March 7, 2002

MAR I I KULK

Mr. Scott Hooton BP Oil Company Environmental Resources Management 295 SW 41st Street Bldg. 13 STE N. Renton, Washington 98055-4931

Re: LETTER OF TRANSMITTAL

Well Abandonment Report

BP Site No. 11116 7197 Village Parkway Dublin, California

Dear Mr. Hooton:

Cambria Environmental Technology, Inc. has enclosed the Well Abandonment Report for the abovereferenced site for your use. We have distributed copies of the report on your behalf as noted below.

We appreciate the opportunity to provide BP with environmental consulting services. If you have any questions or comments, please do not hesitate to call me at (510) 450-1985.

Sincerely,

Cambria Environmental Technology, Inc.

Khaled Rahman, R.G., C.H.G.

Associate Geologist

Enclosures: Well Abandonment Report dated March 7, 2002 (4 copies)

Oakland, CA San Ramon, CA

Sonoma CA

Cambria **Environmental** Technology, Inc.

1144 65th Street Suite B Oakland, CA 94608 Tel (510) 420-0700 Fax (510) 420-9170

cc: Eva Chu, Alameda County Health Services Agency, 1131 Harbor Bay Parkway, 2nd Floor.

Alameda, California 94502 (1 copy)

Wyman Hong, Alameda County Zone 7 Water Agency, 5997 Parkside Drive, Pleasanton, California 94588-5127 (1 copy)

WELL ABANDONMENT REPORT

MAR 1 1 2002

BP Site No. 11116 7197 Village Parkway Dublin, California Cambria Project No. 852-1743

March 7, 2002

3

Prepared for:

BP Oil Company
Environmental Resources Management
295 S.W. 41st Street
Building 13, Suite N
Renton, Washington 98055

Prepared by:

Cambria Environmental Technology, Inc. 1144 65th Street, Suite B Oakland, California 94608

Oakland, CA San Ramon CA Sonoma CA

Cambria Environmental Technology, Inc.

1144 65th Street Suite 8 Dakland CA 94608 Te (510) 420-0700 Fax (510) 420-9 70 Sara Dwight
Staff Scientist

M nn n

Khaled B. Rahmai No. 0261

Khaled B Rahman, R.G., C H G Associate Geologist



WELL ABANDONMENT REPORT

BP Site No. 11116 7197 Village Parkway Dublin, California Cambria Project No. 852-1743

March 7, 2002



INTRODUCTION

Cambria Environmental Technology, Inc. (Cambria) is submitting this *Well Abandonment Report* for activities at the above-referenced BP Oil Company (BP) site. These well abandonment activities were requested in an October 25, 2001 Alameda County Health Care Services Agency (ACHCSA) letter. The site background and well abandonment activities are described below.

SITE BACKGROUND

Site Description: The site is an inactive gasoline retail outlet located at the intersection of Village Parkway and Amador Valley Boulevard in Dublin, California. BP acquired the property from Mobil Oil Corporation in 1989. In 1994, BP transferred the property to TOSCO Marketing Company (TOSCO) and has not operated the facility since that time.

Previous Work: Six monitoring wells (MW-1 through MW-3 and AW-4 through AW-6) were installed at the site in 1989-1990 and have been monitored periodically since that time (see Appendix A). We understand that wells AW-5 and AW-6 were previously destroyed.



WELL ABANDONMENT ACTIVITIES

The October 25, 2001 ACHCSA letter requested that onsite monitoring wells MW-1 through MW-3, AW-4 and the tank backfill well be abandoned before a remedial action completion letter could be issued. During a November 13, 2001 conversation with Wyman Hong of the Alameda County Zone 7 Water Agency (ACZWA), pressure grouting was acceptable because no further action was required at the site.

Personnel Present: Sara Dwight, Cambria Scientist, working under the supervision of Khaled

Rahman, California Registered Geologist.

Wells Abandoned: Five (MW-1, MW-2, MW-3, AW-4 and tank backfill well).

Permits: ACZWA Permit No. 22011 was issued for the abandonment of the wells

(see Appendix B).

Drilling Company: Gregg Drilling of Martinez, California (C-57 License # 485165).

Well Abandonment Date: January 31, 2002.

