

LEAK DETECTION AND COMPLIANCE QUARTERLY REPORT

Fourth Quarter 2011

Site Name: Yellow Bandit No. 1
Operator: Franklin Energy Resources

Report Date:
January 2012

Disclaimer

The City of Grand Prairie has provided this document as guidance only. All operators will need to determine the appropriate reporting format to document equipment monitoring schedule, results, and any corrective action employed in the preceding quarter. Additional guidance on potential emission sources and mitigation approaches can be obtained by the Texas Railroad Commission, Texas Commission on Environmental Quality, and/or U.S. Environmental Protection Agency. Mention of specific equipment does not imply an endorsement of these products or services.

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Leak Detection and Compliance Quarterly Report

Fourth Quarter 2011

INTRODUCTION

This quarterly report provides the results of ongoing monitoring as required by Section 13-505(c)(35) of the Grand Prairie Ordinance for Drilling, Completion, and Production Operations Permit for Class 1/Class 2 Wells and as proposed in the City-approved Leak Detection and Compliance Plan (LDCCP) dated April 15, 2011.

The Site documented in this report includes:

- **Yellow Bandit No. 1**
 - Well No.s X439-32673 and X439-32674

The Operator of the Site is:

- **Franklin Energy Resources**

Equipment monitored at this Site currently includes:

- **Two (2) gas wells and connective piping, valves, and fittings**
- **Two (2) separator systems with connective piping, valves, and fittings**
- **Tank Battery with four (4) Aboveground Storage Tanks (ASTs), connective piping, valves, fittings, and thief hatches**
- **One (1) line compressor**
- **Ancillary equipment and connections for off-site gas distribution**

This report includes results from:

- **Baseline Sampling** – Completion of baseline air sampling in March 2011 to establish preexisting Volatile Organic Compound (VOC), Reduced Sulfur Compound (RSC) and Carbonyl levels at the Site. A copy of the Ambient Air Monitoring Report is included as Appendix A.
- **Daily AVO Observations** – Daily performance of Audio/Visual/Olfactory (AVO) observations by Pumpers and related company personnel visiting the Site. AVO Monitoring pages for all events that identified potential concerns have been included in Appendix B.
- **Remote Monitoring** – Results of remote monitoring are discussed. As outlined in the LDCP, remote monitoring of the AST fluid levels, casing pressures, and other system components serve as an early indication that equipment issues may be present.
- **Quarterly Field Inspection/Monitoring** – Quarterly Field Inspection/Monitoring Results performed by a third-party firm for this quarter are documented in this report. The resulting field forms and document is included in Appendix C.
- **Corrective Action** – A listing of corrective action activities performed to address potential concerns noted this quarter have been included.
- **Training and Process Improvement** – A summary of the continual training of staff to ensure minimization of potential operational or equipment failures and the evaluation of rapidly changing industry practices for potential application at the Site were included.

1 BASELINE/CURRENT SITE CONDITIONS

1.1 AMBIENT AIR SAMPLING RESULTS

Prior to installation of wells and related production equipment, ambient air samples were collected to document conditions at the Site.

Two (2) samples were collected over consecutive 24-hour periods in March 2011. The air samples were analyzed for Volatile Organic Compounds (VOCs), Reduced Sulfur Compounds (RSCs) and Carbonyls. Please refer to the full summary report in Appendix A for more detail on the sampling methodology and data evaluation,

VOC concentrations observed included the following:

