State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Lease No. N/A

Release Notification and Corrective Action

al Report	X	🛛 Initial Report	OPERATOR 🛛	
		er of EHS)	ontact Dickie Townley (Manager o	Name of Company Holly Energy Partners - Operating, L.P.
			elephone No. 575-748-8949	Address P.O. Box 1260, Artesia, NM 88211-1260
		/ Pig Station	acility Type Crude Oil Manifold / Pi	Facility Name Section 35 Station
	<u></u>	/ Pig Station	acility Type Crude Oil Manifold / Pi	Facility Name Section 35 Station

Surface Owner State of New Mexico Mineral Owner State of New Mexico

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	35	19S	37E					

Latitude <u>32.619791</u> Longitude <u>-103.227688</u>

NATURE OF RELEASE

Type of Rolease Crude Oil	Volume of Release 5 bbls	Volume Recovered 0			
Source of Release Under ground Pipeline	Date and Hour of Occurrence	Date and Hour of Discovery 12/28/2009			
Was Immediate Notice Given?	12/28/2009 @ ??? If YES, To Whom?	@ 12:30 PM			
Yes □ No □ Not Required		6)			
By Whom? Dickie Townley	Date and Hour 12/28/2009 @ 3:3	3 PM (upon confirmation)			
Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.				
If a Watercourse was Impacted, Describe Fully.*		· ·			
		·			
Describe Cause of Problem and Remedial Action Taken.* An inactive underground crude oil pipeline leaked due to internal corrosic removed and replaced with clean soil. (There may be areas of contamina out.)					
Describe Area Affected and Cleanup Action Taken.*	······································	<u>مەمىيە بەر بەر بەر بەر بەر بەر بەر بەر بەر بە</u>			
The release occurred near the center of the site and affected an area appre	ximately 3-4 feet wide by 100 feet lo	ng.			
I hereby certify that the information given above is true and complete to tregulations all operators are required to report and/or file certain release n public health or the environment. The acceptance of a C-141 report by th should their operations have failed to adequately investigate and remediat or the environment. In addition, NMOCD acceptance of a C-141 report d federal, state, or local laws and/or regulations.	otifications and perform corrective ac e NMOCD marked as "Final Report" e contamination that pose a threat to a	tions for releases which may endanger does not relieve the operator of liability ground water, surface water, human health			
$\Lambda \cdot I \supset \Lambda$	OIL CONSERV	VATION DIVISION			
Signature: Nickie Southlen					
	ENV. ENGLIN ERR Approved by District Supervisor:				
Printed Name: Dickie Townley		Sterffaction			
Title: Manager of EHS	Approval Date: 02/01/2011	Expiration Date: -			
E-mail Address: Dickie.townley@hollyenergy.com	Conditions of Approval:	Attached			
Date: 12/29/2009 Phone: 575-748-8949		1RP-02-11-2678			

* Attach Additional Sheets If Necessary

Holly Energy Partners Monument Section 35 Section 35, Township 19S, Range 37E Lea County, New Mexico

Closure Report

May 5, 2010



Prepared for:

Holly Energy Partners P.O. Box 1260 Artesia, New Mexico 88211

Prepared by:

Safety & Environmental Solutions, Inc. 703 East Clinton Street Hobbs, New Mexico 88240 (575) 397-0510

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I. Company Contacts

Representative	Company	Telephone	E-mail Address
Nora Vazquez	Holly Energy Partners	575-746-5475	Nora.Vazquez@hollyenergy.com
Bob Allen	SESI	575-397-0510	ballen@sesi-nm.com

II. Background

Safety & Environmental Solutions, Inc. (SESI) was contracted by Holly Energy Partners to perform assessment and cleanup services on an area identified as the Monument Section 35. The subject site is in Section 35, Township 19 South, Range 37 East, in Lea County, New Mexico.

III. Contaminant and Size of Area

The suspected contaminate is crude oil from a dead flow line in the area. Approximately five (5) barrels were released. The size of the impacted area is approximately 1,720 sq. ft. No evidence of other contaminants was observed.

IV. Surface and Ground Water

According to the database provided by the United States Geological Survey (USGS) the closest groundwater of record is in the same section, range, and township. The depth in this well is twenty-three (23) feet. The measurement was taken in March 1996. On March 2, 2010 SESI installed a temporary monitor well to determine depth of water. The depth to water was measured at thirty-six and a half (36.5) feet.

V. Soils

The soils in the area are predominantly sand and sandy loam.

VI. Characterization

The target cleanup levels are reached by the application of the "Guidelines for Remediation of Leaks, Spills and Releases New Mexico Oil Conservation Division (NMOCD) – August 13, 1993 to this site is 100 parts per million (ppm) Total Petroleum Hydrocarbons (TPH).

Application of the New Mexico Oil Conservation Division's ranking criteria for contaminated soils at this site is presented below:

Depth to Ground Water:				
(Vertical distance from contaminants	to	Less than 50 feet	20 points	X
seasonal high water elevation	of	50 feet to 99 feet	10 points	
groundwater)		>100 feet	0 points	
Wellhead Protection Area:				
(Less than 200 feet from a private domes	stic	Yes	20 points	
water source; or less than 1000 feet from	ali	No	0 points	X
other water sources)				

Distance to Surface Water:			
(Horizontal distance to perennial lakes,	Less than 200 feet	20 points	
ponds, rivers, streams, creeks, irrigation	200 feet to 1000 feet	10 points	
canals and ditches)	>1000 feet	0 points	X
RANKING SCORE (TOTAL POINTS)			

VII. Work Performed

On December 28, 2009, Safety and Environmental Solutions, Inc. was onsite to excavate release area from pipeline leak. The contaminated area was excavated between depths of five (5) feet and sixteen (16) feet below grade level (bgl). Approximately 940 yards of contaminated soils were excavated and transported to Controlled Recovery Inc. (CRI) disposal facility.

On January 6, 2010 through January 22, 2010, Safety and Environmental Solutions, Inc. obtained samples from the excavated area. Samples were transported to Cardinal Laboratories in Hobbs, NM to be analyzed for Benzene, Toluene, Ethyl Benzene, and Total Xylenes (BTEX) (EPA Method 8260 B) and Total Petroleum Hydrocarbons (TPH) (EPA Method 418.1)

The results of the analysis are as follows:

Sample Point	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl Benzene (mg/kg)	Total Xylenes (mg/kg)	TPH (mg/kg)
#2 8'bgl	<0.005	<0.005	<0.005	<0.300	<100
#3 5 ½'bgl	<0.005	< 0.005	<0.005	<0.300	<100
#4 4'bgl	<0.005	<0.005	<0.005	<0.300	<100
#5 9'bgl	<0.005	< 0.005	<0.005	<0.300	<100
South Wall	<0.005	<0.005	<0.005	<0.300	<100
East Wall	<0.005	<0.005	<0.005	<0.300	<100

On January 26, 2010, Safety and Environmental Solutions obtained a sample from the bottom of the excavation at sixteen (16) feet below grade level. The sample was transported to Cardinal Laboratories in Hobbs, NM to be analyzed for Benzene, Toluene, Ethyl Benzene, and Total Xylenes (BTEX) (EPA Method 8260 B) and Total Petroleum Hydrocarbons (TPH) (EPA Method 418.1)

The results of the analysis are as follows:

Sample Point	Benzene	Toluene	Ethyl Benzene	Total Xylenes	GRO	DRO
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
#1 16'bgl	0.381	0.624	1.47	4.21	461	1,990

