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REPORTS

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2006 ANNUAL MONITORING REPORT

LEA STATION TO MONUMENT 6 INCH

NE ¼ SE ¼ of SECTION 5, TOWNSHIP 20 SOUTH, RANGE 37 EAST LEA COUNTY, NEW MEXICO PLAINS EMS NUMBER: 2001-11056 NMOCD File Number 1R-0404

PREPARED FOR:

PLAINS MARKETING, L.P. 333 CLAY STREET SUITE 1600 HOUSTON, TEXAS 77022

PREPARED BY:

NOVA Safety and Environmental 2057 Commerce Midland, Texas 79703

March 2007

Curt D. Stanley

Project Manager

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Figure 1 – Site Location Map

- Figure 2A Inferred Groundwater Gradient Map March 13, 2006
 - 2B Inferred Groundwater Gradient Map June 12, 2006

2C - Inferred Groundwater Gradient Map September 5, 2006

2D - Inferred Groundwater Gradient Map November 27, 2006

Figure 3A - Groundwater Concentration and Inferred PSH Extent Map March 13, 2006

- 3B Groundwater Concentration and Inferred PSH Extent Map June 12, 2006
- 3C Groundwater Concentration and Inferred PSH Extent Map September 5, 2006
- 3D Groundwater Concentration and Inferred PSH Extent Map November 27, 2006

TABLES

Table 1 – 2006 Groundwater Elevation Data

Table 2 – 2006 Concentrations of BTEX in Groundwater

APPENDICES

Appendix A – Release Notification and Corrective Action (Form C-141)

ENCLOSED ON DATA DISK

2006 Annual Monitoring Report 2006 Tables 1 and 2 - Groundwater Elevation and BTEX Concentration Data 2006 Figures 1, 2A-2D, and 3A-3D Electronic Copies of Laboratory Reports Historic Groundwater Elevation Tables Historic BTEX Concentration Tables

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. Beginning on May 29, 2004, project management responsibilities were assumed by NOVA, having previously been managed by Environmental Technology Group, Inc. (ETGI). The Lea Station to Monument 6-Inch site, formally the responsibility of Enron Oil Trading and Transportation (EOTT) is now the responsibility of Plains. This report is intended to be viewed as a complete document with figures, attachments, tables and text. The report presents the results of the quarterly groundwater monitoring events conducted in calendar year 2006 only. For reference, the Site Location Map is provided as Figure 1.

Groundwater monitoring was conducted during each quarter of 2006 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

The legal description of the site is NE $\frac{1}{4}$ of the SE $\frac{1}{4}$ of Section 5, Township 20 South, Range 37 East, Lea County, New Mexico. A three (3) barrel release, with no recovery occurred on August 3, 2001. The surface expression of the release resulted in an irregularly shaped stained surface area measuring approximately 175 feet in length by 30 feet in width. EOTT conducted emergency response actions by excavating impacted soil from around the pipeline, locating the release point and repairing the pipeline. The Release Notification and Corrective Action (Form C-141) is provided as Appendix A

Currently, there are nine (9) monitor wells (MW-1 through MW-9) on site.

FIELD ACTIVITIES

During the 2006 reporting period, measurable PSH was not observed in any of the site monitor wells. Monitor wells MW-2 and MW-3 exhibited a sheen during the 1st and 2nd quarters of 2006, while monitor well MW-5 exhibited a sheen when gauged during 1st and 3rd quarter sampling activities. No sheen was reported in any of the site monitor wells during the 4th quarter 2006 sampling event. The 2006 gauging data is provided in Table 1.

In previous correspondence dated April 28, 2004, the NMOCD approved the current sampling schedule. The table below illustrates the current schedule.

NMOCD APPROVED	SAMPLING SCHEDULE
Sample Location	Sampling Schedule
MW-1 .	Annually
MW-2	Quarterly
MW-3	Annually
MW-4	Annually
MW-5	Quarterly
MW-6	Semi-Annually
MW-7	Quarterly
MW-8	Quarterly
MW-9	Quarterly

The site monitor wells were gauged and sampled on March 13, June 12, September 5, and November 27, 2006. During each sampling event, the monitor wells were purged of approximately three well volumes of water or until the wells were dry using a disposable polyethylene bailer or electrical Grundfos pump. Groundwater was allowed to recharge and samples were obtained using disposable Teflon samplers. Water samples were collected in clean glass containers provided by the laboratory and placed on ice in the field. Purge water was collected in a polystyrene tank ad disposed of by Key Energy utilizing a licensed disposal facility (NMOCD AO SWD-730).

