ILLINOIS EPA RCRA CORRECTIVE ACTION CERTIFICATION

This certification must accompany any document submitted to Illinois EPA in accordance with the corrective action requirements set forth in a facility's RCRA permit. The original and two copies of all documents submitted must be provided.

Name: WRB Refining LLC - Wood River R	efinery County: Madison
Street Address: 900 South Central Ave.	Site No. (IEPA): 1191150002
City: Roxana, IL 62084	Site No. (USEPA): ILD 080 012 305
OWNER INFORMATION	3.0 OPERATOR INFORMATION
Name: Not Applicable	Equilon Enterprises LLC d/b/a Shell Oil Products US
Mailing Address:	17 Junction Drive, PMB #399
	Glen Carbon, IL 62034
Contact Name:	Kevin Dyer
Contact Title:	Principal Program Manager
Phone No.:	618-288-7237
TYPE OF SUBMISSION (check applicable	e item and provide requested information, as applicable)
RFI Phase I Workplan/Report	IEPA Permit Log No. B-43-R
RFI Phase II Workplan/Report	Date of Last IEPA Letter
CMP Report; Phase	on Project 11/15/10
Other (describe): Day Report	Log No. of Last IEPA Letter on Project B-43R-CA-2
Date of Submittal March 4, 2011	
DESCRIPTION OF SUBMITTAL: (briefl	ly describe what is being submitted and its purpose)
30 Day Report in accordance with Part B Per	mit Section IV(J)(15)(c)
OCUMENTS SUBMITTED (identify all	documents in submittal, including cover letter; give dates of all documents)

7.0 CERTIFICATION STATEMENT - (This statement is part of the overall certification being provided by the owner/operator, professional and laboratory in Items 7.1, 7.2 and 7.3 below). The activities described in the subject submittals have been carried out in accordance with procedures approved by Illinois EPA. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For:	ARCRA Corrective Action Certification 30 Day Report of Submission: 3/4/11		
7.1	OWNER/OPERATOR CERTIFICATION (Must be complete set forth in 35 IAC 702.126.) All submittals pertaining to the signed by the person designated below (or by a duly authorized 1. For a Corporation, by a principal executive off 2. For a Partnership or Sole Proprietorship, by a second 3. For a Governmental Entity, by either a principal A person is a duly authorized representative only if: 1. the authorization is made in writing by a person the written authorization is provided with this suited). Owner Signature:	icer of at least the level of vice-president. general partner or the proprietor, respective al executive officer or a ranking elected off an described above; and submittal (a copy of a previously submitted	ely. ficial.
	Title:	(Date)	
	4/10		
	Title: Principal Program Man		
7.2	PROFESSIONAL CERTIFICATION (if necessary) - Work to other laws governing professional services, such as the Illin Engineering Practice Act of 1989, the Professional Geologist 1989. No one is relieved from compliance with these laws and within the scope and definitions of these laws must be perform discovered violation of these laws to the appropriate regulating	nois Professional Land Surveyor Act of 1981 Licensing Act, and the Structural Engineer of the regulations adopted pursuant to these med in compliance with them. The Illinois	89, the Professional ring Licensing Act of e laws. All work that falls
	Professional's Signature:	Professional's Seal:	IAL
	Professional's Name: Rubelt B Billman	Professional's Seal:	166
	Professional's Address: URS (υς). 1001 Highlands flaz St Lυιύ, Mo 6311 Professional's Phone No.: (314) 429-0100	0 ROBERT B. BIL 196-00064	178
	Professional's Phone No.:	ILLINOIS	
7.3	<u>LABORATORY CERTIFICATION</u> (if necessary) - The sar efforts for which this laboratory was responsible were carried	mple collection, handling, preservation, pr	reparation and analysis
	Name of Laboratory		
		Signature of Laboratory Responsible Officer	Date
	Mailing Address of Laboratory	Name and Title of Laboratory Res	ponsible Officer

JM:bjh\RCRA-CORRECTIVE-ACTION-CERTIFICATION-FORM.DOC



March 4, 2011

Mr. Stephen Nightingale, P.E. Manager, Permit Section Illinois Environmental Protection Agency Bureau of Land 1021 North Grand Avenue East Springfield, IL 62794

Subject: 30 Day Report – Groundwater Flow Control

WRB Refining LLC Wood River Refinery

Roxana, Illinois

119115002 - Madison County

Equilon Enterprises LLC d/b/a Shell Oil Products US

Log No. B-43-R

Dear Mr. Nightingale:

On behalf of Shell Oil Products US (SOPUS), URS Corporation (URS) is submitting this report in fulfillment of Condition(IV)(J)(15)(c) of SOPUS' RCRA Part B Permit (Permit). This condition requires submittal of a report which describes the actions taken to regain control of groundwater flow.

