

From: [Axelson, John](#)
To: ["Jim Wieger"](#)
Cc: [mike@regs-llc.com](#); [paul.trost@mvseer.com](#); [jpchonka@netscape.net](#); [jrw.coral@gmail.com](#); [Baldwin, Debbie](#); [Lindblom, Steven](#); [Gowen, Peter](#); ["hammer@peetzplace.com"](#); [Scan, OGCC](#)
Subject: RE: Christiansen activities
Date: Thursday, January 05, 2012 3:07:28 PM

Jim,

You can submit the Form 27 for both the tank battery and skim pits. I think at this point it is important just to get a Form 27 in so we have some way to track all of the documentation that will be coming. I would recommend including the confirmation sample results from the excavation at the tank battery and noting on the Form 27 that sample results from the skim pits are pending. I would include the total volume of material excavated with a detailed sample location diagram with depths, summary of analytical results compared to Table 910-1 and lab reports. If the samples verify compliance with Table 910-1, I'll conditionally approve it and you can start backfilling the tank battery area. You can note on the Form 27 that you are investigating remedial alternatives for the impacted soil that will be submitted at a later date. The additional pit closure samples and any other confirmation sampling results can be submitted as an addendum(s) to the same remediation project.

I just got off the phone with Mary at Gardner's Go-Fer's. She said they had collected two, five part composites from the bottom of the excavation at the battery covering an area approx 40' x 60'. I told her COGCC would accept the composite sample results, but additional samples would need to be collected from the sidewalls to verify that all impacted material was removed both laterally and vertically prior to backfilling. I suggested one to two grab samples minimum from each wall of the excavation. The sampling should be done in accordance with Rules 909 & 910 and analyzed for the contaminants of concern for soil listed in Table 910-1.

If you would like a good example of closure documentation, you could reference the *Remedial Construction Completion Report* submitted by Merchant Energy for the Gillham Lease formally operated by Coral in Logan County. Go to the COGCC website @ <http://cogcc.state.co.us/> then select Database, followed by Inspection/Incident, followed by Remediation and enter Project Number 5164. Go to the Form 27 and select Doc. You will see the report dated 12-8-11 Document #2329977.

Thank you for providing the update. Please call if you would like to discuss further.

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Cc. NOAV #200308970 - Correspondence

From: Jim Wieger [mailto:jimwieger@qwestoffice.net]
Sent: Thursday, January 05, 2012 2:12 PM
To: Axelson, John
Cc: mike@regs-llc.com; paul.trost@mvseer.com; jpchonka@netscape.net; jrw.coral@gmail.com
Subject: Christiansen activities

Hi John,

We have been concentrating our efforts at the Christiansen lease on the removal and stockpiling of the soil underneath the tank battery in the area where new the new tank and gun barrel installation will take place. We should be getting results of confirmation sampling from this area shortly. I understand you have been contacted by Gardiner's Go-Fer's regarding sampling in this area. Do you want a separate Form 27 for the tank battery excavation so that we can obtain approval to backfill? Excavation of the skim pit area is still ongoing and you will be contacted when confirmation sampling will be conducted.

As I had mentioned previously, Coral retained the services of Mike Cardillo of Resource Environmental Group Services (REGS) and Paul Trost of MV, LLC to prepare an evaluation of the alternatives available to remediate the petroleum contaminated soil at the site. As per your phone message from December 9, 2011, we did request that REGS conduct an evaluation of thermal desorption (rotary kiln type system) and other alternatives that may be available. Also included in their evaluation will be an estimate of the land farm alternative. Once we have selected the preferred alternative, we will proceed with implementation as soon as practical. Your input and comments during this process will be solicited so that expectations are met. Feel free to contact me if you have additional comments or questions.

Regards,

Jim Wieger
jimwieger@qwestoffice.net