Brad Guarisco
Chief Surveillance and Enforcement Section
Regulatory Branch
New Orleans District
U.S. Army Corps of Engineers
Brad.A.Guarisco@usace.army.mil
Via email and regular mail

January 4, 2019

Re: Third Notice of Potential Permit Violations, Bayou Bridge Pipeline, LLC (MVN 2015-02295-WII)

Dear Mr. Guarisco,

Atchafalaya Basinkeeper and Gulf Restoration Network submit this Third Notice of Potential Permit Violations to the Corps' Regulatory Branch - Enforcement Section, identifying potential ongoing violations by Bayou Bridge Pipeline, LLC of the § 404 and § 408 permits issued by the Corps on December 14, 2017 (MVN 2015-02295-WII).

Atchafalaya Basinkeeper has identified additional, potential permit violations during on-site boat trips on the eastern portion of the Bayou Bridge Pipeline right-of-way, and monitoring overflights across the Basin in July – December, 2018. These violations include existing observations previously shared with the agency in our two prior Notice Letters, dated May 9 and June 1, 2018, but also identify additional potential permit violations for the Corps to address.

Monitoring Report:

On October 9, 2018, Atchafalaya Basinkeeper ("Basinkeeper") inspected approximately 5 miles of the Bayou Bridge pipeline right-of-way on the east side of the Atchafalaya Basin, moving west from the Gulf Intracoastal Waterway ("GIWW") by the Eastern Atchafalaya Guide Levee. Basinkeeper observed construction in high water, insufficient gaps in spoil, and number of dammed/blocked waterways. On October 12, 2018, Basinkeeper sent via email notification of these observations to the New Orleans District Corps' Enforcement Section, including corresponding coordinates and photographs taken by Dean Wilson, Executive Director and Basinkeeper, during the October 9, 2018 monitoring trip. The October 12, 2018, email to the Corps is attached hereto as Exhibit A. On October 18, 2018, Baisnkeeper sent a subsequent email to the Corps identifying that the blockage at Bayou Set was partially removed but that the waterway remained impassable. The correspondence included corresponding coordinates and a photograph taken on that day by Dean Wilson. The October 18, 2018, email to the Corps is attached hereto as Exhibit B.

On December 7, 2018, Atchafalaya Basinkeeper inspected the Bayou Bridge pipeline right-of-way from the GIWW along the eastern levee for about 8 miles west to Flat Lake Pass. On this date the water stage at Bayou Sorrel was 7.16' and rising. During this monitoring trip we observed four excavators actively digging in the high water. While these excavators were digging (as seen in Figures A-D below), we observed no erosion or sediment control measures in place, the mud was flowing freely into the wetlands and diesel oil presumably from the excavators could be seen as a sheen on the water.

Figure A: This photo was taken by Dean Wilson during the monitoring trip in the Basin on December 7, 2018. This photo was taken approximately 1.5 miles east of Flat Lake Pass. Approximate coordinates 30.08572778, -91.41138889. Figures A-C depict active construction in the area and a lack of erosion or sediment control measures in place.

Figure B: This photo was taken by Dean Wilson during the monitoring trip in the Basin on December 7, 2018. This photo was taken in the same location as Figure A. This photo depicts active construction in the area and again, a lack of erosion or sediment control measures in place.

Figure C: This photo was taken by Dean Wilson during the monitoring trip in the Basin on December 7, 2018. This photo was taken in the same location as Figures A and B above. This photo more clearly depicts the discharge of mud from construction.

Figure D: This photo was taken by Dean Wilson during the monitoring trip in the Basin on December 7, 2018. This photo was taken approximately 0.8 of a mile west of Cross Bayou. Approximate coordinates: 30.08656111, -91.39194444. This photo depicts diesel sheen on the water.

The elevated water level continues to raise concerns regarding construction in the Basin due to the enhanced capacity of the pipeline trench to channel high-volumes of sediment-laden water into the interior of the Basin, distributing sediment into productive swamps, elevating the natural ground and disrupting the hydrology of these areas. Construction during high water exacerbates this

process, and the failure to employ erosion/siltation protection measures during high water makes trenching, spoil piling and construction along the corridor a threat to water quality and hydrology. Construction without adequate consideration of water level and the implementation of sediment control measures accelerates siltation rates throughout the area, impacting wildlife habitat and navigability as well.

