OKLAHOMA ENVIRONMENTAL SERVICES

Underground Storage Tank (UST) cleanup costs depend on several factors, including the extent of the contamination and the cleanup standards set by the state. According to the United States Environmental Protection Agency UST Section, the average cleanup costs are as follows; Average Site Cleanup - $130,000, Small Cleanup - $10,000, Leaks Impacting Groundwater - $100,000 to over $1 Million.

Fortunately, owners and operators aren't powerless in stopping a release, spill, or overfill from occurring. It is easier and far more cost-effective to implement and uphold a preventive maintenance process to protect your site and your bottom line. Below are some quick tips on what practices will have the most impact:

- Monitor all fuel deliveries from start to finish
- Know how to properly respond to alarms
- Periodically review emergency response procedures with employees
- Check spill basins and sumps for liquid and debris. Remove immediately
- Perform routine walkthroughs, including a visual check of dispensing components. Make sure hoses, nozzles, and filters are operating effectively
- Maintain appropriate leak detection and corrosion protection records, as required

The required 30-day walkthrough inspections are a good opportunity to perform preventative maintenance as well as discover leaks. Below are the requirements for the 30-Day and Annual walkthrough inspections.

30 Day Walkthrough Inspections

- Check spill prevention equipment for damage and remove any liquid or debris
- Check fill pipe for obstructions
- Check fill cap to ensure it is secure and seals on the fill pipe
- Check interstitial monitoring are for leaks, if applicable
- Check release detection equipment to ensure it is operating properly with no alarms
- Review release detection records and ensure they are being kept current

Annual Walkthrough Inspections

- Check containment sumps for damage and leaks within the containment area; check for releases to the environment
- Remove liquid or debris found in containment sumps
- Check double-walled containment sumps for leaks in the interstitial area, if applicable
- Check hand-held release detection equipment (i.e. groundwater bailers or tank gauge sticks)

U.S. Convenience Store Count Stands at 153,237 Stores

Mergers and acquisitions continue to be a key trend in the convenience store channel

There are 153,237 convenience stores operating in the United States, a 1.1% decline from last year's record of 154,958 stores, according to the 2019 NACS/Nielsen Convenience Industry Store Count. The count is based on stores as of December 31, 2018. The decrease in stores was fueled by a 2,198-store decline in single-store operators, which still account for 62.3% of all convenience stores (95,445).

The convenience store count accounts for more than one third (34.4%) of the brick-and-mortar retail universe tracked by Nielsen in the United States. Except for the dollar store channel, all other major channels had fewer units at year-end 2018:

Channel	2018	2017	Unit Change	% Change
Convenience store	153,237	154,958	(1,721)	-1.1%
Grocery	49,842	51,134	(1,292)	-2.5
Drug	41,833	43,169	(1,336)	-3.1
Dollar	31,620	30,332	1,288	4.1
All other brick-and-mortar stores	169,107	171,347	(2,240)	-1.3

A key trend within the U.S. convenience and fuel retailing industry continues to be strong mergers and acquisitions activity, particularly among existing convenience store chains. Like 2017, the industry experienced historically large M&A deals in 2018, but also saw new entrants to the U.S. market from global companies based in Chile and the United Kingdom, for example.

"With expanded competition for the convenience customer and an active M&A environment, retailers increasingly need to up the ante on delivering a quick and exciting shopping experience by investing in their core offer of convenience. "With one in seven stores getting remodeled every year at a cost of $400,000, that can put pressure on some stores whether to modernize operations or exit the business," said NACS Vice Chairman of Research Andy Jones, who is president and CEO of Spirit Food Stores Inc. (Wrens, GA).

Consumers are redefining what convenience means to them, and as a result, today's retailers must be extremely tuned into the wants and needs of the individual consumer," said Jeff Williams, senior vice president of retail services at Nielsen. "Convenience players will need to continue to seek growth opportunities amid a fiercely aggressive environment, whether that's through exploration of frictionless payment methods, piloting more efficient retail layouts, expanding private label programs, increasing food service offerings, or a move toward building an omnichannel presence. That said, as the value of convenient shopping experiences continues to grow in importance, convenience as a channel must play into its true strengths and optimize to be the retail channel that best serves the needs of on-the-go consumers, on a personal level."

The number of convenience stores that sell motor fuels decreased 0.5% (554 stores) to 121,998 stores, which is 79.6% of all convenience stores. Overall, convenience stores sell approximately 80% of the motor fuels purchased in the United States. The decline in the number of convenience stores selling fuel is reflective of retailers evolving their business models to focus more on the in-store, foodservice offer, as well as retailers embracing new store formats and establishing their brands in more urban, walk-up locations.

