

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised October 10, 2003

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

IRP-2229

**OPERATOR**

Initial Report  Final Report

Name of Company	Plains Pipeline, LP	Contact	Jason Henry
Address	2530 Hwy 214 - Denver City, Tx 79323	Telephone No.	(575) 441-1099
Facility Name	Lea to New McKee 8-inch	Facility Type	Pipeline

Surface Owner	Deck Estate	Mineral Owner		Lease No.	
---------------	-------------	---------------	--	-----------	--

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	28	20S	37E					Lea

Latitude N 32.5485° Longitude W 103.24936°

**NATURE OF RELEASE**

Type of Release	Crude Oil	Volume of Release	25 bbls	Volume Recovered	0 bbls
Source of Release	8" Steel Pipeline	Date and Hour of Occurrence	06/27/2009	Date and Hour of Discovery	06/27/2009 @ 11:00
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	Larry Johnson (leak was originally estimated to be 2 bbls, revised to 25 bbls on 07/15/2009)		
By Whom?	Jason Henry	Date and Hour	07/15/2009 @ 13:00		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	HOBS OCD		

If a Watercourse was Impacted, Describe Fully.\*  
  
JUN 21 2012

Describe Cause of Problem and Remedial Action Taken.\*  
**RECEIVED**  
Internal corrosion of Lea to New McKee 8" pipeline caused a release of crude oil. Throughput for the subject line is 12,000 bbls/day and the operating pressure of the pipeline is 80 psi. The depth of the pipeline at the release point is approximately 1' bgs. The H2S concentration in the crude is less than 10 ppm and the gravity of the crude is 42.

Describe Area Affected and Cleanup Action Taken.\*  
Please see the attached Nova Safety and Environmental Site Closure Request for details regarding the remedial activities conducted at the site.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	<i>Jason Henry</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name:	Jason Henry	Approved by	ENV SPECIALIST: <i>Staff</i>
Title:	Remediation Coordinator	Approval Date:	6/21/12
E-mail Address:	jhenry@paalp.com	Expiration Date:	-
Date:	06/21/2012	Conditions of Approval:	Attached <input type="checkbox"/> IRP-9-7-2229
Phone:	(575) 441-1099		

\* Attach Additional Sheets If Necessary.

# SITE CLOSURE REQUEST

**LEA TO NEW MCKEE 8-INCH**  
NE ¼, NE ¼, SECTION 28, TOWNSHIP 20 SOUTH, RANGE 37 EAST  
MONUMENT, NEW MEXICO  
PLAINS SRS NUMBER: 2009-149  
NMOCD Reference Number: 1RP-2229

Prepared for:

**PLAINS PIPELINE, L.P.**  
333 Clay Street, Suite 1600  
Houston, Texas 77002



**HOBBS OCD**

**JUN 21 2012**

**RECEIVED**

Prepared by:

**NOVA Safety and Environmental**  
2057 Commerce  
Midland, Texas 79703

**May 2012**

A handwritten signature in black ink, appearing to read "Ronald K. Rounsaville".

Ronald K. Rounsaville  
Senior Project Manager

A handwritten signature in black ink, appearing to read "Brittan K. Byerly".  
Brittan K. Byerly, P.G.  
President

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FIGURE 1: Site Location Map

FIGURE 2: Site Map with Soil Sample Locations

### TABLES

TABLE 1: Concentrations of BTEX and TPH in Soil

### APPENDICES

APPENDIX A: Laboratory Reports

APPENDIX B: Notification of Release and Corrective Action (Form C-141)

