GW - 028

C-141s
(6)

From:	Chavez, Carl J, EMNRD
To:	Combs, Robert
Cc:	Leik, Jason; Denton, Scott; Dade, Randy
Subject:	RE: GW-028 HollyFrontier Navajo Refining LLC – Artesia Refinery July 2020 Release Characterization Notification
Date:	Tuesday, December 8, 2020 1:50:00 PM

Robert, et al.,

The New Mexico Oil Conservation Division (OCD) has completed review of the above subject notification.

OCD concurs with the remedial investigation plans and reporting proposed by HollyFrontier Navajo Refining LLC.

Thank you.

Carl J. Chavez ● Environmental Engineer
Environmental Bureau
EMNRD - Oil Conservation Division
5200 Oakland Avenue, N.E. Suite 100 | Albuquerque, NM 87113
505.660.7923 | CarlJ.Chavez@state.nm.us
http://www.emnrd.state.nm.us/OCD/

From: Combs, Robert <Robert.Combs@HollyFrontier.com>
Sent: Friday, November 13, 2020 7:50 AM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Cc: Leik, Jason <Jason.Leik@HollyFrontier.com>; Denton, Scott <Scott.Denton@HollyFrontier.com>; Dade, Randy <Lewis.Dade@HollyFrontier.com>
Subject: [EXT] GW-028 HollyFrontier Navajo Refining LLC – Artesia Refinery July 2020 Release Characterization Notification

Carl,

On Thursday, November 19, 2020, HollyFrontier Navajo Refining LLC (HFNR) is tentatively scheduled to conduct release characterization/assessment activities for the secondary reverse osmosis (SRO) feedwater release that occurred at the Artesia Refinery on July 5, 2020. Please see below for HFNR's characterization/assessment plan for this release, which was developed in general accordance with the *Draft Reportable Releases Response and Characterization Plan* that HFNR submitted to the OCD on June 1, 2020.

Release Background and Response Actions Completed
The release occurred while the SRO unit was shut down and the SRO feedwater (primary reverse osmosis [RO] reject) was being diverted to the refinery process sewer. The diversion caused the

sewer to back up and overflow at the location shown on the attached figures (Figure 1 and 2). Approximately 98 barrels of SRO feedwater and 2 barrels of oily residues were released to the ground surface and contained within a depression under an existing pipe rack to the north of the release location. As shown on the attached Figure 1, the release occurred entirely within a proposed RCRA permitted Solid Waste Management Unit (expanded SWMU 25, North Plant Process Area)[1]. The approximate extent of the release area is shown on the attached figures. The initial C-141 Form for this release was submitted to the New Mexico Oil Conservation Division (OCD) on August 5, 2020.

Upon discovery of the release, HFNR completed the following release response actions:

- Immediately ceased diversion of the SRO feedwater to the sewer.
- Recovered free liquids with a vacuum truck and placed in the refinery process sewer. Approximately 98 barrels of SRO feedwater were recovered.
- Removed soil based on visual and olfactory indications of impacts (i.e., staining, odor, and moisture content) and placed in covered roll-off boxes.

Proposed Characterization/Assessment Activities

Surface soil samples will be collected from the release area to evaluate whether additional remediation actions are necessary, as follows:

- Grab surface soil samples will be collected at an approximate frequency of one per 400 square feet (SF) across the approximate 2,000-SF release area (i.e., 5 discrete grab samples are expected to be collected). Surface soil samples will be collected from 0 to 0.5 feet below ground surface (bgs).
- Proposed surface soil sample locations are shown on the attached Figure 2, but the final locations will be determined in the field and biased to the strongest indications of hydrocarbon impacts (based on odor and PID readings).
- One field duplicate soil sample will be collected for data quality assurance/quality control (QA/QC) purposes.

