

# *Basin Environmental Service Technologies, LLC*

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P. O. Box 301  
Lovington, New Mexico 88260

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## **REMEDIATION SUMMARY AND SITE CLOSURE REQUEST**

**BOPCO, LP**  
**POKER LAKE UNIT #411 TANK BATTERY FLARE RELEASE**  
**Eddy County, New Mexico**  
**Unit Letter "B" (NW/NE), Section 28, Township 24 South, Range 31 East**  
**Latitude 32.193096° North, Longitude 103.780815° West**  
**NMOCD Reference #2RP-2266**

Prepared For:

**BOPCO, LP**  
522 W. Mermod, Suite 704  
Carlsbad, New Mexico 88220

Prepared By:

Basin Environmental Service Technologies, LLC  
3100 Plains Highway  
Lovington, New Mexico 88260

**August 2014**

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Joel W. Lowry

Project Manager

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## **1.0 INTRODUCTION & BACKGROUND INFORMATION**

Basin Environmental Service Technologies, LLC (Basin), on behalf of BOPCO, LP (BOPCO), has prepared this *Remediation Summary and Site Closure Request* for the release site known as Poker Lake Unit #411 Tank Battery Flare Release (PLU #411 Flare Release). The legal description of the release site is Unit Letter "B" (NW/NE), Section 28, Township 24 South, Range 31 East, in Eddy County, New Mexico. The geographic coordinates of the release site are 32.193096° North latitude and 103.780815° West longitude. The property affected by the release is owned by the United States Department of the Interior - Bureau of Land Management (BLM). A "Site Location Map" is provided as Figure 1.

On February 8, 2014, BOPCO discovered a release had occurred on the flare line at the PLU #411 Tank Battery. The release was attributed to the scrubber valve being closed, causing the vessels to pressure up, sending approximately ten barrels (10 bbls) of crude oil out of the flare line. The New Mexico Oil Conservation Division (NMOCD) Artesia District Office and BLM were notified immediately upon discovery. The "Release Notification and Corrective Action" (Form C-141) indicated the release impacted an area measuring approximately three hundred feet (300') by one thousand, three hundred feet (1,300') with a fine mist that covered the vegetation and the surface of the soil with less than one-eighth of an inch (1/8") of saturation. The spill also misted just the vegetation in an area measuring approximately four hundred (400') feet by one thousand, eight hundred feet (1,800').

During initial response activities, the vegetation in the immediate area around the flare line was washed down with a soap and Micro-Blaze® solution on April 9, 2014. The site was revisited on April 23, 2014, and there was no residue visible on the soil surface and only light to no residue visible on the vegetation. There was no dead vegetation observed. The Form C-141 is provided as Appendix A. General photographs of the release site are provided as Appendix B.

## **2.0 NMOCD SITE CLASSIFICATION**

A search of the New Mexico Water Rights Reporting System (NMWRRS) database maintained by the New Mexico Office of the State Engineer (NMOSE) indicated information was unavailable for Section 28, Township 24 South, Range 31 East. A depth to groundwater reference map utilized by the NMOCD indicates groundwater should be encountered at approximately three hundred and fifty feet (350') below ground surface (bgs). Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

A search of the NMWRRS database indicated there are no water wells within one thousand feet (1,000') of the release. Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

There are no surface water bodies within one thousand feet (1,000') of the release. Based on the NMOCD ranking system, zero (0) points will be assigned to the site as a result of this criterion.

NMOCD guidelines indicate the PLU #411 Flare Release site has an initial ranking score of zero (0) points. The soil remediation levels for a site with a ranking score of zero (0) points are as follows:

- Benzene – 10 mg/Kg
- Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) – 50 mg/Kg
- Total Petroleum Hydrocarbons (TPH) – 5,000 mg/Kg

The New Mexico Administrative Code (NMAC) does not currently specify a remediation level for chloride concentrations in soil. Chloride remediation levels are set by the NMOCD on a site-specific basis.

### **3.0 SUMMARY OF SOIL REMEDIATION ACTIVITIES**

On April 9, 2014, upon receiving BLM approval, BOPCO contractors washed the affected vegetation in the immediate area around the flare line with a soap and Micro-Blaze<sup>®</sup> solution. The site was assessed again on April 23, 2014, by BOPCO personnel. During the assessment there was no residue visible on the soil surface, only light to no residue visible on the vegetation and no dead vegetation observed.

