



**PROPOSED UNDERGROUND STORAGE TANK (UST)
RELEASE CASE CLOSURE EVALUATION SUMMARY**

**LUST Case File #4795.01-.04
Facility ID # 0-002799
Coconino County**

**Woody's Food Store #137
55 Pinewood Boulevard
Munds Park, Arizona 86017**

Background:

The Site is currently operated as Woody's Food Store #137 (Woody's), which manages the site as a gasoline and diesel fuel station. Currently, the property contains a convenience store, fuel dispenser islands and a canopy. According to the property manager, potable water is supplied by the city and waste water is directed to an on-site septic system.

Three underground storage tanks (USTs) were installed at the Site in 1971 and a fourth UST was installed in 1976. The site was originally developed as a fuel station in 1972. Giant Industries, Inc. (Giant) reportedly purchased the site from Kaibab Industries (Kaibab) in June 1998. Kaibab is solely responsible for environmental conditions related to the UST System operations before the facility was purchased by Giant. Previous facility names include Kaibab Station #116 and Whiting Station #116.

On December 2, 1997, a Kaibab representative encountered evidence of a potential fuel release in the form of odors emanating from the soil surrounding the fill ports of the USTs. The potential fuel release was reported to the ADEQ on December 3, 1997. The ADEQ subsequently assigned Facility ID# 0-02799 and four leaking underground storage tank (LUST) file Nos. 4795.01 through 4795.04, one for each UST fill port. In September of 1999, Kaibab retained Miller Brooks to perform site characterization drilling and sampling at the former Kaibab Station # 116. The purpose of the exploratory drilling was to assess the potential presence and distribution of hydrocarbon impacted soil located within the area of the four USTs. The drilling and sampling conducted in 1999 consisted of advancing five soil borings, collecting soil samples, converting the soil borings into groundwater monitor wells (MW-KM-1 through MW-KM-5), and collecting groundwater samples.

Benzene concentrations reported in the soil samples collected from the upper unsaturated zone from borings KM-1, KM-2, and KM-3, did not exceed the residential Soil Remediation Levels (rSRLs) or minimum Groundwater Protection Limits (GPLs) by either the on-site or fixed-base laboratories. Soil samples collected from the upper unsaturated zone of boring KM-1 (at 8 and 15 feet below ground surface [bgs]), contained reportable benzene concentrations up to 0.22 milligrams per kilogram (mg/kg), as reported by the on-site laboratory, and up to 0.16 mg/kg, as reported by the fixed-based laboratory. One of the two soil samples collected from the upper unsaturated zone of boring KM-2 (at 10 feet bgs), contained a reportable (on-site laboratory) benzene concentration of 0.38 mg/kg, but

benzene was not reported above the fixed-based laboratory reporting limits. Three of the four soil samples collected from the upper unsaturated zone of boring KM-3 (at 7, 15, and 20 feet bgs) contained reportable on-site benzene concentrations up to 0.33 mg/kg and fixed-base concentrations up to 0.29 mg/kg. Soil samples collected above the upper water-bearing interval deposits (the upper unsaturated zone) of boring KM-4 (samples collected at 10, 15, 20, and 27 feet bgs) did not contain reportable total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX), or methyl-tert butyl ether (MTBE) concentrations above the on-site laboratory and fixed-base laboratory reporting limits. Soil samples collected from the upper unsaturated zone of boring MW-KM-5 (at 10 feet bgs) did not yield BTEX or MTBE concentrations above the fixed-based laboratory reporting limits. The base of the upper water-bearing interval deposits in these soil borings extends to depths of approximately 25 feet bgs.

Soil samples collected from soil borings MW-KM-1 and MW-KM-5 from within the saturated zone of the lower water-bearing interval deposits yielded the highest concentrations reported in soil samples collected from each respective boring.

Miller Brooks collected groundwater samples at the Kaibab site on four occasions between December 9, 1999 and March 29, 2001 on behalf of Kaibab. Groundwater samples were also collected in July 2003, May 2004, June 2010, until the end of the State Assurance Fund. A *Site Characterization Report* for LUST releases #2799.01-.04 was approved in September 2010.

The UST system was removed in July 2016. Based on analytical results from the UST removal, LUST number #4795.05 was issued due to soil contamination present in the UST basin. A *Site Characterization Report* for LUST release .05 was submitted November 3, 2017 but was disapproved by ADEQ. An Addendum to the 90-Day Report was received, and the *Site Characterization Report* should have been approved, along with the LUST release point closure, since no soil contamination was found above applicable regulatory standards in the lateral soil borings.

Kaibab and its consultant ER Systems LLC (ERS), conducted corrective actions at the Site until 2021, when a *Corrective Action Completion Report* was submitted in December 2021. ERS identifies the on-site wells as MW-1 through 5.

