

CONSUMER DEFENSE GROUP ACTION

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Amended 60 Day Notice of Intent to Sue BP America, Inc. and Atlantic Richfield Company Under Health & Safety Code Sections 25249.5 and 25249.7

Consumer Defense Group Action, a California corporation (hereinafter "CDG" or the "Noticing Party") hereby gives Notice of Intent to Sue Under Health & Safety Code Section 25249.5 (the "Notice") to Robert A. Malone, President of BP America, Inc. and Atlantic Richfield Company, a wholly owned subsidiary of BP America, Inc. (hereinafter referred to collectively as "ARCO"), as well as the governmental entities on the attached proof of service. The Noticing Party must be contacted through its attorney, Anthony G. Graham, of Graham & Martin, LLP, 950 South Coast Drive, Suite 220, Costa Mesa, California 92626.

Summary of Violation

This Notice is intended to inform ARCO that it is in violation of Proposition 65, the Safe Drinking Water and Toxic Enforcement Act (commencing with Health & Safety Code Section 25249.5) (hereinafter "Proposition 65"). Proposition 65 absolutely prohibits any business from contaminating the drinking water supplies of California. ARCO is in violation of Proposition 65 because it has and is knowingly and intentionally threatening to "release chemicals known to the State of California to cause cancer or reproductive toxicity into water or onto or into land where such chemical passes or probably will pass into any source of drinking water," at each of the facilities listed on Exhibit A hereto (hereinafter "the Facilities"), which are ARCO branded gasoline stations with underground storage tank systems. Health & Safety Code Section 25249.5 and 25249.7. Proposition 65 provides that when a party, such as ARCO, an entity with more than ten employees, has been and is knowingly and intentionally threatening to "release chemicals known to the State of California to cause cancer or reproductive toxicity into water or onto or into land where such chemical passes or probably will pass into any source of drinking water," it is violating Health & Safety Code Section 25249.5 and may be enjoined from such conduct pursuant to Health & Safety Code Section 25249.7. The chemicals which ARCO is threatening to release are benzene and toluene ("the Designated Chemicals"), which are contained in the gasoline and other refined petroleum products which ARCO markets and stores within underground storage tank systems owned and/or operated by ARCO located at the Facilities. In order to be in compliance with Proposition 65, ARCO must effectively contain the Designated Chemicals in a UST system that is "product tight." For these purposes, "product tight" means that the operations must be impervious to the liquid and vapor of the substance ("the Designated Chemicals") that is or are contained or to be contained, in the underground storage tank systems so as to prevent seepage of the Designated Chemicals from the containment and in to or on to the ground where the Designated Chemicals will pass or probably will pass into any source of drinking water.

The Violation

ARCO markets gasoline and other refined petroleum products (hereinafter referred to as "gasoline") to both consumers and retailers. Gasoline is marketed under the ARCO trademark directly to motorists at ARCO branded retail outlets in California and elsewhere. ARCO owns and/or operates

numerous underground storage tank systems located at the Facilities that are used for the storage of gasoline offered for sale by ARCO to the general public. The operation by ARCO of the underground storage tank systems located at the Facilities, as well as the delivery, storage and dispensing of gasoline at the Facilities, as currently controlled and managed by ARCO, poses a substantial threat of discharge of gasoline and other refined petroleum products “into water or onto or into land where such chemical passes or probably will pass into any source of drinking water”.

All water within the State, including groundwater, is the property of the people of the State of California. California Water Code §§ 102 and 104. As to all water, the Legislature of the State of California (“the Legislature”) has determined that “the people of the State have a primary interest in the conservation, control and utilization of the water resources of the state, and that the quality of all waters of the State shall be protected for use and enjoyment of the people of the state.” California Water Code § 13000. Under Proposition 65 a “source of drinking water” is not confined to existing drinking water supplies. Rather, a “[s]ource of drinking water means either a present source of drinking water or water which is identified or designated in a water quality control plan adopted by a regional board as being suitable for domestic or municipal uses [and] also includes water identified in a regional board’ water quality control plan as being suitable for domestic or municipal uses.” Health & Safety Code §25249.10 (d). The “source of drinking water” into which the Designated Chemicals “probably will pass” are identified on Exhibit A hereto for each specific Facility.

