

August 20, 2010

Ms. Duronda Smith  
Atlantic Richfield Company  
1701 Summit Avenue, Suite 2  
Plano, TX 74074-8415

Re: Former Amoco Well Site – Nessu #11  
Section 20, T-2-N, R-66-W,  
Weld County, Colorado

Dear Ms. Smith,

Colorado Oil and Gas Conservation Commission (COGCC) staff has reviewed the Additional Site Assessment report dated March 10, 2010, in regard to the referenced site. Based on review of this information COGCC agrees that there does not appear to be an impact to groundwater that exceeds COGCC Table 910-1 levels or Colorado Department of Public Health and Environment – Water Quality Control Commission (CDPHE-WQCC) standards for organic chemicals in groundwater. In addition, the extent of impacted soil has been adequately delineated. However, concentrations of Total Petroleum Hydrocarbons (TPH) in soil exceed the current 500 mg/Kg allowable level.

The following three remedial options for residual soil contamination were presented in the report: natural attenuation, excavation and disposal and bioremediation. Because the impacted soil is in contact with shallow groundwater and there are numerous water wells in the vicinity that utilize groundwater for domestic water supplies, the remedial option of natural attenuation is not appropriate. Although the site assessment has not documented an impact to groundwater, the residual soil contamination may still represent a threat to shallow groundwater resources.

It should be noted that the original investigation into historic impacts at this location was undertaken due to a complaint filed by the surface owner. Leaving contaminated soil in place that exceeds regulatory standards could negatively impact the value and/or future uses of the property. This is another reason that COGCC cannot approve natural attenuation with no further action required.

The COGCC will approve either the excavation and disposal or bioremediation alternatives. If enhanced bioremediation is selected, additional confirmation samples would have to be collected to verify adequate degradation of TPH to concentrations below the 500 mg/Kg standard.

Atlantic Richfield Company  
August 20, 2010  
Page 2

Please provide a remediation plan with a schedule to implement the plan. The remediation plan should take into consideration the current agricultural land use. The surface owner and tenant farmer shall be consulted regarding timing to prevent disruption to current farming practices and minimize crop damage.

Please call me at 303-637-7178 if you require additional information.

Sincerely,



John E. Axelson, P.G.  
Environmental Protection Specialist

Cc:           Debbie Baldwin – COGCC Environmental Manager  
              Steve Lindblom – COGCC Environmental Supervisor  
              Dorothy Mintle – Surface Owner  
              Chuck Roberts – Atlantic Richfield Company  
              Wade Pigott – Hydro-Environmental Technology, Inc.