



Axelson, John

From: Axelson, John
Sent: Thursday, October 27, 2011 5:04 PM
To: 'Jim Wieger'
Cc: jpchonka@netscape.net; miked@mdsslaw.com; Baldwin, Debbie; Lindblom, Steven; Gowen, Peter
Subject: RE: Christiansen Tank Battery proposal

Jim,

Regarding the secondary containment for the tank battery and additional water tanks, the proposal below is acceptable and complies with Rule 604.a.(4) as outlined.

Regarding the status of remaining oily waste on the lease roads, COGCC hasn't changed its position as presented in the NOAV (#200308970) and the transmittal letter dated May 2, 2011. The corrective actions still require the removal of all remaining oily waste from the lease roads, tank battery, pumping units, water pit complex and skim pits with appropriate sampling/analysis and waste documentation submitted via Form 27. Based on my most recent inspection it is obvious that Coral has made progress at the location. COGCC appreciates your continued cooperation to bring the location into compliance.

John Axelson, P.G.
Environmental Protection Specialist, Northeast Region
Colorado Oil & Gas Conservation Commission
Phone: 303-637-7178
Cell: 303-877-9964
Fax: 303-637-7179

From: Jim Wieger [<mailto:jimwieger@qwestoffice.net>]
Sent: Tuesday, October 25, 2011 4:01 PM
To: Axelson, John
Cc: jpchonka@netscape.net; miked@mdsslaw.com
Subject: Christiansen Tank Battery proposal

Hi John,

In regard to upgrading our tank battery at the Christiansen lease, we are proposing to remove two old oil production tanks, digging down to clean soil underneath those locations, conducting confirmation sampling, backfilling with clean imported material, and installing a liner. The new gunbarrel that was recently placed will be raised up in order to place the liner underneath. The area of new installation will be isolated from existing tanks as a separate containment area with separating berms with the impervious liner placed over clean soil. Does this procedure seem acceptable for the current situation? The water skim tanks that were recently installed were placed on clean imported material that contains clay material to facilitate compaction and bermed up.

In addition, we would like a confirmation of the status of the road as far as our responsibilities. We have removed the impacted material from the road due to our operations as required in the NOAV. What is your expectation regarding the historic spreading of road stabilization material? We are looking at significant technical and financial issues if we are to attempt to remediate the road to "clean" status without the final determination of responsible parties. In discussion with Mr. Young, the land owner, he is not interested in having the lease road disturbed to this extent and does not have a problem with the current condition.

Please advise on our plan for the tank battery so that we may move forward.

Thanks,

Jim Wieger