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Annual GW Mon. REPORTS

DATE:
2010



March 23, 2011



MAR 29 2011

Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87505

Mr. Edward Hansen New Mexico Oil Conservation Division Environmental Bureau 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re:

Plains All American – 2010 Annual Monitoring Reports

20 Sites in Lea County, New Mexico

Dear Mr. Hansen:

Plains All American is an operator of crude oil pipelines and terminal facilities in the state of New Mexico. Plains All American actively monitors certain historical release sites exhibiting groundwater impacts, consistent with assessments and work plans developed in consultation with the New Mexico Oil Conservation Division (NMOCD). In accordance with the rules and regulations of the NMOCD, Plains All American hereby submits our Annual Monitoring reports for the following sites:

34 Junc. to Lea Sta.1R-0386′Section 21, Township 20 South, Range 37 East, Lea County34 Junction South1R-0456 ′Section 02, Township 17 South, Range 36 East, Lea CountyBob DurhamAP-0016 ′Section 32, Township 19 South, Range 37 East, Lea CountyDarr Angell #1AP-007 ′Section 11, Township 15 South, Range 37 East, Lea CountyDarr Angell #2AP-007 ′Section 11, Township 15 South, Range 37 East, Lea CountyDarr Angell #4AP-007 ′Section 11, Township 15 South, Range 37 East, Lea CountyDenton Station1R-0234 ′Section 14, Township 15 South, Range 37 East, Lea CountyHDO-90-23AP-009 ∕Section 14, Township 15 South, Range 37 East, Lea County*LF-591R-0103Section 06, Township 20 South, Range 37 East, Lea CountyMonument 21R-0110Section 32, Township 19 South, Range 37 East, Lea CountyMonument 101R-0119Section 30, Township 20 South, Range 37 East, Lea CountyMonument 171R-123Section 29, Township 19 South, Range 37 East, Lea CountyMonument 181R-0124Section 07, Township 20 South, Range 37 East, Lea CountySection 29, Township 19 South, Range 37 East, Lea CountyMonument 181R-0124Section 07, Township 20 South, Range 37 East, Lea CountyMonument 181R-0124Section 07, Township 20 South, Range 37 East, Lea County
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TNM 97-04 GW-0294 Section 11, Township 16 South, Range 35 East, Lea County
TNM 97-17. AP-017 Section 21, Township 20 South, Range 37 East, Lea County
TNM 97-18 AP-0013 Section 28, Township 20 South, Range 37 East, Lea County
TNM 98-05A AP-12 Section 26, Township 21 South, Range 37 East, Lea County



Nova Safety and Environmental (Nova) prepared these documents and has vouched for their accuracy and completeness, and on behalf of Plains All American, I have personally reviewed the documents and interviewed Nova personnel in order to verify the accuracy and completeness of these documents. It is based upon these inquiries and reviews that Plains All American submits the enclosed Annual Monitoring Reports for the above facilities.

If you have any questions or require further information, please contact me at (575) 441-1099.

Sincerely

bason Henry

Remediation Coordinator

Plains All American

CC: Geoff Leking, NMOCD, Hobbs, NM

Enclosures



2010 ANNUAL MONITORING REPORT

SOUTH MONUMENT GATHERING SOUR

NW ¼, NE ¼, SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST LEA COUNTY, NEW MEXICO PLAINS SRS # 2001-11193 NMOCD Reference # 1R-951

PREPARED FOR:

PLAINS MARKETING, L.P.

333 Clay Street, Suite 1600 Houston, Texas 77002



PREPARED BY:

NOVA Safety and Environmental

2057 Commerce Street Midland, Texas 79703

March 2011

Ronald K. Rounsaville Senior Project Manager

President

Brittan K. Byerly, P.Q

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ENCLOSED ON DATA DISK

2010 Annual Monitoring Report

2010 Tables 1, 2 and 3 - Groundwater Elevation, BTEX and PAH Concentration Data

2010 Figures 1, 2A-2D, and 3A-3D

Electronic Copies of Laboratory Reports

Historic Table 1 and 2 – Groundwater Elevation, BTEX and PAH Concentration Table

INTRODUCTION

On behalf of Plains Marketing, L.P. (Plains), NOVA Safety and Environmental (NOVA) is pleased to submit this Annual Monitoring Report in compliance with the New Mexico Oil Conservation Division (NMOCD) letter of May 1998, requiring submittal of an Annual Monitoring Report by April 1 of each year. The South Monument Gathering Sour Site, which was formally the responsibility of EOTT Energy, is now the responsibility of Plains. This report is intended to be viewed as a complete document with text, figures, tables and appendices. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2010 only. However, historic data tables as well as 2010 laboratory analytical reports are provided on the enclosed data disk. A Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each of four quarters in calendar year 2010 to assess the levels and extent of dissolved phase constituents and Phase Separated Hydrocarbon (PSH). The groundwater monitoring events consisted of measuring static water levels in the monitor wells, checking for the presence of PSH and purging and sampling of each well exhibiting sufficient recharge. Monitor wells containing a thickness of PSH greater than 0.01 foot were not sampled.

SITE DESCRIPTION AND BACKGROUND INFORMATION

On November 20, 2001, EOTT Energy, Corp.(EOTT) reported a 1,200 barrel release of sour crude oil from a pipeline located approximately one half mile southwest of Monument, New Mexico. The site is located in the NW ¼ NE ¼, Section 5, Township 20 South, Range 37 East, Lea County, New Mexico. The initial response was conducted by Allstate Environmental Services (AES) in November 2001. According to AES's Summary of Cleanup Activities and Site Delineation (November 27 to December 12, 2001), on November 30, 2001, AES began excavating, stockpiling and transporting impacted soil to the C & C Landfarm. The Release Notification and Corrective Action (Form C-141) is provided as Appendix A. According to documentation prepared by AES, on November 30 and December 1, 2001, approximately 408 cubic yards (cy) of hydrocarbon impacted soil was transported to the landfarm. On December 5, 2001, excavation of the site ceased while EOTT and the landowner (Mr. Jimmy Cooper) entered into negotiations.

