



DEPARTMENT OF NATURAL RESOURCES
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May 26, 2009

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) personnel have reviewed the Limited Subsurface Investigation (LSI) report received April 1, 2009, prepared by Hydro-Environmental Technology, Inc., in regard to the referenced site. As you are aware, a complaint was filed with COGCC by the land owner, Ms. Dorothy Mintle, regarding residual hydrocarbons identified in test pits excavated by a company assessing the property for aggregate potential in 2006.

Within the conclusions of the report, a request for no further action was made due to the absence of benzene, toluene, ethyl benzene and xylenes (BTEX) in ground water samples collected to date. A request to classify the site as non-sensitive was also made in regard to the documented soil contamination.

Beginning April 1, 2009, the COGCC rules were amended resulting in changes to the allowable concentrations set forth in Table 910-1. The differentiation of cleanup standards for soil in regard to sensitive and non-sensitive areas was eliminated and a standard of 500 mg/kg total petroleum hydrocarbons (TPH) in soil was adopted. In addition, new standards for BTEX and polynuclear aromatic hydrocarbons (PAHs) were adopted for soil.

Based on the information provided in the LSI, additional site assessment and remediation are required. In accordance with COGCC rule 909.b.(2), sampling and analysis of soil and ground water is required to determine the horizontal and vertical extent of any contamination in excess of the concentrations in Table 910-1. The analytical results from soil samples collected during the LSI documents TPH concentrations above allowable levels from depths of 18-feet to 24-feet below surface grade. The horizontal extent of this contamination has not been adequately delineated to the east of soil boring NBR6 (reference Figure 3 in the LSI).

DEPARTMENT OF NATURAL RESOURCES: Harris Sherman, Executive Director

COGCC COMMISSION: Richard Alward - Thomas L. Compton - Mark Outright - Michael Dowling - Joshua B. Epel - Kimberlee Gerhardt - Trései Houpt - Jim Martin - Harris Sherman
COGCC STAFF: David Neslin, Acting Director - Debbie Baldwin, Environmental Manager - Patricia C. Beaver, Hearings Manager - David K. Dillon, Engineering Manager

The COGCC requires the following additional investigation based on results presented in the LSI:

- Advance another soil boring immediately adjacent to boring (NBR6), collect a soil sample from 20-21.5-feet below surface grade and analyze for BTEX and PAHs.
- Extend this boring to a depth adequate to complete a temporary monitor well and collect a groundwater sample for analysis of semivolatile organic constituents (SVOCs) by EPA Method 8270 including PAHs.
- Advance a sufficient number of soil borings, sample and analyze the soil to adequately delineate the horizontal extent of soil contamination to the east of boring NBR6 (reference Figure 3 in the LSI).

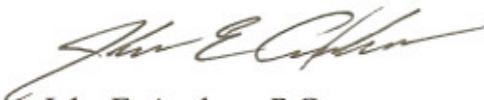
The COGCC also requires that a plan be developed to remediate contaminated soils. The LSI documents that soil contamination is in contact with shallow groundwater. Because there are numerous water wells in the vicinity of the site that utilize groundwater for domestic water supplies, the contaminated soils are required to be remediated to allowable concentrations of TPH, BTEX and PAHs in Table 910-1.

In addition, if SVOCs are detected in concentrations greater than state groundwater standards in the water sample, then additional groundwater characterization and remediation will be required.

The additional site assessment shall be performed with results and a remediation plan submitted to COGCC no later than four months from the date of this letter.

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

Sincerely,



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

Cc: David Neslin, COGCC – Director
Debbie Baldwin, COGCC – Environmental Manager
Dorothy Mintle – Surface Owner
Wade Pigott – Hydro-Environmental Technology, Inc.