INTRODUCTION AND BACKGROUND

Condition IV(A)(1) of the Permit requires "...control of horizontal and vertical groundwater flow in the uppermost aquifer such that the groundwater flow is towards the interior of the facility along the combined boundaries of North and Main Properties." This control is provided by 17 groundwater pumping wells on Main and North properties (**Figure 1**), as listed below:

- Six of the wells are located near the west fenceline of Main and North properties, and are referred to as the "west fenceline wells" for the purposes of this report.
- Ten wells are located between 7th and 11th Streets and are referred to as the "interior wells" for the purposes of this report.
- One well, Well W-68, is located much further east of the "interior wells," and is not specifically referred to in this report.

ConocoPhillips (COP) operates the groundwater pumping system at the facility. The primary purpose of these wells is to furnish water for process cooling needs. As a result of the pumping, a cone of depression is formed such that groundwater flow is inward along the combined boundaries of Main and North properties. Information on these wells is provided in **Table 1**.

Beginning in August 2010, weekly gauging data from well nests indicated that the groundwater gradient in the western part of the refinery was decreasing, but control was maintained (information included in the *Groundwater Monitoring Report* – 2^{nd} *Half 2010* dated January 14, 2011). Groundwater data from the first quarter 2011 gauging event shows that groundwater was not fully controlled along portions of the western boundaries of Main and North properties.

1001 Highland Plaza Drive West, Suite 300 St. Louis, MO 63110 Phone: 314.429.0100

Fax: 314.429.0462



Mr. Stephen Nightingale, P.E. Illinois Environmental Protection Agency March 4, 2011 Page 2

Figure 2 illustrates groundwater contours on January 13-14, 2011. In accordance with the permit, initial notification to the IEPA was made on February 4, 2011.

ACTIONS TAKEN TO REGAIN CONTROL

SOPUS initiated conversations with COP in January and February to discuss the causes for the change in groundwater conditions and actions needed to regain control. The following summarizes these conversations and resulting actions.

- The refinery cooling water demand varies throughout the year, from a low of approximately 2,600 gallons per minute (gpm) in the winter months to highs of approximately 4,000 gpm in the summer months. One condition of the previous RCRA Part B Permit required pumping a minimum of 3,000 gpm from Main and North properties. During times when the cooling water demand was below 3,000 gpm, the excess water was discharged to the process sewer. The renewed permit, which became effective October 28, 2010, does not have a minimum pumping rate. As a result of lower cooling demand, COP lowered the pumping rates below 3,000 gpm beginning in late November 2010. causing the change in groundwater conditions.
- Pumping rates for 2010 and 2011 to date are included in **Table 2**.
- As shown, pumping rates in December 2010 ranged from 2659 to 2933 with an average of 2779.
- As shown, pumping rates in January ranged from approximately 2,504 gpm to 3,330 gpm. Pumping rates from January 1st through 25th averaged 2,708 gpm.
- Upon discovering that groundwater control might have been lost, on January 25th, SOPUS requested that COP increase pumping, and the rate increased to an average of 3,284 gpm for the remainder of the month.
- Pumping rates in February ranged from approximately 3,184 gpm to 3,495 gpm and averaged 3,406 gpm.
 - o Pumping rates on operating wells were initially increased in early February, where possible, to rates above refinery needs based on discussions with SOPUS.
 - Pumping rates were further increased as a result of the following actions by COP (Table 2):
 - Replaced a discharge header from well W-84 to 7th Street.
 - Replaced a pipe spool in a valve box and restarted well W-76.
- At SOPUS' request, COP is performing, or is scheduled to perform, actions to further increase overall pumping capacity, including wellhead and valve repairs, pump replacement, etc (**Table 1**).
- URS is gauging a subset of the facility wells on a weekly basis, beginning January 31, and developing contour maps. These are described below.



