

# The State of New Hampshire

# DEPARTMENT OF ENVIRONMENTAL SERVICES



### Thomas S. Burack, Commissioner

February 13, 2014

Her Excellency, Governor Margaret Wood Hassan and The Honorable Council State House Concord, NH 03301

### REQUESTED ACTION

Approve Sprague Operating Resources request to perform the following work on the Piscataqua River, in Newington. File # 2013-02919. This project will not have significant impact on or adversely affect the values of the Piscataqua River.

Impact a total of 2,400 sq. ft. of shoreline and surface water of the Piscatagua River to replace an existing industrial access trestle pier within the same footprint and stabilize the shoreline with riprap including the following:

- a) impact 39 sq. ft. for the removal and replacement of the pier pilings and
- b) impact 2,361 sq. ft. (65 linear ft.) to stabilize the shoreline with riprap.

The Department imposed the following conditions as part of this approval:

- 1. All work shall be in accordance with plans by Appledore Marine Engineering dated October 2013, as received by the NH Department of Environmental Services (DES) on December 5, 2013.
- 2. Any further alteration of areas on this property that are within the jurisdiction of the DES Wetlands Bureau will require a new application and further permitting by the Bureau.
- 3. This permit does not allow dredging for any purpose.
- 4. Appropriate siltation/erosion/turbidity controls shall be in place prior to construction, shall be maintained during construction, and shall remain in place until the area is stabilized.
- 5. Work shall be done during low tide.
- 6. Work shall be conducted in a manner so as to minimize turbidity and sedimentation to surface waters and wetlands.
- 7. Work shall be conducted in a manner that avoids excessive discharges of sediments to fish spawning
- 8. Within three days of final grading or temporary suspension of work, all exposed soil areas shall be stabilized by seeding and mulching during the growing season, or if not within the growing season, by mulching with tack or netting and pinning on slopes steeper than 3:1.
- 9. Construction equipment shall be inspected daily for leaking fuel, oil and hydraulic fluid prior to entering surface waters or wetlands. Faulty equipment shall be repaired prior to entering jurisdictional areas.
- 10. The contractor shall have appropriate oil spill kits on site and readily accessible at all times during construction and each operator shall be trained in its use.
- 11. All refueling of equipment shall occur outside of surface waters or wetlands.

Telephone: (603) 271-3503 • Fax: (603) 271-6588 • TDD Access: Relay NH 1-800-735-2964

Her Excellency, Governor Margaret Wood Hassan and The Honorable Council Page 2

### **EXPLANATION**

The DES Wetlands Bureau approved this project on January 10, 2014. DES supported its decision with the following findings:

- 1. This is a major impact project per Administrative Rule Env-Wt 303.02(a), projects in tidal wetlands.
- 2. The need for the proposed impacts has been demonstrated by the applicant per Env-Wt 302.01. The industrial access trestle pier, which supports several product off-load pipelines, is severely deteriorated and needs to be replaced. Further, the shoreline is eroding where the pier structure meets the shoreline and needs to be stabilized
- 3. The applicant has provided evidence which demonstrates that this proposal is the alternative with the least adverse impact to areas and environments under the department's jurisdiction per Env-Wt 302.03. The pier will be replaced within the same footprint and will reduce the number of pilings needed from the existing 39 H-pilings to 28 new steel pilings. The rip rap is proposed to run with the contour of the existing slope and blend into the river bottom without extending out further than necessary to withstand the tidal power of the Piscataqua River.
- 4. The applicant has demonstrated by plan and example that each factor listed in Env-Wt 302.04(a) and (c), Requirements for Application Evaluation, has been considered in the design of the project. No species of concern were reported for the project vicinity by the NH Natural Heritage Bureau.
- 5. Compensatory mitigation is not required for this project, pursuant to Env-Wt 303.03(c)(2)c., as the project is to protect existing infrastructure including marine vessel access at an existing oil tank farm facility important to the public interest.
- 6. The Newington Conservation Commission recommends approval of the project.
- 7. DES conducted a field inspection of the project site on January 10, 2014, and found that the site conditions are accurately represented in the file.
- 8. In accordance with RSA 428-A:8, DES finds that the requirements for a public hearing do not apply as the permitted project is not of substantial public interest, and will not have a significant impact on or adversely affect the values of the tidal resource, as identified under RSA 482-A:1.

Application file documents are being forwarded to the Governor and Executive Council in connection with their consideration of this matter pursuant to RSA 482-A:3,II.(a) as it is a major project in public waters of the state.

We respectfully submit this request for your consideration.

Thomas S. Burack Commissioner

TSB/CGA/emk

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## THE STATE OF NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES LAND RESOURCES MANAGEMENT

