

June 11, 2009

State Environmental Commission
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701-5249

Holly Bute, Churchill County resident
P.O. Box 1120
Fallon, NV 89406

RE: SEP for Air Quality Violation No. 2146,
Agenda item 2, 6/17/2009 regulatory hearing

Honorable Commissioners for the State of Nevada Environmental Commission;

I am writing you as a concerned citizen of Churchill County, Nevada. I live within site of Bango Oil , the party that committed the alleged violation referenced above.

I am writing to you in hope that you will consider my concerns regarding this proposed settlement agreement before making a final decision.

As you have no doubt read in the SEP report, Bango Oil intentionally and willfully went against specific orders given to them by NDEP in regards to installing un permitted equipment, thereby committing a major air quality violation with an assessed \$100,000 fine.

This supplemental environmental project is being proposed as mitigation for the violation, and I would like to contest that proposal for these reasons;

- The State of Nevada could use the fine levied against this company, as we have a budget crisis.
- This SEP does not benefit the residents of the area in any way.
- This SEP allows Bango a cheap and convenient way to get rid of their waste water, which they have been having to haul away from the plant up to this point.
- This SEP allows Bango oil to dump their treated effluent on the ground, and I do not believe there have been sufficient studies performed that will assure citizens of Nevada that there groundwater supply will not be contaminated by this discharge. The water table in this area is as high as 16 feet in some places. All residences are completely dependent on their groundwater.
- There has not been any study done to show that the Carson River, which is a federally protected waterway, will not be contaminated in some way by this discharge. The Carson is down hill from this facility, and the Truckee Canal, that empties into Lake Lahontan, is only ¼ mile from this facility.
- There is no security bond requested from this company for mitigation of possible environmental damages that could come from this much water being discharged.
- The well permit for this company allows for a maximum amount of 4000 gallons a day to be pumped from their well, and there are no pump reports for review. Where does the water come from as the permit will allow up to 14,000 gallons a day of treated effluent to be dumped onto the ground?

It is for these compelling reasons that I respectfully request that this mitigation agreement be denied as presented, and the SEP be modified to protect citizens rights to a clean water supply.

I cannot help but worry that a company that would intentionally disobey an order from NDEP would not hesitate to do so again. I think one way to perhaps help prevent that from happening is by severe penalty, and a penalty that doesn't benefit them in any way.

Thank you for your time and consideration in this very important matter.

Respectfully submitted,



Holly Bute
P.O. Box 1120
Fallon, NV 89407

Cc/
Jim Gibbons, Governor
Allen Biaggi Director NDEP
Melissa Marr, Basin 101 Engineer DCNR
Kevin Wong, USEPA San Francisco
Pam Moore, Churchill County Commissioners

Attachments
SEP proposal
DWR permit 71313

IN THE MATTER OF:
BANGO OIL, LLC
CHURCHILL COUNTY, NV

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)
)
)

NOTICE OF ALLEGED AIR
QUALITY VIOLATION NO. 2146

ADMINISTRATIVE SETTLEMENT AND ORDER

The State of Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Air Pollution Control (herein after referred to as "DCNR-DEP-BAPC") issued Notice of Alleged Air Quality Violation and Order No. 2146 dated December 8, 2008, which alleged violation of Nevada Administrative Code (NAC) 445B.275 "Violations: Acts constituting; notice." The violation was issued to Bango Oil, LLC (Bango Oil) for commencing construction or modification of a stationary source without applying for and receiving a modification of an operating permit.

The DCNR-DEP-BAPC and Bango Oil, hereinafter referred to as the Parties, do jointly desire to enter into this Settlement and Order to resolve the allegations contained in Notice of Alleged Air Quality Violation and Order No. 2146. The provisions of this Notice of Settlement and Order shall apply to and be binding upon all the Parties to this action, their officers, directors, agents, servants, employees, successors, and assigns.

The Parties do hereby enter into this Notice of Settlement and Order.

FINDINGS

- 1 . Bango Oil, LLC (Bango Oil) operates a waste oil re-refining facility at 22211 Bango Road, Fallon, NV 89406 in Churchill County, Nevada. On January 25, 2008 the Nevada Division of Environmental Protection - Bureau of Air Pollution Control (NDEP-BAPC) issued revised Class II Air Quality Operating Permit AP2922-1473 to Bango Oil for the facility.

