to 2024 was included in the Recommendation Report.

## 1.2 Remedial Approach and Design Inputs

Soil with total BTEX and/or TPH concentrations above the NMOCD Closure Criteria are being addressed by a hybrid approach due to the presence of critical infrastructure that precludes implementation of remedial activities by mechanical means at certain portions of the Site. Soil remediation was conducted in the accessible portions of the Site including excavation of the upper 4 feet of soil, placement of a liner, and backfilling to original grade. Soil remaining in place with TPH GRO and total BTEX above Closure Criteria beneath the excavated and lined area to an approximate depth of 32 feet bgs are being addressed via SVE. While not intended to directly reduce TPH DRO and motor-oil range organics (MRO) in the soil (as they less readily volatilize and are less mobile), the continual extraction of air will increase the oxygen content of the subsurface which will stimulate bioremediation that can reduce TPH DRO and MRO concentrations over time.

The extent of soil with total BTEX and TPH concentrations above the Closure Criteria are shown in **Figure 2**.

The SVE process involves the continuous flow of air through vadose zone soil, removing COCs from the soil and resulting in increased oxygen to promote in-situ biodegradation of lower-volatility organic compounds present in Site soil. SVE was selected to address TPH GRO and BTEX at the Site because these constituents have high vapor pressures and can be readily volatilized and effectively treated using SVE. In addition, the installed liner promotes the lateral vacuum/flow propagation in vadose zone soils, increasing the effective ROI of SVE at the Site. A SVE pilot test was conducted, as further detailed in the November 2023 Recommendation Report, to determine the effective ROI to address TPH GRO and total BTEX concentrations above Closure Criteria in soil in the upper 32 feet bgs. The SVE pilot test concluded that SVE is feasible to address the BTEX and TPH GRO concentrations in soil at the Site.



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### 1.3 Cultural Properties Protection Rule Compliance

As indicated by Ms. Tami Knight of NMSLO ECO in her January 9, 2025, email, the Cultural Properties Protection (CPP) Rule is not applicable to the Site, as the Site is considered previously disturbed. As shown in **Figure 2**, the SVE system operates within the Site boundaries.

Reclamation activities are expected to remain in previously disturbed areas of the Site. If any future surface disturbing activities encroach into undisturbed areas, the CPP Rule will be followed.

### 1.4 Biologically Sensitive Areas Statement

The Site is considered previously disturbed and no biologically sensitive areas exist; therefore, no impacts to biologically sensitive resources will occur. If any future surface disturbing activities encroach into undisturbed areas, a biological survey will be completed.



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## 2.0 SVE SYSTEM INSTALLATION AND START-UP

### 2.1 Installation

The full-scale SVE system was installed at the Site between March 24, 2025, and March 27, 2025, in accordance with the November 2023 Recommendation Report. The main mechanical components of the full-scale SVE system include:

- An extraction blower,
- Oxidizer for treatment of vapors,
- Knockout tank and collection tote (within secondary containment) to collect condensate liquids (if produced),
- SVE wells VW-01 through VW-04 and associated vacuum-rated hoses and manifold, and
- Ancillary pumps, controls, safety equipment, and piping that connect and control the primary components.

The SVE system and knockout tank are housed in an 8-foot by 20-foot conex storage container. The thermal oxidizer and two 1,000-gallon propane tanks were mounted on concrete pads located adjacent to the cargo container and leveled. The propane tanks were placed at least 50 feet from the thermal oxidizer to meet safety standards. **Figure 2** presents the SVE system layout and photos of the SVE system are included in **Appendix B**.

The full-scale SVE system has significantly more capacity than the mobile system used by AcuVac during the SVE pilot test. The full-scale system can achieve a maximum flow and treatment rate of up to 1,000 cubic feet per minute (cfm), compared with 100 cfm for the mobile SVE system. The increased flow rate facilitates extraction from multiple SVE wells at once.

From April 2 to 4, 2025, a new power pole and meter dedicated to the SVE system was installed adjacent to State Road CR 299 and electrical conduit was trenched from the pole to the SVE system and thermal oxidizer. The local power utility company, Central Valley Electric, could not provide an estimated date for delivery of power to the new pole, therefore, HEP temporarily provided power to the SVE system from the facility's existing power supply to avoid a significant delay to the project schedule. At the time of the Report, power has not been provided by the local utility.

Air emissions associated with the SVE system and oxidizer were added to the existing New Mexico Environment Department (NMED) Air Quality Bureau Notice of Intent form (NOI) for the facility. The NOI was submitted to the NMED via the ePermitting Portal for an Oil & Gas facility in New Mexico on May 31, 2024. In a letter dated June 28, 2024, the NMED determined an air quality permit is not required and stated that construction of the SVE system could commence.



The SVE system is located within the operating facility's fenceline and the SVE system and thermal oxidizer control panels are secured with locks. Safety signage, fire extinguishers, hearing and eye protection, and an eye washing station are provided.

## 2.2 SVE System Start-Up and Catalyst Replacement

The SVE system installed at the Site was previously operated at a HEP facility in Boise, Idaho. The SVE system had been idle for several years. During the week of April 2, 2025, the SVE system was started and commissioned with the assistance of HEP's electrical subcontractor. During the commissioning process, the following were checked: motor rotation and load testing, sensor input-output configuration and testing, interlock and safety protocol testing, flow and system balancing, and leak checks. Influent soil vapor was analyzed for concentrations of oxygen, carbon dioxide, and methane using a RKI GX-6000 6-gas meter, to assess the potential for flammability of the influent vapor stream, in addition to elevated VOC concentrations.

From April 7 to 10, 2025, each component of the SVE system was cleaned, oil and filters were changed as appropriate, mechanical and computer system components were inspected and tested, the knockout tank valve was replaced, and a new telemetry system was installed. The thermal oxidizer was designed to operate in either thermal or catalyst modes. A specific orifice plate was ordered and installed to facilitate operating in catalyst mode.

The SVE system was started April 22, 2025, and extracted continuously at all four SVE wells (VW-01 through VW-04) to maximize the removal of hydrocarbons to the greatest extent practicable. The SVE system operated intermittently through May 14, 2025, while troubleshooting was conducted and dilution settings were adjusted. Operating data (**Section 3.0**) indicated that the SVE system was running less efficiently with time. The system was shut down on May 14, 2025, for assessment. On May 27, 2025, it was concluded that the thermal oxidizer catalyst had failed; a replacement catalyst was ordered. HEP notified NMOCD of the status of the thermal oxidizer on June 13, 2025. The new catalyst was installed August 14, 2025, but the SVE system was still inoperative. HEP subcontracted Mission Flares and Combustion, LLC (Mission Flares) to assess and repair the SVE system. After replacing a faulty high pressure switch, reconfiguring the thermal oxidizer settings, and making dilution changes, the SVE system resumed operation October 21, 2025. The system operated until December 9, 2025 (50 days) before requiring additional assessment. Repairs were completed and the system was restarted January 8, 2026.



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### 3.0 SVE SYSTEM O&M

#### 3.1 Routine O&M Events

The O&M schedule proposed in the November 2023 Recommendation Report included daily O&M for the first week, weekly for the following three weeks, and bi-weekly to monthly thereafter. Due to the intermittent operation of the SVE system in 2025, O&M events were conducted at the following frequency:

- Daily O&M events were conducted the first two weeks after the SVE system was started on April 22 to 25, 2025, and April 28 and 29, 2025.
- Two of three planned weekly O&M events were conducted May 5, 2025, and May 12, 2025, prior to the catalyst failure. The third weekly O&M event was conducted August 15, 2025, during catalyst replacement activities.
- Bi-weekly O&M events were initiated when operation of the SVE system resumed on October 21, 2025. A total of three bi-weekly O&M events were conducted in 2025 on October 23, November 12, and November 24, 2025. The SVE system shut down on December 9, 2025, and repairs were scheduled for 2026.

The SVE O&M forms are provided in **Appendix C**.

#### 3.2 O&M Field Data Collected

**Appendix C** includes the field data collected during each O&M event. Influent and effluent air quality data was either recorded or measured using a RKI GX-6000 6-gas meter. TRC collected the following field data in accordance with the Recommendation Report:

- Influent gas levels,
- Effluent VOCs,
- Influent temperature,
- Influent applied vacuum,
- System run time,
- Propane usage; and
- Volume of condensate produced.

Of the parameters noted in November 2023 Recommendation Report, the following were not collected in 2025, but will be determined as part of the recommendations for 2026 (**Section 5.2**):

- Influent vapor flow rate - due to the issues noted in **Section 2.2**, vapor flow rate readings have not been collected. The flow rate has been estimated based on other



system readings. TRC will install the equipment necessary to directly collect these readings in 2026.

- Observation well vacuums (when not being used for extraction) - SVE has been conducted at all SVE wells concurrently. As a result, none of the SVE wells have been used as observation wells and therefore no effective ROI Determination has been made in 2025, but the ROI will be assessed in 2026 and an effective ROI determination will be made.

TRC did not measure SVE well gas levels (oxygen, methane, carbon dioxide, and VOCs) because the vacuum applied by the system prevents the RKI GX-6000 6-gas meter from obtaining readings at the well heads. In the future, TRC will collect quarterly samples from the wellheads to obtain this information.

### 3.3 O&M Field Data and Evaluation

A summary of the field data collected during routine O&M events that is used to evaluate system effectiveness is provided in **Sections 3.3.1, 3.3.2, and 3.3.3** below. The O&M data used to evaluate system effectiveness includes system run time, system and individual wellhead vacuum measurements, influent and effluent VOC concentrations from the thermal oxidizer, and the calculation of VOC reduction efficiency.

#### 3.3.1 SVE System 2025 Run Time and Vacuum Results

Vacuum readings were collected a total of sixteen times throughout the O&M monitoring activities beginning on April 22, 2025. A summary of the SVE system run time, overall vacuum and individual well extraction vacuums are summarized in the following table.

Date	Run Time (hours)	SVE Vacuum at Enclosure (in WC)	VW-01 Vacuum (in WC)	VW-02 Vacuum (in WC)	VW-03 Vacuum (in WC)	VW-04 Vacuum (in WC)
Weeks 1 and 2: Daily Readings						
4/22/2025	0	32	20	20	20	20
4/23/2025	29	86.3	10	10	10	10
4/24/2025	37	NR	2	2	2	2
4/25/2025	39	86.3	10	10	10	10
4/28/2025	44	84.2	10	10	10	10
4/29/2025	50	90.3	18	18	18	18
Week 3: Weekly Event 1						
5/5/2025	122	34.3	20	20	20	20
5/6/2025	140	53.4	38	38	38	38
5/7/2025	157	30.2	19	19	19	19
5/9/2025	195	55.2	40	40	40	40
	197	51.8	39	39	39	39



Date	Run Time (hours)	SVE Vacuum at Enclosure (in WC)	VW-01 Vacuum (in WC)	VW-02 Vacuum (in WC)	VW-03 Vacuum (in WC)	VW-04 Vacuum (in WC)
Week 4: Weekly Event 2						
5/12/2025	203	47.2	35	35	35	35
Week 5: Weekly Event 3 and Repairs (New Catalyst Installed)						
8/14/2025	302	30.2	15	15	15	15
Weeks 6-10: Bi-Weekly Events 1-3						
10/23/2025	351	50	30	30	30	30
11/12/2025	830	50.1	30	30	30	30
11/24/2025	1,133	60	38	33	32	38
12/9/2025*	1,413	NR	NR	NR	NR	NR

**Notes:**

in WC – inches water column

NR – not recorded

\* – run time estimated based on propane usage

The SVE system operated for approximately 1,413 hours from April 22, 2025, to December 31, 2025. There were several significant issues with the system that contributed to the down time. Separating the operation into four general phases allows for a better operations assessment, with the time intervals being the startup period (between April 22, 2025, and May 12, 2025), the repair period (May 12, 2025, to October 23, 2025), the reliable operation period (October 23, 2025, to December 9, 2025), and the ending stoppage period (December 9, 2025, to December 31, 2025).

During the startup period, run time averaged approximately 42%, overall system vacuum ranged between 30 and 90 inches of water column (in WC), and individual well vacuums ranged from 2 to 40 in WC. Operations were relatively steady considering this was an initial operating period.

System operation was minimal (ran less than 4% of the time) in the repair period. The troubleshooting and catalyst replacement delayed operations.

During the reliable operation period, the system operated during the entire phase (94% run time), system vacuum was between 50 and 60 in WC, and individual well vacuums ranged between 30 and 40 in WC. Omitting the repair period, the SVE system had an uptime of approximately 79% from April 22, 2025, to December 9, 2025.

The ending stoppage period began when an issue was discovered on December 9, 2025, that stopped operations and required additional assessment and repairs. HEP subcontracted Mission Flares to assess and repair the SVE system in January of 2026.



### 3.3.2 Calculated Reduction Efficiency of VOCs

The overall reduction efficiency of VOCs through SVE has been calculated using the difference in detected concentrations of VOCs in the influent and effluent at the combined inlet piping. The results of the influent and effluent VOC monitoring and calculated reduction efficiency is detailed in the table below.

Date	Run Time (hours)	Influent VOCs (ppm)	Effluent VOCs (ppm)	Calculated VOC Reduction Efficiency (%)
Weeks 1 and 2: Daily Readings				
4/22/2025	0	914	8.1	99
4/23/2025	29	562.2	3.0	99
4/24/2025	37	618	2.4	100
4/25/2025	39	595.5	4.8	99
4/28/2025	44	635	140.1	78
4/29/2025	50	640	160.8	75
Week 3: Weekly Event 1				
5/5/2025	122	726	535	26
5/6/2025	140	1,253	968	23
5/7/2025	157	560.4	299.5	47
5/9/2025	195	1,335	973	27
	197	1,245	807	35
Week 4: Weekly Event 2				
5/12/2025	203	995	823	17
Week 5: Weekly Event 3 and Repairs (New Catalyst Installed)				
8/14/2025	302	608	0.3	100
Weeks 6-10: Bi-Weekly Events 1-3				
10/23/2025	351	1,097	2.6	100
11/12/2025	830	1,200	4	100
11/24/2025	1,133	1,543	2.5	100
12/9/2025*	1,413	NR	NR	NR

**Notes:**

1. Only intervals in which the system has run time recorded are in the above table
2. Asterisk (\*) denotes run time was estimated based on propane usage

**Abbreviations:**

ppm – parts per million  
 % - percentage  
 NR – Not recorded

The SVE system is estimated to have run approximately 1,413 hours in 2025. The combined influent VOC concentrations ranged from a low of 595.5 parts per million (ppm) in May 2025 to a high of 1,543 ppm in November 2025. Effluent VOCs ranged from a low of 0.3 ppm (August 2025) to 973 ppm (May 2025). The VOC reduction efficiency was calculated by determining the percentage of VOCs measured going into the SVE system destroyed by the thermal oxidizer.



During the first four days of the SVE system operation in April 2025, an average of 99% of the influent VOCs were destroyed by the thermal oxidizer. However, the VOC reduction efficiency reduced to a low of 17% by May 12, 2025, indicating the catalyst material had failed. The system was shut down while repairs were completed, and sustained operations resumed in October 2025, after the catalyst was replaced, and approximately 100% of influent VOCs have been destroyed since. The system's operations stopped again by December 9, 2025, and inspections and repairs were completed January 2026.

### 3.3.3 Mass of Recovered Hydrocarbons

The mass of recovered hydrocarbons could only be estimated because the system does not have flow meters, as the focus of 2025 was on ensuring successful activation and operation. The mass of recovered hydrocarbons during 2025 was determined to be the product of the flow rate, run time, and influent PID readings. The molar mass of recovered hydrocarbons was assumed to match that of isobutylene because the PID uses isobutylene as the calibration gas. The blower's speed was maintained at 1,400 revolutions per minute so the flow rate at the inlet was assumed to be 800 cfm per the manufacturer's blower performance curve, and the molar volume was assumed to be 24.04 liters per mole (approximately 1 atmospheric pressure and 68 degrees Fahrenheit). Based on these assumptions, approximately 9,300 pounds of hydrocarbons (roughly equivalent to 1,200 gallons of crude oil) were recovered in 2025. Future work will include installation of flow meters to increase the accuracy of the estimated mass of recovered hydrocarbons. The below table details the mass of recovered hydrocarbons.

Date	Run Time (hours)	Influent VOCs (ppm)	Mass Recovered (lbs)	Cumulative Mass Recovered (lbs)
Weeks 1 and 2: Daily Readings				
4/22/2025	0	914	0	0
4/23/2025	29	562.2	114	114
4/24/2025	37	618	35	149
4/25/2025	39	595.5	8	157
4/28/2025	44	635	22	179
4/29/2025	50	640	27	206
4/30/2025	50	640	0	206
5/1/2025	50	640	0	206
5/2/2025	104	640	242	448
Week 3: Weekly Event 1				
5/5/2025	122	726	91	539
5/6/2025	140	1,253	158	697
5/7/2025	157	560.4	67	763
5/9/2025	195	1,335	355	1,118



Date	Run Time (hours)	Influent VOCs (ppm)	Mass Recovered (lbs)	Cumulative Mass Recovered (lbs)
	197	1,245	17	1,136
Week 4: Weekly Event 2				
5/12/2025	203	995	42	1,177
Week 5: Weekly Event 3 and Repairs (New Catalyst Installed)				
8/14/2025	302	608	421	1,598
Weeks 6-10: Bi-Weekly Events 1-3				
10/23/2025	351	1,097	376	1,974
10/30/2025	351	1,097	0	1,974
11/12/2025	830	1,200	4020	5,995
11/24/2025	1,133	1,543	3270	9,264
12/9/2025*	1,413	1,543	3,022	12,286

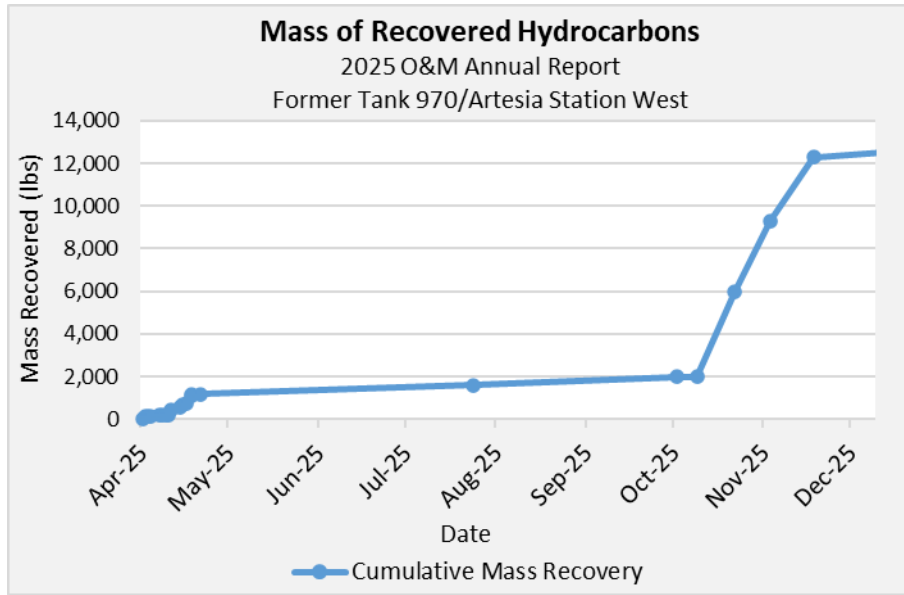
**Notes:**

1. Flow rate assumed to be 800 CFM (at conditions which would make the molar volume 24.04 liters per mole).
2. Molar mass of recovered VOC molecule assumed to be equivalent to isobutylene's.
3. Asterisk (\*) denotes run time was estimated based off of propane usage, and influent and destruction efficiency were assumed to be the same as the above entry.

**Abbreviations:**

hrs - hours  
 VOC - volatile organic carbon compound  
 ppm - parts per million  
 lbs - pounds

The below chart shows the mass of hydrocarbons recovered throughout 2025. Most of the hydrocarbons were recovered during the reliable operation period (October 23, 2025, to December 9, 2025), with the 2<sup>nd</sup> highest rate of hydrocarbon destruction occurring in the startup period (between April 22, 2025, and May 12, 2025).



**3.3.4 Effective ROI Determination**

The effective ROI was not calculated because all four SVE wells were used for extraction during 2025 and therefore the vacuum response couldn't be monitored. Data from the pilot testing has shown that the SVE wells, and specifically well VW-04, have an adequate ROI to cover the treatment area. O&M activities in 2026 will include the determination of this performance measure as described in **Section 5.2**.



## 4.0 SVE SYSTEM SAMPLING AND ANALYSIS RESULTS

### 4.1 TPH and BTEX

Quarterly influent and effluent samples were collected for laboratory analysis in accordance with the November 2023 Recommendation Report to track the cumulative hydrocarbon mass removal over time and to document the destruction efficiency of the oxidizer. Baseline influent and effluent vapor samples were collected April 23, 2025 (2Q2025), during the SVE system start-up activities, and quarterly influent and effluent samples were collected November 24, 2025 (4Q2025). Quarterly sampling was not performed during the third quarter of 2025 because the SVE system was not operating while the replacement catalyst was ordered, manufactured, shipped, and installed. During each quarterly sampling event, influent and effluent vapor samples were collected using Tedlar bags and submitted to Eurofins Air Toxics Laboratory in Folsom, California for the analysis of TPH by Toxic Organic (TO) Method TO-3 and BTEX by Method TO-15. The vapor laboratory analytical reports are presented in **Appendix D** and summarized in the table below.

Sample ID	Date	Benzene (ppbv)	Toluene (ppbv)	Ethyl-benzene (ppbv)	o-Xylene (ppbv)	m, p-Xylene (ppbv)	TPH GRO (ppmV)
Influent	4/26/2025	44,000	4,500	9,600	1,800	10,000	2,800
Effluent	4/26/2025	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	0.49
VOC Reduction Efficiency (%)		100	100	100	100	100	99.9
Influent	11/24/2025	37,000	30,000	20,000	4,800	22,000	3,200
Effluent	11/24/2025	91	44	21	< 12.0	27	6.7
VOC Reduction Efficiency (%)		99.8	99.9	99.9	100	99.9	99.8

**Notes:**

ppbv – parts per billion by volume

ppmv – parts per million by volume

< – not detected above the method detection limit with value noting the method's detection limit

VOC – volatile organic compound

% - percent

The effluent results indicate that the SVE system decreased the influent VOC concentrations by 99.8 to 100%. Influent concentrations increased from April to November 2025, with total BTEX and TPH GRO concentrations respectively increasing 63% and 14% between April 2025 and November 2025. The November 2025 influent results were roughly six times higher for toluene, and roughly twice as high for ethyl-benzene, m, p-xylene and o-xylene than the baseline samples. Other compounds (benzene and TPH GRO) remained close to their baseline sampling results. The vapor treatment efficiency was not significantly reduced due to the increase in influent concentrations, demonstrating that the oxidizer is an appropriate vapor treatment technology, and that it is operating properly after the repair period.



---

## 4.2 Potential Catalyst Poisoning Sampling

As discussed in **Section 2.2**, it was observed that the destruction efficiency of the oxidizer was rapidly declining. On May 27, 2025, TRC and HEP identified that the SVE systems thermal oxidizer catalyst was damaged and a new catalyst was ordered. TRC investigated if the extracted vapors were poisoning the catalyst by screening for sulfur-containing compounds. On July 8, 2025, samples of the influent vapors were collected in Summa canisters and submitted to Atmospheric Analysis and Consulting, Inc., located in Ventura, California for analysis of common catalyst poisons by methods ASTM D5504, TO-15, and TO-15M. The results are summarized in **Table 1** and the laboratory analytical report is provided in **Appendix D**.

The results showed that the sulfur-based compounds are not present at concentrations that would poison the catalyst. Since the catalyst material in the SVE system that failed was used at another site, further testing of these samples would not be able to distinguish which site was predominantly responsible for the failure.

The oxidizer has generally been operating continuously since the catalyst replacement and has demonstrated a VOC and TPH destruction efficiency of approximately 99.8% based on the November 2025 air sample results.



## 5.0 CONCLUSIONS AND RECOMMENDATIONS

### 5.1 Implementation Schedule

The SVE system will continue to be operated during 2026. O&M of the SVE system will be conducted bi-weekly in the first four months of 2026 (8 events) and monthly in the remaining eight months of 2026 (8 events). The *2026 O&M Annual Report* will be prepared and submitted to NMOCD within 90 days of the end of the calendar year during which the system O&M occurs.

### 5.2 Evaluation of System Effectiveness and Recommendations

As mentioned in **Section 1.2** the objective of the full-scale SVE system is to reduce soil concentrations in the upper 32 feet of soil of TPH GRO to less than 1,000 mg/kg in the soil, and total BTEX to less than 50 mg/kg. The November 2023 *Recommendation Report* identifies the primary performance measures for the full scale system as extraction flow rate, influent vapor concentrations, effective ROI, and hydrocarbon recovery rates and cumulative hydrocarbon recovery.

The collected influent and effluent vapor concentration data shows the system is achieving its objectives as evidenced by its average VOC destruction of over 99% (**Section 3.3.2**). The total hydrocarbon recovery in 2025 is approximately 9,300 pounds (**Section 3.3.3**). However, the system's operation in 2025 was limited by the issues noted in **Section 2.2**, and these issues have been resolved. The influent and effluent concentration data were measured by using a 6-gas meter and the quarterly sampling events, and the similar results from the different methods confirm the accuracy of the calculated VOC destruction efficiency. As a result, TRC recommends that the focus for 2026 should be placed on maintaining successful system operation, as well as adjusting instrumentation to gather additional flow rate data.

In addition to the primary performance measures identified in the November 2023 Recommendation Report, the vacuum data (**Section 3.3.1**) and COC concentration data (**Section 4.1**) show favorable results. The vacuums observed at each well remain similar to the vacuums observed during the pilot test. The observed increase of COC concentrations is an indication the SVE System is drawing from surrounding areas and impacted soil gas remains in place for remediation. Concentrations of COCs are expected to decrease with additional SVE system run time.

To achieve successful system operation and conformance with the project objectives TRC recommends the following actions be performed in 2026:

- Repairing the issue encountered on December 9, 2025, which caused the system to shut down - TRC and Mission Flares assessed the system, made the necessary repairs, and restarted the system in January of 2026.



- 
- Installing equipment required to measure total flow from wells and dilution air (as noted in **Section 3.2**) - the next time system experiences a prolonged stoppage, TRC will use the opportunity to install pitot tube style flow meters required to measure influent vapor flow rate. One flow meter will be installed at the intake to measure the total air coming into the blower, another flow meter will be installed on the intake upstream of the dilution air valve to measure air coming from the well field, and the remaining flow meters will be installed on each gas well to measure individual well outputs. The two flow meters on the intake are required to better calculate the mass of destroyed and recovered hydrocarbons.
  - Conduct a ROI study – after installing the flow meters but before fully restarting the system, TRC will conduct an ROI study so an effective ROI determination can be made. The ROI study will be conducted in a similar manner to how it was conducted in the pilot testing, however the ROI will be estimated at multiple applied vacuums to establish a relationship between applied vacuum and vacuums in the ROI. In addition, modifications will be performed to shorten the length of the test time so the ROI study can be conducted in a single day:
    - The ROI will be determined only using the three wells (VW-01, VW-03, and VW-04), which have observation points in multiple cardinal directions.
    - Each well will be tested at three steps using a below average vacuum that is commonly observed, the average observed vacuum, and an above average vacuum that is commonly observed; and the length of time at each step will be limited to 1-2 hours.



