

From: [Axelson, John](#)
To: [Doug Henderer](#); [John Rager \(John@caerusoilandgas.com\)](mailto:John@caerusoilandgas.com); [Dean Haselhorst \(dean@caerusoilandgas.com\)](mailto:dean@caerusoilandgas.com)
Cc: dknicholson@q.com; [Baldwin, Debbie](#); [Lindblom, Steven](#); [Scan, OGCC](#)
Subject: RE: Caerus Church #2 Landfarm - COGCC Remediation #4301
Date: Wednesday, November 02, 2011 10:06:32 AM

Doug,

Thank you for providing the update. COGCC agrees with the proposal for ongoing land treatment of the oily waste as long as the requirements of Rule 907.e.(2) are followed. Please let me know when the trash/debris is cleaned up and stormwater controls are in place so I can document with an inspection.

Prior to the annual sampling, please submit a brief sampling/analysis plan for prior approval including proposed number, location and types of samples. As required in the corrective actions of the inspection performed on 8/18/11, an annual status report will now be required for the duration of the project on October 31st each year. The next status report shall include the following:

- Disposal documentation for the remaining trash debris;
- Dates the material was aerated and moisturized;
- Volume/types of organic material/nutrients and microbes;
- Sample location diagram;
- Summary of analytical results along with lab report.

Based on the COGCC sample results, I don't believe it is necessary to continue to analyze the samples for BTEX; however, each sample needs to be analyzed for Total Petroleum Hydrocarbons in the gasoline range, diesel range and oil range. In addition, the next set of samples will also need to be analyzed for the polynuclear aromatic hydrocarbons listed on Table 910-1.

Although the location is flat, the stormwater controls need to be maintained on a regular basis for the duration of the project. Reference remediation #4301 on all future correspondence related to this project. Please give me a call if you have any questions or would like to discuss further. Thank you,

John Axelson, P.G.
Environmental Protection Specialist, Northeast Region
Colorado Oil & Gas Conservation Commission
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Cc. Remediation #4301/NOAV #200191177 – Correspondence

From: Doug Henderer [mailto:dhenderer@kleinfelder.com]

Sent: Wednesday, October 26, 2011 8:29 AM
To: Axelson, John; John Rager (John@caerusoilandgas.com); Dean Haselhorst (dean@caerusoilandgas.com)
Cc: dknicholson@q.com
Subject: FW: Caerus Church #2 Landfarm

Hello John,

Thank you for your time yesterday to discuss the Church landfarm owned by Caerus. As we discussed, Caerus is the landowner for the lease and has therefore decided to continue to landfarm the oil impacted soils.

The positive actions that Caerus will implement to maintain the landfarm include the following:

- 1) The landfarm will be regularly tilled. It was last tilled on October 15th.
- 2) Debris at the site will be removed and properly disposed of.
- 3) Weeds will be controlled.
- 4) Stormwater runoff will be controlled.

In addition to the above, Caerus will explore the use of amendments and soil treatments to enhance the bioremediation process.

Soil samples will be collected annually at a minimum to monitor the progress of the landfarm. We would be happy to discuss sampling procedures and split samples at you in the future.

Lastly, we understand that in order to obtain final closure for the site, vegetation must be reestablished. Caerus will initiate seeding and revegetation of the site.

Please contact me if you have any questions or concerns,

Thank you,

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