

ADEQ

ARKANSAS
Department of Environmental Quality

MEMORANDUM OF REVIEW
Reimbursement Request
Petroleum Storage Tank Trust Fund

From: Regulated Storage Tank Division Staff

Date: April 26, 2011

Subject: **Downen Oil Company**
4910 Asher Avenue
Little Rock, Arkansas 72204
ID #60000284 LUST #60-0258 AFIN #60-02714

A request for reimbursement (#26) for costs incurred during remediation of a UST site was received from the responsible party (RP) on March 23, 2011. The RP of this site reported a gasoline release on September 11, 1997 (#60-0258). The name and address of the responsible party are:

Downen Oil Company
Attn: Leon Downen
4910 Asher Ave.
Little Rock, AR 72204

The time covered by the applications is June 26, 2010 through February 4, 2011. The activities for which reimbursement is being requested include: post-MDPE groundwater gauging events #7-8; preparation and submittal of a Free Product Recovery Reports #7-8; preparation and submittal of a 2nd Addendum for Free Product Recovery Work Plan; and preparation and submittal of previous reimbursement application.

A Work Plan and Cost Estimate for Additional Free Product Recovery involving surfactant flush/MDPE was approved on December 12, 2008 in the amount of \$89,685.00. On July 16, 2009, RST Technical approved an Updated Cost Estimate and Work Plan for Free Product Recovery in the amount of \$289,693.00. On June 8, 2010, an Addendum for Free Product Recovery Work Plan was approved in the amount of \$27,257.00. On November 2, 2010, a 2nd Addendum for Free Product Recovery Work Plan was approved in the amount of \$120,300.50.

The current application contains three (3) invoices from Pollution Management, Inc. (PMI) totaling **\$87,975.94**. Included in the invoice are charges from Eco Vac Services (\$48,000.00) and ASI (\$13,909.20).

The consultant and the RST Case Manager have each prepared a summary of activities. (See attachments)

STAFF RECOMMENDATION:

The claimed cost of **\$87,975.94** was checked against documentation provided. We have attached copies of the Cost Summary Sheets and all recap sheets provided by the claimant are attached. The certification forms have been provided by the claimant.

The staff recommends payment as follows:

Claim filed - Form TF-1	\$87,975.94
Less Adjustments	- 0.00
Amount Recommended for Payment	<u>\$87,975.94</u>

It is recommended that the claims made by the RP be considered for payment in the combined amount of **\$87,975.94**.

CERTIFICATION

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 is, to the best of my knowledge and belief, true, accurate and complete. I also certify that the amounts claimed for reimbursement under this application have been paid in full. I further certify that I have the authority to submit this application on behalf of Downen Oil Company.

Leon Downen
(Print or type) Leon Downen
(Sign)

STATE OF ARKANSAS)
COUNTY OF Pulaski)^{SS}

Subscribed and sworn to before me this 9th day of March
2011.

Melissa Duncan
Notary Public

My Commission Expires:
Oct 26, 2016

Down-2266

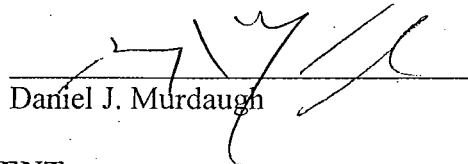


AFFIDAVIT

My name is Daniel J. Murdaugh. I am of majority age, of sound mind, and I am fully competent to make this affidavit. I have personal knowledge of the facts set out herein, all of which are true and correct.

I serve as a Principal of Pollution Management, Inc. ("PMI") and have supervised the preparation of all invoices sent to Downen Oil Company. As of this date, Downen Oil Company has satisfied all of its obligations for payment to PMI.

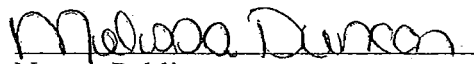
Dated this 17th day of March, 2011


Daniel J. Murdaugh

ACKNOWLEDGMENT

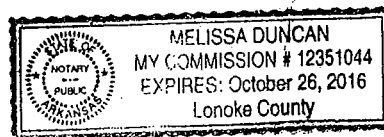
STATE OF ARKANSAS)
COUNTY OF Pulaski SS

SUBSCRIBED AND SWORN to before me, a Notary Public, on this 17th day of March, 2011


Notary Public

My Commission Expires:

Oct 26, 2016



Contractor: Pollution Management, Inc.

Facility ID#: 60000284

RA Log #:

Dates current costs incurred: 6/26/10 to 2/4/11

Request Date: 3/3/2011

COST SUMMARY

1. DIRECT PERSONNEL COST		Hours	Actual Cost	Totals
Principal/Managerial		2.50	137.50	
Professional/Technical		128.50	2,851.57	
Support		12.50	223.55	
DIRECT PERSONNEL COST TOTAL:		143.50		\$3,212.62 ✓
2. INDIRECT COSTS		Base	Rate	Actual Cost
Indirect Personnel		3,212.62	0.26	835.28
G & A Costs		3,212.62	1.26	4,047.90
INDIRECT COSTS TOTAL:		1.52		\$4,883.18 ✓
3. OTHER DIRECT COSTS		Actual Cost		
Equipment Rental		3,240.58		✓
Materials/Supplies		0.00		✓
Travel & Per Diem		67.70		✓
Laboratory		0.00		✓
Subcontracts		61,909.20		✓
Other		0.00		✓
OTHER DIRECT COSTS TOTAL:				\$65,217.48 ✓
4. TOTAL ACTUAL COSTS				\$73,313.28 ✓
5. PROFIT TO CONSULTANT/CONTRACTOR		20%		\$14,662.66 ✓
6. TOTAL CLAIM AMOUNT				\$87,975.94 ✓
A. Total Contract Billing to Date Including Above:		1,070,821.56	+	\$1,070,821.56
B. Amount Deductible:		15,000.00	-	(\$15,000.00)
C. Amount Previously Retained/Disallowed by RST:		10,539.05	-	(\$10,539.05)
D. Amount Previously Received:	004	957,306.57	-	(\$957,306.57)
E. Amount of this Request:		87,975.94	+	\$87,975.94

Interim Request No.	26	Attachment 1
Contractor:	Pollution Management, Inc.	
Facility ID#:	60000284	RA Log #:
Dates current costs incurred:	6/26/10 to 2/4/11	Request Date: 3/3/2011

Direct Personnel Cost Recap

Invoice #16758

Name	Title	Hours	Rate	Total
Danny Murdaugh	Principal	1.00	55.00	55.00
Subtotal Principal/Managerial:		1.00		\$55.00
Danny Murdaugh	Prof. Geologist	4.00	55.00	220.00
Jason Ryan	Field Engineer	25.00	26.44	661.00
Matthew E. McCurdy	Field Technician	5.00	16.84	84.20
Subtotal Professional/Technical:		34.00		\$965.20
David P. Gorman	CADD/Draftsman	2.00	19.31	38.62
Sam D. Newton	CADD/Draftsman	2.50	19.25	48.14
Terri L. Hunt	Clerical	3.50	17.55	61.43
Phyllis J.(Susie) Sexson	Clerical	3.00	16.34	49.03
Subtotal Support:		11.00		\$197.22
Total Personnel Cost - Invoice # 16758		46.00		\$1,217.42