Well Depths: Before pressure grouting, the total depths of the wells were recorded. The

total depth of well MW-1 was 25 feet below ground surface (bgs). The total depth of wells MW-2 and MW-3 was 26 feet bgs. The total depth of well AW-4 was 35 feet bgs. The total depth of the tank backfill well

17 feet bgs.

Abandonment Method: Wells MW-1 through MW-3, AW-4 and the tank backfill well were

abandoned by injecting neat Portland cement grout through a tremie pipe under pressure to the bottom of the well. After the well casing had been filled with grout, the casing was pressurized using a grout pump. After grouting the casing and sand pack, wells MW-1 through MW-3 were capped with rapid set concrete. Well AW-4 and the tank backfill well were located on unpaved ground and were not capped with concrete. Cambria's standard procedures for well abandonment are included as

Appendix C. boring logs are presented as Appendix D. and Well

Completion Report forms are presented in Appendix E.

Well Abandonment Report BP Oil Site No. 11116 Dublin, California March 7, 2002

CAMBRIA

CLOSING

The abandonment of wells MW-1 through MW-3, AW-4 and the tank backfill well completes field activities at this site. As noted in the ACHCSA letter, with the abandonment of these wells, the site now meets requirements for issuance of a remedial action completion letter.



ATTACHMENTS

Appendix A - Background Information

Appendix B – Well Abandonment Permits

Appendix C - Standard Field Procedures for Abandoning Monitoring Wells

Appendix D – Boring Logs

Appendix E - Well Completion Report Forms

H:\British Petroleum\11116-Dublin\Well Abandonment\Well Abandonment Report.doc



Appendix A

Background Data

AMADOR VALLEY BOULEVARD LEGEND: DISPENSER ISLAND ⊕ TW-6 MW-1 & GROUNDWATER MONITORING WELL TD-3 TOSCO DISPENSER GRAB SAMPLE LOCATION TW-5 **⊕** 8-WT THP-1 TOSCO HYDRO PUNCH BORING LOCATION RESIDENTIAL SB-1 . SOIL BORING LOCATION TUNUERGROUND TW-1 1 TEMPORATIY QUALITATIVE SHALLOW GROUNDWATER SURVEY BORING SB-2 UNDERGROUND USED OIL TANK 1 TW 7 0 AW-5 TW-2 いてはとなべて SB-3 🎝 ⊕\ THP-2 DISPENSER NOTE: Collect Dispensor Grab Samples if PID Readings Exceed 10 ppm. ISLANOS 15.4.1.1. MW-3 ♦ 1 ⊙ THP-1 UNPAVED AREA **a** TW-3 ◆ TW-4 TW-1 AW-4 SCALE (ft) TACO BELL Figure A-1 TOSCO #11116 7197 VILLAGE PARKYAY DUBUN, CAUFORNIA DATE R-14-84 DMI. MLP SOURCE: ALISTO (APRIL 7, 1994) Northwest, Inc. 0952-032.03 SITE PLAN