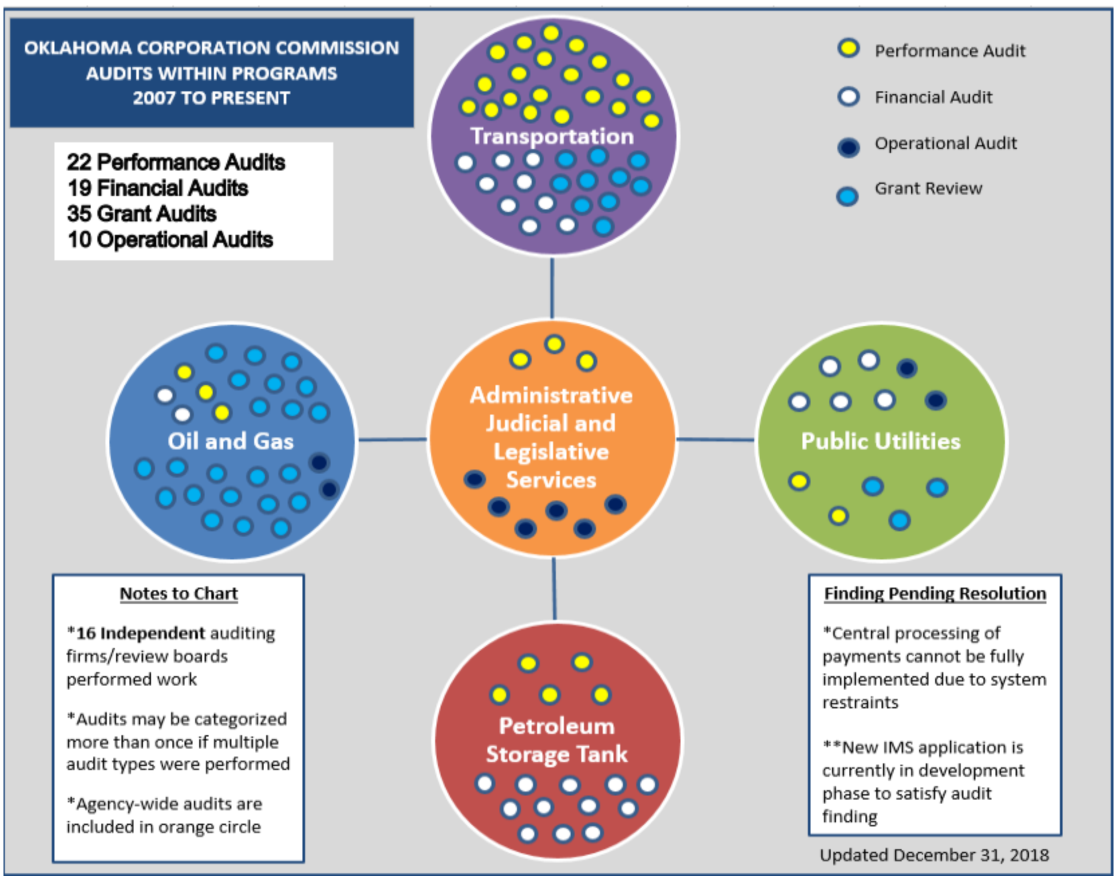
U.S. Convenience Store Count Stands at 153,237 Stores (continued)

Among the states, Texas continues to lead in store count at 15,745 stores, or more than one in 10 stores in the country. California is second at 11,930 stores, followed by Florida (9,803), New York (8,550), Georgia (6,698), North Carolina (6,069), Ohio (5,637), Michigan (4,930), Pennsylvania (4,778) and Illinois (4,753). The bottom three states in terms of store count are Alaska (200 stores), Wyoming (352) and Delaware (346).

Looking at the last five years (2013-2018), the top three states—Texas (+554), California (+742) and Florida (+66)—have increased their store count by a combined 1,362 stores, with the growth mostly coming from larger convenience store chains with 500 or more stores. The bottom three states (Alaska, Wyoming and Delaware) have remained relatively unchanged.

The U.S. store count has risen 28.3% since 2000. This year marks only the fourth time the U.S. convenience store count has declined during that time.

