1R-423-0

# GENERAL CORRESPONDENCE

YEAR(S): 2005

# RICE Operating Company

122 West Taylor • Hobbs, New Mexico 88240 Phone: (505)393-9174 • Fax: (505) 397-1471

## **CERTIFIED MAIL RETURN RECEIPT NO. 7002 2410 0000 4940 1664**

January 14, 2005

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

RE: NOTIFICATION OF GROUNDWATER IMPACT JUSTIS JCT. L-1 UNIT 'L', SEC. 1, T25S, R37E

Mr. Anderson:

Rice Operating Company (ROC) takes this opportunity to notify the Director of the NMOCD, Environmental Bureau of groundwater impact in accordance with NM Rule 116. The remediation of this site may fall under NM Rule 19 procedures.

The following work at this junction box site was performed in accordance with the NMOCD-approved Investigation Work Plan submitted by Highlander Environmental Corp. (Highlander) of Midland, Texas. A delineation soil bore was initiated on 12/9/2004 where groundwater was encountered at 75 feet and a 2-inch monitoring well was installed to a depth of 90 feet as chloride impact was indicated by field tests. The well was sampled pursuant to NMOCD guidelines by Highlander on 12/21/2004. Environmental Lab of Texas performed the analysis that confirmed WQCC limits were exceeded. Highlander will continue to sample the well quarterly in 2005.

ROC is the service provider (operator) for the Justis Salt Water Disposal System and has no ownership of any portion of the pipelines, wells, or facilities. The Justis System is owned by a consortium of oil producers, System Partners, who provide all operating capital on a percentage ownership/usage basis. Environmental remediation projects of this magnitude require System Partner AFE approval and work begins as funds are received.

Highlander will conduct further site characterization in order to develop a Corrective Action Plan (CAP) for this site. Please accept this notification for the above-referenced

site. Should you have any questions or concerns regarding this site, please do not hesitate to contact me.

RICE OPERATING COMPANY

Kniotin Sains Pope

Kristin Farris Pope

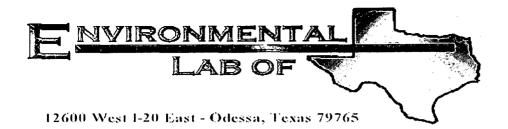
Project Scientist

cc: LBG, CDH, Highlander, file

Mr. Chris Williams NMOCD, District 1 Office 1625 N. French Drive Hobbs, NM 88240

enclosures: water analysis, well log, map

	Logger:		lke Tavarez; Mort Bates	Client:	Well ID:			
Deillin	Driller: g Method:		tkins Engineering Associates, Inc. 4.25 in. Hollow Stem Auger	RICE Operating Company Project Name:	-			
	Start Date:		12/9/2004	L-1 vent				
Notes:	End Date:		12/10/2004	Location: JUSTIS SWD System	MW-1			
		at TD = 90	former junction box site  of t Groundwater = 75 ft	unit 'L', Sec. 1, T25S, R37E Lea County, NM	]			
	4.			Lea County, NN				
Depth (feet)	chloride lab tests	OVM	Description	Lithology 4-in. x 4-in. x ft well cover	Well Construction			
0					2 x 2 ft concrete pad on			
2	ļ		0 - 6 ft		surface			
3			SILTY SAND W/CALICHE					
5	-	0.0	loose, tan, dry					
6 7				_				
8								
9 10		0.0	6 - 13 ft SILTY SAND w/CALICHE					
11		0.0	loose, light tan, damp					
12 13								
14								
15 16	4890	0.0						
17								
18 19			13 - 24 ft CLÁYEY SAND W/CALICHE					
20	3100	0.0	loose, tan to white, damp					
21 22								
23	ļ							
24 25	5440	0.0						
26			24 - 30 ft					
27 28			CLAYEY SAND					
29			loose, reddish tan, damp		\			
30 31	2340	0.0		2-in. sch. 40 PVC casing	grout			
32			30 - 36 ft		1/			
33 34		$\vdash$	CLAYEY SAND w/BROKEN SANDSTONE					
35	2040	0.0	firm, tan, dry	40				
36 37								
38 39				in. t				
40	2980	1.0	36 - 45 ft					
41 42		-	CLAYEY SAND loose, tan, dry					
43			ioood, tali, aly					
44 45	3400	1.0						
46								
47 48		-	45 - 52 ft					
49 50	2420	0.0	POORLY GRADED SAND loose, tan, dry					
51	2420	0.0	ioose, tan, ury					
52 53			52 - 55 ft					
54			SILTY SAND					
55 56	2170	1.0	loose, tan, dry	-				
57			55 - 59 ft SILTY SAND					
58 59	<u> </u>		loose, reddish tan, damp		1/			
60 61	3250	1.0			K			
62					<b>3</b>			
63 64					bentonite			
65	4130	0.0	59 - 74 ft		seal			
66 67			SILTY SAND w/BROKEN SANDSTONE		3			
68			firm, tan and white, damp		<b>4</b> <			
69 70	1870	1.0			1)			
71 72		<del></del>						
73								
74 75		1.0			1			
76					1			
77 78					1 (			
79					sand			
80 81		$\sqcup$	74 007		pack			
82	TPH lab		74 - 90 ft SILTY FLOWING SAND		:]			
83 84	were perfo		soft, reddish brown, wet		1			
85	70 ft sam	ples;						
86 87	all yielded detect le	non-			1			
88 89	(<10 pp							
90					1) -			



