

**OXY USA, Inc.
Righthand Canyon 34 Fed Battery
Closure Report**

**Section 34, T21S, R24E
Eddy County, New Mexico**

**2RP-2790
April 1, 2015**



Prepared for:

**OXY USA, Inc.
1017 W Stanolind Road
Hobbs, New Mexico 88240**

By:

**Safety & Environmental Solutions, Inc.
703 East Clinton Street
Hobbs, New Mexico 88240
(575) 397-0510**

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I. Company Contacts

Representative	Company	Telephone	E-mail
Chris Jones	OXY USA, INC.	575-499-3337	Christopher.Jones@oxy.com
Bob Allen	SESI	575-397-0510	ballen@sesi-nm.com

II. Background

Safety and Environmental Solutions, Inc. (SESI) was engaged by OXY USA, INC to perform site assessment of a release area at the Righthand Canyon 34 Fed Battery located in Section 34 of Township 21 South, Range 24 East, Eddy County, New Mexico.

According to the C-141: on January 10, 2015: a 4 inch Victrollic on a water line became detached creating an impacted area of approximately 384 sq. ft. inside battery area.

III. Surface and Ground Water

The nearest groundwater of record is approximately 1.0 mile Northeast of the site. The New Mexico Office of State Engineer record is in Section 26 Range 24 East and Township 21 South. The reported depth was 150 feet below ground surface (BGS).

IV. Characterization

The target cleanup levels are determined using the *Guidelines for Remediation of Leaks, Spills and Releases* published by the NMOC (August 13, 1993). Based on the ranking criteria presented below, the applicable Recommended Remediation Action Levels (RRAL) are 10 parts per million (ppm) Benzene, 50 ppm combined benzene, toluene, ethylbenzene, and total xylenes (BTEX), and 5,000 ppm Total Petroleum Hydrocarbons (TPH).

Depth to Ground Water:			
(Vertical distance from contaminants to seasonal high water elevation of groundwater)	Less than 50 feet	20 points	
	50 feet to 99 feet	10 points	
	>100 feet	0 points	X
Wellhead Protection Area:			
(Less than 200 feet from a private domestic water source; or less than 1000 feet from all other water sources)	Yes	20 points	
	No	0 points	X
Distance to Surface Water:			
(Horizontal distance to perennial lakes, ponds, rivers, streams, creeks, irrigation canals and ditches)	Less than 200 feet	20 points	
	200 feet to 1000 feet	10 points	
	>1000 feet	0 points	X
RANKING SCORE (TOTAL POINTS)			0

V. Work Performed

On January 12, 2015, SESI was onsite to perform a preliminary assessment and map the spill location.

On March 24, 2015 SESI personnel revisited the site to determine the vertical, as well as the horizontal extent of impact. Due to the nature of the naturally occurring hard shale in the area it was determined that "hand excavation" would be used combined with field sampling and testing of the soil. The vertical delineation efforts consisted of Two Sample Bottom hole representative soil samples that were retrieved at a depth of 6" bgs. Sample South Wall was taken from the south wall of the excavation area, as well as the North, East, and West walls in order to confirm the horizontal extent. All samples were properly packaged, preserved and transported to a commercial Laboratory, Hobbs New Mexico and analyzed for Benzene, Toluene, Ethylbenzene, Xylenes, Total BTEX, Chloride (Cl) (Method SM4500Cl-B), as well as Total Petroleum Hydrocarbons TPH, consisting of GRO and DRO constituents. The results of the analysis are presented in the table below:

Sample Date 03/05/2015	Sample ID	Total BTEX	Chloride (Cl)	GRO (C ₆ -C ₁₀) (mg/kg)	DRO (>C ₁₀ -C ₂₈) (mg/kg)
Location	Method		Method		
SP-1 Bottom at 6"	BTEX 8021B	<9.89	32.0	118	1900
SP-2 Bottom at 6"	BTEX 8021B	<11.5	32.0	<116	<1790
SP3-South Wall	BTEX 8021B	<0.300	128	<10.0	<150
SP4-West Wall	BTEX 8021B	<.300	224	<10.0	<10.0
SP5-North Wall	BTEX 8021B	<.300	<16.0	<10.0	<10.0
SP6-East Wall	BTEX 8021B	<.300	64.0	<10.0	<10.0