Appendix B

Well Abandonment Permits



5997 PARKSIDE DRIVE PLEASANTON, CALIFORNIA 94588-5127

VOICE (925) 484-2600 X235 FAX (925) 462-3914

DRILLING PERMIT APPLICATION

FOR APPLICANT TO COMPLETE

FOR OFFICE USE

Dublin	PERMIT NUMBER 22011
California Coordinates Sourceft. Accuracy=ft.	WELL NUMBER 2S/1W 36P15 - 36P18 & 36P37 APN 941 0210 013 00
APN	AFN
CLIENT	PERMIT CONDITIONS
Name BP Oil Company - Scott Hooten Address 295 SW 41 st St BILLIBSKUPhone 425-251-0689	Circled Permit Requirements Apply
City Renton WA Zip 98055	
APPLICANT Name Cambria Environmental - Khaical Rahman Fex 90-450-8295 Address 6262 Hallis St Phone 50-450-8294 City Emergrille CA Zip 94608	 A. GENERAL 1. A permit application should be submitted so as to arrive at the Zone 7 office five days prior to proposed starting date. 2. Submit to Zone 7 within 60 days after completion of permitted work the original Department of Water Resources Water Web Drillers Report or equivalent for well projects, or drilling logs at location sketch for geotechnical projects.
TYPE OF PROJECT Well Construction Geotechnical Investigation Cathodic Protection General Gen	 Permit is void if project not begun within 90 days of approved date. WATER SUPPLY WELLS Minimum surface seal thickness is two inches of cement grout placed by tremie. Minimum seal depth is 50 feet for municipal and industrial we
New Domestic D Replacement Domestic D Municipal D Irrigation D Other D DRILLING METHOD: Mud RotaryD Air Rotary D Auger D	or 20 feet for domestic and irrigation wells unless a lesser det is specially approved. 3. An access port at least 0.5 inches in diameter is required on the wellhead for water level measurements. 4. A sample port is required on the discharge pipe near the wellhead. C. GROUNDWATER MONITORING WELLS INCLUDING
Cable D Other X Pressure Growt	PIEZOMETERS 1. Minimum surface seal thickness is two linehes of cement gro
WELL PROJECTS See Addached - 5 wells to be abandoned Drill Hole Diameter in. Maximum Casing Diameter in. Depth ft. Surface Seal Depth ft. Number	placed by tremie.
GEOTECHNICAL PROJECTS Number of Borings Maximum Hole Diameter in Depth fr	E. CATHODIC. Fill hole above anode zone with concrete placed tramie WELL DESTRUCTION See attached
ESTIMATED STARTING DATE 1/31/01 ESTIMATED COMPLETION DATE 1/31/01	SPECIAL CONDITIONS
I hereby agree to comply with a Frequirements of this permit and Alameda County Ordinance No. 73.68 APPLICANT'S COUNTY OF THE COUNTY OF THE PROPERTY OF THE P	Approved Wyman Hong Date 1/18/02 Nyman Hong 8/6/

Zone 7 Water Resources Engineering Groundwater Protection Ordinance

BP Oil Company
7197 Village Parkway
Dublin
Wells 25/1W 36P15 (MW-1), 36P16 (MW-2), 36P17 (MW-3),
36P18 (AW-4) and 36P37 (tank well)
Permit 22011

<u>Destruction Requirements:</u>

- Clean out all bridged or poorly compacted materials to the bottom of the well.
- 2. Sound the well as deeply as practicable and record for your report.
- 3. Pressure grout the casing to two feet below the finished grade or original ground, whichever is the lower elevation.
- 4. Remove the casing, seal, and gravel pack to two feet below the finished grade or original ground, whichever is the lower elevation (optional).
- 5. After the seal has set, backfill the remaining hole with compacted material (optional).



Appendix C

Standard Field Procedures for Abandoning Monitoring Wells

STANDARD FIELD PROCEDURES FOR ABANDONING MONITORING WELLS

This document presents standard field methods for abandoning ground water monitoring wells. The objective of well abandonment is to destroy wells in a manner that is protective of potential water resources. The two procedures most commonly used are pressure grouting and drilling out the well. These procedures are designed to comply with Federal, State and local regulatory guidelines. Specific field procedures are summarized below.

Pressure Grouting

Pressure grouting consists of injecting neat Portland cement through a tremie pipe under pressure to the bottom of the well. The cement is composed of about five gallons of water to a 94 lb. sack of Portland L/II Cement. Once the well casing is full of grout, it remains pressurized by applying pressure with a grout pump. The well casing can also be pressurized by extending the well casing to the appropriate height and filling it with grout. In either case, the additional pressure allows the grout to be forced into the sand pack. After grouting the sand pack and casing, the well vault is removed and the area resurfaced or backfilled as required.

Well Drill Out

When well drill out is required, a hollow-stem auger drilling rig is used to drill out the well casing and pack materials. First, drill rods are dropped down the well and used to guide the augers as they drill out the well. Once the well is drilled out, the boring is filled with Portland cement injected through the augers or a tremie pipe under pressure to the bottom of the boring. The well vault is removed and the area resurfaced or backfilled as required.



Appendix D

Boring Logs

,			В	0 1	RIN	T G	LOG.	
Project N KEI-P88-1	o. 206	ير		ng (ing D	iameter	Logged By
Project N Dublin, V	ame Mob illage P	il, kwy.	Well	Hea	ad El N/A	evati	on i	Date Drilled 8/29/89
Boring No MW1	•		Dril: Metho		j 	Holl Auge	ow-stem r	Drilling Company EGI
Penetra- tion blows/6*	lon level Sa			oth (ft) Staples gr			1	Description
9/18/24 6/7/10 6/8/9	—		10 -		CH SM		Clay, high moist, high moist, high moist, high moist, high moist, high from 9-1 Color chargray.	nd and gravel: fill. 0 8". gh plasticity, stiff, black.