- 2 . On February 26, 2008 Bango Oil requested permission from the NDEP-BAPC to offload a burner associated with a planned, but as yet unpermitted, modification to the plant. Bango Oil explained that the "application and documents for the amended air permit for the added burner ... should be submitted to your office in the next two weeks." The NDEP-BAPC approved of the request, requiring that Bango Oil "leave the unit in its packing crate ... to help reinforce that it hasn't been installed and is inoperable." The NDEP-BAPC reinforced its general policy that only the construction of concrete pads for equipment is allowable prior to its being incorporated in a revised operating permit.

- 3 . On July 30, 2008 Bango Oil submitted an application to revise Permit AP2922-1473. The revision would reconfigure the permit to double the volume of used oil that can be refined, add a hydrotreating filtration system, replace the existing thermal combustor, modify emissions limits and operating parameters for cooling tower #1, add two cooling towers and a process heater.

- 4 . On Sept. 25, 2008 at the request of Bango Oil, the NDEP-BAPC and Bango Oil teleconferenced to discuss the process for public notice and comment regarding the pending application and what actions could be undertaken by Bango Oil in advance of permit issuance. The NDEP-BAPC confirmed that no construction of unpermitted equipment could take place, that only the construction of concrete pads may be allowed in advance of a permit modification.

- 5 . On October 30, 2008, an NDEP-BAPC inspector discovered that Bango Oil had constructed much of the unpermitted hydrotreating system and a cooling tower. The inspector photographed construction work underway; none of the unpermitted equipment was operating.

FINDINGS

6 . On November 5, 2008 Bango Oil said that the company had already constructed the concrete pads and hydrogen storage tanks as of Sept. 25, 2008. Other processing units and emission devices had been placed on the pads but not anchored or connected.

7 . On November 6, 2008 the NDEP-BAPC issued Stop Order No. 2009-04 to Bango Oil. This ordered Bango Oil to stop the construction, alteration, operation and installation of any and all processing systems at the site until the NDEP-BAPC could determine the extent of modifications to the permitted facility.

8 . On November 7, 2008 NDEP-BAPC inspectors confirmed that the unpermitted hydrotreater and cooling tower had been fully constructed and connected to the plant's permitted processing systems. These actions constitute major violations under paragraph 1(d) of Nevada Administrative Code (NAC) 445B.275. **Violations: Acts constituting; notice**, which states that, "Commencing construction or modification of a stationary source without applying for and receiving an operating permit or a modification of an operating permit" represents a major violation.

9 . On November 12, 2008 Bango Oil submitted photographic evidence that it had severed all pipe connections between the permitted systems (the "base plant") and the unpermitted equipment, to ensure that the unpermitted equipment could not be operated.

10 . On November 14, 2008 the NDEP-BAPC lifted Stop Order No. 2009-04 and issued Stop Order No. 2009-04A, which allows Bango Oil to operate only those systems currently listed under Class II Air Quality Operating Permit AP2922-1473, i.e. the "base plant" (systems 1-4). Stop Order 2009-4A reiterates that construction, alteration, installation and operation of the hydrotreating filtration system and other unpermitted systems are not allowed until a revised Permit AP2922-1473 is issued that covers these systems.

11 . On December 4, 2008 the NDEP-BAPC and Bango Oil met to address the alleged violation of NAC 445B.275.1 (d). Bango Oil admitted that the company had begun construction of the concrete pads, hydrogen storage tanks, and facility superstructure before July 2008. In its defense, Bango Oil said that it believed that construction of all the equipment except for the combustion unit (the burner) were allowed based on its

FINDINGS

permitting and construction experience with the utility industry in other states. The NDEP-BAPC confirmed that the construction of any emission unit in advance of a permit modification constitutes a violation, and that it would be issuing a Notice of Alleged Air Quality Violation and Order (NOAV) to Bango Oil.

1 2 . During the conference on December 4, the NDEP-BAPC said that it would consider allowing Bango Oil to complete a Supplemental Environmental Project (SEP) to provide for settlement of the forthcoming NOAV. The SEP must conform to the NDEP's SEP policy, which requires that a SEP mitigate at least one hundred twenty-five percent (125 %) of the potential administrative fine represented by the alleged violation, and generally requires a minimum cash penalty. Bango Oil stated that the company would provide the NDEP-BAPC with a proposal for a SEP.