WETLANDS BUREAU





# **WETLANDS PERMIT APPLICATION**

\$ 5,000.00

Page 1 of 6

	COMPLETE
Car a sea a physical chiphaga	CCT 2 4 2013 0CT 2 4 2013
	: :::AGEMENT
1 REVIEW	V TIME: Check the applicable box to indicate your review time. Refer to Guidance Document A for a summary of the minimum
	riteria to determine if your review time is Standard or Expedited.
Þ	Standard Review (Minimum, Minor or Major Impact)
2. APPLIC	ATION CHECKLIST: This checklist is provided to allow you to confirm all the required items are submitted.
note that ye	al next to each item below to confirm these items, required for administrative review, are included in your application. Please our application and accompanying items will be returned to you if the below items are not provided. Refer to the number in a next to each item for detailed instructions for completing that item.
x	Check for the application fee (no. 9A)
x	Completed application form with project description (no. 7) and required signatures (no.'s 10 & 13)
x	Completed U.S. Army Corps of Engineers New Hampshire Programmatic General Permit Appendix B (no. 9B)
×	Natural Heritage Bureau (NHB) report (no. 9C)
x	Is the project within a ¼ mile of a designated river? $\square$ Y $\boxtimes$ N. If yes, provide confirmation a copy of application sent to the Local Advisory Committee (no. 9D)
x	Color copy of a USGS map (no. 9E)
x	Photographs of the impact area (no. 9F)
x	Plans (no. 9G)
x	Copy of your tax map (no. 9H.1)
application.	Il next to each item to confirm that the following items, required for technical review, as applicable, are included in your Please note that if applicable items are not provided, you may receive a letter requesting outstanding items or your may be denied.
x	Abutters list and copies of certified mail slips (no. 9H.2)
x	Response to the two (2) minimum impact questions (no. 9I)
x	Attachment A - Response to the twenty (20) minor and major impact questions
x	Copies of comments, beyond the required NHB report, from NHB or the New Hampshire Fish and Game Department (NHFG) (no. 9C)
x	Mitigation Agreement Form and materials (no. 9J)
x	Date, time, contact information and a copy of notes for any pre-application meetings or correspondence with Wetlands Bureau Staff
x	Property Owner or Applicant permission, as required (no.'s 3 & 4)
x	Attachment B - Design Consideration & General Plan Requirements
x	Attachment C - Stream Crossing Requirements & Information
x	Function and Value Assessment

Wetlands Permit Application rev. 06/27/2013 Valid until 12/31/2013

3. PROPERTY OWNER INFORMATION				· · · · · · · · · · · · · · · · · · ·
NAME:				
TRUST / COMPANY NAME: Sprague Operat	ting Resources LLC			
MAILING ADDRESS: 2 International Drive,				_
TOWN/CITY: Portsmouth	- Cuito 200		STATE: NH	ZIP CODE: 03801
		PLIONE:	OTATE. TOT	Eli 0000.
EMAIL or FAX:		PHONE:		
ELECTRONIC COMMUNICATION: By initialing				e to this application electronically
		cated below to act in my beh request, supplemental infor		
Property Owner Signature			Date	
4. APPLICANT INFORMATION (if different				
NAME: Ted Reed				
COMPANY NAME:Sprague Operationg Re	sources LLC			
MAILING ADDRESS: Two International Driv				
TOWN/CITY: Portsmouth	STATE: NH		ZIP CODE: 0380	1
EMAIL: treed@spragueenergy.com		PHONE: 603-430-728	30	
ELECTRONIC COMMUNICATION: By initialing h	nere Thereby au	thorize DES to communicate	all matters relative	to this application electronically
APPLICANT PERMISSION: I hereby authorize the furnish upon request	=	act in my behalf as the agen in support of this permit app		of this application, and to
	Noah El	lwood, PE		
	Agen	nt name		
	$\triangle$	>		
Applicant's Signature  5. AGENT INFORMATION	<u> </u>		Date	
NAME: Noah Elwood, PE				
COMPANY NAME: Appledore Marine Engin	ecoring Inc			
MAILING ADDRESS: 600 State Street, Suite	<u> </u>			
TOWN/CITY: Portsmouth	STATE: NH		ZIP CODE: 03801	<u> </u>
EMAIL/FAX: nelwood@appledoremarine.c	om	PHONE: 603-766-187	0	
ELECTRONIC COMMUNICATION: By initialing h	ere Thereby auti	horize DES to communicate	all matters relative	to this application electronically

6. PROJECT LOCATION (A separate application must be filed with each municipality that jurisdictional impacts will occur in)										
ADDRESS: Sprague Operating Resources, River Road TOWN/CITY: Newington										
TAX MAP: 7		BLOCK:		LOT: 14	U	INIT:				
US GEOLOGICAL SURVI	US GEOLOGICAL SURVEY TOPO MAP WATERBODY NAME: Piscataqua River									
LOCATION COORDINATES (If known): 1212600.90, 225627.73 ☐ Latitude/Longitude ☐ UTM State Plane										
7. PROJECT DESCRIPTION: Provide a brief description of the project outlining the scope of work. Attach additional sheets as needed to provide a detailed explanation of your project. DO NOT reply "See Attached" in the space provided below or your application risks being returned as incomplete.										
The new structure of structure, but will rapplication seeks a pilings. New pilings stabilization will be  The removal of the	Replacement of an access trestle on the Piscataqua River. The existing structure (261'L x 22'W) will be removed. The new structure (261'L x 25'W) will be installed in the same location. The new design is similar to the existing structure, but will reduce the number of steel pilings from 39 H-pilings to 28 steel pipe pilings of 16" diameter. The application seeks a permit for work in a tidal river and the surface impacts for removal and installation of the pilings. New pilings will be mechanically driven below the mudline, and no dredging is proposed. Shoreline stabilization will be included in the area immediately around the first row of piles of the trestle.  The removal of the existing H-piles will require approximately 39 sf of surface disturbance. The installation of the new steel pipe piles will require approximately 39 sf of new surface disturbance.									
For each jurisdictional a Temporary = impact After-the-fact = work	ts that are not inten	ded to remain after	the project is co		e, linear feet of impa	ct				
	Permanent Sq. Ft	Permanent Lin. Ft.	Temporary Sq. Ft.	Temporary Lin. Ft.	After-the-fact Sq. Ft.	After-the-fact Lin. Ft.				
Forested wetland			_							
Scrub-shrub wetland										
Emergent wetland										
Wet meadow										
Intermittent stream		_				· ·				
Perennial stream / river										
Lake or pond						+				
Tidal water	2400				<del>-</del>					
Salt marsh		_				· ·				
Sand dune										
Prime wetland										
Prime wetland buffer										
Undeveloped Tidal Buffer Zone (TBZ)										
Previously-developed upland in TBZ										
Total:	2400				_					