Gasoline contains a number of constituents and additives each of which separately, as well as in combination, present a significant risk to human health, safety and the environment. The gasoline marketed by ARCO contains the chemicals Benzene and Toluene. Benzene is a clear, colorless, highly reactive flammable liquid derived from petroleum and contained in gasoline. Benzene is a chemical known by the State of California to cause cancer and has been listed as such pursuant to Proposition 65. Toluene is a colorless flammable liquid obtained from coal tar or petroleum and contained in motor vehicle fuels. Toluene is a chemical known by the State of California to cause reproductive toxicity and has been listed as such pursuant to Proposition 65. Hereinafter benzene and toluene are referred to as the “Designated Chemicals”.

The gasoline service station operations undertaken at the Facilities are not “product tight” (i.e. the operations are not impervious to the liquid and vapor of the substance that is contained, or is to be contained, in the underground storage tank systems so as to prevent seepage of the Designated Chemicals from the containment and into the ground) and thus are threatening to cause a discharge of Designated Chemicals. The following are the components of the gasoline service station operations that pose a threat of discharge of Designated Chemicals: the underground tank(s) and underground storage tank system(s); the pipes used in connection with the storage of the Designated Chemicals in the USTs, including connecting pipes, vapor recovery lines, vent lines and associated fittings as well as the associated secondary containment systems; the drainage systems which collect surface water run off from the petroleum dispensing and delivery areas; secondary containment and spill control systems, including but not limited to secondary containment for the underground tank system, pipe, connecting pipe, dispensers and dispenser piping and the petroleum delivery area, as well as for the drainage systems which collected surface water run off from the dispensing and delivery area.

At the Facilities, the gasoline containing Designated Chemicals is stored in one or more underground storage tank(s) and an underground storage tank system (hereinafter referred to collectively as “the USTs”), which includes, but is not limited to, one or more tanks, including the piping connected thereto. The pipes used in connection with the storage of the Designated Chemicals in the USTs includes but is not limited to valves and other appurtenances connected to the pipe, pumping units, fabricated assemblies associated with the pumping units, and metering and delivery stations and fabricated assemblies

therein. The pipes used in connection with the storage of the Designated Chemicals in the USTs include “connecting piping”, such as pipe, valves elbows, joints, flanges and flexible connectors through which the Designated Chemicals flow. The UST system also includes the vapor recovery lines, vent lines and associated fittings as well as the associated secondary containment systems, the drainage systems which collect surface water run off from the petroleum dispensing and delivery areas. Finally, the UST systems include secondary containment and spill control systems including but not limited to secondary containment for the underground tank system, leak detection sensors, pipe, connecting pipe, dispensers and dispenser piping and the petroleum delivery area, as well as for the drainage systems which collect surface water run off from the dispensing and delivery area.

Investigations and reports conducted and prepared for the California State Water Resources Control Board (“SWRCB”)(with the assistance and input of the Environmental Health Divisions and Departments for a number of California counties and Regional Water Quality Control Boards as well as various members of the oil industry), the California Environmental Protection Agency (“CEPA”), Department of Toxic Substances Control (“DTSC”), the Office of Pollution Prevention and Technology Department, as well as testing undertaken by the various city fire departments where the Facilities are located, demonstrate that discharges of petroleum products including the Designated Chemicals occur, and are expected to occur, from the gasoline service station operations at the Facilities on a regular and ongoing basis. The CWRQB Report concluded that 61% of all USTs in operation, at any given time, are discharging/releasing gasoline and other refined petroleum products including the Designated Chemicals into or on to the land. The CWRQB Report also found that the percentage of USTs found to be discharging/releasing gasoline and other refined petroleum products including the Designated Chemicals into or on to the land was not materially different whether the underground storage tank was single or double-walled. ARCO, as well as the oil industry in general, know of these facts.