- Acetone (up to 18.4 ppbv),
- Benzene (up to 0.18 J ppbv),
- tert-Butyl alcohol (up to 2.9 ppbv),
- Carbon disulfide (up to 0.26 ppbv),
- Chloromethane (up to 0.97 ppbv),
- Ethanol (up to 4.8 ppbv),
- Ethylbenzene (up to 0.1 J ppbv),
- Ethyl acetate (up to 4.1 ppbv),
- Heptane (up to 0.22 J ppbv),
- Hexane (up to 0.21 ppbv),
- Methylene chloride (up to 0.81 ppbv),
- Methyl butyl ketone (up to 0.64 ppbv),
- 2-butanone/MEK (up to 9.9 ppbv),
- 4-methyl-2-pentanone/MIBK (up to 0.15 J ppbv),
- Isopropyl alcohol (up to 1.2 ppbv),
- Styrene (up to 0.11 J ppbv),
- Tetrachloroethene (up to 0.54 ppbv),
- Tetrahydrofuran (up to 0.15 J ppbv),
- Toluene (up to 2.6 ppbv),
- Trichloroethylene (up to 0.14 ppbv),
- 1,2,4-Trimethylbenzene (up to 0.12 J ppbv)
- m,p-Xylene (up to 0.3 ppbv) and,
- o-Xylene (up to 0.088 ppbv J).

RSC concentrations observed included the following:

- Hydrogen sulfide (up to 8.4 ppbv)
- Carbon disulfide (up to 2.5 ppbv)

Carbonyl concentrations observed included the following:

- *Formaldehyde (up to 9.6 ppbv)*

No additional air sampling has been conducted to date. If future air sampling is conducted in response to ongoing monitoring activities, these will be reported in subsequent quarterly reports.

1.2 SOIL SAMPLING RESULTS

No soil samples were collected during the previous quarter. Sampling to address any spills or releases will be noted in the appropriate report section.

1.3 GROUNDWATER SAMPLING RESULTS

Water well sampling was completed for wells within 750 feet of the Site. This data was previously provided to the City under separate cover. No groundwater samples were collected during this quarter.

1.4 SURFACE WATER SAMPLING RESULTS

Surface water sampling was not conducted during this quarter.

Existing padsites will often not have baseline data. Only report information collected to date, as available. It may be helpful to periodically obtain operational baseline data if concerns are being expressed by neighboring property owners.

2 DAILY AVO FIELD INSPECTION

As part of normal operations, Franklin Energy Resources visits each operating pad site on a near daily frequency. As outlined in the LDCP, our Pumpers have included the performance of Audio/Visual/Olfactory (AVO) inspections during each daily visit.

2.1 INSPECTION POINTS

Below is a listing of site inspection points included in the daily AVO activities.

- **Tubing Pressure Confirmation** – Dedicated gauges are monitored and compared against previous results for indication of system leakage or process adjustment needs;
- **Production Casing Pressure Confirmation** – Dedicated gauges are monitored and compared against previous results for indication of system leakage or process adjustment needs;
- **Braden Head Pressure Confirmation** – Dedicated gauges are monitored and compared against previous results for indication of system leakage or process adjustment needs;
- **Needle Valve, Controls, High/Low Valve Inspection** – Well equipment are inspected to ensure no visual, audible or olfactory signs of a release are indicated. Evaluation of equipment wear and potential need for replacement will also be a component of the Daily AVO Field Inspection;
- **Well Head Fluid Containment/Spillage** – Anti-corrosion, scale inhibitors, and other fluids are utilized to maintain the well(s). The fluid is within secondary containment with field inspections noting spillage within the containment as well as the integrity of the secondary containment system(s).
- **Well Head to Separator Piping Inspection** – The fittings and piping between the well and separator are inspected, where visible, for signs of corrosion or

leakage. Equipment wear is noted to facilitate preemptive maintenance where appropriate.