Soil samples will be submitted for the following laboratory analysis:

- Volatile organic compounds (VOCs, listed in 20.6.2.3103 NMAC only) by Method 8260B
- Total petroleum hydrocarbons (TPH) diesel range organics (DRO), gasoline range organics (GRO), and oil range organics (OR0) by Method 8015
- Ethylene dibromide by Method 8011
- Semi-volatile organic compounds (SVOCs, listed in 20.6.2.3103 NMAC only) by Method 8270C
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Since the release occurred entirely within a RCRA permitted SWMU, soil analytical results will be compared to the lowest Industrial/Occupational Soil Screening Level (SSL) provided in Table A-1 of the New Mexico Environment Department (NMED) 2019 *Risk Assessment Guidance for Site Investigations and Remediation* (2019 Risk Guidance). If soil analytical results exceed NMED Industrial/Occupational SSLs, additional activity will be evaluated based on the final development of the area, i.e., completion of the RDU. The residual soil impacts will be managed under the RCRA corrective action program administered by the NMED.

Response actions and characterization/assessment results will be documented in a follow-up report to the C-141 Form and in the Annual Discharge Report submitted to OCD by June 15, 2021 in accordance with Section 2.E of Discharge Permit GW-028.

Closing

We intend to implement the characterization/assessment activities by November 19, 2020. Please reply to this email with any comments or give us a call to discuss.

Thanks,
Robert

[1]HFNR submitted a RCRA permit addendum to expand SWMU 25 to include the Selenium Reduction Technology Unit (SeRT) and the future Renewable Diesel Unit (RDU) process area.

Robert Combs
Environmental Specialist
HollyFrontier Navajo Refining LLC
Office: 575-746-5382
Cell: 575-308-2718
Email: Robert.Combs@HollyFrontier.com

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From:	Chavez, Carl J, EMNRD
To:	"Combs, Robert"
Cc:	Leik, Jason; Denton, Scott; Dade, Randy
Subject:	RE: GW-028 HollyFrontier Navajo Refining LLC – Artesia Refinery July 2020 Release Characterization Notification
Date:	Friday, November 13, 2020 9:00:00 AM

Robert, et al.,

Good morning!

Received. The New Mexico Oil Conservation Division (OCD) will respond soon.

All be safe!

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division (Albuquerque Office)
Energy Minerals and Natural Resources Department
5200 Oakland Avenue, NE
Albuquerque, New Mexico 87113
Ph. (505) 660-7923
E-mail: CarlJ.Chavez@state.nm.us
"Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?" (To see how, go to:
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Sent: Friday, November 13, 2020 7:50 AM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Cc: Leik, Jason <Jason.Leik@HollyFrontier.com>; Denton, Scott <Scott.Denton@HollyFrontier.com>; Dade, Randy <Lewis.Dade@HollyFrontier.com>
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Thanks,

Robert

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Robert Combs
Environmental Specialist
HollyFrontier Navajo Refining LLC
Office: 575-746-5382
Cell: 575-308-2718
Email: Robert.Combs@HollyFrontier.com

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From:	Combs, Robert
To:	Chavez, Carl J, EMNRD
Cc:	Leik, Jason; Denton, Scott; Dade, Randy
Subject:	[EXT] GW-028 HollyFrontier Navajo Refining LLC – Artesia Refinery July 2020 Release Characterization Notification
Date:	Friday, November 13, 2020 7:50:12 AM
Attachments:	Figure 1. Release Location Map.pdf Figure 2. Proposed Sample Location Map.pdf