Invoice # 17119

Name	Title	Hours	Rate	Total
Danny Murdaugh	Principal	1.00	55.00	55.00
Subtotal Principal/Managerial:		1.00		\$55.00
Danny Murdaugh	Prof. Geologist	1.00	55.00	55.00
Jason Ryan	Field Engineer	11.00	26.44	290.84
Matthew E. McCurdy	Field Technician	6.00	16.84	101.04
Patrick F. Gunter	Construction	49.50	16.00	792.00
Chris J. Heil	Construction	6.50	23.94	155.61
Michael W. Carter	Construction	2.50	18.00	45.00
Subtotal Professional/Technical:		76.50		\$1,439.49
Total Personnel Cost - Invoice # 17119		77.50		\$1,494.49

Invoice # 17310

Name	Title	Hours	Rate	Total
Danny Murdaugh	Principal	0.50	55.00	27.50
Subtotal Principal/Managerial:		0.50		\$27.50
Danny Murdaugh	Prof. Geologist	1.00	55.00	55.00
Jason Ryan	Field Engineer	11.00	26.44	290.84
Matthew E. McCurdy	Field Technician	6.00	16.84	101.04
Subtotal Professional/Technical:		18.00		\$446.88
Terri L. Hunt	Clerical	1.50	17.55	26.33
Subtotal Support:		1.50		\$26.33
Total Personnel Cost - Invoice # 17310		20.00		\$500.71
Total Personnel Recap - App # 26		143.50		\$3,212.62

Interim Request No.	26	Attachment 3
Contractor:	Pollution Management, Inc.	
Facility ID#:	60000284	RA Log #:
Dates current costs incurred:	6/26/10 to 2/4/11	Request Date: 03/03/11

OTHER COST RECAP

Equipment Rental:

	Date	Invoice #	Vendor	Amount
Invoice #17119			GeoTech Environmental Equip	
	12/21/2010	337992	Interface Probe	\$90.58
			PMI Company-owned Equipment	
	12/13/2010		Dominator 2.5 @ 75.00 per hr	\$187.50
	12/7/2010		Peterbilt 10.50 hrs @ 50.00 per hr	\$525.00
	12/8/2010		Peterbilt 10.50 hrs @ 50.00 per hr	\$525.00
	12/9/2010		Peterbilt 11.50 hrs @ 50.00 per hr	\$575.00
	12/10/2010		Peterbilt 12.50 hrs @ 50.00 per hr	\$625.00
	12/14/2010		Peterbilt 4.50 hrs @ 50.00 per hr	\$225.00
	12/6/2010		Dominator 5 @ 75.00 per hr	\$375.00
	12/7/2010		Dominator 1.5 @ 75.00 per hr	\$112.50
Total Equipment Rental:				\$3,240.58

Travel & Per Diem:

	Date	Invoice #	Vendor	Amount
Invoice #16758			PMI Employee-owned Vehicles	
	9/15/2010	mileage	'25 miles @ \$.50 per mile	\$12.50
	12/16/2010	mileage	'20 miles @ \$.50 per mile	\$10.00
	12/16/2010	mileage	'20 miles @ \$.50 per mile	\$10.00
	12/16/2010	mileage	'20 miles @ \$.50 per mile	\$10.00
Invoice #17310	1/27/2011	mileage	'20 miles @ \$.51 per mile	\$10.20
			PMI Company-owned Vehicles	
Invoice #16758	7/16/2010	mileage	'10 miles @ \$.50 per mile	\$5.00
	12/1/2010	mileage	'20 miles @ \$.50 per mile	\$10.00
Total Travel & Per Diem				\$67.70

Subcontracts:

	Date	Invoice #	Vendor	Amount
Invoice #17119			ASI	
	12/16/2010	LR9927-IN	Disposal - Lq 38,312 gals @ .35 per gal	\$13,409.20
			Drop charge	\$500.00
			EcoVac Services	
	12/16/2010	OK-0202	SURFAC Remediation	\$48,000.00
Total Subcontracts:				\$61,909.20

Total Other Direct Cost Recap :				\$65,217.48
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Pollution Management, Inc.

3512 S. Shackelford Rd
 Little Rock, AR 72205-
 Tel: 501-221-7122 Fax: 501-221-7775

Downen Oil
 4912 Asher Avenue
 Little Rock, AR 72204

Leon Downen

Contract: DOWN-2266:
 TF - Groundwater Remediation

Invoice Number: 16758
Date: 11/15/10
Billing Manager: Daniel J. Murdaugh
Client ID: DOWN

TF - Downen Oil
 Groundwater Remediation
 4910 Asher Avenue
 Little Rock, Arkansas
 Facility ID: 60000284
 Lust #: 60-0258

Labor

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
Daniel J. Murdaugh					
Review Project Data	Task 7 - Review FPR Data	7/12/10	0.50	\$55.00	\$27.50
Prepare Data/Work on Data	Task 7 - Prepare FPR Report	7/29/10	1.00	\$55.00	\$55.00
Prepare Data/Work on Data	Prepare TF Data	8/3/10	0.50	\$55.00	\$27.50
Prepare Data/Work on Data	Prepare TF Data	9/1/10	1.00	\$55.00	\$55.00
Prepare Data/Work on Data	Prepare TF Data	9/10/10	0.50	\$55.00	\$27.50
Work on Project Data	Task 1 - FPRWP Addendum #2	9/16/10	0.50	\$55.00	\$27.50
Prepare Data/Work on Data	Task 1 - FPR Addendum	9/20/10	0.50	\$55.00	\$27.50
Prepare Data/Work on Data	Task 1 - Prepare FPR Addendum	9/21/10	0.50	\$55.00	\$27.50
	Employee Subtotal		5.00		275.00
David P. Gorman					
Drafting		9/2/10	2.00	\$19.31	\$38.62
	Employee Subtotal		2.00		38.62
Jason A. Ryan					
Prepare Data/Work on Data	Task 7 Prepare MDPE Report	7/8/10	2.00	\$26.44	\$52.88
Prepare Data/Work on Data	Task 7 Prepare Free Product Recovery Report	7/15/10	1.00	\$26.44	\$26.44
Prepare Data/Work on Data	Task 7 Prepare Free Product Recovery Report	7/16/10	2.00	\$26.44	\$52.88
Prepare Data/Work on Data	Task 7 Prepare Free Product Recovery Report	7/27/10	5.00	\$26.44	\$132.20
Prepare Data/Work on Data	Task 7 Prepare Free Product Recovery Report	7/28/10	4.00	\$26.44	\$105.76
Prepare Status Report	Prepare Status Report	9/1/10	2.00	\$26.44	\$52.88
Professional/Technical Service	Task 1 - Prepare for and Attend Scoping Meeting at ADEQ	9/8/10	3.00	\$26.44	\$79.32
Prepare Data/Work on Data	Task 8 Prepare 2nd CAP Addendum	9/15/10	3.00	\$26.44	\$79.32
Prepare Data/Work on Data	Task 1 Prepare and Respond to Comments by ADEQ for the 2nd CAP Addendum	10/7/10	2.00	\$26.44	\$52.88
Review Project Data	Review TF Application - Prepare for Committee Meeting	10/26/10	1.00	\$26.44	\$26.44
	Employee Subtotal		25.00		661.00