- **Separator Inspection** – Includes evaluation for audible signs of leakage, confirmation of fluid recovery system, and confirmation of the gas production/flow volumes.
- **Tank Battery Inspection** – The piping connecting the separator to the ASTs are within secondary containment system for the entire tank battery. The piping is visually inspected, where visible, for signs of corrosion or leakage. Equipment wear will be noted to facilitate preemptive maintenance where appropriate. Additionally, all ASTs will be gauged to confirm remote sensor monitoring of fluid levels and that all thief hatches are closed when not in use for monitoring and that all AST vents are functioning properly.
- **Waste Transfer Connection** – Catch basins will be installed on each fluid transfer point to minimize the potential for waste fluid discharge into the secondary containment system or volatilization. The Daily Field Inspection will include confirmation that the catch basins are not full and that waste hauler practices minimize the potential for future releases.
- **Ancillary Equipment** – While additional equipment such as line compressors, vapor recovery units, or glycol dehydrators are not anticipated, the LDCP will be updated with additional protocol for any future equipment that is added to the site.

An example AVO Checklist is provided in Appendix B

2.2 DAILY AVO RESULTS

The daily AVO monitoring for this quarter identified the following potential concerns:

September 22, 2011 – Surficial staining was observed near Well No. 2 and resulted in the replacement of a pipe fitting based on remnant staining on the production piping. Replacement occurred within 5 days of suspected leak.

November 12, 2011 – In response to elevated PID readings by third-party monitoring personnel on November 11, 2011 and petroleum odors noted during the November 12, 2011 AVO inspection, the Thief Hatch on AST No. 2 was fitted with a new neoprene gasket. Following gasket replacement, no odors or PID readings were noted on November 14, 2011.

AVO inspections should become part of normal operations. This will provide the operators with the most frequent method to document when a concern is or is not present at a padsite. When reporting issues noted from the previous quarter, only the significant occurrences need to be communicated to the City – provided there is a clear understanding of what is inspected on a daily to weekly basis.

3 REMOTE PROCESS EQUIPMENT MONITORING

As part of the LDCP, Franklin Energy Resources included the use of Remote Process Equipment Monitoring. Our Site is equipped with monitors that provide hourly confirmation of the tubing pressure, casing pressure, gas flow rates, and AST fluid inventory to ensure the system is functioning properly and that leaks and spills are not indicated. Through the use of near real-time monitoring equipment notification alarms we maintain a constant understanding of these parameters.

Should a significant drop in pressure or fluid levels be identified, our staff is immediately notified so appropriate action can be taken.

3.1 MONITORING RESULTS

Throughout this quarter, the recorded monitoring results were compared to Daily Field AVO Inspection records to verify the actual site conditions as well as the accuracy of field pressure and gauging sensors.

- **Tubing Pressure** – All daily pressure readings were consistent with less than 10% difference noted;
- **Casing Pressure** – All daily pressure readings were consistent with less than 10% difference noted;
- **Fluid Levels** – All fluid levels were consistent with field observations and schedule waste disposal events.
- **Emergency Shutoff Events** – No well shutoff events occurred this quarter.

No significant issues were identified during remote monitoring this quarter.

Remote monitoring is the most often cited means of Leak Detection. As such, it is important that the City understand what changes in pressure or fluid levels would cause a higher level of inspection to be employed. It is not necessary to report all pressure levels, just changes that signaled a concern within the last quarter.

4 QUARTERLY FIELD INSPECTION

As outlined in our LDCP, a third-party inspection was utilized to evaluate for potential environmental issues at the Site.

4.1 MONITORING GOALS

Third-party inspection included:

- **Inspection** - Visual inspection and pressure gauge confirmation as outlined in the Daily AVO Field Inspection criteria;
- **Data Evaluation** - Comparison of pressure monitoring data (field ad remote), waste fluid gauging data, and visual observations made throughout the preceding months to identify possible trends or discrepancies that warrant further scrutiny;
- **Field Testing** - Field testing for VOCs consistent with the specific Type I and Type II Leak Criteria set for the specific process equipment on site. Field monitoring sheets were prepared to document field screening results for the inspection.
- **Verification** - When suspected leaks are identified through either Remote Monitoring, Daily AVO Monitoring, or third-party inspections, additional verification is utilized specific to the type of leak noted.