On March 3, 2010, Safety and Environmental Solutions installed a borehole southeast of excavated area. Samples were taken every five (5) feet and transported to Cardinal Laboratories in Hobbs, NM to be analyzed for Benzene, Toluene, Ethyl Benzene, and Total Xylenes (BTEX) (EPA Method 8260 B) and Total Petroleum Hydrocarbons (TPH) (EPA Method 418.1)

Sample Point	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl Benzene (mg/kg)	Total Xylenes (mg/kg)	TPH (mg/kg)
0 1 11			· · · · · · · · · · · · · · · · · · ·		
Surface #1	<0.005	<0.005	<0.005	<0.300	<100
BH #1_5'	<0.005	<0.005	<0.005	<0.300	<100
BH #1 10'	<0.005	<0.005	<0.005	<0.300	<100
BH #1 13'	<0.005	<0.005	<0.005	<0.300	<100
BH #1A 10'	<0.005	<0.005	<0.005	<0.300	<100

The results of the analysis are as follows:

Since the crude oil had migrated underneath the existing production vessels onsite, Mr. Larry Johnson, with New Mexico Oil Conservation Division (NMOCD) granted approval to only excavate the accessible areas to 100 ppm TPH and transport to Controlled Recovery Inc. (CRI) for proper disposal, as well as, any contamination under the vessels is to be left in place until location is abandoned and vessels moved.

On March 8, 2010, SESI was onsite to retrieve top of water level from monitor well. The total depth of well measured 40.45 and the top of water measured 40.20. 4.50 is the measurement from surface to top of casing. 35.95 is the depth from surface to total depth of monitor well.

On April 1, 2010, Mr. Larry Johnson with New Mexico Oil Conservation Division (NMOCD) granted approval to plug and abandon the temporary monitor well. The temporary well was plugged using seven (7) bags of bentonite to surface.

On April 26-28, 2010, SESI was onsite with D&D Construction to start backfilling excavated area and approximately 972 yards of caliche from an offsite facility was used to backfill the area and contour to its natural grade.

VIII. Conclusion

Remedial actions at this site have all been performed with the approval of, and in accordance with all NMOCD requirements.

As a result, we respectfully submit this closure report for your consideration and approval.

IX. Figures & Appendices

Figure 1 - Vicinity Map Figure 2 - Site Plan Appendix A – Analytical Results Appendix B –Site Photographs Appendix C – C-141

Figure 1 Vicinity Map

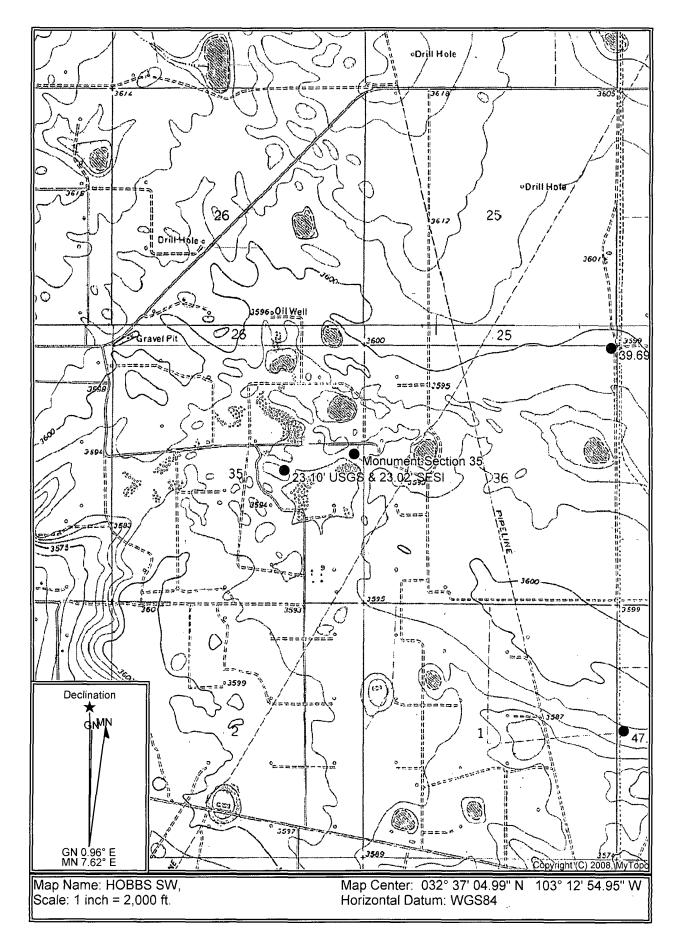
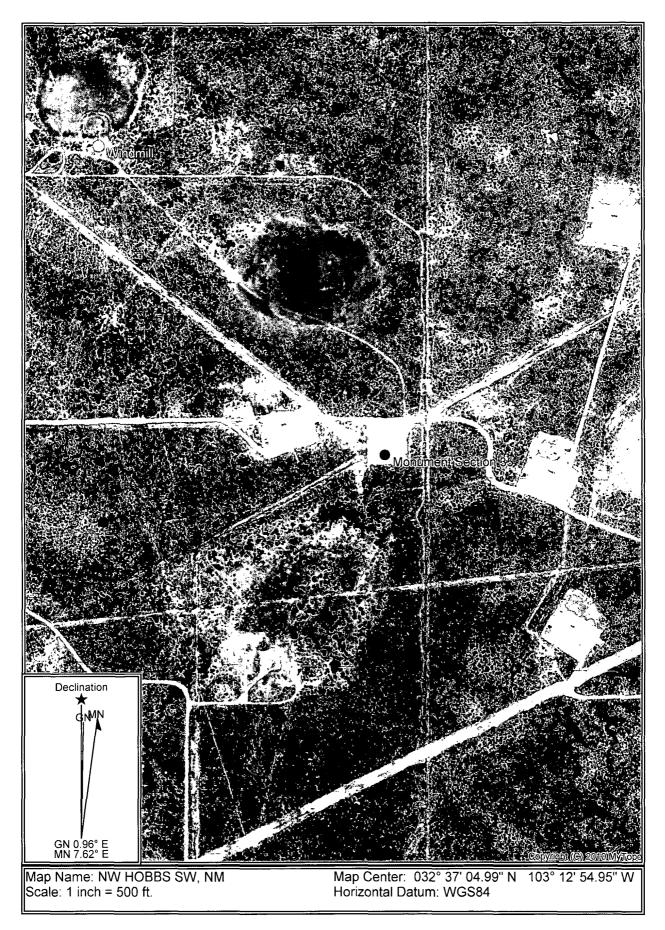