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 TF - Groundwater Remediation

TF - Downen Oil
 Groundwater Remediation
 4910 Asher Avenue
 Little Rock, Arkansas
 Facility ID: 60000284
 Lust #: 60-0258

Employee/Activity	Date	Units	Rate	Amount	
Matthew E. McCurdy					
MDPE Operations	Task 7. Gauged all wells.	7/16/10	5.00	\$16.84	\$84.20
	Employee Subtotal		5.00		84.20
Phyllis J. Sexson					
Prepare Reimbursement App	App#25	8/6/10	0.50	\$16.34	\$8.17
Prepare Reimbursement App	App#25	8/11/10	0.75	\$16.34	\$12.26
Prepare Reimbursement App	App#25	9/3/10	0.75	\$16.34	\$12.26
Prepare Reimbursement App	App#25	9/8/10	0.50	\$16.34	\$8.17
Prepare Reimbursement App	App#25	9/10/10	0.50	\$16.34	\$8.17
	Employee Subtotal		3.00		49.03
Samuel D. Newton					
Drafting	Drafting	8/26/10	0.50	\$19.25	\$9.63
Drafting	Drafting	8/27/10	0.50	\$19.25	\$9.63
Drafting	Drafting	8/31/10	1.50	\$19.25	\$28.88
	Employee Subtotal		2.50		48.14
Terri L. Hunt					
Document Preparation	Task 7 - Free Product Removal Report	7/29/10	2.00	\$17.55	\$35.10
Document Preparation	Task 1 - 2nd Addendum to Free Product Recovery Work Plan	9/20/10	1.00	\$17.55	\$17.55
Document Preparation	Task 1 - 2nd Addendum to Free Product Recovery Work Plan	9/21/10	0.50	\$17.55	\$8.78
	Employee Subtotal		3.50		61.43
	Labor Subtotal		46.00		1,217.42
				Overhead	1,850.46
				Direct Labor Total:	3,067.88
Reimbursable					
Jason Ryan					
Mileage to/from Job Site	091510JR	9/15/10	25.00	0.50	12.50
9/8/10 Mileage					
	Reimbursable Subtotal				12.50
PMI Equip					
Matthew E. McCurdy					
07 Chev 1500 SN641206		7/16/10	10.00	0.50	5.00
	PMI Equip Subtotal				5.00
	Item Subtotal				3,085.38

Downen Oil
4912 Asher Avenue
Little Rock, AR 72204

Invoice Number: 16758
Date: 11/15/10
Billing Manager: Daniel J. Murdaugh
Client ID: DOWN

Leon Downen

Contract: DOWN-2266:
TF - Groundwater Remediation

TF - Downen Oil
Groundwater Remediation
4910 Asher Avenue
Little Rock, Arkansas
Facility ID: 60000284
Lust #: 60-0258

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
				617.08
				Profit
				Amount Due This Invoice
				\$3,702.46

This invoice is due upon receipt

Pollution Management, Inc.

3512 S. Shackleford Rd

Little Rock, AR 72205-

Tel: 501-221-7122 Fax: 501-221-7775

Leon Downen
Downen Oil
4912 Asher Avenue
Little Rock, AR 72204

Invoice Number: 17119
Date: 1/24/11

Billing Manager: Daniel J. Murdaugh
Client ID: DOWN

Contract: DOWN-2266:
TF - Groundwater Remediation

TF - Downen Oil
Groundwater Remediation
4910 Asher Avenue
Little Rock, Arkansas
Facility ID: 60000284
Inst #: 60-0258

Labor

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
Chris J. Hell					
Field Services	Task 8 - Transport/Disposal	12/6/10	5.00	\$23.94	\$119.70
Field Services	Task 8 - Transport/Disposal	12/7/10	1.50	\$23.94	\$35.91
	Employee Subtotal		6.50		155.61
Daniel J. Murdaugh					
Coordinate Site Operations	Task 8 - Review ADEQ Corr/Coord FPR	11/2/10	0.50	\$55.00	\$27.50
Coordinate Site Operations	Task 8 - Coord FPR Oper	11/11/10	0.50	\$55.00	\$27.50
Coordinate Site Operations	Task 8 - Coord FPR Oper	11/30/10	0.50	\$55.00	\$27.50
Review Project Data	Task 8 - Review FPR Data	1/4/11	0.50	\$55.00	\$27.50
	Employee Subtotal		2.00		110.00
Jason A. Ryan					
Professional/Technical Service	Task 8 Perform Free Product Recovery Operations	12/6/10	3.00	\$26.44	\$79.32
Professional/Technical Service	Task 8 Perform Free Product Recovery Operations	12/7/10	2.00	\$26.44	\$52.88
Professional/Technical Service	Task 8 Perform Free Product Recovery Operations	12/8/10	5.00	\$26.44	\$132.20
Prepare Data/Work on Data	Task 8 Prepare 2nd Addendum Report	1/4/11	1.00	\$26.44	\$26.44
	Employee Subtotal		11.00		290.84
Matthew E. McCurdy					
Field Services	Task 8 - Gauged all monitoring wells.	12/1/10	6.00	\$16.84	\$101.04
	Employee Subtotal		6.00		101.04
Michael W. Carter					
Field Services	Task 8 - Transport & Disposal	12/13/10	2.50	\$18.00	\$45.00
	Employee Subtotal		2.50		45.00

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 TF - Groundwater Remediation

Patrick F. Gunter

Field Services	Task 8 - Transport/Disposal	12/7/10	10.50	\$16.00	\$168.00
Field Services	Task 8 - Transport/Disposal	12/8/10	10.50	\$16.00	\$168.00
Field Services	Task 8 - Transport/Disposal	12/9/10	11.50	\$16.00	\$184.00
Field Services	Task 8 - Transport/Disposal	12/10/10	12.50	\$16.00	\$200.00
Field Services	Task 8 - Transport/Disposal	12/14/10	4.50	\$16.00	\$72.00
	Employee Subtotal		49.50		792.00
	Labor Subtotal		77.50		1,494.49
				Overhead	2,271.62
				Direct Labor Total:	3,766.11

