

**HITP - 28**

**GENERAL  
CORRESPONDENCE**

**YEAR(S):  
2012-2013**



**CONESTOGA-ROVERS  
& ASSOCIATES**

2135 S. Loop 250 West  
Midland, Texas 79703  
Telephone: (432) 686-0086 Fax: (432) 686-0186  
www.CRAworld.com

**TRANSMITTAL**

DATE: 26 ~~03~~ March 2012 REFERENCE NO.: 077968

PROJECT NAME: NOI\_GPM Eunice Lateral

TO: Mr. Brad Jones  
New Mexico Oil Conservation Division  
1220 S. St. Francis Dr.  
Santa Fe, NM 87505

2012 MAR 28 A 7:35  
RECEIVED OGD

Please find enclosed:  Draft  Final  
 Originals  Other NOI  
 Prints

Sent via:  Mail  Same Day Courier  
 Overnight Courier  Other

QUANTITY	DESCRIPTION
1	Original NOI
2	Copies of NOI

As Requested  For Review and Comment  
 For Your Use

COMMENTS:  
Dr. Hoy Bryson, PG 432-686-0086  
Conestoga-Rovers & Associates, Midland, Texas

Copy to: \_\_\_\_\_

Completed by: Hoy Bryson  
[Please Print]

Signed:

Filing: Correspondence File

**K. D. (Kent) Mathews**  
Environmental Specialist

**Health, Environment &  
Safety**

Chevron Pipe Line Company  
4800 Fournace Place W228A  
Bellaire, TX 77401  
Tel 713-432-3424  
Fax 713-432-3477  
kentmathews@chevron.com

March 22, 2012

Mr. Brad Jones  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Dear Mr. Jones:

**Re: NOTICE OF INTENT (NOI)**  
**Chevron Pipe Line Company**  
**Hydrostatic Test Dewatering**  
**Existing LPG Pipeline Segment – *GPM Eunice Lateral***  
**Lea County, New Mexico**

2012 MAR 28 A 7:37  
RECEIVED OCD

Chevron Pipe Line Company (CPL) hereby provides Notice of Intent (NOI) to the New Mexico Oil Conservation Division (OCD) for Hydrostatic Test Dewatering of an existing 6-inch diameter lateral pipeline, approximately 1.7 miles in length. Following the hydrostatic test, approximately 13,000 gallons (~ 315 barrels [bbls.]) of clean, potable-sourced test water will be removed from the pipeline and transferred directly into a “frac” tank<sup>1</sup>. The test water then will be transferred from the frac tank to tanker trucks that will transport it to a facility permitted by the OCD for disposal. No discharge of test water to soils or other environmental media – such as groundwater or surface water -- will occur.

The hydrostatic test is projected to commence in April, 2012, with an expected duration of approximately one week -- from mobilizing equipment to demobilizing from the site.

The test water will be transferred directly into the frac tank and will be disposed at a properly permitted facility. Thus, there will be no opportunity for water pollution, as defined by Subsection CCC of §20.6.2.7 NMAC. The hydrostatic test water is a substance NOT defined as a waste by the Resource Conservation and Recovery Act. However, should a spill or release of hydrostatic test water occur inadvertently, that circumstance will be addressed aggressively according to requirements of the New Mexico Administrative Code (NMAC) Title 19, Chap. 15, Parts 29 and 30, and the OCD guidance document titled *Guidelines for Remediation of Leaks, Spills and Releases* (August 13, 1993).

<sup>1</sup> An approximately 500 bbl. tank often used to contain water, etc., used for hydraulic fracturing (“frac”-ing) petroleum-containing geologic strata.

**BACKGROUND**

The GPM Eunice Lateral is a northeast-southwest trending pipeline located in Lea County, approximately 8.5 miles northwest of the City of Eunice. Constructed in 1995, the 6-inch diameter, approximately 1.7-mile long pipeline was used to transport liquefied petroleum gas, only. However, it was idled several years ago, when it was purged and filled with nitrogen gas. The purpose for hydrostatic testing is to ensure integrity prior to reactivating the lateral for future service.

**RESPONSES TO OCD GUIDELINES QUERIES**

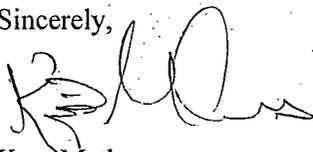
In support of this NOI to remove and dispose approximately 13,000 gallons of water used to hydrostatically test the GPM Eunice Lateral, CPL herewith provides the information requested in the *GUIDELINES FOR HYDROSTATIC TEST DEWATERING* (Rev. Jan. 11, 2007) in an ATTACHMENT to this correspondence.

A check, payable to the Water Quality Management Fund, in the amount of \$100.00 to cover the filing fee is enclosed with this submittal. CPL understands an additional fee will be required prior to issuance of the discharge permit. CPL will await further notification from OCD concerning the permit fee amount to be submitted.

At CPL's request, Conestoga-Rovers & Associates (CRA) prepared this submittal. Should any further information be required or if there are questions regarding the proposed hydrostatic test dewatering or the information provided, please contact Dr. Hoy Bryson, CRA, by phone at 432-686-0327 or via email at [hbryson@croworld.com](mailto:hbryson@croworld.com).

Thank you for your attention to this NOI submittal.

Sincerely,



Kent Mathews  
Environmental Specialist

ATTACHMENT and ENCLOSURE

**ATTACHMENT**

**Chevron Pipe Line Company  
Notice of Intent  
Hydrostatic Test Dewatering  
Existing LPG Pipeline Segment – *GPM Eunice Lateral*  
Lea County, New Mexico**

The following provides the information requested in the *GUIDELINES FOR HYDROSTATIC TEST DEWATERING* (Rev. Jan. 11, 2007).

***Item a. Name and address of the proposed discharger.***

Chevron Pipe Line Company  
Operator, GPM Eunice Lateral Pipeline  
4800 Fournace Place  
Bellaire, TX 77401

Mr. Mike Eaton  
Project Coordinator  
Chevron Pipe Line Co.  
15 Smith Rd., Claydesta Plaza  
Midland, TX 79705

***Item b. Location of the discharge, including a street address, if available, and sufficient information to locate the facility with respect to surrounding landmarks.***

The southwest terminus of the GPM Eunice Lateral pipeline (the "Lateral") is at the DCP Eunice Gas Plant (the "Plant"), within a 100' X 100' fenced area (referred to herein as the "Water Removal Location") adjacent the eastern fenceline of the Plant proper. The hydrostatic test water will be removed from the Lateral and transferred into a 500 bbl. frac tank stationed in the Water Removal Location. The Water Removal Location centers on coordinates N 32° 30' 49.88", W 103° 16' 44.23", in Section 5, Unit I, T21S, R36E.