Surface water dredge and beach replenishment, provide the cubic yards of material:	
Shoreline structures, provide the average shoreline frontage (linear feet), using the formula below:	
(Straight line distance pin to pin:) + (Actual natural navigable shoreline pin to pin) / 2 = 48 (See Figure 8 of Site Plans)	
Stream and river projects, provide the watershed size of the contributing watercourse:	
9 DELATED ELLES / List related files as appropriate (Mathematical Alternation of Torraine Substitution)	
8. RELATED FILES (List related files or approvals (Wetlands, Shoreland, Alteration of Terrain, Subsurface or other)	
9. APPLICATION REQUIREMENTS: This application and accompanying items will be returned to you if items outlined in A – H.1 are reprovided.	<u>iot</u>
A. Fee: Attach the application fee in the form of a check or money order payable to: "Treasurer-State of NH" (RSA 482-A:3,I & Env-V 505.01(c))	√t
Minimum Impact Fee (Standard & Expedited Review): Flat fee of \$ 200	
<u>OR</u>	
Minor or Major Impact Fee (Standard Review): Complete the application fee table below	í
Permanent imposts (non decking):	
Permanent impacts (non-docking): sq. ft. X \$0.20 =	
Temporary impacts (non-docking): sq. ft. X \$ 0.20 =	
Temporary (seasonal) docking structure:sq. ft. X \$1.00 =	
Permanent docking structure: 2400 sq. ft. X \$2.00 = 4800	
Projects proposing shoreline structures add \$200 =	
Total = 5000	
10tal =	
The Application Fee is the above calculated Total or \$200, whichever is greater = 5000	
<ul> <li>☑ B. Appendix B: Attach a completed U.S. Army Corps of Engineers New Hampshire Programmatic General Permit (PGP) Appendix         <ul> <li>Corps Secondary Impacts Checklist. Link: <a href="http://www.nae.usace.army.mil/Regulatory/SGP/NH_PGP.pdf">http://www.nae.usace.army.mil/Regulatory/SGP/NH_PGP.pdf</a></li> </ul> </li> </ul>	В
C. NHB Review: Documentation from the Department of Resources and Economic Development's Natural Heritage Bureau (NHB) indicating that NHB has reviewed your project. Documentation can be obtained online at: <a href="https://www2.des.state.nh.us/nhb">https://www2.des.state.nh.us/nhb</a> datacheck/ or by phone (603) 271-2215 x 323.	
Attach the REQUIRED letter/memo and map provided by NHB; and	
Provide copies of any additional comments received from NHB and/or the NHFG.	
Indicate species identified by the NHB Review:	
□ Designated Rivers:     □ Designated	
<ol> <li>Is the project within a ¼ mile of a designated river?  \[ \sum Y \omega N \]</li> </ol>	
Designated river list and map link: <a href="http://des.nh.gov/organization/divisions/water/wmb/rivers/desigriv.htm">http://des.nh.gov/organization/divisions/water/wmb/rivers/desigriv.htm</a>	
2. If yes: Indicate river: Piscataqua River is not listed as a designated river.	
<ol> <li>As required by RSA 482-A:3,I(d)(2), I have notified the Local River Advisory Committee (LAC) by sending a copy of the complete application and supporting materials via certified mail on: Month: Day: Year:</li> </ol>	
LAC link: <a href="http://des.nh.gov/organization/divisions/water/wmb/rivers/lac/index.htm">http://des.nh.gov/organization/divisions/water/wmb/rivers/lac/index.htm</a>	