Reimbursable

ASI

Waste Disposal - Liquid 12/6/10. 2,720 G Pst	LR9927-IN	12/16/10	2,720.00	0.35	952.00
Waste Disposal - Liquid 12/6/10. Drop Charge	LR9927-IN	12/16/10	1.00	50.00	50.00
Waste Disposal - Liquid 12/7/10. 4,808 G. Pst	LR9927-IN	12/16/10	4,808.00	0.35	1,682.80
Waste Disposal - Liquid Drop Charge	LR9927-IN	12/16/10	1.00	50.00	50.00
Waste Disposal - Liquid 12/7/10. 1,025 G Pst	LR9927-IN	12/16/10	1,025.00	0.35	358.75
Waste Disposal - Liquid 12/7/10. Drop Charge	LR9927-IN	12/16/10	1.00	50.00	50.00
Waste Disposal - Liquid 12/8/10. 3,560 G Pst	LR9927-IN	12/16/10	3,560.00	0.35	1,246.00
Waste Disposal - Liquid 12/8/10. Drop Charge	LR9927-IN	12/16/10	1.00	50.00	50.00
Waste Disposal - Liquid 12/9/10. 6,124 G. Pst	LR9927-IN	12/16/10	6,124.00	0.35	2,143.40
Waste Disposal - Liquid 12/9/10. Drop Charge	LR9927-IN	12/16/10	1.00	50.00	50.00
Waste Disposal - Liquid 12/9/10. 5,674 G. Pst	LR9927-IN	12/16/10	5,674.00	0.35	1,985.90
Waste Disposal - Liquid 12/9/10. Drop Charge	LR9927-IN	12/16/10	1.00	50.00	50.00
Waste Disposal - Liquid 12/10/10. 6,173 G. Pst	LR9927-IN	12/16/10	6,173.00	0.35	2,160.55
Waste Disposal - Liquid 12/10/10. Drop Charge	LR9927-IN	12/16/10	1.00	50.00	50.00

Leon Downen
 Downen Oil
 4912 Asher Avenue
 Little Rock, AR 72204

Invoice Number: 17119
 Date: 1/24/11

Billing Manager: Daniel J. Murdaugh
 Client ID: DOWN

Contract: DOWN-2266:
 TF - Groundwater Remediation

ASI						
Waste Disposal - Liquid	LR9927-IN	12/16/10	5,061.00	0.35	1,771.35	
12/10/10. 5,061 G. Pst						
Waste Disposal - Liquid	LR9927-IN	12/16/10	1.00	50.00	50.00	
12/10/10. Drop Charge						
Waste Disposal - Liquid	LR9927-IN	12/16/10	2,667.00	0.35	933.45	
12/13/10. 2,667 G. Pst						
Waste Disposal - Liquid	LR9927-IN	12/16/10	1.00	50.00	50.00	
12/13/10. Drop Charge						
Waste Disposal - Liquid	LR9927-IN	12/16/10	500.00	0.35	175.00	
12/14/10. 500 G. Pst						
Waste Disposal - Liquid	LR9927-IN	12/16/10	1.00	50.00	50.00	
12/14/10. Drop Charge						
Eco Vac Services, Inc.						
Subcontractor	OK-0202	12/16/10	1.00	48,000.00	48,000.00	
Surfac Remediation						
Geotech Environmental Equip.						
Equipment Rental	337992	12/21/10	1.00	90.58	90.58	
Interface Probe (11/29-12/13/10)						
Jason Ryan						
Mileage to/from Job Site	121610JR	12/7/10	20.00	0.50	10.00	
Mileage to/from Job Site	121610JR	12/7/10	20.00	0.50	10.00	
Mileage to/from Job Site	121610JR	12/8/10	20.00	0.50	10.00	
					<u>62,029.78</u>	
Reimbursable Subtotal						
PMI Equip						
Michael W. Carter						
Dominator		12/13/10	2.50	75.00	187.50	
Patrick F. Gunter						
08 Peterbilt SN755669		12/7/10	10.50	50.00	525.00	
08 Peterbilt SN755669		12/8/10	10.50	50.00	525.00	
08 Peterbilt SN755669		12/9/10	11.50	50.00	575.00	
08 Peterbilt SN755669		12/10/10	12.50	50.00	625.00	
08 Peterbilt SN755669		12/14/10	4.50	50.00	225.00	
Chris J. Heil						
Dominator		12/6/10	5.00	75.00	375.00	
Dominator		12/7/10	1.50	75.00	112.50	
Matthew E. McCurdy						
07 Chev 1500 SN641206		12/1/10	20.00	0.50	10.00	
					<u>3,160.00</u>	
PMI Equip Subtotal						
					<u>68,955.89</u>	
					<u>13,791.18</u>	
						Profit
Amount Due This Invoice						\$82,747.07

This invoice is due upon receipt

Pollution Management, Inc.

3512 S. Shackleford Rd
 Little Rock, AR 72205-
 Tel: 501-221-7122 Fax: 501-221-7775

Downen Oil
 4912 Asher Avenue
 Little Rock, AR 72204

Invoice Number: 17310
Date: 2/25/11
Billing Manager: Daniel J. Murdaugh
Client ID: DOWN

Leon Downen

Contract: DOWN-2266:
 TF - Groundwater Remediation

TF - Downen Oil
 Groundwater Remediation
 4910 Asher Avenue
 Little Rock, Arkansas
 Facility ID: 60000284
 Lust #: 60-0258

Labor

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>	
Daniel J. Murdaugh					
Review Project Data	Task 8 - Review Data/Work on Report	2/2/11	0.50	\$55.00	\$27.50
Prepare Data/Work on Data	Task 8 - Prepare FPR Report	2/4/11	1.00	\$55.00	\$55.00
	Employee Subtotal		1.50		82.50
Jason A. Ryan					
Prepare Data/Work on Data	Task 8 Prepare Free Product Removal Report	2/1/11	3.00	\$26.44	\$79.32
Prepare Data/Work on Data	Task 8 Prepare Free Product Removal Report	2/2/11	3.00	\$26.44	\$79.32
Prepare Data/Work on Data	Task 8 Prepare Free Product Removal Report	2/3/11	5.00	\$26.44	\$132.20
	Employee Subtotal		11.00		290.84
Matthew E. McCurdy					
Field Services	Task 8 - Gauged all MW's	1/27/11	6.00	\$16.84	\$101.04
	Employee Subtotal		6.00		101.04
Terri L. Hunt					
Document Preparation	Task 8 - Free Product Removal Report	2/4/11	1.50	\$17.55	\$26.33
	Employee Subtotal		1.50		26.33
	Labor Subtotal		20.00		500.71
				Overhead	761.10
				Direct Labor Total:	1,261.81

PMI Equip

Matthew E. McCurdy					
07 Chev 1500 SN641206		1/27/11	20.00	0.51	10.20
	PMI Equip Subtotal				10.20
	Item Subtotal				1,272.01
	Profit				254.40

Downen Oil
4912 Asher Avenue
Little Rock, AR 72204

Leon Downen

Contract: DOWN-2266:
TF - Groundwater Remediation

Invoice Number: 17310

Date: 2/25/11

Billing Manager: Daniel J. Murdaugh

Client ID: DOWN

TF - Downen Oil
Groundwater Remediation
4910 Asher Avenue
Little Rock, Arkansas
Facility ID: 60000284
Lust #: 60-0258

<u>Employee/Activity</u>	<u>Date</u>	<u>Units</u>	<u>Rate</u>	<u>Amount</u>
				Amount Due This Invoice
				\$1,526.41

This invoice is due upon receipt

ADEQ

A R K A N S A S
Department of Environmental Quality

MEMORANDUM

Timisa

To: Wanda Paes, Trust Fund Manager
Regulated Storage Tank Division

Through: Daniel Clanton, Engineer Supervisor *D 3/24/11*
Technical Branch

From: Rodger Payne, P.E. *RP*
Technical Branch

Date: March 24, 2011

Subject: Trust Fund Reimbursement Request #26
Downen Oil Co.
Little Rock, AR
ID #60000284 LUST #60-0258 AFIN #60-02714