From October 25, 2018 to December 26, 2018, the Carrolton gage for the Mississippi River exceeded 11.00 feet. *See* Exhibit C attached hereto. Construction during these high water events exacerbates the harms to water quality and surrounding areas as more sediment is distributed into interior swamps. To the best of our knowledge and observation, Bayou Bridge continued to construct during this time. On October 9, 2018, the water was rising in the Basin, and Basinkeeper observed construction, what appeared to be trenching, in the pipeline right-of-way east of the Atchafalaya River. On October 17, 2018, to the best of our knowledge and observation, Bayou Bridge was still constructing, digging the trench, in sections of the right-of-way east of the Atchafalaya River. On October 30, 2018, the Carrolton gage reading was at 11.55 feet, and to the best of our knowledge and observation, Bayou Bridge continued construction on the east side of the Basin. On December 7, 2018, four days after the Carrolton gage exceeded 11 feet, and five days before the Carrolton gage again exceeded 11 feet, we observed Bayou Bridge constructing its pipeline on the east side of the Atchafalaya Basin. On December 19, 2018, the Carrolton gage read 12.54 feet, and to the best of our knowledge and observation, Bayou Bridge continued to construct on the east side of the Basin, and appeared to be digging in the high water, with some of the temporary spoil exposed, but a majority of which was overtopped with high water.

As noted in our May 9, 2018 Notice letter to the Corps, our June 1, 2018 Supplemental Notice letter to the Corps, and again reiterated herein, an issue of grave concern is the accelerated rate of sedimentation in these areas and the resulting impacts to the hydrology, particularly on the east side of the Basin. The Corps' 404 permit prohibits more than minimal damage to the hydrology of these wetlands. But as we are observing on the ground, these areas surrounding the construction activities are being significantly and negatively impacted due to the observed, ongoing failure to use sediment control measures and constructing during high water.

Additionally, during the monitoring trip on December 7, 2018, Basinkeeper identified a blocked/dammed waterway on the east side of the Basin approximately 1.3 miles west of Cross Bayou. Figure E below depicts the blocked waterway.

Figure E: This photo was taken by Dean Wilson during the monitoring trip in the Basin on December 7, 2018. This photo was taken at the following approximate coordinates: 30.08608056, -91.39916667. This photo depicts a waterway dammed by pipeline construction in this area.

The Corps' Permit prohibits the activity from interference with the public's right of free navigation of *all* navigable waters of the United States. *See* U.S. Army Corps of Engineers Permit # MVN-2015-02295-WII to Bayou Bridge Pipeline, LLC, at 4, (Dec. 14, 2017) (hereinafter, "BBP § 404 Permit") (emphasis added). The addition of sediment into navigable waters, elevating the water bottom, and the blockages of waterways from construction activities and debris impedes navigation.

During the monitoring trip on December 7, 2018, Basinkeeper also observed the presence of trash and debris left behind in the construction right-of-way.

Figure F: This photo was taken by Dean Wilson during the monitoring trip in the Basin on December 7, 2018. This photo was taken at the following approximate coordinates: 30.08576944, -91.41333333. This photo depicts trash and debris in the construction right-of-way being carried by the current into the wetlands. The presence of trash presumably left behind from construction can be found in various places along the right-of-way.

Additionally, in several areas across the pipeline right-of-way, it appears that the pipeline may have been constructed in existing spoil banks. The presence of spoil banks in the pipeline right-of-way and the depth of the pipeline's construction in the Basin has been a cause for concern since the Corps first noticed the public of the project in 2016. It is well documented that spoil piles interfere with the disposition of sediment, water flow and navigation, resulting in harms to surrounding swamps, wildlife habitat and commercial and recreational interests in the Basin. We reiterate this concern today to request that the Corps investigate whether the pipeline was has been buried at a sufficient depth so as to not interfere with future restoration projects as the Louisiana Department of Natural Resources raised during the public comment period[1], and so as to not make any pre-existing spoil banks permanent by laying pipe in the spoil and/or not at a sufficient depth below natural grade, which would not include any manmade spoil piles.