### **Analytical Report**

#### **Prepared for:**

Ike Tavarez
Highlander Environmental Corp.
1910 N. Big Spring St.
Midland, TX 79705

Project: Rice / Justice L-1
Project Number: 2142
Location: Lea County, NM

Lab Order Number: 4L22019

Report Date: 01/03/05

Project: Rice / Justice L-1

Fax: (432) 682-3946

1910 N. Big Spring St. Midland TX, 79705 Project Number: 2142 Project Manager: Ike Tavarez **Reported:** 01/03/05 17:51

#### ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
MW-I	4L22019-01	Water	12/21/04 10:00	12/22/04 15:13

Project: Rice / Justice L-1

Fax: (432) 682-3946

1910 N. Big Spring St. Midland TX, 79705 Project Number: 2142 Project Manager: Ike Tavarez Reported: 01/03/05 17:51

#### Organics by GC Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
MW-1 (4L22019-01) Water									
Benzene	0.0158	0.00100	mg/L	1	EL43007	12/29/04	12/30/04	EPA 8021B	
Toluene	ND	0.00100	"	"	**		**	"	
Ethylbenzene	0.00209	0.00100	11	n	ŧ	*	"	и	
Xylene (p/m)	ND	0.00100	11	11	**	II .	**	"	
Xylene (o)	ND	0.00100	m	11	**	"	n	"	
Surrogate: a,a,a-Trifluorotoluene		97.2 %	80-12	0	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		95.1 %	80-12	0	"	"	"	"	

1910 N. Big Spring St. Midland TX, 79705 Project: Rice / Justice L-1

Project Number: 2142 Project Manager: Ike Tavarez Fax: (432) 682-3946

**Reported:** 01/03/05 17:51

#### General Chemistry Parameters by EPA / Standard Methods Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
MW-1 (4L22019-01) Water									
Total Alkalinity	206	2.00	mg/L	1	EL42907	12/29/04	12/29/04	EPA 310.2M	
Chloride	1060	5.00	11	**	EL42912	12/29/04	12/29/04	EPA 325.3M	
Total Dissolved Solids	2620	5.00	mg/kg	"	EL42801	12/27/04	12/28/04	EPA 160.1	
Sulfate	550	5.00	mg/L	10	EL42909	12/29/04	12/29/04	EPA 375.4	

1910 N. Big Spring St. Midland TX, 79705 Project: Rice / Justice L-1

Project Number: 2142 Project Manager: Ike Tavarez Fax: (432) 682-3946

Reported: 01/03/05 17:51

### Total Metals by EPA / Standard Methods Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
MW-1 (4L22019-01) Water									
Calcium	381	1.00	mg/L	100	EA50301	12/29/04	12/30/04	EPA 6010B	
Magnesium	143	0.100	"	**	11	"	"	**	
Potassium	14.4	0.500	,,	10	"	u	11	"	
Sodium	477	1.00	11	100	**	**	n	**	

Highlander Environmental Corp. 1910 N. Big Spring St. Midland TX, 79705 Project: Rice / Justice L-1