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RESULTS OF ACTIONS TAKEN

The operational efforts and increased pumping is showing improved groundwater control, and this is expected to continue. **Figures 3** through 7 are groundwater contour maps that depict conditions between January 31st and February 28th, 2011. These maps illustrate the following:

- Groundwater pumping in the west fenceline production wells has maintained an inward gradient/control along most of this area, except for the extreme northern and southern portions.
- The cone of depression caused by pumping in the interior wells appears to be expanding. The lack of control along the far western portion of Main Property appears to be related to insufficient pumping in the interior production wells. The interior wells typically produce approximately 65 to 75% of the total groundwater from Main and North properties, and currently, only seven of the ten wells in this area are operating.

Figure 8 includes cross section maps along the west fenceline of North Property (section lines are depicted on **Figure 1**) and illustrate the following:

- Section A-A' shows that the gradient has changed from outward to inward over the indicated time period.
- Section B-B' shows that the gradient has been and continues to be inward over the indicated time period.
- Section C-C' shows that the gradient is still outward, but has improved over the indicated time period.

CONCLUSIONS/PATH FORWARD

COP will continue pumping operating wells at the highest rates feasible, and is prioritizing maintenance work described in this report. SOPUS does not anticipate further changes in the groundwater pattern along the west fenceline of North Property, as these wells are generally pumping at or near capacity. SOPUS does anticipate that the increased pumping in the interior wells, at the relatively higher rates, as well as the ongoing and planned repairs, will continue to strengthen and expand the cone of depression, eventually resulting in groundwater control. SOPUS is working with COP to replace one of the groundwater depression wells for additional capacity and backup. SOPUS will continue to monitor the progress of groundwater flow on a weekly basis control is regained.

In parallel with this work, SOPUS is responding to conditions 16 and 17 of the Agency's August 5, 2010 letter to SOPUS and COP. These conditions require information on the groundwater pumping and oil recovery systems and an evaluation of system performance and contingency plans. This evaluation will include a review of hydrogeologic conditions and system

URS

Mr. Stephen Nightingale, P.E. Illinois Environmental Protection Agency March 4, 2011 Page 4

performance information, and may include recommendations for well and/or pumping modifications.

If you have any questions concerning this information, please contact Kevin Dyer, SOPUS Principal Program Manager, at kevin.dyer@shell.com (618) 288-7237, or me at bob-billman@urscorp.com (314) 43-4108.

Sincerely,

Robert B. Billman

Senior Project Manager

Lobert B Billman

Attachments

Table 1	Groundwater Production Well Summary
Table 2	Daily Groundwater Pumping
Figure 1	WRR Facility Map with Groundwater Production Wells and Monitoring Wells
Figure 2	Groundwater Contour Map January 13-14, 2011
Figure 3	Groundwater Contour Map January 31, 2011
Figure 4	Groundwater Contour Map February 7, 2011
Figure 5	Groundwater Contour Map February 14, 2011
Figure 6	Groundwater Contour Map February 21, 2011
Figure 7	Groundwater Contour Map February 28, 2011
Figure 8	Groundwater Cross Sections A-A', B-B' and C-C'

Cc: Kevin Dyer, SOPUS Amy Boley, IEPA

Eric Petersen, COP

Table 1 **Groundwater Production Well Summary**

Well#	Date Installed	Well Screen Material	Well Diameter	Total Depth (ft bos)	Screened Interval (ft bgs)	Screen Length (ft)	Estimated Ground Surface Elevation	Estimated (Screened Interval)	Status			
					"Interior We	ACCOUNT OF THE PERSON	(ft MSL)					
W-39	August-1942	PC	30	137.00	67.00 - 137.00	70	444	377 - 307	Out of service (1)			
W-42	8/5/1942	PC	20	138.00	68.00 - 138.00	70	445	377 - 307	Out of service (1)			
									-			
W-69	3/25/1978	SS	20	140.00	90.00 - 140.00	50	445	355 - 305	Operating			
W-70*	August-1978	SS	20	136.50	96.50 - 136.50	40	445	349 - 309	Operating			
W-72	7/26/1982	SS	20	137.00	97.00 - 137.00	40	445	348 - 308	Out of service (2)			
W-73	8/16/1982	SS	20	135.00	95.00 - 135.00	40	445	349 - 309	Out of service			
W-75*	December-1987	SS	20	140.00	110.00 - 140.00	30	445	335 - 305	Operating			
W-76*	December-1987	SS	20	140.00	110.00 - 140.00	30	443	333 - 303	Operating			
W-82	12/10/2002	SS	20	120.00	100.00 - 120.00	20	445	345 - 325	Operating			
W-84	June-2008	SS	20	137.00	106.00 - 136.00	30	445	339 - 309	Operating			
W-85	March-2010	SS	24	101.90	76.9 - 101.9	25	444	367-342	Operating			
					"West Fenceline	Wells"			o - with the first of the			
W-77	4/30/1990	SS	20	142.00	112.00 - 142.00	30	444	332 - 302	Operating			
W-78	5/2/1990	SS	20	138.33	108.33 - 138.33	30	443	335 - 305	Out of service (3)			
W-79	5/9/1990	SS	20	134.92	104.92 - 134.92	30	443	338 - 308	Operating			
W-80	5/10/1990	SS	20	135.83	105.82 - 135.83	30	443	337 - 307	Operating			
W-81	5/14/1990	SS	20	129.00	99.00 - 129.00	30	444	345 - 315	Operating			
				,在在金幣。即 2. 直接表示。	"East Property	Wells"		ACCOUNTS				
W-68*	12/1/1968	SS	20	130.00	90.00 - 130.00	40	441	351 ≥ 311	Operating			