Project No	0.		·			LOG	T	
KEI-P88-1	206		Boring 9"	e cas	2	Logged By D.L.		
Project No Dublin, V	ame Mob illage P	Mobil, Well Head Elevation Date Drilled 8/29/89						
Boring No.	•		Drillin Method	g 	Holl:	ow-stem r	Drilling Company EGI	
Penetra- tion blows/6"	G. W. level	Der Sar	(ft)	4	ati- phy S		Description	
		_		СН		Clay, as	above.	
		-				Silty classiff, n	ay, high plasticity, noist, olive gray.	
	-							
	-		25					
		_	=					
			\exists	:				
			30					
								·
	<u>[</u>	- 	크	·				
	ļ	- -						
	<u> -</u>	- 	35			•		٥
	- -	-					•	
	-	- - -						
	,	- - -	40			ı,	OTAL DEPTH 26'	

WELL COMPLETION		D	T	1	C	Ð	3	1	
-----------------	--	---	---	---	---	---	---	---	--

	lage Parkway BORING/WELL NO. MW1
Flush-mounted Well Cover	A. Total Depth:
*Boring diameter can vary from	8-1/4" to 9" depending on bit wear.

			1	вог	RIN	G :	LOG		
Project No KEI-P88-12			Bor:		Cas	ing D	iameter	Logged By D.L.	
Project Na Dublin, V			Wel	l Hea	ed El N/A	evati	on	Date Drilled 8/29/89	
Boring No. MW2		Dri Metl	lling	J	Holle Auge	ow-stem r	Drilling Company EGI		
Penetra- tion blows/6"	G. W. level		oth (ft) Straples grap					Description	
			0 -				A.C. Pave Clay, sai	ement nd and gravel: fill.	
					СН		Clay, hic moist, i	gh plasticity, stiff, black.	
14/17/21		- ·	5		ML SM		dark gra	n clay, stiff, moist, ay. ad, dense, moist, dark	
8/13/12			10		CH/		Sandy classiff, n	ay, high plasticity, moist, very dark gray.	
9/11/11							moist, d cementat	th plasticity, stiff, lark olive gray with sion, blocky.	
8/8/14	<u>Ť</u> .		15				gray.		
							silt and	h plasticity, trace-20% sand, stiff, moist, we gray to very dark	
	,		20						

			во	RIN	G 1	COG	
Project No. KEI-P88-120	6		Boring 9 [#]	& Cas	ing Di	lameter	Logged By D.L.
Project Name Dublin, Vil	e Mobi lage Pk	l,	Well He	ad El N/A	evatio	on	Date Drilled 8/29/89
Boring No. MW2			Drillin Method	g	Holld Auger	ow-stem	Drilling Company EGI
	G. W. level	Der Sar	oth (ft)	1	ati- phy S		Description
>			35	CH		Silty cl stiff,	ay, high plasticity, moist, olive gray. TOTAL DEPTH 26'

	1
METT COMBTE	TION DIAGRAM
PROJECT NAME: Mobil - Dublin, Vil	lage Parkway BORING/WELL NO. MW2
PROJECT NUMBER: KEI-P88-1206	
WELL PERMIT NO.:	
Flush-mounted Well Cover	A. Total Depth: 26'
TIMES	B. Boring Diameter*: 9"
	Drilling Method: Hollow Stem
	<u>Auger</u>
	C. Casing Length: 26!
	Material: Schedule 40 PVC
	D. Casing Diameter: OD = 2.375*
	<u>ID = 2.067*</u>
	E. Depth to Perforations: ***6!*
	F. Perforated Length: 20'
	Machined Perforation Type: Slot
	Perforation Size: 0.020*
	G. Surface Seal: 31
	Seal Material: Concrete
	H. Seal: 2'
F	Seal Material: Bentonite
	I. Gravel Pack: 21'
	RMC Lonestar
	Pack Material: Sand
	Size: #3
	J. Bottom Seal: None
	Seal Material: N/A

*Boring diameter can vary from 8-1/4" to 9" depending on bit wear.

