EXHIBIT 3

Site Investigation and Monitoring at 7-Eleven #13917 (3645 E. Olive Ave.), Tosco #30587 (1610 N. Palm Ave.), Valley Gas (2139 South Elm), and Beacon-Arco #615 (1625 Chestnut Ave.)

- Memorandum from Ray Bruun, Assoc. Eng'r, RWQCB, to John Noonan, Senior Eng'r, RWQCB (Aug. 5, 1998) (RWQCB-FRESNO-021554–21557) (7-Eleven #13917);
- Letter from J. Whitler & J. Auchterlonie, Fluor Daniel GTI, Inc., to Ray Bruun, RWQCB (June 27, 1997) (RWQCB-FRESNO-021558) (7-Eleven #13917);
- Pacific Envtl. Group, Inc., Soil Gas Survey Results, Unocal Service Station 3922 (Oct. 29, 1997) (FCDEH-FRESNO-029840–29847) (Tosco #30587);
- Glenn L. Matteucci, Asst. Project Manager, Envtl. Resolutions, Inc., Underground Storage Tank and Associated Piping and Dispenser Removal at Tosco 76 Service Station 3922 (Oct. 13, 1998) (FCDEH-FRESNO-030032–114) (Tosco #30587);
- ASR Eng'g, Inc., Soil Sampling and Chemical Analyses Report, Gasoline Piping Leak, Valley Gas (Nov. 29, 1999) (RWQCB-FRESNO-001258–1264);
- Letter from John D. Whiting, Eng'g Geologist, RWQCB, to M. Shahid, Petro Group II (Feb. 27, 2008) (RWQCB-FRESNO-001318–1320) (Valley Gas); and
- El Dorado Envtl., Inc., Tank Closure Report Beacon Station #615, at 3, RWQCB-FRESNO-016188 (Sept. 27, 1998) (RWQCB-FRESNO-016182–16229).

Peter M. Rooney
Secretary for Environmental Protection

California Regional Water Quality Control Board
Central Valley Region

Fresno Branch Office
Internet Address: http://www.swrcb.ca.gov/~rwqcb5/home.html
3614 East Ashlan Avenue, Fresno, California 93726
Phone (209) 445-5116 • FAX (209) 445-5910

Ed J. Schnabel
Chair

TO: John Noonan
Senior Engineer

FROM: Ray Bruun
Associate Engineer

DATE: 5 August 1998

SIGNATURE: _____

SUBJECT: ***CLOSURE SUMMARY FOR 7-ELEVEN SITE NO. 13917, 3645 EAST OLIVE AVENUE, FRESNO, FRESNO COUNTY***

Background

UST Removal - Three USTs were removed from the site in March 1992. These included two 10,000-gallon and one 5,000-gallon gasoline tanks, a dispenser island, and related piping. The dispenser island was situated above the tanks. Testing of soil samples taken from beneath the tanks resulted in gasoline concentrations (as TPH-g) from nondetect to 3,500 mg/kg. After the tanks were removed, the tank pit was filled with stockpiled soils and imported clean fill.

Soil Investigation - In October of 1992, six soil borings were drilled in the vicinity of the tank pit; three of them were converted to soil vapor extraction wells. Selected soil samples were tested in the laboratory for TPH-g and BTEX. A few of those were also tested for total lead. Two borings, VW-1 and B-1 encountered significant gasoline impacts even to depth. Test results for TPH-g, BTEX, and lead in VW-1 and B-1 are given in the table below.

Table 1 - Soil Test Results for B-1 and VW-1

Boring	Sample Depth, ft	TPH-g mg/kg	Benzene mg/kg	Toluene mg/kg	Ethyl-benzene mg/kg	Total Xylenes mg/kg	Total Lead mg/kg
B-1	16	ND	ND	ND	ND	ND	NA
	31	ND	ND	ND	ND	ND	0.51[a]
	46	17	2	2.8	0.22	1.4	NA
	51	27,000	210	1,800	480	3,000	NA
	56	230	2.4	12	3.9	18	NA
VW-1	16	16,000	60	540	200	1,900	8[a]
	31	5,400	ND	160	94	730	NA
	41	33,000	170	2,000	850	5,500	NA
	56	1,000	9.5	68	22	140	NA
	71	13	1.1	1.4	0.2	1.4	NA
	81	3.9	0.5	0.24	0.13	0.92	NA
	86	ND	0.02	ND	ND	0.05	NA