Because ARCO, as well as the oil industry in general, is aware of these facts, ARCO, along with the oil industry, have in place leak detection sensor systems. The fact that ARCO uses such a system is an acknowledgement by ARCO that it knows that the USTs it operates are likely to leak at any given time. The sensors do not inform ARCO that the USTs are about to release product, only, at best that the USTs have leaked and/or are leaking product, including the Designated Chemicals. Further, the CWRQB Report noted that the leak detection systems in use by the industry only record a discharge from the USTs where the leak is **more** than 0.1 gallons/hour (2.4 gallons a day, or 876 gallons a year per sensor). That is, even under this extremely lax standard, ARCO does not even record a discharge until an individual tank sensor (of which there are usually more than one in any UST) records a discharge of **greater than 876 gallons a year**. Naturally, the level of non-recorded discharge can be much higher for any individual UST since there may be four or more sensors in any given system **each of which** is failing to record a discharge of slightly less than 876 gallons a year. Finally, a report prepared by the SWRCB Underground Storage Tank Program entitled “Field Evaluation of Underground Storage Tank System Leak Detection Sensors” expressly found that the leak detection sensors systems used by the oil industry, including ARCO, are not reliable where, as the report noted, the sensors have not been properly installed, programmed, maintained and operated, or when the secondary containment in which they are installed are not working properly. The SWRCB, in analyzing the use of leak detection sensor systems by the oil industry (including ARCO), specifically noted a number of significant problems which greatly lessened the utility of such sensors including the following: “sensors were raised from the low point of the secondary containment, sensors fail[ed] to alarm when tested, and sensors fail[ed] to shut down the turbine pump in the event of an alarm.” The report went on to note that almost a third of the secondary containment systems had water or product in one or more areas, a fact which would seriously impact the operational effectiveness of the sensor detection systems. Under these circumstances, the sensors will simply not operate effectively, even at the lax warning level used by ARCO. Further, since such sensors, even when working properly, do not prevent leaks but, at best, simply record them, they are ineffective to avoid liability under Health & Safety Code sections 25249.5 and 25249.7. In order to be in compliance with Proposition 65 ARCO must therefore effectively contain the Designated Chemicals in a UST system which is “product tight”, as

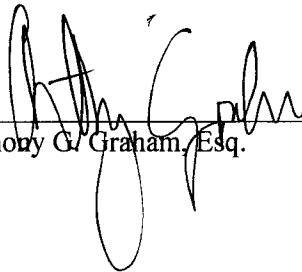
defined above.

The gasoline service operations of ARCO therefore pose and threaten to pose an imminent threat to human health or safety or the environment and therefore create a substantial probability of harm since there is a substantial likelihood that the majority of the USTs operated and maintained by ARCO are either currently or likely will shortly discharge/release gasoline and other refined petroleum products into or on to the land. Such a discharge/release of the Designated Chemicals from the USTs at the Facilities "probably will pass into [a] source of drinking water." It is clear therefore that for the entire period of time that ARCO has owned and/or controlled the USTs located at the Facilities, ARCO has been and continues to be in violation of Proposition 65. Given that the maximum prior period of potential liability pursuant to Proposition 65, Business & Professions Code §17200 and Fish & Game Code §5650(which are the operative statutes pursuant to which a complaint will be filed against ARCO) is four years, this Notice is intended to inform ARCO that it has been in violation of Proposition 65 from the time period from four years prior to the date of this notice and continues to be in violation, for every day upon which ARCO owns and/or controls the underground storage tank systems for any Facility listed on Exhibit A.

Proposition 65 requires that notice and intent to sue be given to ARCO sixty days before a suit is filed. With this letter, CDG gives notice of the alleged violations to ARCO and the appropriate governmental authorities. This notice covers all violations of Proposition 65 that are currently known to CDG from information now available to it. CDG reserves the right to amend this Notice to inform ARCO of other violations and/or exposures as it gathers further information. With the copy of this amended notice submitted to ARCO, a copy is provided of "The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary."

Dated: March 8, 2005

By:



Anthony G. Graham, Esq.

**EXHIBIT A
ARCO GAS STATIONS**

1222 E FIRST ST SANTA ANA, CA 927016309 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	3901 E RIVERDALE AVE ANAHEIM, CA 928072610 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
1620 N BROADWAY SANTA ANA, CA 927063909 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	3101 E LA PALMA ANAHEIM, CA 92801 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
801 N BRISTOL ST SANTA ANA, CA 92703 2135 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	300 S BROOKHURST ST ANAHEIM, CA 928042412 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
324 S GRAND AVE SANTA ANA, CA 92701 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	11500 BEACH BLVD STANTON, CA 906803607 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
1539 S STANDARD AVE SANTA ANA, CA 92707 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	799 W 19TH ST COSTA MESA, CA 92627 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2016 W 17TH ST SANTA ANA, CA 92706 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	18972 BEACH BLVD HUNTINGTON BEACH, CA 92648 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2245 S MAIN ST SANTA ANA, CA 92707 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	2351 E ORANGETHORPE FULLERTON, CA 92831 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2646 W FIRST STREET SANTA ANA, CA 92703 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	6982 WESTMINSTER BLVD WESTMINSTER, CA 926833711 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2730 W MCFADDEN AVE SANTA ANA, CA 92704 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	16501 GOLDENWEST ST HUNTINGTON BEACH, CA 926474414 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
302 W FIRST ST SANTA ANA, CA 92701 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	21452 BROOKHURST ST HUNTINGTON BEACH, CA 926467353 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2940 N BRISTOL ST SANTA ANA, CA 92706 1008 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	1202 E ORANGETHORPE AVE FULLERTON, CA 92831 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2721 W EDINGER AVE SANTA ANA, CA 92704 3523	13142 GOLDENWEST ST WESTMINSTER, CA 926832235

COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
14121 NEWPORT AVE TUSTIN, CA 92780 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	1700 W LA PALMA AVE ANAHEIM, CA 928013528 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
14244 NEWPORT AVE TUSTIN, CA 92780 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	530 N BROOKHURST ST ANAHEIM, CA 928015201 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
3414 S MAIN ST SANTA ANA, CA 92707 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	17502 GOLDENWEST ST HUNTINGTON BEACH, CA 926476223 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
14231 RED HILL AVE TUSTIN, CA 92780 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	2800 W BALL ROAD ANAHEIM, CA 928044921 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
291 S TUSTIN ST ORANGE, CA 92866 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	304 S MAGNOLIA AVE ANAHEIM, CA 928042116 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
13361 HARBOR BLVD GARDEN GROVE, CA 92843 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	15501 EDWARDS STREET HUNTINGTON BEACH, CA 926472915 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
480 N GLASSELL ST ORANGE, CA 92866 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	19971 BEACH BLVD HUNTINGTON BEACH, CA 926483705 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
100 N TUSTIN AVE ORANGE, CA 92867 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	6311 WESTMINSTER AVE WESTMINSTER, CA 926833615 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2937 E CHAPMAN AVE ORANGE, CA 928693703 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	401 N PLACENTIA FULLERTON, CA 92831 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
10975 EDINGER AVE FOUNTAIN VALLEY, CA 92708 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	6002 BOLSA AVE HUNTINGTON BEACH, CA 926472443 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
1801 S STATE COLLEGE BLVD ANAHEIM, CA 928066039 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	2811 W LINCOLN AVE ANAHEIM, CA 928016212 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
13511 EUCLID ST GARDEN GROVE, CA 928432509 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	5700 E LA PALMA ANAHEIM, CA 92806 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)

13331 EUCLID AVE GARDEN GROVE, CA 928432531 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	1124 E CHAPMAN AVE FULLERTON, CA 92831 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2101 S HARBOR BLVD ANAHEIM, CA 928023515 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	5981 WARNER AVE HUNTINGTON BEACH, CA 926494659 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
825 E KATELLA AVE ORANGE, CA 92867 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	1000 W VALENCIA DR FULLERTON, CA 92833 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
3003 NEWPORT BLVD COSTA MESA, CA 926264531 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	751 BAKER ST COSTA MESA, CA 926264366 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
1935 E KATELLA AVE ORANGE, CA 928675108 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	519 S HARBOR BLVD FULLERTON, CA 92832 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
14511 BROOKHURST ST WESTMINSTER, CA 926835749 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	7760 CRESCENT AVE BUENA PARK, CA 906203953 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
3201 HARBOR BLVD COSTA MESA, CA 926262508 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	102 E YORBA LINDA BLVD PLACENTIA, CA 928703327 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2445 E BALL RD ANAHEIM, CA 928065402 \\\nCOASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	16502 BOLSA CHICA ST HUNTINGTON BEACH, CA 926493511 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
13482 BROOKHURST ST GARDEN GROVE, CA 928433119 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	9511 VALLEY VIEW ST CYPRESS, CA 906303960 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
12931 GARDEN GROVE BLVD GARDEN GROVE, CA 928422004 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	7990 KNOTT AVE BUENA PARK, CA 906202423 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
300 BRISTOL ST COSTA MESA, CA 926267945 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	7510 ORANGETHORPE AVE BUENA PARK, CA 906213429 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
17475 BROOKHURST FOUNTAIN VALLEY, CA 92708 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	1201 E IMPERIAL HWY PLACENTIA, CA 92870 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
17520 BROOKHURST ST FOUNTAIN VALLEY, CA 927084747	4988 BALL ROAD CYPRESS, CA 906303516

COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2100 SE BRISTOL ST NEWPORT BEACH, CA 926601728 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	2840 E IMPERIAL HWY FULLERTON, CA 928351351 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
1037 W BALL RD ANAHEIM, CA 928021841 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	718 S BREA BLVD BREA, CA 92821 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
18480 BROOKHURST ST FOUNTAIN VALLEY, CA 927086706 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	5012 LINCOLN AVE CYPRESS, CA 906302905 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2493 N TUSTIN ORANGE, CA 928653707 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	120 E IMPERIAL BREA, CA 92821 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
18520 BROOKHURST FOUNTAIN VALLEY, CA 927086708 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	1490 S HARBOR BLVD LA HABRA, CA 90631 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
700 S STATE COLLEGE BLVD ANAHEIM, CA 928054526 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	23611 LA PALMA AVE YORBA LINDA, CA 92887 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
727 S EAST ST ANAHEIM, CA 928054845 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	11171 LOS ALAMITOS BLVD LOS ALAMITOS, CA 907203603 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2490 FAIRVIEW RD COSTA MESA, CA 926266525 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	20572 LAKE FOREST DR LAKE FOREST, CA 926307740 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
13501 MAGNOLIA ST GARDEN GROVE, CA 928442236 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	5472 ORANGETHORPE AVE LA PALMA, CA 906231005 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2791 E LINCOLN AVE ANAHEIM, CA 928063901 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	24181 MOULTON PKWY LAGUNA HILLS, CA 926532782 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
301 S ANAHEIM BLVD ANAHEIM, CA 928053831 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	13550 BEACH BLVD LA MIRADA, CA 90638 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
18025 MAGNOLIA ST FOUNTAIN VALLEY, CA 927085638 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	23742 EL TORO RD EL TORO, CA 926304711 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)

18975 MAGNOLIA FOUNTAIN VALLEY, CA 927086330 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	20940 NORWALK BLVD LAKEWOOD, CA 9071590601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
9472 KATELLA AVE ANAHEIM, CA 928046353 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	1401 E LAMBERT ROAD LA HABRA, CA 90631 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
301 S EUCLID AVE ANAHEIM, CA 928021227 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	15905 VALLEY VIEW AVE SANTA FE SPGS, CA 90670 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
1000 N STATE COLLEGE BLVD ANAHEIM, CA 928062701 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	29080 PORTOLA PKWY LAKE FOREST, CA 92630 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
1201 S BROOKHURST ST ANAHEIM, CA 928045418 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	15700 VALLEY VIEW ST LA MIRADA, CA 90638 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
8032 GARDEN GROVE BLVD GARDEN GROVE, CA 92844100 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	490 PACIFIC COAST HWY SEAL BEACH, CA 90740 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
2021 NEWPORT BLVD COSTA MESA, CA 926272161 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	101 E WHITTIER BLVD LA HABRA, CA 9063190601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
12202 SOUTH STREET ARTESIA, CA 90701 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)	23921 ALICIA PRKWY MISSION VIEJO, CA 926913944 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
13460 E FIRESTONE BLVD SANTA FE SPGS, CA 90670 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	15750 E LEFFINGWELL WHITTIER, CA 90604 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
12157 ARTESIA BLVD CERRITOS, CA 9070190601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	3100 LOS COYOTES LONG BEACH, CA 90808 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
13340 E ROSECRANS AVE NORWALK, CA 90650 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	26001 LA PAZ ROAD MISSION VIEJO, CA 926915315 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
1785 BELLFLOWER BLVD. LONG BEACH, CA 90815 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	590 S PACIFIC COAST HWY LAGUNA BEACH, CA 92651 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
12158 ALONDRA NORWALK, CA 90650	2720 E CARSON ST CARSON, CA 90810

SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
3302 S DIAMOND BAR BLVD DIAMOND BAR, CA 91765 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	4900 PALO VERDE BLVD LAKEWOOD, CA 90713 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
4265 WOODRUFF AVE LAKEWOOD, CA 90713 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	12606 E ROSECRANS AVE SANTA FE SPRINGS, CA 90670 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
13411 IMPERIAL HWY WHITTIER, CA 9060590601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	27491 LA PAZ RD LAGUNA NIGUEL, CA 926773739 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
15604 S PIONEER BLVD NORWALK, CA 9065090601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	25122 MARGUERITE PKWY MISSION VIEJO, CA 926922445 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
15306 E WHITTIER BLVD WHITTIER, CA 9060390601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	4235 E ANAHEIM ST LONG BEACH, CA 90804 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
3955 E OCEAN BLVD LONG BEACH, CA 90803 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	4895 BELLFLOWER BLVD LONG BEACH, CA 90808 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
1001 REDONDO AVE LONG BEACH, CA 90804 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	3201 SEVENTH ST LONG BEACH, CA 90804 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
10717 CARMENITA RD WHITTIER, CA 90605 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	10717 CARMENITA RD WHITTIER, CA 90605 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
18811 COLIMA RD ROWLAND HEIGHTS, CA 91748 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	14000 E LAMBERT RD WHITTIER, CA 90605 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
800 SERFAS CLUB DR/91 FWY CORONA, CA 928822831 UPPER SANTA ANA VALLEY GROUNDWATER BASIN (Sub-basin 8-12)	27682 CROWN VALLEY PKWY MISSION VIEJO, CA 926916522 COASTAL PLAIN OF ORANGE COUNTY (Sub-basin 8-1)
29880 SANTA MARGARITA PKY R SANTA MARGARITA, CA 926883608 SAN JUAN VALLEY GROUNDWATER BASIN (Sub-basin 9-1)	2330 E 7TH STREET LONG BEACH, CA 90804 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
2330 E 7TH STREET LONG BEACH, CA 90804 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	1010 FAIRWAY DRIVE WALNUT, CA 91789 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)

9151 S PAINTER AVE WHITTIER, CA 90605 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	2790 CHERRY AVE SIGNAL HILL, CA 90755 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
780 BREA CANYON BLVD DIAMOND BAR, CA 91789 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	13010 E LAMBERT ROAD WHITTIER, CA 90602 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
1735 W 6TH ST CORONA, CA 928822955 UPPER SANTA ANA VALLEY GROUNDWATER BASIN(Sub-basin 8-12)	998 E ANAHEIM LONG BEACH, CA 90813 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
10602 E IMPERIAL HWY NORWALK, CA 90650 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	5304 PARAMOUNT BLVD LAKEWOOD, CA 9071290601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
2011 DEL AMO BLVD LAKEWOOD, CA 9071290601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	10801 STUDEBAKER RD DOWNEY, CA 9024190601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
4123 CHINO HILLS PARKWAY CHINO HILLS, CA SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	300 N AZUSA AVE WEST COVINA, CA 91790 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
5280 FAIRFIELD RANCH ROAD CHINO HILLS, CA 91709 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	447 S AZUSA LA PUENTE, CA 91744 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
1401 S HACIENDA BLVD HACIENDA HEIGHTS, CA 91745 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	16804 DOWNEY AVE PARAMOUNT, CA 90723 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
124 W PACIFIC COAST HWY LONG BEACH, CA 90806 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	9522 FIRESTONE DOWNEY, CA 9024190601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
200 W WILLOW BL LONG BEACH, CA 90806 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)	12525 HADLEY ST WHITTIER, CA 90601 SAN FERNANDO VALLEY GROUNDWATER BASIN (Sub-basin 4-12)
624 W 6TH ST CORONA, CA 928823209 UPPER SANTA ANA VALLEY GROUNDWATER BASIN(Sub-basin 8-12)	

CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to this case. I am a resident of or employed in the county where the mailing occurred. My business address is 950 South Coast Drive, Suite 220, Costa Mesa, California 92626.

I SERVED THE FOLLOWING:

- 1.) 60-Day Notice of Intent to Sue Under Health & Safety Code Section 24249.6;
- 2.) The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary (*only sent to violators.*)

by enclosing a true copy of the same in a sealed envelope addressed to each person whose name and address is shown below and depositing the envelope in the United States mail with the postage fully prepaid:

Date of Mailing: March 8, 2005
Place of Mailing: Costa Mesa, California

NAME AND ADDRESS OF EACH PERSON TO WHOM DOCUMENTS WERE MAILED:

Robert A. Malone, President BP America Inc. Atlantic Richfield Company 200 E Randolph Dr Chicago, IL 60601	California Attorney General (Proposition 65 Enforcement Division) 1515 Clay Street, 20th Floor Oakland, CA
Robert A. Malone, President BP America Inc. Atlantic Richfield Company 4101 Winfield Road Warrenville, IL 60555	

San Diego City Attorney
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San Diego, CA 92101

San Diego County District Attorney
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Los Angeles City Attorney
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Los Angeles, CA 90012

Los Angeles County DA
210 W. Temple Street, 18th Floor
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Riverside County DA
4075 Main St., 1st Fl.
Riverside, CA 92501

San Bernardino County DA
316 N. Mountain View Av.
San Bernardino, CA 92415

Orange County District Attorney
700 Civic Center Dr. W., 2nd Fl.
Santa Ana, CA 92701

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: March 11, 2004