⊠E	<u>USGS Map</u> : Attach a copy of a U. S. Geological Survey topographic map upon which the property lines and project limits have been outlined (surveyed property boundaries not required). The map must be at an <u>unaltered</u> scale of 1:24,000 or 1" = 2,000 feet (1:25,000 metric map). (Env-Wt 501.02(a)(4) & 505.01(g))
	Topographic Map Links: <a href="http://des.nh.gov/organization/divisions/water/wetlands/categories/technical.htm">http://des.nh.gov/organization/divisions/water/wetlands/categories/technical.htm</a>
<b>⊠</b> F.	Photographs: Attach legible and labeled color photographs clearly depicting the jurisdictional areas to be impacted, the resource outside of impact area, any shoreline structures and culvert inlet/outlets (Env-Wt 501.02(a)(3) & 505.01(i))
⊠G	Plans: Attach plans (Env-Wt 501.02). See Attachments B & C for detailed plan requirements.
⊠ н.	1. Tax Map: Attach a legible copy or tracing of the tax map from the municipal office (Env-Wt 501.02(a)(1)& 505.01(e))
If app DES	blicable items outlined in H.2 - J are not provided, you may receive a letter requesting the outstanding information. Please note that a request letter is a courtesy and applications that do not include the required information may be denied.
:	2. Abutter Notification: Confirm the submitted tax map illustrates the property of the applicant, the location of the proposed project on the property, and the location of properties of abutters (defined Env-Wt 101.03) with each lot labeled with the abutter's name(s) and mailing address(es); or provide a list of abutters' names and mailing addresses to cross-reference with the tax map (Env-Wt 501.02(a)(1)& 505.01(f))
	Exemption: Abutter notification shall not be required for logging operations, minimum impact agricultural projects, projects in utility rights-of-way, or public highway construction. (Env-Wt 501.01(c))
	Permission: If jurisdictional impacts occur within 20 feet of an abutting property line or imaginary extension thereof over surface water signed permission letter(s) from the affected abutters must be included with this application (Env-Wt 304.04). This letter must be notarized if your project is a boat docking facility (RSA 482-A:3-XIII(c)). Notarized abutter permission is not required for maintenance projects.
<b>⊠</b> 1.	Need and Minimization & Avoidance (Env-Wt 302.03, Env-Wt 302.04, 505.01):
	Minimum: Attach statements demonstrating:
	The need for the proposed project; and
	2. That the proposal is the alternative with the least adverse impact to areas and environments under the department's jurisdiction.
	-OR-
<u> </u>	Minor & Major: Attach statements is response to the 20 questions in Attachment B
<b>⊠</b> ] J.	Mitigation: Minor & Major Impact Projects ONLY: Does the project require compensatory mitigation? ☐Y ☒ N
	Projects that require mitigation are listed in section Env-Wt 302.03 and mitigation requirements in Chapter Env-Wt 800 of the Wetland Rules Env-Wt 100-900 Link: <a href="http://des.nh.gov/organization/commissioner/legal/rules/documents/env-wt100-900.pdf">http://des.nh.gov/organization/commissioner/legal/rules/documents/env-wt100-900.pdf</a>
	If yes: Attach a completed Mitigation Agreement Form and materials outlined on the form (Env-Wt 501.02(a)(6) & 501.06)  Link: <a href="http://des.nh.gov/organization/commissioner/pip/forms/wetlands/documents/mitigation_form.doc">http://des.nh.gov/organization/commissioner/pip/forms/wetlands/documents/mitigation_form.doc</a>
10. P	ROPERTY OWNER SIGNATURE (authorized applicant or agent signature acceptable with required permission(s) above; 3 & 4)
By sig	ning the application, I am certifying that:
1	All abutters have been identified in accordance with RSA 482-A:3, I and Env-Wt 100-900.
	I have read and provided the required information outlined in Env-Wt 302.04 for the applicable project type.  I have read and understand Env-Wt 302.03 and have chosen the least impacting alternative.
4.	Any structure that I am proposing to repair/replace was either previously permitted by the Wetlands Bureau or would be considered
	grandfathered per Env-Wt 101.44. I have submitted a copy of the application materials to the NH State Historic Preservation Officer.
	Link:http://www.nh.gov/nhdhr/review/
	l authorize DES and the municipal conservation commission to inspect the site of the proposed project.
	I have reviewed the information being submitted and that to the best of my knowledge the information is true and accurate.  I understand that the willful submission of falsified or misrepresented information to the New Hampshire Department of
	Environmental Services is a criminal act, which may result in legal action.
	I am aware that the work I am proposing may require additional state, local or federal permits which I am responsible for obtaining.
	The mailing addresses I have provided are up to date and appropriate for receipt of DES correspondence. DES will not forward returned mail.
	$\Lambda$
X	Ted Reed
⊔P⁄6	perty Owner / Authorized Applicant / Authorized Agent Print name legibly Date

#### 11. APPLICATION SUBMITTAL DIRECTIONS FOR APPLICANT

- If you are seeking expedited review, submit the original application form and accompanying items to the conservation commission for signature before submitting the application to the town/city clerk for mailing to DES. Standard review applications do NOT require conservation commission signature.
- All applications require the original application form and accompanying items, with four copies, application fee and any
  required municipal fees (authorized by RSA 482-A:3,I) are submitted to the town/city clerk for their required signature and
  mailing via certified mail to DES. Municipal fees means an administrative fee not to exceed \$10 plus the cost of postage by
  certified mail

#### 12. CONSERVATION COMMISSION SIGNATURE (Expedited review only)

Expedited review requires that the conservation commission's signature is obtained in the space below. Standard review applications do NOT require the conservation's commission's signature. The Conservation Commission signature should be obtained prior to submitting the original application and four copies to the town/city clerk for mailing to the DES. The Conservation Commission may refuse to sign. If the Conservation Commission does not sign this statement for any reason, then the application is not eligible for expedited review and the application will reviewed in the standard review time frame.

The signature below certifies that the municipal conservation commission has reviewed this application, and:

- 1. Waives its right to intervene per RSA 482-A:11;
- 2. Believes that the application and submitted plans accurately represent the proposed project; and
- 3. Has no objection to permitting the proposed work.

Authorized Commission Signature

Print name legibly

11/21/<u>[3</u> Date

#### 13. TOWN / CITY CLERK (All applications require this section to be completed by the Town/City Clerk)

As required by Chapter 482-A:3 (amended 1991), I hereby certify that the applicant has filed five application forms, five detailed plans, and five USGS location maps with the town/city indicated below and I have received and retained certified postal receipts (or copies) for all abutters identified by the applicant.