VI. Closure

Due to the number of lines in the area, as well as the presence of hard shale the above laboratory analyses sufficed for acceptable levels of BTEX, TPH and Chloride levels. No further action was deemed prudent and the excavation was backfilled with 3/8" pea gravel, esthetically restoring the battery area. Therefore, Safety and Environmental Solutions, Inc. respectfully requests closure of the regulatory file related to this incident on the aforementioned site.

VII. Figures & Appendices

- Figure 1 – Vicinity Map
- Figure 2 – Site Plan
- Appendix A – Analytical Results
- Appendix B – C-141
- Appendix C – Site Photographs
- Appendix D – Groundwater Study

Figure 1
Vicinity Map



Righthand Canyon 34 Fed Batt.

183 ft

© 2015 Google

Google earth

Figure 2 Site Plan



Righthand Canyon 34 Fed Battery

Appendix A

Analytical Results

March 27, 2015

Bob Allen

Safety & Environmental Solutions

703 East Clinton

Hobbs, NM 88240

RE: NMN RIGHT HAND CANYON #34 FEDERAL

Enclosed are the results of analyses for samples received by the laboratory on 03/25/15 8:00.

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.

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,



Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

 Safety & Environmental Solutions
 Bob Allen
 703 East Clinton
 Hobbs NM, 88240
 Fax To: (575) 393-4388

Received:	03/25/2015	Sampling Date:	03/24/2015
Reported:	03/27/2015	Sampling Type:	Soil
Project Name:	NMN RIGHT HAND CANYON #34 FEDERAL	Sampling Condition:	Cool & Intact
Project Number:	OXY-15-003	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP-1 BOTTOM (H500795-01)

BTEX 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	03/26/2015	ND	2.16	108	2.00	1.54	
Toluene*	0.809	0.050	03/26/2015	ND	1.96	97.8	2.00	1.01	
Ethylbenzene*	0.700	0.050	03/26/2015	ND	1.94	97.2	2.00	1.81	
Total Xylenes*	8.38	0.150	03/26/2015	ND	5.86	97.7	6.00	1.49	
Total BTEX	9.89	0.300	03/26/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 61-154

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	03/26/2015	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	118	10.0	03/27/2015	ND	203	102	200	0.802	
DRO >C10-C28	1900	10.0	03/27/2015	ND	212	106	200	1.15	

Surrogate: 1-Chlorooctane 114 % 47.2-157
Surrogate: 1-Chlorooctadecane 123 % 52.1-176

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* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

 Safety & Environmental Solutions
 Bob Allen
 703 East Clinton
 Hobbs NM, 88240
 Fax To: (575) 393-4388

Received:	03/25/2015	Sampling Date:	03/24/2015
Reported:	03/27/2015	Sampling Type:	Soil
Project Name:	NMN RIGHT HAND CANYON #34 FEDER/	Sampling Condition:	Cool & Intact
Project Number:	OXY-15-003	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP-2 BOTTOM (H500795-02)

BTEX 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	03/26/2015	ND	2.20	110	2.00	3.92	
Toluene*	0.840	0.050	03/26/2015	ND	1.98	98.9	2.00	2.08	
Ethylbenzene*	0.804	0.050	03/26/2015	ND	1.97	98.3	2.00	3.29	
Total Xylenes*	9.81	0.150	03/26/2015	ND	5.92	98.7	6.00	2.84	
Total BTEX	11.5	0.300	03/26/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 117 % 61-154

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	03/26/2015	ND	432	108	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10	116	10.0	03/27/2015	ND	203	102	200	0.802	
DRO >C10-C28	1790	10.0	03/27/2015	ND	212	106	200	1.15	