## **1.0 INTRODUCTION**

On behalf of Plains Pipeline, L.P. (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Site Closure Request to the New Mexico Oil Conservation Division (NMOCD). The Lea to New McKee 8-Inch Release Site is located approximately five miles south of Monument in Lea County, New Mexico. The site is located in the NE ¼ NE ¼, Section 28, Township 20 South, Range 37 East. A Site Location Map is presented as Figure 1. Plains reported the crude oil release occurred on June 27, 2009 and was estimated at 25 barrels, with none recovered. The release resulted in a surface stained area measuring approximately 15 feet in length by 10 feet wide. The release impacted approximately 1,100 square feet of the pipeline right-of-way and land owned by the Deck Estate. Emergency response activities consisted of immediately excavating around the pipeline in the release area, locating the leak point and replacing the compromised segment of the line. On June 30, 2009, initial site activities consisted of excavating the contaminated soil to a depth of approximately five feet below ground surface (bgs). The pipeline was exposed and hydrocarbon impacted soil excavated during the emergency response activities were stockpiled on plastic sheeting for further remediation. The excavation surrounding the pipeline was expanded to a maximum depth of approximately twenty-eight (28) below ground surface (bgs). The dimensions of the final excavation area measured approximately 40 feet in length (north to south) by 60 feet in width (east to west). A Site Details and Soil Sample Locations Map depicting site features is presented as Figure 2.

## **2.0 NMOCD SITE CLASSIFICATION**

The depth to groundwater at the site is less than 50 feet bgs. Based on the NMOCD soil classification system, 20 points would be assigned to the site as a result of this criterion.

The distance to the nearest water source exceeds 1,000 feet, resulting in zero points being assigned to the site on this ranking criterion. There is no surface water body located within 1,000 feet of the site, resulting in zero points being assigned on this ranking criterion. The NMOCD guidelines indicate that the site would have a Ranking Score of >19. The soil action levels for a site with a Ranking Score of >19 points are as follows:

- Benzene - 10 ppm
- BTEX - 50 ppm
- TPH - 100 ppm

## **3.0 SUMMARY OF RECENT FIELD ACTIVITIES**

### **3.1 Impacted Soil Removal**

Excavation of the impacted soils in the area of the release point began on July 6, 2009. An excavator was utilized to remove impacted soil from the floor and sidewalls of the excavation area. The excavated soil was stockpiled on-site and blended with non-impacted soil from the surrounding area. On July 9, July 13 and August 3, 2009, NOVA personnel collected soil samples from the north, south, east and west walls and floor of the excavation area. Based on

visual and olfactory observations and laboratory analytical results, the final dimensions of the excavation area were approximately 40 feet in length (north to south) by 55 feet in width (east to west) and averaged approximately 22 feet below ground surface (bgs). An estimated 1,250 cubic yards of soil was brought to surface for onsite remediation by mixing, blending and aeration methods. Excavation and backfilling activities were completed on April 5, 2012. Figure 2 is a Site Details and Soil Sample Locations Map displaying the pipeline, leak source, excavation area, confirmation soil sample locations and other site details.

### **3.2 Excavated Soil Remediation**

Excavated soil was staged in a cleared area located north of the excavation. Non-impacted near-surface soil collected from within the cleared area was pushed up and used to blend with the impacted soil.

### **3.3 Confirmation Soil Sampling – Excavation Areas**

Confirmation soil samples collected from the excavation were submitted for laboratory analysis for TPH by Method 8015M and BTEX by Method 8021B. Laboratory submitted samples were placed in a new sterile glass container, equipped with a Teflon-lined lid furnished by the laboratory. Samples were labeled, placed on ice, and chilled to a temperature of approximately 4° C. Appropriate chain-of-custody documentation and shipping protocols were followed. The laboratory analytical reports are provided in Appendix C. Table 1 displays the analytical results of confirmation soil samples.

On July 9, 2009, confirmation soil samples were collected from the floor and east wall of the excavation area. The analytical results of these soil samples indicated TPH and BTEX concentrations were below the NMOCD regulatory standards of 100 mg/Kg and 50 mg/Kg, respectively, with the exception of two soil samples identified as LP BH-1, 23 ft. and LP E. Wall, 19 ft. The analytical results for soil sample LP BH-1, 23 ft. indicated the total petroleum hydrocarbon (TPH) concentration was 4,910 mg/Kg. The analytical results for soil sample LP E. Wall, 19 ft. indicated the TPH concentration was 39,100 mg/Kg.

On July 13 and August 3, 2009, upon receipt of the initial analytical results, the areas represented by soil samples LP BH-1, 23 ft. and LP E. Wall, 19 ft. were over excavated to a depth of approximately 28 feet bgs. Additional confirmation soil samples were collected from the floor and four sidewalls of the over-excavated area. The analytical results on the soil samples identified as N. Wall, 16 ft., S. Wall, 16 ft., E. Wall, 16 ft., E. Floor, 23 ft., Mid. Floor, 28 ft., W. Wall, 16 ft. and NE Floor, 23 ft. indicated TPH and BTEX concentrations were below the NMOCD regulatory standards.

