

1R - 425-28

APPROVALS

YEAR(S):

2012

Hansen, Edward J., EMNRD

From: Hansen, Edward J., EMNRD
Sent: Monday, June 11, 2012 9:39 AM
To: Hack Conder (hconder@riceswd.com)
Cc: Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com); Katie Jones <kjones@riceswd.com> (kjones@riceswd.com)
Subject: Remediation Plan (1R425-28) Termination - ROC Vacuum M-33 Site

**RE: Termination Request
for the Rice Operating Company's
Vacuum M-33 Site
Unit Letter M, Section 33, T17S, R35E, NMPM, Lea County, New Mexico
Remediation Plan (1R425-28) Termination**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received Rice Operating Company's report and request to close the above-referenced site, dated May 18, 2012 (received May 22, 2012). The report is acceptable to the OCD.

The above-referenced report, submitted in accordance with 19.15.29 NMAC (Rule 29; formally, Rule 116), indicates that Rice Operating Company has met the requirements of 19.15.29 NMAC; therefore, the OCD approves the report and hereby notifies you that the remediation plan (1R425-28) is terminated in accordance with 19.15.29 NMAC.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen
Hydrologist
Environmental Bureau

RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

May 18, 2012

Mr. Edward Hansen
New Mexico Energy, Minerals, & Natural Resources
Oil Conservation Division, Environmental Bureau
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

RE: Termination Request
Vacuum M-33 (1R425-28): UL/M, Sec. 33, T17S, R35E
RICE Operating Company – Vacuum SWD System

RECEIVED OCS
2012 MAY 22 A 9 31

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the abandoned Vacuum Saltwater Disposal (SWD) System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

Background

In 2005, ROC initiated work on the former M-33 junction box as part of the system abandonment. The site is located in UL/M, Sec. 33, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 83 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 12x4x17-ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in relatively low chloride concentrations and low concentrations of hydrocarbons. The 17-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of 470 mg/kg, and a total hydrocarbon concentration of below detectable limits. The excavated soil was blended on site then returned to the excavation to ground surface and contoured to the surrounding area. The junction box final report, photo documentation, laboratory analysis, and PID sheet are attached.

Recommendations

Site investigation demonstrates that residual chloride and hydrocarbons in the vadose zone will not with reasonable probability contaminate groundwater in excess of NMOCD standards. This site meets the requirements of the NMOCD-approved Revised Junction

Box Upgrade Work Plan (July 16, 2003). As such, ROC request termination of the regulatory file, or similar closure status.

Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder". The signature is fluid and cursive, with a long horizontal stroke at the end.

Hack Conder
Environmental Manager

enclosures

**RICE OPERATING COMPANY
JUNCTION BOX FINAL REPORT**

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
Vacuum	jct. M-33	M	33	17S	35E	Lea	no box--System abandonment		

LAND TYPE: BLM _____ STATE X FEE LANDOWNER _____ OTHER _____

Depth to Groundwater 83 feet NMOCD SITE ASSESSMENT RANKING SCORE: 10

Date Started 8/17/2005 Date Completed 4/24/2006 NMOCD Witness no

Soil Excavated 30 cubic yards Excavation Length 12 Width 4 Depth 17 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 2/27/2006, 3/30/2006 Sample Depth 17 ft

TPH and chloride laboratory test results completed by using an approved laboratory and testing procedures pursuant to NMOCD guidelines.

CHLORIDE FIELD TESTS

Sample Location	PID ppm	Total Hydrocarbon (C6-C35) mg/kg	Chloride mg/kg
GRAB @ 17 ft BGS	XXX	XXX	470
GRAB @ 17 ft BGS	XXX	<10.0	XXX

LOCATION	DEPTH (ft)	ppm
delineation trench at junction	5	430
	6	110
	7	139
	8	263
	9	481
	10	232
	11	290
	12	480
	13	294
	14	569
	15	454
	16	371
	17	558
backfill	n/a	251

General Description of Remedial Action: This junction box was addressed as part of the Vacuum SWD System abandonment. The box was removed and the jct. site was delineated using a backhoe while chloride field tests and PID measurements were performed on the soil samples collected at regular intervals. Chloride concentrations were relatively low 5-17 ft below the box. VOC concentrations were also very low (0.1-2.1 ppm). A bottom grab sample from the 17-ft-deep trench was collected for laboratory analysis which confirmed the field measurements. The excavated soil was blended on site and then backfilled into the excavation and contoured to the surrounding terrain. The disturbed surface is expected to return to productive capacity at a normal rate.