On May 15, 2014, Basin conducted an environmental investigation at the release site in an effort to determine if soils had been affected above NMOCD regulatory standards. During the environmental investigation, a series of soil samples (SP#1 through SP#12) were collected from misted area and field-screened for concentrations of chloride using a field test kit. Field-test results suggested concentrations of chloride were less than the method detection limit (MDL) of 120 ppm in each of the collected soil samples. Four (4) confirmation soil samples (SP #6 @ Surface, SP #10 @ Surface, SP #11 @ Surface and SP #12 @ Surface) were submitted to Cardinal Laboratories of Hobbs, New Mexico, for analysis of TPH concentrations. Laboratory analytical indicated concentrations of TPH were less than the laboratory method detection limit (MDL) in each of the submitted soil samples. In addition, soil sample SP #10 @ Surface was also analyzed for concentrations of BTEX and chloride, which were determined to be less than the appropriate laboratory MDL. A summary of “Concentrations of Benzene, BTEX, TPH & Chloride in Soil” is provided in Table 1. A “Site & Sample Location Map” is provided as Figure 2. Laboratory analytical reports are provided as Appendix C.

### **4.0 QA/QC PROCEDURES**

#### **4.1 Soil Sampling**

Soil samples were delivered to Cardinal Laboratories, Inc., in Hobbs, New Mexico, for BTEX, TPH and/or chloride analyses using the methods described below:

- BTEX concentrations in accordance with EPA Method SW-846 8021b
- TPH concentrations in accordance with EPA Method SW-846 8015M
- Chloride concentrations in accordance with EPA Method 4500 Cl-B

## **4.2 Decontamination of Equipment**

Cleaning of the sampling equipment was the responsibility of the environmental technician. Prior to use, and between each sample, the sampling equipment was cleaned with Liqui-Nox® detergent and rinsed with distilled water.

## **4.3 Laboratory Protocol**

The laboratory was responsible for proper QA/QC procedures after signing the chain-of-custody form(s). These procedures were either transmitted with the laboratory reports or are on file at the laboratory.

## **5.0 SITE CLOSURE REQUEST**

Confirmation soil samples collected from the misted area at the PLU #411 Flare Release indicated soil had not been affected above NMOCD regulatory standards. No residue was visible on soils or vegetation within the misted area, suggesting the application of soap and Micro-Blaze® had been effective in mitigating any impacts. Based on these laboratory analytical results and field observations, Basin recommends BOPCO provide the NMOCD-Artesia District Office and the BLM a copy of this *Remediation Summary and Site Closure Request* and request the NMOCD grant site closure to the PLU #411 Flare Release site.