---

## 6.0 REFERENCES

TRC 2021a. Site Characterization Report, Former Tank 970/Artesia Station West, Incident No. NCE2003752717, January 25, 2021.

TRC 2021b. Site Characterization Report and Remediation Work Plan, Former Tank 970/Artesia Station West, Incident No. NCE2003752717, August 16, 2021.

TRC 2022. Revised Site Characterization Report and Remedial Work Plan, Former Tank 970/Artesia Station West, Incident No. NCE2003752717, July 21, 2022.

TRC 2023. Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report, Former Tank 970/Artesia Station West, Incident No. NCE2003752717, November 14, 2023.

TRC 2025a. Additional Soil Delineation Summary Report, Former Tank 970/Artesia Station West, Incident No. NCE2003752717, July 1, 2025.

TRC 2025b. Revised Additional Soil Delineation Summary Report, Former Tank 970/Artesia Station West, Incident No. NCE2003752717, October 2, 2025.

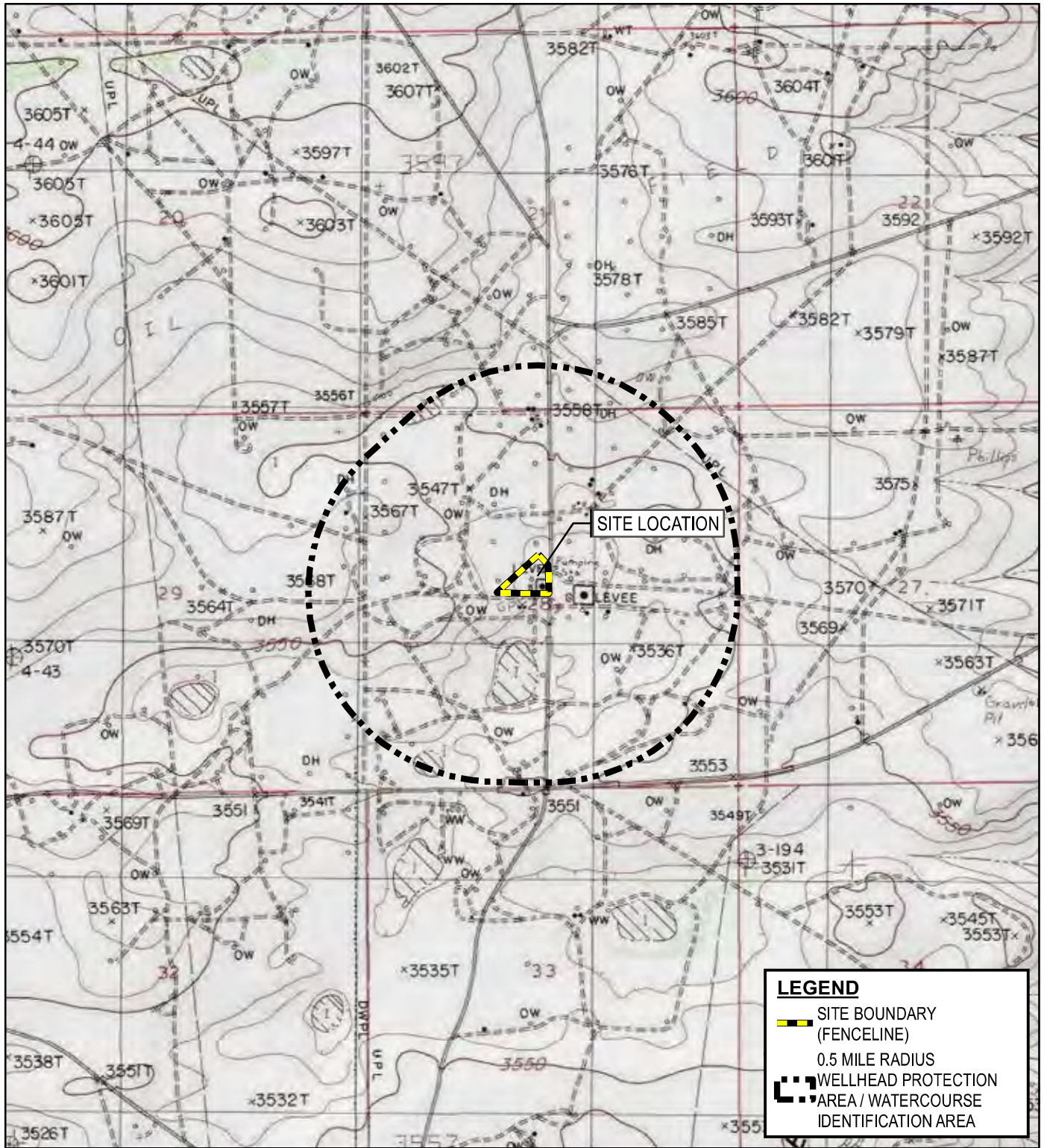
**Table**

Table 1  
Summary of Soil Vapor Sample Analytical Results  
Potential Catalyst Poisons  
Former Tank 970 / Artesia Station West

Constituent of Concern	T970 SVE Influent
	7/8/2025 Result
<b>VOCs by TO-15 (ppb)</b>	
Chlorodifluoromethane	<38.5
Propene	692
Dichlorodifluoromethane	<38.5
Chloromethane	<38.5
Dichlorotetrafluoroethane	<38.5
Vinyl Chloride	<38.5
Methanol	<38.5
1,3-Butadiene	<38.5
Bromomethane	<38.5
Chloroethane	<38.5
Dichlorofluoromethane	<38.5
Ethanol	<154
Vinyl Bromide	<38.5
Acetone	<154
Trichlorofluoromethane	<38.5
2-Propanol (IPA)	<154
Acrylonitrile	<77.0
1, 1-Dichloroethane	<38.5
Methylene Chloride (DCM)	<77.0
Allyl Chloride	<77.0
Carbon Disulfide	404
Trichlorotrifluoroethane	<38.5
trans-1, 2-Dichloroethene	<38.5
1,1-Dichloroethane	<38.5
Methyl Tert Butyl Ether (MTBE)	<38.5
Vinyl Acetate	<38.5
2-Butanone (MEK)	<77.0
cis-1,2-Dichloroethene	<38.5
Hexane	145,000
Chloroform	<38.5
Ethyl Acetate	<38.5
Tetrahydrofuran	<38.5
1,2-Dichloroethane	<38.5
1,1,1-Trichloroethane	<38.5
Benzene	45,500
Carbon Tetrachloride	<38.5
Cyclohexane	214,000
1,2-Dichloropropane	<38.5
Bromodichloromethane	<38.5
1,4-Dioxane	<77.0
Trichloroethane (TCE)	<38.5
2,2,4-Trimethylpentane	<38.5
Heptane	88,800
cis-1,3-Dichloropropene	<38.5
4-Methyl-2-pentanone (MIBK)	<38.5
trans-1,3-Dichloropropene	<38.5
1,1,2-Trichloroethane	<38.5
Toluene	23,700
2-Hexanone (MBK)	<77.0
Dibromochloromethane	<38.5
1,2-Dibromoethane	<38.5
Tetrachloroethane (PCE)	<38.5
Chlorobenzene	<38.5
Ethylbenzene	10,500
m & p-Xylene	13,000
Bromoform	<38.5
Styrene	<38.5
1,1,2,2-Tetrachloroethane	<38.5
o-Xylene	2,630
4-Ethyltoluene	1,730
1,3,5-trimethylbenzene	558
1,2,4-Trmethylbenzene	1,270
Benzyl chloride (a-Chlorotoluene)	<38.5
1,3-Dichlorobenzene	<38.5
1,4-Dichlorobenzene	<38.5
1,2-Dichlorobenzene	<38.5
1,2,4-Trichlorobenzene	<38.5
Hexachlorobutadiene	<38.5
<b>Siloxanes by TO-15 (ug/m<sup>3</sup>)</b>	
Trimethylsilanol *	<284
Tetramethylsilane	<278
Hexamethyldisiloxane (L2)	<511
Hexamethylcyclotrisiloxane (D3)	<700
Octamethyltetrasiloxane (L3)	<745
Octamethylcyclotetrasiloxane (D4)	<934
Decamethyltetrasiloxane (L4)	<978
Decamethylcyclopentasiloxane (D5)	<1,170
Dodecamethylpentasiloxane (L5) *	<1,210
<b>Total Reduced Sulfur Compounds by ASTM D-5504 (ppmv)</b>	
<b>Canister Dilution Factor 1.5</b>	
Hydrogen sulfide	<0.077
COS/SO2	0.291
Methyl Mercaptan	<0.077
Ethyl Mercaptan	<0.077
Dimethyl Sulfide	<0.077
Carbon Disulfide	0.591
isopropyl Mercaptan	<0.077
tert-Butyl Mercaptan	<0.077
n-Propyl Mercaptan	<0.077
Methylethylsulfide	<0.077
sec-Butyl Mercaptan / Thiophene	<0.077
iso-Butyl Mercaptan	<0.077
Diethyl Sulfide	0.080
n-Butyl Mercaptan	<0.077
Dimethyl Disulfide	<0.077
2-Methylthiophene	<0.077
3-Methylthiophene	<0.077
Tetrahydrothiophene	<0.077
Bromothiophene	<0.077
Diethyl Disulfide	<0.077
Total Unidentified Sulfur	<0.077
<b>Total Reduced Sulfurs</b>	<b>0.671</b>

Notes:  
VOCs = volatile organic compounds  
ppb = parts per billion  
ug/m<sup>3</sup> = micrograms per cubic meter  
ppmv = parts per million volumetric  
\* Results and SRL are estimated

## **Figures**



BASE MAP FROM USGS 7.5 MINUTE TOPOGRAPHIC QUADRANGLE SERIES.



S:\1-PROJECTS\HOLLY ENERGY PARTNERS\Artesia\460025\_Tank970\_2022\mxd\Artesia\_West\_1.mxd - Saved By: MJAGOS on 3/25/2022, 13:06:23 PM

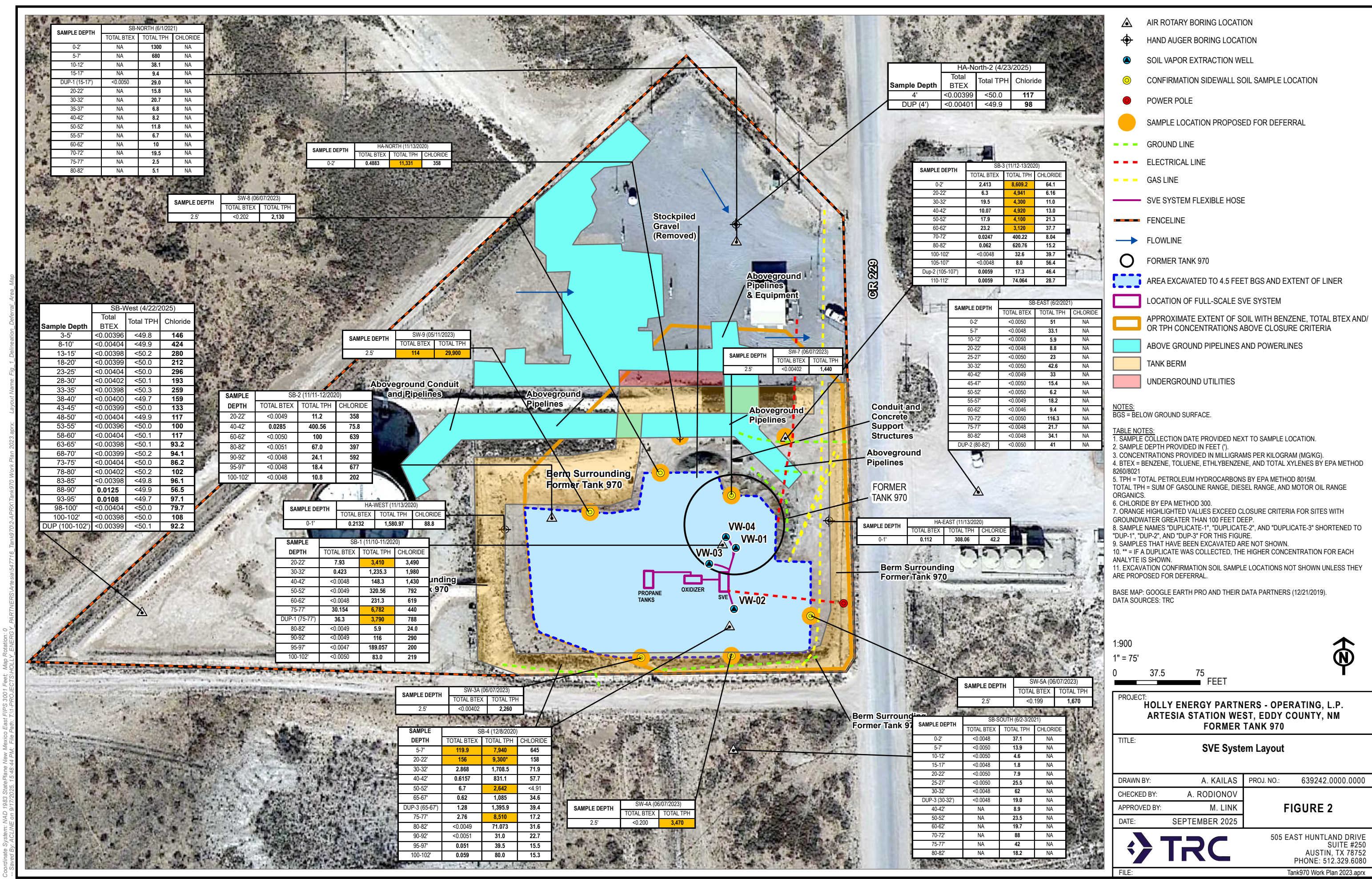
**TRC**  
505 East Huntland Drive  
Suite #250  
Austin, TX 78752  
Phone: 512.329.6080

PROJECT: **HOLLY ENERGY PARTNERS - OPERATING, L.P.  
ARTESIA STATION WEST, EDDY COUNTY, NM  
FORMER TANK 970**

TITLE: **SITE LOCATION MAP**

DRAWN BY:	S. RAY
CHECKED BY:	RDV
APPROVED BY:	RDV
DATE:	MARCH 2022
PROJ. NO.:	390691
FILE:	Artesia_West_1.mxd

**FIGURE 1**

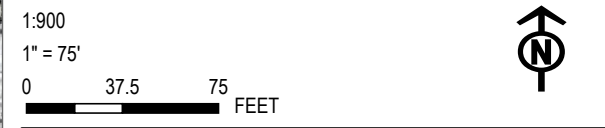


- ▲ AIR ROTARY BORING LOCATION
- ⊕ HAND AUGER BORING LOCATION
- SOIL VAPOR EXTRACTION WELL
- ⊙ CONFIRMATION SIDEWALL SOIL SAMPLE LOCATION
- POWER POLE
- SAMPLE LOCATION PROPOSED FOR DEFERRAL
- GROUND LINE
- ELECTRICAL LINE
- GAS LINE
- SVE SYSTEM FLEXIBLE HOSE
- FENCELINE
- FLOWLINE
- FORMER TANK 970
- AREA EXCAVATED TO 4.5 FEET BGS AND EXTENT OF LINER
- LOCATION OF FULL-SCALE SVE SYSTEM
- APPROXIMATE EXTENT OF SOIL WITH BENZENE, TOTAL BTEX AND/OR TPH CONCENTRATIONS ABOVE CLOSURE CRITERIA
- ABOVE GROUND PIPELINES AND POWERLINES
- TANK BERM
- UNDERGROUND UTILITIES

**NOTES:**  
BGS = BELOW GROUND SURFACE.

**TABLE NOTES:**  
1. SAMPLE COLLECTION DATE PROVIDED NEXT TO SAMPLE LOCATION.  
2. SAMPLE DEPTH PROVIDED IN FEET (').  
3. CONCENTRATIONS PROVIDED IN MILLIGRAMS PER KILOGRAM (MG/KG).  
4. BTEX = BENZENE, TOLUENE, ETHYLBENZENE, AND TOTAL XYLENES BY EPA METHOD 8260/8021  
5. TPH = TOTAL PETROLEUM HYDROCARBONS BY EPA METHOD 8015M. TOTAL TPH = SUM OF GASOLINE RANGE, DIESEL RANGE, AND MOTOR OIL RANGE ORGANICS.  
6. CHLORIDE BY EPA METHOD 300.  
7. ORANGE HIGHLIGHTED VALUES EXCEED CLOSURE CRITERIA FOR SITES WITH GROUNDWATER GREATER THAN 100 FEET DEEP.  
8. SAMPLE NAMES "DUPLICATE-1", "DUPLICATE-2", AND "DUPLICATE-3" SHORTENED TO "DUP-1", "DUP-2", AND "DUP-3" FOR THIS FIGURE.  
9. SAMPLES THAT HAVE BEEN EXCAVATED ARE NOT SHOWN.  
10. \*\* = IF A DUPLICATE WAS COLLECTED, THE HIGHER CONCENTRATION FOR EACH ANALYTE IS SHOWN.  
11. EXCAVATION CONFIRMATION SOIL SAMPLE LOCATIONS NOT SHOWN UNLESS THEY ARE PROPOSED FOR DEFERRAL.

BASE MAP: GOOGLE EARTH PRO AND THEIR DATA PARTNERS (12/21/2019).  
DATA SOURCES: TRC



PROJECT: **HOLLY ENERGY PARTNERS - OPERATING, L.P. ARTESIA STATION WEST, EDDY COUNTY, NM FORMER TANK 970**

TITLE: **SVE System Layout**

DRAWN BY: A. KAILAS PROJ. NO.: 639242.0000.0000

CHECKED BY: A. RODIONOV

APPROVED BY: M. LINK

DATE: SEPTEMBER 2025

**FIGURE 2**

TRC 505 EAST HUNTLAND DRIVE SUITE #250 AUSTIN, TX 78752 PHONE: 512.329.6080

FILE: Tank970 Work Plan 2023.aprx

## **Appendix A: Copies of 2024 and 2025 E-mail Correspondence**



[EXTERNAL] NCE2003752717 ARTESIA WEST STATION

From Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>  
Date Fri 4/12/2024 9:29 AM  
To Link, Marianne <MLink@trccompanies.com>  
Cc Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Marianne,

It looks like Michael Buchanan is the reviewer on this particular incident. I'll let you discuss it with him. His email address is [Michael.Buchanan@emnrd.nm.gov](mailto:Michael.Buchanan@emnrd.nm.gov)

Regards,

**Robert Hamlet** • Environmental Specialist - Advanced  
Environmental Bureau  
EMNRD - Oil Conservation Division  
506 W. Texas Ave. | Artesia, NM 88210  
575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)  
<http://www.emnrd.state.nm.us/OCD/>



**From:** Link, Marianne <MLink@trccompanies.com>  
**Sent:** Friday, April 12, 2024 7:09 AM  
**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>  
**Subject:** RE: [EXTERNAL] Introduction

I am so sorry; I should have included that! The NMOCD Incident No. NCE2003752717.

Thank you,  
**Marianne Link, PG**  
Senior Project Manager



505 E. Huntland Dr., Suite 250, Austin, TX 78752  
T 512.329.6080 | C 919.943.2631 | [mlink@trccompanies.com](mailto:mlink@trccompanies.com)  
[LinkedIn](#) | [Twitter](#) [TRCcompanies.com](https://www.trccompanies.com)

**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>  
**Sent:** Friday, April 12, 2024 9:06 AM  
**To:** Link, Marianne <[MLink@trccompanies.com](mailto:MLink@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] Introduction

This is an External email. Do not click links or open attachments unless you validate the sender and know the content is safe.

ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

Marianne,

Do you have an App ID number or the Incident Number?

**Robert Hamlet** • Environmental Specialist - Advanced

Environmental Bureau

EMNRD - Oil Conservation Division

506 W. Texas Ave. | Artesia, NM 88210

575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



**From:** Link, Marianne <[MLink@trccompanies.com](mailto:MLink@trccompanies.com)>

**Sent:** Thursday, April 11, 2024 4:13 PM

**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>

**Subject:** [EXTERNAL] Introduction

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi Robert,

I got your contact information from Jared Stoffel so I can introduce myself. I started with TRC a few months ago. I am a part of the Austin Office, although I am working fully remotely from North Carolina. I will be working on the Former Tank 970/Artesia Station West project. I called today but your voicemail box is full. If you are the correct person to ask, would it be possible for you to let me know what the status of the review of the Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report? If you are not the correct person, could you forward my email or let me know who the correct person is?

Thanks so much for your time,

**Marianne Link, PG**

Senior Project Manager



505 E. Huntland Dr., Suite 250, Austin, TX 78752

T 512.329.6080 | C 919.943.2631 | [mlink@trccompanies.com](mailto:mink@trccompanies.com)

[LinkedIn](#) | [Twitter](#) | [TRCcompanies.com](http://TRCcompanies.com)



[EXTERNAL] The Oil Conservation Division (OCD) has rejected the application, Application ID: 285414

From Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Date Tue 6/11/2024 6:01 PM

To Leik, Jason <Jason.Leik@HFSinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; Stoffel, Jared <JStoffel@trccompanies.com>; Sahba, Arsin M. <Arsin.Sahba@HFSinclair.com>; Link, Marianne <MLink@trccompanies.com>

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Please see below concerning the Artesia Tank 970 OCD has basically thrown a whammy at us. Jared is reviewing and will send a follow-up email detailing what this means and possible measures to address.

*I can now be reached at: [Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com). Please update your records.*

Thank you,

**Melanie Nolan**

Environmental Specialist | Environmental

**O** 575-748-8972

**M** 214-605-8303

[Melanie.Nolan@hfsinclair.com](mailto:Melanie.Nolan@hfsinclair.com)

[www.HFSinclair.com](http://www.HFSinclair.com)

1602 W. Main, Artesia, New Mexico 88210



MIDSTREAM

From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>

Sent: Tuesday, June 11, 2024 1:54 PM

To: Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 285414

**CAUTION:** This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, for the following reasons:

- **The Remediation Plan/Deferral Request is Denied. The proposed deferral area will need to be vertically/horizontally delineated before a deferral request can be considered. Safety should be paramount sampling around equipment and pipelines, use your best judgement. If you believe a certain area will require a deferral, please make sure that it has been fully delineated. Much of the proposed deferral area in Figure 4 is not located in or around equipment/infrastructure. Samples will need to be collected every 500 ft<sup>2</sup> in the proposed deferral area. Only sample locations that would cause a facility deconstruction will be eligible for a deferral. A remediation endpoint for TPH GRO, 1,000 mg/kg is denied. Please, make sure the entire release area is included on the site map, not just the release area inside the facility fence.**
- **Confirmation samples must meet OCD Spill Rule Table 1 standards. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. A variance was approved on May 5th, 2023, for 500 ft<sup>2</sup> floor confirmation samples. The release area will still need confirmation sidewall samples representing no more than 200 ft<sup>2</sup>. Additional SVE wells may need to be installed based on the O&M data (e.g., effective ROI) and/or confirmation soil sample results. System O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 285414.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,

Robert Hamlet

575-748-1283

[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)

### **New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive

Santa Fe, NM 87505

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---

**[EXTERNAL] Rejection of Application for Incident ID nCE2003752717 - Meeting Request**

---

From Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Date Fri 7/12/2024 11:31 AM

To Robert.Hamlet@emnrd.nm.gov <Robert.Hamlet@emnrd.nm.gov>

Cc Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Link, Marianne <MLink@trccompanies.com>; Stoffel, Jared <JStoffel@trccompanies.com>; Gilbert, Bryan <BGilbert@trccompanies.com>; mike.bratcher@emnrd.nm.gov <mike.bratcher@emnrd.nm.gov>

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Mr. Hamlet,

We have received NMOCD's June 11, 2024, notice of its rejection of the Application for Administrative Approval of a Release Notification and Corrective Action (C-141), for Incident ID (n#) nCE2003752717. HEP would like to propose a meeting between NMOCD, HEP, and TRC to discuss NMOCD's comments to the November 2023 *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report*. We are providing some specific questions and discussion points below to help guide this discussion.

- **NMOCD Comment: Please, make sure the entire release area is included on the site map, not just the release area inside the facility fence.** HEP Discussion Point: HEP would appreciate additional information on this request, as Figure 4 of the *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report* presents the entire release area.
- **NMOCD Comments: Additional SVE wells may need to be installed based on the O&M data (e.g., effective ROI) and/or confirmation soil sample results. System O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.** HEP Discussion Point: HEP would appreciate confirmation on whether NMOCD is approving the proposed remedy of SVE for affected soils beneath 4.5 feet bgs.

HEP would like to discuss the above NMOCD comments and NMOCD's remaining comments during the meeting.

Please let us know who will attend the meeting and several dates that you and your team would be available to meet, and we will send out a meeting invite.

*I can now be reached at: [Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com). Please update your records.*

Thank you,

**Melanie Nolan**

Environmental Specialist | Environmental

O 575-748-8972

M 214-605-8303

[Melanie.Nolan@hfsinclair.com](mailto:Melanie.Nolan@hfsinclair.com)  
[www.HFSinclair.com](http://www.HFSinclair.com)

1602 W. Main, Artesia, New Mexico 88210



MIDSTREAM

---

**From:** OCDOnline@state.nm.us <OCDOnline@state.nm.us>  
**Sent:** Tuesday, June 11, 2024 1:54 PM  
**To:** Nolan, Melanie <Melanie.Nolan@HFSinclair.com>  
**Subject:** [EXTERNAL Email]: The Oil Conservation Division (OCD) has rejected the application, Application ID: 285414

**CAUTION:** This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, for the following reasons:

- **The Remediation Plan/Deferral Request is Denied. The proposed deferral area will need to be vertically/horizontally delineated before a deferral request can be considered. Safety should be paramount sampling around equipment and pipelines, use your best judgement. If you believe a certain area will require a deferral, please make sure that it has been fully delineated. Much of the proposed deferral area in Figure 4 is not located in or around equipment/infrastructure. Samples will need to be collected every 500 ft<sup>2</sup> in the proposed deferral area. Only sample locations that would cause a facility deconstruction will be eligible for a deferral. A remediation endpoint for TPH GRO, 1,000 mg/kg is denied. Please, make sure the entire release area is included on the site map, not just the release area inside the facility fence.**
- **Confirmation samples must meet OCD Spill Rule Table 1 standards. Sidewall/Edge samples should be delineated/excavated to 600 mg/kg for chlorides and 100 mg/kg for TPH to define the edge of the release. A variance was approved on May 5th, 2023, for 500 ft<sup>2</sup> floor confirmation samples. The release area will still need confirmation sidewall samples representing no more than 200 ft<sup>2</sup>. Additional SVE wells may need to be installed based on the O&M data (e.g., effective ROI) and/or confirmation soil sample results. System O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.**

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 285414.

Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,  
Robert Hamlet  
575-748-1283  
[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505



**RE: [EXTERNAL] RE: Rejection of Application for Incident ID nCE2003752717 - Meeting Request**

**From** Gilbert, Bryan <BGilbert@trccompanies.com>

**Date** Tue 7/23/2024 6:14 PM

**To** Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>; Nolan, Melanie <Melanie.Nolan@HFSinclair.com>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

**Cc** Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Link, Marianne <MLink@trccompanies.com>; Stoffel, Jared <JStoffel@trccompanies.com>

Thanks Robert! I just sent a revised invite for 8-9 MST (9-10 CST) Friday August 2. Let me know if any other issues and we'll work around them.

Thanks!

**From:** Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>

**Sent:** Tuesday, July 23, 2024 12:47 PM

**To:** Gilbert, Bryan <BGilbert@trccompanies.com>; Nolan, Melanie <Melanie.Nolan@HFSinclair.com>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

**Cc:** Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Link, Marianne <MLink@trccompanies.com>; Stoffel, Jared <JStoffel@trccompanies.com>

**Subject:** RE: [EXTERNAL] RE: Rejection of Application for Incident ID nCE2003752717 - Meeting Request

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I think Mike is also fine with the time on Friday. Thanks

**Robert Hamlet** • Environmental Specialist - Advanced

Environmental Bureau

EMNRD - Oil Conservation Division

506 W. Texas Ave. | Artesia, NM 88210

575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



**From:** Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>

**Sent:** Tuesday, July 23, 2024 11:11 AM

**To:** Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>

**Cc:** Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Link, Marianne

<[MLink@trccompanies.com](mailto:MLink@trccompanies.com)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>

**Subject:** RE: [EXTERNAL] RE: Rejection of Application for Incident ID nCE2003752717 - Meeting Request

Robert and Mike – Do any of the following days/times work for you for next week?

7/29 (Monday): 8-930 MST

8/1 (Thursday): 11-1230 MST

8/2 (Friday): 8-11 MST

I will send out a new invite once we nail down. Thanks!

---

**From:** Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>

**Sent:** Tuesday, July 23, 2024 10:13 AM

**To:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>

**Cc:** Sahba, Arsin M. <[arsin.sahba@hollyfrontier.com](mailto:arsin.sahba@hollyfrontier.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Link, Marianne <[MLink@trccompanies.com](mailto:MLink@trccompanies.com)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>

**Subject:** [EXTERNAL] RE: Rejection of Application for Incident ID nCE2003752717 - Meeting Request

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

We completely understand Mike and will work on getting a new invite out.  
Thank you for letting us know.

*I can now be reached at: [Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com). Please update your records.*

Thank you,

**Melanie Nolan**

Environmental Specialist | Environmental

**O** 575-748-8972

**M** 214-605-8303

[Melanie.Nolan@hfsinclair.com](mailto:Melanie.Nolan@hfsinclair.com)

[www.HFSinclair.com](http://www.HFSinclair.com)

1602 W. Main, Artesia, New Mexico 88210



MIDSTREAM

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**From:** Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>

**Sent:** Tuesday, July 23, 2024 8:17 AM

**To:** Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>; Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>

**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Link, Marianne

<[MLink@trccompanies.com](mailto:MLink@trccompanies.com)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>

**Subject:** Rejection of Application for Incident ID nCE2003752717 - Meeting Request

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Melanie,

I have had a personal issue come up that is going to require me to be out of the office this Wednesday and possibly Thursday, so will need to reschedule our meeting for the HEP Artesia Station. I do have some time on Friday 7/26 or can propose a time for next week.

I sincerely apologize for the inconvenience.

### Mike Bratcher

Incident Supervisor

Environmental Bureau

EMNRD - Oil Conservation Division

506 W. Texas Ave | Artesia, NM 88210

(575) 626-0857 |

[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)

<http://www.emnrd.nm.gov/ocd>

---

**From:** Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>

**Sent:** Friday, July 12, 2024 11:11 AM

**To:** Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>

**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Link, Marianne <[MLink@trccompanies.com](mailto:MLink@trccompanies.com)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>

**Subject:** Rejection of Application for Incident ID nCE2003752717 - Meeting Request

Melanie,

Why don't you shoot for Wednesday July 24<sup>th</sup> @ 10:00 a.m. (Mountain Time) if that works with everybody's schedule. Setup a Teams Meeting and invite myself and Mike Bratcher. If something comes up we can always reschedule for a different time/date. Thanks

**Robert Hamlet** • Environmental Specialist - Advanced

Environmental Bureau

EMNRD - Oil Conservation Division

506 W. Texas Ave. | Artesia, NM 88210

575.909.0302 | [robert.hamlet@state.nm.us](mailto:robert.hamlet@state.nm.us)

<http://www.emnrd.state.nm.us/OCD/>



---

**From:** Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>

**Sent:** Friday, July 12, 2024 9:31 AM

**To:** Hamlet, Robert, EMNRD <[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)>  
**Cc:** Sahba, Arsin <[Arsin.Sahba@HFSinclair.com](mailto:Arsin.Sahba@HFSinclair.com)>; Leik, Jason <[Jason.Leik@HFSinclair.com](mailto:Jason.Leik@HFSinclair.com)>; Link, Marianne <[MLink@trccompanies.com](mailto:MLink@trccompanies.com)>; Stoffel, Jared <[JStoffel@trccompanies.com](mailto:JStoffel@trccompanies.com)>; Gilbert, Bryan <[BGilbert@trccompanies.com](mailto:BGilbert@trccompanies.com)>; Bratcher, Michael, EMNRD <[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)>  
**Subject:** [EXTERNAL] Rejection of Application for Incident ID nCE2003752717 - Meeting Request

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Mr. Hamlet,

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- **NMOCD Comments: Additional SVE wells may need to be installed based on the O&M data (e.g., effective ROI) and/or confirmation soil sample results. System O&M and performance monitoring data will be documented in annual O&M reports, which will be prepared and submitted to NMOCD within 90 days of the end of each calendar year during which system O&M occurs.** HEP Discussion Point: HEP would appreciate confirmation on whether NMOCD is approving the proposed remedy of SVE for affected soils beneath 4.5 feet bgs.

HEP would like to discuss the above NMOCD comments and NMOCD's remaining comments during the meeting.

Please let us know who will attend the meeting and several dates that you and your team would be available to meet, and we will send out a meeting invite.

*I can now be reached at: [Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com). Please update your records.*

Thank you,

**Melanie Nolan**

Environmental Specialist | Environmental

**O** 575-748-8972

**M** 214-605-8303

[Melanie.Nolan@hfsinclair.com](mailto:Melanie.Nolan@hfsinclair.com)

[www.HFSinclair.com](http://www.HFSinclair.com)

1602 W. Main, Artesia, New Mexico 88210



MIDSTREAM

**From:** [OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us) <[OCDOnline@state.nm.us](mailto:OCDOnline@state.nm.us)>  
**Sent:** Tuesday, June 11, 2024 1:54 PM  
**To:** Nolan, Melanie <[Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com)>  
**Subject:** The Oil Conservation Division (OCD) has rejected the application, Application ID: 285414

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, for the following reasons:

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Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you,  
Robert Hamlet  
575-748-1283  
[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)

### **New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive  
Santa Fe, NM 87505

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---

## HEP Artesia Station West Former Tank 970 - Incident ID nCE2003752717 - Meeting Summary

---

**From** Gilbert, Bryan <BGilbert@trccompanies.com>

**Date** Wed 8/7/2024 5:35 PM

**To** Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>

**Cc** Stoffel, Jared <JStoffel@trccompanies.com>; Richardson, Paul <Paul.Richardson@HFSinclair.com>; Link, Marianne <MLink@trccompanies.com>; Sahba, Arsin M. <arsin.sahba@hollyfrontier.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Thank you for taking the time to meet with us on August 2, 2024, regarding the Artesia Station West – Former Tank 970 site (Incident ID nCE2003752717). The virtual meeting was attended by the following:

- Holly Energy Partners (HEP) and HF Sinclair: Jason Leik, Arsin Sahba, and Melanie Nolan
- NMOCD: Robert Hamlet and Michael Bratcher
- TRC: Bryan Gilbert, Jared Stoffel, and Marianne Link

TRC provided a summary of the project background and site characterization results and then discussed NMOCD's June 2024 comments to the November 2023 *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report* (Recommendation Report). A summary of the key discussion points is provided below.

### Discussion of Release Area:

- In response to NMOCD's comment that the entire release area be shown on the site map, TRC provided clarification that the entire release and delineation areas were included on Figure 2 of the November 2023 Recommendation Report.
- NMOCD inquired on the overall basis of delineation, particularly along the southern and eastern property boundaries. TRC and HEP clarified that the delineation area is located within the site boundaries based on historical site characterization results and the presence of a berm along the site southern and eastern site boundaries. TRC also noted that a road is present immediately east of the site and a lease road is present immediately south of the site.

### Discussion of Proposed Deferral Area:

- TRC and HEP clarified that the deferral area is based on site characterization results and sidewall confirmation soil sample results and that deferral is required due to safety (above/below ground infrastructure) and security (fencing/berms) associated with facility operation.
- Regarding NMOCD's request for a sampling frequency of one sample every 500 square feet within the deferral area, NMOCD acknowledged that there is no regulatory basis for this request and that it may not be appropriate or necessary. However, NMOCD indicated there may not be enough soil sample data within the deferral area, particularly near boring SB-3, and that the deferral area can be better "bounded" to the north.
- NMOCD requested additional photographs of the proposed deferral areas to demonstrate that visually apparent crude oil-affected soil is not present at the ground surface that might pose a risk to site workers or wildlife (e.g., birds).

### Discussion of Confirmation Sampling:

- In response to NMOCD's request that sidewall confirmation samples meet Reclamation Standards to define the edge of release, TRC and HEP indicated that the use of Closure Criteria (for sites with groundwater deeper than 100 feet bgs) was proposed in the July 2022 Workplan, which was approved by NMOCD in January 2023.
- NMOCD indicated a preference for additional soil data to demonstrate that crude oil-affected soil does not extend beyond the site boundaries.

- With respect to delineation to the west, TRC acknowledged that TPH concentrations at HA-West exceed Reclamation Standards in the upper 4 feet, but that lateral delineation beneath 4 feet was provided by soil sample data from nearby boring SB-2, which was drilled to 102 feet bgs.
- NMOCD requested additional delineation west of borings HA-West and SB-2 (i.e., west of the former Tank 970 berm) in the vicinity of active Tank 974. HEP indicated safe access may be limited east of Tank 974. NMOCD clarified that the boring may be drilled west of Tank 974 along the western site boundary.
- In response to NMOCD's request for sidewall confirmation samples every 200 square feet, TRC provided clarification that a sidewall confirmation sample frequency of one sample per 100 linear feet was proposed in the July 2022 Workplan, which was approved by NMOCD in January 2023. NMOCD acknowledged that the request for one sample per 100 linear feet was approved by OCD and that the sidewall sampling frequency of one sample per 100 linear feet was adequate.

#### Discussion of SVE Implementation

- TRC concurred with NMOCD's request that additional SVE wells may be required pending SVE O&M data and confirmation soil sample results, and noted that this iterative approach is typical of SVE remediation systems.
- NMOCD inquired on the large SVE effective radius of influence (ROI) observed during extraction at well VW-04 (i.e., 185 feet). TRC indicated the overall large effective ROIs observed during the pilot test may be due, in part, to the liner installed in the excavation prior to backfilling (i.e., the liner promotes lateral soil vapor movement). TRC also indicated the range in effective ROIs observed during the pilot test may be due to lithologic heterogeneity between the wells and/or slight changes in how the SVE wells "communicate" with the formation.

Of note, HEP reiterated that they are not requesting site closure at this time. Site closure will be pursued upon closure of the active facility and following additional site characterization and remediation/reclamation within the deferral area, as necessary.

Please let us know if you have any revisions or additions to the above summary. In the next few weeks, we will provide a response to NMOCD including photographs of the deferral area, plan for proposed boring(s), and a request for NMOCD approval of SVE implementation.

Bryan Gilbert, P.G.  
Austin Office ECR Practice Leader



505 E. Huntland Drive, Suite 250, Austin, TX 78752

C: 925.699.6184 | F: 512.329.8750

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [TRCcompanies.com](#)



[EXTERNAL] Tank 970 FW: Transaction Receipt from EMNRD OCD for \$150.00 (USD)

From Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Date Fri 9/13/2024 4:41 PM

To Stoffel, Jared <JStoffel@trccompanies.com>; Link, Marianne <MLink@trccompanies.com>; Gilbert, Bryan <BGilbert@trccompanies.com>

Cc Richardson, Paul <Paul.Richardson@HFSinclair.com>; Leik, Jason <Jason.Leik@HFSinclair.com>

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

The Response to NMOCD has been submitted for Tank 970.

*I can now be reached at: [Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com). Please update your records.*

Thank you,

**Melanie Nolan**

Environmental Specialist | Environmental

**O** 575-748-8972

**M** 214-605-8303

[Melanie.Nolan@hfsinclair.com](mailto:Melanie.Nolan@hfsinclair.com)

[www.HFSinclair.com](http://www.HFSinclair.com)

1602 W. Main, Artesia, New Mexico 88210



MIDSTREAM

**From:** Auto-Receipt <noreply@mail.authorize.net>

**Sent:** Friday, September 13, 2024 2:26 PM

**To:** Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

**Subject:** [EXTERNAL Email]: Transaction Receipt from EMNRD OCD for \$150.00 (USD)

**CAUTION:** This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Order Information

Description: Goods or Services

PO Number OD850-240913-C-1410

**Billing Information**

MELANIE NOLAN  
2828 N HARWOOD SUITE 1300  
Dallas, Texas 75201  
US  
[melanie.nolan@hfsinclair.com](mailto:melanie.nolan@hfsinclair.com)  
2146058303

**Shipping Information**

**Total: \$150.00 (USD)**

Payment Information

Date/Time: 13-Sep-2024 14:25:48 MDT  
Transaction ID: 80625409324  
Payment Method: MasterCard xxxx2990  
Transaction Type: Purchase  
Auth Code: 090598

Merchant Contact Information

EMNRD OCD  
Santa Fe, NM 87505  
US  
[ocdfees@state.nm.us](mailto:ocdfees@state.nm.us)

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[EXTERNAL] The Oil Conservation Division (OCD) has approved the application, Application ID: 383469

From Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Date Wed 10/2/2024 4:18 PM

To Gilbert, Bryan <BGilbert@trccompanies.com>; Link, Marianne <MLink@trccompanies.com>; Leik, Jason <Jason.Leik@HFSinclair.com>; Richardson, Paul <Paul.Richardson@HFSinclair.com>

Cc Stoffel, Jared <JStoffel@trccompanies.com>

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Please see below concerning the Tank 970 SVE approval.

*I can now be reached at: [Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com). Please update your records.*

Thank you,

**Melanie Nolan**

Environmental Specialist | Environmental

**O** 575-748-8972

**M** 214-605-8303

[Melanie.Nolan@hfsinclair.com](mailto:Melanie.Nolan@hfsinclair.com)

[www.HFSinclair.com](http://www.HFSinclair.com)

1602 W. Main, Artesia, New Mexico 88210



MIDSTREAM

**From:** OCDOnline@state.nm.us <OCDOnline@state.nm.us>

**Sent:** Wednesday, October 2, 2024 1:38 PM

**To:** Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

**Subject:** The Oil Conservation Division (OCD) has approved the application, Application ID: 383469

**CAUTION:** This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, with the following conditions:

- **The Remediation Plan/Pilot Test Full SVE Report is Conditionally Approved. The OCD wants to reaffirm that the SVE System may need to be augmented depending on the data collected. Additional SVE wells may need to be installed based on the SVE operation and maintenance (O&M) data. The OCD may request the verification of light end hydrocarbon depletion through additional borehole installations in between the SVE vent holes to ensure that the light end hydrocarbon removal has taken place. This would require additional sampling at the corresponding depths to ensure removal of light end hydrocarbons.**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,

Robert Hamlet

575-748-1283

[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)

**New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive

Santa Fe, NM 87505

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Outlook

---

**Subject: Full-Scale SVE System Update and Extension Request - Former Tank 970/Artesia Station West Facility (Incident ID nCE2003752717)**

---

**From** Link, Marianne <MLink@trccompanies.com>**Date** Wed 2/26/2025 9:35 AM**To** Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Bisbey-Kuehn, Elizabeth A. <ebisbeykuehn@nmslo.gov>; Knight, Tami C. <tknight@nmslo.gov>**Cc** Paul Richardson <paul.richardson@hfsinclair.com>; Jason Leik <jason.leik@hfsinclair.com>; Melanie Nolan <melanie.nolan@hfsinclair.com>; Gilbert, Bryan <>BGilbert@trccompanies.com>

In the September 12, 2024, *Response to New Mexico Oil Conservation Division Denial Comments to the November 2023 Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report*, Holly Energy Partners – Operating, L.P. (HEP) proposed installing a full-scale SVE system within 120 days of NMOCD approval pending the availability and installation of an electrical power drop by a local power utility. NMOCD conditionally approved the September 2024 letter (and the November 2023 *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report*) on October 2, 2024, with the caveat that additional SVE wells and confirmation soil sampling may be needed based on the SVE operation and maintenance data.

HEP initiated the full-scale SVE system installation when site preparation activities were commenced in December 2024. The main SVE system components were moved from another facility and staged at the site on December 19, 2024. HEP has selected and is currently initiating contracts with the local power utility (Central Valley Electric Cooperative) to install an electrical power drop and a local electrical subcontractor to run an electrical conduit from the newly installed meter to the SVE treatment system. Once power is supplied to the SVE system, HEP will complete the installation, commissioning, and startup of the SVE system. The additional soil delineation of the release area utilizing a shallow boring to the north and a deep boring to the west has been scheduled for early April 2025.

**A 90-day extension (i.e., to May 3, 2025) is requested to complete the installation and start-up of the full-scale SVE system pending the installation of an electrical power drop by a local power utility.**

As delays with the local power utility are common, TRC and HEP will keep the NMOCD and NMSLO updated on the status of the SVE system installation and startup. Please let us know if you have any questions or comments about this update and extension request.

Thank you,

**Marianne Link**

Senior Project Manager

*Remotely from Durham, NC*



505 East Huntland Drive, Suite 250, Austin, Texas 78752

C 919.943.2631 | [mlink@trccompanies.com](mailto:mlink@trccompanies.com)

[LinkedIn](#) | [Instagram](#) | [TRCcompanies.com](https://www.trccompanies.com)



Outlook

RE: [EXTERNAL] Subject: Full-Scale SVE System Update and Extension Request - Former Tank 970/Artesia Station West Facility (Incident ID nCE2003752717)

From Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

Date Thu 2/27/2025 9:42 AM

To Link, Marianne <MLink@trccompanies.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>; Bisbey-Kuehn, Elizabeth A. <ebisbeykuehn@nmslo.gov>; Knight, Tami C. <tknight@nmslo.gov>

Cc Paul Richardson <paul.richardson@hfsinclair.com>; Jason Leik <jason.leik@hfsinclair.com>; Melanie Nolan <melanie.nolan@hfsinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Marianne,

The date of discovery for this incident is listed as 1/22/2020 and was discovered as a historic ongoing release. An SVE system for this site was discussed as early as 2021 and confirmed in an approval on 1/17/2023. This is not an extremely remote site and has electricity all around it. If nothing else, set a fuel tank and generator. At this time, OCD will conditionally approve this extension. The condition is that the system must be fully operational not later than **May 3, 2025** or it will be referred for enforcement action and/or an alternative remediation process will be required. Also, provide documentation as to when CVE was contacted.

Thank you,

**Mike Bratcher**

Incident Supervisor

Environmental Bureau

EMNRD - Oil Conservation Division

506 W. Texas Ave | Artesia, NM 88210

(575) 626-0857 |

[mike.bratcher@emnrd.nm.gov](mailto:mike.bratcher@emnrd.nm.gov)

<http://www.emnrd.nm.gov/ocd>

**From:** Link, Marianne <MLink@trccompanies.com>

**Sent:** Wednesday, February 26, 2025 7:36 AM

**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Bisbey-Kuehn, Elizabeth A. <ebisbeykuehn@nmslo.gov>; Knight, Tami C. <tknight@nmslo.gov>

**Cc:** Paul Richardson <paul.richardson@hfsinclair.com>; Jason Leik <jason.leik@hfsinclair.com>; Melanie Nolan <melanie.nolan@hfsinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>

**Subject:** [EXTERNAL] Subject: Full-Scale SVE System Update and Extension Request - Former Tank 970/Artesia Station West Facility (Incident ID nCE2003752717)

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In the September 12, 2024, *Response to New Mexico Oil Conservation Division Denial Comments to the November 2023 Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report*, Holly Energy Partners – Operating, L.P. (HEP) proposed installing a full-scale SVE system within 120 days of NMOCD approval pending the availability and installation of an electrical power drop by a local power utility. NMOCD conditionally approved the September 2024 letter (and the November 2023 *Remediation and Pilot Test Summary and Full-Scale Soil Vapor Extraction System Recommendation Report*) on October 2, 2024, with the caveat that additional SVE wells and confirmation soil sampling may be needed based on the SVE operation and maintenance data.

HEP initiated the full-scale SVE system installation when site preparation activities were commenced in December 2024. The main SVE system components were moved from another facility and staged at the site on December 19, 2024. HEP has selected and is currently initiating contracts with the local power utility (Central Valley Electric Cooperative) to install an electrical power drop and a local electrical subcontractor to run an electrical conduit from the newly installed meter to the SVE treatment system. Once power is supplied to the SVE system, HEP will complete the installation, commissioning, and startup of the SVE system. The additional soil delineation of the release area utilizing a shallow boring to the north and a deep boring to the west has been scheduled for early April 2025.

**A 90-day extension (i.e., to May 3, 2025) is requested to complete the installation and start-up of the full-scale SVE system pending the installation of an electrical power drop by a local power utility.**

As delays with the local power utility are common, TRC and HEP will keep the NMOCD and NMSLO updated on the status of the SVE system installation and startup. Please let us know if you have any questions or comments about this update and extension request.

Thank you,

**Marianne Link**

Senior Project Manager

*Remotely from Durham, NC*



505 East Huntland Drive, Suite 250, Austin, Texas 78752

C 919.943.2631 | [mblink@trccompanies.com](mailto:mblink@trccompanies.com)

[LinkedIn](#) | [Instagram](#) | [TRCcompanies.com](http://TRCcompanies.com)



---

[EXTERNAL] The Oil Conservation Division (OCD) has accepted the application, Application ID: 453698

---

From Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Date Mon 4/21/2025 4:23 PM

To Gilbert, Bryan <BGilbert@trccompanies.com>; Link, Marianne <MLink@trccompanies.com>

Cc Richardson, Paul <paul.richardson@hfsinclair.com>

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

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For your records. Notification of Sampling.

*I can now be reached at: [Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com). Please update your records.*

Thank you,

**Melanie Nolan**

Environmental Specialist | Environmental

**O** 575-748-8972

**M** 214-605-8303

[Melanie.Nolan@hfsinclair.com](mailto:Melanie.Nolan@hfsinclair.com)

[www.HFSinclair.com](http://www.HFSinclair.com)

1602 W. Main, Artesia, New Mexico 88210



MIDSTREAM

---

**From:** OCDOnline@state.nm.us <OCDOnline@state.nm.us>

**Sent:** Monday, April 21, 2025 9:27 AM

**To:** Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 453698

**CAUTION:** This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has received the submitted *Notification for (Final) Sampling of a Release (C-141N)*, for incident ID (n#) nCE2003752717.

The sampling event is expected to take place:

**When:** 04/23/2024 @ 09:30

**Where:** G-28-18S-28E 0 FNL 0 FEL (32.71917,-104.18119)

**Additional Information:** Sampling will include a HSA/Air Rotary drilling sample to 102ft bgs. Samples every 5 feet. Decon between samples.

Hand-auger boring at HA-North-2 to 4ft. 1 sample collected.

Robert Nehay - 915-222-1322

Marianne Link - 919-943-2631

Paul Richardson - 918-345-2036

**Additional Instructions:** Latitude: 32.71917 Longitude: -104.18119

Hwy 82 East out of Artesia. Turn right on Hilltop. Stay on Hilltop till intersects Depco Road. Turn Right. Location is on right hand side off of Depco Road.

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

### **New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive

Santa Fe, NM 87505

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Outlook

---

**[EXTERNAL] Artesia Station Update (Incident Number nCE2003752717)**

---

From Richardson, Paul <Paul.Richardson@HFSinclair.com>

Date Fri 6/13/2025 3:55 PM

To Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Buchanan, Michael, EMNRD <michael.buchanan@emnrd.nm.gov>

Cc Link, Marianne <MLink@trccompanies.com>; Leik, Jason <Jason.Leik@hollyfrontier.com>

3 attachments (8 MB)

Table 1 Summary of Preliminary Soil Sample Analytical Results.pdf; Figure 1.pdf; 2025-05-27 Catalyst Blown 1.jpg;

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Good afternoon. HEP is presenting the following information as an update on the remediation efforts at the Former Tank 970/Artesia Station West facility (Site) (Incident Number nCE2003752717). The SVE system has been running intermittently since start up the week of April 21, 2025. The intermittent operation has occurred due to the effort to get the system running reliably again following years of sitting idle. Various mechanical, electrical and telemetry issues have been remedied to date. However, it was determined on May 27, 2025, that the thermal oxidizer catalyst has been damaged and must be replaced. We have ordered a new catalyst from the manufacturer and expect it to be delivered in 6-8 weeks, at which time we will install the new catalyst and turn the system back on.

Running the SVE without the thermal oxidizer represents a safety risk to site personnel by venting soil vapors into the breathing zone of work areas. Running the thermal oxidizer without the catalyst would likely also result in an exceedance of the emission limits set forth in the NOI for the facility as it takes a significant volume of propane to operate the thermal oxidizer without the catalyst. We will update OCD when we have a firm date to replace the catalyst.

### **Additional Soil Delineation Preliminary Findings**

In accordance with HEP's September 12, 2024, *Response to New Mexico Oil Conservation Division's (NMOCD) June 2024 Denial Comments*, two additional borings were advanced at the Site to better delineate hydrocarbons in soil west and north of the release area. The proposed boring locations (SB-West and HA-North-2) were provided to NMOCD and the New Mexico State Land Office (NMSLO) Environmental Compliance Office (ECO) in an email dated December 5, 2024, and are presented in **Figure 1**.

The proposed "deep" boring, SB-West, was advanced along the western Site boundary (i.e., west of the former Tank 970 berm). The boring was drilled to a total depth of 102 feet below ground surface (bgs). A hand auger was advanced to a depth of five (5) feet bgs to ensure utilities were not present near the ground surface prior to drilling. Hollow-stem augers were used to drill from 5 to 45 feet bgs until refusal was encountered, then air rotary drilling methods were used from 45 to 102 feet bgs. The lithology, field observations (i.e., hydrocarbon odor and staining), and photo-ionization detector (PID) readings were recorded. Odor or staining were not present and PID readings ranged from zero to 1.6 parts per million

(ppm) in SB-West. Soil samples were collected for laboratory analysis at 5-foot intervals (including one sample from 3 to 5 feet). A duplicate sample was taken between 100 and 102 feet bgs. Following drilling, the borehole was backfilled to the surface with cement-bentonite grout. Soil cuttings were containerized in labeled 55-gallon drums pending off-site disposal.