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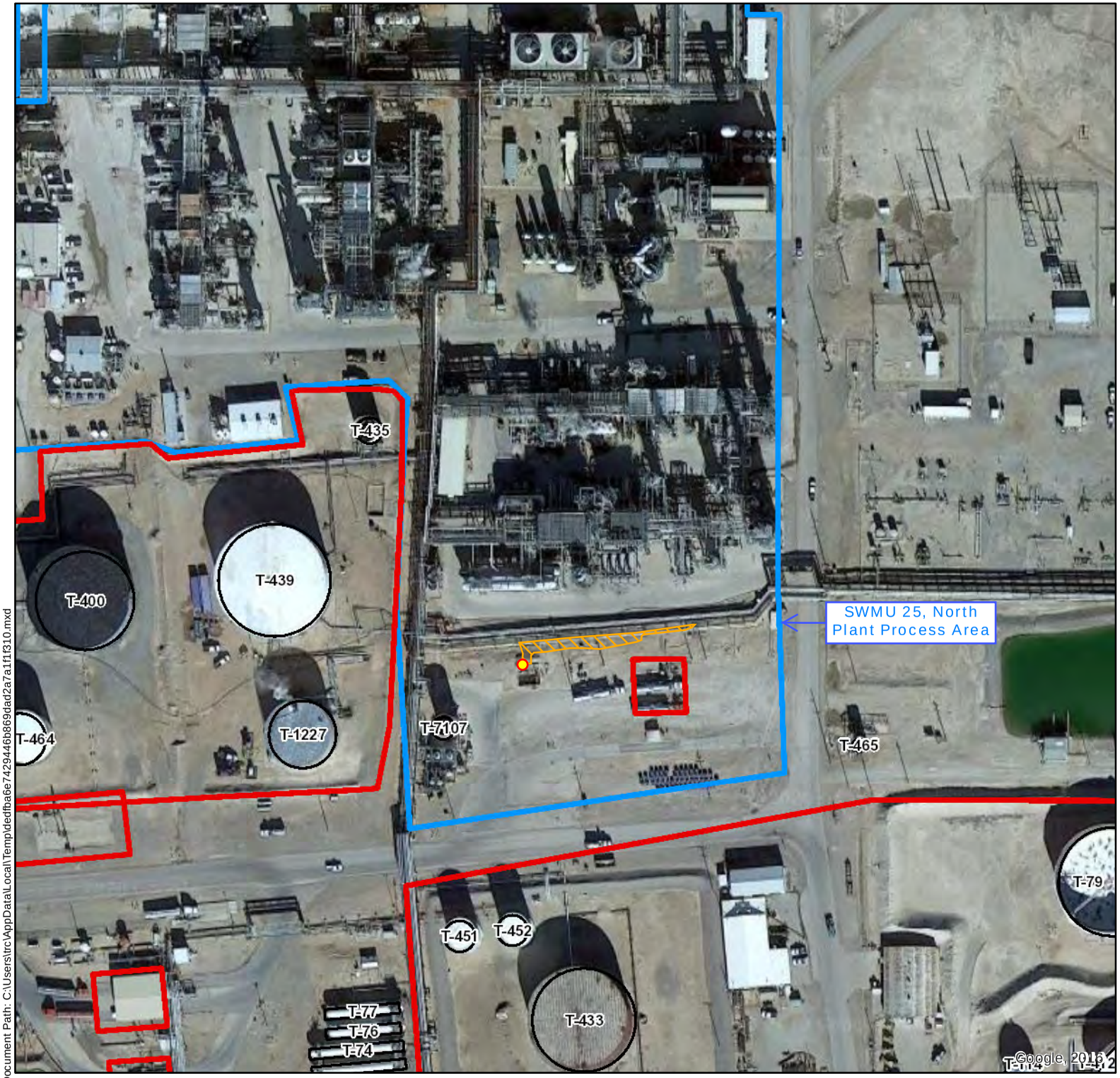
be construed as a digital or electronic signature or a commitment to a binding agreement.