Inspections can be performed by in-house staff provided they have the requisite training and can evaluate site operations independently from other company responsibilities. These inspections should provide a separate level of certainty that no leaks, spills or releases are occurring at the Site. These same staff may need to collect air, soil, surface water or groundwater samples when an issue is suspected.

4.2 FIELD INSPECTION MONITORING APPROACH

Field Inspection activities were performed by XYZ Consulting on November 11, 2011. In addition to AVO activities, the Field Inspection included use of the following equipment:

- Photoionization Detector – Model No. MiniRAE 3000

Lamp type: 10.6 ev

Detection Range: 0 to 15,000 ppmv

Detectable Compounds: Benzene, Toluene, Xylenes, Ethylbenzene, other Hazardous Air Pollutants with an ionization energy below 10.6 ev.

Monitoring included collection of background VOC readings at all corners of the Site followed by individual component monitoring from the well to the separator and the ASTs.

Key areas included dump valves, pressure relief valves, thief hatches, and fluid discharge points.

Common Field Inspection Equipment can include:
FLIR Cameras (with appropriate VOC sensing capabilities and trained staff)
Calibrated Flame-ionization Detectors (FIDs)
Calibrated Photo-ionization Detectors (PIDs) with ppbv or ppmv resolution
Mult-Gas Meters (i.e., H₂S, CO₂, O₃, CH₄)
Other equipment as dictated by the potential concerns at the site.

4.3 LEAK DEFINITION

Franklin Energy Resources has set operational Leak Definitions of:

- Areas near operating equipment: 500 ppmv (Type I Definition – operational)

- Areas at the edge of the padsite: 25 ppmv above upwind conditions (Type II Definition - background)

If exceedances of these definitions are noted, corrective action will be recommended to remedy the source of the emission.

Alternate Leak Definition may be needed based on the monitoring equipment or operational goals. Keep in mind that setting high Leak Definitions can lead to off-site impacts that may exceed receptor-based AMCVs. It is suggested to judge operational tolerances rather than maximum emissions allowed by regulatory limits.

4.4 AVO INSPECTION AND DATA EVALUATION

XYZ Consulting inspected the on-site features for signs of spills or releases:

- **Wells** – No evidence of spills or releases. The new connector piping at Well No. 2 did not exhibit evidence of a spill or release.
- **Separators** – No evidence of spills or releases.
- **ASTs** – No evidence of spills or releases noted at AST No.s 1, 3, or 4. However, a strong petroleum odor was noted in AST No. 2 during the field inspection on November 11, 2011. PID observations are noted below.
- **Ancillary Equipment** – No evidence of spills or releases were noted near other process equipment at the Site.

4.5 FIELD INSPECTION RESULTS

- PID Readings at perimeter of the padsite ranged up to 3.8 ppmv at the south part of the Site (downwind).
- PID readings ranged up to 1,500 ppmv at AST No. 2 with the emissions coming from the thief hatch. All other equipment at the Site was below 25 ppmv.

A summary of the monitoring for 2011 is included in Appendix C.

Be sure to note locations that exhibited elevated air monitoring readings. The more specific you can be the better. The only way to isolate where a problem is occurring is to document it before and after any corrective action occurs.

4.6 CORRECTIVE ACTION AND VERIFICATION ACTIVITIES

Results of the field inspection were communicated to the operator following the site visit. In response to the leak detection, Franklin Energy Resources installed a new gasket. A verification site inspection was performed by XYZ Consulting on November 14, 2011 and PID Readings of 4 ppmv were noted at the AST No. 2 thief hatch.

Corrective Action at the Site this quarter included replacement of a fitting on Well No. 2 in response to staining observed during AVO activities on September 9, 2011. Approximately five cubic yards of soil were properly characterized and disposed off-site to ensure the stained soil would not present concerns to stormwater runoff.