### **3.4 Confirmation Soil Sampling – Blended Soil Piles**

On August 7, 2009, three composite soil samples (SS-A (West), SS-B (Mid) and SS-C (East)) were collected from the blended soil stockpiles and submitted to the laboratory for analysis. The analytical results indicated the TPH concentration of the stockpile soils ranged from 881 mg/Kg

to 2,780 mg/Kg. Benzene concentrations were less than 0.010 mg/Kg and total BTEX concentrations were below 50 mg/Kg in all stockpile samples.

During the period from September 2009 through October 2011, the soil stockpile was re-blended, mixed with a fertilizer solution and re-sampled during six additional sampling events. Review of laboratory analytical results during this period indicated TPH concentrations exhibited a declining trend. Following the February 2, 2012 sampling event, analytical results on soil stockpile samples SS-A8, SS-B8 and SS-C8 indicated TPH concentrations ranging from 113 mg/Kg to 295 mg/Kg. On March 22, 2012, Plains met with the NMOCD Hobbs District office to discuss the remediation of the site and the most recent soil sample results.

### **3.5 Backfilling and Surface Restoration**

Based on analytical results of laboratory analyzed confirmation soil samples obtained from the excavation area and bio-remediated soil piles, on March 22, 2012, the NMOCD approved the backfilling of the excavation with remediated soil. On April 5, 2012, backfilling activities were completed and the disturbed area was contoured to reflect the surrounding topography. Pursuant to Plains agreement with the Deck Estate, the upper-most three feet of the excavation was backfilled with non-impacted soil.

### **4.0 SOIL CLOSURE REQUEST**

Plains has completed activities and based upon laboratory analytical results, requests NMOCD approval for soil closure.

### **5.0 LIMITATIONS**

NOVA has prepared this Soil Closure Request to the best of its ability. No other warranty, expressed or implied, is made or intended. NOVA has examined and relied upon documents referenced in the report and has relied on oral statements made by certain individuals. NOVA has not conducted an independent examination of the facts contained in referenced materials and statements. We have presumed the genuineness of the documents and that the information provided in documents or statements is true and accurate. NOVA has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. NOVA also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report.