1 3 . On December 8, 2008 the NDEP-BAPC issued NOAV No. 2146 to Bango Oil for "commencing construction or modification of a stationary source without applying for and receiving an operating permit or a modification of an operating permit." Based on the presence of two unpermitted systems and duration of at least 18 weeks, application of the Administrative Penalty Table and Penalty Matrix call for an administrative penalty of one hundred eight thousand dollars (\$108,000) for this non-emissions violation. In some circumstances, the NDEP's SEP policy allows 100% of the penalty to be mitigated by a SEP; in this case, however, the NDEP has determined that a cash penalty of ten thousand dollars (\$10,000) is warranted. Hence an approved SEP must total at least 125% of the remaining penalty of ninety-eight thousand dollars (\$98,000), or one hundred twenty-two thousand five hundred dollars (\$122,500).

1 4 . On December 18, 2008 Bango Oil proposed a SEP that involves purchasing, installation and operation of a secondary water treatment system to treat "process water" (waste water) generated by the facility's re-refining of waste oil. The 'Beckart' dissolved air flotation (DAF) system currently in use employs coagulant, polymers and pH adjustment to treat process water but fails to achieve the water quality required for reuse in the plant or for surface application. Currently process water that cannot be stored on-site must be removed for disposal at another facility or destroyed in the thermal combustor (permitted system 4). In order to achieve the

FINDINGS

desired water quality, Bango Oil proposed installing a two-phase water treatment system downstream of (in addition to) the DAF system.

1 5 . The proposed secondary treatment system went through a number of design changes before being finalized in February 2009. The proposed system is designed to remove required petroleum, emulsified hydrocarbons and gases, organic and inorganic compounds from the waste water. The initial phase will involve the installation of a "FLOCCIN" emulsion cracking agent and a Filter Press in sequence with the existing DAF. This system will be followed in series by a dual element filter (sand/garnet media), an air stripper system, and ultimately by an activated carbon and activated clay adsorption system for final treatment and polishing. Contaminants removed from the Filter Press, and the loaded carbon and clay removed from the adsorption system, shall be disposed of at an appropriate off-site facility. Hence, the process water treatment system at Bango Oil will ultimately be comprised of a FLOCCIN-DAF-Filter Press system followed in series by dual element filter, air stripping, and activated clay/carbon to achieve the desired water quality. On February 10, Bango Oil provided the NDEP-BAPC with a revised estimate of \$150,000 for the total cost of the SEP.

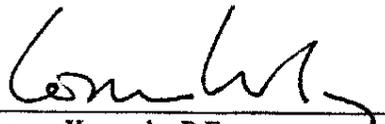
All of the water generated by the re-refining process would be treated to achieve the water quality required for surface application or plant reuse. The treated water would not be expected to meet drinking water quality standards. Any "surplus" water - i.e., treated process water in excess of that required for fire suppression (stored in tanks onsite) or plant reuse for wash water and cooling tower makeup water - would be used each day for wet dust suppression on dirt roads in the vicinity of the Bango Oil plant, primarily to control fugitive dust on Bango Road. Bango Oil shall operate a 4,000 gallon water truck to ensure that these requirements are met. Any excess water from the treatment system would be available for use by other entities for non-potable, surface water applications.

1 6 . The NDEP-BAPC finds that the proposed SEP meets the minimum expenditure of \$122,500. By producing water that can be used for fire suppression, other plant needs, and wet dust suppression from unusable "process" water, the proposed SEP would benefit air quality and water resources. With elimination

FINDINGS

of the thermal combustor or other water treatments that require combustion, the SEP will eliminate a potential source of odors, diminish pollutant emissions, and prevent destruction of the water resource. The proposed project will offset demands on the local, potable groundwater source by providing up to 6,000 gallons/day of non-potable water for plant reuse and surface applications. It will help control fugitive dust on Bango Road and other dirt roads in the vicinity of the plant by providing an accessible local source of water.

2/11/2009
Date


Lawrence Kennedy, P.E.
Supervisor, Compliance and Enforcement Branch
NDEP Bureau of Air Pollution Control

ORDER

The following Order is issued this date pursuant to the powers and duties vested in the Director of the Department of Conservation and Natural Resources by Nevada Revised Statutes 445B.230, subsection 1, and 445B.450, subsection 5.

On the basis of the Findings attached hereto and made a part of this Order, the Administrator of the Division of Environmental Protection, pursuant to authority delegated to him by the Director, Department of Conservation and Natural Resources, has determined that Bango Oil, LLC (Bango Oil) shall comply with the provisions of this Order.