Removal or control of the source of contamination:

The UST system was removed in July 2016. In October 2017 and March 2020, ERS conducted an enzyme and nutrient injection application to abate groundwater contamination in the vicinity of MW-1 (MW-KM-1). ERS mobilized to the site, monitored groundwater elevations and applied a solution of enzyme and nutrients into injection wells IP3 through IP5 surrounding the MW-1 location. The biological product used was PetroBac™. NutriMax™ which includes macro- and micro-nutrients specially blended for in-situ bioremediation, were also injected. According to the vendor, these products reportedly work together to efficiently degrade TPH.

Characterization of Groundwater Plume

Munds Park is an inter-mountain valley meadowland on the northwest portion of the Mogollon Plateau in north central Arizona. Perched groundwater occurs within intervals of the alluvial and colluvial deposits, which may be discontinuous, and groundwater may be present only during times of increased precipitation. Historically, some monitor wells at the Site consistently yield very little water during sampling (MW-4), while down gradient monitor well (MW-5) recharges very quickly after purging/pumping.

The groundwater table occurs in a mix of clay and cinder materials with two distinct groundwater aquitards containing groundwater. Groundwater monitoring wells MW-1 and MW-5 represent conditions in the lower aquifer with monitoring wells MW-2 and MW-3 representing conditions in the upper aquifer. Groundwater monitoring well MW-4 is anomalous, and may represent a third aquitard between the upper and lower aquifers. With the varying groundwater elevations and large swings in groundwater depths between sampling events (up to approximately 15 feet), no distinct flow direction is discernable, however historic groundwater flow appears to the south-southeast towards the Pinewood Country Club golf course. Transmissivity between wells is limited with clay content.

Monitoring wells MW-1 through MW-4 were drilled next to the four LUST release areas designated by ADEQ (LUST Nos. 4795.01 through .04). MW--5 was drilled south/southeast of the release areas to provide a monitoring point down gradient of the LUST locations. Historic groundwater sampling has been conducted at the site since initial site characterization activities.

The active fuel dispensing facility located approximately 100 feet west of the site, formerly operated by Chevron Products Company (the former Chevron site), is currently operated by Shell Oil Company [Facility #0-001039, LUST number 2481). The former Chevron site is the location of documented impacts to groundwater from fuel-related hydrocarbons and waste oil [including the detection of free-phase petroleum (free-product)] in monitor wells at that site. LUST numbers 2481.01-.04 were closed in December 2005. The former Chevron MW-8, which was abandoned in 2006, is a cross-gradient well and has not shown any VOC contamination between 1996 and 2006.

In September 2000 groundwater samples from MW-KM-1, MW-KM-2 and MW-KM-5 were analyzed for fecal coliform due to the proximity of a large septic system up-gradient of the site. Some of the historic compounds detected in groundwater samples from the Woody's site monitor wells are halogenated VOCs (chloroform) that are frequently associated with wastewater or drinking water treatment where disinfectant compounds interact to form trihalomethanes as reported in the June 2010 sampling event. The compounds detected in the 2010 event included chloroform and trihalomethanes.

The dramatic groundwater elevation changes recorded in MW-KM-3 (up to approximately 15 feet) indicate that the upper water-bearing interval at that location is susceptible to significant increases during periods of elevated precipitation and perhaps from septic effluent given that the well has more recently exhibited groundwater depths (7-8 feet bgs) far above the surrounding groundwater wells. A review of the historical depth to groundwater measurements and groundwater elevations (corrected for

the May 2000 survey data) of the former Chevron monitor wells indicates that the hydrological conditions observed in Chevron monitor wells MW-4, MW-6, MW-7, and MW-9 were similar to the conditions observed in Kaibab monitor wells MW-KM- 2 and MW-KW-3. Using these data to create groundwater flow maps is problematic, but there is a net groundwater elevation decrease from northwestern monitor wells toward the southeast, roughly paralleling the historical valley drainage.