[a] Well within background variability

Significant contamination extended to at least 56 feet below the ground surface (bgs). A soil vapor

TABLE 1A
Historical Groundwater Monitoring and Analytical Data

Gosford Site No. 18917
2845 East Olive Avenue
Fresno, California

FLUOR DANIEL GTI

RWQCB-FRESNO-021557

FLUOR DANIEL GTI

June 27, 1997

Mr. Ray Bruun
California Regional Water Quality Control Board
Central Valley Region
3614 East Ashlan Avenue
Fresno, CA 93726

Subject: Status of Corrective Action Implementation and
Request for Extension
Southland Store No. 13917
3645 E. Olive Avenue
Fresno, California
Fluor Daniel GTI Project 02070 0431

Dear Mr. Bruun:

Fluor Daniel GTI, Inc. (Fluor Daniel GTI) submits this letter, on behalf of The Southland Corporation (Southland) to provide an update on activities associated with the installation and operation of a soil vapor extraction (SVE) system at the above referenced site. In the California Regional Water Quality Control Board - Central Valley Region (CRWQCB-CVR) letter dated January 6, 1997, the CRWQCB-CVR requested that a report detailing system installation and startup be submitted by March 7, 1997.

System construction was started the week of March 10, 1997 after delays in obtaining a building permit from the City of Fresno. The initial phase of construction was finished on March 14, 1997. Though scheduled in advance, PG&E was unable to bring new electric and gas service to the site until the week of June 2, 1997. The final phases of system installation are currently being conducted. Fluor Daniel GTI, on behalf of Southland, respectfully requests that the deadline for the system installation and startup report be extended until August 22, 1997. An August 22 deadline will provide sufficient time for scheduling startup with the air board, system shakedown activities, analysis of initial air samples, and report preparation.

Please contact our West Sacramento office at 916-372-4700 if you have questions or comments about this work plan.

Sincerely,
Fluor Daniel GTI, Inc.
Submitted by:

John Whitler
Hydrogeologist

Fluor Daniel GTI, Inc.
Approved by:

Jaff Auchterlonie
Lead Geologist
Project Manager

c: Mr. Bob DeNinno, Southland

request01 ltr(Sthl-32)

757 Arnold Drive, Suite D / Martinez, CA 94553 USA (510) 370-3990 FAX (510) 370-3991

FA0170437
PR0032609
PE 6398
RP

Soil Gas Survey Results

UNOCAL Service Station 3922
1610 N Palm Ave
Fresno, California

RECEIVED
JAN 27 1998
Environmental Health System

Prepared for

Tosco Marketing Company

October 29, 1997

Prepared by

Pacific Environmental Group, Inc.
2025 Gateway Place, Suite 440
San Jose, California 95110

Project 311-163.1A

PACIFIC
ENVIRONMENTAL
GROUP INC.

Sequoia Analytical
680 Chesapeake Drive, Redwood City, CA 94063, (415) 364-9600, FAX (415) 364-9233
404 N. Wiget Lane, Walnut Creek, CA 94598, (510) 988-9600, FAX (510) 988-9673
819 Striker Avenue, Suite 8, Sacramento, CA 95834, (916) 921-9600, FAX (916) 921-0100

SOIL GAS SAMPLE ANALYSIS REPORT

TOSCO BASELINE SOIL GAS SURVEY

Site Number: 3922 Date Sampled: 9/20/97 Date(s) Analyzed: 9/23/97

City / State: Fresno / CA

Analytical Results From Sequoia Analytical									
Reporting Units: µg/L									% RECOVERY
#	Sample ID	TPH - Gas	Benzene	Toluene	Ethyl Benzene	Total Xylenes	GC MTBE	GC/MS MTBE	GC Surrogate
1	T - 1	5000	95	57	17	310	2500	2000	150
2	T - 2	31	<0.50	<0.50	<0.50	0.63	11	--	136
3	D - 1	<10	<0.50	<0.50	<0.50	0.89	<2.5	--	82
4	D - 2	<10	<0.50	<0.50	<0.50	0.98	<2.5	--	86
5	D - 3	11	<0.50	<0.50	<0.50	1.5	<2.5	--	87
6	P - 1	13	<0.50	<0.50	<0.50	1.7	<2.5	--	90
7	P - 2	19	<0.50	<0.50	0.70	3.5	<2.5	--	93
8	P - 3	17	<0.50	<0.50	<0.50	1.8	<2.5	--	95
9	PD - 3	700	19	41	3.7	18	320	--	123
	Method Blank	<10	<0.50	<0.50	<0.50	<0.50	<2.5	--	93

