March 12, 2007

Mr. Matt Rudolph
Water Enforcement Branch (6EN-WR)
EPA Region 6
1445 Ross Avenue; Ste. 1200
Dallas, Texas 75202-2733

Re: Administrative Order Docket Number CWA-06-2007-1708
Facility Number OKU 000604

H4U Pond Remediation Project Amended Facility Work Plan

Dear Mr. Rudolph,

This correspondence will serve to amend Citation's Facility Work Plan for the West Pond Area Remediation Project.

As we discussed on March 7, 2007, Citation no longer plans to excavate the small adjacent area (an old pit: N 34 degrees 1022.7' W 097 degrees 1006.9') addressed as Action Item Number Four in our correspondence of February 6, 2007. Once we initiated excavation, a slight yet continuous seepage of water was identified. We tested the water and found chloride levels ranging from 24 to 37 ppm (see Attachment 1).

With respect to this new data, we hereby submit our amendment to the Facility Work Plan:

Citation intends to install an interceptor trench along with a small sump pump within the old pit area. The water will be captured and delivered a short distance to our 110 bbl. storage tank located adjacent to the pond. As detailed in our initial correspondence, water collected in the storage tank will be pumped to our nearby Baumert Disposal well.

Thank you for the verbal approval to move forward with these changes. Should you have any additional questions or requests, please feel free to contact me at 281-517-7516.

Sincerely,

Paul Lankford

Paul Lankford
Manager, Regulatory Affairs

Citation OIL & GAS CORP.

General Purpose Worksheet

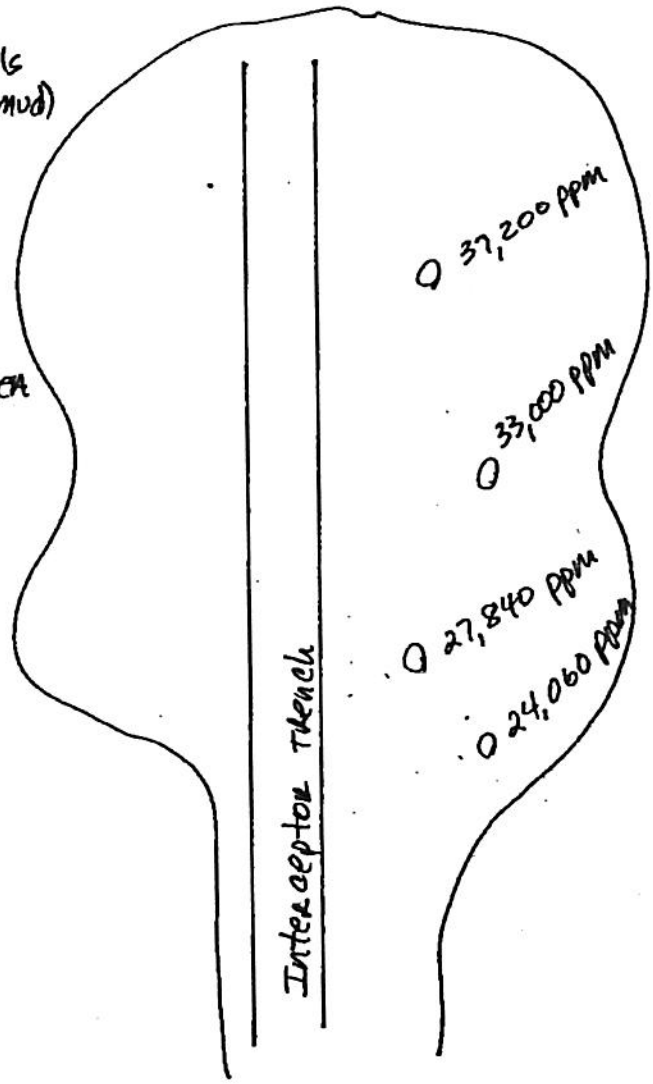
SUBJECT: H4U SALTWATER PIT AREA	PAGE NO.:	OF:
FILE:	BY: DWB	DATE: 3/6/07

N
W ← → E
S

① EXCAVATED SALTWATER PIT AREA & FOUND HARD bottom 3-4' down
② FOUND 4 spots of seepage & tested chlorides as described on DRAWING
③ Seepage is from the EAST (up hill); WATER travels through salty soil to give high chloride Readings
④ Suggested Plan- dig interceptor trench South to North & install sump pump
Ⓐ lay line to tank by Retention Pond & mix with WATER Pumped from Retention Pond
Ⓑ Pump PIT WATER & POND WATER to disposal

⑤ Interceptor Trench Details
Ⓐ 5-7' deep w/ Dolomite (mud) on Bottom
Ⓑ 2" ROCK
Ⓒ 4" Sewer Pipe
Ⓓ FABRIC to Keep dirt out of ROCK
Ⓔ 3-4' top soil & seed AREA

* We will empty the seepage WATER & 24 hrs later empty again to determine the volume of the seepage.