The DCP Eunice Gas Plant is located approximately two (2) miles northwest of the Town of Oil Center, New Mexico. To reach the Plant, travel north from Oil Center on Highway 8 approximately 0.65 miles to the intersection with Highway 175. Turn left (west-northwest) on Highway 175 and travel approximately 1.4 miles to the Plant, located on the north side of the highway. The pipeline segment to be tested terminates within a fenced area approximately 100' X 100' in size, located outside and adjacent to the fenceline near the southeast corner of the Plant. This fenced Water Removal Location can be accessed from a north-south trending caliche oilfield road paralleling the east side of the Plant and connecting to Highway 175 at its southern extremity.

**Item c. Legal description of the discharge location.**

As described previously, the Water Removal Location for the hydrostatic test water is immediately adjacent the DCP Eunice Gas Plant -- specifically in Section 5, Unit I, T21S, R36E, with coordinates centering at N 32° 30' 49.88", W 103° 16' 44.23".

**Item d. Maps (site specific and regional) indicating the location of the pipelines to be tested and the proposed discharge location.**

A General Area Map is provided as Figure 1a, and a Site Specific Map is provided as Figure 1b – each map depicting the Water Removal Location, the GPM Eunice Lateral and the DCP Eunice Gas Plant.

**Item e. A demonstration of compliance to the following siting criteria or justification for any exceptions:****i. Within 200 feet of a watercourse, lakebed, sinkhole or playa lake.**

There is no watercourse, lakebed, sinkhole, pit, pond or playa lake located within 200 feet of the Water Removal Location.

According to the New Mexico Pit Rule Mapping Portal (the "Pit Rule Mapping Portal"), the nearest surface waterbodies are two closely-associated process water pits located to the northwest -- within the DCP Eunice Gas Plant -- approximately 800 and 1,200 feet from the Water Removal Location (See Figure 2). However, aerial imagery of the Plant, dated 2004, appears to confirm that the largest and nearest pit has been reclaimed. The smaller pit – about 1,200 feet away – appears to be functional in the 2004 imagery. Notably, both pits are shown on the 1985 and 2010 editions of the *Monument South, New Mexico* 7.5-minute USGS Topographic Quadrangle maps.

**ii. Within an existing wellhead protection area or 100-yr floodplain.**

The Water Removal Location is not within an existing wellhead protection area, as defined by NMAC Title 19, Chapter 15, Part 2.7.W(8). Under the most conservative interpretation of this rule, the Water Removal Location would need to be positioned within 1,000 feet of a water supply well to be considered within the wellhead protection area.

The Water Removal Location is positioned very near the boundary between Sections 4 and 5, T21S, R36E. Consequently, a search radius of 1,000 feet is completely contained within those two sections (See Figure 3). The New Mexico Office of the State Engineer ("NMOSE") Waters Database lists two (2) wells in Section 4 and one (1) in Section 5 (See Figure 3), as follows:

<u>WR File #</u>	<u>Location</u>	<u>Owner</u>
CP 00694	NW¼ Section 4**	Chevron USA, Inc.
CP 00697	SW¼, NE¼, SE¼ Section 4	Chevron USA, Inc.
CP 00670	NW¼, SE¼, SE¼ Section 5	Gulf Oil Corporation.

\*\* The well is assumed to be positioned at the center of the NW quadrant of Section 4.

All three of the wells listed above are intended to provide water for petroleum exploration and production activities, and none is intended for domestic or agricultural purposes. A copy of the NMOSE *Currently Active Points of Diversion* (PODs) listing for Sections 4 and 5 is provided in APPENDIX A. As

demonstrated by Figure 3, all three wells lie outside a search radius of 1,000 feet from the Water Removal Location.

Neither the Lateral nor the Water Removal Location lies within a 100-year floodplain.

The Federal Emergency Management Agency (FEMA) posts a website providing access to GIS mapping of flood zones (<http://www.fema.gov>). This website was examined for the area of the Lateral and the Water Removal Location. Both were determined to lie totally within the FEMA Panel "35025C1500D (12/16/2008) mapping unit (See Figure 4). The FEMA Panel number "35025C1500D is preceded by an asterisk (\*), indicating that the area depicted is entirely in Zone "D". FEMA Zone "D" mapping designates that the area does NOT contain a regulatory floodplain.

*iii. Within, or within 500 feet of a wetland.*

The Water Removal Location is not within, or within 500 feet of a wetland.

The U.S. Fish & Wildlife Service, National Wetlands Inventory mapping system website was accessed for the general area of the Water Removal Location. No wetland was mapped at or within 500 feet of the Water Removal Location (See Figure 5).

Also, The U.S. Department of Agriculture publication *Soil Survey of Lea County, New Mexico* (January 1974) was reviewed. The soil mapping unit containing the Water Removal Location, the complete DCP Eunice Gas Plant and the surrounding area is designated "BE" (See Figure 6). The soil identified by the mapping symbol "BE" is the Berino-Cacique fine sandy loam association. The Berino-Cacique fine sandy loam association soil is NOT listed as a hydric soil in New Mexico. A soil must be listed as hydric to support a classification of an area as being a jurisdictional wetland. This further supports the determination that the Water Removal Location is not within a wetland or within 500 feet of a wetland.

*iv. Within the area overlying a subsurface mine.*

The Water Removal Location is not within the area overlying a subsurface mine.

The Pit Rule Mapping Portal was accessed with the "Mines and Minerals" layer engaged. A single "mine" was indicated in the general area of the Plant. This "surface mine", located approximately 2,500 feet southwest from the Water Removal Location, is in actuality a quarry -- otherwise referred to as a caliche pit (See Figure 7). No subsurface mine was indicated in the general area of the Plant on the Pit Rule Mapping Portal.

The 1985 and 2010 editions of the *Monument South, New Mexico* 7.5-minute USGS Topographic Quadrangle maps were reviewed. These maps indicate only the caliche pit described in the preceding, and as illustrated on Figure 7, in the general area of the Plant. No subsurface mine was indicated to be in the area.

The New Mexico Abandoned Mine Lands Program GIS website titled *Mines, Mills and Quarries Web Map* was accessed for information concerning abandoned underground mines in the area of the Plant. The website depicted no mines of any description in the area of the Plant (See Figure 8).

*v. Within 500 feet from the nearest permanent residence, school, hospital, institution or church.*

An aerial photograph of the Plant and surrounding area, dated April 2011, was obtained to form the base imagery for Figure 9. As illustrated by attached Figure 9, there are no structures of any kind (including permanent residence, school, hospital, institution or church) within 500 feet of the Water Removal Location that are not part of the DCP Eunice Gas Plant. The 1985 and 2010 editions of the *Monument South, New Mexico* 7.5-minute USGS Topographic Quadrangle maps also were reviewed. These maps depict no structures in the area, except those associated with the Plant and with exploration and production of petroleum.