LEGEND

- Approximate Release Extent
- Tanks
- Release Location
- AOC
- SWMU

Figure 1
Release Location Map

July 5, 2020 Secondary Reverse Osmosis (SRO) Feedwater Release

HollyFrontier Navajo Refining LLC
Artesia Refinery, GW-028

N

0 150 300
ft

TRC
505 E. HUNTLAND DR.
SUITE 250
AUSTIN, TX 78752
PH:512-329-6080

Document Path: C:\Users\trc\AppData\Local\Temp\dedfba6e7429446b8869dad2a7a11f1f310.mxd

LEGEND

- Approximate Release Extent
- Release Location
- Proposed Sample Location

Figure 2
Proposed Sample Location Map

July 5, 2020 Secondary Reverse Osmosis (SRO) Feedwater Release

HollyFrontier Navajo Refining LLC
Artesia Refinery, GW-028

N

0 37.5 75
ft

TRC
505 E. HUNTLAND DR.
SUITE 250
AUSTIN, TX 78752
PH:512-329-6080

Document Path: C:\Users\trc\AppData\Local\Temp\7445b68927b0476b86a877ffa50d107b0.mxd

C-141 Notification (8/17/2020 @ ~ 9 a.m.)
By Carl Chavez, EMNRD
FRO Unit Secondary RO Effluent Release (in area of new Renewable Diesel Unit)

- Carl on 8/14 was sent via meeting notice an agenda to discuss upcoming construction projects, status of recent submittals, recent releases and other items.
- Carl on 8/17 at ~ 9 a.m. received a call from Randy Dade to discuss a release of ~ 100 bbls of Secondary RO Reject Fluids release that occurred on 7/5/2020 that was rejected by the Online reporting system on 8/5 due to NAD83 coordinate error. Randy indicated had prepared the documentation for submittal on 7/5 but forgot to send in the release form. He did not send it to NMED because of the general chemistry nature of the release, i.e., high TDS, Cl, F, Fe, and SO4. Carl reminded Randy to send release reports directly to Carl because the facility is under a WQCC Permit. Randy indicated the release occurred within containment areas and within a construction area for the planned renewable diesel unit. Randy is awaiting a composite sample result from the construction area and will submit a map of the impacted and sampled area. Carl requested Randy to resend the C-141 with more info. in the proper areas of the forms with a map and indication analytical data is to be submitted upon receipt from the lab to indicate further remedial actions may be necessary based on the release. Carl sent Randy an e-mail requesting analytical from the Secondary RO Unit Effluent to check for characteristically hazardous characteristics of this fluid. Randy agreed to resend the C-141 Form with map before COB on 8/17.
- Carl on 8/17 will discuss during the refinery meeting at 1 p.m. and update Tiffany about the meeting.

From: Chavez, Carl J, EMNRD
To: "Dade, Randy"
Subject: RE: Release 07/05/2020; HollyFrontier Navajo Refining LLC
Date: Monday, August 17, 2020 4:15:00 PM

Randy, received.

I spoke with Robert Combs this afternoon. OCD is requesting analytical data from the RFO fluids as part of this release.

Thank you.

Mr. Carl J. Chavez, CHMM (#13099)
New Mexico Oil Conservation Division (Albuquerque Office)
Energy Minerals and Natural Resources Department
5200 Oakland Avenue, NE
Albuquerque, New Mexico 87113
Ph. (505) 660-7923
E-mail: CarlJ.Chavez@state.nm.us
"Why not prevent pollution, minimize waste to reduce operating costs, reuse or recycle, and move forward with the rest of the Nation?" (To see how, go to:
http://www.emnrd.state.nm.us/OCD **and see "Publications")**

From: Dade, Randy <Lewis.Dade@HollyFrontier.com>
Sent: Monday, August 17, 2020 3:57 PM
To: Chavez, Carl J, EMNRD <CarlJ.Chavez@state.nm.us>
Cc: Dade, Randy <Lewis.Dade@HollyFrontier.com>
Subject: [EXT] Release 07/05/2020; HollyFrontier Navajo Refining LLC

Carl,
Please find attached the C-141 for the release 07/05/2020 that we discussed 8/17/2020 in a phone call. Attached is a map of the release and pictures of the area of release. As stated, composite samples were collected and we are waiting for the results. I will follow up with you when I get the Analytical Data back. Thanks for your help on this