enclosures: photos, lab results, PID field screenings

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

SITE SUPERVISOR Kevin Collins SIGNATURE not available COMPANY RICE Operating Company

REPORT ASSEMBLED BY Kristin Farris Pope SIGNATURE *Kristin Farris Pope*
DATE 8/24/2006 TITLE Project Scientist

Vacuum jct. M-33



undisturbed junction box

6/29/2005



delineation trench at former box site

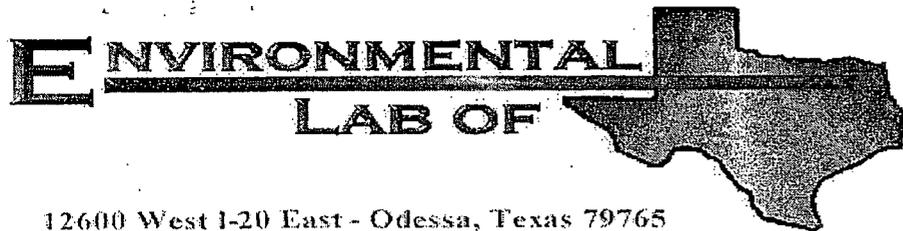


collecting a sample



backfilling trench

1/25/2006



TPH

12600 West 1-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

Roy Rascon
Rice Operating Co.
122 W. Taylor
Hobbs, NM 88240

Project: Vacuum Jct. M-33
Project Number: None Given
Location: None Given

Lab Order Number: 6D04002

Report Date: 04/06/06

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. M-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
04/06/06 17:00

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Vert 17' BGS Grab Sample	6D04002-01	Soil	03/30/06 09:00	04/04/06 08:00

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. M-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
04/06/06 17:00

Organics by GC
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert 17' BGS Grab Sample (6D04002-01) Soil									
Carbon Ranges C6-C12	ND	10.0	mg/kg dry	1	ED60419	04/04/06	04/05/06	EPA 8015M	
Carbon Ranges C12-C28	ND	10.0	"	"	"	"	"	"	
Carbon Ranges C28-C35	ND	10.0	"	"	"	"	"	"	
Total Hydrocarbon C6-C35	ND	10.0	"	"	"	"	"	"	
Surrogate: 1-Chlorooctane		126 %	70-130		"	"	"	"	
Surrogate: 1-Chlorooctadecane		130 %	70-130		"	"	"	"	

Rice Operating Co. 122 W. Taylor Hobbs NM, 88240	Project: Vacuum Jct. M-33 Project Number: None Given Project Manager: Roy Rascon	Fax: (505) 397-1471 Reported: 04/06/06 17:00
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**General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert 17' BGS Grab Sample (6D04002-01) Soil									
% Moisture	10.6	0.1	%	1	ED60417	04/04/06	04/05/06	% calculation	

Rice Operating Co.,
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. M-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
04/06/06 17:00

**Organics by GC - Quality Control
Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch ED60419 - Solvent Extraction (GC)										
Blank (ED60419-BLK1)										
Prepared: 04/04/06 Analyzed: 04/05/06										
Carbon Ranges C6-C12	ND	10.0	mg/kg wet							
Carbon Ranges C12-C28	ND	10.0	"							
Carbon Ranges C28-C35	ND	10.0	"							
Total Hydrocarbon C6-C35	ND	10.0	"							
Surrogate: 1-Chlorooctane	50.9		mg/kg	50.0		102	70-130			
Surrogate: 1-Chlorooctadecane	52.9		"	50.0		106	70-130			
LCS (ED60419-BS1)										
Prepared: 04/04/06 Analyzed: 04/05/06										
Carbon Ranges C6-C12	553	10.0	mg/kg wet	500		111	75-125			
Carbon Ranges C12-C28	591	10.0	"	500		118	75-125			
Total Hydrocarbon C6-C35	1140	10.0	"	1000		114	75-125			
Surrogate: 1-Chlorooctane	56.1		mg/kg	50.0		112	70-130			
Surrogate: 1-Chlorooctadecane	50.6		"	50.0		101	70-130			
Calibration Check (ED60419-CCV1)										
Prepared: 04/04/06 Analyzed: 04/05/06										
Carbon Ranges C6-C12	241		mg/kg	250		96.4	80-120			
Carbon Ranges C12-C28	296		"	250		118	80-120			
Total Hydrocarbon C6-C35	537		"	500		107	80-120			
Surrogate: 1-Chlorooctane	49.7		"	50.0		99.4	70-130			
Surrogate: 1-Chlorooctadecane	46.3		"	50.0		92.6	70-130			
Matrix Spike (ED60419-MS1)										
Source: 6D04007-01 Prepared: 04/04/06 Analyzed: 04/06/06										
Carbon Ranges C6-C12	541	10.0	mg/kg dry	532	ND	102	75-125			
Carbon Ranges C12-C28	538	10.0	"	532	34.9	94.6	75-125			
Total Hydrocarbon C6-C35	1080	10.0	"	1060	34.9	98.6	75-125			
Surrogate: 1-Chlorooctane	54.8		mg/kg	50.0		110	70-130			
Surrogate: 1-Chlorooctadecane	47.9		"	50.0		95.8	70-130			