If significant corrective events have occurred, this will be the appropriate section to provide further detail on the root cause and remedy applied. Appropriate verification could be as simple as field screening with a PID or FID or require ambient air sampling or FLIR assessment. If a report to the City was required as part of the equipment failure, please consult with City Staff on necessary verification.

5 TRAINING AND PROCESS IMPROVEMENT

5.1 TRAINING

LDCP training has included an infield refresher course with XYZ Consulting during their Quarterly Field Inspection of the Site. Franklin Energy Resources staff present on November 14, 2011 for the training included:

- Mr. Manny Mota
- Mr. Nolan Ryan
- Mr. J.R. Richard

Additional safety and hazard assessment training developed for internal Franklin Energy Resources staff has also included mention of how AVO Inspections are completed and documented.

5.2 PROCESS IMPROVEMENT

The existing equipment is current working within normal specifications. While our company continues to monitor improvements in the industry, no additional changes to the existing system are needed at this time.

Based on the continued monitoring, an evaluation will be completed each quarter to determine if equipment has exceeded its useful lifespan or if new equipment is needed to maintain a safe operating environment.

FIGURES

--Not Included in Example--

APPENDIX A
BASELINE SAMPLING
REPORT

--No Attachment in Example--

APPENDIX B

**DAILY AVO FIELD
INSPECTION DOCUMENTS**

--EXAMPLE MATERIAL--

Daily AVO Field Inspection Checklist

Site Name: YELLOW BANDIT No. 1

Pumper/Inspector: ABT

Date: 11-12-2011

Operator: FRANKLIN BOBMAN ROSUMERS

Inspection Points:

System Pressure

- Tubing
- Casing
- Braden Head

Valves

- Needle
- Controls
- High/Low

Well Head Fluids

- Spills
- 2° Containment Intact

Piping

- Spills/Leaks
- Corrosion

Separator

- Functioning
- Dump Valve
- Spills/Leaks

Tank Battery

- Spills/Leaks
- Pressure Release Functioning
- Thief Hatch
- Closed/Sealed
- Corrosion - AST No. 1 HAS FLAKING PAINT
- 2° Containment Intact

Waste Transfer

- 2° Containment Intact
- Spills/Leaks

Compressor

- Functioning
- Spills/Leaks

General Site Conditions

- Perimeter Padsite Fence
- Spill/Leaks to ground
- Noise
- Odors
- Dust Control
- Other: _____

For any items with concerns please provide a description below:

AVO Inspection Concerns:

AST NO. 1 HAS SLIGHT POTENTIAL FOR CORROSION

AST NO. 2 THIEF HATCH NOT SEALING WELL - APPEARS TO BE GASKET

Remedy:

AST NO. 1 - MONITOR AND CONFIRM NO LOSS OF AST INTEGRITY

AST NO. 2 - ORDER NEW GASKET TO FIX THIEF HATCH

This checklist is to be used in conjunction with the Daily AVO Field Inspection Report

Leak Detection And Compliance – Daily AVO Field Inspection Report

Pumper Name: HTD Date: 9-22-11
 Site Name: YELLOW BANDIT NO. 2 Page 1 of 1
 Operator Name: FRANKLIN ENERGY

Inspection Summary - Equipment

Inspection Point	Braden	Tubing	Casing	Flow Rate	Dump Valve	Leak Indicated	Spill Indicated	Comment
	% Δ	% Δ	% Δ	MCF	Functional (Y/N)	(Y/N)	(Y/N)	
Well 1	N/A	<5	<5			N	N	
Well 2	N/A	<5	<5			Y - STAINING ON GROUND	Y - STAINING ON GROUND	SLIGHT STAIN AT BASE OF WELL - SUSPECT FITTINGS
Scale Inhb.						N	N	
Separator 1				N/A	Y	N	N	
Separator 2				N/A	Y	N	N	
Compressor						N	N	
AST Inspection	Tank Gauge (Feet/inches)	Fluid Rem (Y/N)	Corrosion (Y/N)	Thief Hatch Closed (Y/N)	Fluid Discharge Functional (Y/N)	Leak Indicated (Y/N)	Spill Indicated (Y/N)	Comment
AST 1	2' 6"	Y	N	Y	Y	N	N	FLUID DISCHARGE } CORROSION } SUSPECT FITTINGS }
AST 2	1' 5"	Y	N	Y	Y	N	N	
AST 3	2' 11"	Y	N	Y	Y	N	N	
AST 4	4' 2"	Y	N	Y	Y	N	N	

