From:	Spencer - DNR, Stan
To:	Lindsay Sanders
Cc:	Jake Janicek
Subject:	Re: Caerus Project Rulison Sampling Update & Reporting Question - follow-up question
Date:	Wednesday, October 14, 2015 12:19:41 PM
Attachments:	image002.png image007.png image001.png

Lindsay and Jake

If DOE samples are both below screening levels, I think its OK to report Olsson results as anomalous. In the report include an explanation for this conclusion; DOE results below SLs, not detected in Olsson water sample, gas sampling historic results etc; The report delivery can be postponed until DOE repeat analyses are available.

Jake, please submit an extension request for the report delivery via Form-4. Make sure to give yourself enough time to have lab results and conduct a thorough data review as I prefer not to grant multiple extensions.

Regards

On Tue, Oct 13, 2015 at 4:02 PM, Lindsay Sanders <lsanders@ltenv.com> wrote:

> Mr. Spencer,
>
> As a follow-up, I wanted to ask if Caerus actually needs to resample BM 26-33C at all, or is the DOE's "clean" sample collected on 6/23/15, plus their planned resampling effort on Thursday is enough to prove that Caerus' exceeding sample is an anomaly? I will need an answer on this fairly quickly if I am going to cancel the re-sampling effort, so I'll follow-up with a phone call in the morning if I don't hear back by then.
>
> Thank you,
>
> Lindsay Sanders
>
> Project Engineer
> (303) 501-3416 cell
>
> ---
>
> **From:** Lindsay Sanders
> **Sent:** Tuesday, October 13, 2015 12:37 PM
> **To:** 'stan.spencer@state.co.us' <stan.spencer@state.co.us>
> **Cc:** 'Jake Janicek' <JJanicek@caerusoilandgas.com>; 'Michael McKee' mmckee@caerusoilandgas.com

Subject: Caerus Project Rulison Sampling Update & Reporting Question

Good afternoon Mr. Spencer,

I am writing on behalf of Caerus Oil & Gas. I assist Caerus with Project Rulison compliance. On June 23, 2015, Olsson Associates collected produced gas and produced water samples from Caerus production wells Rulison Federal 19-41C (the closest producing well in Sector 2, Tier II), Battlement Mesa 26-33B (the closest producing well in Sector 10, Tier I), and Battlement Mesa 26-33C (the closest producing well in Sector 9, Tier I) per the production sampling schedule outlined in the Sampling & Analysis Plan (SAP). The Department of Energy (DOE) also collected gas and water samples from Battlement Mesa 26-33B and Battlement Mesa 26-33C on June 23, 2015, as part of their long-term surveillance program.

Olsson received the final laboratory results from Isotech for the June sampling event in mid-August and began drafting the Quarterly Monitoring Report due to the COGCC. During the data review, it was determined that Isotech reported tritium in the Battlement Mesa 26-33C gas sample at 16.3 ± 2.2 TU. This result is above the SAP screening level tritium in gas, but it is below the SAP action level for tritium in gas. Tritium was reportedly not detected in the Battlement Mesa 26-33C produced water sample collected by Olsson. Olsson asked Isotech to re-count the sample using the water of combustion from the original gas sample and the re-count results actually indicated higher concentrations, so we were not able to determine that a lab reporting error had occurred. Isotech also checked the history of the gas sampling tank and determined that it was used once before, but that the submitted sample “was dead”, so they don’t believe that cross-contamination occurred. Knowing that these wells were also sampled by the DOE on June 23, 2015, Olsson requested the results from the DOE. Tritium was not detected in either the gas or water sampled collected by the DOE on June 23, 2015.

We believe that the gas concentration in exceedance of the screening level is an anomaly and that our sample may have been contaminated somehow by lab instrumentation. To confirm this, Olsson is returning to resample the gas at Battlement Mesa 26-33C this Thursday, October 15, 2015. The DOE is also planning to sample the well again on that day. As you know, it takes over a month to get the results back from the lab. **I am wondering if you would like us to submit the 2nd Quarter Monitoring Report now in order to be compliant with the SAP reporting schedule (we could submit a report addendum presenting the re-sampling results when available), or if you would rather we wait for the re-sampling results and include all of the data into one quarterly report?** If we wait for the re-sampling data, the 2nd Quarter Monitoring Report will likely be submitted to you near the end of the year.

Caerus appreciates your time and consideration on this matter.

Sincerely,

Lindsay Sanders

Project Engineer

COMPLIANCE / ENGINEERING / REMEDIATION

LT Environmental, Inc.

975 W 9000 S

Victor, Idaho 83455

(303) 501-3416 cell

www.ltenv.com

lsanders@ltenv.com

Take our LTE Client Satisfaction Survey

Join us on:

This message and any attached files are privileged, confidential, and intended solely for the use of the addressee. If you have received this by mistake, please let us know by reply e-mail and delete it from your system; you may not copy, disclose, disseminate, use or rely upon its content for any use. E-mail transmissions cannot be guaranteed to be secure, error-free, or free of viruses. The sender and LTE therefore do not accept liability for any of these described issues. The comments and opinions expressed herein are those of the author and not necessarily of LTE. Thank you.

Please consider the environment before printing this e-mail.

--

Stan Spencer
Environmental Protection Specialist, NW Region

co_dnr_div_ogcc_300_rgb_ltrhd_v3

Phone 970.625.2497 | Fax 3970.625.5682
Cell 970.987.2891

796 Megan Avenue, Suite 201, Rifle, CO 81650

stan.spencer@state.co.us www.colorado.gov/cogcc

OGCCLogo