***Item f. Brief description of the activities that produce the discharge.***

CPL proposes to conduct a hydrostatic test of a currently idled 6-inch diameter carbon steel pipeline segment, approximately 1.7 miles in length. This test will be conducted to qualify the pipeline for PIM (pipeline integrity management) and re-commission the line for active service. The segment of pipeline was constructed in 1995. Previously it was in LPG (liquefied petroleum gas) service, but several years ago it was idled with a nitrogen blanket installed. The pipeline will be returned to LPG (liquefied petroleum gas) service after completion of the hydrostatic test.

Before filling with fresh potable water, the pipeline segment will be pressurized with air to verify a tight, closed system. Water will be introduced into the pipeline directly from a water supply truck, and the air will be bled out. After being filled with water, a constant predetermined pressure will be held according to the hydrostatic test plan to determine the maximum allowable operating pressure. If a pressure failure occurs during the test (*i.e.*, loss of pressure signifying a breach or hole in the pipeline), the pressure will be reduced and the suspect section of pipeline repaired or replaced -- then retested. Upon completion of the hydrostatic test, the water will be "pigged" from the pipe, and the pipeline will be dried prior to re-commissioning.

***Item g. Method and location for collection and retention of fluids and solids;***

Hydrostatic test water will be obtained from a potable source at the DCP Eunice Gas Plant and delivered by tanker truck to the Water Removal Location (adjacent to the Plant). Fill hoses will be connected from the tanker truck directly to a pipeline fitting, through which the water will be injected into the Lateral. Following completion of the hydrostatic test, the contained water will be pushed from the pipe into a 500-barrel (20,000-gallon) frac tank stationed at the Water Removal Location. CPL will locate the frac tank within 50' of the pipeline. The test water will be held in the frac tank only as long as necessary. Then it will be transferred to tanker trucks for transport to Sundance Services, Inc.-- an OCD-licensed disposal facility located on Hwy 176 approximately 15.6 miles west of the City of Eunice. During all water transfer activities, operations will be monitored carefully, and water movement will be shut down if a spill or release appears imminent.

***Item h. Brief description of best management practices to be implemented to contain the discharge onsite and to control erosion;***

No hydrostatic test water will be discharged to the ground, therefore no BMPs for sediment and erosion control will be necessary. CPL will locate the frac tank on a spill liner for secondary containment. Temporary hoses to transfer the water from the pipe to the frac tank, and from the frac tank to tanker trucks will be in good condition. The hoses will be inspected regularly for cracks and breaks, and to identify loose fittings and connectors. Drip pans and pots will be used, as necessary, at hose connections to collect leakages and drips when disconnecting hoses. CPL conducts daily JSAs (job safety analyses),

hazard assessments, and safe work permitting prior to performing any task to promote incident free operations.

***Item i. Request for approval of an alternative treatment, use, and/or discharge location (other than the original discharge site), if necessary.***

There are no alternative treatments or discharge locations proposed.

The Water Removal Location is situated at the most practicable, available valve station along the pipeline segment to be tested. Alternatives are deemed unnecessary, because no test water will be discharged to the ground where it could be possible for impacts to surface water and/or groundwater to occur. However, should the test water be classified as a hazardous waste, CPL will obtain a temporary hazardous waste generator identification number and dispose of the test water at a RCRA-permitted disposal facility. The name and address of the disposal facility and documentation for the proper disposal of the water will be provided to OCD, if this situation arises.

***Item j. Proposed hydrostatic test wastewater sampling plan.***

A grab sample of the hydrostatic test water will be collected from the frac tank in a laboratory-supplied container. The sample will be submitted to a certified laboratory for RCRA hazardous waste characterization, plus any other analyses prescribed by the disposal facility.

***Item k. Proposed method of disposal of fluids and solids after test completion, including closure of any pits, in case the water generated from test exceeds the standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations);***

As described previously, the hydrostatic test water will be transferred directly from the Lateral into a 500 bbl. frac tank. It then will be transferred from the frac tank to tanker trucks for transport off-site. All test water will be transported to the Sundance Services, Inc. disposal facility, which is properly licensed by OCD. Basic Energy Services is a Chevron-approved vendor for transportation and is an authorized transporter for hauling water in New Mexico (Order No. C133-14). An alternative hauler for the water would be Key Energy Services, LLC (Order No. C133-134).

There will be no discharge of hydrostatic test water. No test water will threaten groundwater quality, due to no opportunity to migrate into and through the soil. No pit(s) or pond(s) will be utilized in the test water handling process. No ponds or pits are present at the Water Removal Location.

***Item l. Brief description of the expected quality and volume of the discharge.***

Based on the diameter and length of the pipeline segment, approximately 13,000 gallons (approximately 315 bbls.) of water is expected to be used during the test. The test water is expected to have measurable but minimal hydrocarbon contamination, based on previous analyses of hydrostatic test water from various pipelines formerly in LPG service. None of the previous test waters have exhibited hazardous waste characteristics. Benzene concentrations have ranged from less than 0.01 mg/l to 0.1 mg/l. Total petroleum hydrocarbons are expected to range from 1 mg/l to 5 mg/l. Suspended solids are expected, due to internal pipeline scale/rouge dislodged during the filling and removal of the hydrostatic test water.

**Item m. Geological characteristics of the subsurface at the proposed discharge site.**

The Pit Rule Mapping Portal was accessed with the “New Mexico Geology” and the “USGS Karst Map” layers engaged. No karst geology was mapped for the general area of the Plant. However, the broad general area at and around the Plant was labeled with the surficial geology identifier “Qe/Qp”. The following describes these surficial geology identifiers, according to the *Geologic Map of New Mexico*, 2003, New Mexico Bureau of Geology and Mineral Resources:

- Qe Eolian deposits (Holocene to middle Pleistocene).
- Qp Piedmont alluvial deposits (Holocene to middle Pleistocene) – includes deposits of higher gradient tributaries bordering major stream valleys, alluvial veneers of the piedmont slope, and alluvial fans. May locally include upper Pliocene deposits.

As stated previously, The U.S. Department of Agriculture publication *Soil Survey of Lea County, New Mexico* identifies the soils at the Plant and surrounding area as the Berino-Cacique fine sandy loam association. This association consists of nearly level and gently sloping, well-drained soils on uplands in the southern part of Lea County. These soils are on plains in the “sand country”. The Berino soils are deep fine sands, while the Cacique soils have indurated caliche around a depth of 28 inches. These soils have moderately rapid permeability. Runoff is very slow. Water intake is rapid”. In summary, these are sandy soils that exhibit rapid infiltration and are not subject to being easily eroded by overland flow.

**Item n. The depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge.**

The depth to groundwater is approximately 52 feet below ground surface (bgs) in the area of the DCP Eunice Gas Plant.

The NMOSE website titled *New Mexico Water Rights Reporting System* was accessed to obtain driller reports for the three water supply wells listed above in Item e.ii. – which are the wells nearest the Water Removal Location. However, no driller’s report was available in the POD for any of these three wells (See APPENDIX A).