## **6.0 LIMITATIONS**

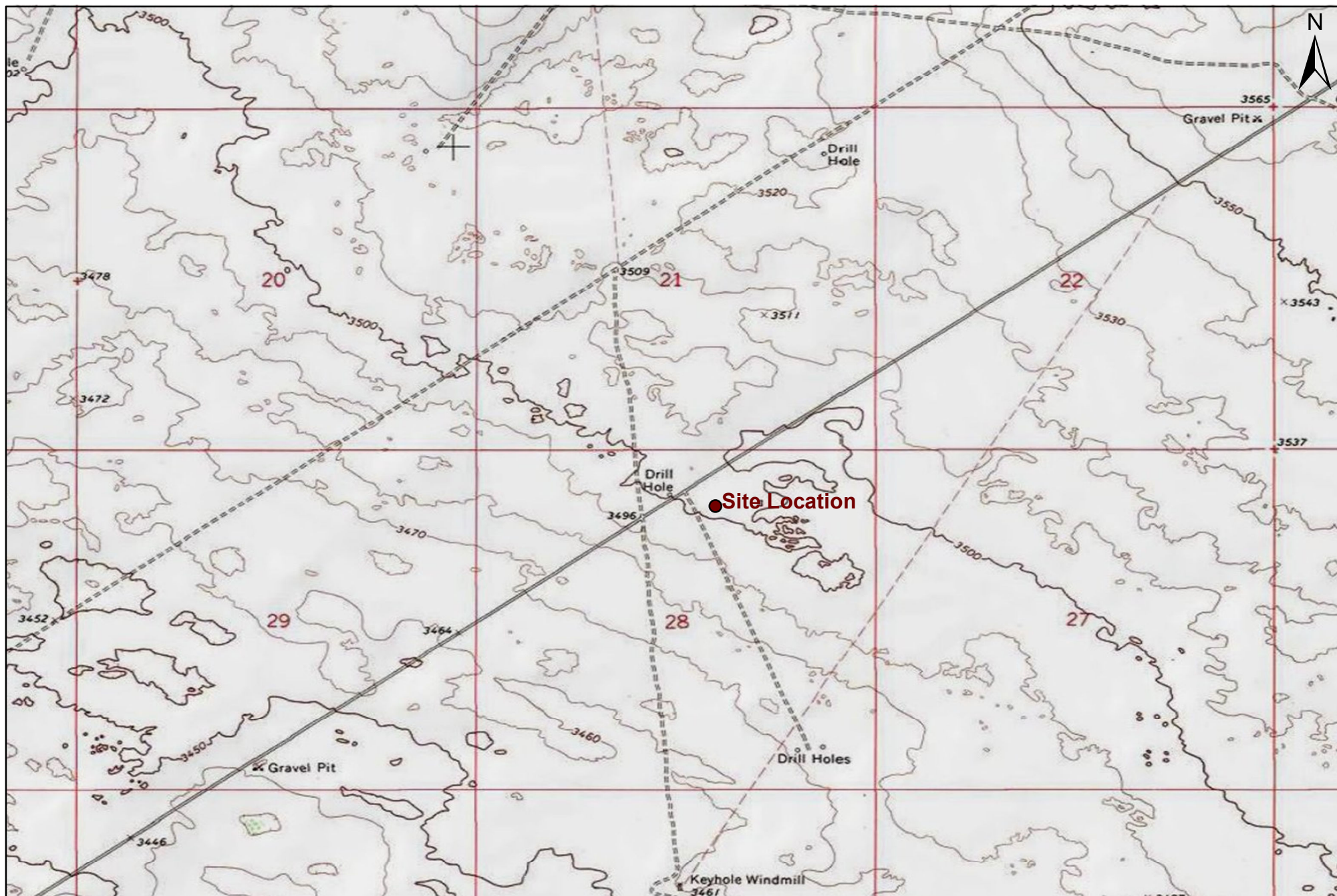
Basin Environmental Service Technologies, LLC, has prepared this *Remediation Summary and Site Closure Request* to the best of its ability. No other warranty, expressed or implied, is made or intended. Basin has examined and relied upon documents referenced in the report and on oral statements made by certain individuals. Basin has not conducted an independent examination of the facts contained in referenced materials and statements. Basin has presumed the genuineness of these documents and statements and that the information provided therein is true and accurate. Basin has prepared this report in a professional manner, using the degree of skill and care exercised by similar environmental consultants. Basin 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 BOPCO, LP. The information contained in this report, including all exhibits and attachments, may not be used by any other party without the express consent of Basin Environmental Service Technologies, LLC, and/or BOPCO, LP.

## **7.0 DISTRIBUTION:**

- Copy 1: Mike Bratcher  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division (District 2)  
1301 E. Grand Avenue  
Artesia, NM 88210
- Copy 2: James Amos  
Bureau of Land Management  
602 E. Greene Street  
Carlsbad, New Mexico 88220
- Copy 3: Tony Savoie  
BOPCO, LP  
522 W. Mermod, Suite 704  
Carlsbad, NM 88220
- Copy 4: Basin Environmental Service Technologies, LLC  
P.O. Box 301  
Lovington, NM 88260

# Figures



1,000 500 0 1,000 2,000  
  
 Distance in Feet

**Figure 1**  
**Site Location Map**  
**BOPCO, LP**  
**Poker Lake Unit #411 Tank Battery Flare Release**  
**Eddy County, New Mexico**  
**NMOCD Reference #: 2RP-2266**



Basin Environmental Service Technologies, LLC  
 3100 Plains Hwy.  
 Lovington, NM 88260

Drawn By: BJA	Checked By: BRB
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May 28, 2014	Scale: 1" = 2000'
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LEGEND:

- Misted Area
- Sample Location
- X Flare

Figure 2  
Site & Sample Location Map  
BOPCO, L.P  
PLU #411 Tank Battery Flare Release  
Eddy County, NM

Basin Environmental Service Technologies

Scale: 1" = 500'

Drawn By: JWL

Edited By: BJA

August 5, 2014

# Tables

**TABLE 1**  
**CONCENTRATIONS OF BENZENE, BTEX, TPH & CHLORIDE IN SOIL**

**BOPCO, LP**  
**POKER LAKE UNIT #411 TANK BATTERY FLARE RELEASE**  
**EDDY COUNTY, NEW MEXICO**  
**NMOCD REFERENCE #: 2RP-2266**