On March 3, 2005, NOVA, on behalf of Plains, collected excavation sidewall, floor, stockpile, and flow path soil samples. Stockpile and flow path soil samples were collected as five point composites collected at the surface as well as depths of three, six, twelve and eighteen inches below ground surface (bgs). Soil samples were collected at intervals of approximately 100 linear feet along the flow path and approximately one sample per three hundred square feet in the existing excavation bottom and existing stockpiles.

On July 25, 2006, four soil borings were advanced adjacent to or within the existing excavation to investigate the vertical and horizontal extent of hydrocarbon impact in these areas.

On September 13, 2006, a backhoe was utilized to excavate five investigation trenches along the reported crude oil flow path. The result of trenching activities in the flow path indicated hydrocarbon impact is present at depth, but limited to the lateral extent of the flow path.

On November 30 through December 4, 2006, nine additional soil borings were advanced and three groundwater monitoring wells were installed to further delineate the site. The results of drilling activities indicate hydrocarbon impacted soil is limited to areas immediately adjacent to the leak source and the subsequent flow path.

On August 2, 2010, soil excavation activities began to address the soil remediation at the leak source and flowpath areas. A Soil Closure Report documenting these activities will be submitted to the NMOCD in early 2011.

Currently, three monitor wells are located on site.

FIELD ACTIVITIES

Groundwater Monitoring

During the 2010 reporting period, measurable PSH or hydrocarbon sheen was not observed in any of the site monitor wells. The 2010 gauging data is provided in Table 1.

Quarterly monitoring events for the reporting period were performed according to the following sampling schedule.

Samplin	g Schedule
MW-1	Quarterly
MW-2	Quarterly
MW-3	Quarterly

The site monitor wells were gauged and sampled on February 1, May 4, August 3, and November 3, 2010. During each sampling event, sampled monitor wells were purged a minimum of three well volumes of water or until the wells were dry using a PVC bailer or electrical Grundfos pump. Groundwater was allowed to recharge and samples were collected using disposable Teflon samplers. Water samples were placed in clean glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank and disposed of at a licensed disposal facility.

Locations of the monitor wells and the inferred groundwater gradient, which were constructed utilizing measurements collected during the four quarterly monitoring events, are depicted on Figures 2A through 2D. Groundwater elevation data for 2010 is provided as Table 1. Historic groundwater elevation data beginning at project inception is provided on the enclosed data disk.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.009 feet/foot to the south-southwest as measured between monitor wells MW-2 and MW-1. The corrected groundwater elevation has ranged between 3,530.36 and 3,531.73 feet above mean sea level, in monitor wells MW-1 on August 3, 2010 and MW-2 on February 1, 2010, respectively.

LABORATORY RESULTS

No measurable thicknesses of PSH were reported on any of the monitor wells during the reporting period.

Groundwater samples obtained during the quarterly sampling events of 2010 were delivered to Trace Analysis, Inc. in Midland, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method 8021B. Polynuclear Aromatic Hydrocarbons (PAH) analysis was not conducted during the 2010 calendar year. Based upon historic PAH analytical data, only those wells exhibiting elevated constituent concentrations above WQCC standards will be sampled, with the exclusion of those wells containing measurable PSH thicknesses. A listing of BTEX constituent concentrations for 2010 are summarized in Table 2 and the Historic PAH constituent concentrations are summarized in Table 3. Copies of the laboratory reports generated for 2010 are provided on the enclosed data disk. The quarterly groundwater sample results for BTEX constituent concentrations are depicted on Figures 3A through 3D.

Monitor well MW-1 is sampled on quarterly schedule and the analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 1st and 2nd quarters to 0.140 mg/L during the 3rd quarter of 2010. Benzene concentrations were above NMOCD regulatory standard during the 3rd and 4th quarters of the reporting period. Toluene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. Ethylbenzene concentrations ranged from <0.001 mg/L during the 1st, 2nd and 4th quarters to 0.0109 mg/L during the 3rd quarter of 2010. Ethyl-benzene concentrations were below NMOCD regulatory standard during all four quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 1st, 2nd and 4th quarters to 0.1100 mg/L during the 3rd quarter of 2010. Xylene concentrations were below NMOCD regulatory standard during all four quarters of the reporting period. PAH analysis was not conducted during the 4th quarter sampling event.

Monitor well MW-2 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 1st, 2nd and 3rd quarters to 0.0047 mg/L during the 4th quarter of 2010. Benzene concentrations were below NMOCD regulatory standard during all four quarters of the reporting period. Toluene, ethyl-benzene and xylene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last nine consecutive quarters. PAH analysis was not conducted during the 4th quarter sampling event.

Monitor well MW-3 is sampled on a quarterly schedule and analytical results indicate benzene, toluene, ethyl-benzene and xylene concentrations were below the MDL and NMOCD regulatory standards during all four quarters of the reporting period. The analytical results indicate BTEX constituent concentrations have been below NMOCD regulatory standards for the last eighteen consecutive quarters. PAH analysis was not conducted during the 4th quarter sampling event.

Laboratory analytical results were compared to NMOCD regulatory limits based on the New Mexico groundwater standards found in section 20.6.2.3103 of the New Mexico Administrative Code.

SUMMARY

This report presents the results of monitoring activities for the annual monitoring period of 2010. Currently, there are three groundwater monitor wells (MW-1 through MW-3) on-site. The most recent Groundwater Gradient Map, Figure 2D indicates a general gradient of approximately 0.009 feet/foot to the south-southwest.