Since ERS inception as primary consultant, nine compliance sampling events have been conducted from August 1, 2007 through October 18, 2021. On October 18, 2021, ERS conducted groundwater monitoring and sampling activities to determine groundwater conditions at the site 19 months following enzyme and nutrient application. Periodic groundwater VOC concentrations are used to monitor migration and/or attenuation patterns relative to impacted groundwater and human health and environmental impacts. The October 18, 2021 groundwater monitoring and sampling event was conducted as a low flow purge compliance sampling event with groundwater monitoring wells purged prior to sampling. It should be noted that monitoring well MW-4 groundwater elevation was insufficient for purging and grab sampled with a bailer. However, groundwater monitoring wells MW-1, MW-2, MW-3, and MW-5 were monitored and sampled during the event. Groundwater elevation data determined from monitoring wells on October 18, 2021, indicated depth to groundwater measurements between 11.95 feet in MW-2 and 38.01 feet in MW-1. Groundwater elevations measured throughout the site varied, with historic groundwater gradient to the south-southeast. Groundwater gradient and elevations indicate at least two confined/perched levels of groundwater. Only groundwater monitoring well MW-1 exhibited VOC concentrations above laboratory reporting limits. MW-1 also demonstrated benzene concentrations at 339 micrograms per liter ($\mu\text{g/L}$), above the Aquifer Water Quality Standard (AWQS) for benzene of 5.0 $\mu\text{g/L}$. No other VOC constituents were detected in any of the remaining wells (MW-2 through MW-5).

Groundwater Plume Stability

The lateral extent of benzene in groundwater has been determined by non-detection of benzene in samples collected from monitor wells MW-2 through MW-5. Recent benzene concentrations measured in MW-1 have continued to decrease. Benzene contamination present over laboratory reporting limits has not been reported in MW-3, 4, and 5 since August 2017. The benzene concentration in MW-2 was non-detect in October 2021, and has been below AWQS since June 2020. Only groundwater monitoring well MW-1, screened within the deep groundwater perched horizon below 30 feet, exhibits benzene concentrations above AWQS. It should be noted that all other VOC constituents in MW-1 have been below AWQS with only benzene above for the majority of sampling events. In addition, two bio-enhancement applications have been administered at the site injecting enzyme and nutrients. The first bio-enhancement injection was conducted on October 11, 2017 and the second on March 4, 2020.

It appears that the enzyme and nutrient injections have reduced the source area petroleum hydrocarbon impact at the site, abating MW-2 concentrations in groundwater to compliance levels and reducing MW-1 benzene concentrations from 1,410 $\mu\text{g/L}$ on March 27, 2019 to a concentration of 339 $\mu\text{g/L}$ on October 18, 2021. Natural attenuation and biodegradation should continue to reduce MW-1 concentrations over time since nitrate concentrations remain elevated in MW-1.

Natural Attenuation

Degradation of petroleum hydrocarbons in groundwater can proceed via aerobic or anaerobic microbial processes. Bacteria present in soil and groundwater obtain energy for cell production and maintenance by facilitating thermodynamically advantageous oxidation-reduction reactions involving the transfer of electrons from electron donors to available electron acceptors. When sufficient Dissolved Oxygen (DO) is present in groundwater, biodegradation of hydrocarbons proceeds aerobically (with oxygen as the electron acceptor). As oxygen becomes less available, anaerobic microorganisms consume electron acceptors in the following order of preference: nitrate, manganese (IV), iron (III), sulfate, and carbon dioxide. Anaerobic biodegradation processes are thus associated with decreased concentrations of nitrate and sulfate, increased concentrations of dissolved manganese and ferrous iron, and production of methane within the plume (i.e., elevated when compared to background).

For biological products at this site, PetroBac™ product bundle with NutriMax™ nutrients, which include macro- and micro-nutrients specially blended for in-situ bioremediation, were also injected into the soil in March 2020. According to the vendor, these products work together to efficiently degrade total petroleum hydrocarbons (TPH) and their application will perform three critical in-situ functions, including:

1. Supply of a large population of pre-acclimated bacteria to optimize initial growth of a healthy, in situ, hydrocarbon-degrading microbial population.
2. Maximize contact between the contaminants and the bacteria. Bioremediation is a contact technology – the bacteria must physically contact the petroleum food source and the electron acceptors (oxygen, nitrate, and sulfate) to biochemically oxidize the petroleum to CO₂ and water.
3. Supply of critical nutrients like nitrogen, phosphorus, and potassium to support ongoing biological growth. The nitrogen compounds also act as secondary electron acceptors to ensure continuous contaminant degradation during temporary absences of dissolved oxygen.

Select monitored natural attenuation (MNA) parameters were sampled in August 2017, January, April and July 2018, June 2020, May and October 2021. Between June 2020 and October 2021, only nitrate and nitrate chemical analysis was performed to monitor the effectiveness of the Petro Bac™ with the NutriMax™ nutrient supplement. Nitrate and Nitrite concentrations in MW-1 and MW-2 were detected at levels of 19.4 mg/L and 3.54 mg/L respectively in October 2021.