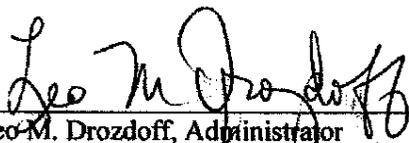
In consideration of the foregoing, IT IS ORDERED that Bango Oil shall complete the following in settlement of NOAV No. 2146:

1. Bango Oil shall pay an administrative penalty to the State of Nevada in the amount of Ten Thousand Dollars (\$10,000).
2. Bango Oil shall complete a Supplemental Environmental Project (SEP) that treats all of the water generated by the re-refining process to achieve the water quality required for surface application or plant reuse. The SEP involves installation and operation of a multiphase, secondary water treatment system to meet this objective. The components of this secondary treatment system shall complement operation of the existing, primary Beckart DAF system. The treated water shall not be expected to meet drinking water quality standards.
3. The treated process water shall be used for fire suppression, plant reuse for wash water and cooling tower makeup water, and wet dust suppression. Any "surplus" water – i.e., treated water in excess of that required for fire suppression or plant reuse – shall be used each day for wet dust suppression on dirt roads in the vicinity of the Bango Oil plant, primarily to control fugitive dust on Bango Road. Any water in excess of that required for dust abatement shall be available for use by other entities for non-potable, surface water applications.
4. On or before February 12, 2009, Bango Oil shall commit to purchasing the following equipment, which comprise the secondary water treatment system: a "FLOCCIN" emulsion cracking agent; a Filter Press; a dual element filter; air stripper; and an activated carbon and clay adsorption system.

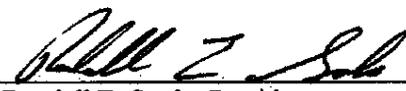
ORDER

5. On or before March 31, 2009, Bango Oil shall apply for any necessary permits required for the new equipment included in the SEP.
6. On or before June 15, 2009, Bango Oil shall install all of the components of the secondary water treatment system.
7. On or before July 15, 2009, Bango Oil shall commence operation of the secondary water treatment system.
8. On or before July 15, 2009, Bango Oil, LLC shall begin operation of a 4,000 gallon water truck capable of dispensing all "surplus" treated water for wet dust suppression.
9. On or before July 15, 2009, Bango Oil shall provide full financial accounting of its expenditures for the SEP. Expenditures must be verified by submittal of receipts for all services, equipment, labor and materials attributable to the SEP. Total expenditures must meet or exceed one hundred twenty-two thousand five hundred dollars (\$122,500).
10. Failure to comply with any of the requirements of this Settlement and Order shall result in an administrative penalty of one thousand dollars (\$1,000) per week.

DATED this 11th day of
February, 2009


Leo M. Drozdoff, Administrator
Division of Environmental Protection
901 South Stewart St., Suite 4001
Carson City, NV 89701-5249

DATED this 11th day of
FEB, 2009


Randall E. Soule, President
Bango Oil, LLC
16640 Wedge Parkway
Reno, NV 89511-8170

Administrative Settlement and Order entered in accordance with the foregoing this _____ day of _____, 2009.

for the Nevada State Environmental Commission



State of Nevada
 Department of Conservation & Natural Resources
Division of Water Resources
 Tracy Taylor, P. E. State Engineer

Water Rights Database, Page 2
Due Dates and Maps

New Search General Information **Maps and Due Dates** Place of Use Abrogations/Protests/Rulings Ownership/Title

Application No.: 71713 **Application Status:** PER **Certificate No.:**

Filing Date: 09-21-2004 Priority Date: 09-21-2004 Return Date: 10-13-2004
 Sent for Publication Date: 11-30-2004 Last publication Date: 12-29-2004 Ready for Action Date: 01-28-2005
 Permit Date: 08-08-2005 Withdrawn Date: Forfeit Date:
 Cancel Portion: Cancellation Date: Cancellation Rescind Date:
 Denied Date:

Maps

Filed Under	Date	Filed Under	Date
Proposed POD: <u>71713</u>	11-16-2004	Existing POD:	
Proposed POU:		Existing POU:	

Proofs of Completion and Beneficial Use

Due Date:	Rcvd:	Filed:	Ext. Due:	Ext Rcvd:
POC: 09-08-2006		10-13-2006		
PBU: 09-08-2009			Y	