Project Number: 2142
Project Manager: Ike Tavarez

Fax: (432) 682-3946

Reported: 01/03/05 17:51

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

		Reporting		Spike	Source	a/DDC	%REC	220	RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch EL43007 - EPA 5030C (GC)										
Blank (EL43007-BLK1)				Prepared:	12/29/04 Ai	nalyzed: 12	2/30/04			
Benzene	ND	0.00100	mg/L							
Toluene	ND	0.00100	"							
Ethylbenzene	ND	0.00100	**							
Xylene (p/m)	ND	0.00100	"	,						
Xylene (o)	ND	0.00100	"							
Surrogate: a,a,a-Trifluorotoluene	90.9		ug/l	100		90.9	80-120			
Surrogate: 4-Bromofluorobenzene	80.2		n	100		80.2	80-120			
LCS (EL43007-BS1)				Prepared:	12/29/04 Ai	nalyzed: 12	2/30/04			
Benzene	87.9		ug/l	100		87.9	80-120			
Toluene	88.5		**	100		88.5	80-120			
Ethylbenzene	97.5		**	100		97.5	80-120			
Xylene (p/m)	219		n	200		110	80-120			
Xylene (o)	111		"	100		111	80-120			
Surrogate: a,a,a-Trifluorotoluene	109		· ·	100		109	80-120			
Surrogate: 4-Bromofluorobenzene	119		n	100		119	80-120			
Calibration Check (EL43007-CCV1)				Prepared:	12/29/04 Aı	nalyzed: 12	2/30/04			
Benzene	87.8		ug/l	100		87.8	80-120			
Toluene	89.0		**	100		89.0	80-120			
Ethylbenzene	95.3		**	100		95.3	80-120			
Xylene (p/m)	213		**	200		106	80-120			
Xylene (o)	104		**	100		104	80-120			
Surrogate: a,a,a-Trifluorotoluene	113		"	100		113	80-120			
Surrogate: 4-Bromofluorobenzene	116		ıı	100		116	80-120			
Matrix Spike (EL43007-MS1)	Sou	rce: 4L22009-	05	Prepared:	12/29/04 Aı					
Benzene	88.6		ug/l	100	ND	88.6	80-120			
Toluene	85.4		"	100	ND	85.4	80-120			
Ethylbenzene	87.9		"	100	ND	87.9	80-120			
Xylene (p/m)	186		"	200	ND	93.0	80-120			
Xylene (o)	94.2		11	100	ND	94.2	80-120			
Surrogate: a,a,a-Trifluorotoluene	107		"	100		107	80-120			
Surrogate: 4-Bromofluorobenzene	119		"	100		119	80-120			

Project: Rice / Justice L-1

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1910 N. Big Spring St. Midland TX, 79705 Project Number: 2142 Project Manager: Ike Tavarez Reported: 01/03/05 17:51

#### 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 EL43007 - EPA 5030C (GC)										
Matrix Spike Dun (FL 43007-MSD1)	Sou	rce: 41.22009-	05	Prepared: 1	12/29/04 A	nalyzed: 12	/30/04			

Matrix Spike Dup (EL43007-MSD1)	Source: 4	L22009-05	Prepared: 1	12/29/04 A	nalyzed: 13	2/30/04		
Benzene	92.9	ug/l	100	ND	92.9	80-120	4.74	20
Toluene	86.0	11	100	ND	86.0	80-120	0.700	20
Ethylbenzene	87.2	"	100	ND	87.2	80-120	0.800	20
Xylene (p/m)	164	tt.	200	ND	82.0	80-120	12.6	20
Xylene (o)	86.7	**	100	ND	86.7	80-120	8.29	20
Surrogate: a,a,a-Trifluorotoluene	112	"	100		112	80-120		
Surrogate: 4-Bromofluorobenzene	117	"	100		117	80-120		

Project: Rice / Justice L-1

1910 N. Big Spring St. Midland TX, 79705

Project Number: 2142 Project Manager: Ike Tavarez Fax: (432) 682-3946

**Reported:** 01/03/05 17:51

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

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch EL42801 - 413.1										
Blank (EL42801-BLK1)				Prepared:	12/27/04 A	nalyzed: 12	2/28/04			
Total Dissolved Solids	ND	5.00	mg/kg		·					
Duplicate (EL42801-DUP1)	Sour	rce: 4L22019-	-01	Prepared:	12/27/04 A	nalyzed: 12	2/28/04			
Total Dissolved Solids	2480	5.00	mg/kg		2620			5.49	20	
Batch EL42907 - General Preparation (	WetChem)									
Blank (EL42907-BLK1)				Prepared &	2 Analyzed	12/29/04				
Total Alkalinity	ND	2.00	mg/L							
Duplicate (EL42907-DUP1)	Sour	ce: 4L22002-	-01	Prepared &	2 Analyzed	12/29/04				
Total Alkalinity	181	2.00	mg/L	Prepared & Analyzed: 12/29/04 182				0.551	20	
Reference (EL42907-SRM1)				Prepared &	ż Analyzed	12/29/04				
Carbonate Alkalinity	0.0501		mg/L	0.0500		100	80-120			
Batch EL42909 - General Preparation (	WetChem)									
Blank (EL42909-BLK1)				Prepared &	k Analyzed:	12/29/04				
Sulfate	ND	0.500	mg/L				-			
Calibration Check (EL42909-CCV1)				Prepared &	k Analyzed:	12/29/04				
Sulfate	48.9		mg/L	50.0		97.8	80-120			
Duplicate (EL42909-DUP1)	Soui	ce: 4L21010-	01	Prepared &	z Analyzed:					
Sulfate	96.6	1.00	mg/L		99.8			3.26	20	