Town/City Clerk

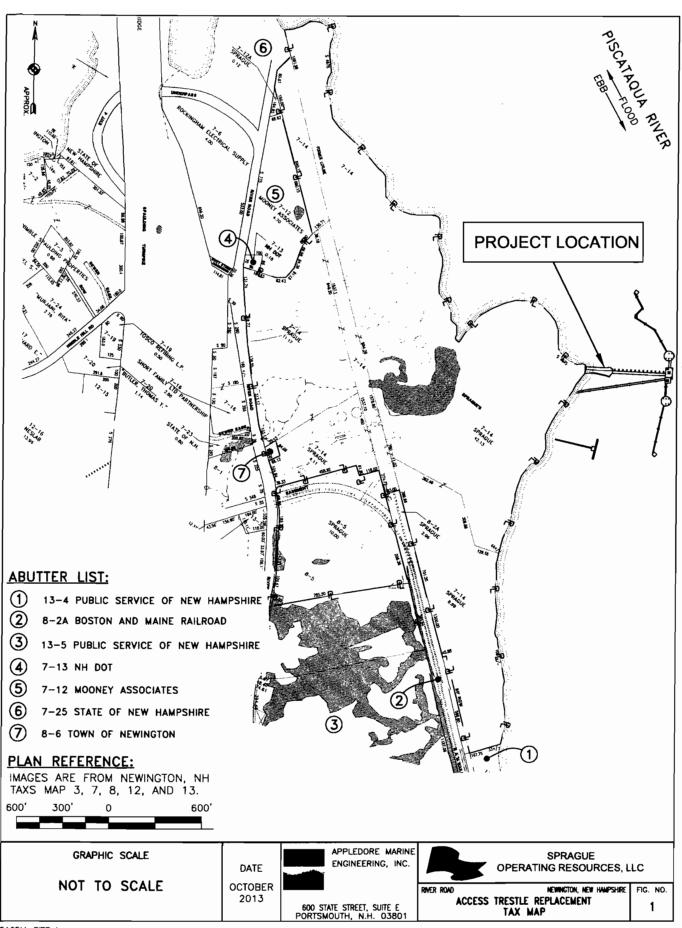
Print name legibly

Town/City

#### APPLICATION SUBMITTAL & MAILING DIRECTIONS FOR TOWN/CITY CLERK

### Per RSA 482-A:3,I(d):

- For applications where "Expedited Review" is checked on page 1, accept the application only if the Conservation Commission signature has been sought (Standard Review Applications do NOT require the Conservation Commission signature);
- Collect from the applicant the postal receipts demonstrating that all abutters and the Local Advisory Committee were sent proper notice;
- 3. Collect any administrative fees, not to exceed \$10 plus the cost of postage by certified mail (RSA 482-A:3,I).
- 4. Immediately sign the original application and four copies in the signature space provided in the space above;
- Retain one copy of the application form and all attachments that will remain with the town/city clerk and will be made reasonably accessible to the public;
- 6. Immediately distribute a copy of the application with attachments to the municipal Conservation Commission, the local governing body (Board of Selectmen or Town/City Council), and the Planning Board in accordance with RSA 482-A:3, I; and
- 7. IMMEDIATELY send (DO NOT HOLD FOR OTHER MUNICIPAL REVIEWS) the original application form and attachments and filing fee, by CERTIFIED MAIL to the NHDES Wetlands Bureau at the address indicated on the front of this application.







# **REFERENCE:**

USGS MAP

GRAPHIC SCALE

SCALE: 1"=2000'±

DATE OCTOBER 2013

APPLEDORE MARINE ENGINEERING, INC.

600 STATE STREET, SUITE E PORTSMOUTH, N.H. 03801



SPRAGUE OPERATING RESOURCES, LLC

FIG. NO.

RIVER ROAD

ACCESS TRESTLE REPLACEMENT
USCG TOPOGRAPHIC MAP



Luke Hurley To:

8 continental Drive Exeter, NH 03833

From: NH Natural Heritage Bureau

Re: Review by NH Natural Heritage Bureau of request dated 8/28/2013

> NHB File ID: NHB13-2615 Applicant: Sprague Operating Resources LLC

Date: 8/28/2013

Location: Tax Map(s)/Lot(s): 7-14

Newington

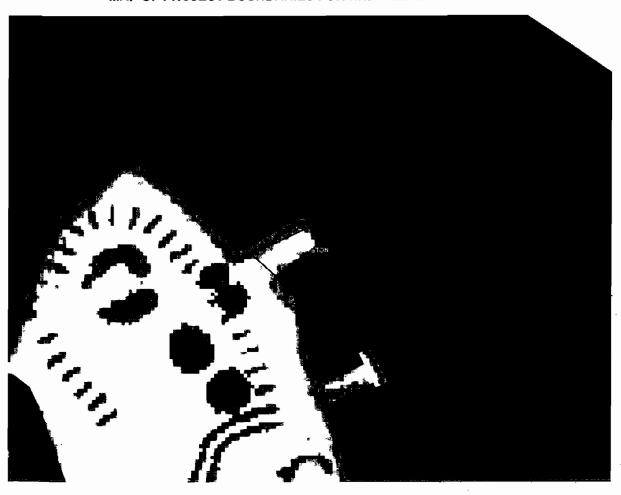
Project Description: Replacement of access trestle

The NH Natural Heritage database has been checked for records of rare species and exemplary natural communities near the area mapped below. The species considered include those listed as Threatened or Endangered by either the state of New Hampshire or the federal government. We currently have no recorded occurrences for sensitive species near this project area.

