



**Axelson, John**

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**From:** Axelson, John  
**Sent:** Friday, February 25, 2011 11:40 AM  
**To:** 'gene fritzler'  
**Cc:** gfritzler@live.com; sfritzler@kci.com  
**Subject:** RE: Gebauer no 1

Gene,

Just as a follow up I wanted to summarize our conversation since we covered quite a bit. Based on the sample of produced water you collected on 1/5/11, I don't think another sample is needed at this time. Although the quality of the produced water isn't terrible, it is not as good as the groundwater in the vicinity and could potentially cause an impact to groundwater due to the elevated TDS and chloride.

As we discussed, there are a few different approaches you could take as follows:

1. Continue operating the unlined produced water pit and install a permanent point of compliance (POC) water well directly downgradient from the pit complex. The monitor well would be sampled quarterly for BTEX, TPH, TDS, Sulfate & Chloride for the first year. Groundwater results from one of the upgradient boreholes would be used as a baseline to compare the POC results. If an impact to groundwater was determined, then the pits would have to be closed and additional groundwater characterization and remediation would be required. After the first year, monitoring could be decreased to annual sampling if no impact was found.
2. Rebuild the water pit complex and properly line it to prevent any seepage of produced water. This would require removing any impacted material and sampling the underlying soil. Sample results would be submitted with a Form 27 following the same criteria for pit closure. If evaporation was going to be the primary disposal method, the pits would have to be sized accordingly and maintained to prevent any leaks or overflows.
3. Properly close the produced water pit complex and replace with a water tank. Use an alternate method to dispose of the produced water such as transport to an injection well.

These are only suggestions and COGCC would also consider other alternatives you might propose. Please provide the Form 27 with a final report that provides all of the backup information for the site assessment work you have done as previously requested. Please include a proposal for a path forward regarding operation or closure of the produced water pit with the Form 27.

Thanks again for your cooperation regarding this matter.

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