SEQUOIA ANALYTICAL, #1271

Alan B. Kemp
Laboratory Director

FCDEH-FRESNO-029846

ENVIRONMENTAL RESOLUTIONS, INC.

TRANSMITTAL

TO: Ms. Lisa Smoot, R.E.H.S.
County of Fresno Health Services Agency
P.O. Box 11867
Fresno, California 93775

DATE: October 15, 1998
PROJECT NUMBER: 232032T2
SUBJECT: Tosco 76 Service Station 3922,
1610 Palm Avenue, Fresno, California.

FROM: Glenn L. Matteucci
TITLE: Assistant Project Manager

WE ARE SENDING YOU:

COPIES	DATED	DESCRIPTION
1	October 13, 1998	Underground Storage Tank and Associated Piping and Removal Report

THESE ARE TRANSMITTED as checked below:

[ ] For review and comment	[ ] Approved as submitted	[ ] Resubmit ___ copies for approval
[X] As requested	[ ] Approved as noted	[ ] Submit___ copies for distribution
[ ] For approval	[ ] Return for corrections	[ ] Return ___ corrected prints
[X] For your files	[ ] For distribution to regulatory agencies	

REMARKS: At the request of Tosco Marketing Company, ERI is forwarding 1 copies of the above referenced report. Please call me at (415) 392-5994 with any questions regaring the information on this report.

Glenn L. Matteucci, Assistant Project Manager

RECEIVED
OCT 19 1998
DEPARTMENT OF COMMUNITY HEALTH
ENVIRONMENTAL HEALTH SYSTEM

cc: Ed Ralston, Tosco Marketing Company
1 to ERI project file 232032T2

74 Digital Drive, Suite 6, Novato, California 94949 415-382-9105 (FAX 415-382-1856)
Lake Forest • Novato • Seattle

TABLE 1
RESULTS OF ANALYSIS OF SOIL SAMPLES
Tosco (Union) 76 Service Station 3922
1610 Palm Avenue
Fresno, California
(Page 2 of 3)

Sample ID #	Sampling Date	Depth feet	TEPHd	TPPHg	B	T	E	X	MTBE	TRPH	HVOCs	SVOCs	Total Lead
S-4.5-PL2	5/28/98	4.5	NA	ND	ND	ND	ND	ND	ND	NA	NA	NA	NA
S-4.5-PL3	5/28/98	4.5	NA	ND	ND	ND	ND	ND	ND	NA	NA	NA	NA
S-4.5-PL4	5/28/98	4.5	NA	ND	ND	ND	ND	ND	ND	NA	NA	NA	NA
S-4.5-PL5	5/28/98	4.5	NA	ND	ND	ND	ND	ND	0.30	NA	NA	NA	NA
S-20-D5	6/8/98	20	NA	6	ND	0.0055	ND	0.032	0.45	NA	NA	NA	NA
SOIL - STOCKPILE													
SP-1-(1-4)	6/2/98	NA	NA	ND	ND	ND	ND	ND	NA	NA	NA	NA	9.3
SP-2-(1-4)	6/2/98	NA	NA	ND	ND	ND	ND	ND	NA	NA	NA	NA	5.4
SP-3-(1-4)	6/2/98	NA	23	ND	ND	ND	ND	ND	NA	30	ND	ND	9.1
SP-4-(1-4)	6/2/98	NA	NA	ND	ND	ND	ND	ND	NA	NA	NA	NA	16
SP-5-(1-4)	6/8/98	NA	NA	ND	ND	0.011	ND	0.013	NA	NA	NA	NA	ND
SP-6-(1-4)	6/8/98	NA	NA	4160	21	140	59	340	NA	NA	NA	NA	5.3

Notes:

All soil results reported in parts per milligrams (ppm) unless otherwise noted.