The proposed hand auger boring, HA-North-2, was advanced to a depth of four (4) feet bgs immediately north of boring SB-North to delineate hydrocarbon concentrations above the Reclamation Standard in the upper 4 feet. The lithology, field observations (i.e., hydrocarbon odor and staining), and PID readings were recorded. Odor or staining were not present and all PID readings were zero ppm in HA-North-2. One soil sample was collected for laboratory analysis at a depth of 4 feet bgs and one duplicate sample was collected at a depth of 4 feet. The borehole was backfilled with soil cuttings.

The soil samples were submitted to Eurofins Environment Testing in Midland, Texas for analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) by United States Environmental Protection Agency (EPA) Method SW8260, total petroleum hydrocarbons (TPH) by EPA Method 8015M, and chloride by EPA Method 300. Preliminary analytical results for samples collected at boring locations SB-West and HA-North-2 are summarized in the attached **Table 1**. Detected concentrations and the non-detect reporting limits of BTEX, TPH, and chloride were below the NMOCD Closure Criteria for sites with groundwater at a depth greater than 100 feet bgs in all soil samples collected from both soil borings.

A summary will be provided in a letter report due on July 1, 2025 (60 days following receipt of the analytical laboratory report).

Thank you,

Paul

### Paul Richardson

Environmental Specialist | Corporate Environmental

**O** 918.594.3267

**M** 918.345.2036

[Paul.Richardson@hfsinclair.com](mailto:Paul.Richardson@hfsinclair.com)

[www.HFSinclair.com](http://www.HFSinclair.com)

3333 Southwest Blvd, Tulsa, OK 74107



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[EXTERNAL] Tank 970 Report

From Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Date Tue 7/1/2025 2:06 PM

To Gilbert, Bryan <BGilbert@trccompanies.com>; Link, Marianne <MLink@trccompanies.com>; Richardson, Paul <paul.richardson@hfsinclair.com>; Leik, Jason <Jason.Leik@hollyfrontier.com>; Clark, Darija <dclark@trccompanies.com>

1 attachment (277 KB)

OCDReceiptOfFeePayment.pdf;

This is an **External** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

The report has been submitted to NMOCD, confirmation attached.

*I can now be reached at: [Melanie.Nolan@HFSinclair.com](mailto:Melanie.Nolan@HFSinclair.com). Please update your records.*

Thank you,

**Melanie Nolan**

Environmental Specialist | Environmental

O 575-748-8972

M 214-605-8303

[Melanie.Nolan@hfsinclair.com](mailto:Melanie.Nolan@hfsinclair.com)

[www.HFSinclair.com](http://www.HFSinclair.com)

1602 W. Main, Artesia, New Mexico 88210



MIDSTREAM

From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>

Sent: Tuesday, July 1, 2025 9:44 AM

To: Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Subject: [EXTERNAL Email]: OCD Receipt of Fee Application Payment

**CAUTION:** This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is

safe.

Thank you for your fee application payment! Your receipt is attached.

**PO Number:** O51J4-250701-C-1410  
**Payment Date:** 7/1/2025  
**Payment Amount:** \$150.00  
**Payment Type:** Credit Card

---

**Application Type:** Application for administrative approval of a release notification and corrective action  
**Fee Amount:** \$150.00  
**Application Status:** Under OCD Review

---

**OGRID:** 282505  
**First Name:** Melanie  
**Last Name:** Nolan  
**Email:** [melanie.nolan@hfsinclair.com](mailto:melanie.nolan@hfsinclair.com)

---

**IMPORTANT:** If you are mailing or delivering your application, you must print and include your receipt of payment as the first page on your application. All mailed and delivered applications must be sent to the following address: 1220 S. St. Francis Dr., Santa Fe, NM 87505. For inquiries, reference the PO Number listed above.

Oil Conservation Division \* 1220 South St. Francis Drive \* Santa Fe, New Mexico 87505  
(505) 476-3441 \* [ocd.fees@state.nm.us](mailto:ocd.fees@state.nm.us) \* [www.emnrd.nm.gov/OCD](http://www.emnrd.nm.gov/OCD)

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---

[EXTERNAL] The Oil Conservation Division (OCD) has approved the application, Application ID: 480557

---

From Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

Date Fri 9/5/2025 2:38 PM

To Link, Marianne <MLink@trccompanies.com>; Richardson, Paul <paul.richardson@hfsinclair.com>; Gilbert, Bryan <BGilbert@trccompanies.com>

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Received today from OCD.. See below.

---

**From:** OCDOnline@state.nm.us <OCDOnline@state.nm.us>

**Sent:** Friday, September 5, 2025 11:05 AM

**To:** Nolan, Melanie <Melanie.Nolan@HFSinclair.com>

**Subject:** The Oil Conservation Division (OCD) has approved the application, Application ID: 480557

**CAUTION:** This email originated from outside of the HF Sinclair organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern (c/o Melanie Nolan for HOLLY ENERGY PARTNERS - OPERATING, LP),

The OCD has approved the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nCE2003752717, with the following conditions:

- **The Additional Soil Delineation Summary Report will be accepted for record and placed in the incident file. Please continue to implement the full-scale SVE system for the deeper crude oil affected soil impacts. Please contact the OCD if you have any additional questions or concerns.**

The signed C-141 can be found in the OCD Online: Imaging under the incident ID (n#).

If you have any questions regarding this application, please contact me.

Thank you,

Robert Hamlet

575-748-1283

[Robert.Hamlet@emnrd.nm.gov](mailto:Robert.Hamlet@emnrd.nm.gov)

**New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive

Santa Fe, NM 87505

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RE: [EXTERNAL] Notice of Field Work Planned at the Former Tank 970/Artesia Station West Facility (Incident ID nCE2003752717)

From Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>

Date Wed 11/27/2024 5:13 PM

To Link, Marianne <MLink@trccompanies.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>; Bisbey-Kuehn, Elizabeth A. <ebisbeykuehn@nmslo.gov>; tami.knight@nmslo.gov <tami.knight@nmslo.gov>

Cc Paul Richardson <paul.richardson@hfsinclair.com>; Melanie Nolan <melanie.nolan@hfsinclair.com>; Jason Leik <jason.leik@hfsinclair.com>; Gilbert, Bryan <>BGilbert@trccompanies.com>; Stoffel, Jared <JStoffel@trccompanies.com>

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**ALWAYS** hover over the link to preview the actual URL/site and confirm its legitimacy.

Thank you for the notification.

**Mike Bratcher**

Incident Supervisor  
Environmental Bureau  
EMNRD - Oil Conservation Division  
506 W. Texas Ave | Artesia, NM 88210  
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**From:** Link, Marianne <MLink@trccompanies.com>

**Sent:** Wednesday, November 27, 2024 12:19 PM

**To:** Hamlet, Robert, EMNRD <Robert.Hamlet@emnrd.nm.gov>; Bratcher, Michael, EMNRD <mike.bratcher@emnrd.nm.gov>; Bisbey-Kuehn, Elizabeth A. <ebisbeykuehn@nmslo.gov>; tami.knight@nmslo.gov

**Cc:** Paul Richardson <paul.richardson@hfsinclair.com>; Melanie Nolan <melanie.nolan@hfsinclair.com>; Jason Leik <jason.leik@hfsinclair.com>; Gilbert, Bryan <>BGilbert@trccompanies.com>; Stoffel, Jared <JStoffel@trccompanies.com>

**Subject:** [EXTERNAL] Notice of Field Work Planned at the Former Tank 970/Artesia Station West Facility (Incident ID nCE2003752717)

**CAUTION:** This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

With this email, HF Sinclair Midstream is providing notice that field work is planned at the above-referenced facility from December 3-5, 2024. The scope of work planned in December 2024 includes the following tasks:

1. Constructing concrete/caliche pads for the placement of the thermal oxidizer, propane tanks, and soil vapor extraction (SVE) system enclosure at the site
2. Moving the thermal oxidizer, propane tanks, and soil vapor extraction (SVE) system enclosure to the site and placing them on prepared pads.

Please contact me at (919) 943-2631 or Paul Richardson at (918) 345-2036 if you have any questions.

Thank you,

**Marianne Link, PG**  
Senior Project Manager



505 E. Huntland Dr., Suite 250, Austin, TX 78752


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## **Appendix B: SVE System Photos**



## Photograph Log

<b>Client Name:</b> HF Sinclair Midstream		<b>Subject Property Location:</b> Former Tank 970/Artesia Station West Artesia, New Mexico	<b>Project No.:</b> 705860
<b>Photo No.</b> 1	<b>Date</b> March 2025		
<b>Description:</b> Looking north toward the thermal oxidizer and SVE system conex.			

<b>Photo No.</b> 2	<b>Date</b> March 2025		
<b>Description:</b> Looking east toward the system propane tanks.			

## **Appendix C: SVE System O&M Forms**



**T 970 SVE System O&M Data Sheet**  
**HF Sinclair Midstream (HEP) Artesia Station West**  
**Artesia, New Mexico**  
**32°43'08.9"N 104°10'52.8"W**

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	R. Nishu		
Date	04/22/25		
Time	0810		
Wells operating on arrival	1-4		
Oxidizer Hour Meter (hours)	19386		
SVE Blower Hour Meter (hours) resets	0		
(Manifold) Dilution Air Valve Position (% closed)	60%		<25 LEL ~60% CLOSED
Well Valve Position (%)	100		100% open now
SVE Vacuum (inches of WC)	-32		Off Silencer
Ambient Air Temperature (°F)	67		Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)			
Oxidizer Outlet Temperature (°F)			
<b>Propane</b>			
Tank 1 Propane Level (%)	80		
Tank 2 Propane Level (%)	80		
Propane Tank Regulator Pressure (PSI)	10		10 PSI
Oxidizer Regulator Pressure (PSI)	5		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)			
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
VE-01 WC (inches of Hg)	-20		
VE-02 WC (inches of Hg)	-20		
VE-03 WC (inches of Hg)	-20		
VE-04 WC (inches of Hg)	-20		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	19		
Influent O <sub>2</sub> (%)	18.9		
Influent H <sub>2</sub> S (ppm)	0.1		
Influent CO (ppm)	0		
Influent CO <sub>2</sub> (ppm)	710000		
Influent Hydrocarbons (ppmV)	914		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	1		
Effluent O <sub>2</sub> (%)	17.9		
Effluent H <sub>2</sub> S (ppm)	0		
Effluent CO (ppm)	0		
Influent O <sub>2</sub> (ppm)	710000		
Effluent Hydrocarbons (ppmV)	0.1		1% of influent
<b>Notes</b>			



**T 970 SVE System O&M Data Sheet**  
**HF Sinclair Midstream (HEP) Artesia Station West**  
**Artesia, New Mexico**  
**32°43'08.9"N 104°10'52.8"W**

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	R. N. Martinez		
Date	01/23/21		
Time	1400		
Wells operating on arrival	1-4		
Oxidizer Hour Meter (hours)	19410		
SVE Blower Hour Meter (hours) resets			
(Manifold) Dilution Air Valve Position (% closed)	50%		<25 LEL ~60% CLOSED
Well Valve Position (%)	100%		100% open now
SVE Vacuum (inches of WC)	86.3		Off Silencer
Ambient Air Temperature (°F)	82.0		Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)	600		
Oxidizer Outlet Temperature (°F)	900		
<b>Propane</b>			
Tank 1 Propane Level (%)	77		
Tank 2 Propane Level (%)	77		
Propane Tank Regulator Pressure (PSI)	10		10 PSI
Oxidizer Regulator Pressure (PSI)	5		5 PSI ✓
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)	3.8		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
VE-01 WC (inches of Hg)	-10		
VE-02 WC (inches of Hg)	-10		
VE-03 WC (inches of Hg)	-10		
VE-04 WC (inches of Hg)	-10		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	61		
Influent O <sub>2</sub> (%)	20.4		
Influent H <sub>2</sub> S (ppm)	0		
Influent CO (ppm)	2		
Influent CO <sub>2</sub> (ppm)	210000		
Influent Hydrocarbons (ppmV)	582.2		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	3		
Effluent O <sub>2</sub> (%)	15.5		
Effluent H <sub>2</sub> S (ppm)	0		
Effluent CO (ppm)	4		
Influent O <sub>2</sub> (ppm)	165		
Effluent Hydrocarbons (ppmV)	3.0		1% of influent
<b>Notes</b>			



**T 970 SVE System O&M Data Sheet**  
**HF Sinclair Midstream (HEP) Artesia Station West**  
**Artesia, New Mexico**  
**32°43'08.9"N 104°10'52.8"W**

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	<i>Robert [unclear]</i>		
Date	<i>4/21/23</i>		
Time	<i>1000</i>		
Wells operating on arrival	<i>1-4</i>		
Oxidizer Hour Meter (hours)	<i>19418</i>		
SVE Blower Hour Meter (hours) resets	<i>35.0</i>		
(Manifold) Dilution Air Valve Position (% closed)	<i>50%</i>		<25 LEL ~60% CLOSED
Well Valve Position (%)	<i>100</i>		100% open now
SVE Vacuum (inches of WC)			Off Silencer
Ambient Air Temperature (°F)	<i>80</i>		Weather Report
Barometric Pressure (inches Hg)	<i>30.1</i>		Weather Report
Oxidizer Inlet Temperature (°F)	<i>602</i>		
Oxidizer Outlet Temperature (°F)	<i>813</i>		
<b>Propane</b>			
Tank 1 Propane Level (%)	<i>72</i>		
Tank 2 Propane Level (%)	<i>70</i>		
Propane Tank Regulator Pressure (PSI)	<i>104.5</i>		10 PSI
Oxidizer Regulator Pressure (PSI)	<i>5</i>		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)	<i>813</i>		Catalytic mode 950 F
Velocity Pressure (inches of WC)	<i>2.2</i>		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
VE-01 WC (inches of Hg)	<i>2</i>		
VE-02 WC (inches of Hg)	<i>2</i>		
VE-03 WC (inches of Hg)	<i>2</i>		
VE-04 WC (inches of Hg)	<i>2</i>		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	<i>12</i>		
Influent O <sub>2</sub> (%)	<i>20.0</i>		
Influent H <sub>2</sub> S (ppm)	<i>0</i>		
Influent CO (ppm)	<i>0</i>		
Influent CO <sub>2</sub> (ppm)	<i>210000</i>		
Influent Hydrocarbons (ppmV)	<i>678</i>		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	<i>3</i>		
Effluent O <sub>2</sub> (%)	<i>17.2</i>		
Effluent H <sub>2</sub> S (ppm)	<i>0</i>		
Effluent CO (ppm)	<i>0</i>		
<i>CO2</i> Influent O <sub>2</sub> (ppm)	<i>210000</i>		
Effluent Hydrocarbons (ppmV)	<i>2.4</i>		1% of influent
<b>Notes</b>			



**T 970 SVE System O&M Data Sheet**  
**HF Sinclair Midstream (HEP) Artesia Station West**  
 Artesia, New Mexico  
 32°43'08.9"N 104°10'52.8"W

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	J. Lujan Puerto		
Date	4/25/25		
Time	8:20 AM		
Wells operating on arrival			
Oxidizer Hour Meter (hours)	19420		
SVE Blower Hour Meter (hours) resets	38.2		
(Manifold) Dilution Air Valve Position (% closed)			<25 LEL ~60% CLOSED
Well Valve Position (%)			100% open now
SVE Vacuum (inches of WC)	86.3		Off Silencer
Ambient Air Temperature (°F)			Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)	598F		
Oxidizer Outlet Temperature (°F)	764F		
<b>Propane</b>			
Tank 1 Propane Level (%)	72%		
Tank 2 Propane Level (%)	72%		
Propane Tank Regulator Pressure (PSI)	15 PSI		10 PSI
Oxidizer Regulator Pressure (PSI)	4 PSI		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)	-20		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>	H2O		
VE-01 WC (inches of Hg)	-10		
VE-02 WC (inches of Hg)	-10		
VE-03 WC (inches of Hg)	-10		
VE-04 WC (inches of Hg)	-10		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	10		
Influent O <sub>2</sub> (%)	19.4		
Influent H <sub>2</sub> S (ppm)	0		
Influent CO (ppm)	0		
Influent CO <sub>2</sub> (ppm)	>10000		
Influent Hydrocarbons (ppmV)	545.5		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	1		
Effluent O <sub>2</sub> (%)	18.0		
Effluent H <sub>2</sub> S (ppm)	0		
Effluent CO (ppm)	0		
Influent O <sub>2</sub> (ppm)	>10000		
Effluent Hydrocarbons (ppmV)	4.8		1% of influent
<b>Notes</b>			



**T 970 SVE System O&M Data Sheet**  
**HF Sinclair Midstream (HEP) Artesia Station West**  
**Artesia, New Mexico**  
**32°43'08.9"N 104°10'52.8"W**

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	Julian Renteria		
Date	4/28/25		
Time	8:00am		
Wells operating on arrival			
Oxidizer Hour Meter (hours)	19425		
SVE Blower Hour Meter (hours) resets	1.4		
(Manifold) Dilution Air Valve Position (% closed)	50%		<25 LEL ~60% CLOSED
Well Valve Position (%)	100%		100% open now
SVE Vacuum (inches of WC)	84.2		Off Silencer
Ambient Air Temperature (°F)	68°		Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)	645		
Oxidizer Outlet Temperature (°F)	680		
<b>Propane</b>			
Tank 1 Propane Level (%)	75%		
Tank 2 Propane Level (%)	75%		
Propane Tank Regulator Pressure (PSI)	10 PSI		10 PSI
Oxidizer Regulator Pressure (PSI)	5 PSI		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)	-20		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>	420		
VE-01 WC (inches of Hg)	-10		
VE-02 WC (inches of Hg)	-10		
VE-03 WC (inches of Hg)	-10		
VE-04 WC (inches of Hg)	-10		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	3		
Influent O <sub>2</sub> (%)	18.5		
Influent H <sub>2</sub> S (ppm)	0		
Influent CO (ppm)	0		
Influent CO <sub>2</sub> (ppm)	>10000		
Influent Hydrocarbons (ppmV)	635		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	4		
Effluent O <sub>2</sub> (%)	16.0 210		
Effluent H <sub>2</sub> S (ppm)	0		
Effluent CO (ppm)	0		
Influent O <sub>2</sub> (ppm)	>10000		
Effluent Hydrocarbons (ppmV)	140.1		1% of influent
<b>Notes</b>			



**T 970 SVE System O&M Data Sheet**  
**HF Sinclair Midstream (HEP) Artesia Station West**  
**Artesia, New Mexico**  
**32°43'08.9"N 104°10'52.8"W**

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	Julian Montes		
Date	4/29/25		
Time	12:00		
Wells operating on arrival			
Oxidizer Hour Meter (hours)	19431		
SVE Blower Hour Meter (hours) resets	26.6		
(Manifold) Dilution Air Valve Position (% closed)	50%		<25 LEL ~60% CLOSED
Well Valve Position (%)	100%		100% open now
SVE Vacuum (inches of WC)	90.3		Off Silencer
Ambient Air Temperature (°F)	75°		Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)	602.4		
Oxidizer Outlet Temperature (°F)	916.8		
<b>Propane</b>			
Tank 1 Propane Level (%)	65%		
Tank 2 Propane Level (%)	65%		
Propane Tank Regulator Pressure (PSI)	10		10 PSI
Oxidizer Regulator Pressure (PSI)	5		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)	-30		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>	490		
VE-01 WC (inches of Hg)	-18		
VE-02 WC (inches of Hg)	-18		
VE-03 WC (inches of Hg)	-18		
VE-04 WC (inches of Hg)	-18		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	19		
Influent O <sub>2</sub> (%)	18.9		
Influent H <sub>2</sub> S (ppm)	0		
Influent CO (ppm)	0		
Influent CO <sub>2</sub> (ppm)	>10000		
Influent Hydrocarbons (ppmV)	640		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	0		
Effluent O <sub>2</sub> (%)	19.1		
Effluent H <sub>2</sub> S (ppm)	0		
Effluent CO (ppm)	0		
Influent O <sub>2</sub> (ppm)	>10000		
Effluent Hydrocarbons (ppmV)	160.2		1% of influent
<b>Notes</b>			

T 970 SVE System O&M Data Sheet  
 HF Sinclair Midstream (HEP) Artesia Station West  
 Artesia, New Mexico  
 32°43'08.9"N 104°10'52.8"W

**TRC**

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	R. N. Nishay, N. Deagan		
Date	5-6-25		
Time	0958		
Wells operating on arrival	1-4		
Oxidizer Hour Meter (hours)	1952		
SVE Blower Hour Meter (hours) resets	114.5		
(Manifold) Dilution Air Valve Position (% closed)	50		<25 LEL ~60% CLOSED
Well Valve Position (%)	100		100% open now
SVE Vacuum (inches of WC)	53.4		Off Silencer
Ambient Air Temperature (°F)	58		Weather Report
Barometric Pressure (inches Hg)	29.79		Weather Report
Oxidizer Inlet Temperature (°F)	585		
Oxidizer Outlet Temperature (°F)	941		
<b>Propane</b>			
Tank 1 Propane Level (%)	75		
Tank 2 Propane Level (%)	75		
Propane Tank Regulator Pressure (PSI)	10		10 PSI
Oxidizer Regulator Pressure (PSI)	5		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)	N/A		Catalytic mode 950 F
Velocity Pressure (inches of WC)	53.4		
Velocity (ft/min)	N/A		
ACFM	N/A		
SCFM	N/A		
<b>A: Wells</b>			
VE-01 WC (inches of Hg)	38		
VE-02 WC (inches of Hg)	38		
VE-03 WC (inches of Hg)	38		
VE-04 WC (inches of Hg)	38		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	1		
Influent O <sub>2</sub> (%)	18.5		
Influent H <sub>2</sub> S (ppm)	0.0		
Influent CO (ppm)	11		
Influent CO <sub>2</sub> (ppm)	over		
Influent Hydrocarbons (ppmV)	1253		
<b>Exhaust Concentrations Post-Cat</b>			100x effluent
Effluent CH <sub>4</sub> (% LEL)	12		
Effluent O <sub>2</sub> (%)	17.1		
Effluent H <sub>2</sub> S (ppm)	0.5		
Effluent CO (ppm)	over		
Influent O <sub>2</sub> (ppm)	over		
Effluent Hydrocarbons (ppmV)	968		1% of influent
<b>Notes</b>			



T 970 SVE System O&M Data Sheet  
 HF Sinclair Midstream (HEP) Artesia Station West  
 Artesia, New Mexico  
 32°43'08.9"N 104°10'52.8"W

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	J. Lopez		
Date	5/2/25		
Time	3:00 PM		
Wells operating on arrival			
Oxidizer Hour Meter (hours)	19528		
SVE Blower Hour Meter (hours) resets	131.5		
(Manifold) Dilution Air Valve Position (% closed)	7%		<25 LEL ~60% CLOSED
Well Valve Position (%)	100%		100% open now
SVE Vacuum (inches of WC)	30.0		Off Silencer
Ambient Air Temperature (°F)	73°		Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)	593		
Oxidizer Outlet Temperature (°F)	728		
<b>Propane</b>			
Tank 1 Propane Level (%)	70%		
Tank 2 Propane Level (%)	10%		
Propane Tank Regulator Pressure (PSI)	10		10 PSI
Oxidizer Regulator Pressure (PSI)	5		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)	-40		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
VE-01 WC (inches of Hg)	-19		
VE-02 WC (inches of Hg)	-19		
VE-03 WC (inches of Hg)	-19		
VE-04 WC (inches of Hg)	-19		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	6%		
Influent O <sub>2</sub> (%)	20.5		
Influent H <sub>2</sub> S (ppm)	0.0		
Influent CO (ppm)	2		
Influent CO <sub>2</sub> (ppm)	7/10000		
Influent Hydrocarbons (ppmV)	560.4		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	4		
Effluent O <sub>2</sub> (%)	18.5		
Effluent H <sub>2</sub> S (ppm)	0.0		
Effluent CO (ppm)	115		
Influent O <sub>2</sub> (ppm)	7/10000		
Effluent Hydrocarbons (ppmV)	299.5		1% of influent
<b>Notes</b>			

Artesia, New Mexico  
32°43'08.9"N 104°10'52.8"W

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	Julian Puente	Julian	
Date	5/9/25	5/9/25	
Time	7:00AM	9:00AM	
Wells operating on arrival			
Oxidizer Hour Meter (hours)	19576	19578	
SVE Blower Hour Meter (hours) resets	168.3	170.5	
(Manifold) Dilution Air Valve Position (% closed)	4%	4%	<25 LEL ~60% CLOSED
Well Valve Position (%)	100%	100%	100% open now
SVE Vacuum (inches of WC)	55.2	51.8	Off Silencer
Ambient Air Temperature (°F)	54°	56°	Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)	563	595.4	
Oxidizer Outlet Temperature (°F)	948	946.8	
<b>Propane</b>			
Tank 1 Propane Level (%)	60%	60%	
Tank 2 Propane Level (%)	60%	60%	
Propane Tank Regulator Pressure (PSI)	10 PSI	10 PSI	10 PSI
Oxidizer Regulator Pressure (PSI)	5 PSI	5 PSI	5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)	-90	-60	
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
H <sub>2</sub> O			
VE-01 WC (inches of Hg)	-40	-39	
VE-02 WC (inches of Hg)	-40	-39	
VE-03 WC (inches of Hg)	-40	-39	
VE-04 WC (inches of Hg)	-40	-39	
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	14	13	
Influent O <sub>2</sub> (%)	18.3	18.7	
Influent H <sub>2</sub> S (ppm)	0.0	0.0	
Influent CO (ppm)	6	7	
Influent CO <sub>2</sub> (ppm)	710000	710000	
Influent Hydrocarbons (ppmV)	1335	1245	100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	10	10	
Effluent O <sub>2</sub> (%)	17.5	17.8	
Effluent H <sub>2</sub> S (ppm)	0.0	0.0	
Effluent CO (ppm)	710000	425	
Influent O <sub>2</sub> (ppm)	710000	710000	
Effluent Hydrocarbons (ppmV)	973	807	1% of influent
<b>Notes</b>			

T 970 SVE Data Sheet  
 Downstream (HEP) Artesia  
 Artesia, New Mexico  
 32°43'08.9"N 104°10'52.8"W