A negative result (no record in our database) does not mean that a sensitive species is not present. Our data can only tell you of known occurrences, based on information gathered by qualified biologists and reported to our office. However, many areas have never been surveyed, or have only been surveyed for certain species. An on-site survey would provide better information on what species and communities are indeed present.

This report is valid through 8/27/2014.

# MAP OF PROJECT BOUNDARIES FOR NHB FILE ID: NHB13-2615





# Abutter's List & Certified Mail Slips

### Subject Parcel:

7-14

Sprague Operating Resources LLC 2 International Drive, Suite 200 Portsmouth, NH 03801

### **Abutting Parcels:**

13-4

/ PSNH 780 N Commercial Street Manchester, NH 03101

8-2A

✓ B&M Railroad Guilford Transportation Springfield Terminal Railway Iron Horse Park, Attn: Tax Dept. N. Billerica, MA 01821

13-5

**PSNH** 

780 N Commercial Street Manchester, NH 03101

7-12

/ Mooney Associates

PO Box 106

Kittery Point, ME 03905-0106

7-25

/ State of New Hampshire ( DUT) 7 Hazen Drive

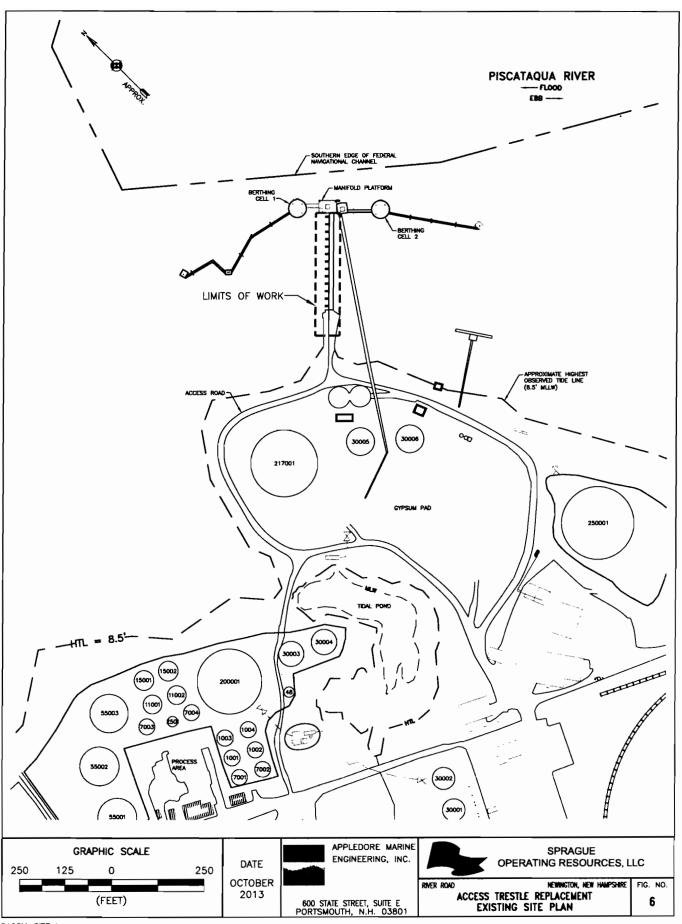
Concord, NH 03801

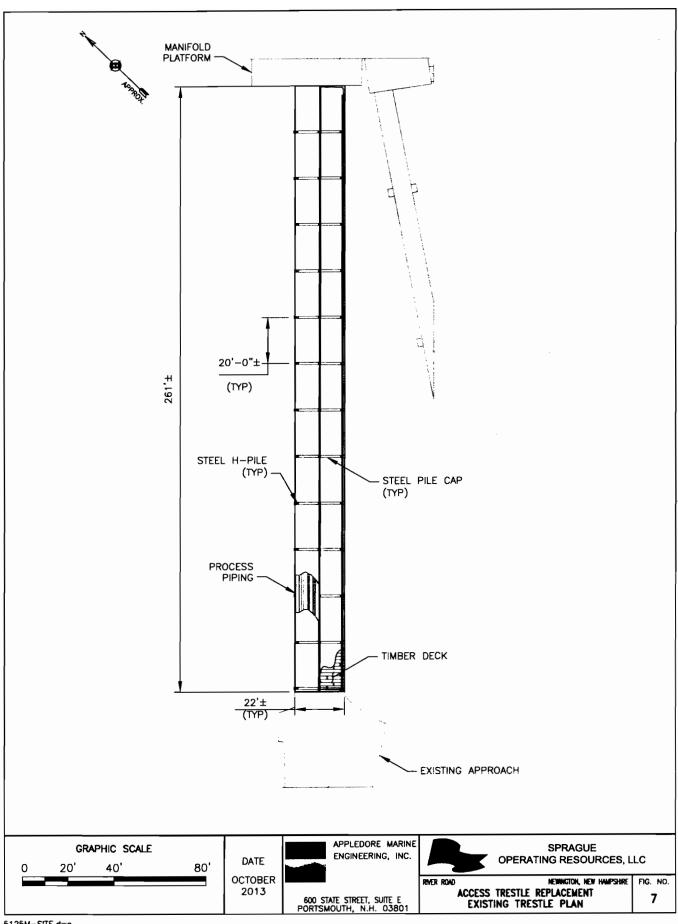
8-6

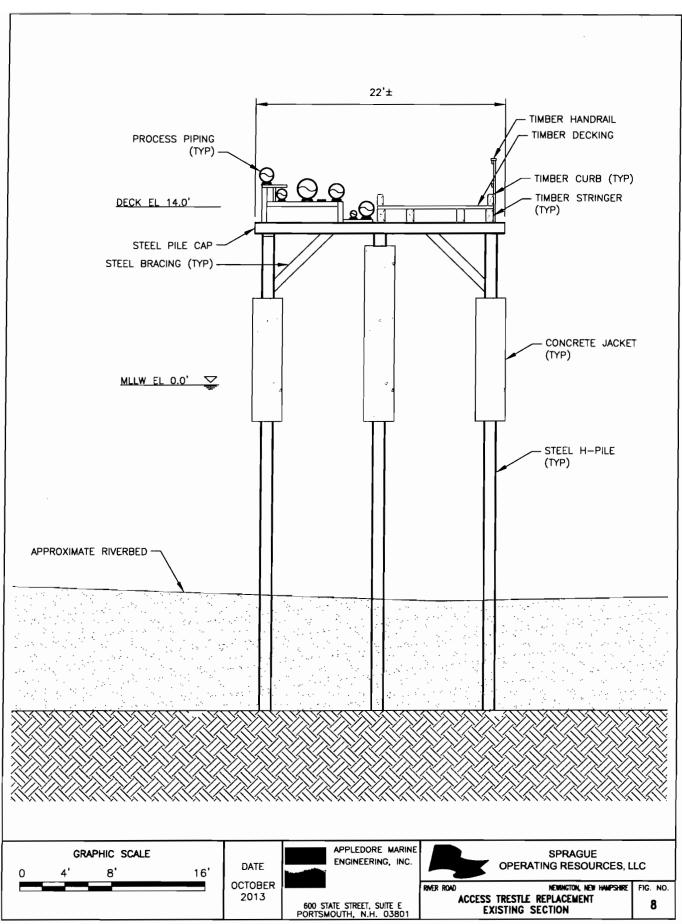
Town of Newington 205305 Nimble Hill Rd.