NOTES:

SS = Stainless Steel

PC = Porous Concrete

NA = Not Available

- Wellhead and valve leaks scheduled for repair in March 2011.
 Repairs planned for week of March 7, 2011.
 New pump/motor scheduled for replacement week of February 28, 2011.

TABLE 2
DAILY WATER PRODUCTION SUMMARY

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GPM	3336	3374	3060	3729	3731	3726	3730	3636	3291	3644	3488	3451	3494	3648	3648	3592	3665	3792	3955	4011	4027	3964	4019	4040	4048	4050	3978	3859	3877	3889	
Date	6/1/2010	6/2/2010	6/3/2010	6/4/2010	. 6/5/2010	6/6/2010	6/7/2010	6/8/2010	6/9/2010	6/10/2010	6/11/2010	6/12/2010	6/13/2010	6/14/2010	6/15/2010	6/16/2010	6/17/2010	6/18/2010	6/19/2010	6/20/2010	6/21/2010	6/22/2010	6/23/2010	6/24/2010	6/25/2010	6/26/2010	6/27/2010	6/28/2010	6/29/2010	6/30/2010	
GPM	3342	3366	3366	3364	3350	3373	3380	3364	3315	3315	3317	3336	3338	3310	3316	3331	3310	3300	3301	3309	3315	3332	3336	3338	3332	3327	3324	3308	3278	3243	3389
Date	5/1/2010	5/2/2010	5/3/2010	5/4/2010	5/5/2010	5/6/2010	5/7/2010	5/8/2010	5/9/2010	5/10/2010	5/11/2010	5/12/2010	5/13/2010	5/14/2010	5/15/2010	5/16/2010	5/17/2010	5/18/2010	5/19/2010	5/20/2010	5/21/2010	5/22/2010	5/23/2010	5/24/2010	5/25/2010	5/26/2010	5/27/2010	5/28/2010	5/29/2010	5/30/2010	5/31/2010
GPM	3247	3248	3247	3233	3206	3265	3294	3373	3367	3405	3404	3383	3390	3443	3460	3423	3423	3423	3410	3373	3414	3449	3465	3444	3313	3307	3288	3291	3327	3332	
Date	4/1/2010	4/2/2010	4/3/2010	4/4/2010	4/5/2010	4/6/2010	4/7/2010	4/8/2010	4/9/2010	4/10/2010	4/11/2010	4/12/2010	4/13/2010	4/14/2010	4/15/2010	4/16/2010	4/17/2010	4/18/2010	4/19/2010	4/20/2010	4/21/2010	4/22/2010	4/23/2010	4/24/2010	4/25/2010	4/26/2010	4/27/2010	4/28/2010	4/29/2010	4/30/2010	
												} :				;::: - ` ' ,															
GPM	3362	3349	3274	3293	3344	3364	3356	3300	2997*	3177	3180	3173	3147	3088	3133	3108	3159	3161	3201	3208	3174	3266	3297	3309	3312	3252	3255	3261	3253	3246	3245
Date	3/1/2010	3/2/2010	3/3/2010	3/4/2010	3/5/2010	3/6/2010	3/7/2010	3/8/2010	3/9/2010	3/10/2010	3/11/2010	3/12/2010	3/13/2010	3/14/2010	3/15/2010	3/16/2010	3/17/2010	3/18/2010	3/19/2010	3/20/2010	3/21/2010	3/22/2010	3/23/2010	3/24/2010	3/25/2010	3/26/2010	3/27/2010	3/28/2010	3/29/2010	3/30/2010	3/31/2010
GPM	3271	3232	3225	3227	3207	3211	3169	3133	3129	3117	3151	3221	3239	3242	3218	3209	3196	3241	3254	3255	3261	3289	3331	3328	3336	3355	3372	3361	2		
Date	2/1/2010	2/2/2010	2/3/2010	2/4/2010	2/5/2010	2/6/2010	2/7/2010	2/8/2010	2/9/2010	2/10/2010	2/11/2010	2/12/2010	2/13/2010	2/14/2010	2/15/2010	2/16/2010	2/17/2010	2/18/2010	2/19/2010	2/20/2010	2/21/2010	2/22/2010	2/23/2010	2/24/2010	2/25/2010	2/26/2010	2/27/2010	2/28/2010			
GPM	3227	3194	3194	3207	3222	3220	3265	3313	3315	3302	3352	3373	3412	3409	3407	3401	3396	3404	3386	3335	3306	3299	3303	3301	3292	3286	3287	3285	3288	3285	3285
Date	1/1/2010	1/2/2010	1/3/2010	1/4/2010	1/5/2010	1/6/2010	1/7/2010	1/8/2010	1/9/2010	1/10/2010	1/11/2010	1/12/2010	1/13/2010	1/14/2010	1/15/2010	1/16/2010	1/17/2010	1/18/2010	1/19/2010	1/20/2010	1/21/2010	1/22/2010	1/23/2010	1/24/2010	1/25/2010	1/26/2010	1/27/2010	1/28/2010	1/29/2010	1/30/2010	1/31/2010