Parameter	Technician(s)	Engine Start	Engine Stop	Ideal Range
		5-12-23		
		12:30		
		1-4		
		19584		
				<25 LEL
				~60% CLOSED
(Manifold) Dilution Air Valve Position (% closed)		40%		100% open now
Well Valve Position (%)		100%		Off Silencer
SVE Vacuum (inches of WC)		47.2		Weather Report
Ambient Air Temperature (°F)				Weather Report
Barometric Pressure (inches Hg)				
Oxidizer Inlet Temperature (°F)		638		
Oxidizer Outlet Temperature (°F)		958		
Propane				
Tank 1 Propane Level (%)		60		
Tank 2 Propane Level (%)		60		
Propane Tank Regulator Pressure (PSI)		10		10 PSI
Oxidizer Regulator Pressure (PSI)		5		5 PSI
Data Logger				
Combustion Chamber Temperature (°F)				Catalytic mode
Velocity Pressure (inches of WC)				950 F
Velocity (ft/min)				
ACFM				
SCFM				
At Wells				
VE-01 WC (inches of Hg)		-35		
VE-02 WC (inches of Hg)		-33		
VE-03 WC (inches of Hg)		-35		
VE-04 WC (inches of Hg)		-30		
Combined Inlet Wellhead Data				
Influent CH <sub>4</sub> (% LEL)		13		
Influent O <sub>2</sub> (%)		18.4		
Influent H <sub>2</sub> S (ppm)		0		
Influent CO (ppm)		4		
Influent CO <sub>2</sub> (ppm)		10000+		
Influent Hydrocarbons (ppmV)		995		
Exhaust Concentrations Post-Cat				100x effluent
Effluent CH <sub>4</sub> (% LEL)		9		
Effluent O <sub>2</sub> (%)		12.4		
Effluent H <sub>2</sub> S (ppm)		0		
Effluent CO (ppm)		495		
Effluent CO <sub>2</sub> (ppm)		10000+		
Effluent Hydrocarbons (ppmV)		823		
Notes				1% of influent



T 970 SVE System O&M Data Sheet  
 HF Sinclair Midstream (HEP) Artesia Station West  
 Artesia, New Mexico  
 32°43'08.9"N 104°10'52.8"W

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	RNIEHAY		
Date	8/14/25		
Time	0820		
Wells operating on arrival	1-4		
Oxidizer Hour Meter (hours)	19683		
SVE Blower Hour Meter (hours) resets	27.0		
(Manifold) Dilution Air Valve Position (% closed)	20		<25 LEL ~60% CLOSED
Well Valve Position (%)	100		100% open now
SVE Vacuum (inches of WC)	-30.2		Off Silencer
Ambient Air Temperature (°F)	72.0		Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)	529.2		
Oxidizer Outlet Temperature (°F)	864.4		
<b>Propane</b>			
Tank 1 Propane Level (%)	72		
Tank 2 Propane Level (%)	72		
Propane Tank Regulator Pressure (PSI)	22		10 PSI
Oxidizer Regulator Pressure (PSI)	7		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)	/		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
VE-01 WC (inches of Hg)	-15		
VE-02 WC (inches of Hg)	1		
VE-03 WC (inches of Hg)	1		
VE-04 WC (inches of Hg)	1		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	6		
Influent O <sub>2</sub> (%)	18.9		
Influent H <sub>2</sub> S (ppm)	0		
Influent CO (ppm)	0		
Influent CO <sub>2</sub> (ppm)	210000		
Influent Hydrocarbons (ppmV)	608		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	0		
Effluent O <sub>2</sub> (%)	15.9		
Effluent H <sub>2</sub> S (ppm)	0		
Effluent CO (ppm)	0		
<sup>CO2</sup> Influent O <sub>2</sub> (ppm)	710000		
Effluent Hydrocarbons (ppmV)	0.3		1% of influent
<b>Notes</b>			



T 970 SVE System O&M Data Sheet  
 HF Sinclair Midstream (HEP) Artesia Station West  
 Artesia, New Mexico  
 32°43'08.9"N 104°10'52.8"W

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	R. Pierson		
Date	10/23/25		
Time	6:11:08		
Wells operating on arrival	1-4		
Oxidizer Hour Meter (hours)	19232		
SVE Blower Hour Meter (hours) resets	195.1		
(Manifold) Dilution Air Valve Position (% closed)	70%		<25 LEL ~60% CLOSED
Well Valve Position (%)	30% open		100% open now
SVE Vacuum (inches of WC)	30.0		Off Silencer
Ambient Air Temperature (°F)	57 F		Weather Report
Barometric Pressure (inches Hg)	30.08		Weather Report
Oxidizer Inlet Temperature (°F)	600		
Oxidizer Outlet Temperature (°F)	900		
<b>Propane</b>			
Tank 1 Propane Level (%)	67%		
Tank 2 Propane Level (%)	65%		
Propane Tank Regulator Pressure (PSI)	34		10 PSI
Oxidizer Regulator Pressure (PSI)	5.5		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)	900		Catalytic mode 950 F
Velocity Pressure (inches of WC)	50.0/2.3		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
VE-01 WC (inches of Hg)	30		
VE-02 WC (inches of Hg)	30		
VE-03 WC (inches of Hg)	30		
VE-04 WC (inches of Hg)	30		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	9		
Influent O <sub>2</sub> (%)	17.8		
Influent H <sub>2</sub> S (ppm)	0		
Influent CO (ppm)	0		
Influent CO <sub>2</sub> (ppm)	21000		
Influent Hydrocarbons (ppmV)	1097		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	0		
Effluent O <sub>2</sub> (%)	15.7		
Effluent H <sub>2</sub> S (ppm)	0		
Effluent CO (ppm)	3		
CO <sub>2</sub> Influent CO <sub>2</sub> (ppm)	21000		
Effluent Hydrocarbons (ppmV)	2.6		1% of influent
<b>Notes</b>			

Artesia, New Mexico  
32°43'08.9"N 104°10'52.8"W

KO empty

water in valve

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	R. B. Soley	R. B. Soley	
Date	10/30/25	10/30/25	
Time	11:30	09:00	
Wells operating on arrival	1-4	1-4	
Oxidizer Hour Meter (hours)	19903	19702	
SVE Blower Hour Meter (hours) resets	362	361	
(Manifold) Dilution Air Valve Position (% closed)	70%	70%	<25 LEL ~60% CLOSED
Well Valve Position (%)	20%	30%	100% open now
SVE Vacuum (inches of WC)	51.9	50.3	OFF Silencer
Ambient Air Temperature (°F)		44	Weather Report
Barometric Pressure (inches Hg)		30.3	Weather Report
Oxidizer Inlet Temperature (°F)	600	600	
Oxidizer Outlet Temperature (°F)	881	700	
<b>Propane</b>			
Tank 1 Propane Level (%)	72	72	
Tank 2 Propane Level (%)	72	20 72	
Propane Tank Regulator Pressure (PSI)	76	24 34	10 PSI
Oxidizer Regulator Pressure (PSI)	6	5.5	5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)	881	905	Catalytic mode 950 F
Velocity Pressure (inches of WC)	2.2	1.2	
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
VE-01 WC (inches of Hg)	35	35	
VE-02 WC (inches of Hg)	29	32	
VE-03 WC (inches of Hg)	29	31	
VE-04 WC (inches of Hg)	30	38	
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (%LEL)	0	0	
Influent O <sub>2</sub> (%)	18.8	19.9	
Influent H <sub>2</sub> S (ppm)	0	0	
Influent CO (ppm)	3	0	
Influent CO <sub>2</sub> (ppm)	70000	710000	
Influent Hydrocarbons (ppmV)	1161	1377	100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (%LEL)	0	0	
Effluent O <sub>2</sub> (%)	15.9	16.2	
Effluent H <sub>2</sub> S (ppm)	0	0	
Effluent CO (ppm)	1	2	
Influent CO <sub>2</sub> (ppm)	710000	710000	
Effluent Hydrocarbons (ppmV)	2.1	10.1	1% of influent
<b>Notes</b>			



T 970 SVE System O&M Data Sheet  
 HF Sinclair Midstream (HEP) Artesia Station West  
 Artesia, New Mexico  
 32°43'08.9"N 104°10'52.8"W

Parameter	Engine Start	Engine Stop	Ideal Range
Technician(s)	Julian Parks		
Date	4/18/25		
Time	9:00 AM		
Wells operating on arrival			
Oxidizer Hour Meter (hours)	20211		
SVE Blower Hour Meter (hours) resets	667.1		
(Manifold) Dilution Air Valve Position (% closed)	3%		<25 LEL ~60% CLOSED
Well Valve Position (%)	3%		100% open now
SVE Vacuum (inches of WC)	50.1		Off Silencer
Ambient Air Temperature (°F)	40°		Weather Report
Barometric Pressure (inches Hg)			Weather Report
Oxidizer Inlet Temperature (°F)	597		
Oxidizer Outlet Temperature (°F)	900		
<b>Propane</b>			
Tank 1 Propane Level (%)	85%		
Tank 2 Propane Level (%)	89%		
Propane Tank Regulator Pressure (PSI)	32 PSI		10 PSI
Oxidizer Regulator Pressure (PSI)	5 PSI		5 PSI
<b>Data Logger</b>			
Combustion Chamber Temperature (°F)			Catalytic mode 950 F
Velocity Pressure (inches of WC)	-60		
Velocity (ft/min)			
ACFM			
SCFM			
<b>At Wells</b>			
VE-01 WC (inches of Hg)	-30		
VE-02 WC (inches of Hg)	-30		
VE-03 WC (inches of Hg)	-30		
VE-04 WC (inches of Hg)	-30		
<b>Combined Inlet Wellhead Data</b>			
Influent CH <sub>4</sub> (% LEL)	8		
Influent O <sub>2</sub> (%)	19.0		
Influent H <sub>2</sub> S (ppm)	0.0		
Influent CO (ppm)	1		
Influent CO <sub>2</sub> (ppm)	>10 000		
Influent Hydrocarbons (ppmV)	1200		100x effluent
<b>Exhaust Concentrations Post-Cat</b>			
Effluent CH <sub>4</sub> (% LEL)	0		
Effluent O <sub>2</sub> (%)	16.8		
Effluent H <sub>2</sub> S (ppm)	0.0		
Effluent CO (ppm)	0		
Influent O <sub>2</sub> (ppm)	>10 000		
Effluent Hydrocarbons (ppmV)	40		1% of influent
<b>Notes</b>			



**T970 SVE System O&M Data Sheet**  
**HF Sinclair Midstream (HEP) Artesia Station West**  
 481 Depco Rd, Artesia, New Mexico 88210  
 32°43'08.9"N 104°10'52.8"W  
 Lock Combo - 0970

Rev 3  
 Updated 10/28/2025

Parameter		Ideal Range
Technician(s)	Robert Nishan	
Date	11-24-25	
Time	1030	
Wells operating on arrival (VE1 - VE4)	1-V	
Oxidizer Hour Meter (hours)	20514	
SVE Blower Hour Meter (hours) resets	963.6	
(Manifold) Dilution Air Valve Position (% closed)	70%	<25 LEL -60% CLOSED
Well Valve Position (%)	30%	100% open now
SVE Vacuum (inches of WC)	60	Off Silencer
Ambient Air Temperature (°F)	61	Weather Report
Barometric Pressure (inches Hg)	30.04	Weather Report
Knock-Out Tank Level (% Sight Tube)	0	
Condensate Produced (gallons)	0	
Oxidizer Inlet Temperature (°F)	602	
Oxidizer Outlet Temperature (°F)	865	
<b>Propane</b>		
Tank 1 Propane Level (%)	65	Recorded in MyTank App
Tank 2 Propane Level (%)	63	
Propane Tank Regulator Pressure (PSI)	32	32 10PSI
Oxidizer Regulator Pressure (PSI)	with 6	6 5 PSI
<b>Data Logger</b>		
Combustion Chamber Temperature (°F)	cat temp 865	Cat mode 950 F
Velocity Pressure (inches of WC)	exhaust flow 0.7	
<b>At Wells</b>		
VE-01 WC (inches of Hg)	H <sub>2</sub> O 38	
VE-02 WC (inches of Hg)	33	
VE-03 WC (inches of Hg)	32	
VE-04 WC (inches of Hg)	38	

Rev 3  
Updated 10/28/2025

T970 SVE System O&M Data Sheet  
HF Sinclair Midstream (HEP) Artesia Station West  
481 Depco Rd, Artesia, New Mexico 88210  
32°43'08.9"N 104°10'52.8"W  
Lock Combo - 0970

11-24-21

Parameter		Ideal Range
<b>Combined Inlet Wellhead Data</b>		
Influent CH <sub>4</sub> (% LEL)	7	
Influent O <sub>2</sub> (%)	20.6	
Influent H <sub>2</sub> S (ppm)	0	
Influent CO (ppm)	3	
Influent CO <sub>2</sub> (ppm)	>10000	
Influent VOCs (ppm)	1543	1/100 <sup>th</sup>
Influent Hydrocarbons (ppmW)		100x effluent
<b>Exhaust Concentrations Post-Cat</b>		
Effluent CH <sub>4</sub> (% LEL)	0	
Effluent O <sub>2</sub> (%)	17.6	
Effluent H <sub>2</sub> S (ppm)	0.0	
Effluent CO (ppm)	1	
<sup>CO<sub>2</sub></sup> Effluent O <sub>2</sub> (ppm)	>10000	
Effluent VOCs (ppm)	2.5	1/2 inf
Effluent Hydrocarbons (ppmV)	2.5	1% of influent
<b>Notes</b>		

## **Appendix D: Laboratory Analytical Reports**



**Analytical Report**

5/7/2025  
Mr. Robert A. Niehay II  
TRC Companies, Inc.  
505 E. Huntland Dr.  
Suite 250  
Austin TX 78752

Project Name: T970 SVE O&M  
Project #: 639242 Ph5  
Workorder #: 2504610A

Dear Mr. Robert A. Niehay II

The following report includes the data for the above referenced project for sample(s) received on 4/24/2025 at Eurofins Air Toxics LLC.

The data and associated QC analyzed by Modified TO-15 (5&20 ppbv) are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Eurofins Air Toxics LLC. for your air analysis needs. Eurofins Air Toxics Inc. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Brian Whittaker at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

A handwritten signature in black ink that reads "Brian Whittaker". The signature is written in a cursive, flowing style.

Brian Whittaker  
Project Manager



Air Toxics

**WORK ORDER #: 2504610A**

Work Order Summary

<b>CLIENT:</b>	Mr. Robert A. Niehay II TRC Companies, Inc. 505 E. Huntland Dr. Suite 250 Austin, TX 78752	<b>BILL TO:</b>	Accounts Payable/Windsor TRC Companies, Inc. 21 Griffin Rd North Windsor, CT 06095
<b>PHONE:</b>	915-222-1322	<b>P.O. #</b>	639242 Ph5
<b>FAX:</b>	432-201-5238	<b>PROJECT #</b>	639242 Ph5 T970 SVE O&M
<b>DATE RECEIVED:</b>	04/24/2025	<b>CONTACT:</b>	Brian Whittaker
<b>DATE COMPLETED:</b>	05/07/2025		

<u>FRACTION #</u>	<u>NAME</u>	<u>TEST</u>	<u>RECEIPT VAC./PRES.</u>	<u>FINAL PRESSURE</u>
01A	Influent-04-23-25	Modified TO-15 (5&20 ppbv	Tedlar Bag	Tedlar Bag
02A	Effluent-04-23-25	Modified TO-15 (5&20 ppbv	Tedlar Bag	Tedlar Bag
03A	Lab Blank	Modified TO-15 (5&20 ppbv	NA	NA
04A	CCV	Modified TO-15 (5&20 ppbv	NA	NA
05A	LCS	Modified TO-15 (5&20 ppbv	NA	NA
05AA	LCSD	Modified TO-15 (5&20 ppbv	NA	NA

CERTIFIED BY:   
 Technical Director

DATE: 05/07/25

Cert. No.: AZ Licensure-AZ0775, FL NELAP-E87680, LA NELAP-02089, MN NELAP-2836569, NH NELAP-209224-A, NJ NELAP-CA016, NY NELAP-11291, TX NELAP-T104704434, UT NELAP-CA009332023-16, VA NELAP-13180, WA NELAP-C935  
 Name of Accreditation Body: NELAP/ORELAP (Oregon Environmental Laboratory Accreditation Program) CA300005-21  
 Eurofins Environment Testing Northern California, LLC certifies that the test results contained in this report meet all requirements of the 2016 TNI Standard.

*This report shall not be reproduced, except in full, without the written approval of Eurofins Air Toxics, LLC.*  
 180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630  
 (916) 985-1000



**LABORATORY NARRATIVE**  
**EPA Method TO-15 Soil Gas**  
**TRC Companies, Inc.**  
**Workorder# 2504610A**

Two 1 Liter Tedlar Bag samples were received on April 24, 2025. The laboratory performed analysis via EPA Method TO-15 using GC/MS in the full scan mode. The method involves concentrating up to 50 mLs of air. The concentrated aliquot is then flash vaporized and swept through a water management system to remove water vapor. Following dehumidification, the sample passes directly into the GC/MS for analysis.

**Receiving Notes**

There were no receiving discrepancies.

**Analytical Notes**

Method TO-15 is validated for samples collected in specially treated canisters. As such, the use of Tedlar bags for sample collection is outside the scope of the method and not recommended for ambient or indoor air samples. It is the responsibility of the data user to determine the usability of TO-15 results generated from Tedlar bags.

Dilution was performed on sample Influent-04-23-25 due to the presence of high level target species.

The recovery of surrogate Toluene-d8 in sample Influent-04-23-25 was outside laboratory control limits due to high level matrix interference. The surrogate recovery is flagged.

**Definition of Data Qualifying Flags**

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

J - Estimated value.

E - Exceeds instrument calibration range.

S - Saturated peak.

Q - Exceeds quality control limits.

U - Compound analyzed for but not detected above the reporting limit, LOD, or MDL value. See data page for project specific U-flag definition.

UJ- Non-detected compound associated with low bias in the CCV

N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:

a-File was requantified

b-File was quantified by a second column and detector

r1-File was requantified for the purpose of reissue



**Summary of Detected Compounds  
EPA METHOD TO-15 GC/MS**

**Client Sample ID: Influent-04-23-25**

**Lab ID#: 2504610A-01A**

<b>Compound</b>	<b>Rpt. Limit (ppbv)</b>	<b>Amount (ppbv)</b>	<b>Rpt. Limit (ug/m3)</b>	<b>Amount (ug/m3)</b>
Benzene	62	44000	200	140000
Toluene	62	4500	240	17000
Ethyl Benzene	62	9600	270	42000
m,p-Xylene	62	10000	270	45000
o-Xylene	62	1800	270	8000

**Client Sample ID: Effluent-04-23-25**

**Lab ID#: 2504610A-02A**

No Detections Were Found.



Air Toxics

Client Sample ID: Influent-04-23-25

Lab ID#: 2504610A-01A

EPA METHOD TO-15 GC/MS

File Name:	14042532	Date of Collection:	4/23/25 12:34:00 PM
Dil. Factor:	12.5	Date of Analysis:	4/25/25 09:21 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Benzene	62	44000	200	140000
Toluene	62	4500	240	17000
Ethyl Benzene	62	9600	270	42000
m,p-Xylene	62	10000	270	45000
o-Xylene	62	1800	270	8000

Q = Exceeds Quality Control limits.

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	101	70-130
Toluene-d8	166 Q	70-130
4-Bromofluorobenzene	98	70-130



Air Toxics

Client Sample ID: Effluent-04-23-25

Lab ID#: 2504610A-02A

EPA METHOD TO-15 GC/MS

File Name:	14042524	Date of Collection:	4/23/25 12:34:00 PM
Dil. Factor:	1.00	Date of Analysis:	4/25/25 05:45 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Benzene	5.0	Not Detected	16	Not Detected
Toluene	5.0	Not Detected	19	Not Detected
Ethyl Benzene	5.0	Not Detected	22	Not Detected
m,p-Xylene	5.0	Not Detected	22	Not Detected
o-Xylene	5.0	Not Detected	22	Not Detected

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	101	70-130
Toluene-d8	94	70-130
4-Bromofluorobenzene	104	70-130



Air Toxics

Client Sample ID: Lab Blank

Lab ID#: 2504610A-03A

EPA METHOD TO-15 GC/MS

File Name:	14042505d	Date of Collection:	NA
Dil. Factor:	1.00	Date of Analysis:	4/25/25 09:31 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Benzene	5.0	Not Detected	16	Not Detected
Toluene	5.0	Not Detected	19	Not Detected
Ethyl Benzene	5.0	Not Detected	22	Not Detected
m,p-Xylene	5.0	Not Detected	22	Not Detected
o-Xylene	5.0	Not Detected	22	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	103	70-130
Toluene-d8	95	70-130
4-Bromofluorobenzene	98	70-130



Air Toxics

Client Sample ID: CCV

Lab ID#: 2504610A-04A

EPA METHOD TO-15 GC/MS

File Name:	14042502	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 4/25/25 08:12 AM

Compound	%Recovery
Benzene	91
Toluene	90
Ethyl Benzene	90
m,p-Xylene	91
o-Xylene	88

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	99	70-130
Toluene-d8	97	70-130
4-Bromofluorobenzene	100	70-130



Air Toxics

Client Sample ID: LCS

Lab ID#: 2504610A-05A

EPA METHOD TO-15 GC/MS

File Name:	14042503	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 4/25/25 08:36 AM

Compound	%Recovery	Method Limits
Benzene	92	70-130
Toluene	88	70-130
Ethyl Benzene	92	70-130
m,p-Xylene	91	70-130
o-Xylene	88	70-130

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	100	70-130
Toluene-d8	96	70-130
4-Bromofluorobenzene	102	70-130



Air Toxics

Client Sample ID: LCSD  
 Lab ID#: 2504610A-05AA  
 EPA METHOD TO-15 GC/MS

File Name:	14042504	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 4/25/25 09:02 AM

Compound	%Recovery	Method Limits
Benzene	92	70-130
Toluene	89	70-130
Ethyl Benzene	89	70-130
m,p-Xylene	90	70-130
o-Xylene	89	70-130

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	99	70-130
Toluene-d8	97	70-130
4-Bromofluorobenzene	101	70-130

**Method : TO-15 (5&20 ppbv) (Sh)-BTEX only**

<b>CAS Number</b>	<b>Compound</b>	<b>Rpt. Limit (ppbv)</b>
71-43-2	Benzene	5.0
108-88-3	Toluene	5.0
100-41-4	Ethyl Benzene	5.0
108-38-3	m,p-Xylene	5.0
95-47-6	o-Xylene	5.0

	<b>Surrogate</b>	<b>Method Limits</b>
17060-07-0	1,2-Dichloroethane-d4	70-130
2037-26-5	Toluene-d8	70-130
460-00-4	4-Bromofluorobenzene	70-130



**Analytical Report**

5/7/2025  
Mr. Robert A. Niehay II  
TRC Companies, Inc.  
505 E. Huntland Dr.  
Suite 250  
Austin TX 78752

Project Name: T970 SVE O&M  
Project #: 639242 Ph5  
Workorder #: 2504610B

Dear Mr. Robert A. Niehay II

The following report includes the data for the above referenced project for sample(s) received on 4/24/2025 at Eurofins Air Toxics LLC.

The data and associated QC analyzed by Modified TO-3 are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Eurofins Air Toxics LLC. for your air analysis needs. Eurofins Air Toxics Inc. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Brian Whittaker at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

A handwritten signature in black ink that reads "Brian Whittaker". The signature is written in a cursive, flowing style.

Brian Whittaker  
Project Manager



Air Toxics

**WORK ORDER #: 2504610B**

Work Order Summary

<b>CLIENT:</b>	Mr. Robert A. Niehay II TRC Companies, Inc. 505 E. Huntland Dr. Suite 250 Austin, TX 78752	<b>BILL TO:</b>	Accounts Payable/Windsor TRC Companies, Inc. 21 Griffin Rd North Windsor, CT 06095
<b>PHONE:</b>	915-222-1322	<b>P.O. #</b>	639242 Ph5
<b>FAX:</b>	432-201-5238	<b>PROJECT #</b>	639242 Ph5 T970 SVE O&M
<b>DATE RECEIVED:</b>	04/24/2025	<b>CONTACT:</b>	Brian Whittaker
<b>DATE COMPLETED:</b>	05/07/2025		

<u>FRACTION #</u>	<u>NAME</u>	<u>TEST</u>	<u>RECEIPT VAC./PRES.</u>	<u>FINAL PRESSURE</u>
01A	Influent-04-23-25	Modified TO-3	Tedlar Bag	Tedlar Bag
02A	Effluent-04-23-25	Modified TO-3	Tedlar Bag	Tedlar Bag
03A	Lab Blank	Modified TO-3	NA	NA
04A	CCV	Modified TO-3	NA	NA
05A	LCS	Modified TO-3	NA	NA
05AA	LCSD	Modified TO-3	NA	NA

CERTIFIED BY:   
 Technical Director

DATE: 05/07/25

Cert. No.: AZ Licensure-AZ0775, FL NELAP-E87680, LA NELAP-02089, MN NELAP-2836569, NH NELAP-209224-A, NJ NELAP-CA016, NY NELAP-11291, TX NELAP-T104704434, UT NELAP-CA009332023-16, VA NELAP-13180, WA NELAP-C935  
 Name of Accreditation Body: NELAP/ORELAP (Oregon Environmental Laboratory Accreditation Program) CA300005-21  
 Eurofins Environment Testing Northern California, LLC certifies that the test results contained in this report meet all requirements of the 2016 TNI Standard.

*This report shall not be reproduced, except in full, without the written approval of Eurofins Air Toxics, LLC.*  
 180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630  
 (916) 985-1000



**LABORATORY NARRATIVE**  
**Modified TO-3**  
**TRC Companies, Inc.**  
**Workorder# 2504610B**

Two 1 Liter Tedlar Bag samples were received on April 24, 2025. The laboratory performed analysis for volatile organic compounds in air via modified EPA Method TO-3 using gas chromatography with flame ionization detection. The TPH results are calculated using the response of Gasoline. A molecular weight of 100 is used to convert the TPH ppmv result to ug/L. The method involves concentrating up to 200 mL of sample. The concentrated aliquot is then dry purged to remove water vapor prior to entering the chromatographic system.

Method modifications taken to run these samples are summarized in the table below. Specific project requirements may over-ride the ATL modifications.

<i>Requirement</i>	<i>TO-3</i>	<i>ATL Modifications</i>
Daily Calibration Standard Frequency	Prior to sample analysis and every 4 - 6 hrs	Prior to sample analysis and after the analytical batch $\leq$ 20 samples.
Initial Calibration Calculation	4-point calibration using a linear regression model	5-point calibration using average Response Factor
Initial Calibration Frequency	Weekly	When daily calibration standard recovery is outside 75 - 125 %, or upon significant changes to procedure or instrumentation
Moisture Control	Nafion system	Sorbent system
Minimum Detection Limit (MDL)	Calculated using the equation $DL = A + 3.3S$ , where A is intercept of calibration line and S is the standard deviation of at least 3 reps of low level standard	40 CFR Pt. 136 App. B
Preparation of Standards	Levels achieved through dilution of gas mixture	Levels achieved through loading various volumes of the gas mixture

**Receiving Notes**

There were no receiving discrepancies.

**Analytical Notes**

There were no analytical discrepancies.

**Definition of Data Qualifying Flags**

Seven qualifiers may have been used on the data analysis sheets and indicate as follows:

B - Compound present in laboratory blank greater than reporting limit.

J - Estimated value.

E - Exceeds instrument calibration range.

S - Saturated peak.



Air Toxics

- 
- Q - Exceeds quality control limits.
  - U - Compound analyzed for but not detected above the detection limit.
  - M - Reported value may be biased due to apparent matrix interferences.