Lewis R. (Randy) Dade
Environmental Specialist
The HollyFrontier Companies
501 E. Main / P.O. Box 159
Artesia, NM 88210 / 88211-0159
575-746-5281 (o)
575-703-4735 (c)
575-746-5451 (f)
Email: Lewis.Dade@hollyfrontier.com

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., 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 Department

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

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID : 15694
Contact Name: Randy Dade	Contact Telephone: 575-746-5281
Contact email: Lewis.Dade@hollyfrontier.com	Incident # *(assigned by OCD)*
Contact mailing address: P.O.Box 159, Artesia, NM. 88211-0159	

Location of Release Source

Latitude 32.846675 Longitude 104.392311
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: HollyFrontier Navajo Refinery LLC	Site Type: Refinery
Date Release Discovered: 7/05/2020	API# *(if applicable)*

Unit Letter	Section	Township	Range	County
E	8	17S	26E	EDDY

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (*Name:* _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☒ Other (describe) Reverse Osmosis Reject Water (SRO Feed)	Volume/Weight Released (provide units)	**Volume/Weight Recovered (provide units)** 100 bbls Recovered; 98 bbls water & 2 bbls oily residues

Cause of Release: The secondary reverse osmosis unit (SRO) was shut down due to a leak on the outlet piping. The feedwater (primary RO reject) was diverted to the sewer and this caused the sewers in units 34 and 25 to back up. The old crude charge pump basin, which was out of service, filled up and overflowed through a 4" line on the north side of the pump basin. There was some residual oil that was in the sewer box (not sludge) and pump basin that was released with the SRO Water. Oil was less than 2 barrels in basin and sewer box. All other amount was SRO Water, 98 barrels. The release was contained within a depression under an existing pipe rack to the north of the sewer box, south of the process area (see the attached markup of the area). The free liquids were vacuumed as described above, and oily impacted soil was removed and transferred into a hardtop roll-off. All the area around the pump basin was cleaned up and the new RDU construction project has started.

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
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Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release?

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

☒ The source of the release has been stopped.

☒ The impacted area has been secured to protect human health and the environment.

☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:
. The release was contained within a depression under an existing pipe rack to the north of the sewer box, south of the process area (see the attached markup of the area). The free liquids were vacuumed as described above, and oily impacted soil was removed and transferred into a hardtop roll-off. All the area around the pump basin was cleaned up and the new RDU construction project has started. Map of release is attached. Composite samples were collected and sent for analysis. Waiting for results.

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: Lewis R. Dade Title: Environmental Specialist

Signature: _____ Date: 08/05/2020

email: Lewis.Dade@hollyfrontier.com Telephone: 575-746-5281

OCD Only

Received by: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
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Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☒ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: ***Each of the following items must be included in the report.***

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

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Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: _____ Title: _____

Signature:_____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date**:** _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: ***Each of the following items must be included in the plan.***

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: ***Each of the following items must be confirmed as part of any request for deferral of remediation.***

☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.

☐ Extents of contamination must be fully delineated.

☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC

☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)

☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)

☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD 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 OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD 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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