Threatened or impacted drinking water wells

A search of the ADWR database found four “Exempt” well applications within ½ mile of the site. Two private domestic use wells were registered in 1982 as “existing wells” with no additional information provided, according to ADWR imaged records. One private well (#55-9112260) originally installed to a depth of 400 feet with a water level of 163 feet on November 2, 2009, exists approximately ¼ mile west and up-gradient of the facility. According to ADWR imaged records, the well is screened between 160 and 400 feet. In 2007, well #55-906258 was installed for the Elk Hill Pines HOA to a depth of 1,100 feet with a water level of 800 feet, and is located approximately ¼ mile west/southwest of the facility. According to ADWR imaged

records, this well is screened between 540-640 feet and between 1,000-1,100 feet, and was capped in 2008. One well record (#55-630882) originally permitted for Pinewood Country Club on March 17, 1982, indicates a total depth of 350 feet and a water level of 156 feet. This well is listed in ADWR image records as an irrigation well. No other information is available.

The Pinewood Country Club also listed a “Non-Exempt” well installed on December 13, 2006 to 1,240 feet with a groundwater depth of 705 feet and screen interval between 820-1,220 feet. According to ADWR imaged records this well was capped in 2006 after it was installed. This well is located approximately $\frac{1}{4}$ mile down gradient of the site. Five additional “Non-Exempt” wells were listed in the ADWR database for the Arizona Water Company-Pinewood with varying depths between 232 and 1,250 feet. The 1,250-foot primary municipal production well is over $\frac{1}{4}$ mile southeast of the site with a groundwater depth listed at 715 feet. This well (#55-616647) exists down gradient of the site, however draws water from a much deeper aquifer than those impacted by the LUST. The remaining Non-Exempt Arizona Water Company-Pinewood wells are inactive according to the ADEQ Safe Drinking Water database. Arizona Water Company-Pinewood is managed by the Sedona office and provides groundwater to its Pinewood (includes Munds Park) customers from wells located throughout the Pinewood area. According to the 2020 *Annual Water Quality Report* for Public Water System AZ0403002, groundwater is pumped from three active wells, of which only well #55-616647 is located within $\frac{1}{2}$ mile of the LUST site. In January 2021 no VOCs were reported over laboratory reporting limits in the sample collected from the distribution system. The database reports that the water company serves 6,271 persons at a hotel/motel, a mobile home park, a residential area, restaurant and a service station.

The remaining 29 wells listed in the ADWR database within $\frac{1}{2}$ mile of the site were monitor wells primarily for the former Chevron LUST site located west of the Woody’s site and the on-site monitoring wells for the former Kaibab facility.

Other exposure pathways:

A search for sensitive receptors within a $\frac{1}{4}$ mile radius of the site was conducted with no receptors detected. Sensitive receptors included hospitals, schools, daycare facilities and elderly housing. The site is located within the main commercial and retail entrance to Munds Park just east of Interstate 17. Surrounding properties include restaurants, convenience and fuel retail, motels, a golf course, water treatment, construction offices and real estate offices. Residential housing exists north and up gradient across Pinewood Boulevard and frontage commercial properties.

No soil contamination was present over rSRLs, at a depth less than 10 feet bgs, so no ingestion exposure risk is present. Benzene contamination in the soil was present over laboratory reporting limits, so as a conservative measure, those concentrations were compared to the EPA Regional Screening Levels for Resident Soil (November 2021). The historic benzene concentrations do not exceed the carcinogenic screening level of 1.2 mg/Kg or the noncancer child Hazard Index of 82 mg/Kg. These screening levels includes the ingestion and inhalation exposure routes. Benzene does not have dermal contact toxicity values due to its volatility.

The perched groundwater has benzene contamination at 339 µg/L at MW-KM-1. This perched aquifer is not used as a source of potable water, so the potential risk from ingestion or inhalation is *de minimis*.

Requirements of A.R.S. §49-1005(D) and (E):

The results of the groundwater data from the site assure protection of public health, welfare and the environment, to the extent practicable, and allow for the maximum beneficial use of the site, while being reasonable, necessary and cost effective.

Other information that is pertinent to the LUST case closure approval:

The facility and LUST files were reviewed for information regarding prior cleanup activities, prior site uses and operational history of the UST system.

