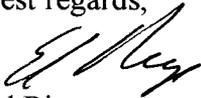


a consistent average flow rate of 5 gpm is a reasonable estimate for flow rates out of our overflow pipe.

- To estimate the duration of overflow events, we have interpreted the daily records as follows: if overflow was marked as having occurred only in one shift by itself, we have assumed that this overflow occurred for a 1/2-hour period. Our experience has been that overflows that stopped within a one four-hour shift period are usually of the kind that could be fixed by the local operator and usually within about 15 minutes. Therefore, assuming that a 1/2-hour overflow occurred in a shift that had overflows only during that shift is a reasonable estimate of the duration of the overflow. For all shifts that are marked contiguously as having had overflows, we have assumed that overflows would have occurred intermittently for about half the time of the entire 4-hours of each contiguous shift, as support personnel would have had to come out and assist the local operator. Thus, a 4-hour shift by itself would have had a total overflow of 150 gallons (at 5 gpm for 30 minutes); and, two or more contiguous 4-hour shifts marked as having overflows would have had total overflows of 600 gallons for each shift period (at 5 gpm for 120 minutes).

Please do not hesitate to contact me at 505-722-0217 if you (or your staff) have any further questions.

Best regards,



Ed Riege
Environmental Manager

ATTACHMENT A