Locations of the monitor wells and the inferred groundwater gradient, constructed from measurements collected during quarterly sampling events, are depicted on Figures 2A-2D, the Inferred Groundwater Gradient Maps. The 2006 groundwater elevation data is provided as Table 1. The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.0004 feet/foot to the east-southeast as measured between monitor wells MW-2 and MW-9. This is consistent with data presented on Figures 2A through 2C from earlier in the year. The corrected groundwater elevations ranged between 3528.44 to 3531.80 feet above mean sea level, in monitor wells MW-5, MW-6 and MW-9 on September 5, 2006 and in monitor well MW-5 on July 19, 2006, respectively.

LABORATORY RESULTS

During the 2006 reporting period, measurable PSH was not observed in any of the site monitor wells.

Groundwater samples obtained during 2006 groundwater sampling events were delivered to Trace Analysis of Lubbock, Texas for determination of Benzene, Toluene, Ethylbenzene and Xylene (BTEX) constituent concentrations by EPA Method SW 846-8021b. A listing of BTEX constituent concentrations for 2006 is summarized in Table 2 and electronic copies of the laboratory reports from this reporting period are provided on the enclosed data disk. The quarterly groundwater sample results for BTEX constituent concentrations are depicted on Figures 3A-3D.

Monitor well MW-1 is sampled on an annual schedule and analytical results indicate benzene, toluene and ethylbenzene constituent concentrations were below laboratory method detection limits (MDL) and NMOCD regulatory standards for each BTEX constituent during the 4th quarter sampling event. The analytical results for xylene indicate a concentration of 0.0042 mg/L (below NMOCD regulatory standards) during the 4th quarter of the reporting period.

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Monitor well MW-2 is sampled on a quarterly schedule and analytical results indicate benzene and toluene constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the four (4) quarterly sampling events. Ethylbenzene concentrations ranged from <0.001 mg/L during the 1st, 2nd and 4th quarters to 0.0015 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Xylene concentrations ranged from <0.001 mg/L during the 1st, 2nd and 4th quarters to 0.0014 mg/L during the 3rd quarter of 2006. Xylene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period.

Monitor well MW-3 is sampled on an annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 4th quarter sampling event.

Monitor well MW-4 is sampled on an annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 4th quarter sampling event.

Monitor well MW-5 is sampled on a quarterly schedule and analytical results indicate benzene concentrations ranged from <0.001 mg/L during the 1st and 3rd quarters to 0.005 mg/L during the 2^{nd} quarter of 2006. Benzene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Toluene constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of the reporting period. Ethylbenzene concentrations ranged from 0.0035 mg/L during the 1st quarter to 0.0146 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Xylene concentrations ranged from 0.0034 mg/L during the 1st quarter to 0.0306 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations were below NMOCD regulatory standards during all four (4) quarters of the reporting period. Xylene concentrations ranged from 0.0034 mg/L during the 1st quarter to 0.0306 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations during all four (4) quarters of the reporting period. Xylene concentrations ranged from 0.0034 mg/L during the 1st quarter to 0.0306 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations during all four (4) quarters of the reporting period. Xylene concentrations ranged from 0.0034 mg/L during the 1st quarter to 0.0306 mg/L during the 3rd quarter of 2006. Ethylbenzene concentrations during all four (4) quarters of the reporting period.

Monitor well MW-6 is sampled on a semi-annual schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during the 2nd and 4th quarter sampling events.

Monitor well MW-7 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of the reporting period.

Monitor well MW-8 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of the reporting period.

Monitor well MW-9 is sampled on a quarterly schedule and analytical results indicate BTEX constituent concentrations were below MDL and NMOCD regulatory standards for each BTEX constituent during all four (4) quarters of the reporting period.