Project: Rice / Justice L-1

Fax: (432) 682-3946

1910 N. Big Spring St. Midland TX, 79705 Project Number: 2142 Project Manager: Ike Tavarez Reported: 01/03/05 17:51

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

		Reporting		Spike	Source		%REC		RPD	
Analyte	Result	Limit	Units	Level	Result	%REC	Limits	RPD	Limit	Notes
Batch EL42912 - General Preparation (V	VetChem)									
Blank (EL42912-BLK1)				Prepared &	Analyzed:	12/29/04				
Chloride	ND	5.00	mg/L							
Matrix Spike (EL42912-MS1)	Sour	ce: 4L22019-	01	Prepared &	Analyzed:	12/29/04				
Chloride	3320	5.00	mg/L	2500	1060	90.4	80-120			
Matrix Spike Dup (EL42912-MSD1)	Sour	ce: 4L22019-	01	Prepared &	Analyzed:	12/29/04				
Chloride	3370	5.00	mg/L	2500	1060	92.4	80-120	1.49	20	
Reference (EL42912-SRM1)				Prepared &	: Analyzed:	12/29/04				
Chloride	4960		mg/L	5000		99.2	80-120			

1910 N. Big Spring St. Midland TX, 79705 Project: Rice / Justice L-1

Project Number: 2142 Project Manager: Ike Tavarez Fax: (432) 682-3946

**Reported:** 01/03/05 17:51

### Total Metals 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 EA50301 - 6010B/No Digestion										
Blank (EA50301-BLK1)				Prepared: 1	12/29/04 A	nalyzed: 12	2/30/04			
Calcium	ND	0.0100	mg/L							
Magnesium	ND	0.00100	**							
Potassium	ND	0.0500	**							
Sodium	ND	0.0100	**							
Calibration Check (EA50301-CCV1)				Prepared: 1	12/29/04 A	nalyzed: 12	2/30/04			
Calcium	1.98		mg/L	2.00		99.0	85-115		1.0	
Magnesium	2.28		11	2.00		114	85-115			
Potassium	2.05		"	2.00		102	85-115			
Sodium	1.86		**	2.00		93.0	85-115			
Duplicate (EA50301-DUP1)	Sou	rce: 4L22019-	01	Prepared: 1	12/29/04 A	nalyzed: 12	2/30/04			
Calcium	496	1.00	mg/L		381			26.2	20	QR-02
Magnesium	168	0.100	"		143			16.1	20	
Potassium	17.1	0.500	"		14.4			17.1	20	
Sodium	555	1.00	"		477			15.1	20	

Project: Rice / Justice L-1

1910 N. Big Spring St. Midland TX, 79705

Project Number: 2142 Project Manager: Ike Tavarez Fax: (432) 682-3946

**Reported:** 01/03/05 17:51

### Total Metals 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 EA50301 - 6010B/No Digestion										41004.01.00
Blank (EA50301-BLK1)				Prepared: 1	2/29/04 A	nalyzed: 12	2/30/04			
Calcium	ND	0.0100	mg/L							
Magnesium	ND	0.00100	"							
Potassium	ND	0.0500	"							
Sodium	ND	0.0100	"							
Calibration Check (EA50301-CCV1)				Prepared: 1	2/29/04 A	nalyzed: 12	2/30/04			
Calcium	1.98		mg/L	2.00		99.0	85-115			
Magnesium	2.28		"	2.00		114	85-115			
Potassium	2.05		"	2.00		102	85-115			•
Sodium	1.86		**	2.00		93.0	85-115			
Duplicate (EA50301-DUP1)	Sou	rce: 4L22019-	01	Prepared: 1	2/29/04 A	nalyzed: 12	2/30/04			
Calcium	496	1,00	mg/L		381			26.2	20	QR-02
Magnesium	168	0.100	"		143			16.1	20	
Potassium	17.1	0.500	"		14.4			17.1	20	
Sodium	555	1.00	11		477			15.1	20	

Project: Rice / Justice L-1

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1910 N. Big Spring St. Midland TX, 79705 Project Number: 2142 Project Manager: Ike Tavarez

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#### **Notes and Definitions**

QR-02 The RPD result exceeded the QC control limits; however, both percent recoveries were acceptable. Sample results for the QC batch were accepted based on percent recoveries and completeness of QC data.

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

	Kaland Kethal	
Report Approved By:	Radanchio	Date

Raland K. Tuttle, Lab Manager Celey D. Keene, Lab Director, Org. Tech Director

Peggy Allen, QA Officer

Jeanne Mc Murrey, Inorg. Tech Director James L. Hawkins, Chemist/Geologist Sandra Sanchez, Lab Tech.

This material is intended only for the use of the individual (s) or entity to whom it is addressed, and may contain information that is privileged and confidential.

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

1/3/2005

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