•								
* 1				ВО	RIA	i G	LOG	
Project N KEI-P88-1			Bor 9	ing	& Cas	sing D	Logged By, D.L.	
Project No.	ame Mob illage P	il, kwy.	Wel	.l Hea	ad El N/A	evati	on	Date Drilled 8/29/89
Boring No MW3	•			lling	3	Holl Auge	ow-stem r	Drilling Company EGI
Penetra- tion blows/6*	tion level Sa			ft)		ati- phy s	I	Description
					•		A.C. Pave Clay, sar	ement nd and gravel: fill.
					СН		Clay, hig moist, h	ph plasticity, stiff, plack, silty above 31.
10/16/22			5		ML		Silt, 10- dark gra	15% clay, stiff, moist,
		<u> </u>					moist, v	h plasticity, stiff, ery dark gray to black. y, high plasticity,
5/5/6	•		10		СН		soft, mo dark gra	ist to very moist, very y, with cemented root ncreasing with depth.
9/9/12		 					trace sa	y, high plasticity, nd, firm, moist, dark ay, with cemented root race gravel below 13'.
4/7/9	÷		15					
							stiff, mo	n plasticity, very pist, dark olive gray dark gray.
9/12/17	· -	_	20	\blacksquare				

			ВО	RI	NG :	LOG		,		
Project No KEI-P88-12	206		Boring 9"	& C	asing D	iameter		Logged By D.L.		
Project Na Dublin, Vi	ame Mobi	il, kwy.		ead 1	Elevatio		Date Drilled 8/29/89			
Boring No. MW3		Drilli Method	ng	Holl Auge	ow-stem r	1	rilling Company			
Penetra- tion blows/6"	G. W. level		oth (ft) mples	g	Strati- graphy USCS			Description		
		 				Clay,	as abo	ove.		
				CI		Silty very	clay, stiff,	high plasticity, , moist, olive gray		
,			25 —							
			- - -			.,				
			30 -			r				
	,						• 1			
			35 —							
	-	_				-1				
	,	_	40 —	_			TOT	TAL DEPTH 26 t		

WELL COMPLETION DIAGRAM

ROJECT NAME: Mobil - Dubli	in. Village Par	kway BORING/WELL NO. MW3
PROJECT NUMBER: KEI-P88-120	06	
ELL PERMIT NO.:		
Flush-mounted Well Cover	r", 'A:	Total Depth: 261 ham
नार्यक्ति विष		Boring Diameter*: 9"
	**	Drilling Method: Hollow-Stem
	e i samenta e c	Auger
	(*************************************	Casing Length: 26!
		Material: Schedule 40 PVC
	1 p.	Casing Diameter: OD = 2.375*
	,	ID = 2.067*
	E.	Depth to Perforations: 6'
	F.	Perforated Length: 20'
î l		Machined Perforation Type: Slot
	und and a second	Perforation Size: 0.020
	G.	Surface Seal: 2:
	₩ . * ₩	Seal Material: Concrete
	н.	Seal: 2'
		Seal Material: Bentonite
	ı.	Gravel Pack: 22!
		RMC Lonestar Pack Material: Sand
		Size: <u>#3</u>
		Bottom Seal: None
E	J	Seal Material: N/A
*Boring diameter can va	ary from 8-1/4"	to 9" depending on bit wear.