The consultant has furnished a summary of the work which reflects my understanding of the case development and status, including an appropriate map and tabular results. The time period covered by the above referenced application is from *June 26, 2010 through January 4, 2011.*

February

Case Status

Following an extensive period of MDPE events, sampling, analysis, and reporting, ADEQ requested a work plan for additional free product recovery on 01/12/07. The consultant prepared a preliminary cost estimate for potential use of MDPE in conjunction with surfactant flushing and limited excavation of some shallow contaminated soils at the site. The proposal was submitted to ADEQ on 02/12/07. Following a review of the proposal and a re-evaluation of the available soil boring data and groundwater monitoring data at the site, ADEQ concluded it would be more appropriate to gather additional site data in the area beneath the canopy to fill in data gaps before proceeding with additional free product recovery efforts. ADEQ requested a work plan for Additional Site Assessment (ASA) on 05/08/07. The consultant submitted the work plan for ASA on 06/22/07 and ADEQ approved it on 08/22/07. The plan called for an additional thirteen (13) soil borings and an additional six (6) groundwater monitoring wells at the site. Field work under the plan was implemented in September/October 2007 and the ASA Report was submitted to ADEQ on 01/14/08. The ASA Report indicated two free product plumes at the site.

On 04/04/08 ADEQ and PMI held a scoping meeting. ADEQ requested an updated work plan for MDPE/Surfactant Flush for free product (FP) removal in view of the ASA. ADEQ received a revised cost estimate for MDPE/Surfactant flush on 07/29/08 and approved the FP Removal

Plan with the revised costs on 12/12/08. In accordance with the approved FP Removal Work Plan, three sets of MDPE pilot tests were performed beginning in February 2009 through the first week of August 2009 by the subcontractor for the work, EcoVac Services, Inc. Each pilot test set consisted of five test events over five subsequent days.

Prognosis

The first set of pilot tests (02/23/09 – 02/27/09) lowered the maximum FP level from 3.20' to 1.34'. The second set of pilot tests (06/15/09 – 06/19/09) lowered the maximum FP level from 0.72' to 0.34'. For the he third set of pilot tests (08/03/09 – 08/07/09), eight wells with zero free product before the set was initiated showed no change, nine wells showed an increase (up to a maximum recorded level of 0.42'), while four wells showed a slight decrease. Following the third set of tests, three of the 21 wells exceeded the recommended maximum of 0.3'. The exceedances were 0.42', 0.40', and 0.34'. Following a review of the data from the third set of pilot tests, EcoVac Services, Inc. decided results were close enough to the recommended level to proceed with Surfactant Flush. MDPE/Surfactant Flush was implemented between August 10 and August 14, 2009. Excellent results were achieved. The post Surfactant Flush monitoring on 08/28/09 indicated 20 of 21 wells with no free product. One well (EW-7) had 0.05' of FP. A Free Product Removal Report was submitted on 10-07-09 with the results of the field work.

The Technical Branch of the RST Division gauged selected monitoring wells on 01-13-10. Of the fourteen wells gauged, four exhibited LNAPL ranging from 0.016' (EW-21) to 0.21' (EW-8). ADEQ met with PMI on 03-18-10 to discuss additional LNAPL removal. It was agreed that PMI would submit an addendum to the Free Product Recovery Work Plan calling for three additional MDPE events and pre and post-MDPE monitoring well gauging. ADEQ approved the addendum on 06-08-10 and the work was implemented by PMI in June and July 2010. The three additional MDPE events reduced the maximum LNAPL level from 1.68' (PMI-6) to 0.20' (EW-8). Ten of forty wells gauged exhibited LNAPL for the pre-MDPE gauging event while eight of forty for the post-MDPE gauging event.

ADEQ met with PMI on 09-08-10 to discuss potential additional LNAPL removal actions. It was agreed that a targeted excavation in the area with the highest LNAPL levels (around EW-8 and PMI-6) might not be practicable due to a congestion of utility lines and relatively high groundwater. ADEQ sent out a letter on 09-16-10 requesting a cost estimate (2nd Amendment to Work Plan for LNAPL Removal) for additional LNAPL removal by surfactant flush followed by MDPE polishing events as used previously to good effect. The cost estimate was submitted on 09-22-10 and approved by ADEQ on 11-02-10. Free product removal operations were conducted by Eco Vac from 12-06-10 thru 12-13-10. Of the 41 monitoring wells gauged prior to the December 2010 free product removal operations, 12 had measurable LNAPL up to a maximum of 0.28 feet. The same 41 monitoring wells were gauged on 01/27/11 (six weeks after free product removal operations were concluded) and no LNAPL was measured in any of the wells. With no free product remaining, the case is a candidate for closure.

Cost Analysis

This application covers the time period from 06/26/10 until 02/04/11. The work for which reimbursement is being sought includes:

- A post-MDPE groundwater monitoring well gauging event at the site on 07-16-10.
- Preparation and submittal of a Free Product Removal report to ADEQ on 07-29-10.
- Scoping meeting at ADEQ on 09-08-10 to discuss potential future actions at the site. It was agreed in the meeting that the most practicable action would be additional surfactant flush followed by MDPE polishing events to capture residual hydrocarbons at the site.
- Preparation and submittal of cost estimate (2nd Amendment to Work Plan for LNAPL Removal) for additional surfactant flush followed by MPDE polishing for free product removal. The cost estimate was received by ADEQ on 09-22-10 and approved on 11-02-10.
- A pre-free product removal groundwater gauging event at the site on 12-01-10.
- Surfactant flush and MPDE polishing events for free product removal at the site from 12-06-10 thru 12-13-10 by subcontractor Eco Vac Services, Inc. (Eco Vac) of Moore, OK. Oversight of free product removal operations by PMI.
- Liquid waste disposal of contaminated groundwater from free product removal operations 12-06-10 thru 12-13-10 at Agricultural Services, Inc. (ASI).
- Preparation and submittal of Trust Fund Application No. 25.

Last Site Visit

The last site visit by members of the Technical Branch was on 12/08/10 to observe free product removal operations that were underway by Eco Vac. Photos were taken and added to the casefile.

Attachments: Site Plan with Monitoring and Extraction Wells, PMI, 10-01-09
Table I – Pre-FP Removal Gauging Data, PMI, 12-01-10
Table II – Post-FP Removal Gauging Data, PMI, 01-27-11

STATUS REPORT

DOWNEN OIL COMPANY, INC.
4910 Asher Avenue
Little Rock, Arkansas 72205
Facility ID # 60000284
LUST #60-258
June 26, 2010 through January 4, 2011

This status report is being provided by Pollution Management, Inc., (PMI) on behalf of Downen Oil Company. This report provides a brief summary of operations related to assessment, monitoring, fuel recovery, and remediation at the facility.

Project Summary

The Downen facility has operated as a retail gasoline facility since the 1940's. During a routine Underground Storage Tank (UST) closure in September 1997, excavation activities discovered the existence of unregistered USTs and a significant amount of gasoline in contact with shallow groundwater. Approximately 930 cubic yards of petroleum-contaminated material was removed from the excavation. Leaking Underground Storage Tank (LUST) file #60-0258 was opened with the RST Technical Branch. The case became Trust Fund eligible in November 1997.