SAMPLE LOCATION	SAMPLE DEPTH (BGS)	SAMPLE DATE	SOIL STATUS	METHOD: EPA SW 846-8021B, 5030					METHOD: 8015M			TOTAL TPH C <sub>6</sub> -C <sub>35</sub> (mg/Kg)	4500 CI-B CHLORIDE (mg/Kg)
				BENZENE (mg/Kg)	TOLUENE (mg/Kg)	ETHYL-BENZENE (mg/Kg)	TOTAL XYLENES (mg/Kg)	TOTAL BTEX (mg/Kg)	GRO C <sub>6</sub> -C <sub>12</sub> (mg/Kg)	DRO C <sub>12</sub> -C <sub>28</sub> (mg/Kg)	ORO C <sub>28</sub> -C <sub>35</sub> (mg/Kg)		
SP #6 @ Surface	Surface	5/15/2014	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	-
SP #10 @ Surface	Surface	5/15/2014	In-Situ	<0.050	<0.050	<0.050	<0.150	<0.300	<10.0	<10.0	<10.0	<10.0	<16.0
SP #11 @ Surface	Surface	5/15/2014	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	-
SP #12 @ Surface	Surface	5/15/2014	In-Situ	-	-	-	-	-	<10.0	<10.0	<10.0	<10.0	-
<b>NMOCD Criteria</b>				<b>10</b>				<b>50</b>				<b>5,000</b>	<b>1,000</b>

- = Not analyzed.

# **Appendices**

**Appendix A**  
**Release Notification &**  
**Corrective Action (Form C-141)**

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

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

Form C-141  
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

**Release Notification and Corrective Action**

n Hamp 1411832156

**OPERATOR**

☒ Initial Report ☐ Final Report

Name of Company: BOPCO, L.P. 260737

Contact: Tony Savoie

Address: 522 W. Mermod, Suite 704 Carlsbad, N.M. 88220

Telephone No. 575-887-7329

Facility Name: PLU-411 Tank Battery

Facility Type: Exploration and Production

Surface Owner: Federal

Mineral Owner: Federal

API No. 30-015-39930

**LOCATION OF RELEASE**

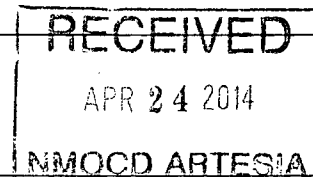
Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
B	28	24S	31E	1000	North	1850	East	Eddy

Latitude N 32.193096 Longitude W 103.780815

**NATURE OF RELEASE**

Type of Release: Crude Oil	Volume of Release: 10 Bbls.	Volume Recovered: None
Source of Release: Facility flare	Date and Hour of Occurrence: 4/8/14 at 6:30 p.m.	Date and Hour of Discovery: 4/8/14 at 6:30 p.m.
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? Was reported to the BLM upon discovery due to acreage involved	
By Whom? Tony Savoie	Date and Hour: 4/9/14 8:00 a.m.	
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.\*

A valve was discovered closed going to the scrubber on the facility flare line. The vessels pressured up sending crude oil out the flare line. The valves were restored to normal operations.

Describe Area Affected and Cleanup Action Taken.\*

The spill impacted and area approximately 1300 ft. X 300 ft. with a fine mist that covered the vegetation and the surface of the soil with less than 1/8" of saturation. The spill also misted just the vegetation in an area approximately 1800 ft. X 400 ft. The vegetation in the immediate area around the flare line was washed down with a soap and micro-blaze mixture on 4/9/14. The site was reviewed again on 4/23/14; there was no residue visible on the soil surface and only light to no residue visible on the vegetation, there was no dead vegetation observed. A series of soil samples will be collected from the surface of the impacted area to determine any further remediation required.

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: Tony Savoie	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Tony Savoie	Approved by Environmental Specialist:	
Title: Waste Management and Remediation Specialist	Approval Date: 4/28/14	Expiration Date: NA
E-mail Address: tasavoie@basspet.com	Conditions of Approval: Remediation per OCD Rule & Guidelines, & like approval by BLM. <b>SUBMIT REMEDIATION</b>	Attached <input type="checkbox"/>
Date: 4/24/14	Phone: 432-556-8730	

\* Attach Additional Sheets If Necessary

PROPOSAL NO LATER THAN:

5/28/14

2RP-2260

# **Appendix B**

## **Photographs**





Photograph of flare and earthen containment at the PLU #411 Tank Battery Flare Release Site.



Photograph of the misted area at the PLU #411 Tank Battery Flare Release Site.