Figure 1 Vicinity Map: Monument Section 35



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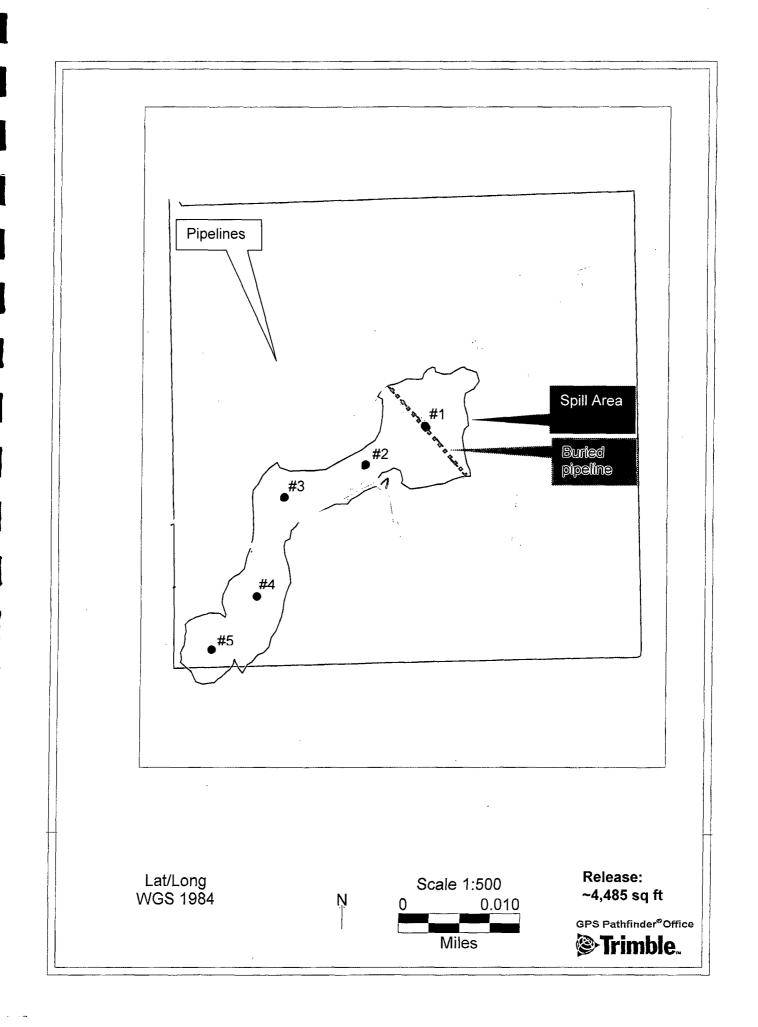
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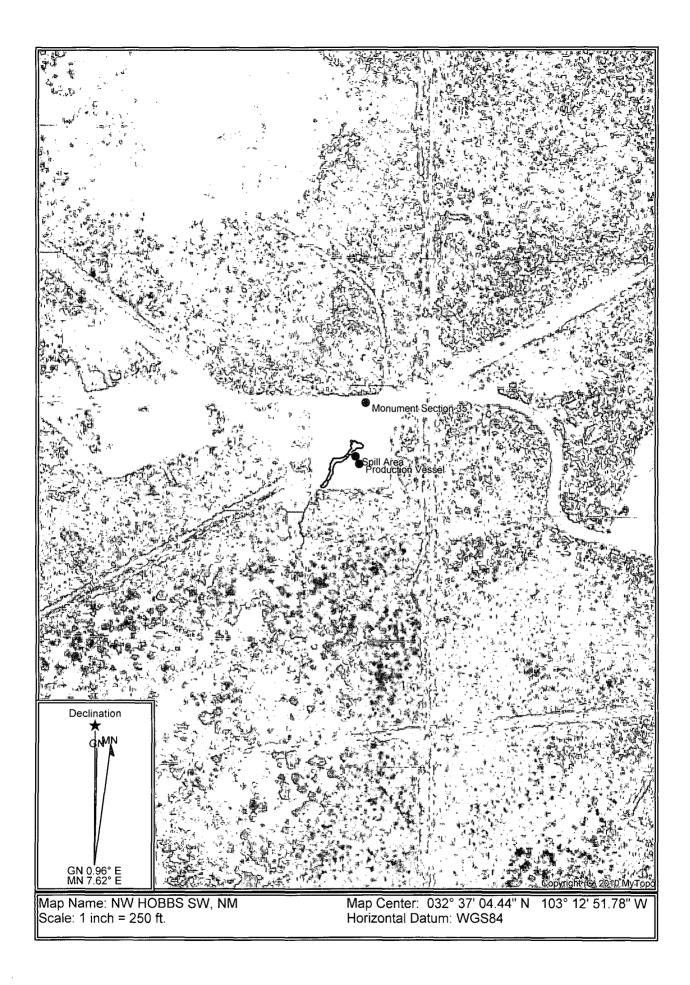
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Figure 1 Vicinity Map: Monument Section 35

Figure 2 Site Plan





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Appendix A Analytical Results



PHONE (575) 303-2326 + 101 E. MARLAND + HOBBS, NM 88240

January 8, 2010

Bob Allen Safety & Environmental Solutions, Inc. 703 East Clinton, #102 Hobbs, NM 88240

Re: Monument Section 35 (HOL-09-014)

Enclosed are the results of analyses for sample number H18995, received by the laboratory on 01/06/10 at 1:20 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Method SW-846 8260 Method TX 1005 Benzene, Toluene, Ethyl Benzene, and Total Xylenes Benzene, Toluene, Ethyl Benzene, and Total Xylenes Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited though the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Method EPA 524.2 Method EPA 524.2 Haloacetic Acids (HAA-5) Total Trihalomethanes (TTHM) Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 4 (includes Chain of Custody)

Sincerely,

Celey D. Keene

Laboratory Director

This report conforms with NELAP requirements.



ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, #102 HOBBS, NM 88240 FAX TO: (575) 393-4388

Receiving Date: 01/06/10 Reporting Date: 01/07/10 Project Number: HOLLY ENERGY (HOL-09-014) Project Name: MONUMENT SECTION 35 Project Location: LEA COUNTY, NM Sampling Date: 01/04/10 & 01/05/10 Sample Type: SOIL Sample Condition: COOL & INTACT @ 4.5⁰C Sample Received By: CK Analyzed By: ZL

LAB NO.	SAMPLE ID	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS	DATE:	01/06/10	01/06/10	01/06/10	01/06/10
H18995-1	#2.8'BGL	<0.050	<0.050	<0.050	<0.300
H18995-2	#5 9'BGL	<0.050	<0.050	<0.050	<0.300
H18995-3	#4 4'BGL	<0.050	<0.050	<0.050	<0.300
H18995-4	#3 5'6"BGL	<0.050	<0.050	<0.050	<0.300
Quality Con	trol	0.047	0.046	0.048	0.138
True Value	QC	0.050	0.050	0.050	0.150
% Recover	ý	94.0	92.0	96.0	92.0
Relative Pe	rcent Difference	2.1	2.2	2.1	2.7

METHODS: TPH GRO & DRO - EPA SW-846 8015 M; BTEX - SW-846 8021B; CI-: Std. Methods 4500-CI-B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES. Reported on wet weight.

Lab Director

H18995 BTEX SES

PLEASE NOTE Liability and Damages. Cardinal's lability and clent's exclusive remedy for any claim arising whether based in contract or tool, shall be include to the process pail by client for analyses. All claims, including table to regigered and any clear devices whatsweet shall be under some wrang and received by Cardinal wrant now (30) days after considered of the applicable service. In the event TNE' Cardinal be reply for wolderne or consequences, mounding wrant wrant on the wrang and received by Cardinal wrant wrant of the above-stated by client, by service interceptions' tops of use, or loss of profile incurred by client, its substances, whether or shall be reply client to the consequences and and and analytic or second analytic in the event of the above-stated by device. Results event only to the service interview of the above-stated to device except in for with ordinal regardless of Gerand Laboratories.