File extensions may have been used on the data analysis sheets and indicates as follows:

- a-File was requantified
- b-File was quantified by a second column and detector
- r1-File was requantified for the purpose of reissue



Air Toxics

### Summary of Detected Compounds MODIFIED EPA METHOD TO-3 GC/FID

Client Sample ID: Influent-04-23-25

Lab ID#: 2504610B-01A

Compound	Rpt. Limit (ppmv)	Rpt. Limit (ug/L)	Amount (ppmv)	Amount (ug/L)
TPH (Gasoline Range)	5.0	20	2800	11000

Client Sample ID: Effluent-04-23-25

Lab ID#: 2504610B-02A

Compound	Rpt. Limit (ppmv)	Rpt. Limit (ug/L)	Amount (ppmv)	Amount (ug/L)
TPH (Gasoline Range)	0.025	0.10	0.49	2.0



Air Toxics

Client Sample ID: Influent-04-23-25

Lab ID#: 2504610B-01A

MODIFIED EPA METHOD TO-3 GC/FID

File Name:	d042613	Date of Collection:	4/23/25 12:34:00 PM
Dil. Factor:	200	Date of Analysis:	4/26/25 10:18 AM

Compound	Rpt. Limit (ppmv)	Rpt. Limit (ug/L)	Amount (ppmv)	Amount (ug/L)
TPH (Gasoline Range)	5.0	20	2800	11000

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
Fluorobenzene (FID)	117	75-150



Air Toxics

Client Sample ID: Effluent-04-23-25

Lab ID#: 2504610B-02A

**MODIFIED EPA METHOD TO-3 GC/FID**

<b>File Name:</b>	d042611	<b>Date of Collection:</b> 4/23/25 12:34:00 PM
<b>Dil. Factor:</b>	1.00	<b>Date of Analysis:</b> 4/26/25 09:04 AM

Compound	Rpt. Limit (ppmv)	Rpt. Limit (ug/L)	Amount (ppmv)	Amount (ug/L)
TPH (Gasoline Range)	0.025	0.10	0.49	2.0

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
Fluorobenzene (FID)	106	75-150



Air Toxics

Client Sample ID: Lab Blank

Lab ID#: 2504610B-03A

**MODIFIED EPA METHOD TO-3 GC/FID**

<b>File Name:</b>	<b>d042603</b>	<b>Date of Collection:</b> NA
<b>Dil. Factor:</b>	<b>1.00</b>	<b>Date of Analysis:</b> 4/25/25 04:43 PM

<b>Compound</b>	<b>Rpt. Limit (ppmv)</b>	<b>Rpt. Limit (ug/L)</b>	<b>Amount (ppmv)</b>	<b>Amount (ug/L)</b>
TPH (Gasoline Range)	0.025	0.10	Not Detected	Not Detected

Container Type: NA - Not Applicable

<b>Surrogates</b>	<b>%Recovery</b>	<b>Method Limits</b>
Fluorobenzene (FID)	95	75-150



Air Toxics

Client Sample ID: CCV

Lab ID#: 2504610B-04A

MODIFIED EPA METHOD TO-3 GC/FID

File Name:	d042601	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 4/25/25 03:26 PM

Compound	%Recovery
TPH (Gasoline Range)	90

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Fluorobenzene (FID)	119	75-150



Air Toxics

Client Sample ID: LCS

Lab ID#: 2504610B-05A

**MODIFIED EPA METHOD TO-3 GC/FID**

<b>File Name:</b>	<b>d042602</b>	<b>Date of Collection: NA</b>
<b>Dil. Factor:</b>	<b>1.00</b>	<b>Date of Analysis: 4/25/25 04:06 PM</b>

<b>Compound</b>	<b>%Recovery</b>	<b>Method Limits</b>
TPH (Gasoline Range)	85	75-125

Container Type: NA - Not Applicable

<b>Surrogates</b>	<b>%Recovery</b>	<b>Method Limits</b>
Fluorobenzene (FID)	117	75-150



Air Toxics

Client Sample ID: LCSD

Lab ID#: 2504610B-05AA

**MODIFIED EPA METHOD TO-3 GC/FID**

<b>File Name:</b>	<b>d042615</b>	<b>Date of Collection: NA</b>
<b>Dil. Factor:</b>	<b>1.00</b>	<b>Date of Analysis: 4/26/25 11:53 AM</b>

<b>Compound</b>	<b>%Recovery</b>	<b>Method Limits</b>
TPH (Gasoline Range)	84	75-125

Container Type: NA - Not Applicable

<b>Surrogates</b>	<b>%Recovery</b>	<b>Method Limits</b>
Fluorobenzene (FID)	121	75-150



**Method : Modified TO-3 (Sh)-TPHg only**

<b>CAS Number</b>	<b>Compound</b>	<b>Rpt. Limit (ppmv)</b>
9999-9999-208	TPH (Gasoline Range)	0.025

	<b>Surrogate</b>	<b>Method Limits</b>
462-06-602	Fluorobenzene (FID)	75-150



## Analytical Data Review Checklist

<b>Site:</b> Tank 970 - Artesia Station West <b>Location:</b> Eddy County, New Mexico <b>Client Name:</b> HEP <b>Project #:</b> 705860		<b>Laboratory:</b> Eurofins Air Toxics - Folsom, CA <b>Lab Report #s:</b> 2504610A and 2504610B <b>Reviewer:</b> Nancy Bergstrom <b>Peer Reviewer:</b> Jessica Esser <b>Review Date:</b> 2/6/2026	
<b>Analytical Method(s):</b> -Total Benzene, Toluene, Ethylbenzene, Xylenes (BTEX) with Benzene, Toluene, Ethylbenzene, m,p-Xylenes and o-Xylene by EPA Method TO-15 -Total Petroleum Hydrocarbons (TPH) Gasoline Range by EPA Method TO-3		<b>Matrices Sampled:</b> Soil Vapor Samples	<b>Sample Collection Date(s):</b> 4/23/2025
<b>Sampling Objective(s):</b> Estimate hydrocarbon recovery rates and cumulative hydrocarbon recovery.			
<b>Sample IDs (List IDs or attach COC):</b> <b>2504610A and 2504610B:</b> Influent-04-23-25, Effluent-04-23-25			

Review Item or Question		Yes	No	NA	Comments
<b>Chain-of-Custody and Data Completeness</b>					
1	Was COC appropriately completed?	X			
2	Did the laboratory report correct sample IDs?	X			
3	Do the laboratory reported sample collection dates and times agree with the COC forms?	X			
4	Are results reported for all analytical methods requested?	X			
5	Are results reported for all samples submitted for analysis?	X			
6	Were the requested analytical methods used?	X			
7	Are results reported for all target analytes, but no additional analytes?	X			
8	<b>SOIL/SEDIMENT ONLY:</b> Were soil/sediment results reported on a dry weight basis?			X	
9	If requested, were detected results below reporting limit (i.e., "J" values) reported?		X		Results were reported by the laboratory to the reporting limit (RL).
10	Did we receive the required deliverables (e.g., EDD, Level 4 data, laboratory certification, etc.) in the correct formats?	X			



## Analytical Data Review Checklist

Review Item or Question		Yes	No	NA	Comments
<b>Sample Preservation</b>					
11a	Did samples arrive at the laboratory appropriately preserved?			X	
11b	Was the cooler temperature between 0-6°C?			X	
11c	Was acid used for preservation when required (e.g., aqueous VOC and metals samples)?			X	
11d	<b>SOIL/SEDIMENT ONLY:</b> Were soil/sediment VOC samples preserved in the field or collected in EnCore® samplers?			X	
12	Were samples received by the laboratory in an acceptable condition (i.e., no breakages, leaks, etc.)?	X			
13	Were any issues noted by the laboratory upon receipt?		X		
14a	<b>AIR ONLY:</b> Were canisters received with an acceptable vacuum?			X	Tedlar bags were used for sample collection for both TO-15 and TO-3 analysis.
14b	<b>AIR ONLY:</b> Were the RPDs between the initial and final canister flow controller calibrations <20%?			X	
<b>Holding Times</b>					
15	Were sample preparation and analysis holding time requirements met?	X			
<b>Reporting Limits</b>					
16	Do the reporting limits meet the project specifications (e.g., QAPP or Work Plan)?	X			
17	Were dilutions performed? If so, note sample(s) and parameters(s) affected and the dilution factor(s).	X			Influent-04-23-24: BTEX (TO-15): 12.5-fold, TPH (TO-3): 200-fold
18	Did the laboratory provide an adequate explanation as to why dilutions were performed?	X			Sample Influent-04-23-25 was diluted for both TO-15 and TO-3 analyses due to the presence of high levels of target analytes.
<b>QC Results</b>					
<b>Blanks</b>					
19	Were target analytes detected in the method blanks? If yes, list contaminants, concentrations detected and associated samples.		X		
20	Does each analytical or preparation batch have its own method blank?	X			
21	Were any target analytes detected in the field blank(s) (e.g., trip blanks, equipment blanks)? If yes, list contaminants, concentrations detected and associated samples (or attach field blank results).			X	
22	Are there any potential false positive results based on questions 19 and/or 21?		X		



## Analytical Data Review Checklist

Review Item or Question	Yes	No	NA	Comments
<b>Laboratory Control Spikes</b>				
23	Are LCS/LCSD recoveries within QC limits? If no, list analytes affected, the LCS/LCSD recoveries, and the affected samples.	X		
24	Does each analytical or preparation batch have its own LCS?	X		
25	Are LCS/LCSD RPDs within QC limits? If no, list analytes affected, the RPDs, and the affected samples.			X LCS/LCSD RPDs were not calculated and reported by the laboratory. Calculations performed during validation indicated the RPDs were within typical guidance limits (i.e., 20%).
<b>Matrix Spikes</b>				
26	Are MS/MSD recoveries within QC limits? If no, list analytes affected, the MS/MSD recoveries and the sample that was spiked.			X
27	Are MS/MSD RPDs within QC limits? If no, list analytes affected, the RPDs and the sample that was spiked.			X
<b>Surrogates</b>				
28	<b>ORGANIC ANALYSES ONLY:</b> Are surrogate recoveries within QC limits? If no, list samples, surrogate recoveries and analytes affected.		X	The TO-15 surrogate percent recovery (%R) for toluene-d8 (166%) was above the laboratory control limits (70-130%) in sample Influent-04-23-25. <b>The positive results for all BTEX analytes in sample Influent-04-23-25 were qualified as estimated (J).</b> Bias was not applied since these results were also qualified due to sample collection outside the scope of Method TO-15 (discussed in Review Item 31).
<b>Duplicates</b>				
29	Are laboratory duplicate RPDs within QC limits? If no, list analytes affected, the RPDs and the sample that was prepared/analyzed in duplicate.			X
30	Were field duplicate criteria met? Refer to RPD and/or Tips tabs for typical criteria. If no, list analytes affected, the RPD and/or absolute difference (as applicable), and the associated samples.			X



## Analytical Data Review Checklist

Review Item or Question	Yes	No	NA	Comments
<b>Do the Data Make Sense?</b>				
31		X		Tedlar bags were used for sample collection for TO-15 analysis. Method TO-15 is validated for samples collected in specially treated canisters. The use of Tedlar bags for sample collection is outside the scope of Method TO-15. <b>Therefore, the positive results for all BTEX analytes in sample Influent-04-23-25 were qualified as estimated (J) and the nondetect results for all BTEX analytes in sample Effluent-04-23-25 were qualified as estimated (UJ).</b>
32		X		
33		X		
34	X			
<b>Additional Comments:</b>				
The table attachment summarizes the validation qualifiers.				

**Notes:**

The EPA Superfund Contract Laboratory Program (CLP) National Functional Guidelines (NFGs) for Data Review (November, 2020) or most recent version found here:  
<https://www.epa.gov/clp/superfund-clp-national-functional-guidelines-data-review>

**Abbreviations:**

- BTEX Benzene, Toluene, Ethylbenzene, Xylenes
- COC Chain-of-Custody
- EDD Electronic Data Deliverable
- LCS/LCSD Laboratory Control Sample / Laboratory Control Sample Duplicate
- MS/MSD Matrix Spike / Matrix Spike Duplicate
- QAPP Quality Assurance Project Plan
- QC Quality Control
- %R Percent Recovery
- RL Reporting Limit
- RPD Relative Percent Difference
- TPH Total Petroleum Hydrocarbons
- VOC Volatile Organic Compound

## Table of Qualified Analytical Results

Sample ID	Lab ID	Method	Diln	Compound/Analyte	Concentration	Qualifier	Reason Code(s)
<b>Lab Report 2504610A:</b>							
Influent-04-23-25	2504610A-01A	TO-15	12.5	Benzene	44,000 ppbv	J	SUR, QC
Influent-04-23-25	2504610A-01A	TO-15	12.5	Toluene	4,500 ppbv	J	SUR, QC
Influent-04-23-25	2504610A-01A	TO-15	12.5	Ethyl Benzene	9,600 ppbv	J	SUR, QC
Influent-04-23-25	2504610A-01A	TO-15	12.5	m,p-Xylene	10,000 ppbv	J	SUR, QC
Influent-04-23-25	2504610A-01A	TO-15	12.5	o-Xylene	1,800 ppbv	J	SUR, QC
Effluent-04-23-25	2504610A-02A	TO-15	1.00	Benzene	< 5.0 ppbv	UJ	QC
Effluent-04-23-25	2504610A-02A	TO-15	1.00	Toluene	< 5.0 ppbv	UJ	QC
Effluent-04-23-25	2504610A-02A	TO-15	1.00	Ethyl Benzene	< 5.0 ppbv	UJ	QC
Effluent-04-23-25	2504610A-02A	TO-15	1.00	m,p-Xylene	< 5.0 ppbv	UJ	QC
Effluent-04-23-25	2504610A-02A	TO-15	1.00	o-Xylene	< 5.0 ppbv	UJ	QC

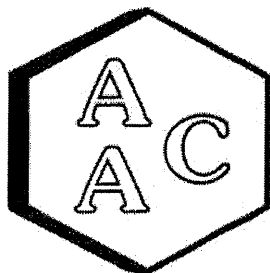
Please note that only the ppbv concentrations are listed in this table. Qualification is also applicable to the results reported in units of ug/m<sup>3</sup>.

**Qualifier Definitions:**

J detected result, estimated concentration  
 UJ nondetect result, estimated reporting limit

**Reason Code Definitions:**

SUR Surrogate spike recovery outlier; indicated or confirmed matrix interference  
 QC results qualified due to sample collection outside the scope of the method



## Atmospheric Analysis & Consulting, Inc.

---

CLIENT : TRC  
 PROJECT NAME : T970 EVE  
 PROJECT NO. : 639242  
 AAC PROJECT NO. : 251716  
 REPORT DATE : 07/17/2025

On July 9, 2025, Atmospheric Analysis & Consulting, Inc. received one (1) Six-Liter Silonite Canister and one (1) Tedlar Bag for Volatile Organic Compounds and Siloxanes analysis by EPA Method TO-15/TO-15M. Upon receipt, the samples were assigned unique Laboratory ID numbers as follows:

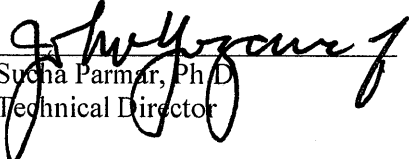
Client ID	Lab ID	Return Pressure (mmHga)
T970 EVE Influent	251716-77615	660.5
T970 EVE Influent	251716-77616	NA

**This analysis is accredited under the laboratory's ISO/IEC 17025:2017 accreditation issued by the ANSI National Accreditation Board. Refer to certificate and scope of accreditation AT-1908.** Test results apply to the sample(s) as received. For detailed information pertaining to specific EPA, NCASI, ASTM and SCAQMD accreditations (Methods & Analytes), please visit our website at [www.aaclab.com](http://www.aaclab.com).

I certify that this data is technically accurate, complete, and in compliance with the terms and conditions of the contract. Per client request, the sample labeled, "T970 EVE Influent (77616)" was placed on hold as a backup. No problems were encountered during receiving, preparation, and/or analysis of these samples.

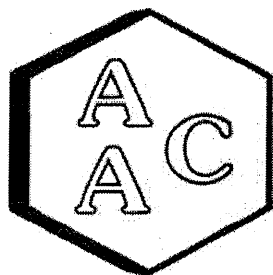
The Technical Director or his designee, as verified by the following signature, has authorized release of the data contained in this hardcopy report.

If you have any questions or require further explanation of data results, please contact the undersigned.

  
 Sucha Parmar, Ph.D.  
 Technical Director

This report consists of 12 pages.





# Atmospheric Analysis & Consulting, Inc.

## Laboratory Analysis Report

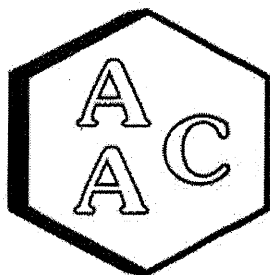
CLIENT : TRC  
 PROJECT NO : 251716  
 MATRIX : AIR  
 UNITS : PPB (v/v)

DATE RECEIVED : 07/09/2025  
 DATE REPORTED : 07/17/2025  
 ANALYST : DL/CH

### VOLATILE ORGANIC COMPOUNDS BY EPA TO-15

<i>Client ID</i>		<i>T970 EYE Influent</i>			<b>Sample Reporting Limit (SRL) (MRLxDF's)</b>	<b>Method Reporting Limit (MRL)</b>
<i>AAC ID</i>		<i>251716-77615</i>				
<i>Date Sampled</i>		<i>07/08/2025</i>				
<i>Date Analyzed</i>		<i>07/15/2025</i>				
<i>Can Dilution Factor</i>		<i>1.54</i>				
<i>Compound</i>	<b>Result</b>	<b>Qualifier</b>	<b>Analysis DF</b>			
Chlorodifluoromethane	<SRL	U	50	38.5	0.50	
Propene	692		50	77.0	1.00	
Dichlorodifluoromethane	<SRL	U	50	38.5	0.50	
Chloromethane	<SRL	U	50	38.5	0.50	
Dichlorotetrafluoroethane	<SRL	U	50	38.5	0.50	
Vinyl Chloride	<SRL	U	50	38.5	0.50	
Methanol	<SRL	U	50	385	5.00	
1,3-Butadiene	<SRL	U	50	38.5	0.50	
Bromomethane	<SRL	U	50	38.5	0.50	
Chloroethane	<SRL	U	50	38.5	0.50	
Dichlorofluoromethane	<SRL	U	50	38.5	0.50	
Ethanol	<SRL	U	50	154	2.00	
Vinyl Bromide	<SRL	U	50	38.5	0.50	
Acetone	<SRL	U	50	154	2.00	
Trichlorofluoromethane	<SRL	U	50	38.5	0.50	
2-Propanol (IPA)	<SRL	U	50	154	2.00	
Acrylonitrile	<SRL	U	50	77.0	1.00	
1,1-Dichloroethene	<SRL	U	50	38.5	0.50	
Methylene Chloride (DCM)	<SRL	U	50	77.0	1.00	
Allyl Chloride	<SRL	U	50	77.0	1.00	
Carbon Disulfide	404		50	154	2.00	
Trichlorotrifluoroethane	<SRL	U	50	38.5	0.50	
trans-1,2-Dichloroethene	<SRL	U	50	38.5	0.50	
1,1-Dichloroethane	<SRL	U	50	38.5	0.50	
Methyl Tert Butyl Ether (MTBE)	<SRL	U	50	38.5	0.50	
Vinyl Acetate	<SRL	U	50	38.5	0.50	
2-Butanone (MEK)	<SRL	U	50	77.0	1.00	
cis-1,2-Dichloroethene	<SRL	U	50	38.5	0.50	
Hexane	145000		5000	3850	0.50	
Chloroform	<SRL	U	50	38.5	0.50	
Ethyl Acetate	<SRL	U	50	38.5	0.50	
Tetrahydrofuran	<SRL	U	50	38.5	0.50	
1,2-Dichloroethane	<SRL	U	50	38.5	0.50	
1,1,1-Trichloroethane	<SRL	U	50	38.5	0.50	
Benzene	45500		500	385	0.50	





# Atmospheric Analysis & Consulting, Inc.

## Laboratory Analysis Report

CLIENT : TRC  
 PROJECT NO : 251716  
 MATRIX : AIR  
 UNITS : PPB (v/v)

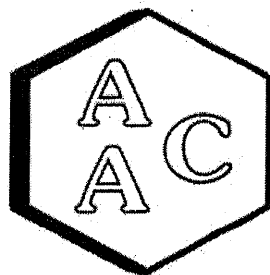
DATE RECEIVED : 07/09/2025  
 DATE REPORTED : 07/17/2025  
 ANALYST : DL/CH

### VOLATILE ORGANIC COMPOUNDS BY EPA TO-15

Client ID		T970 EVE Influent		Sample Reporting Limit (SRL) (MRLxDF's)	Method Reporting Limit (MRL)
AAC ID		251716-77615			
Date Sampled		07/08/2025			
Date Analyzed		07/15/2025			
Can Dilution Factor		1.54			
Compound	Result	Qualifier	Analysis DF		
Carbon Tetrachloride	<SRL	U	50	38.5	0.50
Cyclohexane	214000		5000	3850	0.50
1,2-Dichloropropane	<SRL	U	50	38.5	0.50
Bromodichloromethane	<SRL	U	50	38.5	0.50
1,4-Dioxane	<SRL	U	50	77.0	1.00
Trichloroethene (TCE)	<SRL	U	50	38.5	0.50
2,2,4-Trimethylpentane	<SRL	U	50	38.5	0.50
Heptane	88800		5000	3850	0.50
cis-1,3-Dichloropropene	<SRL	U	50	38.5	0.50
4-Methyl-2-pentanone (MiBK)	<SRL	U	50	38.5	0.50
trans-1,3-Dichloropropene	<SRL	U	50	38.5	0.50
1,1,2-Trichloroethane	<SRL	U	50	38.5	0.50
Toluene	23700		500	385	0.50
2-Hexanone (MBK)	<SRL	U	50	77.0	1.00
Dibromochloromethane	<SRL	U	50	38.5	0.50
1,2-Dibromoethane	<SRL	U	50	38.5	0.50
Tetrachloroethene (PCE)	<SRL	U	50	38.5	0.50
Chlorobenzene	<SRL	U	50	38.5	0.50
Ethylbenzene	10500		500	385	0.50
m & p-Xylene	13000		50	77.0	1.00
Bromoform	<SRL	U	50	38.5	0.50
Styrene	<SRL	U	50	38.5	0.50
1,1,2,2-Tetrachloroethane	<SRL	U	50	38.5	0.50
o-Xylene	2630		50	38.5	0.50
4-Ethyltoluene	1730		50	38.5	0.50
1,3,5-Trimethylbenzene	558		50	38.5	0.50
1,2,4-Trimethylbenzene	1270		50	38.5	0.50
Benzyl Chloride (a-Chlorotoluene)	<SRL	U	50	38.5	0.50
1,3-Dichlorobenzene	<SRL	U	50	38.5	0.50
1,4-Dichlorobenzene	<SRL	U	50	38.5	0.50
1,2-Dichlorobenzene	<SRL	U	50	38.5	0.50
1,2,4-Trichlorobenzene	<SRL	U	50	38.5	0.50
Hexachlorobutadiene	<SRL	U	50	38.5	0.50
BFB-Surrogate Std. % Recovery		100%			50-150%

U - Compound was not detected at or above the SRL.





# Atmospheric Analysis & Consulting, Inc.

## Laboratory Analysis Report

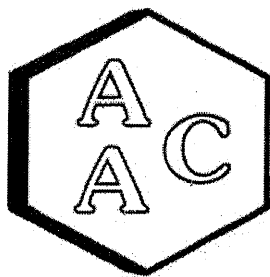
CLIENT : TRC  
 PROJECT NO : 251716  
 MATRIX : AIR  
 UNITS : µg/m³

DATE RECEIVED : 07/09/2025  
 DATE REPORTED : 07/17/2025  
 ANALYST : DL/CH

### VOLATILE ORGANIC COMPOUNDS BY EPA TO-15

Client ID	1970 EVE Influent			Sample Reporting Limit (SRL) (MRLxDF's)	Method Reporting Limit (MRL)
AAC ID	Result	Qualifier	Analysis DF		
Date Sampled	251716-77615				
Date Analyzed	07/08/2025				
Can Dilution Factor	07/15/2025				
Compound	1.54				
Chlorodifluoromethane	<SRL	U	50	136	1.8
Propene	1190		50	133	1.7
Dichlorodifluoromethane	<SRL	U	50	190	2.5
Chloromethane	<SRL	U	50	79.5	1.0
Dichlorotetrafluoroethane	<SRL	U	50	269	3.5
Vinyl Chloride	<SRL	U	50	98.4	1.3
Methanol	<SRL	U	50	504	6.6
1,3-Butadiene	<SRL	U	50	85.2	1.1
Bromomethane	<SRL	U	50	149	1.9
Chloroethane	<SRL	U	50	102	1.3
Dichlorofluoromethane	<SRL	U	50	162	2.1
Ethanol	<SRL	U	50	290	3.8
Vinyl Bromide	<SRL	U	50	168	2.2
Acetone	<SRL	U	50	366	4.8
Trichlorofluoromethane	<SRL	U	50	216	2.8
2-Propanol (IPA)	<SRL	U	50	378	4.9
Acrylonitrile	<SRL	U	50	167	2.2
1,1-Dichloroethene	<SRL	U	50	153	2.0
Methylene Chloride (DCM)	<SRL	U	50	267	3.5
Allyl Chloride	<SRL	U	50	241	3.1
Carbon Disulfide	1260		50	479	6.2
Trichlorotrifluoroethane	<SRL	U	50	295	3.8
trans-1,2-Dichloroethene	<SRL	U	50	153	2.0
1,1-Dichloroethane	<SRL	U	50	156	2.0
Methyl Tert Butyl Ether (MTBE)	<SRL	U	50	139	1.8
Vinyl Acetate	<SRL	U	50	136	1.8
2-Butanone (MEK)	<SRL	U	50	227	2.9
cis-1,2-Dichloroethene	<SRL	U	50	153	2.0
Hexane	511000		5000	13600	1.8
Chloroform	<SRL	U	50	188	2.4
Ethyl Acetate	<SRL	U	50	139	1.8
Tetrahydrofuran	<SRL	U	50	114	1.5
1,2-Dichloroethane	<SRL	U	50	156	2.0
1,1,1-Trichloroethane	<SRL	U	50	210	2.7
Benzene	145000		500	1230	1.6





# Atmospheric Analysis & Consulting, Inc.

## Laboratory Analysis Report

CLIENT : TRC  
 PROJECT NO : 251716  
 MATRIX : AIR  
 UNITS : µg/m³

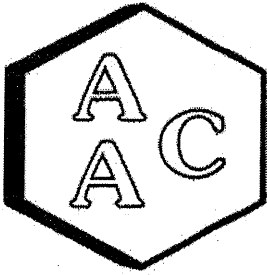
DATE RECEIVED : 07/09/2025  
 DATE REPORTED : 07/17/2025  
 ANALYST : DL/CH

### VOLATILE ORGANIC COMPOUNDS BY EPA TO-15

Client ID	T970 EVE Influent			Sample Reporting Limit (SRL) (MRLxDF's)	Method Reporting Limit (MRL)
AAC ID	Result	Qualifier	Analysis DF		
Date Sampled	251716-77615				
Date Analyzed	07/08/2025				
Can Dilution Factor	07/15/2025				
Compound	1.54				
Carbon Tetrachloride	<SRL	U	50	242	3.1
Cyclohexane	738000		5000	13300	1.7
1,2-Dichloropropane	<SRL	U	50	178	2.3
Bromodichloromethane	<SRL	U	50	258	3.4
1,4-Dioxane	<SRL	U	50	277	3.6
Trichloroethene (TCE)	<SRL	U	50	207	2.7
2,2,4-Trimethylpentane	<SRL	U	50	180	2.3
Heptane	364000		5000	15800	2.0
cis-1,3-Dichloropropene	<SRL	U	50	175	2.3
4-Methyl-2-pentanone (MiBK)	<SRL	U	50	158	2.0
trans-1,3-Dichloropropene	<SRL	U	50	175	2.3
1,1,2-Trichloroethane	<SRL	U	50	210	2.7
Toluene	89200		500	1450	1.9
2-Hexanone (MBK)	<SRL	U	50	315	4.1
Dibromochloromethane	<SRL	U	50	328	4.3
1,2-Dibromoethane	<SRL	U	50	296	3.8
Tetrachloroethene (PCE)	<SRL	U	50	261	3.4
Chlorobenzene	<SRL	U	50	177	2.3
Ethylbenzene	45400		500	1670	2.2
m & p-Xylene	56300		50	334	4.3
Bromoform	<SRL	U	50	398	5.2
Styrene	<SRL	U	50	164	2.1
1,1,2,2-Tetrachloroethane	<SRL	U	50	264	3.4
o-Xylene	11400		50	167	2.2
4-Ethyltoluene	8490		50	189	2.5
1,3,5-Trimethylbenzene	2740		50	189	2.5
1,2,4-Trimethylbenzene	6260		50	189	2.5
Benzyl Chloride (a-Chlorotoluene)	<SRL	U	50	199	2.6
1,3-Dichlorobenzene	<SRL	U	50	231	3.0
1,4-Dichlorobenzene	<SRL	U	50	231	3.0
1,2-Dichlorobenzene	<SRL	U	50	231	3.0
1,2,4-Trichlorobenzene	<SRL	U	50	286	3.7
Hexachlorobutadiene	<SRL	U	50	411	5.3
BFB-Surrogate Std. % Recovery		100%			50-150%

U - Compound was not detected at or above the SRL.