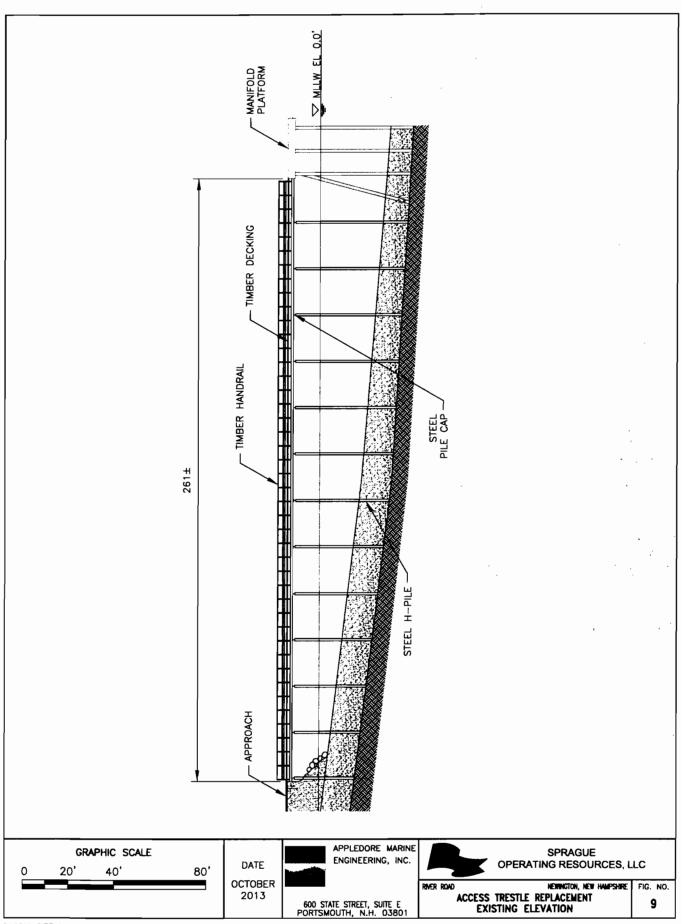
Newington, NH 03801

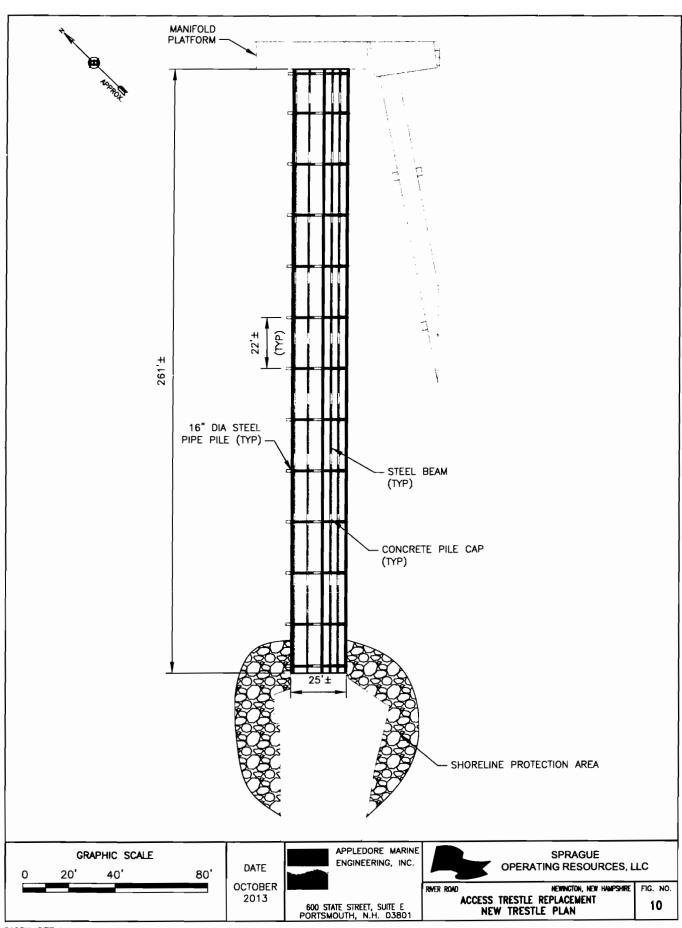
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