PHONE (575) 393-2326 + 101 E. MARLAND + HOBBS, NM 88240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, #102 HOBBS, NM 88240 FAX TO: (575) 393-4388

Receiving Date: 01/06/10 Reporting Date: 01/08/10 Project Owner: HOLLY ENERGY (HOL-09-014) Project Name: MONUMENT SECTION 35 Project Location: LEA COUNTY, NM

Analysis Date: 01/07/10 Sampling Date: 01/04/10 & 01/05/10 Sample Type: SOIL Sample Condition: COOL & INTACT @ 4.5°C Sample Received By: CK Analyzed By: AB

LAB NUMBER SAMPLE ID

418.1 TPH (mg/kg)

H18995-1	#2. 8' BGL	<100
H18995-2	#5. 9' BGL	<100
H18995-3	#4. 4' BGL	<100
H18995-4	#3. 5'6" BGL	<100
	· .	
Quality Contro		319
True Value Q	300	
% Recovery	106	
Relative Perce	1.0	

METHOD: EPA 418.1. Reported on wet weight. Not accredited for TPH 418.1

6 S.A.A. Chemist.

outala Date

PLEASE NOTE: Liability and Damages. Cardinal's liability and pleansy endusive remedy for any claim arising, whether based in contract or rort, shall be limited to like amount usib by client for analyset At class, policing through the period of the period of the period of the period of the tendence of tendec of tendec of tendec of tendence of tendence of t relate only to the samples identified above. This resear shall not be reproduced except is full with written approval of Calcums Laborationes.

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240

(505) 393-2326 Fax (505) 393-2	476	and the second	2 ⁻¹	Page	of
Company Name: Safety & Environmental	Solutions, Inc.	BILL TO		ANALYSIS REQUE	ST
Project Manager: Bob Allen		P.O. #:			
Address: 703 East Clinton		Company: Same			
City: Hobbs State: NM	Attn:				
Phone #: 575-397-0510 Fax #: 575	-393-4388	Address:			
Project #: HOL-09-014 Project Owne	: Holly Every	çity:			
	lou 35	State: Zip:			
Project Location: Lea Country		Phone #:			
Sampler Name: Brian Cuellar		Fax #:			
LOU (VAI) 22 CHI'A	MATRIX	PRESERV. SAMPLING			
	CC)OMP ER ER				
Lab I.D. Sample I.D.		iii z			
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Sampler Relinguilshed: Date: 1/6/10	Received By:	. Pho	one Result: □ Yes □ No (Résult: □ Yes □ No		
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+ Cardinal cannot accept verbal changes, Please fax written changes to 575-393-2476.

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PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

January 27, 2010

Bob Allen Safety & Environmental Solutions, Inc. 703 East Clinton, #102 Hobbs, NM 88240

Re: Monument Section 35 (HOL-09-014)

Enclosed are the results of analyses for sample number H19125, received by the laboratory on 01/22/10 at 1:35 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Method SW-846 8260 Method TX 1005 Benzene, Toluene, Ethyl Benzene, and Total Xylenes Benzene, Toluene, Ethyl Benzene, and Total Xylenes Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited though the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Method EPA 524.2 Method EPA 524.2 Haloacetic Acids (HAA-5) Total Trihalomethanes (TTHM) Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 4 (includes Chain of Custody)

Sincerely,

Celey D./Keene

Laboratory Director

This report conforms with NELAP requirements.



PHONE (575) 393-2326 * 101 E. MARLAND * HOBBS, NM 88240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, #102 HOBBS, NM 88240 FAX TO: (575) 393-4388

Receiving Date: 01/22/10 Reporting Date: 01/26/10 Project Owner: HOLLY ENERGY (HOL-09-014) Project Name: MONUMENT SECTION 35 Project Location: MONUMENT, NM Analysis Date: 01/26/10 Sampling Date: 01/19/10 & 01/20/10 Sample Type: SOIL Sample Condition: COOL & INTACT @ 4.5⁰C Sample Received By: JH Analyzed By: AB

LAB NUMBER SAMPLE ID

418.1 TPH (mg/kg)

H19125-1	SOUTH WALL	<100
H19125-2	EAST WALL	<100
	ad fan de fan ferste fan de ferste	1.11.11.11.11.11.11.11.11.11.11.11.11.1
Quality Control		297
True Value QC		300
% Recovery	2000 maa ka ka ka ka maana ka	99.0
Relative Percer	nt Difference	1.3

METHOD: EPA 418.1. Reported on wet weight. Not accredited for TPH 418.1

I MA Chemist

27/10

Date

PLEASE NOTE. Liability and Damages. Cardinal to society and client's exclusive remervitor any dam anone, whence based is contract or part, shall be limited to the amount paid by client for analyses. As claused that the decimate the second served unless manually and barries by Cardinal within their (30) cass after completer of the applicable server, in the event and contract or part, shall be limited to the amount paid by client for analyses, and client's considered entry of the second unless manually by Cardinal to labor to indicated or the completer of the subsidiaries server, in the event cash contract or contract or part, shall be limited to the subsidiaries server, in the event cash contract or contract or part of the second or by Cardinal to labor to contract or contract or part of the second of the subsidiaries server, in the event cash contract or con



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, #102 HOBBS, NM 88240 FAX TO: (575) 393-4388

Receiving Date: 01/22/10 Reporting Date: 01/26/10 Project Owner: HOLLY ENERGY (HOL-09-014) Project Name: MONUMENT SECTION 35 Project Location: MONUMENT, NM Sampling Date: 01/19/10 & 01/20/10 Sample Type: SOIL Sample Condition: COOL & INTACT @ 4.5⁰C Sample Received By: JH Analyzed By: ZL

LAB NO. SAMPLE ID	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS DATE:	01/25/10	01/25/10	01/25/10	01/25/10
H19125-1 SOUTH WALL	<0.050	<0.050	<0.050	<0.300
H19125-2 EAST WALL	<0.050	<0.050	<0.050	<0.300
			41-1 4	
Quality Control	0.057	0.055	0.056	0.163
True Value QC	0:050	0:050	0.050	0.150
% Recovery	114	110	112	109
Relative Percent Difference	<1.0	1.8	<1.0	<1.0

METHODS: BTEX - SW-846 8021B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES. Reported on wet weight.

Lab Director

Oltetho

Date

H19125 BTEX SESI

PLEASE NOTE: Liaofility and Damages. Cardinal's lability and client's exclusive remady for any claim ations, whether based in contract or rort, shell be braied to the analyses. All claim: including house for regardings and any other cluster without without imitation, business intercented by Cardinal writin taility (20) days after completion of the applicable senses. In the west, rise. Conditial to reade to instrument or consideration, damages, including without imitation, business, intercented by Cardinal to reade the instrument or the applicable athliates to successory reason of or tested to me performance of servers, neuronal without imitation, business of endow of the above-subted readed to be above-subted readed to be above-subted readed except in the web wither of cardinal cardinal servers in the above-subted readed to be above-subted readed except in the with without ordinal cardinal cardinal cardinal servers and the above-subted readed except in the with white when the subterview. Fracult

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST ARDINAL LABORATORIES 101 East Marland, Hobbs; NM 88240 Page___of___ (505) 393-2326 Fax (505) 393-2476 BILL TO Company Name: ANALYSIS REQUEST Safety & Environmental Solutions, Inc. Υ. Piefect Manager: Bob Allen P.O. #: Same 703 East Clinton Company: Hobbe State: NM Zip: 88240 Attn:

City:	Hobbs	State: NM	Zip:	88	3240			Au	ln:																
Phone #:	575-397-0510	Fax #: 575	-393	3-4	388			Åd	ldre	ss:									-						
Project #: HOI	1-09-014	Project Owner	: []	$\frac{1}{2}$	14			City:]														
Freject Name:	reject Namo: Mourout Section 35					Sta	alo:			Zip:															
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#26

Address:



PHONE-(575) 393-2326 * 101 E. MARLAND * HOBBS, NM 88240

February 2, 2010

Bob Allen Safety & Environmental Solutions, Inc. 703 East Clinton, #102 Hobbs, NM 88240

Re: Monument Section 35 (HOL-09-014)

Enclosed are the results of analyses for sample number H19145, received by the laboratory on 01/26/10 at 11:40 am.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Method SW-846 8260 Method TX 1005