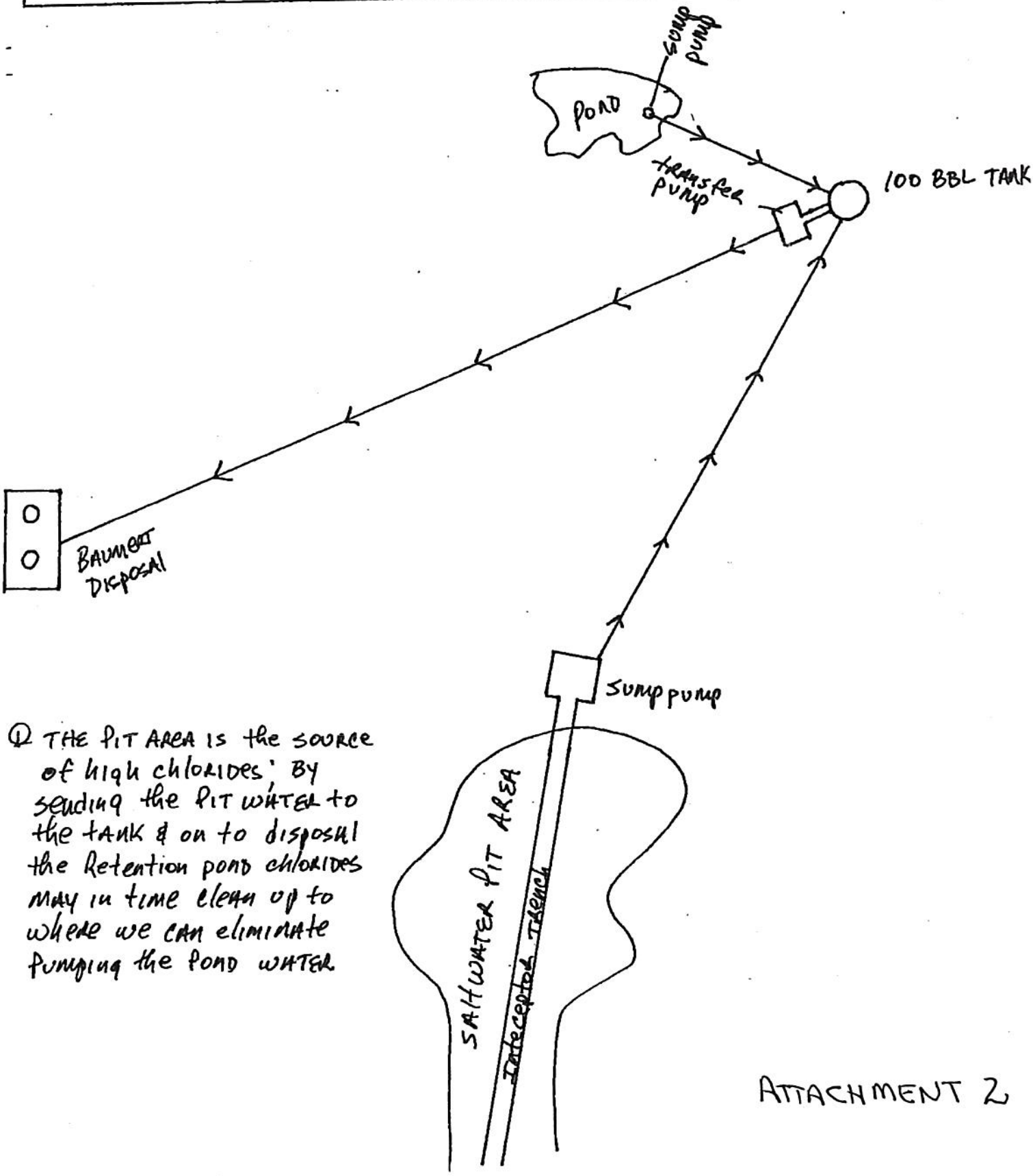


ATTACHMENT 1

Citation OIL & GAS CORP.