AVERAGE: gpm 3330 gpm AVERAGE: gpm AVERAGE: 3355 gpm AVERAGE: 3242 gpm AVERAGE: 3242 AVERAGE: 3308

gpm

3725

 * Due to a 2.5 hour shutdown of the wells and biotreaters to replace a leaking gasket on the North Property Header.

TABLE 2 DAILY WATER PRODUCTION SUMMARY

_			_							_																				_	_
GPM	2831	2808	2831	2833	2840	2874	2933	2749	2851	2900	2820	2843	2859	2861	2914	2844	2779	2730	2730	2659	2690	2687	2693	2698	2696	2694	2678	2686	2694	2707	2739
Date	12/1/2010	12/2/2010	12/3/2010	12/4/2010	12/5/2010	12/6/2010	12/7/2010	12/8/2010	12/9/2010	12/10/2010	12/11/2010	12/12/2010	12/13/2010	12/14/2010	12/15/2010	12/16/2010	12/17/2010	12/18/2010	12/19/2010	12/20/2010	12/21/2010	12/22/2010	12/23/2010	12/24/2010	12/25/2010	12/26/2010	12/27/2010	12/28/2010	12/29/2010	12/30/2010	12/31/2010
								10.																							
GPM	3375	3371	3431	3303	3156	3070	3068	3128	3139	3109	3106	3058	3010	2999	3091	3125	3096	3108	3111	3116	3115	3092	2487	3069	2951	2950	2962	2930	2857	2844	, , , ii s
Date	11/1/2010	11/2/2010	11/3/2010	11/4/2010	11/5/2010	11/6/2010	11/7/2010	11/8/2010	11/9/2010	11/10/2010	11/11/2010	11/12/2010	11/13/2010	11/14/2010	11/15/2010	11/16/2010	11/17/2010	11/18/2010	11/19/2010	11/20/2010	11/21/2010	11/22/2010	11/23/2010	11/24/2010	11/25/2010	11/26/2010	11/27/2010	11/28/2010	11/29/2010	11/30/2010	
GPM	3250	3314	3311	3271	3313	3316	3289	3298	3310	3281	3277	3271	3198	3211	3323	3408	3369	3312	3283	3340	3306	3280	3331	3342	3370	3388	3362	3186	3196	3355	3350
Date	10/1/2010	10/2/2010	10/3/2010	10/4/2010	10/5/2010	10/6/2010	10/7/2010	10/8/2010	10/9/2010	10/10/2010	10/11/2010	10/12/2010	10/13/2010	10/14/2010	10/15/2010	10/16/2010	10/17/2010	10/18/2010	10/19/2010	10/20/2010	10/21/2010	10/22/2010	10/23/2010	10/24/2010	10/25/2010	10/26/2010	10/27/2010	10/28/2010	10/29/2010	10/30/2010	10/31/2010
GPM	3304	3289	3322	3285	3291	3322	3341	3356	3376	3350	3357	3341	3397	3490	3399	3318	3231	3229	3238	3244	3349	3357	3426	3174	3249	3249	3250	3272	3132	3157	
Date	9/1/2010	9/2/2010	9/3/2010	9/4/2010	9/5/2010	9/6/2010	9/7/2010	9/8/2010	9/9/2010	9/10/2010	9/11/2010	9/12/2010	9/13/2010	9/14/2010	9/15/2010	9/16/2010	9/17/2010	9/18/2010	9/19/2010	9/20/2010	9/21/2010	9/22/2010	9/23/2010	9/24/2010	9/25/2010	9/26/2010	9/27/2010	9/28/2010	9/29/2010	9/30/2010	
