

From: [Fischer, Alex](#)
To: ["Terry Cammon"; Scan, OGCC](#)
Cc: [Bill Warburton; Neidel, Kris; rtssfl@wildblue.net](#)
Subject: FW: Allard 30-8-5 pit status of 120125
Date: Thursday, January 26, 2012 6:52:34 AM
Attachments: [Allard 3-8-5.pit.120125.pdf](#)
[Allard 30-8-5.pit.120125.photo2.pdf](#)
[Allard 30-8-5.pit.photo.3.post.work.pdf](#)
[Allard 30-8-5.pit.120125.photo4.post.work.pdf](#)
Importance: High

Terry- thanks for the update. This looks a lot better than before. We will continue to work with Diversified in closing the pit. Thanks
Alex

Amber- please upload this email and attached photos to Facility ID: 115269.

Thanks
Alex

Alex Fischer, P.G.
Environmental Supervisor - Western Colorado
Colorado Oil and Gas Conservation Commission
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(303) 894-2109 fax
alex.fischer@state.co.us

From: Terry Cammon [<mailto:tcammon@doccolo.com>]
Sent: Wednesday, January 25, 2012 2:14 PM
To: Fischer, Alex; rtssfl@wildblue.net
Cc: Bill Warburton; Neidel, Kris
Subject: Allard 30-8-5 pit status of 120125
Importance: High

Alex: I believe the best way to give you and the COGCC the status of the Allard 30-8-5 pit is to attach the photos, "before any work was done" and "after the work was done" photos of the pit.

In addition, I will address the bullets you sent below.

TJC

From: Fischer, Alex [mailto:Alex.Fischer@state.co.us]
Sent: Thursday, January 19, 2012 11:44 AM
To: Bill Warburton; Terry Cammon
Cc: Neidel, Kris
Subject: RE: Allard 30-80-5

Bill and Terry..I appreciate you calling to discuss this location yesterday. As we discussed, the Form 27 Work Plan and schedule shall be submitted by February 15, 2012 as opposed to January 31, 2012.

Kris..Reese will be contacting us yet this week or by Monday regarding the oil removal.

The following is required:

- Immediately remove all oil from the surface of the pit. Please notify Kris Neidel at 970-871-1963 and Alex Fischer at 303-894-2100 X 5138 by January 20, 2012, confirming that the oil has been removed from the pit. All free oil is off the pits, after 1) breaking up the ice, 2) adding hot water to the pit and covering for + 12 hours, and 3) vacuuming off all moveable oil from the surface of the pit water. The remaining "black" appearance in the pit water is iron sulfide, not oil.
- By ~~January 31, 2012~~ February 15, 2012 the operator must submit a Form 27 Remediation Work Plan to Alex Fischer, Environmental Supervisor, COGCC, detailing how the pit will be closed and in accordance to the 900 Series Rules. Will DO. Oily impacted soils and materials removed from the pit shall be disposed at an approved facility which takes such materials. These impacted materials are NOT allowed to be land farmed treated on site or in the existing land farm area in the vicinity of the site. Discrete samples shall be collected from beneath the pit bottom to adequately characterize remediation of the pit. The existing land farm shall be address in the Form and 27 and this area shall be reclaimed in accordance to the 900 and 1000 Series Rules. and adequate characterization of the soils shall be made. You did mention that if the surface owner, Silver Spur Ranch, approves of remediating the soil at the battery, then can we do so, correct? Reese indicated that is exactly what is being done at Lone Pine Field with Silver Spur Ranch as the surface owner, correct? I strongly prefer not to remove any soil from the site, if at all possible. The chain of custody has become a legal issue in the past.
- Provide a schedule outlining activities for the pit closure and reclamation of the existing land farm. It is anticipated that these activities will be accomplished before Spring. Temperature, both soil and atmospheric will dictate how we can best remove the oil stained soil, and recountour the old pit. I do not believe operations can be successful, until the soil is completely frost free. The currently ongoing remediation you recited without frozen ground is at Lone Pine, correct? What is the Lone Pine pit water temperature ? The Allard pit banks were completely frozen.
- Complete a Form 10 changing the operator from Pauley Petroleum to Diversified Operating for Facility ID: 115269. Submit the Form 10 along with the Form 27. Will do.

- Continue to work with Kris Neidel regarding tank signage, labeling and other housekeeping items. Tracking of the tank placard/warning label shipment, indicated they should be at Reese Fliniau's home address by today.

Thanks

Alex

Alex Fischer, P.G.

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