Rice Operating Co., 122 W. Taylor Hobbs NM, 88240	Project: Vacuum Jct. M-33 Project Number: None Given Project Manager: Roy Rascon	Fax: (505) 397-1471 Reported: 04/06/06 17:00
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Organics by GC - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch ED60419 - Solvent Extraction (GC)

Matrix Spike Dup (ED60419-MSD1)	Source: 6D04007-01			Prepared: 04/04/06		Analyzed: 04/06/06				
Carbon Ranges C6-C12	498	10.0	mg/kg dry	532	ND	93.6	75-125	8.28	20	
Carbon Ranges C12-C28	509	10.0	"	532	34.9	89.1	75-125	5.54	20	
Total Hydrocarbon C6-C35	1010	10.0	"	1060	34.9	92.0	75-125	6.70	20	
<i>Surrogate: 1-Chlorooctane</i>	<i>48.6</i>		<i>mg/kg</i>	<i>50.0</i>		<i>97.2</i>	<i>70-130</i>			
<i>Surrogate: 1-Chlorooctadecane</i>	<i>42.7</i>		<i>"</i>	<i>50.0</i>		<i>85.4</i>	<i>70-130</i>			

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. M-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
04/06/06 17:00

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch ED60417 - General Preparation (Prep)										
Blank (ED60417-BLK1)					Prepared: 04/04/06 Analyzed: 04/05/06					
% Solids	100		%							
Duplicate (ED60417-DUP1)					Source: 6D04001-01 Prepared: 04/04/06 Analyzed: 04/05/06					
% Solids	97.6		%		97.8			0.205	20	
Duplicate (ED60417-DUP2)					Source: 6D04007-01 Prepared: 04/04/06 Analyzed: 04/05/06					
% Solids	93.9		%		93.9			0.00	20	
Duplicate (ED60417-DUP3)					Source: 6D04008-05 Prepared: 04/04/06 Analyzed: 04/05/06					
% Solids	92.2		%		91.4			0.871	20	
Duplicate (ED60417-DUP4)					Source: 6D04009-05 Prepared: 04/04/06 Analyzed: 04/05/06					
% Solids	93.8		%		94.1			0.319	20	
Duplicate (ED60417-DUP5)					Source: 6D04012-01 Prepared: 04/04/06 Analyzed: 04/05/06					
% Solids	87.9		%		86.4			1.72	20	

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: Vacuum Jct. M-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
04/06/06 17:00

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

Report Approved By:

Raland K. Tuttle

Date:

4-07-06

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

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If you have received this material in error, please notify us immediately at 432-563-1800.

Environmental Lab of Texas Variance / Corrective Action Report – Sample Log-In

Client: RCC Of.
 Date/Time: 4/4/00 8:00
 Order #: 6064002
 Initials: CR

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	IO C
Shipping container/cooler in good condition?	<input checked="" type="checkbox"/>	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	<input checked="" type="checkbox"/>	No	
Sample Instructions complete on Chain of Custody?	<input checked="" type="checkbox"/>	No	
Chain of Custody signed when relinquished and received?	<input checked="" type="checkbox"/>	No	
Chain of custody agrees with sample label(s)	<input checked="" type="checkbox"/>	No	
Container labels legible and intact?	<input checked="" type="checkbox"/>	No	
Sample Matrix and properties same as on chain of custody?	<input checked="" type="checkbox"/>	No	
Samples in proper container/bottle?	<input checked="" type="checkbox"/>	No	
Samples properly preserved?	<input checked="" type="checkbox"/>	No	
Sample bottles intact?	<input checked="" type="checkbox"/>	No	
Preservations documented on Chain of Custody?	<input checked="" type="checkbox"/>	No	
Containers documented on Chain of Custody?	<input checked="" type="checkbox"/>	No	
Sufficient sample amount for indicated test?	<input checked="" type="checkbox"/>	No	
All samples received within sufficient hold time?	<input checked="" type="checkbox"/>	No	
VOC samples have zero headspace?	<input checked="" type="checkbox"/>	No	Not Applicable