The Pit Rule Mapping Portal was accessed with the “Statewide Wells” layer engaged. This website displayed the location of the nearest water supply well with “depth to water” (DTW) information indicated. Designated “LRG 03952”, that well is in the NE¼, Section 6, T21S, R36E – approximately 2,400 meters northwest from the Water Removal Location. The depth to groundwater in the well was 52 feet bgs.

Total dissolved solids (TDS) concentrations in groundwater were not available for the wells near the Plant. Therefore, the contract engineering firm for the City of Eunice was contacted to obtain information concerning TDS in the municipal water supply. Mr. Clayton Ten Eyck, Molzen Corbin Engineers, reported the average TDS to be 451 mg/L. No other data for total dissolved solids in the immediate area of the proposed hydrostatic test dewatering is available from reasonably ascertainable sources.

*Item o. Identification of landowners at and adjacent to the discharge and collection/retention site.*

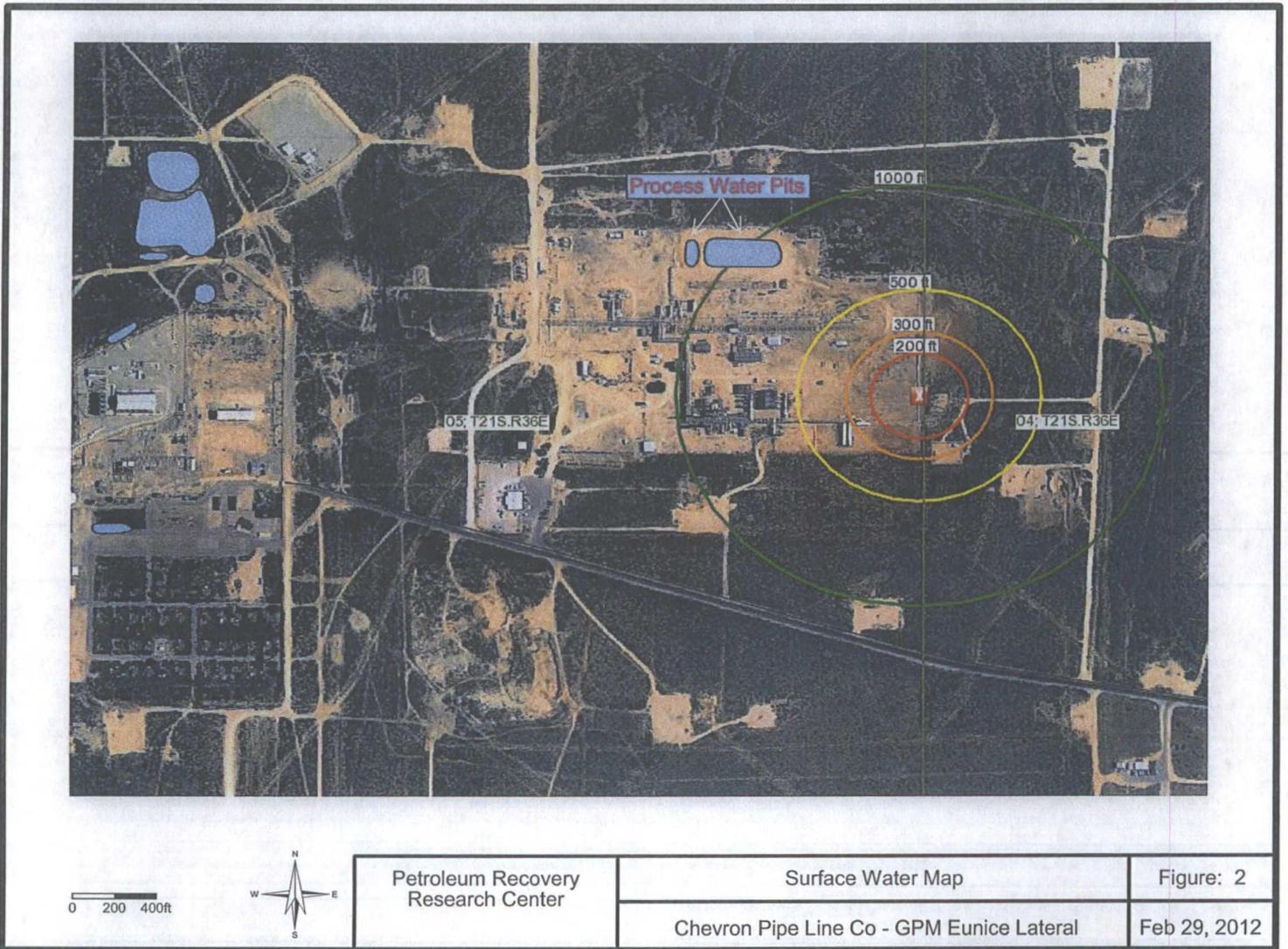
As described previously, all dewatering of the Lateral will be conducted at the Water Removal Location. The Water Removal Location is a fenced 100' X 100' parcel of land held in a leasehold by Chevron Pipe Line Company. The lessor of the parcel of land is the State of New Mexico, and the lease is administered by the New Mexico State Land Office (SLO). The DCP Eunice Gas Plant property lies immediately adjacent and west of the Water Removal Location. The Plant is owned and operated by DCP Midstream, LLC. All remaining property surrounding the Water Removal Location is owned by the State of New Mexico.