Other Dates and Requirements

Cultural Map: PBU Map Received: PBU Map Filed Under: Certificate Date:
 Forfeiture Due Date: Extension required?: Forfeiture Portion: Forfeiture Received: Forfeiture Filed:
 Temporary Expiration Date: Other Date: Reporting Required?: A
 Remarks 2:

NO. 71713

AMENDED
APPLICATION FOR PERMIT TO APPROPRIATE THE PUBLIC
WATERS OF THE STATE OF NEVADA

Date of filing in State Engineer's Office * SEP 21 2004 *
Returned to applicant for correction OCT 13 2004
Corrected application filed NOV 16 2004
Map filed NOV 16 2004

The applicant Best Energy, LLC. hereby make an application for permission to appropriate the public waters of the State of Nevada, as hereinafter stated. February 25, 2002 State of Nevada

1. The source of the proposed appropriation is **underground source**
2. The amount of water applied for is **0.03565** second feet.
 - (a) If stored in reservoir give number of acre-feet **N/A**
3. The water to be used for **Industrial Process Facility**
4. If use is for:
 - (a) Irrigation, state number of acres to be irrigated **N/A**
 - (b) Stockwater, state number and kind of animals to be watered **N/A**
 - (c) Other use (describe fully under No. 12. "Remarks") **Industrial Facility**
 - (d) Power:
 - (1) Horsepower developed **N/A**
 - (2) Point of return of water to stream **N/A**
5. The water is to be diverted from its source at the following point **SW¼ NW¼ Sec. 23, T19N, R26E, MDB&M, or at a point from which the NW corner of said section 23, bears N20°47'16"W a distance of 1,825.54 feet.**
6. Place of Use **portions of the SW¼ and the NW¼ Section 23, T19N, R26E, MDB&M.**
7. Use will begin about **January 1** and end about **December 31** of each year.
8. Description of proposed works **Drilled well (6" casing) with 1½ HP submersible Pump**
9. Estimated cost of works **\$16,000.00**
10. Estimated time required to construct works **Four (4) weeks**
11. Estimated time required to complete the application of water to beneficial use **One (1) year**
12. Remarks: **Water (4,000,000, gallons per year ±) is to be used to support the operation of an industrial oil re-refining facility, processing 22,000 gallons of recycled fuel oil on a daily basis.**

By **John P. Solaro, Beat Energy, LLC.**
s/ John P. Solaro
687 Edison Way
Reno, NV 89502

Compared sg/ sc 1t/gkl

Protested _____

71713

Page 2 of 3

APPROVAL OF STATE ENGINEER

This is to certify that I have examined the foregoing application, and do hereby grant the same, subject to the following limitations and conditions:

This permit is issued subject to existing rights. It is understood that the amount of water herein granted is only a temporary allowance and that the final water right obtained under this permit will be dependent upon the amount of water actually placed to beneficial use. It is also understood that this right must allow for a reasonable lowering of the static water level. This well shall be equipped with a two (2) inch opening for measuring depth to water. If the well is flowing, a valve must be installed and maintained to prevent waste. A totalizing meter must be installed and maintained in the discharge pipeline near the point of diversion and accurate measurements must be kept of water placed to beneficial use. The totalizing meter must be installed before any use of water begins, or before the Proof of Completion of Work is filed. This source is located within an area designated by the State Engineer, pursuant to NRS 534.030. The State retains the right to regulate the use of the water herein granted at any and all times.

This permit does not extend the permittee the right of ingress and egress on public, private or corporate lands.

The issuance of this permit does not waive the requirements that the permit holder obtain other permits from State, Federal and local agencies.

This permit is issued under the provisions of NRS 534.120(2) as a preferred use.

Any well drilled under this permit shall be drilled in what has been described in the United States Geological Survey Water Supply Paper 2263 as the intermediate alluvial aquifer. In no instance shall the seal on this well be less than 100 feet below ground level.

Monthly records shall be kept of the amount of water pumped from this well and the records submitted to the State Engineer on February 15th of each year.