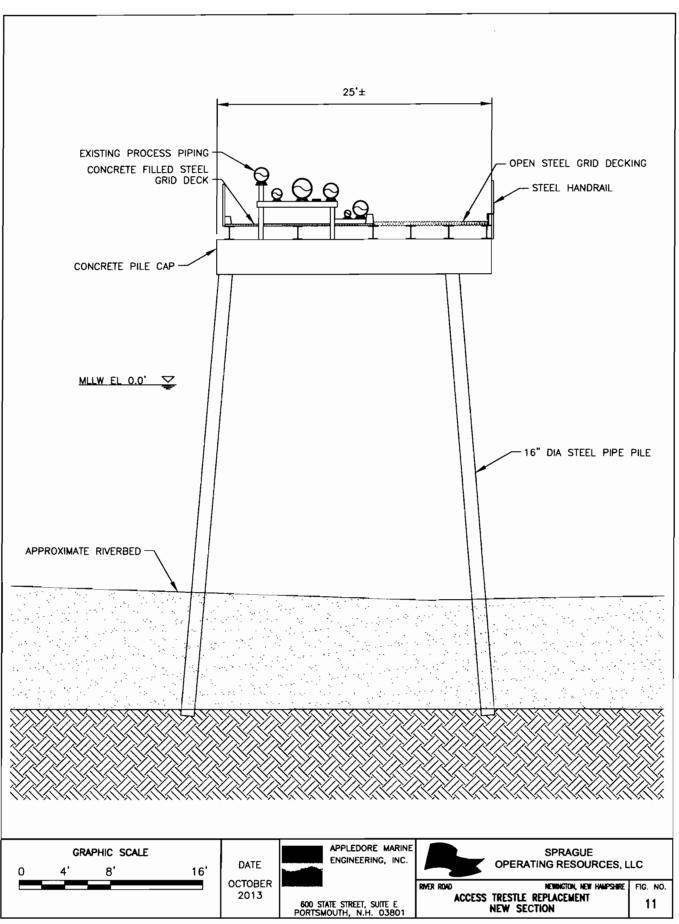


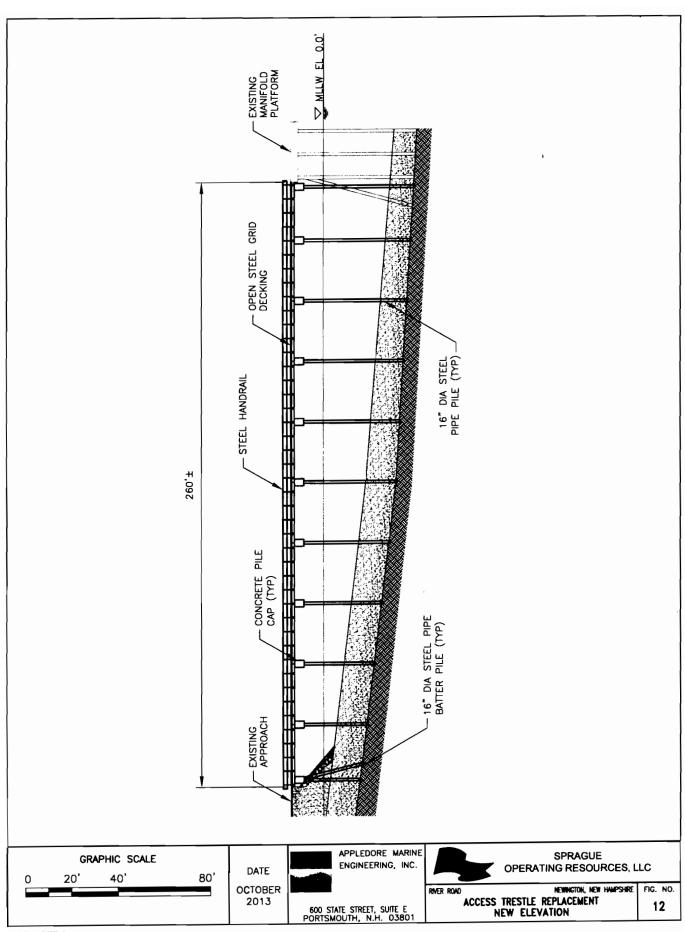












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