Notes:

STAINING NOTED AT WELL NO. 2. FITTINGS SUSPECTED TO HAVE ISSUE WAS TAGGED FOR INSPECTION/REPLACEMENT

EXAMPLE FORM

APPENDIX C

QUARTERLY FIELD INSPECTION REPORT XYZ CONSULTING

--Selected Attachments--

Field Monitoring & Inspection Checklist

Site Name: Yellow Bandit No. 1
Inspector: ABT
Date: 9.24.2011

Operator: Franklin Energy Resources
Well No. X439-32673
Equipment: PID (ppmv)/Four Gas Meter (%V)

Wellhead Inspection Points:

(A) Casing Components (Valves/Fittings/Piping):

ALL \leq S

(B) Master Valve Area (Connectors/Regulators):

ALL \leq S

(C) Production Tubing Components:

ALL \leq S

(D) Production Valves:

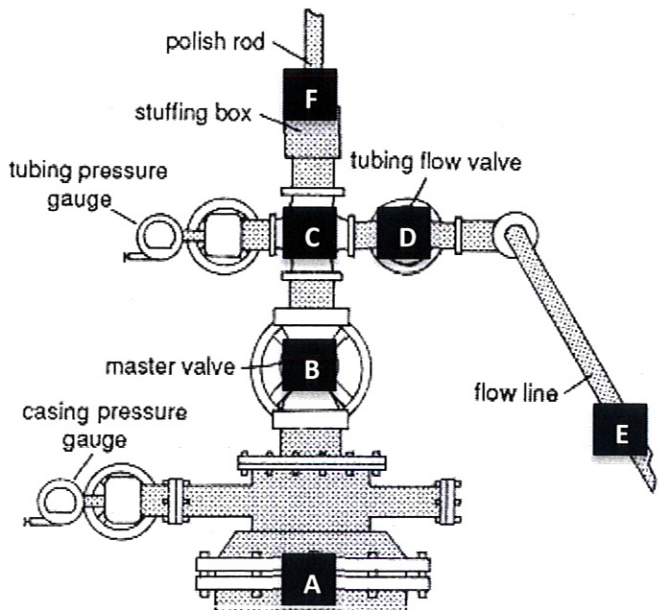
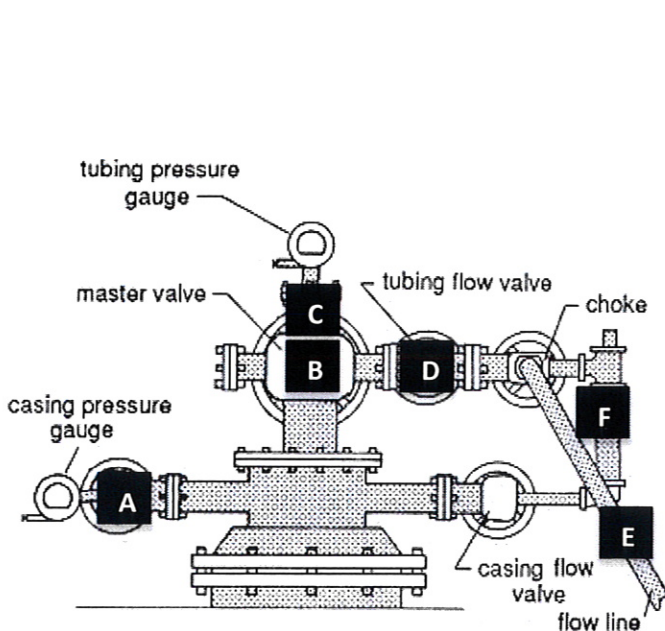
ALL \leq S