[1] U.S. Army Corps of Engineers Section 408 Permit Signed Permission Letter to Bayou Bridge Pipeline, LLC, at 11-12 (Dec. 14, 2017) (hereinafter, "BBP § 408 Permit").

Figure G: This Photo was taken by Dean Wilson on September 20, 2018. This photo was taken facing southeast along the pipeline right-of-way at approximately 30.11311944, -91.54972222. This photo depicts an existing spoil pile on the south side of the pipeline right-of-way, and pipeline markers on top of the spoil pile.

Applicable Permit Parameters & Conditions

The above-identified lack of erosion/siltation control measures, inadequate gaps in spoil and the hydrologic alternations as a result of construction activities, particularly during high water, present potential, additional ongoing violations by Bayou Bridge Pipeline, LLC of its Section 404 permit conditions.

> General condition No. 2 states in pertinent part: "You must maintain the activity authorized by this permit in good condition and in conformance with the terms of this permit." *BBP § 404 Permit,* at 1.

As indicated above and in our May 9 and June 1, 2018 Notice letters, Bayou Bridge is neither maintaining the activity in good condition in light of the exacerbated sedimentation in areas on the east side of the Basin, high water levels during construction and ungapped spoil piles on the west side of the Basin, nor is the company acting in conformance with the terms of the Permit.

> Special condition No. 9 provides that "[t]he permitted activity must not interfere with the public's right to free navigation on all navigable waters of the United States." *BBP § 404 Permit*, at 4.

Exacerbated sedimentation and distribution of sediments into navigable bayous, canals and other waterways due in part to Bayou Bridge's failure to implement adequate sediment control measures to protect hydrologic conditions and depth interferes with the public's right of free navigation in these previously navigable areas. As noted above and shown in Figure E, construction of the pipeline has blocked waterways, impeding navigation and interfering with interstate commerce.

The New Orleans District of the U.S. Army Corps of Engineers authorized construction of the Bayou Bridge Pipeline pursuant to Section 14 of the Rivers and Harbors Act of 1899, 33 U.S.C. § 408, provided that Bayou Bridge Pipeline, LLC complies with certain conditions, including Condition m as provided below:

> Open excavations must be backfilled, and drilling operations ceased 5 days prior to anticipated landfall of any high river event, tropical storm or hurricane. A high river event is defined by Carrolton gage reading of +11 feet or higher. **No waiver will be granted.** *BBP § 408 Permit*, at 5.

As described infra, the Carrolton gage reading exceeded 11.0 feet on more than 45 days between October 25 and December 26, 2018. Construction during a high river event contributes to more movement of sediment, particularly without sediment control measures in place to mitigate. To date the water levels remain high and to our knowledge, no waiver has been granted nor has the Corps demanded that construction cease despite the Carrolton gage reading having surpassed 11.0 feet for over 45 days, nor for the several days leading up to the crest above 11.0 feet and the interim dates during which the gage read at or above 10.0 feet and rising. Per the above-referenced condition to the BBP § 408 Permit, open excavations **must** be backfilled and drilling operations ceased at least 5 days prior to any high river event. Therefore, construction should have ceased as early as October 20, 2018, and throughout the months following until the high river event was anticipated to recede, which has yet to occur. Any open trenches that were not backfilled on or before October 20, 2018, or any ongoing drilling operations after October 20, 2018, were in violation of this very important permit condition.

> Special condition No. 12 provides in pertinent part: "The authorized activities *must* not cause more than minimal changes to the existing hydrologic conditions and flow characteristics in wetland areas or cause more than minimal degradation of water quality of any stream." *BBP § 404 Permit,* at 4 (emphasis added).

Again, as indicated in above, construction activities have significantly altered the existing hydrologic conditions across the Basin. This is in large part due to allowance of construction during high water and the lack of sediment control measures employed during construction.