(CONTINUED ON PAGE 3)

The amount of water to be appropriated shall be limited to the amount which can be applied to beneficial use, and not to exceed 0.03565 cubic feet per second, 4.48 **acre-feet annually**

Work must be prosecuted with reasonable diligence and be completed on or before:

August 8, 2006

Proof of completion of work shall be filed on or before:

September 8, 2006

Water must be placed to beneficial use on or before:

August 8, 2007

Proof of the application of water to beneficial use shall be filed on or before:

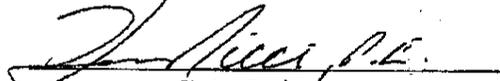
September 8, 2007

Map in support of proof of beneficial use shall be filed on or before:

N/A

IN TESTIMONY WHEREOF, I, HUGH RICCI, P.E.,
State Engineer of Nevada, have hereunto set
my hand and the seal of my office.

this 8th day of August A.D. 2005


State Engineer

Completion of work filed _____

Proof of beneficial use filed _____

Cultural map filed N/A _____

Certificate No. _____ Issued _____

WHITE-DIVISION OF WATER RESOURCES
CANARY-CLIENT'S COPY
PINK-WELL DRILLER'S COPY

STATE OF NEVADA
DIVISION OF WATER RESOURCES

OFFICE USE ONLY	
Log No.	98431
Permit No.	
Basin	101

PRINT OR TYPE ONLY
DO NOT WRITE ON BACK

WELL DRILLER'S REPORT

Please complete this form in its entirety in accordance with NRS 534.170 and NAC 534.340

NOTICE OF INTENT NO. 54312

1. OWNER Best Energy LLC ADDRESS AT WELL LOCATION 14900 Bangs Rd
MAILING ADDRESS _____

2. LOCATION SW 1/4 NW 1/4 Sec. 23 T. 19 N/S R. 26 E Churchill Co County
PERMIT NO. 71713 Issued by Water Resources Parcel No. 007-021-78 Subdivision Name _____

3. WORK PERFORMED
 New Well Replace Recondition
 Deepen Abandon Other _____
4. PROPOSED USE
 Domestic Irrigation Test
 Municipal/Industrial Monitor Stock
5. WELL TYPE
 Cable Rotary RVC
 Air Other well

6. LITHOLOGIC LOG

Material	Water Strata	From	To	Thickness
<u>Sand + clay</u>		<u>0</u>	<u>42'</u>	<u>42'</u>
<u>Volcanic Rock</u>		<u>42'</u>	<u>250'</u>	<u>208'</u>
<u>Volcanic Rock with fractures</u>	<input checked="" type="checkbox"/>	<u>250'</u>	<u>300'</u>	<u>50'</u>

8. WELL CONSTRUCTION

Depth Drilled 300' Feet Depth Cased 300' Feet

HOLE DIAMETER (BIT SIZE)

	From	To
<u>10 5/8</u> Inches	<u>0</u> Feet	<u>60</u> Feet
<u>8 3/4</u> Inches	<u>60</u> Feet	<u>300'</u> Feet

CASING SCHEDULE

Size O.D. (Inches)	Weight/Ft. (Pounds)	Wall Thickness (Inches)	From (Feet)	To (Feet)
<u>10 5/8</u>		<u>.188</u>	<u>71</u>	<u>300</u>

Perforations:
Type perforation 1/8 x 3 Samed
Size perforation 8 FLOW
From 260' feet to 300' feet
From _____ feet to _____ feet
From _____ feet to _____ feet
From _____ feet to _____ feet

Surface Seal: Yes No Seal Type:
Depth of Seal 100' Neat Cement
Placement Method: Pumped Cement Grout
 Poured Concrete Grout
Gravel Packed: Yes No
From 100' feet to 300' feet

9. WATER LEVEL
Static water level 53' feet below land surface
Artesian flow _____ G.P.M. _____ P.S.I.
Water temperature cold F Quality clear

10. DRILLER'S CERTIFICATION
This well was drilled under my supervision and the report is true to the best of my knowledge.
Name Jack Drilling Inc Contractor
Address 2010 + 599 Contractor
Bellevue Springs NV
Nevada contractor's license number 31841 issued by the State Contractor's Board
Nevada driller's license number issued by the Division of Water Resources, the on-site driller 1748
Signed [Signature]
By driller performing actual drilling on site or contractor
Date 12/9/05

Date started 9/16/05, 20 _____
Date completed 9/25/05, 20 _____

7. WELL TEST DATA

TEST METHOD: Bailer Pump Air Lift

G.P.M.	Draw Down (Feet Below Static)	Time (Hours)
<u>air lifted 50 Gpm from 200' feet. 2 hrs.</u>		

RECEIVED
2005 OCT 12 AM 11:10
STATE ENGINEERS OFFICE