(E) Production Flow Lines:

ALL \leq S

(F) Other Wellhead Components:

ALL \leq S



Field Monitoring & Inspection Checklist

Site Name: Yellow Bandit No. 1
 Inspector: ABT
 Date: 11.12.2011

Operator: Franklin Energy Resources
 Well No. X439-32673
 Equipment: PID (ppmv)/Four Gas Meter (%V)

Separator/Tank Battery Inspection Points:

(A) Production Piping to Separator (Valves/Fittings/Piping):

ALL CS

(B) Separator (Connectors/Valves – Dump Valve):

Sep-1 17@DV, 25 Removable
Sep-2 CS

(C) Fluid Piping (Fittings/Connectors):

ALL CS

(D) Gas Piping (Fittings/Connectors):

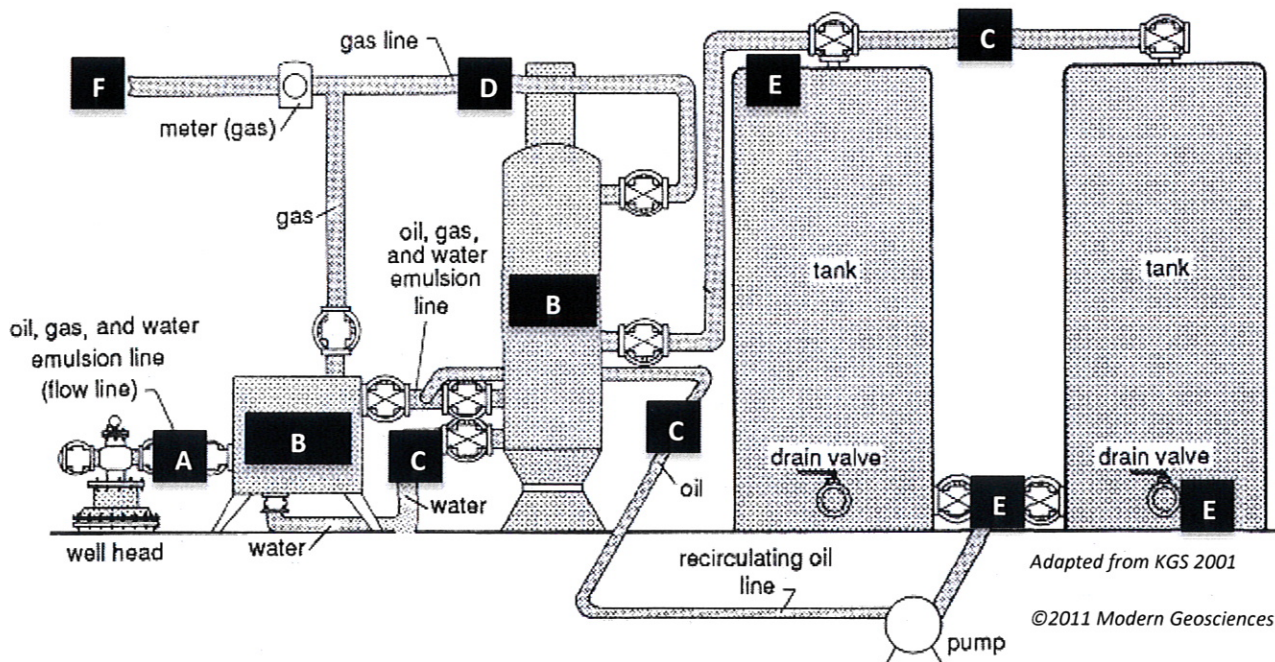
ALL CS

(E) AST (Pressure Relief/Thief Hatch/Fittings/Drains):