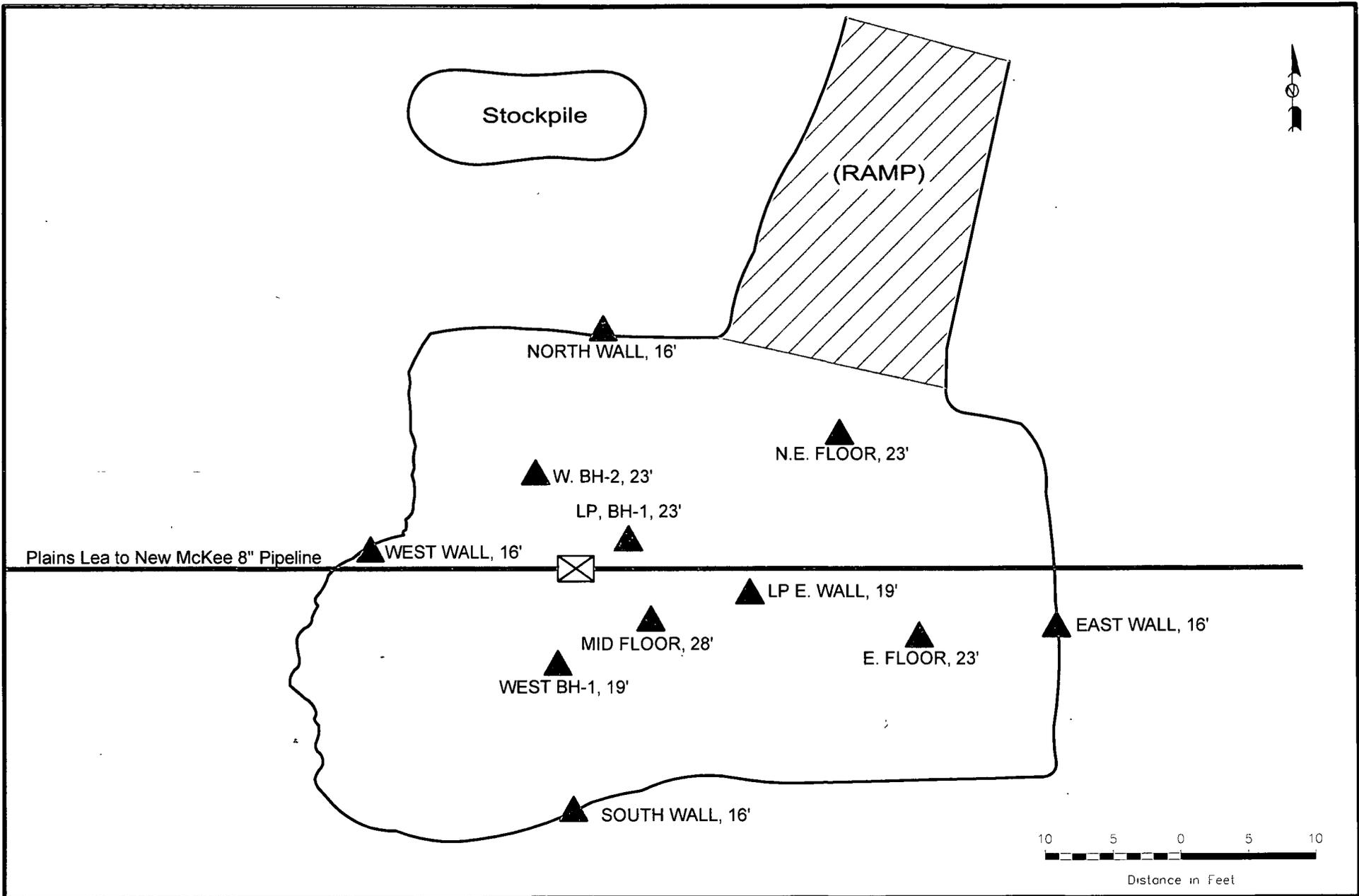
This report has been prepared for the benefit of Plains. The information contained in this report including all exhibits and attachments may not be used by any other party without the express written consent of NOVA and/or Plains.

## 6.0 DISTRIBUTION

- Copy 1: Geoffrey R. Leking  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division District 1  
1625 French Drive  
Hobbs, NM 88240
- Copy 2: Jason Henry  
Plains Marketing, L.P.  
2530 State Highway 214  
Denver City, TX 79323  
jhenry@paalp.com
- Copy 3: Jeff Dann (Electronic Copy)  
Plains Marketing, L.P.  
333 Clay Street, Suite 1600  
Houston, Texas 77002  
jpdann@paalp.com
- Copy 4: NOVA Safety and Environmental.  
2057 Commerce Drive  
Midland, Texas 79703  
rrounsaville@novatraining.cc

# FIGURES





LEGEND:

-  Confirmation Soil Sample Locations
-  Leak Source

Figure 2  
 Site Details & Soil  
 Sample Locations Map  
 Lea Station to New McKee 8"  
 Plains Pipeline  
 Lea County, New Mexico



2057 Commerce Drive  
 Midland, Texas 79703  
 432 520 7720

www.novasafetyandenvironmental.com

April 26, 2012	Scale: 1" = 10'	CAD By: TA	Checked By: RKR
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## **TABLES**

**TABLE I**  
**BTEX AND TPH CONCENTRATIONS IN SOIL**  
**PLAINS PIPELINE, L.P.**  
**LEA STATION TO NEW MCKEE 8-INCH**  
**MONUMENT, NEW MEXICO**  
**SRS # 2009-149**