> Special condition No. 13 states in pertinent part that "[a]ll work *shall* be done in accordance with the approved plans and confined to the permitted work area represented within the attached drawings." *BBP § 404 Permit,* at 4 (emphasis added).
>
> Special condition No. 20 provides that, "to avoid potential disruption and impediment to natural watercourses or hydrologic exchange along the authorized pipeline route during construction, to the greatest extent practicable, the permittee *shall* maintain an approximate 50 foot gap for approximately every 500 feet of temporary side cast material resulting from pipeline trench activities." *BBP § 404 Permit,* at 5 (emphasis added).
>
> Special condition No. 21 requires the permittee to implement "adequate erosion/siltation control measures to ensure that no sediment or other activity related debris is allowed to enter waters of the state." *BBP § 404 Permit*, at 5.
>
> Not also that Condition ss in the Section 408 Permit also requires the permittee to implement "temporary sediment control measures at the federal project and easement crossings, such as silt fences, to minimize the introduction of sediment into waterbodies during construction and minimize the movement of spoil and sediment from surface runoff during and after construction." *BBP § 408 Permit*, at 10.

We have again failed to identify any temporary sediment control measures or barriers (silt fences, straw bales, etc.) put in place by the company to protect pre-project hydrologic conditions and flow characteristics around the right-of-way in the Basin. Moreover, in some areas there is a complete lack of gaps in the spoil of temporary side cast material, and in others (such as that detailed in the October 12, 2018 email to the Corps and attached hereto as Exhibit A) the gaps that are present do not comply with the requirements at special condition No. 20, blocking navigability and impairing water quality and sediment disbursement. These measures were particularly important in light of the excessive water levels the Basin has experienced from the months of October through December, 2018, as a result of rain-events in the Mississippi River Valley and local rainfall, in conjunction with the annual water rise.

Similarly, proper siltation control measures, such as building a berm where the right-of-way and Gulf Intracoastal Waterway intersect, employed in advance of the annual water rise in the Basin could have protected the navigability surrounding waterways and cypress swamps from the exacerbated sedimentation. At a minimum, the Corps should assess how to remediate the affected

areas to remove excessive sediment and restore pre-construction hydrology as required by the permits and accompanying Environmental Assessments.

Finally, there is concern that the pipeline may have been constructed into existing spoil piles at various points along the right-of-way in the Basin. The Environmental Assessment accompanying the Section 404 Permit contains the following applicable language:

> In regards to the recommendations that the applicant not install the pipeline within existing spoil banks along the proposed ROW within the Atchafalaya Basin ..., the applicant has stated that the pipeline will be installed in a manner and to a sufficient depth so as to not disrupt natural water flows in the basin. ***The applicant is not proposing to install the pipeline within any of the spoil banks, but is proposing to install it 4 feet below natural grade and would thus not preclude future spoil bank removal projects.*** Also, the proposed project will not involve the placement of excavated material on existing spoil banks which parallel the pipeline right-of-way. All excavated materials placed in temporary spoil piles in the workspace will be replaced in the trench and the area restored to pre-construction contours, which will not exacerbate existing flow conditions or preclude future spoil bank restoration activities.
>
> *See* U.S. Army Corps of Engineers, "Memorandum for Record" 404 Environmental Assessment, # MVN-2015-02295-WII (Dec. 14, 2017) (hereinafter, "BBP § 404 EA") (emphasis added).

However, despite such assurances from BBP that it will not install the pipeline within any existing spoil bank, we have observed pipeline markers on existing spoil (see Figure G *infra*) in areas particularly on the west side of the Atchafalaya Basin. In light of the many concerns raised during the permit comment period with respect to spoil piles and the depth of pipeline construction, it is important that the Corps investigate whether these assurances that the Corps relied on in making its determination of no significant impact and issuing the permit have in fact been followed.[2]

Despite repeated assurances from the Corps and the company of the minor impact construction and clearing will have on the Basin, and the many claims by Bayou Bridge that its construction activities comply with permit requirements, it is evident from monitoring efforts on the ground that tree-clearing, channel dredging and trenching, spoil piles and blockages, and construction in high water have very real, significant adverse effects on the Basin's ecosystems and hydrology.