The ADEQ approved multiple rounds of environmental assessments and interim corrective action, including free product recovery efforts, until July 2001. Assessment reports indicated three (3) separate dissolved hydrocarbon plumes from various UST basins. Approximately 1,300 equivalent gallons of gasoline were removed via Mobile Dual Phase Extraction (MDPE) events conducted during this period. In July 2001, the RST Division requested a revised Corrective Action Plan (CAP)

In November 2001, PMI prepared and submitted a CAP, which called for the installation of additional monitoring/extraction wells to better define the hydrocarbon contamination, abandonment of unusable monitoring wells, monthly MDPE events, and quarterly Groundwater Assessment Monitoring (GAM). The goal of the CAP was to remove free-phase, dissolved-phase, and vapor-phase hydrocarbons in soil and groundwater pursuant to 40 CFR 280.66. The ADEQ approved the CAP for implementation in January 2002.

In February 2002, PMI decommissioned 15 monitoring wells and installed an additional 30 wells for plume delineation and extraction points. The total number of wells existing on-site

currently is 37. The first MDPE event was performed in February 2002. Monthly MDPE events and quarterly GAM events continued until June 2005. The estimated total of vapor equivalent gallons of gasoline removed during this period was approximately 1,720 gallons.

In December 2005, the final GAM event reported 18 monitoring wells containing free product levels ranging between 0.02 of a foot and 1.29 feet. A technical meeting between RST and PMI personnel was held at the ADEQ on January 13, 2006 to discuss future remedial activities at the facility. During follow up correspondence from the RST technical staff on April 28, 2006, PMI was authorized to conduct a groundwater gauging event and to obtain cost related to additional remediation at the project site. PMI submitted the preliminary cost and time frame to the RST case manager in correspondence dated July 5, 2006.

PMI received correspondence from the ADEQ case manager dated January 12, 2007 requesting a free product recovery work plan. PMI prepared and submitted the work plan to the ADEQ on February 12, 2007. The work plan stipulated the performance of five (5) consecutive days of 8 hours MDPE events followed by seven (7) consecutive daily MDPE surfactant injection capture events to remove the free product at the site. In addition, the work plan proposed a single 8-hour MDPE polishing event to removal any residual free product.

After review of the free product recovery work plan and other available data, the RST case manager requested an additional scoping meeting. The meeting was conducted on April 18, 2007 between PMI personnel and the ADEQ technical staff. During the meeting, the RST case manager stated that the area's underneath the pump island canopy and car wash bays where not assessed. Therefore, these areas would need to be investigated for the presence of free product before approval of the free product recovery work plan.

PMI received correspondence from the ADEQ on May 8, 2007 requesting a work plan and cost estimate to complete the additional assessment at the site. PMI prepared and submitted the additional assessment work plan to the ADEQ on June 22, 2007, which was subsequently approved for implementation on August 22, 2007.

PMI along with Anderson Engineering mobilized equipment and crews to the site on September 5, 2007 to begin the installation of 11 soil borings to evaluate subsurface soil/groundwater conditions underlying the pump island canopy located in the south central portion of the Downen Oil facility. PMI completed the drilling operations on September 7, 2007. Following receipt of soil analytical data, PMI and the RST case manager reviewed the laboratory results in order to determine the placement of select monitoring wells within the area of the pump island bank

and the carwash bays. After the review process was completed, PMI mobilized equipment and crews to the site on October 16 thru 18, 2007 to install six (6) monitoring wells at select boring locations to verify the presence or absence of free product (gasoline) in contact with the shallow aquifer in the area of concern.

After the additional monitoring wells had been properly installed, PMI conducted a groundwater gauging event on all of the existing and new monitoring wells on October 25, 2007. Nineteen (19) monitoring wells displayed measurable amounts of free product gasoline with thicknesses ranging from 0.02 feet in PMI-2 to 1.96 feet in EW-21. Only one (1) of the newly installed monitoring wells (PMI-2) displayed phase separated hydrocarbons. PMI prepared and submitted an additional site assessment report detailing the findings of the investigation to the ADEQ on January 9, 2008.

Based on the findings of the investigation, the ADEQ case manager requested an updated cost estimate for the Free Product Recovery Work Plan in July 2008. PMI prepared and submitted the updated cost estimate to the ADEQ on July 21, 2009. Subsequently, a portion (Task 3) of the Free Product Recovery Work Plan was approved for implementation on December 12, 2008. Task 3 outlined the performance of five (5) MDPE "test" events to remove the majority of the free phase hydrocarbon mass and record field data to aid in determining the costs associated with Task 4 (SURFAC Injection/Capture Events).

PMI and Ecovac personnel mobilized equipment and crews to the site on February 23, 2009 to commence the MDPE events. The events were performed for five (5) consecutive days and each event was eight (8) hours in duration. Approximately 413 gallons of gasoline and 46,772 gallons of petroleum-contaminated groundwater was recovered during the five (5) MDPE events. Following completion of fieldwork activities, Ecovac prepared and submitted a report to PMI detailing the findings of the MDPE events on March 25, 2009. The report stated that a 67% reduction in the free product thickness had been achieved at the site. However eight (8) of the wells displayed thicknesses above 0.3 feet. Therefore, Ecovac recommended the performance of five (5) additional MDPE events to further reduce the free phase hydrocarbon mass before implementing the SURFAC technology. PMI submitted the Ecovac report to the ADEQ on March 27, 2009.

Upon review of the Ecovac report submitted by PMI, the ADEQ requested the submittal of a revised cost estimated to the Free Product Recovery Work Plan to incorporate the additional five (5) MDPE events. PMI prepared and submitted the revised cost estimate to the ADEQ case manager on May 18, 2009, which was subsequently approved for implementation by correspondence dated May 27, 2009. PMI and Ecovac personnel mobilized equipment and crews to the site on June 15, 2009 to

initiate MDPE events six (6) through ten (10). Prior to conducting the MDPE events, PMI personnel gauged the monitoring well network on June 12, 2009 to determine the current fuel thickness measurements and aid in the number/location of wells utilized during the extraction events. The MDPE events were concluded on June 19, 2009. Upon completion of the MDPE events, PMI personnel performed a follow up gauging event of the monitoring well network on July 2, 2009.

Ecovac submitted Report #2 dated July 8, 2009 to PMI and ADEQ. In the report, Ecovac recommended a third (3rd) round of MDPE events (11 through 15) which would focus on ten (10) wells displaying the most significant levels of free product or showed an increase in free product following events 6 through 10. Upon review of the report, the ADEQ issued by email correspondence on July 23, 2009, approval of MDPE Events 11 through 15 and the SURFAC injection/capture events.

On August 3, 2009 PMI and Ecovac mobilized equipment and crews to the site to conduct MDPE events 11 through 15. The events were completed on August 7, 2009 and consisted of five (5) consecutive days of 8-hour MDPE events. Following completion of the MDPE events, PMI and Ecovac mobilized equipment and crews to the site on August 10, 2009 to implement the SURFAC/MDPE injection/capture events. The SURFAC operations were completed on August 14, 2009. Free product thicknesses recorded by PMI following the SURFAC/MDPE injection/capture events on August 28, 2009 revealed a phase separated product reduction from eighteen wells to only a single well, (EW-7), with a value of 0.05 feet which is below the original CAP goal of 0.10 feet. Following completion of the free product recovery operations, PMI prepared and submitted a Free Product Recovery Report to the ADEQ on October 7, 2009.