**Figure 1a**  
**General Area Map**



**Figure 1b**  
**Site Specific Map**



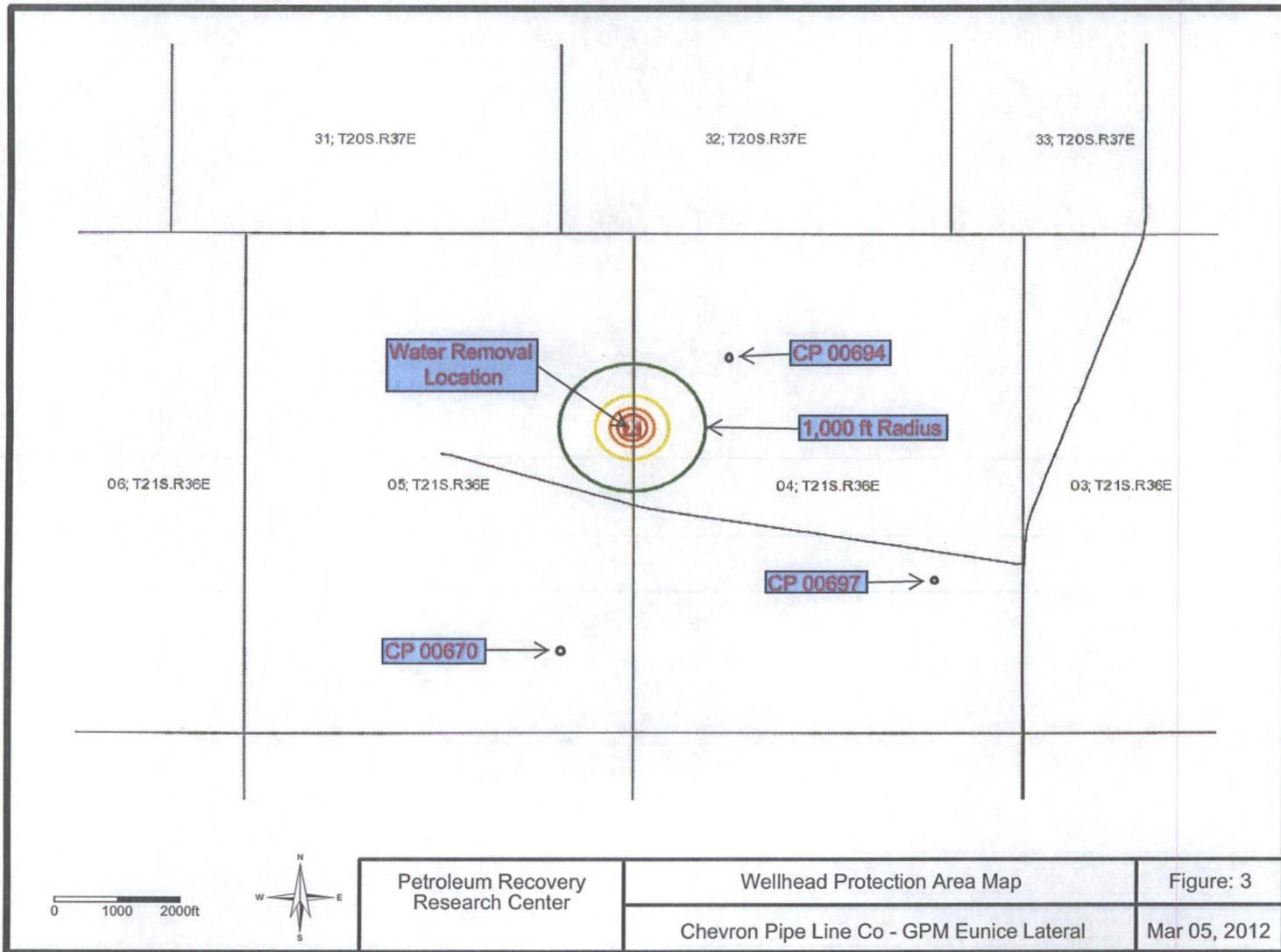
Petroleum Recovery  
Research Center