In light of the identified potential permit violations by Bayou Bridge Pipeline, LLC in our May 9, 2018 Notice letter, June 1, 2018 Supplemental Notice letter, and January 4, 2019 Third Notice Letter, we respectfully request that the Corps' enforcement section consider the following actions:

1. Inspect the locations identified in all three Notice letters to ascertain whether Bayou Bridge Pipeline, LLC has complied with the terms of the Permit(s) (*BBP § 404 Permit,* at 2, General condition No. 6), or in the event Bayou Bridge Pipeline, LLC has failed to abide by such conditions, invalidate the authorization and permission or determine whether it has violated the law (*BBP § 408 Permit*, at 2, 7 and 8, Conditions b, dd, ff and jj);

2. Reevaluate the permit decision warranted under the circumstances, including alleged failure to comply with the terms and conditions of the Permits, and the introduction of significant new information regarding the accelerated rate of sediment distribution and hydrologic alterations in the project area (*BBP § 404 Permit,* at 3, #5(a), (c));

[2] Note that the Section 404 Permit provides at Special Condition no. 4 that "[t]he determination of this office that issuance of this permit is not contrary to the public interest was made in reliance on the information you provided." *BBP § 404 Permit,* at 3. Furthermore, the accompanying Environmental Assessment states that "[s]ignificant secondary and cumulative impacts are not anticipated ***provided*** the applicant adheres to the special conditions in the Department of the Army permit." *BBP § 404 EA*, at 58. (emphasis added). The Corps made assumptions of compliance in determining that the project would not result in more than minimal impacts to the health of the environment and public interest. To the extent that these conditions are not complied with, or the assumptions relied upon were not followed, including the depth of the pipeline or assurance not to construct in existing spoil, the impacts are significant. It is incumbent upon the Corps to investigate issues of noncompliance and take reasonable measures to address the resulting harms.

3. Suspend, revoke or enforce the Permit in accordance with procedures contained in 33 C.F.R. §§ 325.7, 326.4, 326.5, including costs for corrective measures (*BBP § 404 Permit*, at 3);

4. Stop pipeline construction during the present high river event as required by condition m to the Section 408 Permit; and

5. Conduct a full assessment of the damage to the Atchafalaya Basin and require restoration of the damaged site(s) or other appropriate remedial action. (*BBP § 408 Permit*, at 2, Condition b).

Continued non-compliance with the Permit contributes to the ongoing harms, continually disrupting the distribution of sediments, permanent degradation of wetlands, impeding navigation and impairing water quality and wildlife habitat across the Atchafalaya Basin. The conduct that we have observed in the Basin is unprecedented – construction with such disregard for the water level, distribution of sediment and critical permit conditions creates a dangerous precedent we can ill-afford. We strongly encourage the Corps initiate, or continue, an investigation into the above-articulated concerns, and take necessary steps to curtail and mitigate ongoing harms, prevent future harms, restore impacted areas and enforce the Clean Water Act and applicable permits, including assessing penalties and requiring any additional, appropriate measures to comply with the law.

We appreciate your time and consideration of these concerns. Please notify us upon any action taken in response to our three Notification letters.

Respectfully submitted by,

Misha Mitchell

Misha L. Mitchell, SBN: 37506
Atchafalaya Basinkeeper, *Staff Attorney*
P.O. Box 410
Plaquemine, LA 70765
Phone: (225) 692-1133
Fax: (205) 718-7683
Email: Basinkeeperlegal@gmail.com

On behalf of the following:

Dean A. Wilson
Basinkeeper and Executive Director
Atchafalaya Basinkeeper

Scott Eustis
Coastal Wetland Specialist
Gulf Restoration Network

EXHIBIT A

Gmail Misha Mitchell <basinkeeperlegal@gmail.com>

BBP possible violations and more.

Basinkeeper <enapay3@aol.com> Fri, Oct 12, 2018 at 2:26 PM
To: brad.a.guarisco@usace.army.mil
Cc: gutierrez.raul@epa.gov, basinkeeperlegal@gmail.com, scott@healthygulf.org, jmeche44@hotmail.com, julie.rosenzweig@sierraclub.org

Hello Brad,

On Tuesday October 9, 2018, Atchafalaya Basinkeeper inspected approximately 5 miles of construction along the Bayou Bridge Pipeline right-of-way on the east side of the Atchafalaya Basin, moving west from the Gulf Intercoastal Waterway by the Eastern Atchafalaya Levee.