Benzene, Toluene, Ethyl Benzene, and Total Xylenes Benzene, Toluene, Ethyl Benzene, and Total Xylenes Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited though the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Method EPA 524.2 Method EPA 524.2 Haloacetic Acids (HAA-5) Total Trihalomethanes (TTHM) Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 4 (includes Chain of Custody)

Sincerely,

Celey D. Reene Laboratory Director



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, #102 HOBBS, NM 88240 FAX TO: (575) 393-4388

Receiving Date: 01/26/10 Reporting Date: 01/27/10 Project Owner: HOLLY ENERGY (HOL-09-014) Project Name: MONUMENT SECTION 35 Project Location: LEA COUNTY, NM Sampling Date: 01/20/10 Sample Type: SOIL Sample Condition: COOL & INTACT @ 2 °C Sample Received By: JH Analyzed By: ZL

LAB NO. SAMPLE ID	BENZENE _(mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS DATE:	01/26/10	01/26/10	01/26/10	01/26/10
H19145-1 #1 16' BGL	0.381	0.624	1.47	4.21
	. W. A da a con a management of the state of			
Quality Control	0.044	0.042	0.043	0.126
True Value QC	0.050	0.050	0.050	0.150
% Recovery	0.88	.84.0	86.0	84.0
Relative Percent Difference	<1.0	<1:0	<1.0	<1.0

METHODS: BTEX - SW-845 8021B

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES. Reported on wet weight.

*Surrogate recovery outside historical range due to matrix effect.

Lab Director

02/02/10

H19145 BTEX SESI

PLEASE NOTE: Liability and Damages. Cardinal's liability and clearly exclusive rameay for any clean ansing, whether based in contract or tot. shall be imited to the empiritient for analysis All cleans, industing those for regiligence and any other cause whateaver shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the analysis and cleans, industing those for regiligence and any other cause whateaver shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the analysis damaged received by Cardinal by lices to insure out of trades to insure any other exclusions using out of a received by Cardinal sources of successors mains out of a received by Cardinal, received without encoded the cardinal source of successors insure out of the recordure of successors made international of the analysis relate only to the semicles likeshind above-otable recordured except in full was writion approval of Cardinal Laborations.



PHONE (575) 395-2326 • 101 E. MARLAND • HOBBS, NM 86240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, #102 HOBBS, NM 88240 FAX TO: (575) 393-4388

Receiving Date: 01/25/10 Reporting Date: 02/01/10 Project Owner: HOLLY ENERGY (HOL-09-014) Project Name: MONUMENT SECTION 35 Project Location: LEA COUNTY, NM Sampling Date: 01/20/10 Sample Type: SOIL Sample Condition: COOL & INTACT @ 2 °C Sample Received By: JH Analyzed By: AB

		GRO	DRO
		(C ₆ -C ₁₀)	(>C ₁₀ -C ₂₈)
LAB NUMBER	SAMPLE ID	(mg/kg)	(mg/kg)
ANALYSIS DAT	Έ;	01/30/10	01/30/10
H19145-1	#1 16' BGL	461	1,990
		······································	
	······	,	
Quality Control		548	492
True Value QC		500	500
% Recovery		110	98.4
Relative Percen	t Difference	5.9	1.7

METHOD: SW-846 8015 M. Reported on wet weight.

Not accredited for GRO/DRO.

X. Chemist'

ostortin

Date

H19145 TPH8015 SESI

PLEASE NOTE Liability and Lamages. Condinatis isobility and client is exclusive remeay for any client analysis based in exclusion responses on registeries of any client caracteries while a decred value is client and client by Client analysis. All demonstrations in registeries and any client caracteries while a decred value is obtained by Client analysis. The event and Continuation where the product while a decred value is client in the applicable service. It is event and control by Client in consistent in the applicable of an event and control by Client in the applicable activation of the applicable of accesses in client of the applicable of a client in the applicable of accesses in the applicable of accesses in a client of the applicable of accesses of any client accesses in a client of the applicable of accesses of accesses of a client of the applicable of accesses of a client of the applicable of accesses of accesses of accesses of accesses of a client of

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101 East Marland, Hobbs, NM 88240						
(575) 393-2326 Fax (575) 393-2476		Page of				
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Project Manager: 1306 Ailen	P.O. #:					
Address: 703 E. Clinkow	Company: SIAMC					
City: 1201045 State: NWZip: 88240	Attn:					
Phone #: 575 3970510 Fax #: 575 393.4388	 Encodere entreferències delle contribute qualitation de delle franchise contrate a les dans encodes et a 					
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Project #: HUL-09-014 Project Owner: 1-1014 ELeca	√City:					
Project Name: Monument Section 35	- State: Zip:					
Project Location: Lea Cuupty Nu	Phone #:					
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Concerning to a server shall be light for highlights or consequantial damages, including without lights internations, loss of use, or lass of molds incurred by client, its subsidiaries, 600 about or auccessory arising out of or related to the nerformance of services travender by Cardinal, regardless of whether such claim is based upon any of the above stated reserve or ither-ster.

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† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.



PHONE (575) 393-2326 * 101 E. MARLAND * HOBBS, NM 88240

March 8, 2010

Bob Allen Safety & Environmental Solutions, Inc. 703 East Clinton, #102 Hobbs, NM 88240

Re: Monument Section 35 (HOL-09-014)

Enclosed are the results of analyses for sample number H19373, received by the laboratory on 03/03/10 at 4:35 pm.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021 Method SW-846 8260 Method TX 1005 Benzene, Toluene, Ethyl Benzene, and Total Xylenes Benzene, Toluene, Ethyl Benzene, and Total Xylenes Total Petroleum Hydrocarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accredited though the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Method EPA 524.2 Method EPA 524.2 Haloacetic Acids (HAA-5) Total Trihalomethanes (TTHM) Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

Total Number of Pages of Report: 3 (includes Chain of Custody)

Sincerely,

Celey D/keene

Laboratory Director

This report conforms with NELAP requirements.



PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR SAFETY & ENVIRONMENTAL SOLUTIONS, INC. ATTN: BOB ALLEN 703 E. CLINTON, #102 HOBBS, NM 88240 FAX TO: (575) 393-4388

Receiving Date: 03/03/10 Reporting Date: 03/08/10 Project Owner: HOLLY (HOL-09-014) Project Name: MONUMENT SECTION 35 Project Location: MONUMENT, NM

Sampling Date: 03/03/10 Sample Type: SOIL Sample Condition: COOL & INTACT @ 1ºC Sample Received By: JH Analyzed By: AB/ZL

LAB NO.	SAMPLE ID	418.1 TPH <u>(</u> mg/kg)	BENZENE (mg/kg)	TOLUENE (mg/kg)	ETHYL BENZENE (mg/kg)	TOTAL XYLENES (mg/kg)
ANALYSIS E	DATE:	03/04/10	03/05/10	03/05/10	03/05/10	03/05/10
H19373-1	SURFACE SAMPLE #1	<100	<0.050	<0.050	<0.050	<0.300
H19373-2	BH#1 SAMPLE #2 5'	<100	<0.050	<0.050	<0.050	<0.300
H19373-3	BH#1 SAMPLE #3 10'	<100	<0.050	0.079	0.085	<0.300
H19373-4	BH#1 SAMPLE #4 13'	<100	<0.050	0.054	0.066	<0.300
H19373-5	BH#1A-10'	<100	<0.050	0.064	0.127	<0.300
Quality Cont		310	0.050	0.047	0.044	0.131
True Value C	and the second	300			0.050	0.150
% Recovery	and the second of the second sec	103	100		88.0	an conserver restaurants of
	cent Difference	1.4	1.0	4.5		5.2

METHODS: TPH - EPA 418.1; BTEX - EPA SW-846-8021

TEXAS NELAP ACCREDITATION T104704398-08-TX FOR BENZENE, TOLUENE, ETHYL BENZENE, AND TOTAL XYLENES.