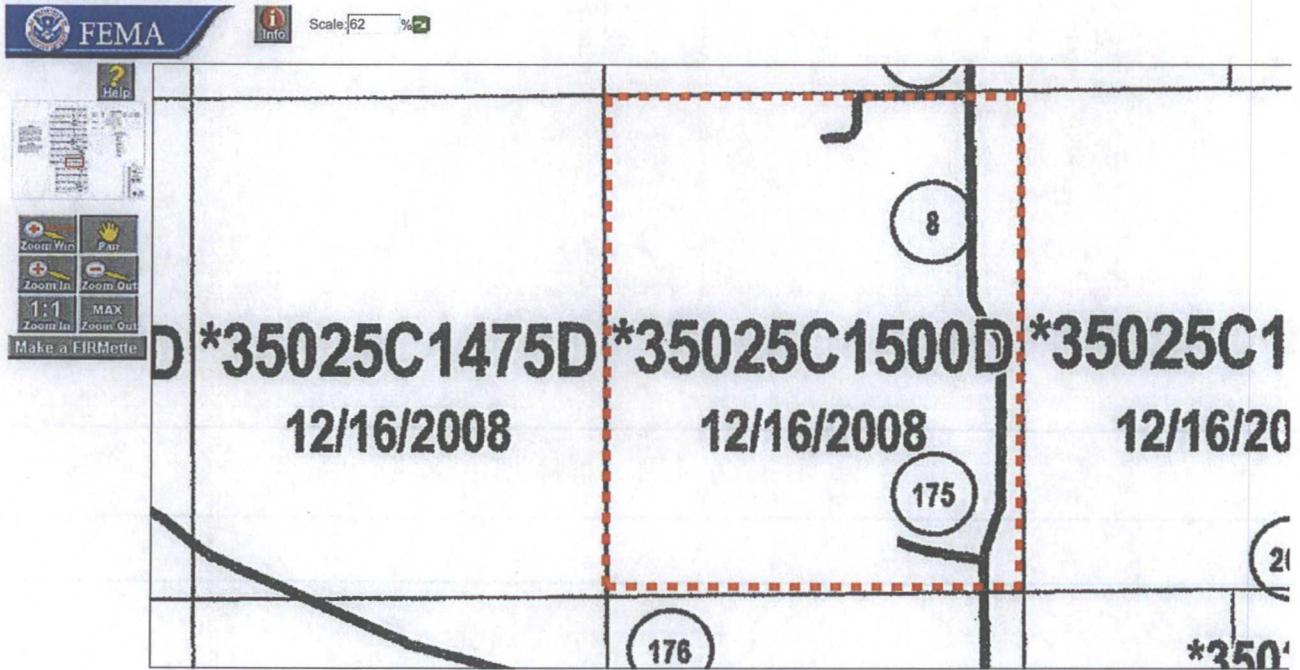
Surface Water Map

Figure: 2

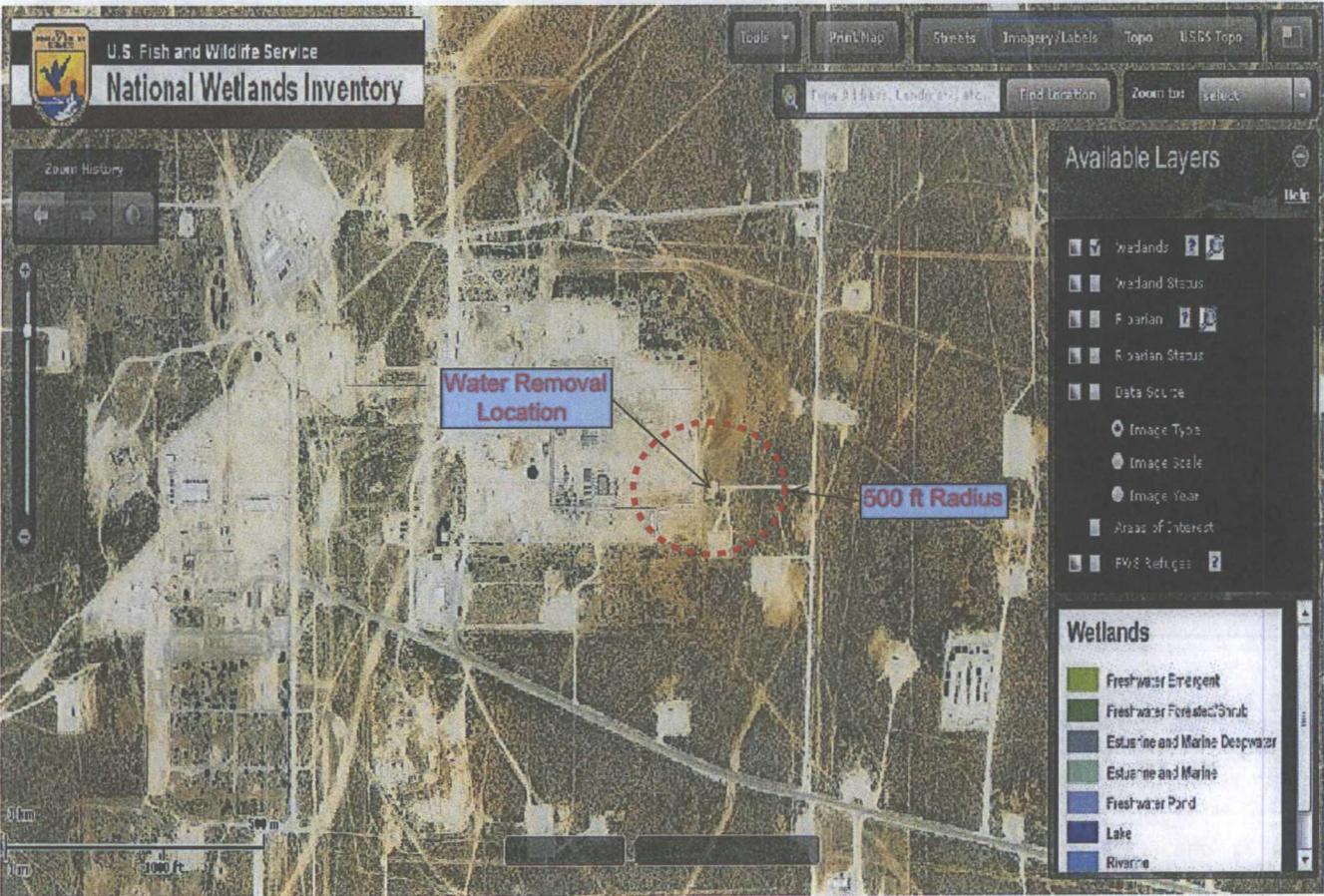
Chevron Pipe Line Co - GPM Eunice Lateral