AST-1 CS, AST-2 1,500@TH, ND AT REMOVABLE
AST-3 CS, AST-4 14@TH, ND AT REMOVABLE

(F) Other Production Components (Compressor/Treatment/Vapor Recovery/Metering):

ALL CS



Field Monitoring & Inspection Checklist

Site Name: Yellow Bandit No. 1
Inspector: ABT
Date: 11.12.2011

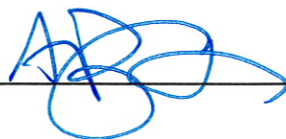
Operator: Franklin Energy Resources
Well No. X439-32673
Equipment: PID (ppmv)/Four Gas Meter (%V)

Pad Site Inspection Points:

- (A) North Perimeter: ND
- (B) South Perimeter: 3.8 ppmv near entrance to pad site
- downwind of compressor
- (C) East Perimeter: ND
- (D) West Perimeter: ND
- (E) Ancillary Equipment/Staining: ND, NO STAINING
- (F) Other Production Components (Compressor/Treatment/Vapor Recovery/Metering):
ND

Comments: THIEF HATCH @ TEST NO. 2 EXCEEDS TYPE 1 LD

Field Inspection Concerns: THIEF HATCH NEEDS REPAIR

Inspector Signature:  Date: 11-12-2011

Quarterly VOC Monitoring Summary

Site Name: Yellow Bandit No. 1

Operator Name: Franklin Energy Resources

Production Equipment (Type I) – Highest tVOCs Observed

Inspection Area	1Q	2Q	3Q	4Q	Leak Indicated	Fixed	Date Verified	Comment
	3.12.2011	6.09.2011	9.14.2011	11.12.2011	(Y/N)	(Y/N)		
Well 1 Casing	12	<5	<5	<5	N	--	--	
Well 1 Tubing	<5	<5	21	<5	N	--	--	
Well 2 Casing	<5	<5	<5	<5	N	--	--	
Well 2 Tubing	<5	31	40	<5	N	--	--	Spill noted in 3Q, fitting replaced
Separator 1	<5	<5	<5	<5	N	--	--	
No.1 Dump Valve	62	35	<5	17	N	--	--	
Separator 2	<5	<5	<5	<5	N	--	--	
No. 2 Dump Valve	<5	<5	<5	<5	N	--	--	
AST 1 Piping/Drain	<5	15.5	18	<5	N	--	--	
AST 1 Thief Hatch	65	20	<5	<5	N	--	--	
AST 2 Piping/Drain	<5	<5	<5	<5	N	--	--	
AST 2 Thief Hatch	210	415	344	1,500	Y	Y; <5	11.14.2011	Thief Hatch gasket replace and verified
AST 3 Piping/Drain	<5	<5	<5	<5	N	--	--	
AST 3 Thief Hatch	<5	<5	<5	<5	N	--	--	
AST 4 Piping/Drain	<5	<5	<5	<5	N	--	--	
AST 4 Thief Hatch	1	12	13	17	N	--	--	
Scale Inhb.	<5	<5	<5	<5	N	--	--	
Compressor (5')	<5	<5	<5	<5	N	--	--	

EXAMPLE FORM

Ambient Site Readings (Type II) – Highest tVOCs Observed

North Perimeter	<5	<5	<5	<5	N	--	--	
East Perimeter	<5	<5	<5	<5	N	--	--	
South Perimeter	<5	<5	<5	<5	N	--	--	
West Perimeter	<5	14	<5	<5	N	--	--	Upwind reading in 2Q
Spill Areas	<5	<5	<5	<5	N	--	--	
Other	<5	<5	<5	<5	N	--	--	

Notes:

Type I Leak Definition – 500 ppmv
 Type II Leak Definition – 25 ppmv
 All total VOC (tVOC) data presented in ppmv.