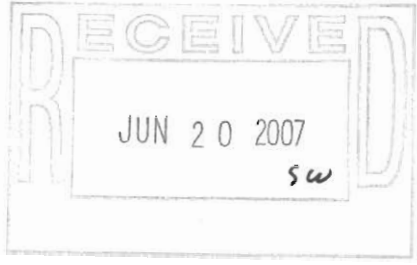


4500 NORTH WEST AVE. • P. O. BOX 231 • EL DORADO, AR 71731 • (870) 863-1400



CHEMICAL COMPANY



May 22, 2007

Ms. Laurie Marcella  
Water Division  
Arkansas Department of Environmental Quality  
P.O. Box 8913  
Little Rock, AR 72219-8913

RE: Plug and Abandon Old Monitoring Wells Nos. MW-1, MW-2, MW -3, MW-4  
El Dorado Chemical Company

Dear Ms. Marcella

El Dorado Chemical Company (EDCC) had verbally requested and was granted permission to plug and abandon four older monitoring wells. This action has been completed through the attached procedure and without incident. This work was performed by Basic Energy Services and their field logs and summary are also attached. For your reference the attached drawing should give you the general location of these wells to the remaining plant site.

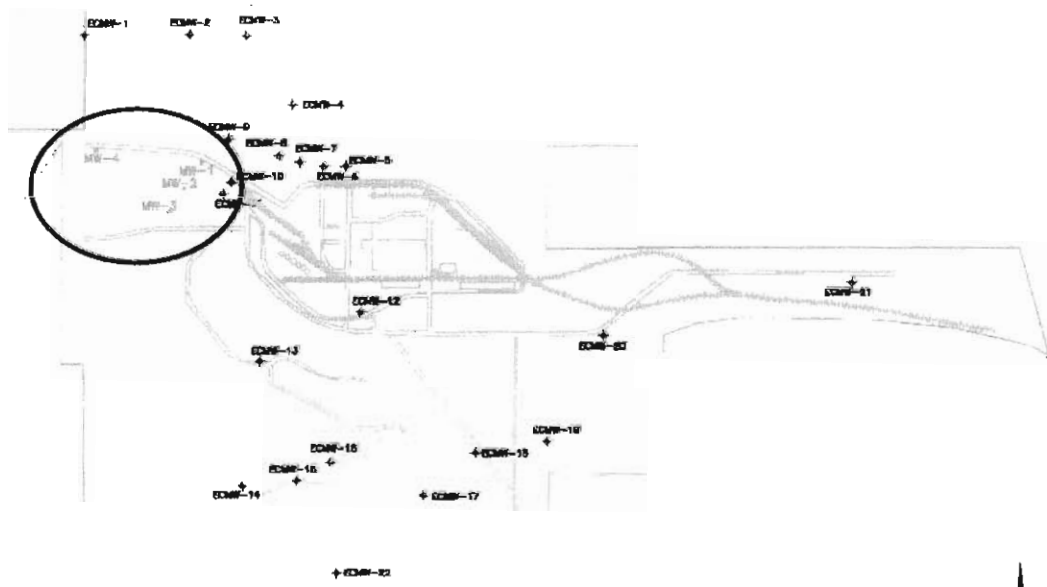
We appreciate your consideration and support on this matter and are available to answer any questions you or your staff may have regarding this action. Please contact Bob McKinney (501-863-1467) or me at 870-863-1400 if you need additional information.

Sincerely,  
El Dorado Chemical Company

*Gregory Withrow*  
Greg Withrow  
General Manager

- cc: Mo Shafii – ADEQ
- John Carver – LSB
- Brent Parker
- David Sartain
- Bob McKinney

NPDES PERMIT FILE  
 NPDES # AR0000152  
 AFIN # 70-00040  
 \_\_\_\_\_ Permit PN  
 \_\_\_\_\_ ✓ Correspondence  
 \_\_\_\_\_ Technical Backup  
6-20-07 SW Date Scanned



**EL DORADO**

SITE MAP

2006 ANNUAL GROUND WATER REPORT  
EL DORADO CHEMICAL COMPANY  
EL DORADO, ARKANSAS

|       |          |         |          |
|-------|----------|---------|----------|
| DATE  | 02/22/07 | PROJECT | 2006 GW  |
| SCALE | As Shown | BY      | ELC      |
|       |          | DATE    | 02/22/07 |