Surrogate: 1-Chlorooctane 110 % 47.2-157

Surrogate: 1-Chlorooctadecane 122 % 52.1-176

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*=Accredited Analyte

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 Fax To: (575) 393-4388

Received:	03/25/2015	Sampling Date:	03/24/2015
Reported:	03/27/2015	Sampling Type:	Soil
Project Name:	NMN RIGHT HAND CANYON #34 FEDER/	Sampling Condition:	Cool & Intact
Project Number:	OXY-15-003	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP-3 SOUTH WALL (H500795-03)

BTEX 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	03/26/2015	ND	2.20	110	2.00	3.92	
Toluene*	<0.050	0.050	03/26/2015	ND	1.98	98.9	2.00	2.08	
Ethylbenzene*	<0.050	0.050	03/26/2015	ND	1.97	98.3	2.00	3.29	
Total Xylenes*	<0.150	0.150	03/26/2015	ND	5.92	98.7	6.00	2.84	
Total BTEX	<0.300	0.300	03/26/2015	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 61-154

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	03/26/2015	ND	432	108	400	3.77	

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	03/27/2015	ND	203	102	200	0.802	
DRO >C10-C28	150	10.0	03/27/2015	ND	212	106	200	1.15	

Surrogate: 1-Chlorooctane 88.4 % 47.2-157

Surrogate: 1-Chlorooctadecane 120 % 52.1-176

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Received:	03/25/2015	Sampling Date:	03/24/2015
Reported:	03/27/2015	Sampling Type:	Soil
Project Name:	NMN RIGHT HAND CANYON #34 FEDER/	Sampling Condition:	Cool & Intact
Project Number:	OXY-15-003	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP-4 WEST WALL (H500795-04)

BTEX 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	03/26/2015	ND	2.20	110	2.00	3.92		
Toluene*	<0.050	0.050	03/26/2015	ND	1.98	98.9	2.00	2.08		
Ethylbenzene*	<0.050	0.050	03/26/2015	ND	1.97	98.3	2.00	3.29		
Total Xylenes*	<0.150	0.150	03/26/2015	ND	5.92	98.7	6.00	2.84		
Total BTEX	<0.300	0.300	03/26/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 61-154

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	224	16.0	03/26/2015	ND	432	108	400	3.77		

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	03/27/2015	ND	203	102	200	0.802		
DRO >C10-C28	<10.0	10.0	03/27/2015	ND	212	106	200	1.15		

Surrogate: 1-Chlorooctane 96.0 % 47.2-157

Surrogate: 1-Chlorooctadecane 101 % 52.1-176

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 Fax To: (575) 393-4388

Received:	03/25/2015	Sampling Date:	03/24/2015
Reported:	03/27/2015	Sampling Type:	Soil
Project Name:	NMN RIGHT HAND CANYON #34 FEDER/	Sampling Condition:	Cool & Intact
Project Number:	OXY-15-003	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP-5 NORTH WALL (H500795-05)

BTEX 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	03/26/2015	ND	2.20	110	2.00	3.92		
Toluene*	<0.050	0.050	03/26/2015	ND	1.98	98.9	2.00	2.08		
Ethylbenzene*	<0.050	0.050	03/26/2015	ND	1.97	98.3	2.00	3.29		
Total Xylenes*	<0.150	0.150	03/26/2015	ND	5.92	98.7	6.00	2.84		
Total BTEX	<0.300	0.300	03/26/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 105 % 61-154

Chloride, SM4500CI-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	03/26/2015	ND	432	108	400	3.77		

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	03/27/2015	ND	203	102	200	0.802		
DRO >C10-C28	<10.0	10.0	03/27/2015	ND	212	106	200	1.15		

Surrogate: 1-Chlorooctane 90.5 % 47.2-157

Surrogate: 1-Chlorooctadecane 104 % 52.1-176

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 Bob Allen
 703 East Clinton
 Hobbs NM, 88240
 Fax To: (575) 393-4388

Received:	03/25/2015	Sampling Date:	03/24/2015
Reported:	03/27/2015	Sampling Type:	Soil
Project Name:	NMN RIGHT HAND CANYON #34 FEDER/	Sampling Condition:	Cool & Intact
Project Number:	OXY-15-003	Sample Received By:	Jodi Henson
Project Location:	EDDY COUNTY, NM		