Oklahoma Corporation Commission Reduces Number of Divisions



Fiscal Year 2018 OCC Petroleum Storage Tank (PST) Division Highlights

• 19 Fuel specialists performed 4,912 service station inspections, 74,072 pump calibrations, Discovered and prevented the sale of fuel from 311 water contaminated tanks and investigated 170 consumer complaints • PST activated 173 new release cases • PST closed 118 release cases • Streamlined application system, resulting in time and cost savings
http://www.oksenate.gov/Committees/Cmte_Meeting_Notices%20-%202019/appropriations/CORP%20COMM%20a%20Budget%20Meeting%2024Jan19.pdf

OCC JURISDICTION

3,000 Oil and gas well operators • 8 Electric utility companies • Wind power companies • 8 Gas utility companies • Transportation network companies (Uber, Lyft, etc.)• 367 Telephone companies • 10 Water companies • 25 Cotton gins • 249 Natural gas pipeline operators and 32 hazardous liquid pipeline operators operating over 40,000 miles of pipeline • 24 Railroads with over 4,100 public at-grade crossings • 7,473 For-hire and private motor carriers authorized to operate in intrastate commerce • Non-consensual wrecker service • 12,150 Petroleum storage tanks currently in use and 36,000 motor fuel dispensers • 2,925 active retail fueling stations

Record-Breaking Settlement in Visa, Mastercard Antitrust Case

Merchants seek compensation for excessive credit- and debit-card interchange fees.
Reprinted NACS 02/25/19

BROOKLYN, N.Y. - The U.S. District Court for the Eastern District of New York has announced the settlement of a lawsuit charging Visa and Mastercard, along with certain banks, with violation of antitrust laws that caused merchants to pay excessive fees for accepting credit and debit cards.

Visa and Mastercard say they've done nothing wrong and the Court has not decided who is right, but the parties have agreed to a settlement. A Court hearing will be held on Nov. 7, 2019 to decide whether to approve that settlement.

Visa, Mastercard and the bank defendants have agreed to provide approximately $6.24 billion in class settlement funds, making this the largest antitrust class-action settlement in history. After deducting court-awarded attorneys' fees and costs, the net class settlement fund will be used to pay valid claims from merchants that accepted Visa or Mastercard credit or debit cards at any time between Jan. 1, 2004 and Jan. 25, 2019.

According to legal rights and options, merchants may:

- Exclude themselves from the Settlement Class, which means they will not receive any money from this settlement but can individually sue the defendants on their own and at their own expense. To do so, merchants must make a written request, place it in an envelope and mail it with postage prepaid and postmarked no later than July 23, 2019, or send it by overnight delivery for arrival by July 23, 2019, to Class Administrator, Payment Card Interchange Fee Settlement, P.O. Box 2530, Portland, OR 97208-2530.
- Object to the settlement. The deadline to object is July 23, 2019. To learn how to object, visit www.PaymentCardSettlement.com or call 1-800-625-6440. Note: Merchants who exclude themselves from the Settlement Class cannot object to the settlement.
- File a claim to seek payment. To receive payment, merchants will be required to fill out a claim form. Claims cannot yet be filed until the Court approves the proposed settlement. If it is approved, the Court will approve a claim form and set a claim deadline. Claim forms will then be mailed to all identified merchants. When the time comes to file claims, merchants can submit them via mail or email, or may file online at www.PaymentCardSettlement.com.

For more information, visit: www.PaymentCardSettlement.com. Members of the Settlement Class who do not exclude themselves by the deadline will be bound by the terms of this settlement. Under the settlement, merchants who submit timely, valid claims will receive a pro rata share based on the interchange fees attributable to their transactions during the class period, i.e., Jan. 1, 2004, and Jan. 24, 2019. If more than 25% of class members opt-out of the class, the defendants will have the ability to terminate the settlement.

The Nov. 7 Court hearing also will address the requests for attorneys' fees and expenses, and awards for the Class Plaintiffs for their representation of merchants in MDL 1720. The hearing will take place at:
United States District Court for the Eastern District of New York, 225 Cadman Plaza, Brooklyn, NY 11201

Members of the Settlement Class do not have to attend the Court hearing or hire an attorney, but they may attend at their own expense. The Court has appointed the law firms of Robins Kaplan LLP, Berger Montague PC, and Robbins Geller Rudman & Dowd LLP as Rule 23(b)(3) Class Counsel to represent the Rule 23(b)(3) Settlement Class. For more details about this case, call toll-free at 1-800-625-6440 or visit www.PaymentCardSettlement.com. Members also may write to the Class Administrator at Payment Card Interchange Fee Settlement, P.O. Box 2530, Portland, OR, 97208-*2530* or email info@PaymentCardSettlement.com.