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 groundwater monitoring activities for the annual monitoring period 2006. As discussed above, none of the site monitor wells exhibited measurable PSH during the reporting period.

The most recent Groundwater Gradient Map, Figure 2D, indicates a general gradient of approximately 0.004 feet/foot to the east-southeast as measured between monitor wells MW-2 and MW-9.

As discussed above, BTEX constituent concentrations were below NMOCD regulatory standards in all nine (9) monitor wells during the 2006 reporting period.

ANTICIPATED ACTIONS

Quarterly groundwater monitoring, gauging and sampling will continue. Pending favorable analytical results of the 2^{nd} quarter 2007 sampling event, Plains anticipates submitting a groundwater closure request to the NMOCD.

Plains submitted a *Soil Remediation Work Plan* to the NMOCD in June 2006 to address the remaining hydrocarbon impacted soil onsite. To date, Plains has not received a response from the NMOCD as to the status of the Work Plan.

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

- Copy 1 Ben Stone New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505
- Copy 2: Larry Johnson and Patricia Caperton New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division, District 1 1625 French Drive Hobbs, NM 88240
- Copy 3: Camille Reynolds Plains Marketing, L.P. 3112 Highway 82 Lovington, NM cjreynolds@paalp.com
- Copy 4: Jeff Dann Plains Marketing, L.P. 333 Clay Street Suite 1600 Houston, TX 77002 jpdann@paalp.com
- Copy 5: NOVA Safety and Environmental 2057 Commerce Street Midland, TX 79703 cstanley@novatraining.cc

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2006 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P. LEA STATION TO MONUMENT 6" PIPELINE LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-1	03/13/06	3562.67	-	33.61	0.00	3529.06
	06/12/06	3562.67	_	33.81	0.00	3528.86
	09/05/06	3562.67	-	34.21	0.00	3528.46
	11/27/06	3562.67	-	32.75	0.00	3529.92
MW-2	01/18/06	3563.00	Sheen	34.01	0.00	3528.99
	02/15/06	3563.00	Sheen	33.95	0.00	3529.05
	03/13/06	3563.00	Sheen	33.94	0.00	3529.06
	03/20/06	3563.00	Sheen	33.90	0.00	3529.10
	04/19/06	3563.00	Sheen	33.88	0.00	3529.12
	05/24/06	3563.00	Sheen	33.96	0.00	3529.04
	06/12/06	3563.00	Sheen	34.14	0.00	3528.86
	09/05/06	3563.00	_	34.52	0.00	3528.48
	11/27/06	3563.00	-	33.08	0.00	3529.92
MW-3	01/18/06	3562.60	Sheen	33.63	0.00	3528.97
	02/15/06	3562.60	Sheen	33.57	0.00	3529.03
	03/13/06	3562.60	-	33.54	0.00	3529.06
	03/20/06	3562.60	Sheen	33.52	0.00	3529.08
	04/19/06	3562.60	Sheen	33.49	0.00	3529.11
	05/24/06	3562.60	Sheen	33.59	0.00	3529.01
	06/12/06	3562.60	-	33.75	0.00	3528.85
	06/05/06	3562.60	-	34.15	0.00	3528.45
	11/27/06	3562.60	-	32.69	0.00	3529.91
MW-4	03/13/06	3562.85	-	33.80	0.00	3529.05
	06/12/06	3562.85	-	34.02	0.00	3528.83
	09/05/06	3562.85	-	34.40	0.00	3528.45
	11/27/06	3562.85	-	32.93	0.00	3529.92
MW-5	03/13/06	3564.21	Sheen	35.14	0.00	3529.07
	06/12/06	3564.21	_	35.36	0.00	3528.85
	07/19/06	3564.21	-	32.41	0.00	3531.80
	09/05/06	3564.21	Sheen	35.77	0.00	3528.44
	11/27/06	3564.21	-	34.30	0.00	3529.91
MW-6	03/13/06	3563.29	-	34.24	0.00	3529.05
	06/12/06	3563.29	-	34.44	0.00	3528.85
	00/05/06	3563.20	i	34.85	0.00	3578 11

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2006 GROUNDWATER ELEVATION DATA