**ENVIRONMENTAL**  
MANAGEMENT SYSTEMS, INC.

Scale: 0 500 1000  
Feet

Location of Plugged Monitoring Wells

**Monitoring Well Closure Procedure**

1. Well casing is to be inspected and any foreign debris removed.
2. Small diameter injection tubing is used to fill entire casing with high density and flow-able cement mixture from bottom of well till material flows from top of casing.
3. The security boxes presently used on the wells will remain with the following provisions.
  - The boxes will be re-marked to clearly identify the well number
  - The boxes will be marked to indicate the well has been plugged and the date of plugging.
  - The boxes will be sealed with a break away seal to indicate any tampering with well.
4. All material and refuse generated from the plugging operation be picked up and properly disposed of.
5. Appropriate documentation prepared and sent to the ADEQ including field logs generated by the plugging operation.
6. Permanent files on ground water monitoring are marked to document action

# ARKLA CEMENTING, INC.

A Division of Basic Energy Services  
24 Hour Service

**No 3742**

**JOHN D. COLEMAN**  
Home: (870) 797-2494  
Cell: (870) 814-1796

Office: (870) 875-2999  
Fax: (870) 875-2992

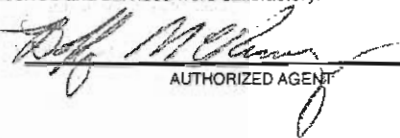
Union Co

|   |                            |            |                                       |                                  |
|---|----------------------------|------------|---------------------------------------|----------------------------------|
| DATE<br><b>10-14-07</b>                     | ORDER NO.<br><b>327081</b> | CONTRACTOR | WELL NAME<br><b>Observation Wells</b> | NUMBER<br><b>MW1 MW2 MW3 MW4</b> |
| CUSTOMER'S NAME<br><b>ELDorado Chemical</b> |                            |            | CEMENTED BY<br><b>West</b>            |                                  |
| ADDRESS                                     |                            |            | TRUCK DRIVER<br><b>Williams Michi</b> |                                  |
| CITY  |                            |            | SIZE OF CASING<br><b>2" + 4"</b>      |                                  |
|   |                            |            | DEPTH OF HOLE<br><b>25'</b>           |                                  |

Service Instructions: **Plug 3 2" tubing observation wells + 1 4" tubing observation well, on the 2" tubing pump 10 SKS slurry to fill up tubing on 4" tubing pump 20 SKS slurry to fill tubing (10 SKS class 'A' = 2 BBL'S) (20 SKS class 'A' = 4 BBL'S)**

| ITEM              | QUAN. | MATERIAL OR SERVICES  | UNIT PRICE        | AMOUNT             | REMARKS                     |
|-------------------|-------|-----------------------|-------------------|--------------------|-----------------------------|
| Pumping           | 1     | Pump Charge           |                   | 1500 <sup>00</sup> | 14286, 14287, 14297         |
| Mileage/          | 20    | DOT mileage           | 5 <sup>00</sup>   | 100 <sup>00</sup>  |                             |
| Mileage/          | 20    | DOT mileage           | 5 <sup>00</sup>   | 100 <sup>00</sup>  |                             |
| Mileage/          | 20    | Non DOT mileage       | 4 <sup>25</sup>   | 85 <sup>00</sup>   |                             |
| Oil               |       | Gals.                 |                   |                    | Bags Returned Amount Credit |
| Flare             |       | Gals.                 |                   |                    |                             |
| Inhibitor         |       | Gals.                 |                   |                    |                             |
| Surcharge         |       |                       |                   | 300 <sup>00</sup>  |                             |
| Min Dec.          |       |                       |                   | 150 <sup>00</sup>  |                             |
| Supervisor Charge |       |                       |                   | 350 <sup>00</sup>  |                             |
| Water truck       |       |                       |                   | 550 <sup>00</sup>  |                             |
| WD Rig up Charge  |       | <b>X3</b>             | 481 <sup>50</sup> | 1444 <sup>50</sup> |                             |
| Binding           | 50    |                       | 1 <sup>40</sup>   | 70 <sup>00</sup>   |                             |
| Light Cement      |       | 94                    |                   |                    |                             |
| Class H Cement    |       | 94                    |                   |                    |                             |
| Class A Cement    | 50    | 5 <sup>LL</sup><br>24 | 18 <sup>00</sup>  | 900 <sup>00</sup>  |                             |
| Calcium Chloride  |       | 100                   |                   |                    |                             |
| Order             |       |                       |                   |                    |                             |

The undersigned hereby certifies that the materials listed above were received and services were satisfactory.

  
AUTHORIZED AGENT

|                 |                          |
|-----------------|--------------------------|
| Subtotal        | 5550 <sup>00</sup>       |
| Delivery Charge |                          |
| Sales Tax       |                          |
| <b>TOTAL</b>    | <b>5550<sup>00</sup></b> |