Review of laboratory analytical results generated from analysis of the groundwater samples obtained during the 2010 monitoring period indicates benzene is the only BTEX constituent exhibiting concentrations above NMOCD regulatory standards. Benzene concentrations exceeding regulatory guidelines were exhibited in monitor well MW-1 during the 3rd and 4th quarterly sampling events. BTEX constituent concentrations were below NMOCD regulatory standard in the remaining monitor wells during the 2010 reporting period. PAH analysis was not conducted as part of the quarterly sampling event.

ANTICIPATED ACTIONS

Quarterly monitoring and groundwater sampling will continue in 2011. A 2011 annual monitoring report will be submitted to the NMOCD by April 1, 2012.

A Soil Closure Report will be submitted to the NMOCD following the completion of excavation and remediation activities.

LIMITATIONS

NOVA has prepared this Annual Monitoring Report 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 consent of NOVA and/or Plains.

DISTRIBUTION

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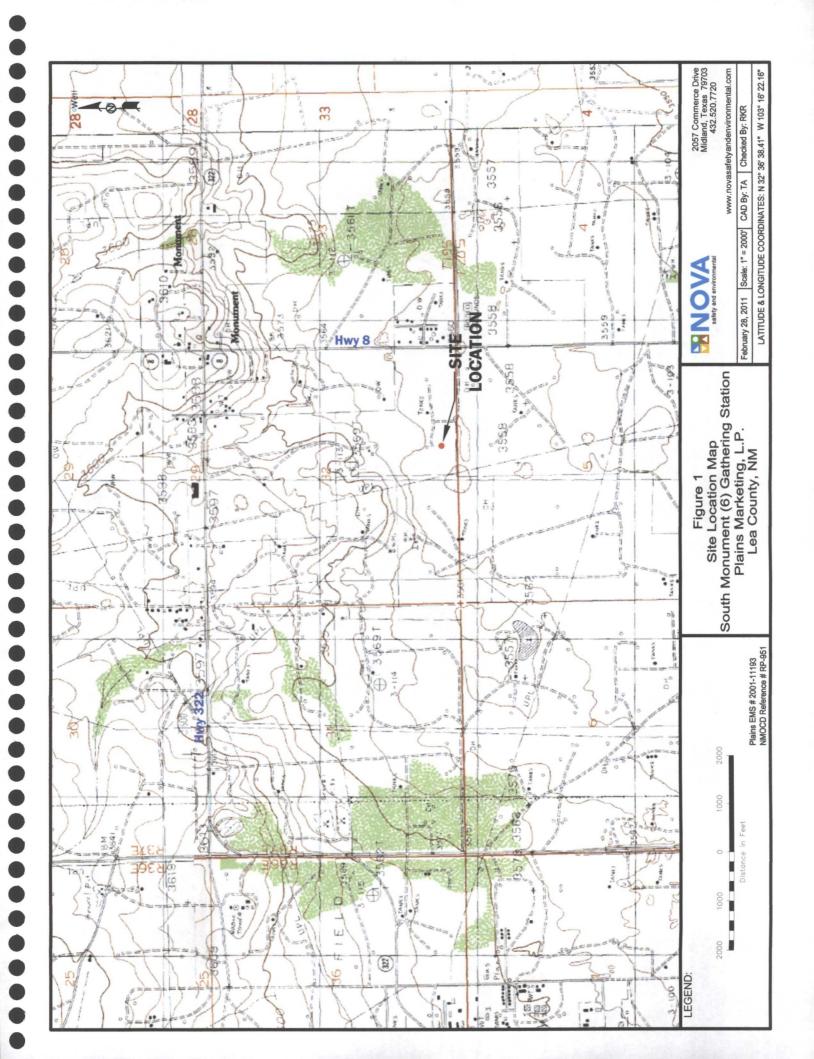
Houston, TX 77002 jpdann@paalp.com