Groundwater data tables:

MW-1 (UST basin)

Total Depth: 41 feet Screened interval: 25.5-40.5 feet (lower perched zone)

Date	Benzene AWQS is 5 µg/L	Depth to water (feet)
December 1999	6,500	31.34
June 2000	7,800	32.67
September -October 2000 0.01-0.02 feet free product	3,700-7,400	33.91-35.56
March 2001	6,900	29.83
July 2003 Not purged sample	3,600	33.23
May 2004	2,000	35.05
June 2010	4,800	29.86
October 2012	1,200	34.43
July 2013	670	34.67
August 2017	1,050	33.80
October 2017 Bio-enhancement injections	Not analyzed	Not measured
April 2018	235	38.84
July 2018	17.7	38.65
March 2019	1,410	31.89
October 2019	968	36.16
March 2020 Bio-enhancement injections	Not analyzed	Not measured
June 2020	1,500	30.19
September 2020	3,140	33.86
May 2021	570	38.31
October 2021	339	38.01

MW-2 (UST basin)

Total Depth: 25 feet Screened interval: 10-25 feet (shallow perched zone)

Date	Benzene AWQS is 5 µg/L	Depth to water (feet)
December 1999	2,700	18.47
June 2000	1,100	16.13
March 2001	1,800	11.69
July 2003 Not purged sample	390	17.66
May 2004	2,400	17.76
June 2010	200	15.59
October 2012	730	17.92
July 2013	630	20.40
August 2017	401	17.44
October 2017 Bio-enhancement injections		
April 2018	65.6	15.12
July 2018	34.2	16.39
March 2019	<1.0	8.07
October 2019	7.02	11.72
March 2020 Bio-enhancement injections	Not analyzed	Not measured
June 2020	2.05	8.52
September 2020	3.84	9.45
May 2021	1.89	13.26
October 2021	<1.0	38.01

MW-3 (down gradient of UST basin)

Total Depth: 25 feet Screened interval: 10-25 feet (shallow perched zone)

Date	Benzene AWQS is 5 µg/L	Depth to water (feet)
June 2000	1,800	23.85
March 2001	2,400	7.33
July 2003 Not purged sample	120	23.41
May 2004	380	23.09
June 2010	170	8.56
October 2012	Not analyzed	23.85
July 2013	Not analyzed	23.91
August 2017	5.41	20.76
October 2017 Bio-enhancement injections	Not analyzed	Not measured
April 2018	<1.0	23.13
July 2018	<1.0	19.12
March 2019	<1.0	7.61
October 2019	<1.0	12.86

May 2020 Bio-enhancement injections	Not analyzed	Not measured
June 2020	<1.0	10.55
September 2020	<1.0	12.81
May 2021	<1.0	23.00
October 2021	<1.0	13.35

MW-4 (diesel UST basin)

Total Depth: 30 feet Screened interval: 10-30 feet (lower perched zone)

Date	Benzene AWQS is 5 µg/L	Depth to water (feet)
June 2000	<0.50	29.19
March 2001	<1.0	28.72
July 2003 Not purged sample	0.63	29.15
May 2004	110	29.16
June 2010	5.5	28.87
October 2012	Not analyzed	29.15
July 2013	Not analyzed	29.20
August 2017	1.90	27.97
October 2017 Bio-enhancement injections	Not analyzed	Not measured
April 2018	<1.0	28.93
March 2019	<1.0	24.89
October 2019	<1.0	29.22
June 2020	<1.0	28.81
September 2020	<1.0	29.14
May 2021	<1.0	29.19
October 2021	<1.0	27.89

MW-5 (down gradient well)

Total Depth: 42 feet Screened interval: 27-42 feet (lower perched zone)