Not accredited for 418.1 TPH. Reported on wet weight.

Chemist

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"hone #: (505) 397-0510			Address:						
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CARDINAL Laboratories

September 28, 2010

Bob Allen Safety & Environmental Solutions 703 East Clinton Hobbs, NM 88240

RE: HOL-10-002

Enclosed are the results of analyses for samples received by the laboratory on 09/08/10 16:15.

Cardinal Laboratories is accredited through Texas NELAP for:

Method SW-846 8021Benzene, Toluene, Ethyl Benzene, and Total XylenesMethod SW-846 8260Benzene, Toluene, Ethyl Benzene, and Total XylenesMethod TX 1005Total Petroleum Hydorcarbons

Certificate number T104704398-08-TX. Accreditation applies to solid and chemical materials and non-potable water matrices.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey & Kune

Celey D. Keene Lab Director/Quality Manager

Page 1 of 7

N Laboratories

Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388

Received:	09/08/2010	Sampling Date:	09/07/2010
Reported:	09/28/2010	Sampling Type:	Soil
Project Name:	HOL-10-002	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Hope S. Moreno
Project Location:	MONUMENT, NM		

Sample ID: SPOILS PILE (H020816-01)

BTEX 8021B		kg	Analyze	d By: CK					
Analyte	Result Reporting Limit		Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/13/2010	ND	2150	85.9	2500	2.16	
Toluene*	<0.050	0.050	09/13/2010	ND	2000	79.9	2500	2.19	
Ethylbenzene*	<0.050	0.050	09/13/2010	ND	2090	83.5	2500	2.15	
Total Xylenes*	<0.150	0.150	09/13/2010	ND	6080	81.1	7500	2.55	
Surrogate: 4-Bromofluorobenzene (PIL	102 9	% 80-120							
Ignitability	°F		Analyze	d By: AB					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Ignitability	>140		09/20/2010		76.0	98.7	77.0		
рН	рН (Jnits	Analyze	d By: HM			· · · · · · · · · · · · · · · · · · ·		
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
рН	8.16	0.100	09/15/2010		6.98	99.7	7.00	0.130	
Reactive Cyanide	mg/	'L	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Reactive Cyanide	<0.100	0.100	09/20/2010	ND					
Reactive Sulfide	mg/	'L	Analyze	d By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Reactive Sulfide	<0.0100	0.0100	09/20/2010	ND					
Semi-volatile TCLP 1311/8270C	mg/	′L	Analyze	d By: AB/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Pyridine	<0.001	0.001	09/27/2010	ND	0.001	10.2	0.0100	7.55	
1,4-Dichlorobenzene	<0.001	0.001	09/27/2010	ND	0.005	48.1	0.0100	2.95	

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any dam ansing, whether based in contract or tort, shall be limited to the amount paid by chent for analyses. All dams, including those for negligence and any other cause whatsoever shall be general waved unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, watorut immutation, business interruptions, loss of usos of usos. This report shall not be reproduced except in Milwith wither approval of Cardinal Laborationes.

Kene dance

Celey D. Keene, Lab Director/Quality Manager

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Page 2 of 7

CARDINAL Laboratories

Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388

Received:	09/08/2010
Reported:	09/28/2010
Project Name:	HOL-10-002
Project Number:	NONE GIVEN
Project Location:	MONUMENT, NM

Sampling Date:09/07/2010Sampling Type:SoilSampling Condition:** (See Notes)Sample Received By:Hope S. Moreno

Sample ID: SPOILS PILE (H020816-01)

Semi-volatile TCLP 1311/8270C Analyzed By: AB/ mg/L Method Blank BS True Value QC RPD Qualifier Analyte Reporting Limit Analyzed % Recovery Result 09/27/2010 ND 0.006 58.0 0.0100 3.06 2-Methylphenol < 0.001 0.001 0.001 09/27/2010 ND 0.004 36.7 0.0100 8.36 4-Methylphenol < 0.001 0.001 09/27/2010 ND 0.005 49.2 0.0100 2.21 Hexachloroethane < 0.001 Nitrobenzene < 0.001 0.001 09/27/2010 ND 0.009 86.3 0.0100 1.84 Hexachlorobutadiene < 0.001 0.001 09/27/2010 ND 0.005 51.7 0.0100 5.16 0.001 09/27/2010 ND 0.011 111 0.0100 0.0898 2,4,6-Trichlorophenol < 0.001 2,4,5-Trichlorophenol < 0.001 0.001 09/27/2010 ND 0.011 108 0.0100 2.10 09/27/2010 0.005 ND 53.9 0.0100 2,4-Dinitrotoluene < 0.001 0.001 7.11 Hexachlorobenzene < 0.001 0.001 09/27/2010 ND 0.007 71.9 0.0100 11.0 09/27/2010 0.009 Pentachlorophenol < 0.001 0.001 ND 91.9 0.0100 1.87 21-100 Surrogate: 2-Fluorophenol 37.3% 10-94 Surrogate: Phenol-d5 31.5 % Surrogate: Nitrobenzene-d5 107 % 35-114 Surrogate: 2-Fluorobiphenyl 104 % 43-116 Surrogate: 2,4,6-Tribromophenol 10-123 54.8 % Surrogate: Terphenyl-dl4 38.5 % 33-141 **TCLP** Arsenic Analyzed By: CK mg/L Analyte Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD Qualifier 0.10 09/22/2010 ND 4.09 Arsenic 0.10 102 4.00 3.13 GAL **TCLP Barium** mg/L Analyzed By: CK Analyte Result Reporting Limit Analyzed Method Blank BS % Recovery True Value QC RPD Qualifier

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages, Cardinal's lability and clients exclusive remeoy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatassewer shall be forened valued unless, made in writing and received by Cardinal within thrity (30) days after completion of the applicable service. In no event shall Cardinal be lable for incidental to consequential camages, including, without limitation, business interruptions, loss of use, or loss of profiles incidental or subsidiaries, affiliates or successors analing out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claims based unal work in the topologic exerces in full with writter approval of Cardinal Laboratories.

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Celey D. Keene, Lab Director/Quality Manager

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Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388

Received:	09/08/2010	Sampling Date:	09/07/2010
Reported:	09/28/2010	Sampling Type:	Soil
Project Name:	HOL-10-002	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Hope S. Moreno
Project Location:	MONUMENT, NM		

Sample ID: SPOILS PILE (H020816-01)

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RPD	Qualifier
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Celey D. Keene, Lab Director/Quality Manager

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Analytical Results For:

Safety & Environmental Solutions Bob Allen 703 East Clinton Hobbs NM, 88240 Fax To: (575) 393-4388 PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 86240

Received:	09/08/2010	Sampling Date:	09/07/2010
Reported:	09/28/2010	Sampling Type:	Soil
Project Name:	HOL-10-002	Sampling Condition:	** (See Notes)
Project Number:	NONE GIVEN	Sample Received By:	Hope S. Moreno
Project Location:	MONUMENT, NM		

