



Re: Church #2 Sampling Report - Remediation #4301

1 message

Axelson, John <john.axelson@state.co.us>

Thu, Nov 29, 2012 at 11:10 AM

To: Matt@caerusoilandgas.com

Cc: Steve Baur <SBaur@kleinfelder.com>, James Milne <James.Milne@state.co.us>, OGCC EnviroScan <OGCC.EnviroScan@state.co.us>, DBowman@kleinfelder.com

Mr. Wurtzbacher,

COGCC has reviewed the sampling report for the land treatment of oily waste at the Church #2 (COGCC Remediation #4301). Total Petroleum Hydrocarbon (TPH) concentrations still exceed the Table 910-1 standard of 500 mg/kg, with the exception of the SP-1 sample.

Pit closure and remediation activities have been ongoing since 2008 at this location. The Form 27 was updated in July 2010, to allow on site land treatment of the remaining oily waste. When E&P waste is treated at a location for more than three years, a Centralized Waste Management Facility permit is required. As a result, Caerus Oil and Gas can continue on site land treatment of the oily waste until July 15, 2013. If the waste has not been adequately treated to meet the Table 910-1 standards by that time, Caerus has the following options:

- Properly dispose of the material off site in accordance with Rule 907.e. and provide disposal documentation, finish pit closure and properly reclaim the surface;
- At least 30-days prior to July 15, 2013, submit a completed Form 28 with appropriate financial assurance in accordance with Rule 908 for ongoing land treatment of oily waste.

If you choose to continue land treatment, please collect additional samples using the same sample locations and depths as done in the most recent sampling event. Since BTEX has not been detected, it is not necessary to analyze for BTEX again in the future; however, in addition to TPH - confirmation samples shall be analyzed for the PAHs, metals and inorganics listed on Table 910-1. Please submit a remediation progress report no later than June 1, 2013, with the additional sample results if you choose to continue on site land treatment.

If you have any questions, please call me at 303-637-7178.

Sincerely,

John Axelson, P.G.
Environmental Protection Specialist, Northeast Region
Colorado Oil & Gas Conservation Commission

Phone: 303-637-7178
Fax: 303-637-7179
Cell: 303-877-9964

Cc. Remediation #4301 - Correspondence

On Fri, Nov 9, 2012 at 11:32 AM, Steve Baur <SBaur@kleinfelder.com> wrote:

Hi John.

Per our conversation yesterday, please find attached the Church #2 pit closure report. (COGCC project # 4301).

Take Care,

Steven W. Baur

Environmental Scientist

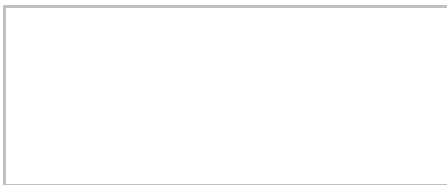
4815 List Drive, Unit 115

Colorado Springs, Colorado 80919

o| 719.632.3593

c| 719.491.7411

f| 719.632.2648



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