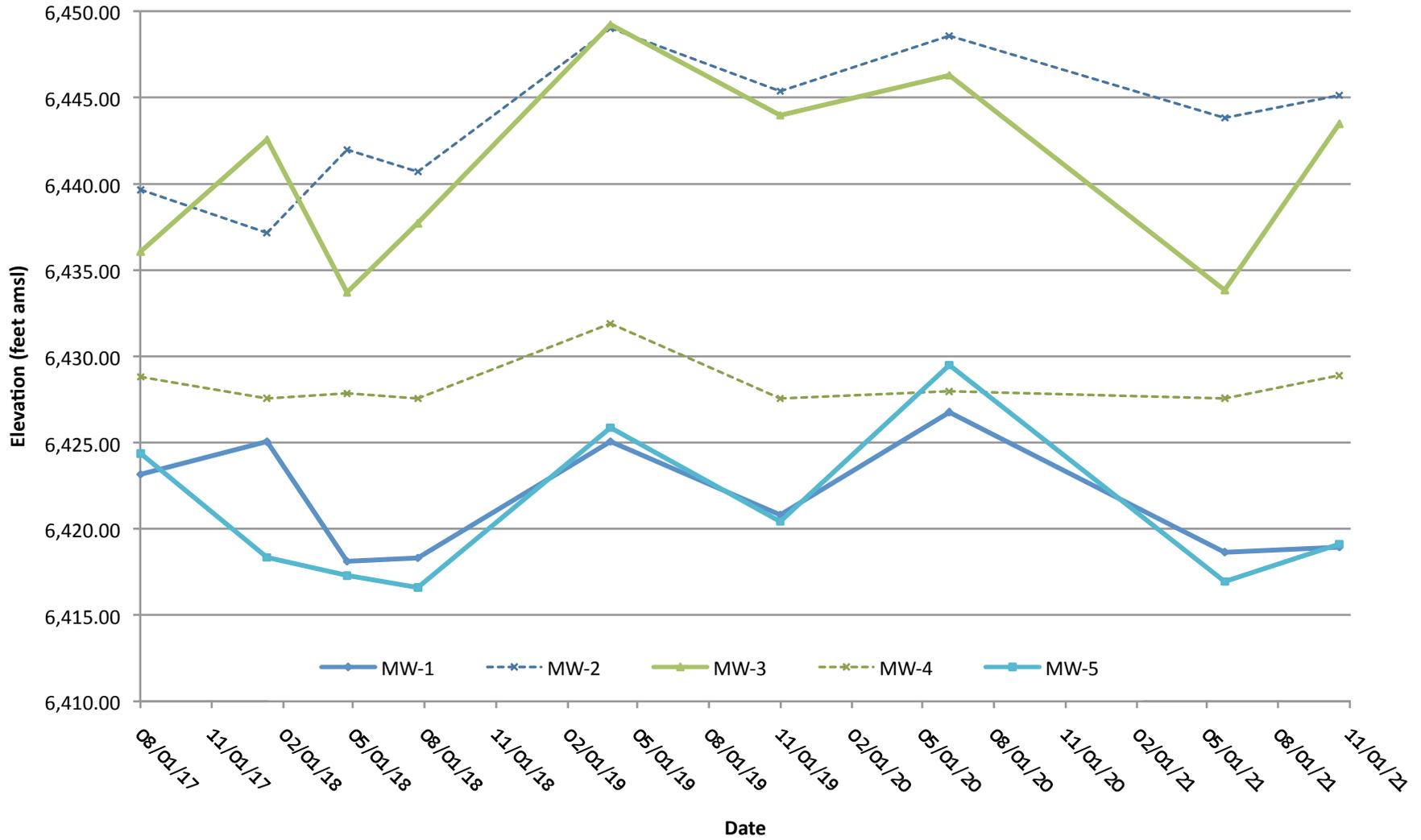
Date	Benzene AWQS is 5 µg/L	Depth to water (feet)
December 1999	14	32.00
June 2000	84	33.19
March 2001	210	30.27
July 2003 Not purged sample	0.63	33.66
May 2004	110	35.68
June 2010	5.5	30.26
October 2012	92	35.14
July 2013	380	35.31
August 2017	<1.0	32.83

October 2017 Bio-enhancement injections	Not analyzed	Not measured
April 2018	<1.0	39.91
March 2019	<1.0	31.33
June 2020	<1.0	27.71
September 2020	1.98	33.18
May 2021	<1.0	40.25
October 2021	<1.0	38.08

Former Chevron MW-8 (cross gradient well) installed in 11/1994 and abandoned in 2006
 Total Depth: 37 feet Screened interval: 5-35 feet

Date	Benzene AWQS is 5 µg/L	Depth to water (feet)
December 1996	<0.5	26.81
March 1998	<0.5	16.51
March 1999	<1.0	24.19
May 1999	<1.0	22.60
June 2000	<1.0	22.00
November 2001	<1.0	28.90
November 2002	<1.0	28.80
June 2003	<2.0	24.56
December 2003	<1.0	28.07

Figure 3. Hydrographs
Former Whiting Station #125
55 Pinewood Blvd, Munds Park, AZ 86017





EXPLANATION



Approximate Property Boundary

Image Reference: Google Earth, Imagery Date: 04/17/17

APPROXIMATE SCALE



ER Systems, LLC.

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 CAREFREE, AZ 85377-3674
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VICINITY MAP

Former Whiting Station
 55 Pinewood Blvd
 Munds Park, AZ 86017
 LUST # 4795.01-05 Facility ID # 0-002799

Date: **09/05/17**

Prepared By:
E. KNOEBL

Reviewed By:
E. KNOEBL

Project No:

Figure: **1**

Approximate Property Boundary

Release Point
Lust #4795.05

Former UST Pit

Former UST Pit

MW-2 10/18/21 EPA Method 8260 (ug/L)

ELEV	B	T	E	X	1,2-DCA	MTBE
6,445.14	<1.0	<1.0	<1.0	<3.0	<1.0	<1.0

MW-4 10/18/21 EPA Method 8260 (ug/L)

ELEV	B	T	E	X	1,2-DCA	MTBE
6,428.89	<1.0	<5.0	<1.0	<3.0	<1.0	<1.0

MW-1 10/18/21 EPA Method 8260 (ug/L)