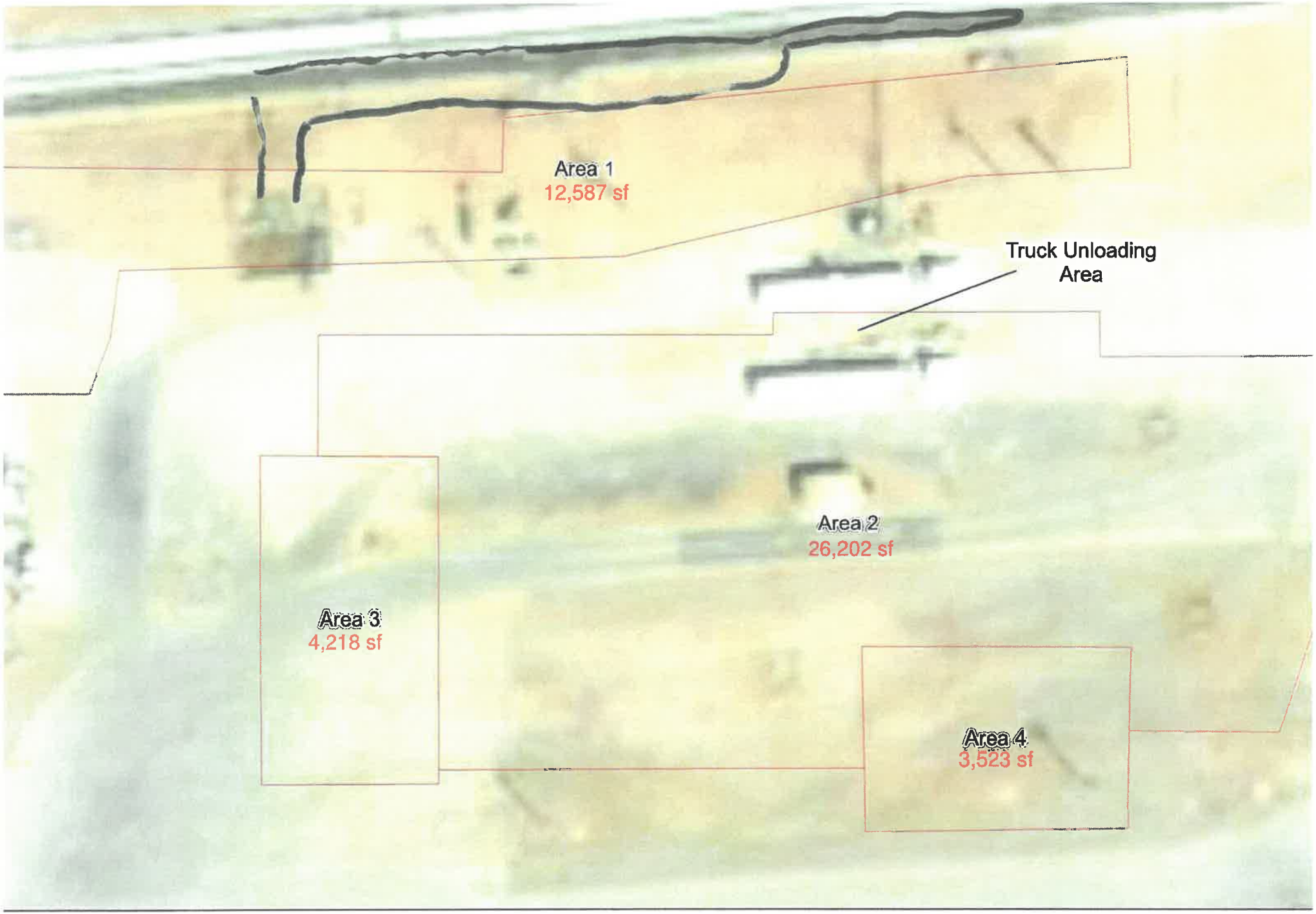
OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____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Truck Unloading
Area
Area 2
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Area 3
4,218 sf
Area 4
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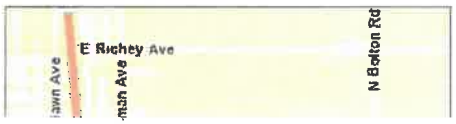
E Richey Ave
N Bolton Rd

Hol

W NW N NE

270 300 330 0 30 60

352°N (T) 32°50'48"N, 104°23'32"W ±656ft 3371ft

17 Aug 2020, 10:46:43

V NW N NE E

70 300 330 0 30 60 90

5°N (T) 32°50'48"N, 104°23'31"W ±42ft 3366ft

17 Aug 2020, 10:46:54

NW N NE E

300 330 0 30 60 90

19°N (T) 32°50'48"N, 104°23'31"W ±22ft 3367ft

17 Aug 2020, 10:47:10