PLAINS MARKETING, L.P. LEA STATION TO MONUMENT 6" PIPELINE LEA COUNTY, NEW MEXICO

SAMPLE LOCATION	SAMPLE DATE	TOP OF CASING ELEVATION	DEPTH TO PRODUCT	DEPTH TO WATER	PSH THICKNESS	CORRECTED GROUNDWATER ELEVATION
MW-6	11/27/06	3563.29	-	33.42	0.00	3529.87
MW-7	03/13/06	3562.79	-	33.73	0.00	3529.06
	06/12/06	3562.79	-	33.93	0.00	3528.86
	09/05/06	3562.79	-	34.34	0.00	3528.45
	11/27/06	3562.79	-	32.88	0.00	3529.91
MW-8	03/13/06	3563.79	-	34.70	0.00	3529.09
	06/12/06	3563.79	-	34.93	0.00	3528.86
	09/05/06	3563.79	-	35.28	0.00	3528.51
	11/27/06	3563.79	_	33.85	0.00	3529.94
MW-9	03/13/06	3563.91	-	34.85	0.00	3529.06
	06/12/06	3563.91	-	35.05	0.00	3528.86
	09/05/06	3563.91	_	35.47	0.00	3528.44
	11/27/06	3563.91	-	34.02	0.00	3529.89

Elevations based on the North American Vertical Datum of 1929.

2006 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P. LEA STATION TO MONUMENT 6" PIPELINE LEA COUNTY, NEW MEXICO

All concentrations are reported in mg/L

			sv	V 846-8021B, 50	30	
SAMPLE LOCATION	SAMPLE DATE	BENZENE	TOLUENE	ETHYL- BENZENE	m, p - XYLENES	o - XYLENE
NMOCD REG LIN	GULATORY 11T	0.01	0.75	0.75	0.0	62
MW-1	03/13/06	Not Sampled	on Current S	ample Schedu	le	
	06/12/06	Not Sampled	on Current S	ample Schedu	le	
	09/05/06	Not Sampled	on Current S	ample Schedu	le	
	11/27/06	< 0.001	< 0.001	<0.001	0.00	042
MW-2	03/13/06	< 0.001	< 0.001	< 0.001	<0.	001
	06/12/06	< 0.001	< 0.001	< 0.001	<0.	001
	09/05/06	< 0.001	< 0.001	0.0015	0.0	014
	11/27/06	< 0.001	< 0.001	< 0.001	<0.	001
MW-3	03/13/06	Not Sampled	on Current S	ample Schedu	le	
	06/12/06	Not Sampled	on Current S	ample Schedu	le	
	09/05/06	Not Sampled	on Current S	ample Schedu	le	
· · · · · · · · · · · · · · · · · · ·	11/27/06	< 0.001	< 0.001	< 0.001	<0.	001
MW-4	03/13/06	Not Sampled	on Current S	ample Schedu	le	
	06/12/06	Not Sampled	on Current S	ample Schedu	lle	
	09/05/06	Not Sampled	on Current S	ample Schedu	ile	
····-	11/27/06	< 0.001	< 0.001	<0.001	<0.	001
	1					
MW-5	03/13/06	< 0.001	< 0.001	0.0035	0.0	034
	06/15/06	0.005	< 0.001	0.0107	0.0	178
	09/05/06	< 0.001	< 0.001	0.0146	0.0	306
	11/27/06	0.003	< 0.001	0.0051	0.0	044
		1				
MW-6	03/13/06	Not Sampled	on Current S	ample Schedu	le	
	06/12/06	< 0.001	< 0.001	<0.001	<0.	001
	09/05/06	Not Sampled	on Current S	ample Schedu	le	
	11/27/06	< 0.001	< 0.001	<0.001	<0.	001
MW-7	03/13/06	< 0.001	< 0.001	< 0.001	<0.	001
**	06/12/06	< 0.001	< 0.001	< 0.001	<0.	001
	09/05/06	< 0.001	< 0.001	<0.001	<0.	001
	11/27/06	<0.001	<0.001	<0.001	<0.	001
	11/21/00			01002		

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2006 CONCENTRATIONS OF BTEX IN GROUNDWATER