On February 26, 2010, PMI received email correspondence from the ADEQ case manager reporting measurable free product levels in wells EW-5, EW-7, EW-8, and EW-21 with thicknesses ranging from 0.04 feet in EW-7 to 0.21 feet in EW-8. The groundwater data was gathered by ADEQ staff during a site visit on January 13, 2010. Consequently, PMI and ADEQ staff met on March 18, 2010 to discuss the Downen Oil site. It was agreed during the meeting, that an Addendum to the Free Product Removal Work Plan was warranted. The Addendum was to include three (3) additional MDPE events along with two (2) groundwater gauging events which were to be performed prior to and following the completion of the additional MDPE events.

PMI prepared and submitted the Addendum to the ADEQ on May 19, 2010. ADEQ approval of the Addendum was received from the case manager on June 9, 2010. Subsequently, groundwater gauging was performed on the extraction/monitoring well network on June 23, 2010 prior to commencement of the three (3) additional MDPE events. Free product (gasoline) was detected in ten

(10) wells with thicknesses ranging from 0.06 feet in PMI-2 to 1.68 feet in EW-8. After the initial groundwater gauging event was conducted, PMI performed the three (3) 8-hour MDPE events on June 23, 24, and 25, respectively. During the three (3) events, a total of 1,053.77 pounds of carbon or **180.13 vapor equivalent gallons** of gasoline were recovered.

On July 16, 2010, PMI personnel mobilized to the site to conduct a post MDPE groundwater gauging event. Free product (gasoline) was detected in eight (8) wells with thicknesses ranging from 0.02 feet in EW-6, EW-18, and EW-21 to 0.20 feet in PMI-6. Of the eight (8) wells containing measurable quantities of free product, only one (1) well (PMI-6) exceeded the original CAP goal of 0.10 feet. Following completion of the gauging event, PMI completed and submitted a Free Product Removal Report to the ADEQ on July 29, 2010.

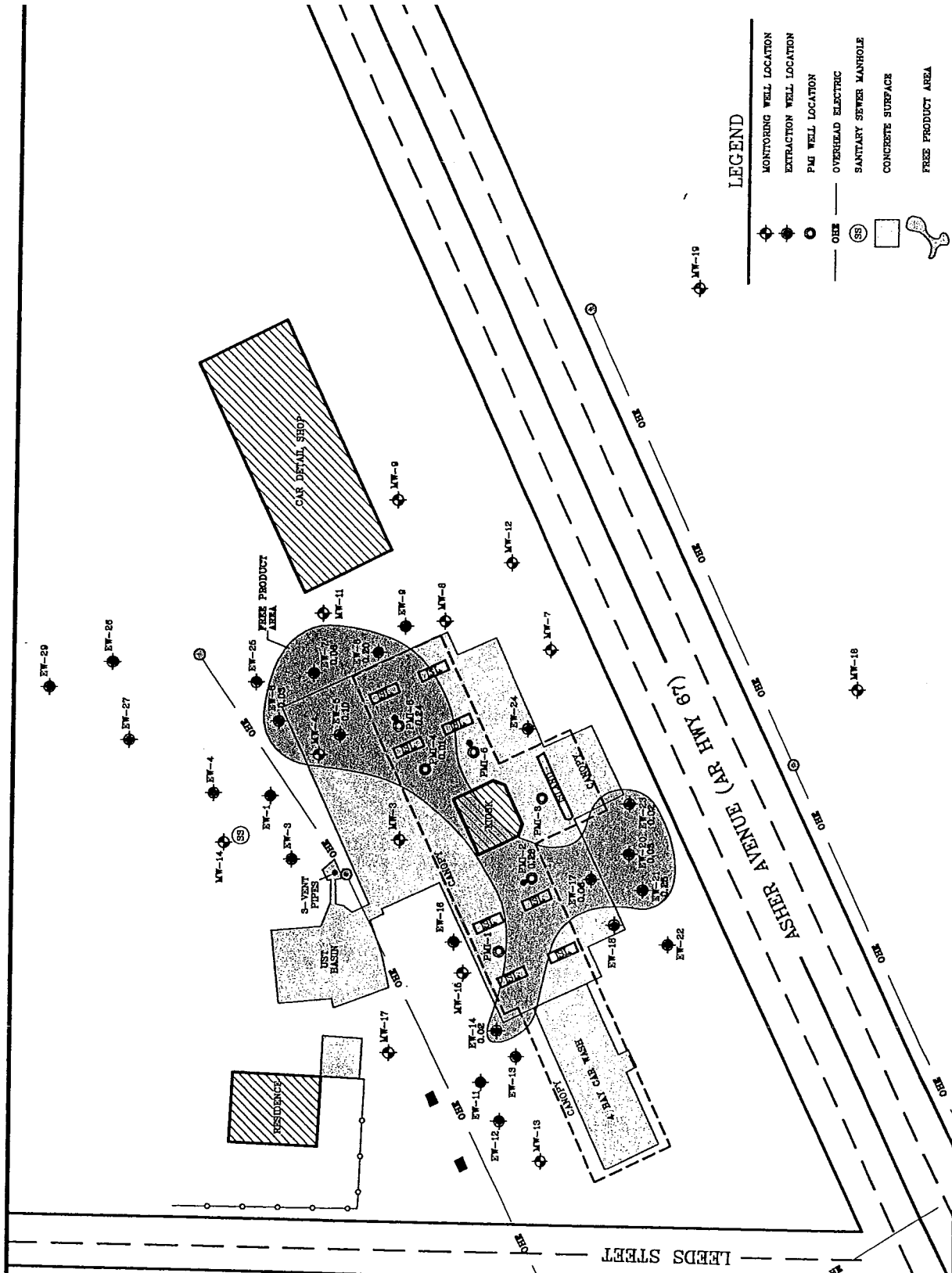
On September 8, 2010, PMI and ADEQ staff conducted a scoping meeting to discuss future remedial activities at the project site. During the meeting, the ADEQ requested the submittal of a Second Addendum to the CAP. PMI completed and submitted the requested addendum to the ADEQ on September 21, 2010. The Addendum stipulated the performance of 10 days of MDPE in conjunction with a surfactant flushing event. After review of the cost addendum, PMI received correspondence from the ADEQ dated November 2, 2010 authorizing the 2nd Addendum for implementation.

A pre-free product removal gauging event was conducted on December 1, 2010. Free product was recorded in 12 wells with thicknesses ranging from 0.28 feet in PMI-2 to 0.01 feet in PMI-4. Free product removal activities approved in the Addendum were conducted from December 6, 2010 through December 13, 2010. Field activities were conducted utilizing vacuum trucks on select monitoring and extraction wells. The selected wells consisted of: MW-8, EW-5, EW-6, EW-7, EW-8, EW-14, EW-17, EW-20, EW-21, EW-22, EW-23, PMI-2, PMI-4, and PMI-6. The wells were selected based on previous and current gauging data, which revealed measureable free product. In addition, injection of a dilute surfactant (4%) into the selected wells was performed to aid the vacuum trucks in removal of the free product. A post surfactant groundwater gauging event was conducted on January 27, 2011. Results of the post surfactant gauging event revealed no measureable free product in the monitoring or extraction networks. Drawing Number 1 presents a Pre-Surfactant Gauging Map. Drawing Number 2 presents a Post Surfactant Gauging Map.