Other observations:

Variance Documentation:

Contact Person: - _____ Date/Time: _____ Contacted by: _____
 Regarding: _____

Corrective Action Taken:

110000, NEW MEXICO 80270
 PHONE: (505) 393-9174 FAX: (505) 397-1471
VOC FIELD TEST REPORT FORM
 MINI RAE PLUS CLASSIC PHOTOIONIZATION GAS DETECTOR

MODEL NO: PGM 761S
 CALIBRATION GAS
 GAS COMPOSITION: ISOBUTYLENE
 AIR
 LOT NO: 05 2859
 EXP. DATE: 1 19 07
 METER READING
 ACCURACY: 100.5%

SERIAL NO: 104412
 100 PPM
 BALANCE
 FILL DATE: 7 19 05
 ACCURACY: ±2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
VAC	M-33	M	33	175	35E

COPY

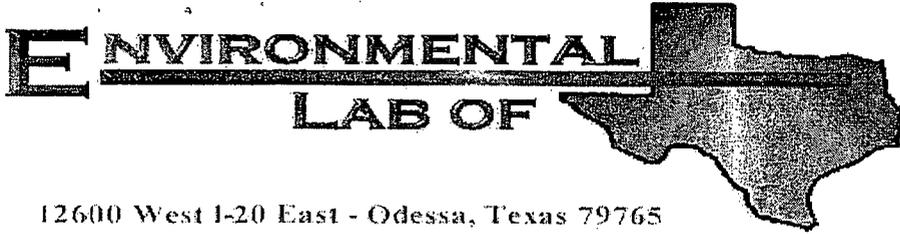
Vertical at Source

SAMPLE	PID RESULT	SAMPLE	PID RESULT
5	0.4	Back Hill Camp	1.2
6	1.2		
7	0.4		
8	1.1		
9	0.4		
10	0.5		
11	2.1		
12	0.7		
13	0.1		
14	0.3		
15	0.1		
16	0.6		
17	0.5		

I certify that I have calibrated the above instrument in accordance to the manufacture operation manual.

Ken D. Ball
 Signature

01/25/06
 Date



Chloride

12600 West 1-20 East - Odessa, Texas 79765

COPY

Analytical Report

Prepared for:

Roy Rascon
Rice Operating Co.
122 W. Taylor
Hobbs, NM 88240

Project: VAC Jct. M-33
Project Number: None Given
Location: None Given

Lab Order Number: 6C02003

Report Date: 03/08/06

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: VAC Jct. M-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
03/08/06 08:41

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Vert.@ Source@ 17'	6C02003-01	Soil	02/27/06 12:45	03/02/06 07:25

Rice Operating Co. 122 W. Taylor Hobbs NM, 88240	Project: VAC Jct. M-33 Project Number: None Given Project Manager: Roy Rascon	Fax: (505) 397-1471 Reported: 03/08/06 08:41
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**General Chemistry Parameters by EPA / Standard Methods
Environmental Lab of Texas**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Vert.@ Source@ 17' (6C02003-01) Soil									
Chloride	470	10.0	mg/kg	20	EC60801	03/07/06	03/08/06	EPA 300.0	

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: VAC Jct. M-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
03/08/06 08:41

General Chemistry Parameters by EPA / Standard Methods - Quality Control
Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC60801 - Water Extraction										
Blank (EC60801-BLK1) Prepared: 03/07/06 Analyzed: 03/08/06										
Chloride	ND	0.500	mg/kg							
LCS (EC60801-BS1) Prepared: 03/07/06 Analyzed: 03/08/06										
Chloride	8.66		mg/L	10.0		86.6	80-120			
Calibration Check (EC60801-CCV1) Prepared: 03/07/06 Analyzed: 03/08/06										
Chloride	9.34		mg/L	10.0		93.4	80-120			
Duplicate (EC60801-DUP1) Source: 6C02003-01 Prepared: 03/07/06 Analyzed: 03/08/06										
Chloride	473	10.0	mg/kg		470			0.636	20	