Photograph of the application of soap and Micro-Blaze® to the affected area at the PLU #411 Tank Battery Flare Release Site.



Photograph of the misted area at the PLU #411 Tank Battery Flare Release Site one week after the application of soap and Micro-Blaze®.





Photograph of the affected area and the collection of confirmation soil samples at the PLU #411 Tank Battery Flare Release Site.



Photograph of the collection of confirmation soil samples at the PLU #411 Tank Battery Flare Release Site.

# **Appendix E**

## **Laboratory Analytical Reports**



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

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May 30, 2014

JOEL LOWRY

Basin Environmental Service

P.O. Box 301

Lovington, NM 88260

RE: PLU #411 TANK BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 05/16/14 14:45.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager

**Analytical Results For:**

Basin Environmental Service  
JOEL LOWRY  
P.O. Box 301  
Lovington NM, 88260  
Fax To: (575) 396-1429

Received: 05/16/2014  
Reported: 05/30/2014  
Project Name: PLU #411 TANK BATTERY  
Project Number: NONE GIVEN  
Project Location: EDDY COUNTY, NM

Sampling Date: 05/15/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Celey D. Keene

**Sample ID: SP #6 @ SURFACE (H401512-01)**

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/23/2014	ND	202	101	200	0.794	
DRO >C10-C28	<10.0	10.0	05/23/2014	ND	224	112	200	0.343	
EXT DRO >C28-C35	<10.0	10.0	05/23/2014	ND					

Surrogate: 1-Chlorooctane 118 % 65.2-140

Surrogate: 1-Chlorooctadecane 133 % 63.6-154

**Sample ID: SP #10 @ SURFACE (H401512-02)**

BTX 8021B		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/29/2014	ND	2.07	103	2.00	3.77	
Toluene*	<0.050	0.050	05/29/2014	ND	2.05	102	2.00	3.01	
Ethylbenzene*	<0.050	0.050	05/29/2014	ND	1.96	98.2	2.00	3.78	
Total Xylenes*	<0.150	0.150	05/29/2014	ND	6.15	102	6.00	3.77	
Total BTX	<0.300	0.300	05/29/2014	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 89.4-126

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	05/22/2014	ND	400	100	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

Basin Environmental Service  
JOEL LOWRY  
P.O. Box 301  
Lovington NM, 88260  
Fax To: (575) 396-1429

Received: 05/16/2014  
Reported: 05/30/2014  
Project Name: PLU #411 TANK BATTERY  
Project Number: NONE GIVEN  
Project Location: EDDY COUNTY, NM

Sampling Date: 05/15/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Celey D. Keene

**Sample ID: SP #10 @ SURFACE (H401512-02)**

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/23/2014	ND	202	101	200	0.794	
DRO >C10-C28	<10.0	10.0	05/23/2014	ND	224	112	200	0.343	
EXT DRO >C28-C35	<10.0	10.0	05/23/2014	ND					
Surrogate: 1-Chlorooctane	117 %	65.2-140							
Surrogate: 1-Chlorooctadecane	122 %	63.6-154							

**Sample ID: SP #11 @ SURFACE (H401512-04)**

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/23/2014	ND	202	101	200	0.794	
DRO >C10-C28	<10.0	10.0	05/23/2014	ND	224	112	200	0.343	
EXT DRO >C28-C35	<10.0	10.0	05/23/2014	ND					
Surrogate: 1-Chlorooctane	124 %	65.2-140							
Surrogate: 1-Chlorooctadecane	125 %	63.6-154							

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Analytical Results For:**

Basin Environmental Service  
JOEL LOWRY  
P.O. Box 301  
Lovington NM, 88260  
Fax To: (575) 396-1429

Received: 05/16/2014  
Reported: 05/30/2014  
Project Name: PLU #411 TANK BATTERY  
Project Number: NONE GIVEN  
Project Location: EDDY COUNTY, NM

Sampling Date: 05/15/2014  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Celey D. Keene

**Sample ID: SP #12 @ SURFACE (H401512-06)**

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	<10.0	10.0	05/23/2014	ND	202	101	200	0.794	
DRO >C10-C28	<10.0	10.0	05/23/2014	ND	224	112	200	0.343	
EXT DRO >C28-C35	<10.0	10.0	05/23/2014	ND					
<hr/>									
Surrogate: 1-Chlorooctane	114 %	65.2-140							
Surrogate: 1-Chlorooctadecane	115 %	63.6-154							

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



---

Celey D. Keene, Lab Director/Quality Manager





101 East Marland, Hobbs, NM 88240

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## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]