General Purpose Worksheet

SUBJECT: Overview of H4U Project	PAGE NO.:	OF:
FILE:	BY: Gwb	DATE: 3/6/07



① THE PIT AREA IS the SOURCE of high chlorides; BY sending the PIT WATER to the TANK & on to disposal the Retention POND chlorides MAY in time clean up to where we CAN eliminate pumping the POND WATER

ATTACHMENT 2

FORM NO. 1003 (1973)

P75- 00217

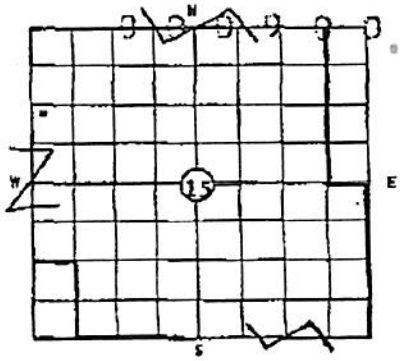
PLUGGING RECORD

(RULE 3-405)

OKLAHOMA CORPORATION COMMISSION

Oil and Gas Conservation Division
380 Jim Thorpe Building
Oklahoma City, Oklahoma 73105

640 Acres



Locate Well Correctly and Outline Lease

NOTICE: All questions on this form must be satisfactorily answered and mailed to applicable Conservation District Office in duplicate and within 15 days after plugging is completed.

Company Operating Edwin L. Cox

Office Address Drawer 730 - Healdton, Okla. ZIP 73438

County Carter Sec. 15 Twp. 4S Range 3W

Location in Section NW NW ¼ SW ¼ NW ¼

Farm Name Healdton IV Unit Well No. MH-19 Field Healdton

Character of Well (whether oil, gas or dry) Oil

Commenced Plugging 12-9-74 Finished 12-20-74 Total Depth 1052' PBTD

Was permission obtained from the Corporation Commission or its agents before plugging was commenced Yes

Name of CC Field Inspector Mr. J.B. Surratt Perforations 660-1011'

Signature of CC District Manager Terry Stell C. C. District No.

Name of producing sand Healdton Depth top 660' Bottom 1011'

Show depth and thickness of all fresh water, oil and gas formations. Oklahoma Tax Commission Assigned Lease No. 019-24093 and 019-05511

SAND OR ZONE RECORDS / CASING RECORDS

Formation	Content	From	To	Size	Put In	Pulled Out
Healdton	NIL	660'	1011'	10"	475'	NONE
				8"	890'	450'
				6-5/8"	1132'	870'
				5-3/16"	19'	None

Describe in detail the manner in which the well was plugged, indicating where the mud fluid was placed and the methods used in introducing it into the hole. If cement or other plugs were used, state the character of same and depth placed: Associated Wireline Services perf. 750-752, 800-802, 850-852, 900-902, 950-952 & 1000-1002' W/4 - 90 gram charges per interval. Cut 6-5/8" csg. @ 716' & pulled. Perf. 100-102, 150-152, 200-202, 250-252, 300-302, 350-352, 400-402, 450-452, 500-502, 550-552, 600-602, 650-652, 657-660, 687-691, 700-702, 730-734, 750-752, 784-792, ~~799-802, 805-814, 822-825, 831-834, 851-853, 872-877, 900-902, 929-931, 950-952 & 979-1011'~~ W/4 - 90 gram charges per interval. Ran tbg. to 1050'. Mix & pump Dowell lite wt. cement & circ. to surface W/250 sks. Pull tbg. & top out W/50 sks. Put on swage, squeeze to 200# W/115 sks. Cut off casing and weld on steel plate.

Does the above conform strictly to the oil and gas regulations? Yes

The Law requires that adjacent lease, and land-owners be notified; give their names with their addresses below:

REMARKS: Why plugged? No longer economical If abandoned oil or gas well, state amount and date of last production 6-4-71 - 2 bopd & 35 bwpd

Plugging Contractor's Name & Address Dowell - P. O. Box 21 - Tulsa, Okla. 74102 Plugging Foreman

Correspondence regarding this well should be addressed to Edwin L. Cox

Address Drawer 730 - Healdton, Oklahoma 73438

I, the undersigned, being duly sworn upon oath, state that this well record is true, correct and complete according to the records of this office and to the best of my knowledge and belief.