Sample ID: SPOILS PILE (H020816-01)

mg/L Analyzed By: CMS TCLP Volatile 1311/8260 Method Blank Analyte Result **Reporting Limit** Analyzed ΒS % Recovery True Value QC RPD Qualifier 09/16/2010 ND 0.018 92.3 0.0200 Vinyl chloride <0.002 0.002 6.09 0.002 09/16/2010 0.010 0.458 0.400 2-Butanone 0.016 114 9.14 1,1-Dichloroethene 0.002 09/16/2010 ND 0.022 111 0.0200 0.766 < 0.002 09/16/2010 0.021 0.0200 < 0.002 0.002 ND 104 1.01 Chloroform 0.002 0.022 0.0200 Carbon tetrachloride < 0.002 09/16/2010 ND 109 1.34 09/16/2010 0.020 99.7 0.0200 Benzene < 0.002 0.002 ND 0.350 < 0.002 0.002 09/16/2010 ND 0.022 0.0200 3.80 1.2-Dichloroethane 111 Trichloroethene <0.002 0.002 09/16/2010 ND 0.021 104 0.0200 2.74 Tetrachloroethene < 0.002 0.002 09/16/2010 ND 0.019 92.6 0.0200 0.860 Chlorobenzene < 0.002 0.002 09/16/2010 ND 0.020 102 0.0200 0.294 1,4 Dichlorobenzene <0.002 0.002 09/16/2010 ND 0.022 111 0.0200 1.50 Surrogate: Dibromofluoromethane 108 % 80-120 Surrogate: Toluene-d8 97.3 % 80-120

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Surrogate: 4-Bromofluorobenzene

92.3 %

80-120

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Celey D. Keene, Lab Director/Quality Manager

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PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

Z-01	>140
GAL	Analysis subcontracted to Green Analytical Laboratories, a subsidiary of Cardinal Laboratories.
В	Analyte is found in the associated blank as well as in the sample (CLP B-flag).
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500CI-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

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PLEASE NOTE: Lability and Damages. Cardinal's leability and client's exclusive remedy for any daim arising, whether based in contract or tort, shall be limited to the amount pad by chent for analyses. All claims, including triose for negligence and any other cause whatsoever shall be deemed waved unless made in writing and received by Cardinal within thinty (30) days after completion of the applicable service. In no event shall cardinal be lable for incidential or consequential damages, including, without limitation, business interruptions, loss of upost of upost of profits incurred by client, is subsidiarea, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such dams based upon any of the above studer essons or oursels. Results relate only the sample called called called called and any of the above studer essons or ourses.

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Celey D. Keene, Lab Director/Quality Manager

ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240

(505) 393-2326 Fax (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Page_____ cf_____

City: Hobbs State: NM_Zip: 88240 Attm: Phone #: 575-397-0510 Fax #: 575-393-4388 Address: Project #: Hol-Ho-coll Project Owner: Holly Energy City: Project Name: Monument Jet State: Zip: Project Location: Monument Phone #: Address:		(505) 393-2326 Fa	x (505) 393-24	476									an ta at an an an isan a	i i animaria								Faye_	U	1		
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† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.

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Appendix B Site Photographs

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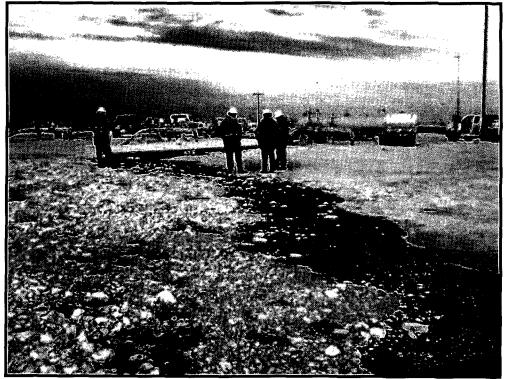
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Site Photographs December 28,2009



Release Area facing east



Release Area facing northeast

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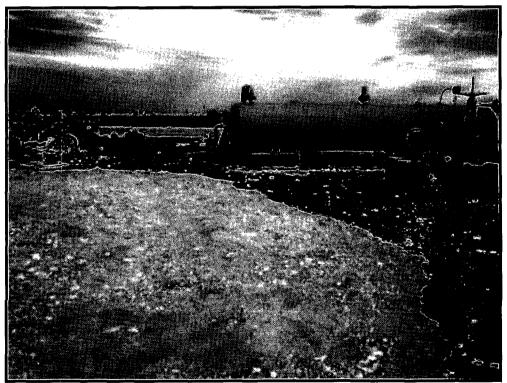
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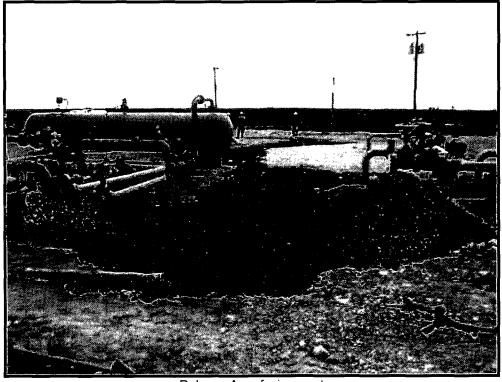
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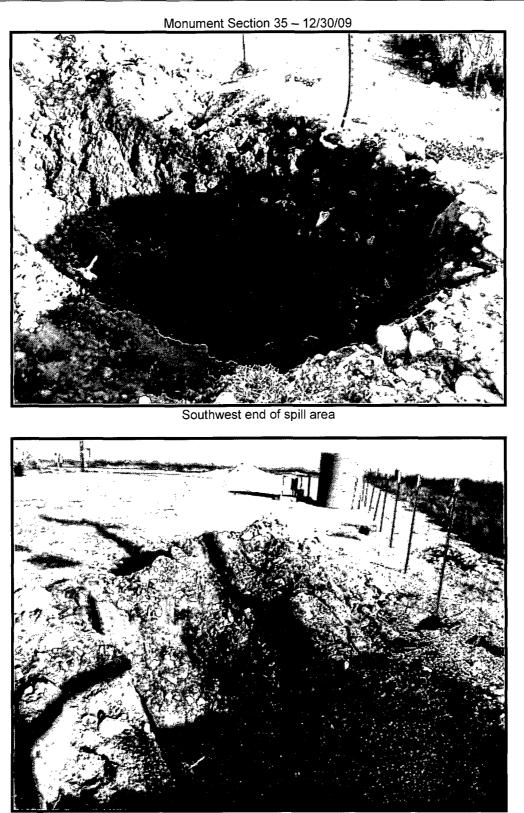
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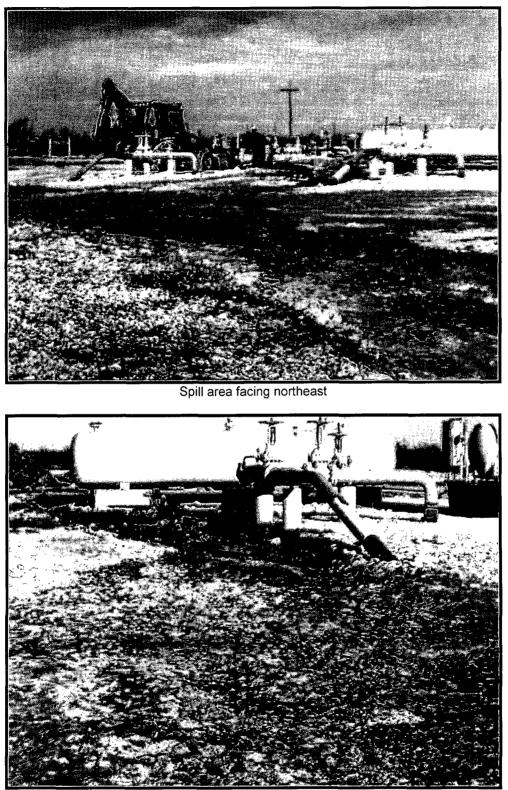
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Spill area facing east