Depth	-	Sample depth below ground surface
TPPHg	=	Total purgeable petroleum hydrocarbons as gasoline analyzed using EPA Method 5030/8015 (modified).
TEPHd	=	Total extractable petroleum hydrocarbons as diesel analyzed using EPA Method 5030/8015 (modified).
BTEX	=	Benzene, Toluene, Ethylbenzene, and total Xylenes analyzed using EPA method 8020.
MTBE	=	Methyl tertiary butyl ether analyzed using EPA method 8020.
TRPH	=	Total recoverable petroleum hydrocarbons analyyzed using EPA meathod 5520 E&F.

ASR Engineering, Inc.

GEOTECHNICAL • ENVIRONMENTAL • CONSTRUCTION TESTING

November 29, 1999 Job No. 17-99068

Mr. Jack Mendrin
West Star Environmental Inc.
4688 W. Jennifer, Suite 101
Fresno, CA 93722

Subject: Soil Sampling and Chemical Analyses Report
Gasoline Piping Leak
Valley Gas
2139 S. Elm Avenue,
Fresno, California

Dear Mr. Mendrin:

At your request, ASR Engineering, Inc. (ASR) has prepared this Report of Soil Sampling and Chemical Analyses for leaking underground pipeline within the Valley Gas located at 2139 S. Elm Avenue in Fresno, California.

SCOPE OF SERVICES

The scope of services provided by ASR included:

- Collecting a confirmation soil sample from beneath the leaking pipeline.
- Submitting the collected soil samples to a State Certified analytical laboratory for chemical analyses.
- Preparing this report.

331 West Cromwell Avenue, Suite 106 • Fresno, CA 93711 • (559) 432-3575 • Fax (559) 432-7355

269723

Sampling personnel were responsible for the protection and custody of the sample until it was relinquished. When sample custody was transferred, the respective individuals relinquishing and receiving the sample signed, dated, and recorded the time on the chain-of-custody form.

LABORATORY ANALYSES

As recommended by Mr. Yee, the collected soil sample was analyzed for Total Petroleum Hydrocarbons as Gasoline (TPH-G), Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), and Methyl-t-butyl Ether (MTBE). Chemical analysis data are attached to this report. A summary of the analysis data is presented in Table 1. The data indicate that high concentrations of gasoline hydrocarbon constituents were detected in the collected soil sample.

Sample Designation	B	E	T	X	TPH-G	MTBE
S-1, PL @ 5'	130	390	260	380	31000	920

Results in mg/Kg or parts per million (ppm)
B= Benzene
T= Toluene
E= Ethylbenzene
X= Total Xylene
MTBE= Methyl-t-Butyl Ether
TPH-G= Total Petroleum Hydrocarbons as Gasoline
ND = None Detected

LIMITATIONS

This report has been prepared in accordance with the generally accepted standards of environmental practice in the area at the time the soil sample was collected. No soil engineering or environmental implications are stated or should be inferred. Evaluation of the conditions at the site is made from a limited sampling points. Subsurface conditions may vary away from the sampling locations. The report does not reflect variations away from the sampling points.

ASR Engineering, Inc.

Linda S. Adams
Secretary for
Environmental
Protection

California Regional Water Quality Control Board
Central Valley Region
Karl E. Longley, ScD, PE, Chair

Fresno Branch Office
1685 E Street, Fresno, California 93706
(559) 445-5116 • Fax (559) 445-5910
http://www.waterboards.ca.gov/centralvalley

Arnold
Schwarzenegger
Governor

PDF 6T

FILE

27 February 2008

Regional Board Case No. 5T10000773

Mr. Mohammad Shahid
Petro Group II
37074 Mount Vernon Avenue
Fremont, California 94538