# Atmospheric Analysis & Consulting, Inc.

## Laboratory Analysis Report

CLIENT : TRC  
 PROJECT NO : 251716  
 MATRIX : AIR  
 UNITS : PPB (v/v)

DATE RECEIVED : 07/09/2025  
 DATE REPORTED : 07/17/2025  
 ANALYST : DL/CH

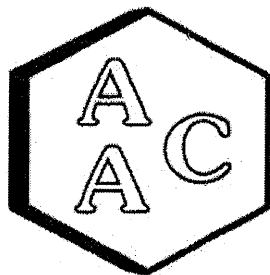
### SILOXANES BY EPA TO-15

<i>Client ID</i>	<i>1970 EYE Influent</i>		
<i>AAC ID</i>	<i>251716-77615</i>		
<i>Date Sampled</i>	<i>07/08/2025</i>		
<i>Date Analyzed</i>	<i>07/15/2025</i>		
<i>Canister Dilution Factor</i>	<i>1.54</i>		
<i>Compound</i>	<i>Result</i>	<i>Analysis DF</i>	<i>SRL</i>
Trimethylsilanol*	<SRL	50	77.0
Tetramethylsilane	<SRL	50	77.0
Hexamethyldisiloxane (L2)	<SRL	50	77.0
Hexamethylcyclotrisiloxane (D3)	<SRL	50	77.0
Octamethyltrisiloxane (L3)	<SRL	50	77.0
Octamethylcyclotetrasiloxane (D4)	<SRL	50	77.0
Decamethyltetrasiloxane (L4)	<SRL	50	77.0
Decamethylcyclopentasiloxane (D5)	<SRL	50	77.0
Dodecamethylpentasiloxane (L5)*	<SRL	50	77.0
BFB-Surrogate Std. % Recovery	100%		50-150%

SRL - Sample Reporting Limit

\*Results and SRL are estimated





# Atmospheric Analysis & Consulting, Inc.

## Laboratory Analysis Report

CLIENT : TRC  
 PROJECT NO : 251716  
 MATRIX : AIR  
 UNITS :  $\mu\text{g}/\text{m}^3$

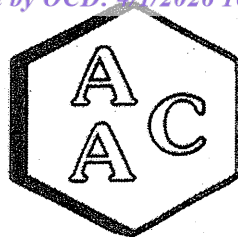
DATE RECEIVED : 07/09/2025  
 DATE REPORTED : 07/17/2025  
 ANALYST : DL/CH

### SILOXANES BY EPA TO-15

<i>Client ID</i>		<b>T970 EVE Influent</b>	
<i>AAC ID</i>		<b>251716-77615</b>	
<i>Date Sampled</i>		<b>07/08/2025</b>	
<i>Date Analyzed</i>		<b>07/15/2025</b>	
<i>Canister Dilution Factor</i>		<b>1.54</b>	
<i>Compound</i>	<b>Result</b>	<b>Analysis DF</b>	<b>SRL</b>
Trimethylsilanol*	<SRL	50	284
Tetramethylsilane	<SRL	50	278
Hexamethyldisiloxane (L2)	<SRL	50	511
Hexamethylcyclotrisiloxane (D3)	<SRL	50	700
Octamethyltrisiloxane (L3)	<SRL	50	745
Octamethylcyclotetrasiloxane (D4)	<SRL	50	934
Decamethyltetrasiloxane (L4)	<SRL	50	978
Decamethylcyclopentasiloxane (D5)	<SRL	50	1170
Dodecamethylpentasiloxane (L5)*	<SRL	50	1210
BFB-Surrogate Std. % Recovery	100%		50-150%

SRL - Sample Reporting Limit  
 \*Results and SRL are estimated





# Atmospheric Analysis & Consulting, Inc.

## QUALITY CONTROL / QUALITY ASSURANCE REPORT

ANALYSIS DATE : 07/15/2025

MATRIX : High Purity N<sub>2</sub>

UNITS : PPB (v/v)

INSTRUMENT ID : GC/MS-04

CALIBRATION STD ID : MS1-041725-01

ANALYST : DL

### VOLATILE ORGANIC COMPOUNDS BY EPA METHOD TO-15

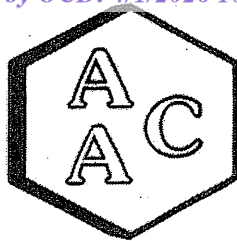
Continuing Calibration Verification of the 06/25/2025 Calibration

Analyte Compounds	Source <sup>1</sup>	CCV <sup>2</sup>	% Recovery <sup>3</sup>
4-BFB (surrogate standard)	9.40	9.50	101
Chlorodifluoromethane	10.20	10.11	99
Propene	10.70	11.07	103
Dichlorodifluoromethane	10.40	12.94	124
Dimethyl Ether	10.10	10.69	106
Chloromethane	10.50	10.64	101
Dichlorotetrafluoroethane	10.20	12.19	120
Vinyl Chloride	10.60	11.25	106
Acetaldehyde	20.90	20.61	99
Methanol	20.40	16.11	79
1,3-Butadiene	10.70	11.40	107
Bromomethane	10.40	10.51	101
Chloroethane	10.40	9.21	89
Dichlorofluoromethane	10.10	10.47	104
Ethanol	11.40	9.77	86
Vinyl Bromide	10.10	10.59	105
Acrolein	10.90	11.83	109
Acetone	10.60	10.79	102
Trichlorofluoromethane	10.50	10.82	103
2-Propanol (IPA)	11.00	11.14	101
Acrylonitrile	11.10	11.76	106
1,1-Dichloroethene	10.50	11.03	105
Methylene Chloride (DCM)	10.40	10.54	101
TertButanol (TBA)	11.20	11.54	103
Allyl Chloride	10.20	10.45	102
Carbon Disulfide	10.50	11.19	107
Trichlorotrifluoroethane	10.30	10.37	101
trans-1,2-Dichloroethene	10.80	11.23	104
1,1-Dichloroethane	10.70	11.12	104
Methyl Tert Butyl Ether (MTBE)	10.70	11.41	107
Vinyl Acetate	11.00	11.54	105
2-Butanone (MEK)	10.70	11.44	129
cis-1,2-Dichloroethene	10.70	11.13	104
Hexane	10.80	13.02	129
Chloroform	10.70	11.17	104
Ethyl Acetate	10.70	10.82	101
Tetrahydrofuran	10.40	10.89	105
1,2-Dichloroethane	10.60	11.12	105
1,1,1-Trichloroethane	10.50	10.85	103
Benzene	10.70	10.95	102
Carbon Tetrachloride	10.30	10.44	101
Cyclohexane	10.50	10.77	103

Analyte Compounds (Continued)	Source <sup>1</sup>	CCV <sup>2</sup>	% Recovery <sup>3</sup>
1,2-Dichloropropane	10.70	11.03	103
Bromodichloromethane	10.50	11.12	106
1,4-Dioxane	10.50	10.95	104
Trichloroethene (TCE)	10.50	10.98	105
2,2,4-Trimethylpentane	10.10	10.30	102
Methyl Methacrylate	11.00	11.33	103
Heptane	10.50	11.03	105
cis-1,3-Dichloropropene	10.50	11.51	110
4-Methyl-2-pentanone (MiBK)	10.50	10.29	98
trans-1,3-Dichloropropene	10.60	11.39	107
1,1,2-Trichloroethane	10.60	11.22	106
Toluene	10.80	11.36	105
2-Hexanone (MBK)	10.50	11.90	113
Dibromochloromethane	10.60	11.04	104
1,2-Dibromoethane	10.60	11.33	107
Tetrachloroethene (PCE)	10.50	10.94	104
Chlorobenzene	10.80	10.76	100
Ethylbenzene	10.60	11.01	104
m & p-Xylene	21.20	21.73	103
Bromofonn	10.60	10.47	99
Styrene	10.60	10.99	104
1,1,2,2-Tetrachloroethane	10.60	10.75	101
o-Xylene	10.60	10.60	100
1,2,3-Trichloropropane	11.00	11.34	103
Isopropylbenzene (Cumene)	10.40	10.60	102
α-Pinene	10.80	11.78	109
2-Chlorotoluene	10.30	10.58	103
n-Propylbenzene	10.10	10.26	102
4-Ethyltoluene	10.40	10.61	102
1,3,5-Trimethylbenzene	10.30	10.44	101
β-Pinene	10.90	10.59	97
1,2,4-Trimethylbenzene	10.30	10.12	98
Benzyl Chloride (a-Chlorotoluene)	10.30	9.29	90
1,3-Dichlorobenzene	10.30	10.76	104
1,4-Dichlorobenzene	10.20	10.76	105
Sec-ButylBenzene	10.00	10.13	101
1,2-Dichlorobenzene	10.40	10.50	101
n-ButylBenzene	10.20	9.58	94
1,2-Dibromo-3-Chloropropane	10.10	9.75	97
1,2,4-Trichlorobenzene	10.50	9.70	92
Naphthalene	10.90	8.76	80
Hexachlorobutadiene	10.80	9.34	86

<sup>1</sup> Concentration of analyte compound in certified source standard.<sup>2</sup> Measured result from daily Continuing Calibration Verification (CCV).<sup>3</sup> The acceptable range for analyte recovery is 100±30%.

\* - β-Pinene results are estimated.



# Atmospheric Analysis & Consulting, Inc.

## QUALITY CONTROL / QUALITY ASSURANCE REPORT

ANALYSIS DATE : 07/15/2025

INSTRUMENT ID : GC/MS-04

MATRIX : High Purity N<sub>2</sub>

CALIBRATION STD ID : MS1-041725-01

UNITS : PPB (v/v)

ANALYST : DL

### VOLATILE ORGANIC COMPOUNDS BY EPA METHOD TO-15

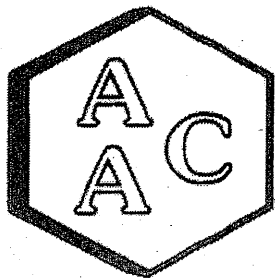
#### Laboratory Control Spike Analysis

System Monitoring Compounds	Sample Concentration	Spike Added	LCS <sup>1</sup> Recovery	LCSD <sup>1</sup> Recovery	LCS <sup>1</sup> % Recovery <sup>2</sup>	LCSD <sup>1</sup> % Recovery <sup>2</sup>	RPD <sup>3</sup>
4-BFB (surrogate standard)	0.0	9.40	9.50	9.57	101	102	0.7
1,1-Dichloroethene	0.0	10.50	11.03	10.84	105	103	1.7
Methylene Chloride (DCM)	0.0	10.40	10.54	11.23	101	108	6.3
Benzene	0.0	10.70	10.95	11.29	102	106	3.1
Trichloroethene (TCE)	0.0	10.50	10.98	11.26	105	107	2.5
Toluene	0.0	10.80	11.36	11.56	105	107	1.7
Tetrachloroethene (PCE)	0.0	10.50	10.94	11.16	104	106	2.0
Chlorobenzene	0.0	10.80	10.76	11.30	100	105	4.9
Ethylbenzene	0.0	10.60	11.01	11.17	104	105	1.4
m & p-Xylene	0.0	21.20	21.73	21.96	103	104	1.1
o-Xylene	0.0	10.60	10.60	10.79	100	102	1.8

<sup>1</sup> Laboratory Control Spike (LCS) / Laboratory Control Spike Duplicate (LCSD)

<sup>2</sup> The acceptable range for analyte recovery is 100±30%.

<sup>3</sup> Relative Percent Difference (RPD) between LCS recovery and LCSD recovery (acceptable range is <25%).



# Atmospheric Analysis & Consulting, Inc.

## QUALITY CONTROL / QUALITY ASSURANCE REPORT

ANALYSIS DATE : 07/15/2025

INSTRUMENT ID : GC/MS-04

MATRIX : High Purity He or N<sub>2</sub>

ANALYST : DL

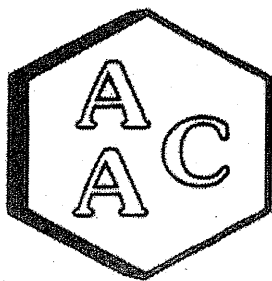
UNITS : PPB (v/v)

### VOLATILE ORGANIC COMPOUNDS BY EPA METHOD TO-15

Method Blank Analysis

Analyte Compounds	MB 071525	Reporting Limit (RL)	Analyte Compounds (Continued)	MB 071525	Reporting Limit (RL)
4-BFB (surrogate standard)	89%	100±30%	1,2-Dichloropropane	<RL	0.5
Chlorodifluoromethane	<RL	0.5	Bromodichloromethane	<RL	0.5
Propene	<RL	1.0	1,4-Dioxane	<RL	1.0
Dichlorodifluoromethane	<RL	0.5	Trichloroethene (TCE)	<RL	0.5
Dimethyl Ether	<RL	0.5	2,2,4-Trimethylpentane	<RL	0.5
Chloromethane	<RL	0.5	Methyl Methacrylate	<RL	0.5
Dichlorotetrafluoroethane	<RL	0.5	Heptane	<RL	0.5
Vinyl Chloride	<RL	0.5	cis-1,3-Dichloropropene	<RL	0.5
Acetaldehyde	<RL	5.0	4-Methyl-2-pentanone (MiBK)	<RL	0.5
Methanol	<RL	5.0	trans-1,3-Dichloropropene	<RL	0.5
1,3-Butadiene	<RL	0.5	1,1,2-Trichloroethane	<RL	0.5
Bromomethane	<RL	0.5	Toluene	<RL	0.5
Chloroethane	<RL	0.5	2-Hexanone (MBK)	<RL	1.0
Dichlorofluoromethane	<RL	0.5	Dibromochloromethane	<RL	0.5
Ethanol	<RL	2.0	1,2-Dibromoethane	<RL	0.5
Vinyl Bromide	<RL	0.5	Tetrachloroethene (PCE)	<RL	0.5
Acrolein	<RL	1.0	Chlorobenzene	<RL	0.5
Acetone	<RL	2.0	Ethylbenzene	<RL	0.5
Trichlorofluoromethane	<RL	0.5	m & p-Xylene	<RL	1.0
2-Propanol (IPA)	<RL	2.0	Bromoform	<RL	0.5
Acrylonitrile	<RL	1.0	Styrene	<RL	0.5
1,1-Dichloroethene	<RL	0.5	1,1,2,2-Tetrachloroethane	<RL	0.5
Methylene Chloride (DCM)	<RL	1.0	o-Xylene	<RL	0.5
TertButanol (TBA)	<RL	0.5	1,2,3-Trichloropropane	<RL	0.5
Allyl Chloride	<RL	1.0	Isopropylbenzene (Cumene)	<RL	0.5
Carbon Disulfide	<RL	2.0	α-Pinene	<RL	0.5
Trichlorotrifluoroethane	<RL	0.5	2-Chlorotoluene	<RL	0.5
trans-1,2-Dichloroethene	<RL	0.5	n-Propylbenzene	<RL	0.5
1,1-Dichloroethane	<RL	0.5	4-Ethyltoluene	<RL	0.5
Methyl Tert Butyl Ether (MTBE)	<RL	0.5	1,3,5-Trimethylbenzene	<RL	0.5
Vinyl Acetate	<RL	0.5	β-Pinene	<RL	0.5
2-Butanone (MEK)	<RL	1.0	1,2,4-Trimethylbenzene	<RL	0.5
cis-1,2-Dichloroethene	<RL	0.5	Benzyl Chloride (a-Chlorotoluene)	<RL	0.5
Hexane	<RL	0.5	1,3-Dichlorobenzene	<RL	0.5
Chloroform	<RL	0.5	1,4-Dichlorobenzene	<RL	0.5
Ethyl Acetate	<RL	0.5	Sec-Butylbenzene	<RL	0.5
Tetrahydrofuran	<RL	0.5	1,2-Dichlorobenzene	<RL	0.5
1,2-Dichloroethane	<RL	0.5	n-Butylbenzene	<RL	0.5
1,1,1-Trichloroethane	<RL	0.5	1,2-Dibromo-3-Chloropropane	<RL	0.5
Benzene	<RL	0.5	1,2,4-Trichlorobenzene	<RL	0.5
Carbon Tetrachloride	<RL	0.5	Naphthalene	<RL	0.5
Cyclohexane	<RL	0.5	Hexachlorobutadiene	<RL	0.5





# Atmospheric Analysis & Consulting, Inc.

## QUALITY CONTROL / QUALITY ASSURANCE REPORT

ANALYSIS DATE : 07/15/2025  
 MATRIX : Air  
 UNITS : PPB (v/v)

INSTRUMENT ID : GC/MS-04  
 ANALYST : DL  
 DILUTION FACTOR<sup>1</sup> : x35.12

### VOLATILE ORGANIC COMPOUNDS BY EPA METHOD TO-15 Duplicate Analysis of AAC Sample ID: 251645-77358

Analyte Compounds	Sample	Duplicate	RPD <sup>2</sup>
4-BFB (surrogate standard)	8.65	8.54	1.3
Chlorodifluoromethane	<SRL	<SRL	
Propene	2100	2090	0.5
Dichlorodifluoromethane	<SRL	<SRL	
Dimethyl Ether	<SRL	<SRL	
Chloromethane	<SRL	<SRL	
Dichlorotetrafluoroethane	<SRL	<SRL	
Vinyl Chloride	<SRL	<SRL	
Acetaldehyde	<SRL	<SRL	
Methanol	<SRL	<SRL	
1,3-Butadiene	<SRL	<SRL	
Bromomethane	<SRL	<SRL	
Chloroethane	<SRL	<SRL	
Dichlorofluoromethane	<SRL	<SRL	
Ethanol	<SRL	<SRL	
Vinyl Bromide	<SRL	<SRL	
Acrolein	<SRL	<SRL	
Acetone	<SRL	<SRL	
Trichlorofluoromethane	<SRL	<SRL	
2-Propanol (IPA)	<SRL	<SRL	
Acrylonitrile	<SRL	<SRL	
1,1-Dichloroethene	<SRL	<SRL	
Methylene Chloride (DCM)	<SRL	<SRL	
TertButanol (TBA)	<SRL	<SRL	
Allyl Chloride	<SRL	<SRL	
Carbon Disulfide	<SRL	<SRL	
Trichlorotrifluoroethane	<SRL	<SRL	
trans-1,2-Dichloroethene	<SRL	<SRL	
1,1-Dichloroethane	<SRL	<SRL	
Methyl Tert Butyl Ether (MTBE)	<SRL	<SRL	
Vinyl Acetate	<SRL	<SRL	
2-Butanone (MEK)	<SRL	<SRL	
cis-1,2-Dichloroethene	<SRL	<SRL	
Hexane	<SRL	<SRL	
Chloroform	<SRL	<SRL	
Ethyl Acetate	<SRL	<SRL	
Tetrahydrofuran	<SRL	<SRL	
1,2-Dichloroethane	<SRL	<SRL	
1,1,1-Trichloroethane	<SRL	<SRL	
Benzene	<SRL	<SRL	
Carbon Tetrachloride	<SRL	<SRL	
Cyclohexane	<SRL	<SRL	

Analyte Compounds (Continued)	Sample	Duplicate	RPD <sup>2</sup>
1,2-Dichloropropane	<SRL	<SRL	
Bromodichloromethane	<SRL	<SRL	
1,4-Dioxane	<SRL	<SRL	
Trichloroethene (TCE)	<SRL	<SRL	
2,2,4-Trimethylpentane	<SRL	<SRL	
Methyl Methacrylate	<SRL	<SRL	
Heptane	<SRL	<SRL	
cis-1,3-Dichloropropene	<SRL	<SRL	
4-Methyl-2-pentanone (MiBK)	<SRL	<SRL	
trans-1,3-Dichloropropene	<SRL	<SRL	
1,1,2-Trichloroethane	<SRL	<SRL	
Toluene	<SRL	<SRL	
2-Hexanone (MBK)	<SRL	<SRL	
Dibromochloromethane	<SRL	<SRL	
1,2-Dibromoethane	<SRL	<SRL	
Tetrachloroethene (PCE)	<SRL	<SRL	
Chlorobenzene	<SRL	<SRL	
Ethylbenzene	<SRL	<SRL	
m & p-Xylene	<SRL	<SRL	
Bromoform	<SRL	<SRL	
Styrene	<SRL	<SRL	
1,1,2,2-Tetrachloroethane	<SRL	<SRL	
o-Xylene	<SRL	<SRL	
1,2,3-Trichloropropane	<SRL	<SRL	
Isopropylbenzene (Cumene)	<SRL	<SRL	
α-Pinene	<SRL	<SRL	
2-Chlorotoluene	<SRL	<SRL	
n-Propylbenzene	<SRL	<SRL	
4-Ethyltoluene	<SRL	<SRL	
1,3,5-Trimethylbenzene	<SRL	<SRL	
β-Pinene	<SRL	<SRL	
1,2,4-Trimethylbenzene	<SRL	<SRL	
Benzyl Chloride (a-Chlorotoluene)	<SRL	<SRL	
1,3-Dichlorobenzene	<SRL	<SRL	
1,4-Dichlorobenzene	<SRL	<SRL	
Sec-ButylBenzene	<SRL	<SRL	
1,2-Dichlorobenzene	<SRL	<SRL	
n-ButylBenzene	<SRL	<SRL	
1,2-Dibromo-3-Chloropropane	<SRL	<SRL	
1,2,4-Trichlorobenzene	<SRL	<SRL	
Naphthalene	<SRL	<SRL	
Hexachlorobutadiene	<SRL	<SRL	

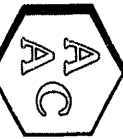
<sup>1</sup> Dilution factor is the product of the Canister Dilution Factor and the Analysis Dilution Factor.

<sup>2</sup> Relative Percent Difference (RPD) between Sample analysis and Duplicate analysis (acceptable range is <25%).

SRL - Sample Reporting Limit (minimum)



251716



**CHAIN OF CUSTODY AND ANALYSIS REQUEST** - Chain of Custody is a LEGAL DOCUMENT. Complete all relevant fields.

Atmospheric Analysis and Consulting · Phone: 805-650-1642 · Email: info@aaclab.com · 1534 Eastman Ave Suite A, Ventura, CA 93003

Client/Company Name TRC / HESMA Project Manager Name Merianne Link		Project Name T970 SVC Project Number 639242		Sampler Name Robert Nischay Print: ROBERT ALEKAY Signature: <i>[Signature]</i>		Analysis Requested ASTM D5504 EPA TO-15 EPM TO-15M		AAC Project No.: Send Report To (Name/Email/Address) Merianne Link Print: Merianne Link PO Number 639242	
Turnaround Time <input type="checkbox"/> Rush 24 h <input type="checkbox"/> Rush 48 h <input type="checkbox"/> Rush 72 h <input type="checkbox"/> Same Day <input checked="" type="checkbox"/> 5 Days <input type="checkbox"/> Normal		Sample ID T970 SVC Influent 7761V 7761G		Sampling Date 7/8/25 0900		Container Type/Qty 6/12/11		LAB USE ONLY Lab ID Sample Received via: <input type="checkbox"/> FedEx <input type="checkbox"/> UPS <input type="checkbox"/> Courier <input type="checkbox"/> Other	
Client Sample Name T970 SVC Influent 7761V 7761G		Influent 7761V 7761G		Sampling Time 0900		Container Type/Qty 6/12/11		LAB USE ONLY Temperature °C Thermometer ID Initials Returned Eqmt Total cans: Unused cans: Flow Controllers:	
Client Notes/Special Instructions: note 8467 f s bag TAT									
Relinquished By Print: Robert Nischay Signature: <i>[Signature]</i>		Date 7/9/25 Time: 11:00		Received By Print: <i>[Signature]</i> Signature: <i>[Signature]</i>		Date 7/9/25 Time: 11:20		EDD? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Relinquished By Print: Signature:		Date Time		Received By Print: Signature:		Date Time		EDD? <input type="checkbox"/> Yes <input type="checkbox"/> No	



**Analytical Report**

12/12/2025  
Mr. Robert A. Niehay II  
TRC Companies, Inc.  
505 E. Huntland Dr.  
Suite 250  
Austin TX 78752

Project Name: T970 SVE System O&M  
Project #: 639242.0000.0000 Ph 5  
Workorder #: 2511511A

Dear Mr. Robert A. Niehay II

The following report includes the data for the above referenced project for sample(s) received on 11/25/2025 at Eurofins Air Toxics LLC.

The data and associated QC analyzed by Modified TO-15 (5&20 ppbv) are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Eurofins Air Toxics LLC. for your air analysis needs. Eurofins Air Toxics Inc. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Brian Whittaker at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

A handwritten signature in black ink that reads "Brian Whittaker". The signature is written in a cursive style.