The name on the excavators is DEAN. In places the company was digging in water, with rivers of mud cascading from the bucket and floating all over the place. The damage to the wetlands by digging during high water is hard to describe and impossible to quantify. Some Gaps were kept but many of them were 10 to 20 feet and very far apart (special condition No. 20 to the permit requires 50 foot gaps for every 500 feet of temporary side cast material). Many waterways and small bayous were dammed including Bayou Set, which has become impassible.

Coordinates: 30° 05'25.78" N 91° 19'37.20" W

Another small unnamed bayou was dammed 12,000 yards west of Cross Bayou.

Coordinates: 30° 05'12.53" N 91° 23'18.83" W

The following images depict the damming of these bayous, the excavator at work, and the lack of appropriate gaps within the elevated spoil banks along the pipeline right-of-way.

Picture of Bayou Set dam

Excavator digging

Spoil bank, no gaps

Unnamed bayou dam

Another waterway dammed

In response to our May 9, 2018 and June 1, 2018 Notice Letters sent to the Corps documenting a number of potential permit violations as a result of construction of the Bayou Bridge Pipeline in the Basin (attached below for reference), and in consideration of the ongoing issues observed and described above pertaining to pipeline construction in the Atchafalaya Basin, we inquire as to whether the Corps is investigating these potential violations or is otherwise working to address permit compliance in any way. Please let us know what actions have been taken to address these documented, potential permit violations and compliance concerns regarding the Bayou Bridge Pipeline project.

Thank you for your time and we look forward to hearing back from you soon.

Dean

Dean A. Wilson
Atchafalaya Basinkeeper
Executive Director
Office: 225-685-9439
Cell: 225-692-4114

What evil needs the most to succeed is for good men and women to do nothing

EXHIBIT B

Gmail

Bayou Set impassible

Basinkeeper <enapay3@aol.com>
To: brad.a.guarisco@usace.army.mil, gutierrez.raul@epa.gov
Cc: basinkeeperlegal@gmail.com, basinkeeper@gmail.com, jmeche44@hotmail.com, scott@healthygulf.org

Hello Brad,

The Bayou Set dam was partially removed but is still impassible. At this water stage Bayou Set was about 3' deep at that location. Some spoil was left, the bayou is not as wide as it should be and le is the case I want to thank you. Commercial fishermen and one swamp tour company need access to the bayou.

Coordinates: 30° 05'25.78" N 91° 19'37.20" W

Please call me any time if we can help in any way or if you have any questions.

Thank you,

Dean

Dean A. Wilson

Atchafalaya Basinkeeper
Executive Director
Office: 225-685-9439
Cell: 225-692-4114

What evil needs the most to succeed is for good men and women to do nothing

EXHIBIT C

Historic Data For Mississippi River at New Orleans (Carrollton) (01300)

Stream Name: Mississippi River
Gage Zero: 0 Ft. Gage
Flood Stage: 17 Ft.
Record High Stage: 21.27 Ft.

Longitude: -90.13611111
Latitude: 29.93472222

River Mile: 102.8
Record High Stage Date: 04/25/1922

Location of Gage:

Corps of Engineer's dock on left descending bank at river mile 102.8. Natural flow is affected by tides.

Adjustment for vertical datum NAVD88: -0.79 ft.
(e.g. for data relative to NAVD88 subtract 0.79 ft.)

LWRP 2007 (Low Water Reference Plane) has been defined with respect to NAVD88, corrections valid as of Sept 20, 2011.