UNDERGROUND STORAGE TANK RELEASE, VALLEY GAS, 2139 SOUTH ELM AVENUE, FRESNO, FRESNO COUNTY

The Fresno County Department Of Community Health, Environmental Health Division, in a letter dated 30 January 2008, referred the subject site to this office for regulatory oversight in relation to a release of petroleum hydrocarbons from the former underground storage tank (UST) system. The documents submitted indicate that petroleum hydrocarbons were detected beneath product piping during investigation conducted during November 1999. Total petroleum hydrocarbons referenced to gasoline (TPH-g), benzene, and methyl tertiary butyl ether (MTBE) were detected at 31,000, 130, and 920 milligrams per kilogram (mg/kg), respectively. TPH-g and MTBE up to 6,022 and 164 mg/kg, respectively, were also detected beneath several fuel dispensers during an investigation during March 2004 and TPH-g and MTBE up to 3,800 and 27 mg/kg, respectively, were detected beneath dispensers and piping during February 2007. An unauthorized release from the former UST system has occurred and the extent of impacted soil is undefined.

Health and Safety Code Section 25296.10(a) states:

> *"Each owner, operator, or other responsible party shall take corrective action in response to an unauthorized release in compliance with this chapter and the regulations adopted pursuant to Section 25299.3."*

Health and Safety Code Section 25296.10(c)(1) states:

> *"When a local agency, the board, or a regional board requires an owner, operator, or other responsible party to undertake corrective action, including preliminary site assessment and investigation pursuant to an oral or written order, directive, notification, or approval issued pursuant to this section, or pursuant to a cleanup and abatement order or other oral or written directive issued pursuant to Division 7 (commencing with Section 13000) of the Water Code, the owner, operator, or other responsible party shall prepare a work plan that details the corrective action the owner, operator, or other responsible party shall take..."*

You are hereby notified that you need to submit a workplan as described in the Health and Safety Code. You are to submit a workplan to assess the extent of the release by **30 June 2008**. The workplan, in general, must comply with *Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Storage Tank*

TANK CLOSURE REPORT
BEACON STATION #615

1625 CHESTNUT AVENUE
FRESNO, CALIFORNIA
EDE PROJECT NO. U085.01

September 27, 1998

Prepared by:

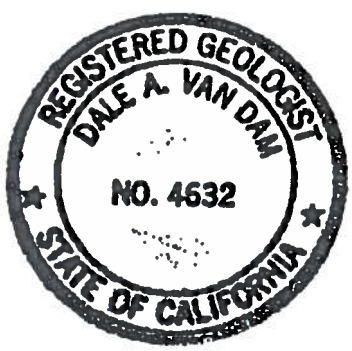
El Dorado Environmental, Inc.
2221 Goldorado Trail
El Dorado, California 95623
(530) 626-3898

PREPARED BY:

Dale A. van Dam

Dale A. van Dam, R.G.
Hydrogeologist

Date: 9/27/98



On June 11, 1998, Doulos also collected two discrete soil samples from the area of the new UST basin, near the northwest corner of the property. Both of these soil samples were collected at depths of 16 feet below grade. These samples were submitted for analysis of TPHg, BTEX, and MTBE. Results are compiled in Table 1. Copies of certified analytical reports are contained in Appendix B.

Soil samples were collected below the product piping and product dispensers at locations indicated on Figure 4. Depth of sample collection ranged from 4 to 5 feet below grade. Samples collected from beneath product piping and dispensers were also analyzed for TPHg, TPHd (selected samples only), MTBE, and BTEX. Results are compiled in Table 1. Copies of certified analytical reports are contained in Appendix B.

Soil samples collected from the bottom of the UST basin beneath the 6,000-gallon-capacity UST did not contain detectable concentrations of TPHg, TPHd, MTBE, or BTEX. MTBE was the only petroleum constituent detected in the soil sample collected from beneath the east end of the southernmost 12,000-gallon-capacity UST at a concentration of 0.011 milligrams per Kilogram (mg/Kg). TPHg was reported at concentrations of 4.6, 2.9, and 2.8 mg/Kg in samples collected at 16 and 20 feet below grade beneath the east end of the middle 12,000-gallon-capacity UST and the west end of the northernmost 12,000-gallon-capacity UST, respectively. TPHg was also detected at a concentration of 57 mg/Kg in a soil sample collected at a depth of 21 feet below grade at a location 12 feet north of the northernmost 12,000-gallon-capacity UST. Benzene was not detected in any soil sample at a concentration exceeding 1 mg/Kg. MTBE was reported at concentrations ranging from 0.011 to 81 mg/Kg.