Rice Operating Co.
122 W. Taylor
Hobbs NM, 88240

Project: VAC Jct. M-33
Project Number: None Given
Project Manager: Roy Rascon

Fax: (505) 397-1471

Reported:
03/08/06 08:41

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
LCS Laboratory Control Spike
MS Matrix Spike
Dup Duplicate

Report Approved By:

Raland K Tuttle

Date: 3-08-06

Raland K. Tuttle, Lab Manager
Celey D. Keene, Lab Director, Org. Tech Director
Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director
LaTasha Cornish, Chemist
Sandra Sanchez, Lab Tech.

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If you have received this material in error, please notify us immediately at 432-563-1800.

Environmental Lab of Texas
Variance / Corrective Action Report – Sample Log-In

Client: PCC of
 Date/Time: 3/2/06 7:25
 Order #: 602003
 Initials: ck

Sample Receipt Checklist

Temperature of container/cooler?	Yes	No	20.0 C
Shipping container/cooler in good condition?	Yes	No	
Custody Seals intact on shipping container/cooler?	Yes	No	Not present
Custody Seals intact on sample bottles?	Yes	No	Not present
Chain of custody present?	Yes	No	
Sample Instructions complete on Chain of Custody?	Yes	No	
Chain of Custody signed when relinquished and received?	Yes	No	
Chain of custody agrees with sample label(s)	Yes	No	
Container labels legible and intact?	Yes	No	
Sample Matrix and properties same as on chain of custody?	Yes	No	
Samples in proper container/bottle?	Yes	No	
Samples properly preserved?	Yes	No	
Sample bottles intact?	Yes	No	
Preservations documented on Chain of Custody?	Yes	No	
Containers documented on Chain of Custody?	Yes	No	
Sufficient sample amount for indicated test?	Yes	No	
All samples received within sufficient hold time?	Yes	No	
VOC samples have zero headspace?	Yes	No	Not Applicable

Other observations:

Variance Documentation:

Contact Person: - _____ Date/Time: _____ Contacted by: _____
 Regarding: _____

Corrective Action Taken:

Hansen, Edward J., EMNRD

From: Laura Pena <lpena@riceswd.com>
Sent: Friday, June 08, 2012 2:38 PM
To: Hansen, Edward J., EMNRD
Cc: Hack Conder
Subject: Vacuum Jct. M-33 (1R425-28) Photo Documentation
Attachments: Vacuum Jct. M-33 (1R425-28) Photo Documentation.pdf

Mr. Hansen,

Attached is the photo documentation for the Vacuum Jct. M-33 (1R425-28) site as requested.

Let Hack Conder or me know if you have any questions or require any additional information.

Thank you,

Laura Peña
Environmental Project Scientist
RICE Operating Company

Vacuum Jct. M-33 (1R425-28)
Unit M, Section 33, T17S, R35E



Facing northeast

1/27/2006



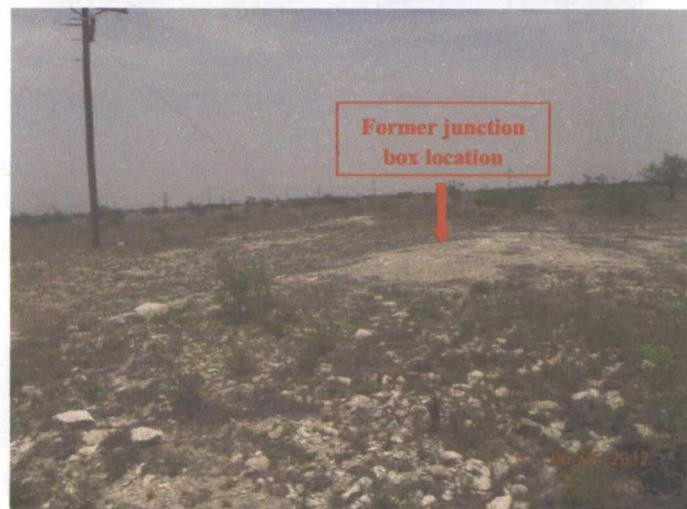
Facing north

8/6/2006



Facing northeast

6/6/2012



Facing north

6/6/2012