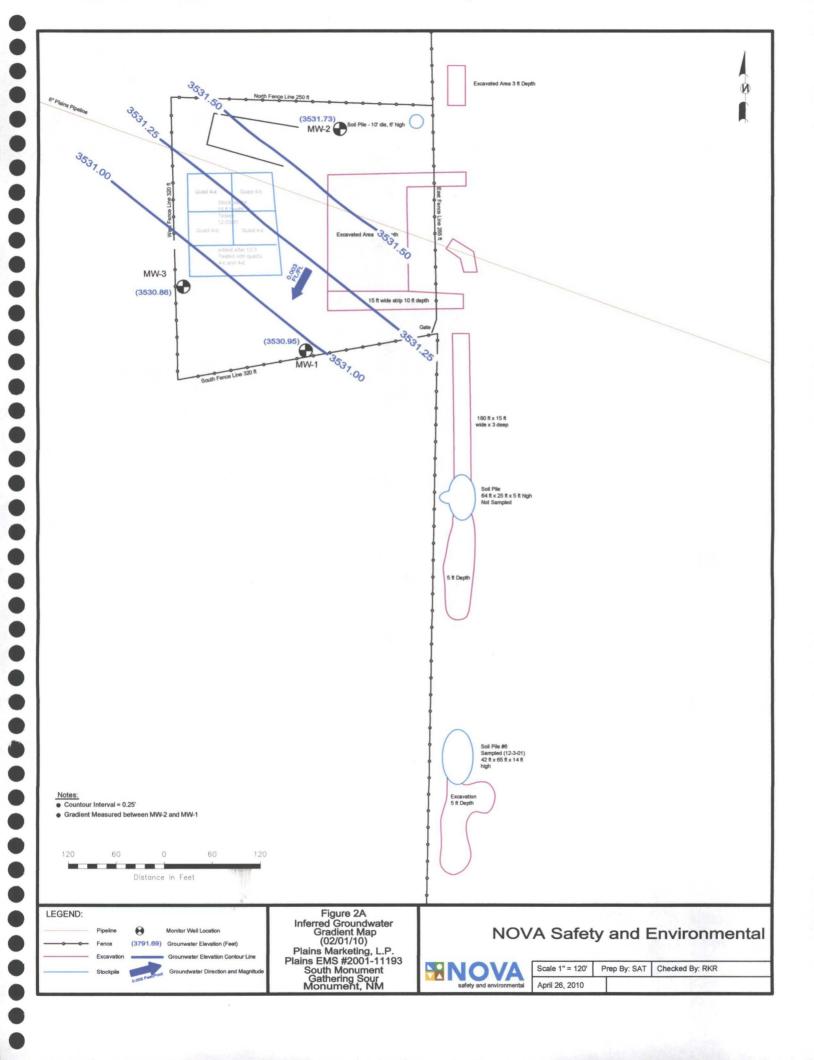
Copy 5: NOVA Safety and Environmental

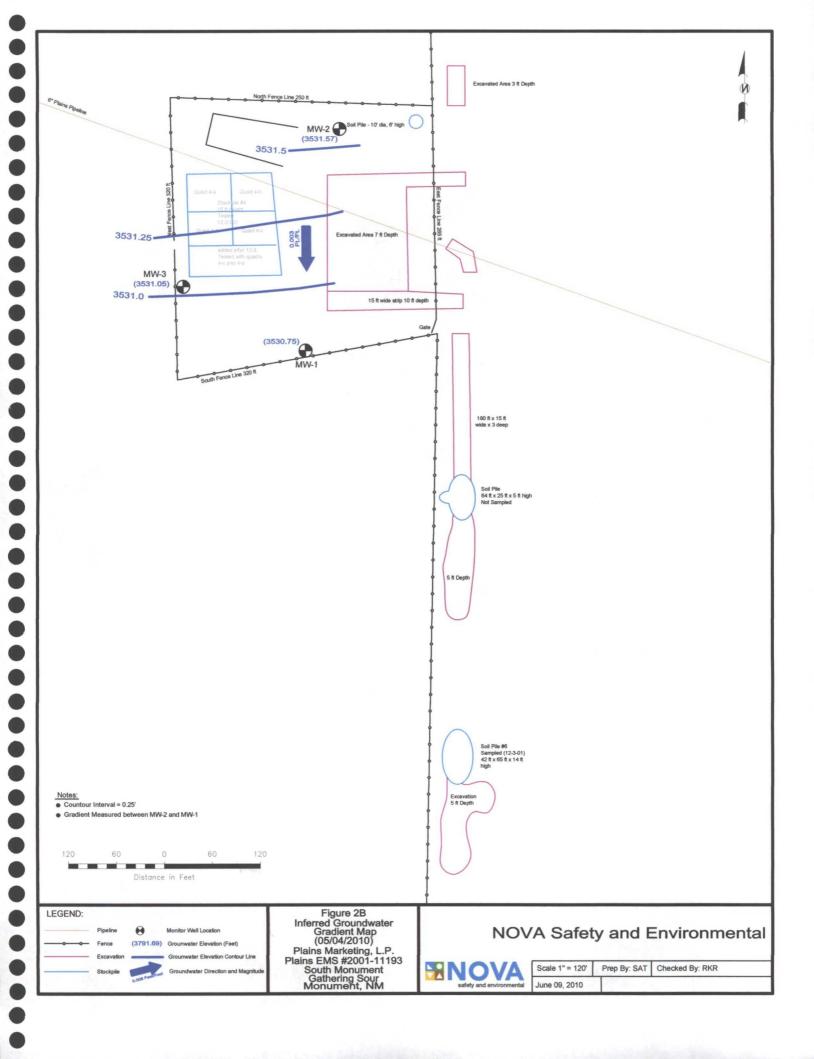
2057 Commerce Street Midland, TX 79703

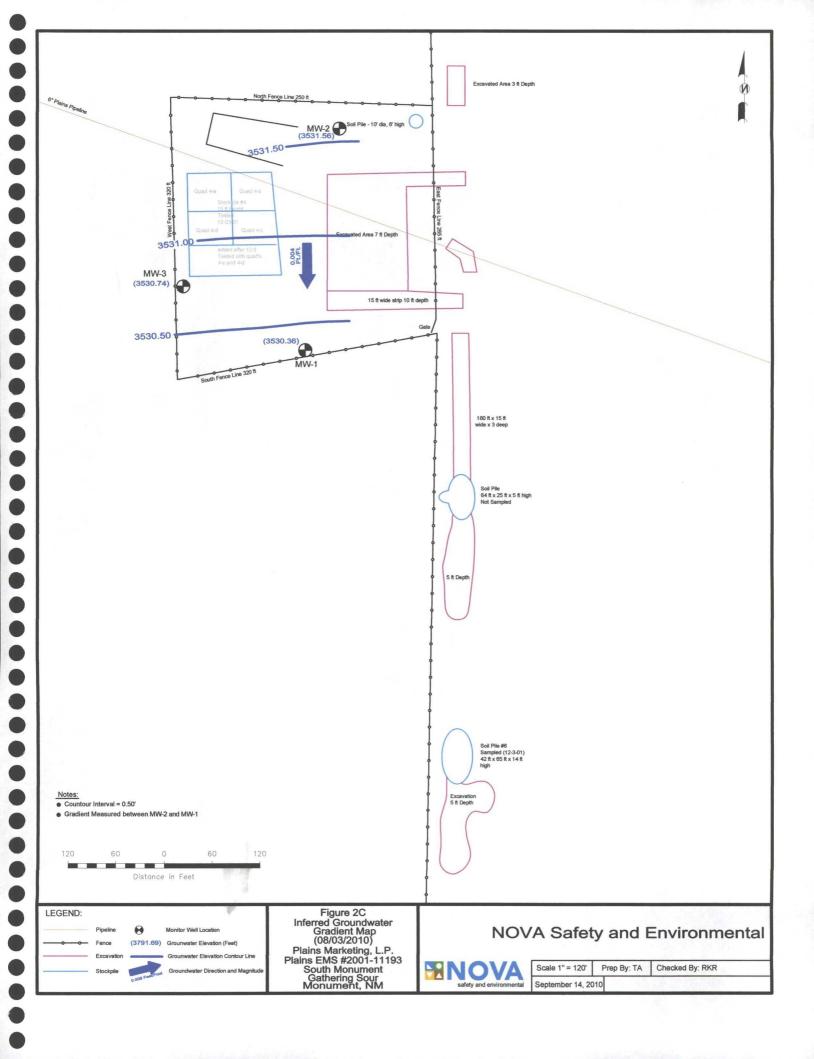
rrounsaville@novatraining.cc

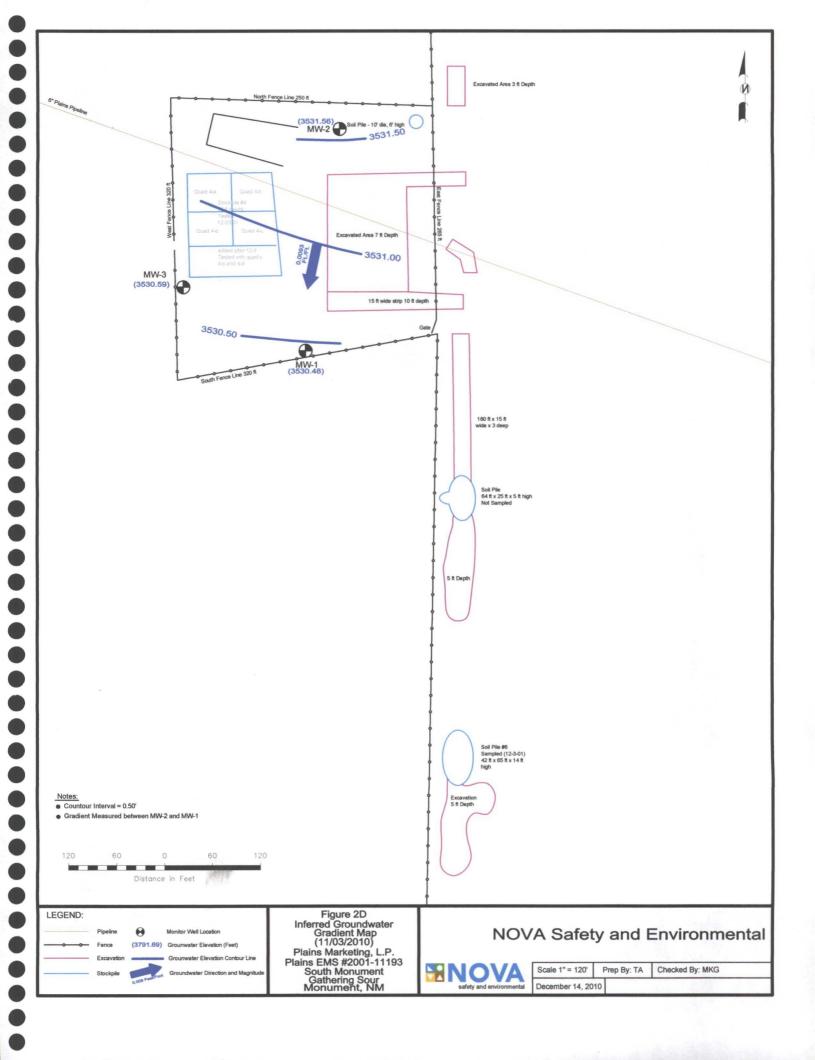
Figures

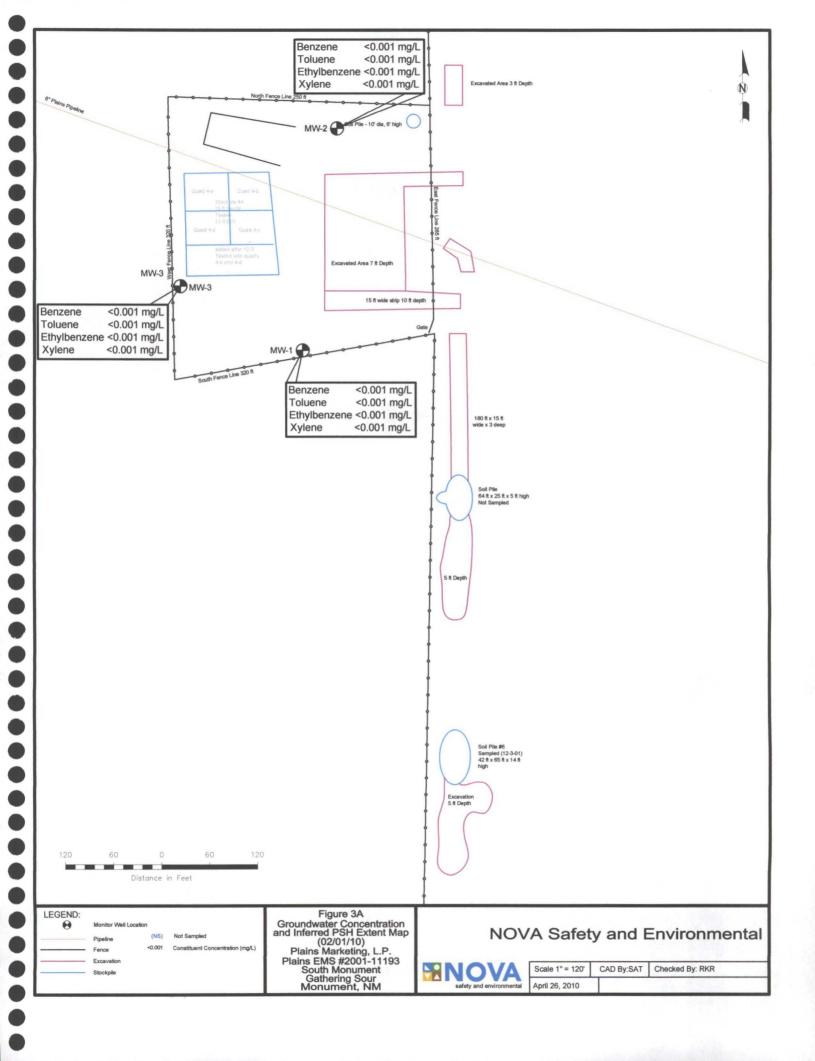


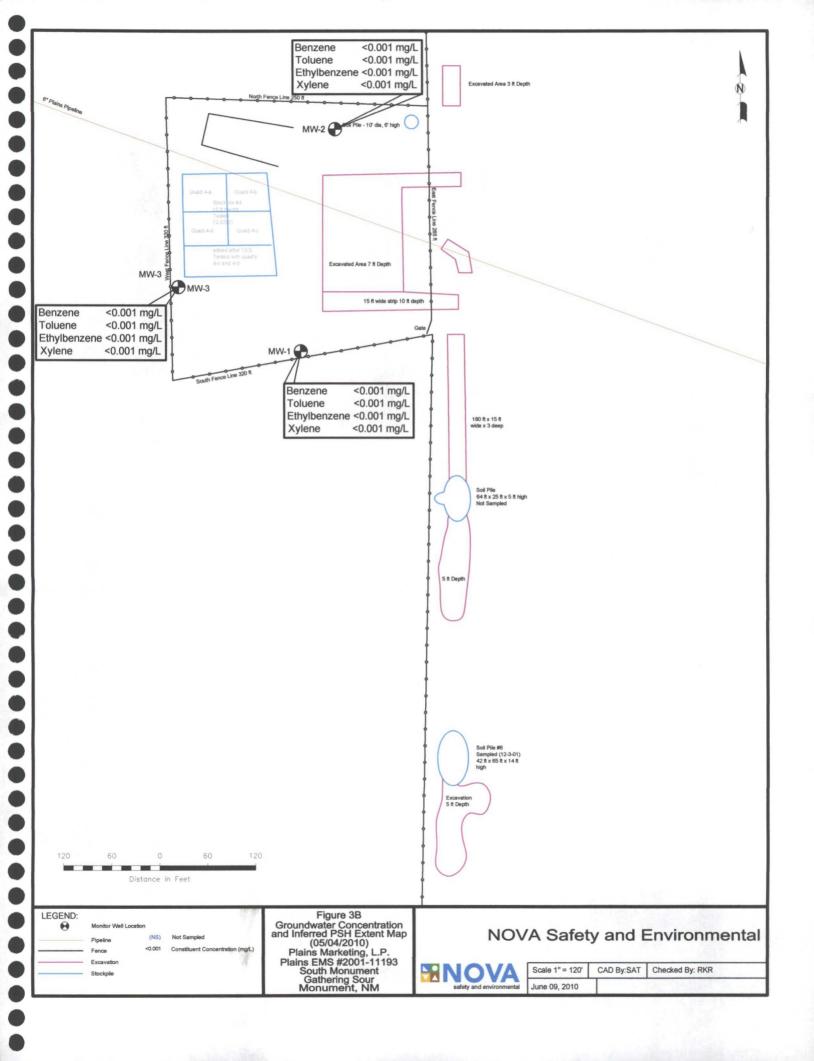


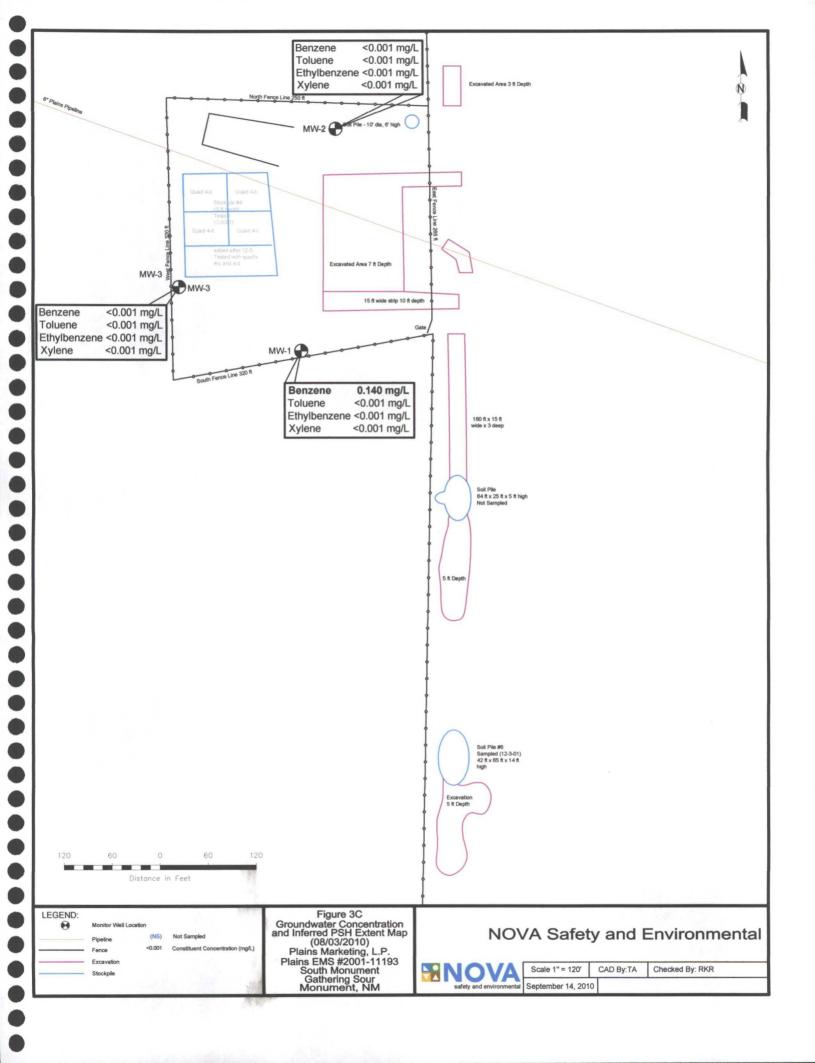


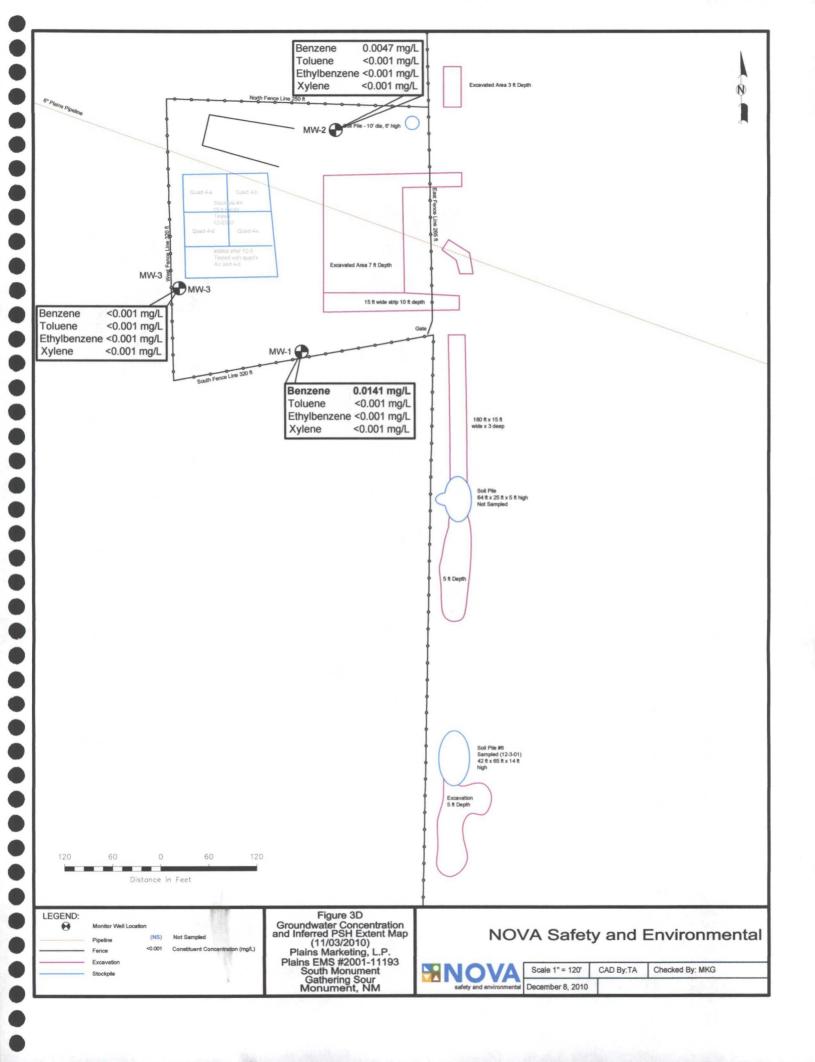












Tables

TABLE 1

GROUNDWATER ELEVATION DATA - 2010

PLAINS MARKETING, L.P. South Monument Gathering Sour LEA COUNTY, NEW MEXICO PLAINS SRS# 2001-11193