TPHg was detected in nine of the twelve dispenser/line soil samples, at concentrations ranging from 87 to 5,600 mg/Kg. The highest concentrations of TPHg were detected in soil samples collected from near the northeast corner of the dispenser area, at locations D-2 and L-3. TPHd was detected in dispenser samples D-3 and D-4 (collected near the center of the canopy/dispenser area) at concentrations ranging from 2,000 to 12,000 mg/Kg. Benzene was present in dispenser and line samples at concentrations ranging from 0.26 to 26 mg/Kg.

3.0 STOCKPILED SOIL

A total of approximately 1,000 cubic yards of soil were generated during removal of the USTs. The soil was temporarily stockpiled on site at locations indicated on Figure 5. On June 10, 1998, Doulos collected four samples for each 50 cubic yards of the balance of the stockpiled soil and submitted the samples to Kiff for compositing and analysis of TPHg, TPHd, BTEX and MTBE. One of the composite samples was also analyzed for VOCs using EPA Standard Method 8260B.

TPHg was detected in each of the composite soil samples at concentrations ranging from 4.0 to 2,500 mg/Kg; TPHd was present in 9 of the 10 composite soil samples at concentrations ranging from 3.7 to 3,200 mg/Kg. Benzene was detected in stockpiled soil samples ranging from <0.0050 to 16

Table 1. Soil Sample Analytical Results, June 10 and 11, 1998
UST Basin, Product Line Piping, and Dispensers,
Beacon Station #615, 1625 Chestnut Avenue, Fresno, California
(results in milligrams per Kilogram)

Sample Identification	Depth[1]	TPHg[2]	TPHd[3]	Benzene	Toluene	Ethyl-benzene	Total Xylenes	MTBE[4]
Tank #1 W End 15'	15	<1.0	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Tank #1 E End 15'	15	<1.0	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Tank #2 W End 16'	16	<1.0	NA[5]	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Tank #2 E End 16'	16	<1.0	NA	<0.0050	<0.0050	<0.0050	<0.0050	0.011
Tank #3 W End 16'	16	<1.0	NA	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Tank #3 E End 16'	16	4.6	NA	<0.0050	<0.0050	<0.0050	0.42	0.73
Tank #4 W End 16'	16	2.9	NA	0.012	0.024	<0.0050	0.023	3.4
Tank #4 W End 20'	20	2.8	NA	0.012	0.021	<0.0050	0.024	2.0
Tank #4 E End 16'	16	<1.0	NA	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
12'N of Tank 4 21'	21	[illegible]	NA	0.60	2.0	<0.20	1.0	81
New Ex. N End 16'	16	<1.0	NA	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
New Ex. S End 16'	16	<1.0	NA	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
D-1 5'	5	<1.0	NA	<0.0050	<0.0050	<0.0050	<0.0050	0.0098
D-2 5'	5	[illegible]	NA	26	370	140	810	[illegible]
D-2 10'	10	[illegible]	NA	2.2	140	42	380	66
D-3 5'	5	810	2,000	0.26	3.7	7.9	56	1.1
D-3 10'	10	430	4,000	0.44	2.1	5.7	42	1.0
D-4 5'	5	1,000	12,000	0.66	0.63	7.7	43	2.0
D-4 10'	10	840	9,900	<0.20	0.46	3.4	25	1.4
D-5 5'	5	<1.0	NA	<0.0050	<0.0050	<0.0050	<0.0050	0.013
D-6 5'	5	<1.0	NA	<0.0050	<0.0050	<0.0050	0.023	<0.0050
L-1 5'	5	<1.0	<1.0	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
L-2 5'	5	87	NA	<0.020	0.046	0.032	0.36	0.10
L-3 5'	5	660	NA	0.26	2.4	4.1	34	1.7
L-4 5'	5	310	NA	<0.20	0.30	1.3	12	2.4

VOC's 8260B

ND

Depth[1] = Approximate Depth of Sample Collection in Feet Below Grade.
TPHg[2] = Total Petroleum Hydrocarbons as Gasoline.
TPHd[3] = Total Petroleum Hydrocarbons as Diesel.
MTBE[4] = Methyl-tertiary-butyl ether.
NA[5] = Sample Not Analyzed for this Constituent.