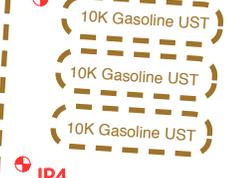
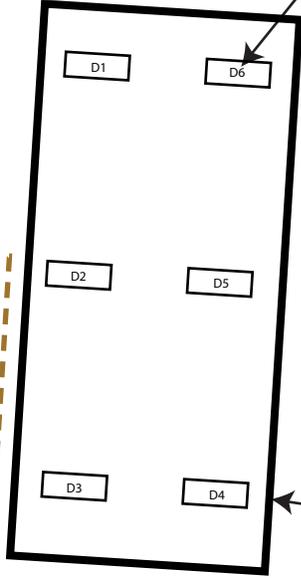
ELEV	B	T	E	X	1,2-DCA	MTBE
6,418.95	339	59.9	<50.0	189	<50.0	<50.0

MW-3 10/18/21 EPA Method 8260 (ug/L)

ELEV	B	T	E	X	1,2-DCA	MTBE
6,443.49	<1.0	<5.0	<1.0	<3.0	<1.0	<1.0

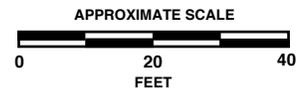
MW-5 10/18/21 EPA Method 8260 (ug/L)

ELEV	B	T	E	X	1,2-DCA	MTBE
6,419.12	<1.0	<5.0	<1.0	<3.0	<1.0	<1.0



EXPLANATION

Groundwater Monitoring Well Location



ER Systems, LLC.

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SITE PLAN
Groundwater Conditions Map
October 18, 2021

Former Whiting Station
55 Pinewood Blvd
Munds Park, AZ 86017
LUST # 4795.05 Facility ID # 0-002799

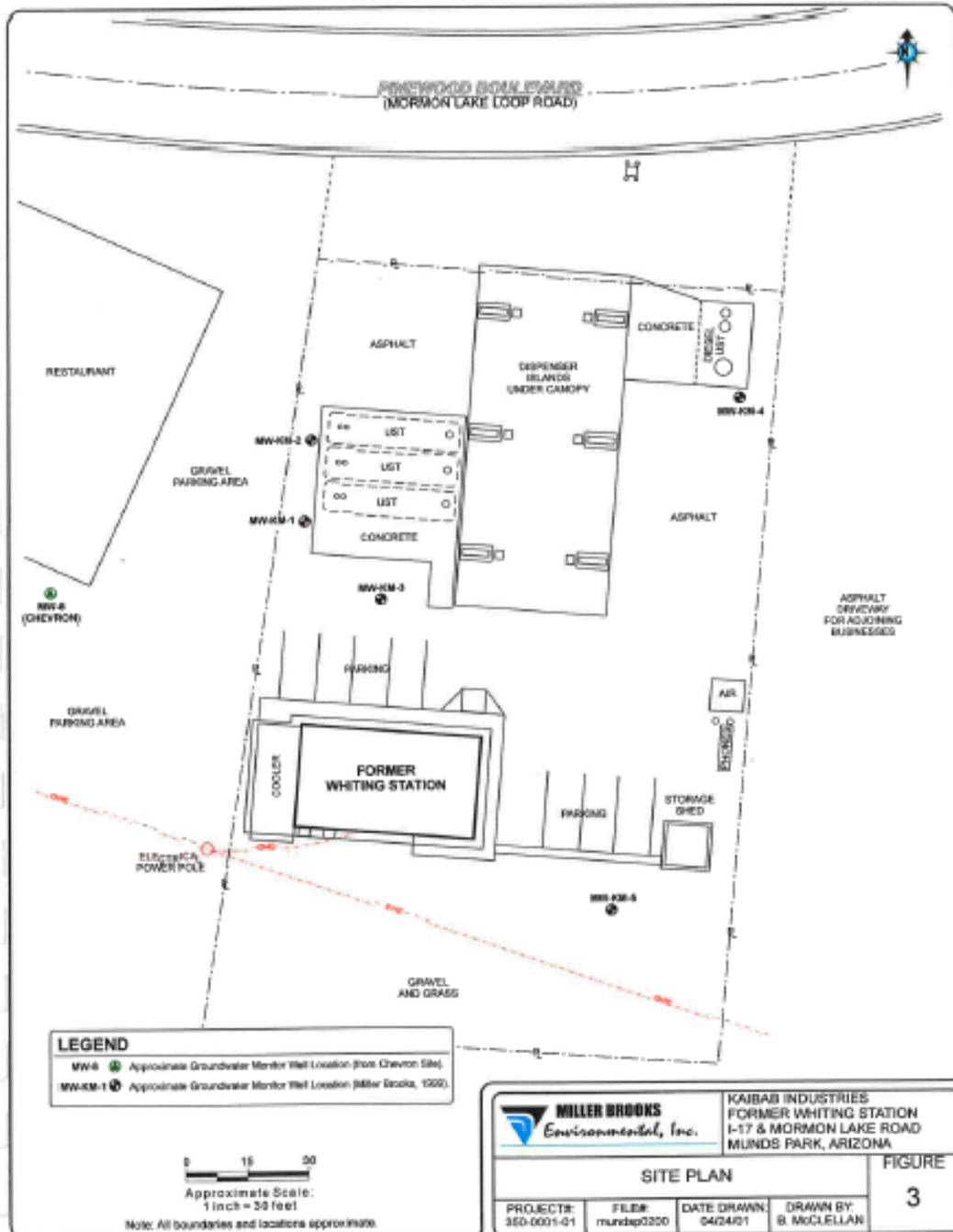
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Prepared By:
E. KNOEBL