ALTON GEOSCIENCE, Inc. LOG OF EXPLORATORY BORING FIELD SKETCH OF BORING LOCATION								CLIENT M LOCATION	PROJECT NO. 30-095 DATE DRILLED 11/6/90 CLIENT Mobil Oil Corporation LOCATION 7197 Village Pkwy, Dublin LOGGED BY B. Nagle APPROVED BY					
тс)P C	OF C	ASII	NG E	LEVATION 333	.44	÷	SAMPLER TO CASING DAT	THOD Hollo PE Modified A Perforation Vest Hazmat		-01 MAI			
Œ,		€	\	ا نيد	Ö. ce			WATER LEVEL	26'	8.51*	ange a somm			
15		F	빌	CEPTH	医萎	3	PROFILE	DATE	11/6/90	<u>i 11/15/90 i i </u>	a suppose of the			
BLOWG PER	HOOH (III)	CGI(PPM)	SAMPLE	25	1 8 6 2	8	Ĕ	TIME	1 0930		make - make to be at a			
<u> </u>	_	٦	8		まどさむ Street Box	-	185	• • • • • • • • • • • • • • • • • • •		DESCRIPTION	a mini train y minimum notherno			
				-0	PRIAGE DOX	*		(·- , -)	E working I'm second	estalista gara on servicina esta ne negativa	<u> </u>			
8,5	5, 8	0.	A CONTRACTOR AND A CONT	4 6 8		SM		SILTY CLAY; broof silty sand		moist, moderate plasticity, s	•			
3, 4 4, 7,		0		-10 -12 -14 -16	4" sch. 40 PVC Casing	CL				ets; no sand lens	. `			
3, 4	. , 8	0		- 18 - 20 - 22	4" sch. 40			rootlets		vels to 1/2-inch diameter; no)			
5, 9	9, 9			- 24 - 26 - 28	.010"	호		Color change to change to wet	mottled grayis	sh brown and brown; moistu	ire			
3, 5	, 11		I	30		БМ		Softer drilling at SILTY SAND; lig		, medium dense				
				- 34		CL		SILTY CLAY; bro	own, damp to r	moist, low plasticity, very stif	f			

	GO	FE		SCIENCE, Inc ORATORY	c.		CLIENT M	PROJECT NO. 30-095 DATE DRILLED 11/6/90 DELIENT Mobil Oil Corporation, USA LOCATION 7197 Village Pkwy, Dublin LOGGED BY B: Nagles Approved BY				
FIELD	SKE	TCł	OF	BORING LOCATI	ON			Page 2 of 2 DRILLING METHOD Hollow stem auger HOLE DIAM. 10" SAMPLER TYPE Modified split spoon CASING DATA Perforations: 20-35 DRILLER West Hazmat				
TOP	OF C	asin	IG E	LEVATION <u>333.</u>	4	-	SAMPLER TY					
BLOWS PER FOOT(N)	CGI(PPM)	SAMPLE		Z. G.		133	WATER LEVEL	1	\$ 1 m	Appear areas of a page	washe danam sama and analysis of the	
			Ę	£ 55 5	<u>"</u>	HOFFLE	DATE	2/2 1/30°	S Anna ga	The second secon	geries or guardipension according	
]	WELL CONS CONS CONS	506n	<u>;</u> E	• HYLL	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	DESCRIPTION	, K	the training the t	
5, 11,	drive to peak change in	41 - 52 to 104	-34 -36	End Cap			SILTY CLAY; bro	wn, damp to n	Con and or gib your women to	AND TRANSPORT TO A STREET OF THE	n sellen ein sellen ble en stadige eine sellen s Sellen sellen	
12	Politica Control		38	The state of the s	i.C	, a ,	Boring termiated	at 36.5'				
	F 4 -		i'		3	• ,	* 3 .	Boring termiated at 36.5 Feet at approximately 26.5 feet				
,	;	The second of	- 40 - 42			e de la companya de l	below grade.	ericountere	a at approxim	(A.O.) 20.0 1001		
	2.2	- ~	- 44 - 46					i de company	The second papers	The post of	and the second s	
		* (*)	- 48 - 50			The state of the s		ি প্রক্রি	green, in 1940	i nicheta		
			: 		2 depth or .		') . ~ ±	* \ * * \$	on the stage	5 (13 (# 12 13)		
J.		1.	* . *:	Short of the second	, ė.,				The state of the s		thinks is selected the thinks owner a size of the selected	
							v-	· 编章	Maria Carlo	1840 J. T.A. M.	arion gr ow in	
		1		,	2			-	•	v - • •	ins the straight fight	
				Portlar	xd C	emen	Benton	ite Pellets	Sample		S. 3.	
				Sand				interval	Water lev	el enœuntered c	luring	



Appendix E

Well Completion Report Forms

STATE OF CALIFORNIA DWR WELL COMPLETION REPORT (WELL LOGS)

STATE OF CALIFORNIA DWR WELL COMPLETION REPORT (WELL LOGS)

STATE OF CALIFORNIA DWR WELL COMPLETION REPORT (WELL LOGS)

STATE OF CALIFORNIA DWR WELL COMPLETION REPORT (WELL LOGS)

STATE OF CALIFORNIA DWR WELL COMPLETION REPORT (WELL LOGS)