*All Concentrations are reported in mg/Kg*

SAMPLE DATE	SAMPLE LOCATION	SAMPLE DEPTH	SOIL STATUS	EPA SW 846-8015M			EPA SW 846-8021B, 5030				
				GRO C6-C12 mg/Kg	DRO C12-C35 mg/Kg	Total TPH C6-C35	BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENES
<b>NMOC REGULATORY STANDARD</b>				-	-	100	10	-	-	-	-
<b>MAIN EXCAVATION AREA</b>											
07/09/09	LP BH-1 23'	23'	Excavated	3,010	1,900	4,910	12.4	86	57.5	96.4	
07/09/09	LP E. Wall 19'	19'	Excavated	13,700	25,400	39,100	89.5	382	202	349	
07/09/09	W. BH-1 19'	19'	In-Situ	17.50	<50.0	17.50	<0.0100	<0.0100	<0.0100	<0.0100	
07/09/09	W. BH-2 23'	23'	In-Situ	2.93	<50.0	2.93	<0.0100	<0.0100	<0.0100	<0.0100	
07/13/09	N. Wall, 16'	16'	In-Situ	<1.00	<50.0	<50.0	<0.01	<0.01	<0.01	<0.01	
07/13/09	S. Wall, 16'	16'	In-Situ	<1.00	<50.0	<50.0	<0.01	<0.01	<0.01	0.323	
07/13/09	E. Wall, 16'	16'	In-Situ	<1.00	<50.0	<50.0	<0.01	<0.01	<0.01	<0.01	
07/13/09	E. Floor, 23'	23'	In-Situ	<1.00	<50.0	<50.0	<0.01	<0.01	<0.01	<0.01	
07/13/09	Mid. Floor, 28'	28'	In-Situ	<1.00	<50.0	<50.0	<0.01	<0.01	<0.01	<0.01	
08/03/09	W. Wall, 16'	16'	In-Situ	4.40	<50.0	4.40	<0.01	0.179	0.115	0.509	
08/03/09	NE Floor 23'	23'	In-Situ	3.50	<50.0	3.50	<0.01	<0.01	<0.01	<0.01	
<b>BLENDED SOIL STOCKPILE</b>											
08/07/09	SS-A (West)	--	Blended	159	1,150	1,309	<0.01	0.766	1.02	4.4	
08/07/09	SS-B (Mid)	--	Blended	1,180	1,600	2,780	<0.01	2.7	4.31	13.9	
08/07/09	SS-C (East)	--	Blended	137	744	881	<0.01	0.303	4.84	2.27	
09/24/09	SS-A 2 (West)	--	Blended	21.5	1200	1,221.5	<0.01	<0.01	<0.01	0.117	
09/24/09	SS-B 2 (Mid)	--	Blended	30.7	1040	1,070.7	<0.01	<0.01	<0.01	0.289	
09/24/09	SS-C 2 (East)	--	Blended	50.3	1670	1,720.0	<0.01	<0.01	0.0394	0.86	
11/06/09	SS-A 3 (West)	--	Blended	15.4	594	609.0	<0.01	<0.01	<0.01	<0.01	
11/06/09	SS-B 3 (Mid)	--	Blended	21.6	295	273.4	<0.01	<0.01	<0.01	<0.01	
11/06/09	SS-C 3 (East)	--	Blended	37.6	1230	1,267.6	<0.01	<0.01	<0.01	0.107	
04/08/10	SS-A 4 (West)	--	Blended	18.2	740	758.2	<0.01	<0.01	<0.01	<0.01	
04/08/10	SS-B 4 (Mid)	--	Blended	13	667	680	<0.01	<0.01	<0.01	<0.01	
04/08/10	SS-C 4 (East)	--	Blended	8.7	494	502.7	<0.01	<0.01	<0.01	<0.01	
11/30/10	SS-A 5 (West)	--	Blended	<2.00	342	342	<0.0200	<0.0200	<0.0200	<0.0200	
11/30/10	SS-B 5 (Mid)	--	Blended	<2.00	441	441	<0.0200	<0.0200	<0.0200	<0.0200	
11/30/10	SS-C 5 (East)	--	Blended	<2.00	434	434	<0.0200	<0.0200	<0.0200	<0.0200	