Feb 29, 2012





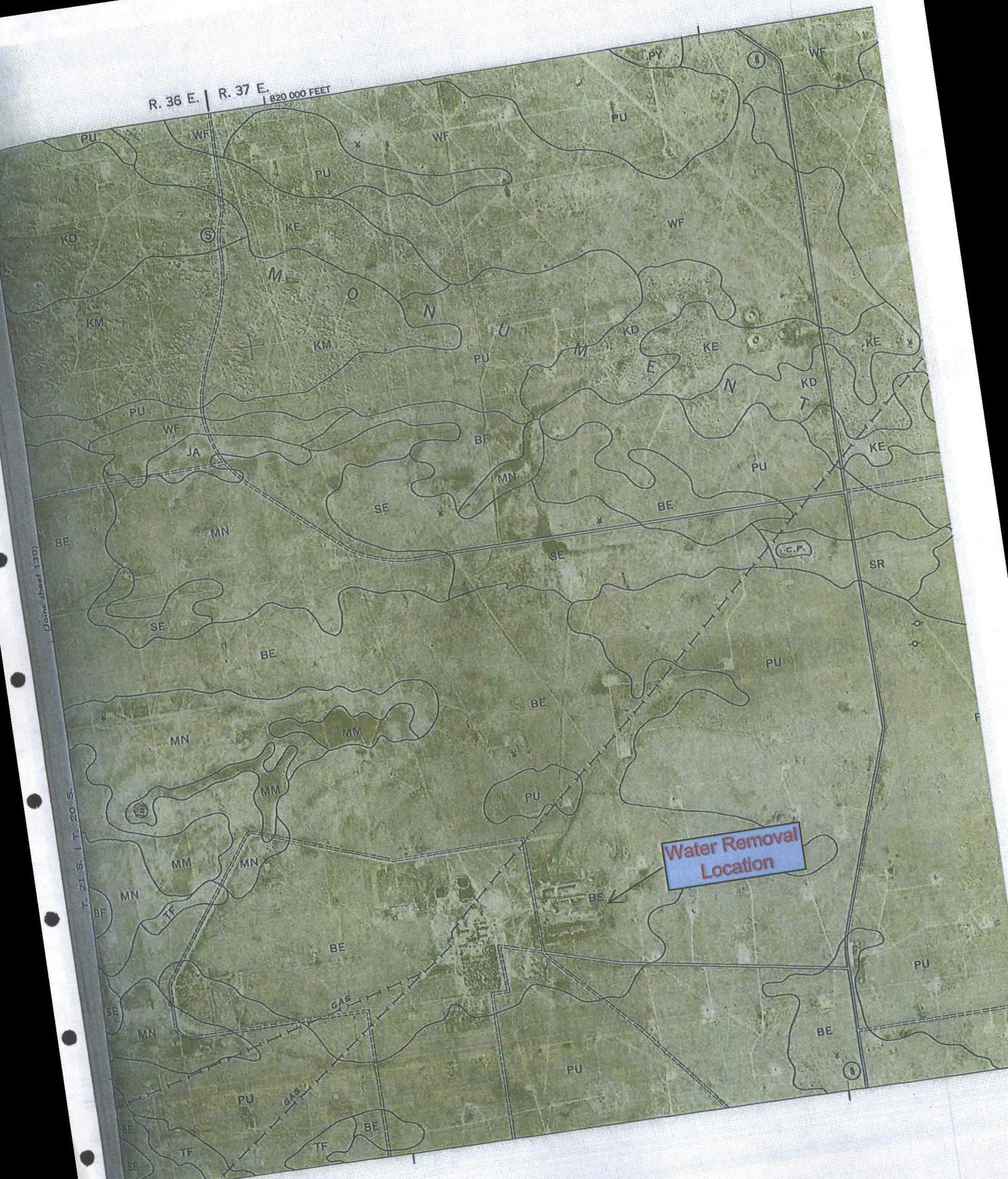
**Figure 4**  
**FEMA Floodplain Map**



**Figure 5**  
**National Wetlands Inventory Map**

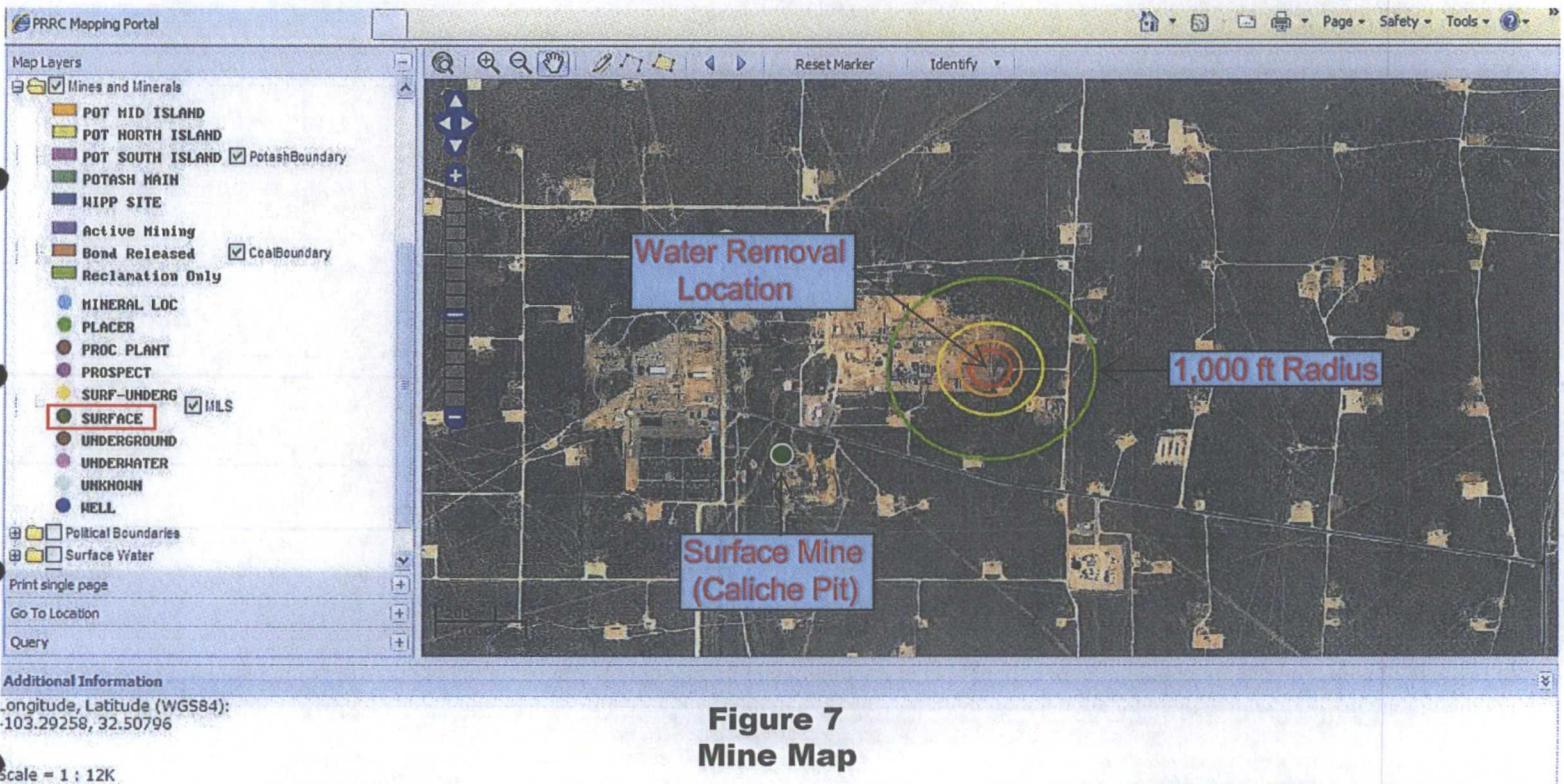
<http://107.20.228.18/Wetlands/WetlandsMapper.html>