Brian Whittaker  
Project Manager



Air Toxics

**WORK ORDER #: 2511511A**

Work Order Summary

<b>CLIENT:</b>	Mr. Robert A. Niehay II TRC Companies, Inc. 505 E. Huntland Dr. Suite 250 Austin, TX 78752	<b>BILL TO:</b>	Accounts Payable/Windsor TRC Companies, Inc. 21 Griffin Rd North Windsor, CT 06095
<b>PHONE:</b>	915-222-1322	<b>P.O. #</b>	231496
<b>FAX:</b>	432-201-5238	<b>PROJECT #</b>	639242.0000.0000 Ph 5 T970 SVE
<b>DATE RECEIVED:</b>	11/25/2025	<b>CONTACT:</b>	System O&M Brian Whittaker
<b>DATE COMPLETED:</b>	12/12/2025		

<u>FRACTION #</u>	<u>NAME</u>	<u>TEST</u>	<u>RECEIPT VAC./PRES.</u>	<u>FINAL PRESSURE</u>
01A	Influent-11-24-25	Modified TO-15 (5&20 ppbv	Tedlar Bag	Tedlar Bag
02A	Effluent-11-24-25	Modified TO-15 (5&20 ppbv	Tedlar Bag	Tedlar Bag
03A	Lab Blank	Modified TO-15 (5&20 ppbv	NA	NA
04A	CCV	Modified TO-15 (5&20 ppbv	NA	NA
05A	LCS	Modified TO-15 (5&20 ppbv	NA	NA
05AA	LCSD	Modified TO-15 (5&20 ppbv	NA	NA

CERTIFIED BY:   
 Technical Director

DATE: 12/12/25

Cert. No.: AZ Licensure-AZ0775, FL NELAP-E87680, LA NELAP-02089, MN NELAP-2836569, NH NELAP-209224-A, NJ NELAP-CA016, NY NELAP-11291, TX NELAP-T104704434, UT NELAP-CA009332023-16, VA NELAP-13180, WA NELAP-C935  
 Name of Accreditation Body: NELAP/ORELAP (Oregon Environmental Laboratory Accreditation Program) CA300005-21  
 Eurofins Environment Testing Northern California, LLC certifies that the test results contained in this report meet all requirements of the 2016 TNI Standard.

*This report shall not be reproduced, except in full, without the written approval of Eurofins Air Toxics, LLC.*  
 180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630  
 (916) 985-1000



**LABORATORY NARRATIVE**  
**EPA Method TO-15 Soil Gas**  
**TRC Companies, Inc.**  
**Workorder# 2511511A**

Two 1 Liter Tedlar Bag samples were received on November 25, 2025. The laboratory performed analysis via EPA Method TO-15 using GC/MS in the full scan mode. The method involves concentrating up to 50 mLs of air. The concentrated aliquot is then flash vaporized and swept through a water management system to remove water vapor. Following dehumidification, the sample passes directly into the GC/MS for analysis.

**Receiving Notes**

The Chain of Custody (COC) information for sample Effluent-11-24-25 did not match the entry on the sample tag with regard to sample identification. The information on the sample tag was used to process and report the sample.

The Chain of Custody was missing method assignment in the 'Requested Analyses' checkboxes for the associated samples. The laboratory proceeded with the analysis as per the original contract or verbal agreement.

**Analytical Notes**

Method TO-15 is validated for samples collected in specially treated canisters. As such, the use of Tedlar bags for sample collection is outside the scope of the method and not recommended for ambient or indoor air samples. It is the responsibility of the data user to determine the usability of TO-15 results generated from Tedlar bags.

Samples Influent-11-24-25 and Effluent-11-24-25 were transferred from Tedlar bags into summa canisters to extend the hold time from 72 hours to 30 days. Canister pressurization resulted in a dilution factor which was applied to all analytical results.

Dilution was performed on sample Influent-11-24-25 due to the presence of high level non-target species.

**Definition of Data Qualifying Flags**

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

J - Estimated value.

E - Exceeds instrument calibration range.

S - Saturated peak.

Q - Exceeds quality control limits.

U - Compound analyzed for but not detected above the reporting limit, LOD, or MDL value. See data page for project specific U-flag definition.

UJ- Non-detected compound associated with low bias in the CCV

N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:



a-File was requantified  
b-File was quantified by a second column and detector  
r1-File was requantified for the purpose of reissue



Air Toxics

### Summary of Detected Compounds EPA METHOD TO-15 GC/MS

Client Sample ID: Influent-11-24-25

Lab ID#: 2511511A-01A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Benzene	630	37000	2000	120000
Toluene	630	30000	2400	110000
Ethyl Benzene	630	20000	2700	86000
m,p-Xylene	630	22000	2700	98000
o-Xylene	630	4800	2700	21000

Client Sample ID: Effluent-11-24-25

Lab ID#: 2511511A-02A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Benzene	12	91	40	290
Toluene	12	44	47	170
Ethyl Benzene	12	21	54	90
m,p-Xylene	12	27	54	120



Air Toxics

Client Sample ID: Influent-11-24-25

Lab ID#: 2511511A-01A

EPA METHOD TO-15 GC/MS

File Name:	2120814	Date of Collection:	11/24/25 10:45:00 A
Dil. Factor:	126	Date of Analysis:	12/8/25 07:00 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Benzene	630	37000	2000	120000
Toluene	630	30000	2400	110000
Ethyl Benzene	630	20000	2700	86000
m,p-Xylene	630	22000	2700	98000
o-Xylene	630	4800	2700	21000

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	121	70-130
Toluene-d8	104	70-130
4-Bromofluorobenzene	105	70-130



Air Toxics

Client Sample ID: Effluent-11-24-25

Lab ID#: 2511511A-02A

EPA METHOD TO-15 GC/MS

File Name:	2120817	Date of Collection:	11/24/25 10:55:00 A
Dil. Factor:	2.51	Date of Analysis:	12/9/25 08:54 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Benzene	12	91	40	290
Toluene	12	44	47	170
Ethyl Benzene	12	21	54	90
m,p-Xylene	12	27	54	120
o-Xylene	12	Not Detected	54	Not Detected

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	116	70-130
Toluene-d8	100	70-130
4-Bromofluorobenzene	103	70-130



Air Toxics

Client Sample ID: Lab Blank

Lab ID#: 2511511A-03A

EPA METHOD TO-15 GC/MS

File Name:	2120806c	Date of Collection:	NA
Dil. Factor:	1.00	Date of Analysis:	12/8/25 01:38 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (ug/m3)	Amount (ug/m3)
Benzene	5.0	Not Detected	16	Not Detected
Toluene	5.0	Not Detected	19	Not Detected
Ethyl Benzene	5.0	Not Detected	22	Not Detected
m,p-Xylene	5.0	Not Detected	22	Not Detected
o-Xylene	5.0	Not Detected	22	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	104	70-130
Toluene-d8	98	70-130
4-Bromofluorobenzene	99	70-130



Air Toxics

Client Sample ID: CCV

Lab ID#: 2511511A-04A

EPA METHOD TO-15 GC/MS

File Name:	2120803	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 12/8/25 12:02 PM

Compound	%Recovery
Benzene	94
Toluene	99
Ethyl Benzene	96
m,p-Xylene	98
o-Xylene	100

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	117	70-130
Toluene-d8	101	70-130
4-Bromofluorobenzene	109	70-130



Air Toxics

Client Sample ID: LCS

Lab ID#: 2511511A-05A

EPA METHOD TO-15 GC/MS

File Name:	2120804	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 12/8/25 12:34 PM

Compound	%Recovery	Method Limits
Benzene	88	70-130
Toluene	88	70-130
Ethyl Benzene	86	70-130
m,p-Xylene	88	70-130
o-Xylene	87	70-130

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	109	70-130
Toluene-d8	101	70-130
4-Bromofluorobenzene	104	70-130



Air Toxics

Client Sample ID: LCSD  
 Lab ID#: 2511511A-05AA  
 EPA METHOD TO-15 GC/MS

File Name:	2120805	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 12/8/25 01:06 PM

Compound	%Recovery	Method Limits
Benzene	89	70-130
Toluene	89	70-130
Ethyl Benzene	88	70-130
m,p-Xylene	87	70-130
o-Xylene	88	70-130

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	105	70-130
Toluene-d8	101	70-130
4-Bromofluorobenzene	103	70-130

**Method : TO-15 (5&20 ppbv) (Sh)-BTEX only**

<b>CAS Number</b>	<b>Compound</b>	<b>Rpt. Limit (ppbv)</b>
71-43-2	Benzene	5.0
108-88-3	Toluene	5.0
100-41-4	Ethyl Benzene	5.0
108-38-3	m,p-Xylene	5.0
95-47-6	o-Xylene	5.0

	<b>Surrogate</b>	<b>Method Limits</b>
17060-07-0	1,2-Dichloroethane-d4	70-130
2037-26-5	Toluene-d8	70-130
460-00-4	4-Bromofluorobenzene	70-130



**Analytical Report**

12/4/2025  
Mr. Robert A. Niehay II  
TRC Companies, Inc.  
505 E. Huntland Dr.  
Suite 250  
Austin TX 78752

Project Name: T970 SVE System O&M  
Project #: 639242.0000.0000 Ph 5  
Workorder #: 2511511B

Dear Mr. Robert A. Niehay II

The following report includes the data for the above referenced project for sample(s) received on 11/25/2025 at Eurofins Air Toxics LLC.

The data and associated QC analyzed by Modified TO-3 are compliant with the project requirements or laboratory criteria with the exception of the deviations noted in the attached case narrative.

Thank you for choosing Eurofins Air Toxics LLC. for your air analysis needs. Eurofins Air Toxics Inc. is committed to providing accurate data of the highest quality. Please feel free to contact the Project Manager: Brian Whittaker at 916-985-1000 if you have any questions regarding the data in this report.

Regards,

A handwritten signature in black ink that reads "Brian Whittaker". The signature is written in a cursive, flowing style.

Brian Whittaker  
Project Manager



Air Toxics

**WORK ORDER #: 2511511B**

Work Order Summary

<b>CLIENT:</b>	Mr. Robert A. Niehay II TRC Companies, Inc. 505 E. Huntland Dr. Suite 250 Austin, TX 78752	<b>BILL TO:</b>	Accounts Payable/Windsor TRC Companies, Inc. 21 Griffin Rd North Windsor, CT 06095
<b>PHONE:</b>	915-222-1322	<b>P.O. #</b>	231496
<b>FAX:</b>	432-201-5238	<b>PROJECT #</b>	639242.0000.0000 Ph 5 T970 SVE
<b>DATE RECEIVED:</b>	11/25/2025	<b>CONTACT:</b>	System O&M Brian Whittaker
<b>DATE COMPLETED:</b>	12/04/2025		

<u>FRACTION #</u>	<u>NAME</u>	<u>TEST</u>	<u>RECEIPT VAC./PRES.</u>	<u>FINAL PRESSURE</u>
01A	Influent-11-24-25	Modified TO-3	Tedlar Bag	Tedlar Bag
02A	Effluent-11-24-25	Modified TO-3	Tedlar Bag	Tedlar Bag
03A	Lab Blank	Modified TO-3	NA	NA
04A	CCV	Modified TO-3	NA	NA
05A	LCS	Modified TO-3	NA	NA
05AA	LCSD	Modified TO-3	NA	NA

CERTIFIED BY:   
 Technical Director

DATE: 12/04/25

Cert. No.: AZ Licensure-AZ0775, FL NELAP-E87680, LA NELAP-02089, MN NELAP-2836569, NH NELAP-209224-A, NJ NELAP-CA016, NY NELAP-11291, TX NELAP-T104704434, UT NELAP-CA009332023-16, VA NELAP-13180, WA NELAP-C935  
 Name of Accreditation Body: NELAP/ORELAP (Oregon Environmental Laboratory Accreditation Program) CA300005-21  
 Eurofins Environment Testing Northern California, LLC certifies that the test results contained in this report meet all requirements of the 2016 TNI Standard.

*This report shall not be reproduced, except in full, without the written approval of Eurofins Air Toxics, LLC.*

180 BLUE RAVINE ROAD, SUITE B FOLSOM, CA - 95630  
 (916) 985-1000



**LABORATORY NARRATIVE**  
**Modified TO-3**  
**TRC Companies, Inc.**  
**Workorder# 2511511B**

Two 1 Liter Tedlar Bag samples were received on November 25, 2025. The laboratory performed analysis for volatile organic compounds in air via modified EPA Method TO-3 using gas chromatography with flame ionization detection. The TPH results are calculated using the response of Gasoline. A molecular weight of 100 is used to convert the TPH ppmv result to ug/L. The method involves concentrating up to 200 mL of sample. The concentrated aliquot is then dry purged to remove water vapor prior to entering the chromatographic system.

Method modifications taken to run these samples are summarized in the table below. Specific project requirements may over-ride the ATL modifications.

<i>Requirement</i>	<i>TO-3</i>	<i>ATL Modifications</i>
Daily Calibration Standard Frequency	Prior to sample analysis and every 4 - 6 hrs	Prior to sample analysis and after the analytical batch $\leq$ 20 samples.
Initial Calibration Calculation	4-point calibration using a linear regression model	5-point calibration using average Response Factor
Initial Calibration Frequency	Weekly	When daily calibration standard recovery is outside 75 - 125 %, or upon significant changes to procedure or instrumentation
Moisture Control	Nafion system	Sorbent system
Minimum Detection Limit (MDL)	Calculated using the equation $DL = A + 3.3S$ , where A is intercept of calibration line and S is the standard deviation of at least 3 reps of low level standard	40 CFR Pt. 136 App. B
Preparation of Standards	Levels achieved through dilution of gas mixture	Levels achieved through loading various volumes of the gas mixture

**Receiving Notes**

The Chain of Custody (COC) information for sample Effluent-11-24-25 did not match the entry on the sample tag with regard to sample identification. The information on the sample tag was used to process and report the sample.

The Chain of Custody was missing method assignment in the 'Requested Analyses' checkboxes for the associated samples. The laboratory proceeded with the analysis as per the original contract or verbal agreement.

**Analytical Notes**

There were no analytical discrepancies.

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### **Definition of Data Qualifying Flags**

Seven qualifiers may have been used on the data analysis sheets and indicate as follows:

- B - Compound present in laboratory blank greater than reporting limit.
- J - Estimated value.
- E - Exceeds instrument calibration range.
- S - Saturated peak.
- Q - Exceeds quality control limits.
- U - Compound analyzed for but not detected above the detection limit.
- M - Reported value may be biased due to apparent matrix interferences.

File extensions may have been used on the data analysis sheets and indicates as follows:

- a-File was requantified
- b-File was quantified by a second column and detector
- r1-File was requantified for the purpose of reissue



Air Toxics

### Summary of Detected Compounds MODIFIED EPA METHOD TO-3 GC/FID

Client Sample ID: Influent-11-24-25

Lab ID#: 2511511B-01A

Compound	Rpt. Limit (ppmv)	Rpt. Limit (ug/L)	Amount (ppmv)	Amount (ug/L)
TPH (Gasoline Range)	5.0	20	3200	13000

Client Sample ID: Effluent-11-24-25

Lab ID#: 2511511B-02A

Compound	Rpt. Limit (ppmv)	Rpt. Limit (ug/L)	Amount (ppmv)	Amount (ug/L)
TPH (Gasoline Range)	0.025	0.10	6.7	27



Air Toxics

Client Sample ID: Influent-11-24-25

Lab ID#: 2511511B-01A

**MODIFIED EPA METHOD TO-3 GC/FID**

<b>File Name:</b>	d112607	<b>Date of Collection:</b> 11/24/25 10:45:00 A
<b>Dil. Factor:</b>	200	<b>Date of Analysis:</b> 11/26/25 10:51 AM

Compound	Rpt. Limit (ppmv)	Rpt. Limit (ug/L)	Amount (ppmv)	Amount (ug/L)
TPH (Gasoline Range)	5.0	20	3200	13000

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
Fluorobenzene (FID)	115	75-150



Air Toxics

Client Sample ID: Effluent-11-24-25

Lab ID#: 2511511B-02A

**MODIFIED EPA METHOD TO-3 GC/FID**

<b>File Name:</b>	d112606	<b>Date of Collection:</b> 11/24/25 10:55:00 A
<b>Dil. Factor:</b>	1.00	<b>Date of Analysis:</b> 11/26/25 10:09 AM

Compound	Rpt. Limit (ppmv)	Rpt. Limit (ug/L)	Amount (ppmv)	Amount (ug/L)
TPH (Gasoline Range)	0.025	0.10	6.7	27

Container Type: 1 Liter Tedlar Bag

Surrogates	%Recovery	Method Limits
Fluorobenzene (FID)	118	75-150



Air Toxics

Client Sample ID: Lab Blank

Lab ID#: 2511511B-03A

**MODIFIED EPA METHOD TO-3 GC/FID**

<b>File Name:</b>	<b>d112605</b>	<b>Date of Collection:</b>	<b>NA</b>	
<b>Dil. Factor:</b>	<b>1.00</b>	<b>Date of Analysis:</b>	<b>11/26/25 09:17 AM</b>	

<b>Compound</b>	<b>Rpt. Limit (ppmv)</b>	<b>Rpt. Limit (ug/L)</b>	<b>Amount (ppmv)</b>	<b>Amount (ug/L)</b>
TPH (Gasoline Range)	0.025	0.10	Not Detected	Not Detected

Container Type: NA - Not Applicable

<b>Surrogates</b>	<b>%Recovery</b>	<b>Method Limits</b>
Fluorobenzene (FID)	103	75-150



Air Toxics

Client Sample ID: CCV

Lab ID#: 2511511B-04A

MODIFIED EPA METHOD TO-3 GC/FID

File Name:	d112601	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 11/26/25 06:41 AM

Compound	%Recovery
TPH (Gasoline Range)	105

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Fluorobenzene (FID)	112	75-150



Air Toxics

Client Sample ID: LCS

Lab ID#: 2511511B-05A

MODIFIED EPA METHOD TO-3 GC/FID

File Name:	d112602	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 11/26/25 07:21 AM

Compound	%Recovery	Method Limits
TPH (Gasoline Range)	88	75-125

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
Fluorobenzene (FID)	120	75-150



Air Toxics

Client Sample ID: LCSD

Lab ID#: 2511511B-05AA

**MODIFIED EPA METHOD TO-3 GC/FID**

<b>File Name:</b>	<b>d112603</b>	<b>Date of Collection:</b> NA
<b>Dil. Factor:</b>	<b>1.00</b>	<b>Date of Analysis:</b> 11/26/25 07:55 AM

<b>Compound</b>	<b>%Recovery</b>	<b>Method Limits</b>
TPH (Gasoline Range)	94	75-125

Container Type: NA - Not Applicable

<b>Surrogates</b>	<b>%Recovery</b>	<b>Method Limits</b>
Fluorobenzene (FID)	123	75-150



Analytical Data Review Checklist

<b>Site:</b> Tank 970 - Artesia Station West <b>Location:</b> Eddy County, New Mexico <b>Client Name:</b> HEP <b>Project #:</b> 705860		<b>Laboratory:</b> Eurofins Air Toxics - Folsom, CA <b>Lab Report #s:</b> 2511511A and 2511511B <b>Reviewer:</b> Nancy Bergstrom <b>Peer Reviewer:</b> Jessica Esser <b>Review Date:</b> 2/6/2026	
<b>Analytical Method(s):</b> -Total Benzene, Toluene, Ethylbenzene, Xylenes (BTEX) with Benzene, Toluene, Ethylbenzene, m,p-Xylenes and o-Xylene by EPA Method TO-15 -Total Petroleum Hydrocarbons (TPH) Gasoline Range by EPA Method TO-3		<b>Matrices Sampled:</b> Soil Vapor Samples	<b>Sample Collection Date(s):</b> 11/24/2025
<b>Sampling Objective(s):</b> Estimate hydrocarbon recovery rates and cumulative hydrocarbon recovery.			
<b>Sample IDs (List IDs or attach COC):</b> 2511511A and 2511511B: Influent-11-24-25, Effluent-11-24-25			

Review Item or Question		Yes	No	NA	Comments
<b>Chain-of-Custody and Data Completeness</b>					
1	Was COC appropriately completed?		X		The COC was missing method assignment in the "Requested Analyses" checkboxes for the samples submitted. The laboratory proceeded with analyses as per the original contract and/or verbal agreement.
2	Did the laboratory report correct sample IDs?	X			The sample ID on the COC for the effluent sample was Effluent-11-24-20. The laboratory noted this sample ID did not match the entry on the sample tags attached to the sample containers. The laboratory used the sample ID of Effluent-11-24-25 to process and report the sample.
3	Do the laboratory reported sample collection dates and times agree with the COC forms?	X			
4	Are results reported for all analytical methods requested?	X			
5	Are results reported for all samples submitted for analysis?	X			
6	Were the requested analytical methods used?	X			
7	Are results reported for all target analytes, but no additional analytes?	X			
8	<b>SOIL/SEDIMENT ONLY:</b> Were soil/sediment results reported on a dry weight basis?			X	
9	If requested, were detected results below reporting limit (i.e., "J" values) reported?		X		Results were reported by the laboratory to the reporting limit (RL).
10	Did we receive the required deliverables (e.g., EDD, Level 4 data, laboratory certification, etc.) in the correct formats?	X			



Analytical Data Review Checklist

Review Item or Question	Yes	No	NA	Comments
<b>Sample Preservation</b>				
11a			X	
11b			X	
11c			X	
11d			X	
12	X			
13		X		
14a			X	Tedlar bags were used for sample collection for both TO-15 and TO-3 analysis.
14b			X	
<b>Holding Times</b>				
15	X			The laboratory noted samples Influent-11-24-25 and Effluent-11-24-25 were transferred from Tedlar bags into summa canisters to extend the holding time for the TO-15 analyses from 3 days to 30 days.
<b>Reporting Limits</b>				
16	X			
17	X			Influent-11-24-25: BTEX (TO-15) : 126-fold, TPH (TO-3): 200-fold Effluent-11-24-25: BTEX (TO-15): 2.51-fold
18	X			Sample Influent-11-24-25 was diluted for TO-15 analysis due to canister pressurization when transferring from the Tedlar bag to a summa canister and due to the presence of high levels of target analytes.  Sample Influent-11-24-25 was diluted for TO-3 analysis due to the presence of high levels of target analytes.  Sample Effluent-11-24-25 was diluted for TO-15 analysis due to canister pressurization when transferring from the Tedlar bag to a summa canister.
<b>QC Results</b>				
<b>Blanks</b>				
19		X		
20	X			
21			X	
22		X		
<b>Laboratory Control Spikes</b>				
23	X			
24	X			
25			X	LCS/LCSD RPDs were not calculated and reported by the laboratory. Calculations performed during validation indicated the RPDs were within typical guidance limits (i.e., 20%).



Analytical Data Review Checklist

Review Item or Question	Yes	No	NA	Comments
<b>Matrix Spikes</b>				
26			X	Are MS/MSD recoveries within QC limits? If no, list analytes affected, the MS/MSD recoveries and the sample that was spiked.
27			X	Are MS/MSD RPDs within QC limits? If no, list analytes affected, the RPDs and the sample that was spiked.
<b>Surrogates</b>				
28	X			<b>ORGANIC ANALYSES ONLY:</b> Are surrogate recoveries within QC limits? If no, list samples, surrogate recoveries and analytes affected.
<b>Duplicates</b>				
29			X	Are laboratory duplicate RPDs within QC limits? If no, list analytes affected, the RPDs and the sample that was prepared/analyzed in duplicate.
30			X	Were field duplicate criteria met? Refer to RPD and/or Tips tabs for typical criteria. If no, list analytes affected, the RPD and/or absolute difference (as applicable), and the associated samples.



Analytical Data Review Checklist

Review Item or Question	Yes	No	NA	Comments
<b>Do the Data Make Sense?</b>				
31		X		Tedlar bags were used for sample collection for TO-15 analysis. Method TO-15 is validated for samples collected in specially treated canisters. The use of Tedlar bags for sample collection is outside the scope of Method TO-15. <b>Therefore, the positive results for all BTEX analytes in sample Influent-11-24-25 were qualified as estimated (J) and the positive and nondetect results for all BTEX analytes in sample Effluent-11-24-25 were qualified as estimated (J/UJ).</b>
32		X		
33		X		
34	X			
<b>Additional Comments:</b>				
The table attachment summarizes the validation qualifiers.				

**Notes:**  
 The EPA Superfund Contract Laboratory Program (CLP) National Functional Guidelines (NFGs) for Data Review (November, 2020) or most recent version found here:  
<https://www.epa.gov/clp/superfund-clp-national-functional-guidelines-data-review>

- Abbreviations:**
- BTEX Benzene, Toluene, Ethylbenzene, Xylenes
  - COC Chain-of-Custody
  - EDD Electronic Data Deliverable
  - LCS/LCSD Laboratory Control Sample / Laboratory Control Sample Duplicate
  - MS/MSD Matrix Spike / Matrix Spike Duplicate
  - QAPP Quality Assurance Project Plan
  - QC Quality Control
  - %R Percent Recovery
  - RL Reporting Limit
  - RPD Relative Percent Difference
  - TPH Total Petroleum Hydrocarbons
  - VOC Volatile Organic Compound

## Table of Qualified Analytical Results

Sample ID	Lab ID	Method	Diln	Compound/Analyte	Concentration	Qualifier	Reason Code(s)
<b>Lab Report 2511511A:</b>							
Influent-11-24-25	2511511A-01A	TO-15	126	Benzene	37,000 ppbv	J	QC
Influent-11-24-25	2511511A-01A	TO-15	126	Toluene	30,000 ppbv	J	QC
Influent-11-24-25	2511511A-01A	TO-15	126	Ethyl Benzene	20,000 ppbv	J	QC
Influent-11-24-25	2511511A-01A	TO-15	126	m,p-Xylene	22,000 ppbv	J	QC
Influent-11-24-25	2511511A-01A	TO-15	126	o-Xylene	4,800 ppbv	J	QC
Effluent-11-24-25	2511511A-02A	TO-15	2.51	Benzene	91 ppbv	J	QC
Effluent-11-24-25	2511511A-02A	TO-15	2.51	Toluene	44 ppbv	J	QC
Effluent-11-24-25	2511511A-02A	TO-15	2.51	Ethyl Benzene	21 ppbv	J	QC
Effluent-11-24-25	2511511A-02A	TO-15	2.51	m,p-Xylene	27 ppbv	J	QC
Effluent-11-24-25	2511511A-02A	TO-15	2.51	o-Xylene	< 12 ppbv	UJ	QC

Please note that only the ppbv concentrations are listed in this table. Qualification is also applicable to the results reported in units of ug/m<sup>3</sup>.

**Qualifier Definitions:**

J detected result, estimated concentration  
 UJ nondetect result, estimated reporting limit

**Reason Code Definitions:**

QC results qualified due to sample collection outside the scope of the method

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 569697

**CONDITIONS**

Operator: HOLLY ENERGY PARTNERS - OPERATING, LP 1602 W. Main St. Artesia, NM 88210	OGRID: 282505
	Action Number: 569697
	Action Type: [REPORT] Alternative Remediation Report (C-141AR)

**CONDITIONS**

Created By	Condition	Condition Date
rhamlet	The 2025 Operation and Maintenance Annual Report will be accepted for record and placed in the incident file. Please continue to implement and operate the full-scale SVE system during calendar year 2026 for the deeper crude oil affected soil impacts. Continue to evaluate the system effectiveness and efficiency. Please contact the OCD if you have any additional questions or concerns.	4/30/2026