TABLE 1

## BTEX AND TPH CONCENTRATIONS IN SOIL

PLAINS PIPELINE, L.P.  
LEA STATION TO NEW MCKEE 8-INCH  
MONUMENT, NEW MEXICO  
SRS # 2009-149

All Concentrations are reported in mg/Kg

SAMPLE DATE	SAMPLE LOCATION	SAMPLE DEPTH	SOIL STATUS	EPA SW 846-8015M			EPA SW 846-8021B, 5030				
				GRO C6-C12 mg/Kg	DRO C12-C35 mg/Kg	Total TPH C <sub>6</sub> -C <sub>35</sub>	BENZENE	TOLUENE	ETHYL-BENZENE	m, p - XYLENES	o - XYLENES
NMOCD REGULATORY STANDARD				-	-	100	10	-	-	-	-
06/28/11	SS-A 6 (West)	--	Blended	<2.00	230	230	<0.0200	0.0375	<0.0200	<0.0200	
06/28/11	SS-B 6 (Mid)	--	Blended	2.89	221	223.89	<0.0200	0.113	0.0292	0.0607	
06/28/11	SS-C 6 (East)	--	Blended	2.12	242	244.12	<0.0200	0.0947	0.0223	0.0459	
10/05/11	SS-A 7 (West)	--	Blended	5.91	362	367.91	<0.0200	<0.0200	<0.0200	<0.0200	
10/05/11	SS-B 7 (Mid)	--	Blended	3.44	421	424.44	<0.0200	<0.0200	<0.0200	<0.0200	
10/05/11	SS-C 7 (East)	--	Blended	3.37	298	301.37	<0.0200	<0.0200	<0.0200	<0.0200	
02/02/12	SS-A 8 (West)	--	Blended	<2.00	202	202	<0.0200	<0.0200	<0.0200	<0.0200	
02/02/12	SS-B 8 (Mid)	--	Blended	<2.00	113	131	<0.0200	<0.0200	<0.0200	<0.0200	
02/02/12	SS-C 8 (East)	--	Blended	<2.00	295	295	<0.0200	<0.0200	<0.0200	<0.0200	

## **APPENDICES**

**APPENDIX A**  
**Laboratory Analytical Reports**

**APPENDIX B**  
**Release Notification and Corrective Action**  
**(Form C-141)**

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, Artesia, NM 88210  
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1220 S. St. Francis Dr., Santa Fe, NM 87505

**RECEIVED**  
JUL 15 2009  
**HOBBSOCD**

State of New Mexico  
Energy Minerals and Natural Resources  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised October 10, 2003  
Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

**OPERATOR**

Initial Report  Final Report

Name of Company	Plains Pipeline, LP	Contact	Jason Henry
Address	2530 Hwy 214 - Denver City, Tx 79323	Telephone No.	(575) 441-1099
Facility Name	Lea to New McKee 8-inch	Facility Type	Pipeline
Surface Owner	Deck Estate	Mineral Owner	
		Lease No.	

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
A	28	20S	37E					Lea

Latitude N 32.5485° Longitude W 103.24936°

*WTR 30' 40'*

**NATURE OF RELEASE**

Type of Release	Crude Oil	Volume of Release	25 bbls	Volume Recovered	0 bbls
Source of Release	8" Steel Pipeline	Date and Hour of Occurrence	06/27/2009	Date and Hour of Discovery	06/27/2009 @ 11:00
Was Immediate Notice Given?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom?	Larry Johnson (leak was originally estimated to be 2 bbls, revised to 25 bbls on 07/15/2009)		
By Whom?	Jason Henry	Date and Hour	07/15/2009 @ 13:00		
Was a Watercourse Reached?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.			

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*  
Internal corrosion of Lea to New McKee 8" pipeline caused a release of crude oil. Throughput for the subject line is 12,000 bbls/day and the operating pressure of the pipeline is 80 psi. The depth of the pipeline at the release point is approximately 1' bgs. The H2S concentration in the crude is less than 10 ppm and the gravity of the crude is 42.

Describe Area Affected and Cleanup Action Taken.\*  
The released crude resulted in a surface stain that measured approximately 6' x 4'. The impacted area will be remediated per applicable guidelines.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	<i>Jason Henry</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name:	Jason Henry	<i>J. Johnson</i> Approved by District Supervisor <b>ENVIRONMENTAL ENGINEER</b>	
Title:	Remediation Coordinator	Approval Date:	7.15.09
E-mail Address:	jhenry@paalp.com	Expiration Date:	9.15.09
Date:	07/15/2009	Conditions of Approval:	1 IEP# Attached <input type="checkbox"/> 09.9.2229
Phone:	(575) 441-1099		

\* Attach Additional Sheets If Necessary