WELL NUMBER	DATE MEASURED	CASING WELL ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-1	01/13/10	3,564.20	-	33.64	0.00	3,530.56
MW-1	02/01/10	3,564.20		33.25	0.00	3,530.95
MW-1	05/04/10	3,564.20		33.45	0.00	3,530.75
MW-1	08/03/10	3,564.20	-	33.84	0.00	3,530.36
MW-1	11/03/10	3,564.20	-	33.72	0.00	3,530.48
MW-2	01/13/10	3,563.83	•	32.27	0.00	3,531.56
MW-2	02/01/10	3,563.83	•	32.10	0.00	3,531.73
MW-2	05/04/10	3,563.83		32.26	0.00	3,531.57
MW-2	08/03/10	3,563.83	•	32.27	0.00	3,531.56
MW-2	11/03/10	3,563.83		32.27	0.00	3,531.56
MW-3	01/13/10	3,564.42		33.79	0.00	3,530.63
MW-3	02/01/10	3,564.42		33.56	0.00	3,530.86
MW-3	05/04/10	3,564.42		33.37	0.00	3,531.05
MW-3	08/03/10	3,564.42		33.68	0.00	3,530.74
MW-3	11/03/10	3,564.42		33.83	0.00	3,530.59

^{*} Complete Historical Tables are provided on the attached CD.

TABLE 2

CONCENTRATIONS OF BTEX IN GROUNDWATER - 2010 SOUTH MONUMENT GATHERING SOUR PLAINS MARKETING, L.P. LEA COUNTY, NEW MEXICO Plains SRS# 2001-11193

All concentrations are in mg/kg

Sample Date	Sample Date Sample Location		Toluene	Xylene	BTEX		
NMOCD R	MOCD REGULARY LIMIT		0.750	0.750	0.620		
02/01/10	MW-1	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	
05/04/10	MW-1	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	
08/03/10	MW-1	0.14	< 0.001	0.0109	0.1100	0.2609	
11/03/10	MW-1	0.0141	< 0.001	< 0.001	< 0.001	0.0141	
02/01/10	MW-2	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	
05/04/10	MW-2	<0.001	< 0.001	< 0.001	< 0.001	< 0.001	
08/03/10	MW-2	< 0.001	< 0.001	<0.001	< 0.001	< 0.001	
11/03/10	MW-2	0.0047	< 0.001	< 0.001	< 0.001	0.0047	
02/01/10	MW-3	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	
05/04/10	MW-3	< 0.001	< 0.001	<0.001	< 0.001	< 0.001	
08/03/10	MW-3	< 0.001	< 0.001	<0.001	< 0.001	< 0.001	
11/03/10	MW-3	< 0.001	< 0.001	<0.001	< 0.001	< 0.001	

^{*}Complete Historical Tables are provided on the attached CD.