GPM	3903	3901	3998	4021	4014	3907	3859	3893	3868	4012	4035	3910	3920	3753	3779	3888	4017	4012	4028	4011	4016	3958	3946	3977	3942	3901	3936	3610	3435	3327	3327
Date	8/1/2010	8/2/2010	8/3/2010	8/4/2010	8/5/2010	8/6/2010	8/7/2010	8/8/2010	8/9/2010	8/10/2010	8/11/2010	8/12/2010	8/13/2010	8/14/2010	8/15/2010	8/16/2010	8/17/2010	8/18/2010	8/19/2010	8/20/2010	8/21/2010	8/22/2010	8/23/2010	8/24/2010	8/25/2010	8/26/2010	8/27/2010	8/28/2010	8/29/2010	8/30/2010	8/31/2010
GPM	3883	3880	3876	3877	3843	3832	3829	3822	3825	3767	3762	3691	3537	3575	3608	3737	3868	3827	3790	3825	3859	3911	3948	3930	3885	3942	3974	3956	3956	3967	3945
Date	7/1/2010	7/2/2010	7/3/2010	7/4/2010	7/5/2010	7/6/2010	7/7/2010	7/8/2010	7/9/2010	7/10/2010	7/11/2010	7/12/2010	7/13/2010	7/14/2010	7/15/2010	7/16/2010	7/17/2010	7/18/2010	7/19/2010	7/20/2010	7/21/2010	7/22/2010	7/23/2010	7/24/2010	7/25/2010	7/26/2010	7/27/2010	7/28/2010	7/29/2010	7/30/2010	7/31/2010

Page 2 of 3

gpm

gpm AVERAGE: 3074 gpm AVERAGE: 2779

gpm AVERAGE: 3304

gpm AVERAGE: 3303

gpm AVERAGE: 3874

3836

AVERAGE:

TABLE 2
DAILY WATER PRODUCTION SUMMARY

																			1												
GPM	3254	3185	3184	3312	3454	3493	3495	3483	3488	3480	3475	3371	3269	3427	3434	3405	3468	3459	3447	3444	3453	3437	3424	3423	3417	3406	3404	3411			
Date	2/1/2011	2/2/2011	2/3/2011	2/4/2011	2/5/2011	2/6/2011	2/7/2011	2/8/2011	2/9/2011	2/10/2011	2/11/2011	2/12/2011	2/13/2011	2/14/2011	2/15/2011	2/16/2011	2/17/2011	2/18/2011	2/19/2011	2/20/2011	2/21/2011	2/22/2011	2/23/2011	2/24/2011	2/25/2011	2/26/2011	2/27/2011	2/28/2011			
GPM	2623	2504	2614	2687	2610	3049	2927	2664	2634	2633	2667	2652	2638	2636	2688	2675	2610	2816	2609	2794	2775	2774	2769	2787	2865	3174	3330	3306	3283	3326	3285
Date	1/1/2011	1/2/2011	1/3/2011	1/4/2011	1/5/2011	1/6/2011	1/7/2011	1/8/2011	1/9/2011	1/10/2011	1/11/2011	1/12/2011	1/13/2011	1/14/2011	1/15/2011	1/16/2011	1/17/2011	1/18/2011	1/19/5011	1/20/2011	1/21/2011	1/22/2011	1/23/2011	1/24/2011	1/25/2011	1/26/2011	1/27/2011	1/28/2011	1/29/2011	1/30/2011	1/31/2011

AVERAGE: 2819 gpm AVERAGE: 3407 gpm gpm