PLAINS MARKETING, L.P. LEA STATION TO MONUMENT 6" PIPELINE LEA COUNTY, NEW MEXICO

		SV	V 846-8021B, 50.	30	
SAMPLE DATE	BENZENE	TOLUENE	ETHYL- BENZENE	m, p - XYLENES	o - XYLENE
GULATORY AIT	0.01	0.75	0.75	0.0	52
03/13/06	< 0.001	< 0.001	< 0.001	<0.	001
06/12/06	< 0.001	< 0.001	< 0.001	<0.0	001
09/05/06	< 0.001	< 0.001	< 0.001	<0.0	001
11/27/06	< 0.001	< 0.001	< 0.001	<0.0	001
03/13/06	< 0.001	< 0.001	. <0.001	<0.0	001
06/12/06	< 0.001	< 0.001	< 0.001	<0.0	001
09/05/06	< 0.001	< 0.001	< 0.001	<0.0)01
11/27/06	< 0.001	< 0.001	< 0.001	<0.0	001
	SAMPLE DATE GULATORY MIT 03/13/06 06/12/06 09/05/06 11/27/06 03/13/06 06/12/06 09/05/06 11/27/06	SAMPLE DATE BENZENE GULATORY MIT 0.01 03/13/06 <0.001	SAMPLE DATE SN BENZENE TOLUENE GULATORY MIT 0.01 0.75 03/13/06 <0.001	SW 846-8021B, 50 SAMPLE DATE SW 846-8021B, 50 BENZENE TOLUENE ETHYL- BENZENE GULATORY AIT 0.01 0.75 0.75 03/13/06 <0.001	SAMPLE DATE BENZENE TOLUENE ETHYL- BENZENE m, p - XYLENES GULATORY AIT 0.01 0.75 0.75 0.0 03/13/06 <0.001

All concentrations are reported in mg/L

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APPENDICES

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

State of New Mexico Energy Minerals and Natural Resources

Form C-141 Revised October 10, 2003

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

		Rele	ease Notifi	catio	on and Co	orrective A	ction				
					OPER A	ATOR		x Initia	al Report		Final Re
Name of Company	Plains	Pipeline,	LP		Contact:	Camil	le Reyno	olds			
Address: 37	05 E. Hwy 158	8, Midlan	nd, TX 79706		Telephone l	No. 505-4	41-0965				
Facility Name	Lea to N	Monumer	nt 6"		Facility Typ	be: 6" Stee	el Pipelin	ne			
Surface Owner:	Laughlin Esta	te	Mineral	Owner				Lease N	ło.		. <u></u>
	Duughin 20tu					TRACE					
[Init Letter Section	Township	Pange	LUC.	A I IC	h/South Line	LEASE Feet from the	East/W	lest Line	County		
I 5	20S	37E	reet nom me	Non	ii/South Line	Teet nom me	Lasu	est Line	Lea		
		Latitu	de 32 degrees	36° 06.	4" Longitud	le 103 degrees	15' 56.1'	,			
		Dumu	NIA -			FACE	<u></u>	-			
Temp of Dolores Crew			NA.	IUKI	Volume of	EASE	10	Volumo I	Decovered () homol	~
Source of Release: Cruc	Steel Pipeline				Date and H	Hour of Occurren	Ce	Date and	Hour of Di	Scovers	<u>,</u>
Source of Release: 0	Steel Fipenne				8/03/01		ie –	14:00		scovery	
Was Immediate Notic	e Given? Y	Tes 🗌 N	No 🔲 Not Req	uired	If YES, To	Whom?					
By Whom?					Date and H	lour					-
Was a Watercourse Re	eached?	Yes D	No		If YES, Vo	olume Impacting	the Wate	rcourse.			
If a Watercourse was	mpacted, Descr	ibe Fully.	*							- - -	
If a Watercourse was Describe Cause of Pro Describe Area Affecto	impacted, Descr blem and Reme d and Cleanup 4	ibe Fully. dial Actio Action Tal	* n Taken.* Interna ken.* A clamp wa	al corre as insta	ision of 6" stee	l pipeline. A clan	np was in elease. T	stalled on he aerial e	the line to r	mitigate	e the release
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