3/5/2012

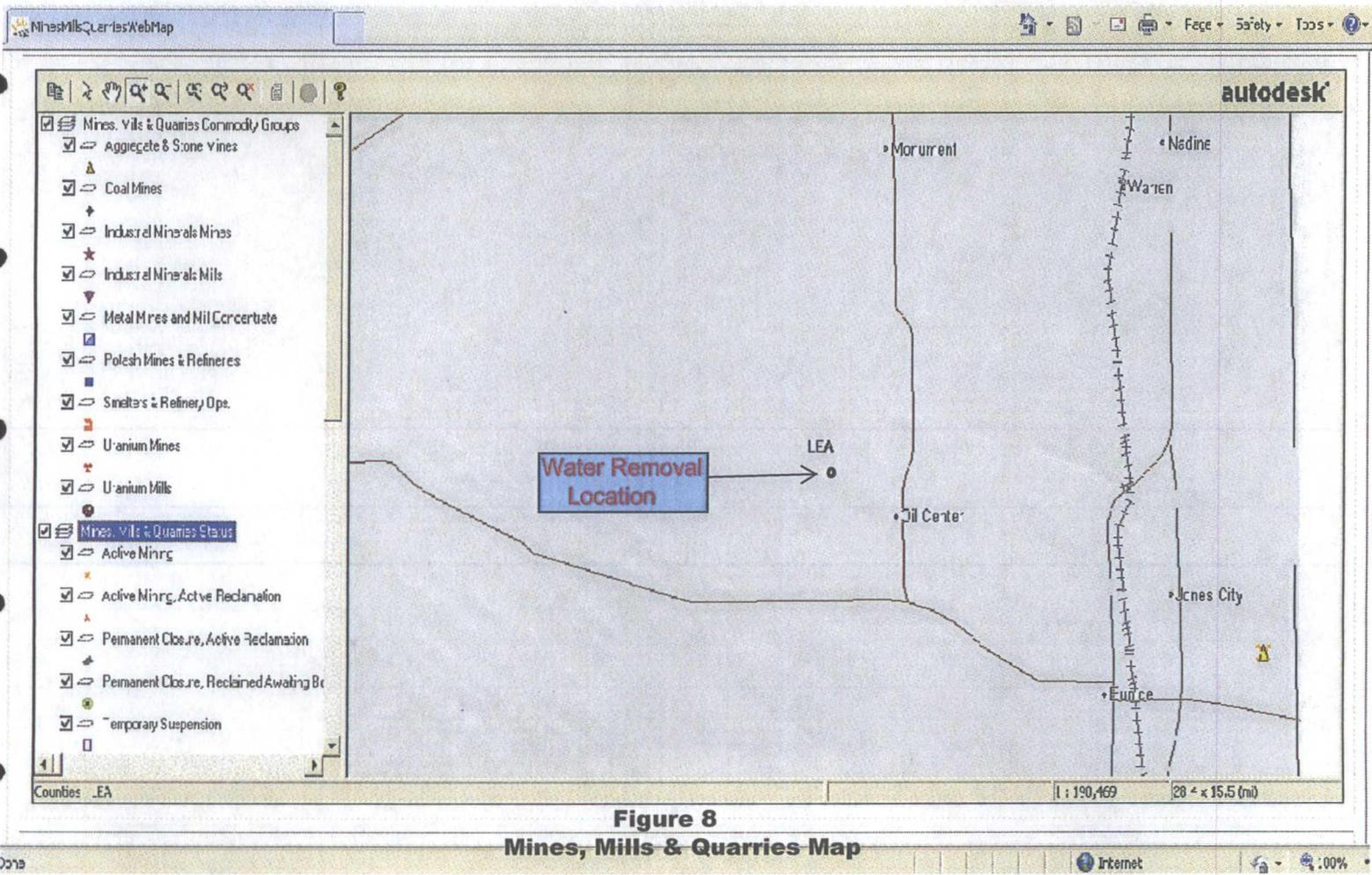


Water Removal Location

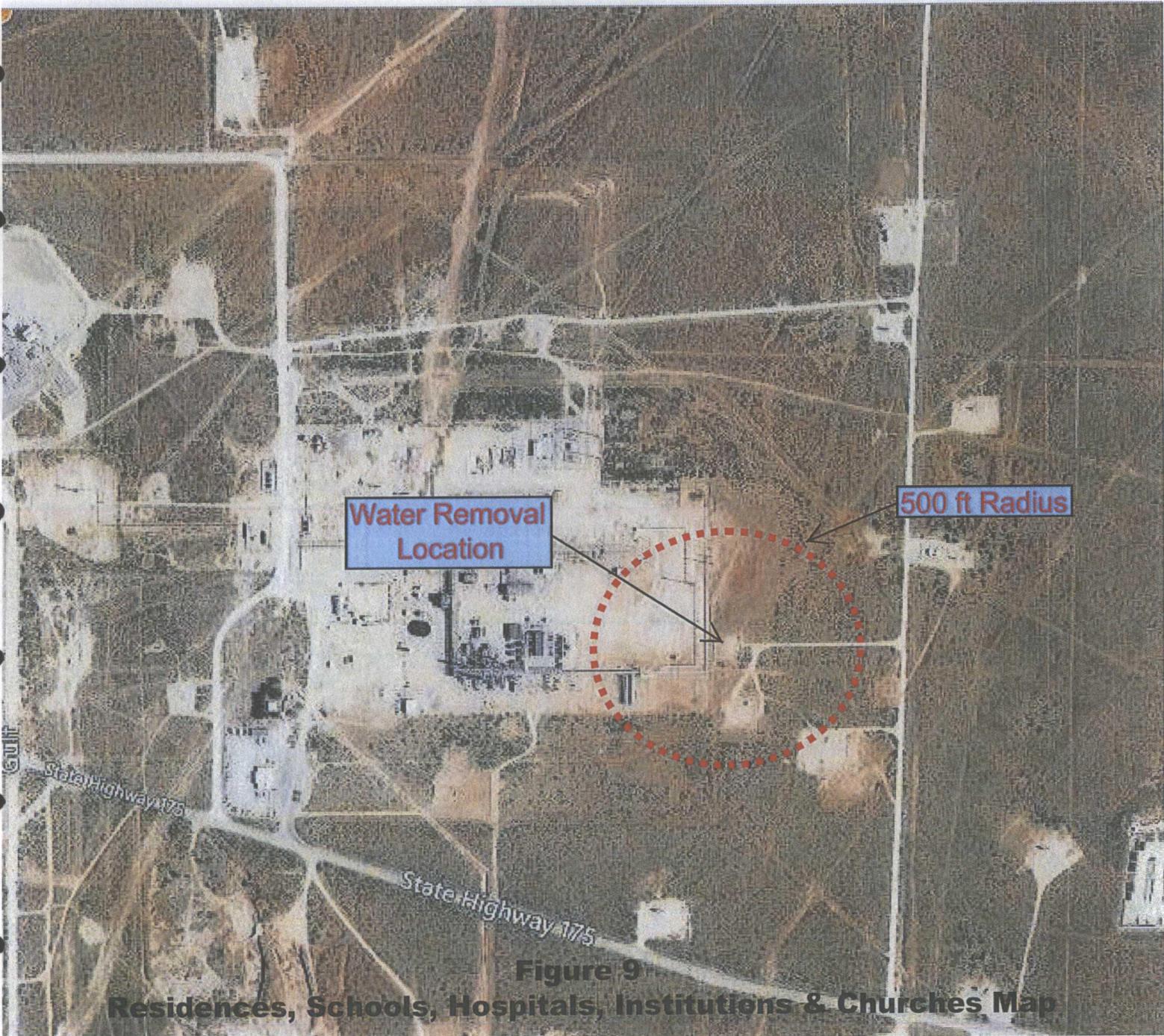
Figure 6  
Soil Survey Map



**Figure 7  
Mine Map**



**Figure 8**  
**Mines, Mills & Quarries Map**



Water Removal Location

500 ft Radius

Gulf

State Highway 175

State Highway 175

Figure 9

Residences, Schools, Hospitals, Institutions & Churches Map



**Additional Information**  
Longitude, Latitude (WGS84):  
-103.30525, 32.51352

**Figure 10**  
**Water Wells Map**

Scale = 1 : 24K



*New Mexico Office of the State Engineer*  
**Currently Active Points of Diversion**  
 (with Ownership Information)

WR File Nbr	Sub	Basin	Use	Diversion	Owner	County	POD Number	Grant	Source	g g g		X	Y
										Sec	Tws		
CP 00670	SRO	0			GULF OIL CORPORATION	ED	CP 00670		Mixed	1 4 4	05	21S 36E	661383 3597536*
CP 00694	SRO	0			CHEVRON U.S.A. INC.	LE	CP 00694		Mixed	1 04		21S 36E	662073 3598446*
CP 00697	SRO	0			CHEVRON U.S.A. INC.	LE	CP 00697		Shallow	3 2 4	04	21S 36E	662988 3597760*

Record Count: 3

**PLSS Search:**

Section(s): 4-5      Township: 21S      Range: 36E

Sorted by: File Number

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



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*New Mexico Office of the State Engineer*  
**Currently Active Points of Diversion**  
(with Ownership Information)

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No PODs found.

POD Search:

POD Number: L 00670

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CURRENTLY ACTIVE POINTS OF DIVERSION



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*New Mexico Office of the State Engineer*  
**Currently Active Points of Diversion**  
(with Ownership Information)

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No PODs found.

POD Search:

POD Number: L 00694

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3/9/12 8:37 AM

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CURRENTLY ACTIVE POINTS OF DIVERSION



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*New Mexico Office of the State Engineer*  
**Currently Active Points of Diversion**  
(with Ownership Information)

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No PODs found.

POD Search:

POD Number: L 00697

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The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

3/9/12 8:32 AM

Page 1 of 1

CURRENTLY ACTIVE POINTS OF DIVERSION