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April 25, 2007

Ms. Laura Stuart-Leslie  
Water Division, State Permits Branch  
Arkansas Department of Environmental Quality  
P.O. Box 8913  
Little Rock, AR 72219-8913

*level of  
total solids  
pH  
conductance  
temp  
lead  
chromium*

Re: El Dorado Chemical Company  
Groundwater Monitoring Program

Dear Ms. Stuart-Leslie:

El Dorado Chemical Company (EDCC) staff recently met with our groundwater consultant, EMS, to discuss the recently submitted 2006 annual groundwater report. The purpose of the meeting was to determine if any modifications to the sampling of the monitor wells was appropriate based upon the historical results. As specified in Consent Administrative Order LIS 06-153, Order and Agreement Condition 3, EDCC is required to sample 22 monitor wells for nitrate, ammonia, total dissolved solids (TDS), sulfate, total and dissolved lead, total and dissolved chromium, pH, temperature and specific conductance. Condition 3 also allows for modification to the sampling program based upon review of the data and ADEQ approval. EDCC would like to propose modifications to the facility groundwater monitoring program as outlined in the table below. This new program will generate data for the primary site constituents of concern in the impacted wells semi-annually, while providing data for the clean or less impacted wells annually. Parameters for which sufficient data have been collected (TDS, sulfate, lead and chromium) would be eliminated.

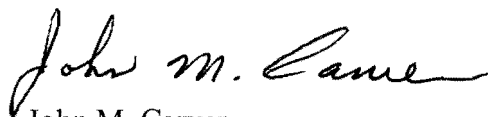
The proposed new monitoring program is as follows:

WELLS	PARAMETERS	FREQUENCY
MW-6 through 11, MW-14, MW-16, MW-17	Ammonia, Nitrate, pH, temperature, specific conductance	Semi-annually
MW-1 through MW-5, MW-12, MW-13, MW-15, MW-18 through MW-22	Ammonia, Nitrate, pH, temperature, specific conductance	Annually (November)
MW-1 through MW-22	Water Level Elevation Measurements	Semi-annually

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The annual groundwater report will continue to be provided by April 1 of each year. If you would like to discuss the proposed modifications to the monitoring program, please give me a call at (405) 235-4546. EDCC would like to implement the changes for the upcoming May 2007 sampling event so a response at your earliest convenience would certainly be appreciated.

Sincerely,

A handwritten signature in cursive script that reads "John M. Carver".

John M. Carver  
Vice President Safety & Environmental Compliance  
El Dorado Chemical Company

cc: Greg Withrow, EDCC  
Laurie Marcella, EMS