TABLE 3

POLYCYCLIC AROMATIC HYDROCARBON CONCENTRATIONS IN GROUNDWATER

PLAINS MARKETING, L.P. SOUTH MONUMENT GATHERING SOUR LEA COUNTY, NEW MEXICO NMOCD REFERENCE NUMBER RP #951

All water concentrations are reported in mg/L

	Dibenzoluran		<0.000185	0.000584			<0.000185	<0.000184		<0.000184	<0.000183	
	S-Methylnaphthalene	nəladidqanlydiə1M-2								<0.000184	<0.000183	
	analaninqaniydiaM-i	.1\gm £0.0	0.00357	<0.000184			<0.000185	<0.000184		<0.000184	<0.000183	
	Naphthalene	0.00173	0.00043			<0.000185	<0.000184		<0.000184	<0.000183		
	Pyrene		<0.000185	<0.000184			<0.000185	<0.000184		<0.000184	<0.000183	
	Phenanthrene	0.000758	0.000627			<0.000185	<0.000184		<0.000184	<0.000183		
	ənəTyq(bɔ-ɛ̃,£,£]onəbnl	986								<0.000184	<0.000183	
	Finorene		0.000922	<0.000184			<0.000185 <0.000185	<0.000184 <0.000184		<0.000184	<0.000183	
,3510	anadina Toul A		<0.000185			<0.000185	<0.000184		<0.000184 <0.000184	<0.000183		
EPA SW846-8270C,	Dibenz [a,h] anthracene	.I\gm €000.0	<0.000185		<0.000185	<0.000184		<0.000184	<0.000183			
EPA SV	Chrysene	J\gm 2000.0		<0.000184			<0.000185	<0.000184		<0.000184	<0.000183	
	Benzo[k]fluoranthene	Л\gm £000.0	185				<0.000185	<0.000184	Event.	<0.000184	<0.000183	Event.
	Benzo[g,h,i]perylene		85 <0.000185	84 <0.000184 <0.000184	Not Sampled as part of Quarterly Monitoring Eveni		<0.000185	<0.000184 <0.000184	Not Sampled as part of Quarterly Monitoring Event	<0.000184	<0.000183 <0.000183	erly Monitoring Event
	Вепzo[b]Пиогапthene	.T\gm 2000.0		_	of Quarterly		<0.000185	<0.000184	of Quarterly	<0.000184	<0.000183	of Quarterly
	Benzo[a]pyrene	J\gm \7000.0	<0.000185	<0.000184 <0.000184 <0.000	npled as part		<0.000185 <0.000185 <0.000185 <0.00018	<0.000184 <0.000184 <0.000	npled as part	<0.000184 <0.000184 <0.0001	<0.000183 <0.000183 <0.000	Not Sampled as part of Quart
	Benzo[a]anthracene	J\gm 1000.0	<0.000185		Not Sar		<0.000185		Not Sar	<0.000184		Not Sar
	ənəsaniinA		<0.000185 <0.000185 <0.000185 <0.000185 <0.000185	<0.000184			<0.000185	<0.000184		<0.000184 <0.000184	<0.000183	
	Асепарћіћујепе		<0.000185	<0.000184			<0.000185	<0.000184		<0.000184	<0.000183	
	энэйлицепээ.А	<0.000185	<0.000184			<0.000185	<0.000184		<0.000184	<0.000183		
	SAMPLE	ntaminant M WQCC r tions 1-	11/02/08	11/19/09	11/03/10		11/05/08	11/19/09	11/03/10	11/05/08	11/19/09	11/03/10
	SAMPLE	Maximum Contaminant Levels from NM WQCC Drinking water standards Sections 1-101. UU and 3-103. A.	MW-1				MW-2			MW-3		

Appendices

Appendix A
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
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

					OPER!	TOR		x Initi	al Report		Final Report			
Name of Company Plains Marketing, LP							nille Reynolds							
Address 5805 East Hwy. 80, Midland, TX 79706						Telephone No. 505-441-0965								
Facility Nar	me South I	Monument G	Sour		Facility Type 6"Steel Pipeline									
Surface Ow	ner Jimmi	e Cooper	Mineral O	wner	er Lease No.									
				LOCA	TION	OF RE	LEASE			•				
Unit Letter B	Section 5	Township 20S	Range 37E	Feet from the	North/South Line Feet from the East/West Line County Lea									
Latitude 32° 36'29.0" Longitude 103° 16' 26.8"														
				NAT	URE	OF REL	EASE							
Type of Rele							Release 1200 bar			Recovered 91		els		
Source of Re	lease 6" Ste	el Pipeline				11-20-01	Iour of Occurrence	e	Date and 11-20-01	Hour of Dis	covery			
Was Immedia	ate Notice (Yes 🗌	No Not Req	uired	If YES, To Paul Sheel								
By Whom? F							lour 11-20-01@1							
Was a Water	course Read	ched?	Yes 🗵] No		If YES, Volume Impacting the Watercourse.								
Describe Are Initial respon	tigate the re a Affected ase activities	elease. and Cleanup As included exc	Action Tak avation an	n Taken.* Interna	il was v pproxim	acuumed up ately 5,000 t	and the impacted	soil was	s excavated	and stockpi	led on p	plastic.		
NOTE: This information	information to be corre	on was obtain ect.	ed from l	historical EOTT :	files, Pla	ains acquire								
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.									ndanger `liability man health					
							OIL CONSERVATION DIVISION							
Signature:														
Printed Name: Camille Reynolds Approved by District Supervisor:														
Title: Remed	iation Coor	dinator				Approval Da	e:		Expiration	Date:				
E-mail Addre	ess: cjreyno	lds@paalp.co	n		•	Conditions of Approval: Attached								

Phone:505-441-0965

^{*} Attach Additional Sheets If Necessary