** Raw data, subject to change **

08:00 Central

Date / Time	Stage (Ft)
9/1/2018 8:00	4.39
9/2/2018 8:00	4.36
9/3/2018 8:00	4.49
9/4/2018 8:00	4.69
9/5/2018 8:00	4.95
9/6/2018 8:00	4.41
9/7/2018 8:00	4.02
9/8/2018 8:00	3.94
9/9/2018 8:00	3.73
9/10/2018 8:00	3.8
9/11/2018 8:00	3.73
9/12/2018 8:00	3.96
9/13/2018 8:00	4.12
9/14/2018 8:00	4.19
9/15/2018 8:00	4.25
9/16/2018 8:00	4.6
9/17/2018 8:00	5.22
9/18/2018 8:00	5.71
9/19/2018 8:00	6.18
9/20/2018 8:00	6.64
9/21/2018 8:00	6.8
9/22/2018 8:00	6.94
9/23/2018 8:00	7.21
9/24/2018 8:00	7.49
9/25/2018 8:00	7.72
9/26/2018 8:00	8.08
9/27/2018 8:00	8.39
9/28/2018 8:00	8.6

9/29/2018 8:00	8.82
9/30/2018 8:00	8.98
10/1/2018 8:00	9.11
10/2/2018 8:00	9.22
10/3/2018 8:00	9.33
10/4/2018 8:00	9.19
10/5/2018 8:00	9.24
10/6/2018 8:00	9.42
10/7/2018 8:00	9.42
10/8/2018 8:00	9.68
10/9/2018 8:00	10.06
10/10/2018 8:00	10.56
10/11/2018 8:00	10.16
10/12/2018 8:00	9.81
10/13/2018 8:00	9.77
10/14/2018 8:00	9.71
10/15/2018 8:00	9.53
10/16/2018 8:00	9.46
10/17/2018 8:00	9.19
10/18/2018 8:00	9.25
10/19/2018 8:00	9.13
10/20/2018 8:00	9.21
10/21/2018 8:00	9.55
10/22/2018 8:00	9.98
10/23/2018 8:00	10.38
10/24/2018 8:00	10.91
10/25/2018 8:00	11.45
10/26/2018 8:00	11.5
10/27/2018 8:00	11.57
10/28/2018 8:00	11.53
10/29/2018 8:00	11.53
10/30/2018 8:00	11.55
10/31/2018 8:00	11.48
11/1/2018 8:00	11.73
11/2/2018 8:00	10.94
11/3/2018 8:00	10.54
11/4/2018 8:00	10.32
11/5/2018 8:00	10.25
11/6/2018 8:00	10.25
11/7/2018 8:00	10.29
11/8/2018 8:00	10.57
11/9/2018 8:00	10.82
11/10/2018 8:00	11.23
11/11/2018 8:00	11.45
11/12/2018 8:00	11.67
11/13/2018 8:00	12.08
11/14/2018 8:00	12.21
11/15/2018 8:00	12.32

11/16/2018 8:00	12.44
11/17/2018 8:00	12.43
11/18/2018 8:00	12.53
11/19/2018 8:00	12.59
11/20/2018 8:00	12.48
11/21/2018 8:00	12.53
11/22/2018 8:00	12.44
11/23/2018 8:00	12.37
11/24/2018 8:00	12.47
11/25/2018 8:00	12.45
11/26/2018 8:00	12.22
11/27/2018 8:00	11.9
11/28/2018 8:00	11.79
11/29/2018 8:00	11.55
11/30/2018 8:00	11.45
12/1/2018 8:00	11.6
12/2/2018 8:00	11.35
12/3/2018 8:00	10.99
12/4/2018 8:00	10.67
12/5/2018 8:00	10.32
12/6/2018 8:00	10.16
12/7/2018 8:00	10.02
12/8/2018 8:00	10.23
12/9/2018 8:00	10.29
12/10/2018 8:00	10.48
12/11/2018 8:00	10.73
12/12/2018 8:00	11.12
12/13/2018 8:00	11.63
12/14/2018 8:00	12.25
12/15/2018 8:00	12.17
12/16/2018 8:00	12.21
12/17/2018 8:00	12.17
12/18/2018 8:00	12.4
12/19/2018 8:00	12.54
12/20/2018 8:00	12.58
12/21/2018 8:00	12.3
12/22/2018 8:00	12.17
12/23/2018 8:00	12.05
12/24/2018 8:00	12.08
12/25/2018 8:00	12.17
12/26/2018 8:00	12.15