Sample ID: SP-6 EAST WALL (H500795-06)

BTEX 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	03/26/2015	ND	2.20	110	2.00	3.92		
Toluene*	<0.050	0.050	03/26/2015	ND	1.98	98.9	2.00	2.08		
Ethylbenzene*	<0.050	0.050	03/26/2015	ND	1.97	98.3	2.00	3.29		
Total Xylenes*	<0.150	0.150	03/26/2015	ND	5.92	98.7	6.00	2.84		
Total BTEX	<0.300	0.300	03/26/2015	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 61-154

Chloride, SM4500CI-B		mg/kg		Analyzed By: AP						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	64.0	16.0	03/26/2015	ND	432	108	400	3.77		

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	03/27/2015	ND	203	102	200	0.802		
DRO >C10-C28	<10.0	10.0	03/27/2015	ND	212	106	200	1.15		

Surrogate: 1-Chlorooctane 96.6 % 47.2-157

Surrogate: 1-Chlorooctadecane 109 % 52.1-176

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*=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



Celey D. Keene, Lab Director/Quality Manager

Appendix B

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, Artec, 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

OPERATOR

Initial Report Final Report

Name of Company: OXY Permian	Contact: Christopher Jones
Address: 1502 W Commerce Dr.	Telephone No. 575-499-3337
Facility Name: Righthand Canyon 34 Fed Battery	Facility Type:
Surface Owner	Mineral Owner
API No. 30-015-32807	

LOCATION OF RELEASE

Unit Letter	Section:	Township:	Range	Feet from the	North/South Line	Feet from the	East/West Line	County:
O	34	21S	24E	1176	S	2123	E	Eddy

Latitude 32.40178 Longitude -104.5229

NATURE OF RELEASE

Type of Release: Produced Water	Volume of Release: 8-10 BBLS Water	Volume Recovered: 0
Source of Release: Victollic	Date and Hour of Occurrence: 1/10/2015	Date and Hour of Discovery: 1/10/2015
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour:	
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.*		
4 inch Victollic on water line came loose causing an impact an approximate 384 sq. ft. of ground area in battery area.		
Describe Area Affected and Cleanup Action Taken.*		
Safety & Environmental Solutions, Inc. submitted a plan of remediation to regulatory authorities on February 18, 2015 and was approved on 02-19-2015 and 02-23-2015 respectively by said authorities. Work was complete and final labs submitted on March 24, 2015.		
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: Chris Jones <small>Digitally signed by Chris Jones DN: cn=Chris Jones, o=ox, email=ckjones00@yahoo.com, c=US Date: 2015.03.31 20:48:46 -0700</small>	OIL CONSERVATION DIVISION	
Printed Name Christopher Jones:	Approved by Environmental Specialist:	
Title: HES Specialist	Approval Date:	Expiration Date:
E-mail Address: Christopher_jones@oxy.com	Conditions of Approval:	
Date: 3-31-15 Phone: 575-499-3337	Attached <input type="checkbox"/>	

* Attach Additional Sheets If Necessary

HES Specialist

3-31-15

Appendix C

Site Photographs

Site Photographs

NMN Right Hand Canyon #34 Federal Battery
Unit Letter O, Sec.34, TS 21S, R 24E



Location January 2015





March 2015 Backfill NE



March 2015 Backfill North



March 2015 Backfill South



March 2015 Backfill West

Appendix D

Groundwater Study



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

{A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters) (In feet)

POD Number	POD Sub-Code	basin	County	Q Q Q			Sec	Tws	Rng	X	Y	Depth Well	Depth Water	Water Column
				64	16	4								
C 01136	C	ED		4	3	28	21S	24E	546455	3589868*	138	83	55	
C 01530	C	ED		1	2	26	21S	24E	550416	3591200*	185	150	35	

Average Depth to Water: **116 feet**

Minimum Depth: **83 feet**

Maximum Depth: **150 feet**

Record Count: 2

PLSS Search:

Section(s): 26, 27, 28, 33, 35 Township: 21S Range: 24E

*UTM location was derived from PLSS - see Help

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