Name and title of representative of company W.B. Curry, Jr. Chief Clerk

Subscribed and sworn to before me this the 26th day of December, 1974

Commission expires 1-26-78

Notary Public

RECEIVED
OIL AND GAS DIVISION
DEC 30 1974
OKLAHOMA CORPORATION COMMISSION
DUNCAN DISTRICT

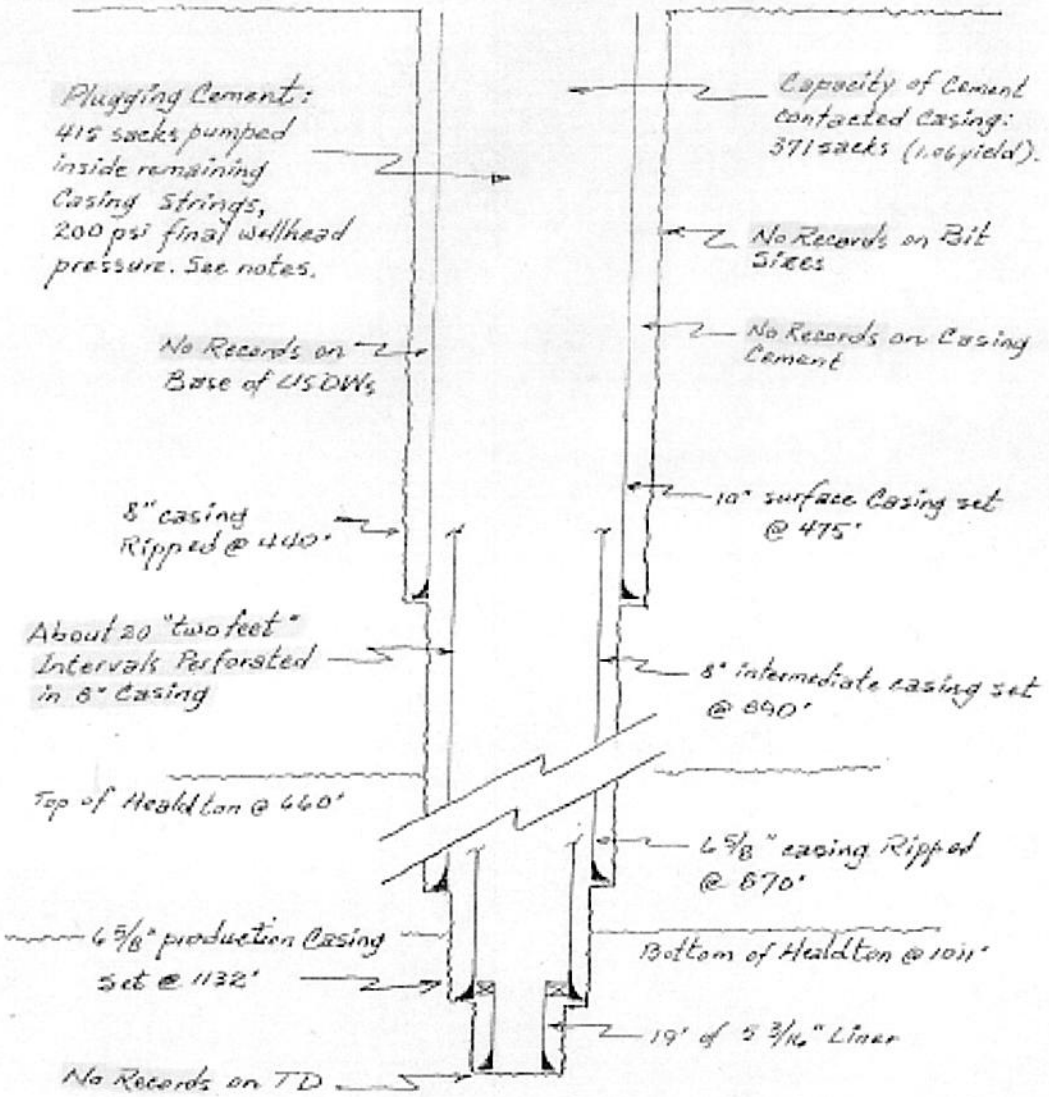
DEC 31 1974
OKLAHOMA CORPORATION COMMISSION

NOTES ON THE PLUGGING JOB FOR THE HEALDTON IV UNIT'S MH-19 WELL

An analysis of the volumes involved in the plugging job for the MH-19 well in the Healdton IV Unit in Carter County, Oklahoma indicates, based on the available data, that this job's effectiveness is, at best, very marginal (see attached well schematic).

The absence of cement records, and the fact that a large number of perforated intervals were placed in the casing strings immediately before the plugging cement was pumped down the hole, have provided the basis for not accounting for any cement behind the casing strings in the computations. Also missing are data on bit sizes, on the base of the USDWs and on the well's total depth.

The available plugging records indicate that a total of 415 sacks of cement were pumped into the strings of casing remaining in the hole. The capacity of the portion of these casing strings likely to be contacted by the plugging cement has been estimated at 371 sacks of cement with a yield of 1.06 CuFt per Sack. This means that 44 sacks (approximately 8.5 Bbls) of cement may have been displaced into the annular space, somewhere along the 1100 plus feet of annular space present in this well. Computations indicate that it would have taken about 90 sacks of cement to fill the annular space across the producing zone.

Based on the above analysis, it is doubtful that the plugging cement may have contributed to effectively prevent hydraulic communication between the producing zones and the USDWs in the MH-19 well in the Healdton IV Unit.

HEALDTON IV UNIT M-H 19 WELL
NW NW SW NW SEC 15 03W-04S
CARTER COUNTY, OK