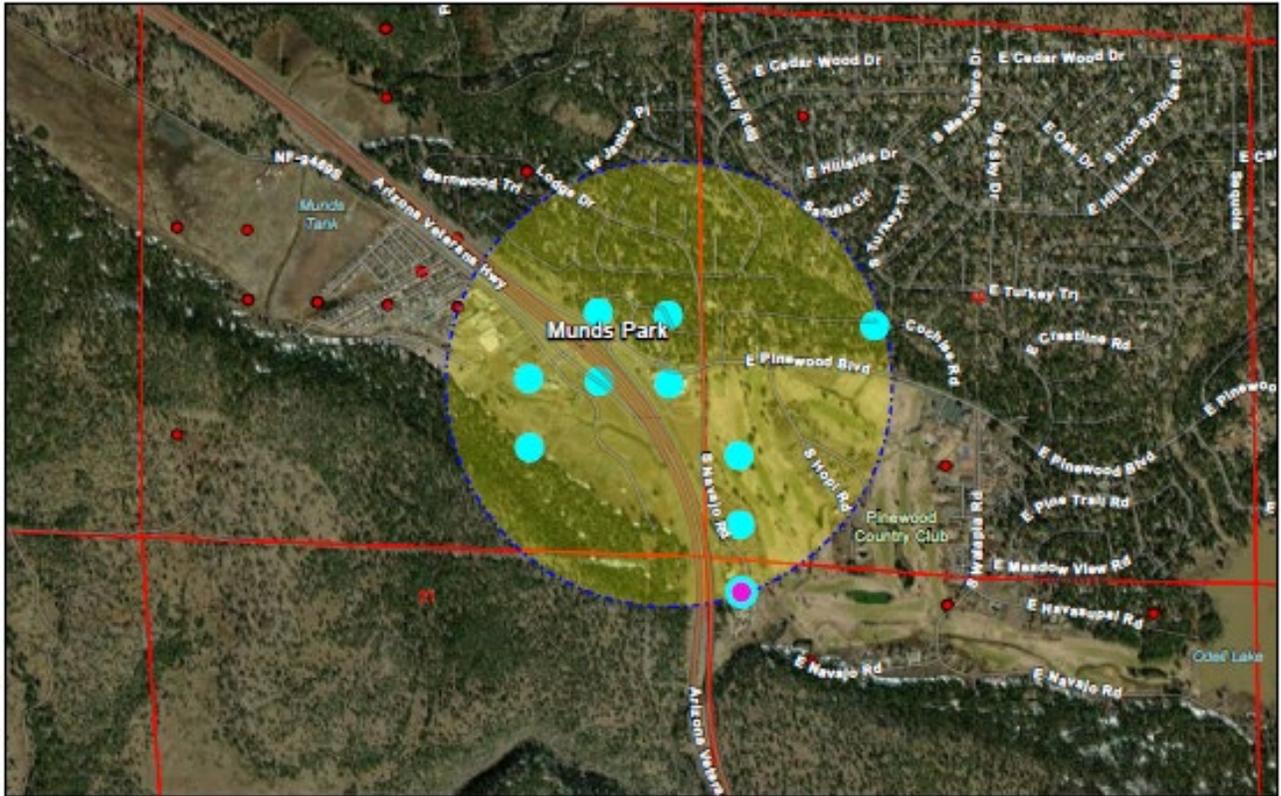
Reviewed By:
E. KNOEBL

Project No:

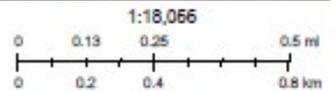
Figure: **2**



0.5 Mile Radius Map



November 22, 2021



Map: Community Maps Contributor, County of Yavapai, Inc.; HERE, Garmin

Arizona Department of Water Resources