Test Trench #2

Monument Section 35 Closure Report May 5, 2010

Holly Energy Partners Lea County, New Mexico



Spill Area facing east



Spill area facing north

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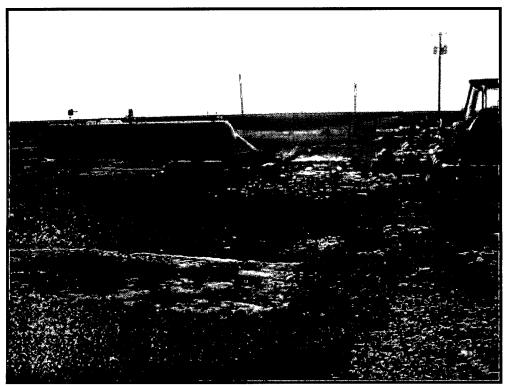
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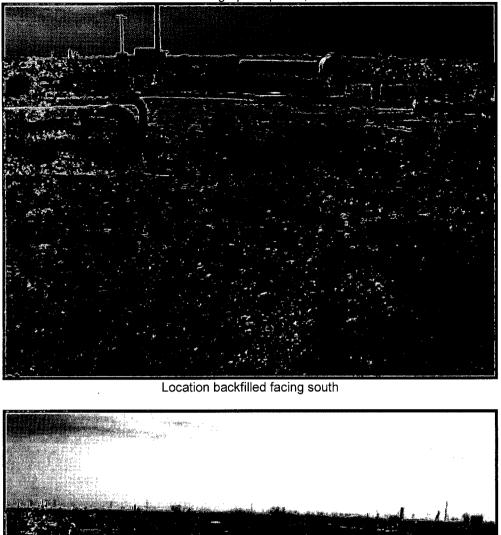


Spill area facing east



Spill area facing west







Location backfilled facing northeast

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Location backfilled facing east

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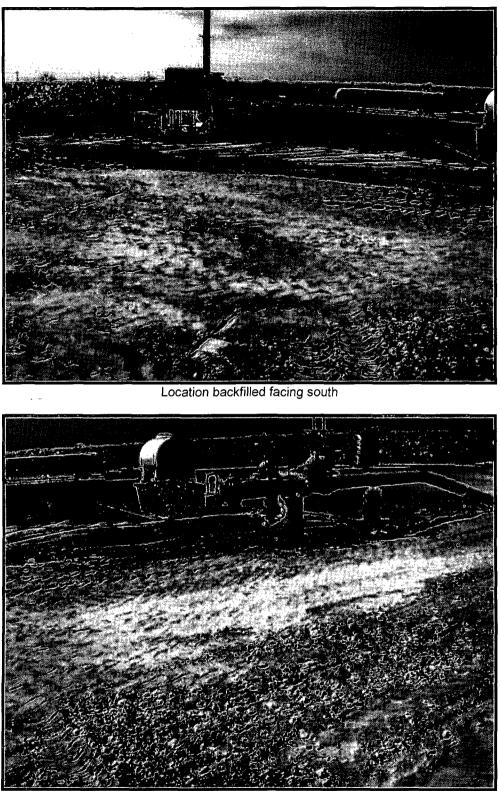
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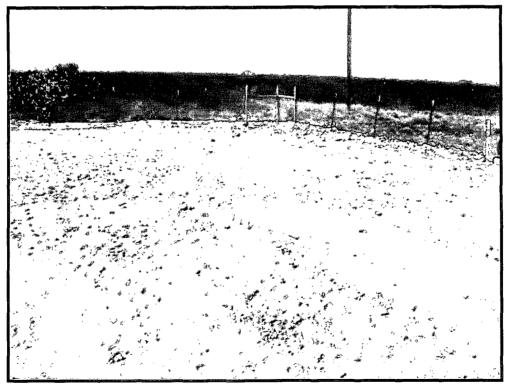
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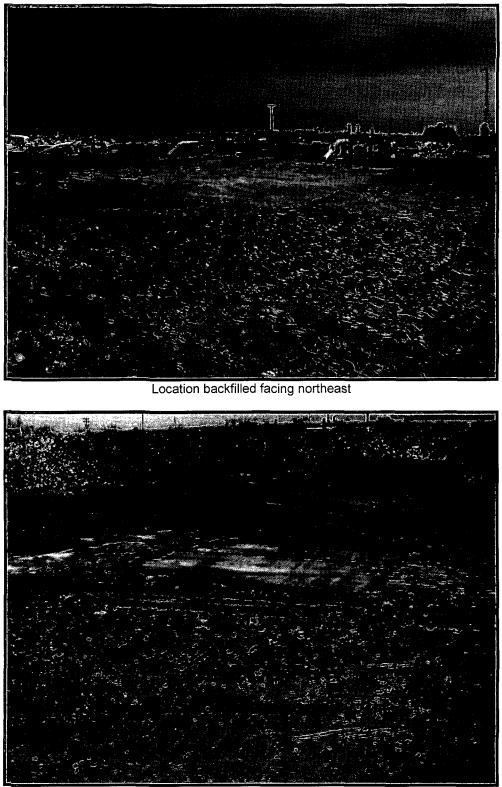
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Location backfilled facing southwest



Location backfilled facing southwest



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Appendix C C-141

District I 1625 N. French	n Dr., Hobbs,	NM 88240				f New Mex	-			D		Form C-141
District II 1301 W. Grand Avenue, Artesia, NM 88210			0	Energy Minerals and Natural Resources				Revised October 10, 200				
District III 1000 Rio Brazos Road, Aztec, NM 87410				Oil Conservation Division 1220 South St. Francis Dr.					Submit 2 Copies to appropriat District Office in accordanc with Rule 116 on bac			
District IV 1220 S. St. Fran	1000 G Dr P					Fe, NM 875				WI	ith Rule	side of form
		<u> </u>	Rel		_		orrective A	ction				
			~~~~			OPERA'			🛛 Initi	al Report	X	Final Repo
Name of Company Holly Energy Partners - Operating, L.P.						Contact Dickie Townley (Manager of EHS)						1 mai ropo
		60, Artesia,	NM 882	11-1260			No. 575-748-89		D' () ()			
Facility Na							e Crude Oil Ma	anifold /				
Surface Ow	mer State	of New Mex	tico	Mineral (	Owner	State of Nev	v Mexico		Lease N	No. N/A		
						N OF RE						
Unit Letter	Section 35	Township 19S	Range 37E	Feet from the	Nort	h/South Line	Feet from the	East/Wo	est Line	County		
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				Latitude <u>32.6</u>	519791	Longit	ide <u>-103.22768</u>	88				
				NÅT	n ar an	OF REL	RASE					
Type of Role							Release 5 bbls		Volume F	Recovered 0		
Source of Ro	lease Unde	r ground Pipe	line				our of Occurrenc			Hour of Disc	covery	12/28/2009
Was Immediate Notice Given?						12/28/2009 If YES, To	Whom?		@ 12:30 1	E-1VI		
			Yes [	No 🗌 Not R	equired		(NMOCD 37					
By Whom? Dickie Townley Was a Watercourse Reached?							our 12/28/2009 ( lume Impacting t			confirmation	)	
was a water	course Reac		Yes 🛛	No		II YES, VO	tume impacting t	no watero	course.			
If a Watercou	irse was lim	pacted, Descri	ibe Fully.*	<u> </u>	·····	,	- <u></u>					
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Describe Cau	se of Proble	m and Demo	fial Action	Takon *								
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