

Axelson, John

From: Axelson, John
Sent: Tuesday, May 10, 2011 11:01 AM
To: 'JPChonka@netscape.net'; James Weber
Cc: Willis, Rob; Lindblom, Steven; Baldwin, Debbie
Subject: Christiansen NOAV #200308970

Gentlemen,

In the referenced NOAV issued to Coral Production on May 2, 2011, COGCC requested documentation of the Colorado discharge permit number for the produced water being discharged from the water pit. Information including the latitude/longitude coordinates of the discharge outfall were also requested in accordance with Rule 907.c.(2)E.i. As a follow up, can you please provide the required information or verify that the discharge has been stopped.

If the discharge was not permitted, provide the approximate date the discharge began and the date in which it was stopped. Please provide this information as soon as possible.

Thank you,
John

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

May 10, 2011

Mr. John Axelson, PG
Environmental Protection Specialist
Colorado Oil & Gas Conservation Commission
1120 Lincoln St., Suite 801
Denver, CO 80203

Re: NOAV Christiansen

Dear Mr. Axelson:

As a follow up to the information sent to your officer on May 3, 2011 and in response to your email sent to Jim Chonka & Jim Weber on May 10, 2011, Coral Production Corp. would like to further clarify the issue of the discharge to a natural depression on the referenced lease. I'm not sure if you had received the information (mentioned above) at the time of your email, but we were given authorization by your office through Permit number 270910 in January of 2004 to utilize the natural depression as a produced water pit. Further, we were given permission by the land owner to discharge to this area. He actually requested the water for beneficial use. At no time has the water left the private property where the discharge has been taking place. Based on this information, it appears the Rule 907.c.(2).E.i. does not apply. In fact we are in compliance with Rule 907.c.(2).B. Since this appears to be a point of contention, we have ceased the discharge at this time.

As you requested, the latitude/longitude coordinates of the outfall is as follows:

Latitude: 39° 45' 56.84"; Longitude: 102° 58' 01.47"

Should you have any questions or require further information please contact me at (303) 623-3573, extension 101.

Sincerely,

James C. Wieger,
Geologist and Environmental Coordinator

Axelson, John

From: Axelson, John
Sent: Wednesday, May 11, 2011 8:34 AM
To: 'Jim Wieger'
Cc: Baldwin, Debbie; Willis, Rob; 'JPChonka@netscape.net'; James Weber; Lindblom, Steven; Horton, Colby
Subject: RE: Coral Production Corp. Christiansen discharge

Jim,

After we spoke yesterday I received the information in the mail regarding your response to the Christiansen NOAV and the other inspections. The planned action items outlined in your letter dated May 3, 2011, will be adequate to address the corrective actions required by the NOAV. I appreciate your timely response.

Regarding the discharge of produced water to the natural depression, the information you provided does verify that the natural depression was properly permitted with COGCC as Pit #2, Facility ID #270910. Prior to issuing the NOAV I researched the surrounding wells and pit information, but did not find this documentation. In light of this information, I do not believe COGCC was justified in requesting Coral to stop the discharge.

At this time I will leave it to your discretion whether you want to continue the discharge into the natural depression. I believe there are some issues that may have been overlooked at the time Pit #2 was permitted. Although the produced water in this area from the D & J sands is designated as limited use and quality class, with relatively low TDS, the area is also within the Northern High Plains Designated Groundwater Basin. I am uncertain if a surface discharge of produced water should have been authorized through approval of a pit permit, and the logistics of meeting closure requirements for a 7 to 8 acre natural depression should have been considered.

I will do some additional research regarding the discharge into the natural depression. In the meantime, COGCC appreciates your cooperation in resolving the other corrective actions in a timely manner. Please call me if you have questions regarding remediation or skim pit closure requirements.

Thank you,
John

John Axelson, P.G.
Environmental Protection Specialist, Northeast Region
Colorado Oil & Gas Conservation Commission
Phone: 303-637-7178
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From: Jim Wieger [<mailto:jimwieger@qwestoffice.net>]
Sent: Tuesday, May 10, 2011 2:06 PM
To: Axelson, John
Subject: Coral Production Corp. Christiansen discharge

John,

John Axelson, P.G.
Environmental Protection Specialist