Current Reimbursable Activities

During the current reporting period, PMI completed the following tasks as directed by the RST Technical Division of the ADEQ:

- A groundwater gauging event (Task 7) was conducted on July 16, 2010.
- A Free Product Removal Report (Task 7) was submitted to the ADEQ on July 29, 2010.
- A Scoping Meeting (Task 8) was held with the ADEQ on September 8, 2010.
- A 2nd Addendum (Task 8) to the Original CAP was submitted to the ADEQ on September 21, 2010.
- A groundwater gauging event (Task 8) was conducted on December 1, 2010.
- Free Product Removal (Task 8) was performed from December 6 through 13, 2010.



LEGEND

- ◆ MONITORING WELL LOCATION
- EXTRACTION WELL LOCATION
- PMI WELL LOCATION
- OHE OVERHEAD ELECTRIC
- ⊕ SANITARY SEWER MANHOLE
- CONCRETE SURFACE
- ▨ FREE PRODUCT AREA

FILE NAME	PRE SURFACTANT MAP
JOB NUMBER	DRG. NUMBER
DOWN-2286	1

SCALE	0 20' 40'
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STATUS REPORT
 DOWNER OIL
 4810 BAKER AVENUE
 LITTLE ROCK, ARKANSAS
 FACILITY ID# 6000284 LUST# 60-268

PRE SURFACTANT GAUGING MAP
 DECEMBER 1, 2010

SUBMITTED: I. RYAN
 DRAWN: D. CORLAN
 CHECKED: D. MURDOUGH
 DATE: MAR 10, 2011

POLLUTION MANAGEMENT INC.
 3512 SOUTH SHACKLEFORD
 LITTLE ROCK, ARKANSAS 72205
 (501) 221-7122 fax (501) 221-7775



TABLE I PRE-FP REMOVAL MONITORING WELL GAUGING DATA

Downen Oil Company
 4910 Asher Avenue
 Little Rock, Arkansas
 Facility ID #60000285
 December 1, 2010

Well Number	Well Elevation (top of PVC casing in feet amsl)	Depth to Product (feet below toc)	Depth to Water (feet below top of PVC casing)	Product Thickness (feet)
MW-3	254.27	----	8.17	0.00
MW-4	254.36	----	8.29	0.00
MW-7	253.71	----	8.01	0.00
MW-8	253.44	----	7.39	0.00
MW-9	253.74	----	7.13	0.00
MW-11	254.25	----	8.61	0.00
MW-12	253.45	----	7.71	0.00
MW-13	255.44	----	9.19	0.00
MW-14	254.15	----	8.41	0.00
MW-15	254.62	----	8.56	0.00
MW-17	254.83	----	8.61	0.00
MW-18	253.07	Not Gauged		
MW-19	252.57	Not Gauged		
EW-1	254.07	----	7.02	0.00
EW-3	254.33	----	8.21	0.00
EW-4	254.08	----	8.03	0.00
EW-5	253.97	7.91	8.01	0.10
EW-6	253.76	7.91	7.94	0.03
EW-7	254.04	7.65	7.73	0.08
EW-8	253.87	7.70	7.90	0.20
EW-9	253.79	----	7.69	0.00
EW-11	254.69	----	8.88	0.00
EW-12	254.84	----	9.12	0.00
EW-13	255.03	----	9.21	0.00
EW-14	254.75	8.91	8.93	0.02
EW-16	254.40	----	8.40	0.00
EW-17	254.06	8.16	8.22	0.06
EW-18	254.37	----	8.50	0.00
EW-20	253.85	7.92	7.95	0.03
EW-21	254.03	8.13	8.38	0.25
EW-22	254.28	----	8.43	0.00
EW-23	253.83	7.88	7.90	0.02
EW-24	253.89	----	8.44	0.00
EW-25	253.79	----	7.50	0.00
EW-26	253.80	----	7.70	0.00
EW-27	254.09	----	8.01	0.00
EW-29	253.76	----	7.64	0.00
PMI-1	254.79	----	9.04	0.00
PMI-2	254.69	8.65	8.93	0.28
PMI-3	254.50	----	8.51	0.00
PMI-4	254.55	8.50	8.51	0.01
PMI-5	254.40	----	8.35	0.00
PMI-6	254.25	8.13	8.37	0.24

TABLE H POST FP REMOVAL MONITORING WELL GAUGING DATA

Downen Oil Company
 4910 Asher Avenue
 Little Rock, Arkansas
 Facility ID #60000285
 January 27, 2011

Well Number	Well Elevation (top of PVC casing in feet amsl)	Depth to Product (feet below toc)	Depth to Water (feet below top of PVC casing)	Product Thickness (feet)
MW-3	254.27	----	8.19	0.00
MW-4	254.36	----	8.32	0.00
MW-7	253.71	----	6.59	0.00
MW-8	253.44	----	7.14	0.00
MW-9	253.74	----	7.23	0.00
MW-11	254.25	----	8.02	0.00
MW-12	253.45	----	6.71	0.00
MW-13	255.44	----	9.17	0.00
MW-14	254.15	----	8.63	0.00
MW-15	254.62	----	8.80	0.00
MW-17	254.83	----	9.37	0.00
MW-18	253.07		Not Gauged	
MW-19	252.57		Not Gauged	
EW-1	254.07	----	8.56	0.00
EW-3	254.33	----	8.46	0.00
EW-4	254.08	----	8.18	0.00
EW-5	253.97	----	8.16	0.00
EW-6	253.76	----	8.06	0.00
EW-7	254.04	----	7.82	0.00
EW-8	253.87	----	7.90	0.00
EW-9	253.79	----	7.83	0.00
EW-11	254.69	----	8.99	0.00
EW-12	254.84	----	9.11	0.00
EW-13	255.03	----	9.30	0.00
EW-14	254.75	----	9.03	0.00
EW-16	254.40	----	8.52	0.00
EW-17	254.06	----	8.29	0.00
EW-18	254.37	----	8.65	0.00
EW-20	253.85	----	8.05	0.00
EW-21	254.03	----	8.28	0.00
EW-22	254.28	----	8.54	0.00
EW-23	253.83	----	8.02	0.00
EW-24	253.89	----	3.45	0.00
EW-25	253.79	----	7.95	0.00
EW-26	253.80	----	7.87	0.00
EW-27	254.09	----	8.17	0.00
EW-29	253.76	----	7.81	0.00
PMI-1	254.79	----	9.05	0.00
PMI-2	254.69	----	8.85	0.00
PMI-3	254.50	----	8.65	0.00
PMI-4	254.55	----	8.64	0.00
PMI-5	254.40	----	8.50	0.00
PMI-6	254.25	----	8.31	0.00