

STATE OF
COLORADO

Allison - DNR, Rick <rick.allison@state.co.us>

FW: Hillman Info for Rick Allison

Allison - DNR, Rick <rick.allison@state.co.us>
To: Rachel Eisterhold <reisterhold@foundationenergy.com>
Cc: "alyssa@sebagoenviro.com" <alyssa@sebagoenviro.com>

Fri, Feb 21, 2014 at 10:14 AM

Rachel,

Based on the analytical data provided, it appears that the impacted soil has been removed from the pit and the remaining contents meet Table 910-1 Standards for BTEX and TPH. It also appears concentrations of BTEX and TPH in the material removed from the pit for land treatment are now compliant with Table 910-1 Standards. The land farmed material may be reused onsite. However, should future conditions at the site indicate contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be significantly impacted, then further investigation and/or remediation activities may be required at the site.

Concentrations for SAR and specific conductance in samples collected from the pit exceed Table 910-1 Standards. Since these standards are reclamation standards and the samples with elevated SAR and specific conductance were collected at depths greater than three (3) feet, no further remediation of the SAR and specific conductance impacts are necessary at this time. Foundation Energy has permission to backfill the drilling pit and close it in accordance with Rule 1003.d. However, the upper three (3) feet of backfill cover and soil in the pit must satisfy either the Table 910-1 levels for pH, SAR, and EC or the background levels for such contaminants within three (3) feet of the ground surface at the site. In addition, the soil horizons must be replaced in their original relative position and reclaimed in accordance with 1000 Series Rules.

Remediation Project Number 7277 has been resolved in the Colorado Oil and Gas Information System.

Rick Allison, P.G.
Environmental Protection Specialist - Northeast Colorado
Colorado Oil and Gas Conservation Commission

Phone: 970-461-2970
Fax: 970-461-4781
Cell: 970-623-0850

On Tue, Feb 18, 2014 at 3:45 PM, Rachel Eisterhold <reisterhold@foundationenergy.com> wrote:

Rick,

Please see the table that Alyssa put together for the Hillman samples.

There are actually 3 tables to include all the Table 910 constituents. John Axelson said that we didn't have to sample for SVOC's if the BTEX and TPH came back below the standard, so that's why there isn't a separate table for those results.

Also, the soil samples from the landfarm were collected from the landfarmed material so we seem to be having a miscommunication with that.

If you're free some time tomorrow, I'd like to discuss this and answer any more questions you have to close out this project.

Let me know if you're free to talk- I appreciate your help to resolve this pit closure!

Thanks,

Rachel Eisterhold

Foundation Energy Management

Please note new address.

15 East 5th Street, Suite 1200

Tulsa, OK 74103

Please note new telephone numbers.

Direct Line: 918-526-5592

Office Line: 918-526-5500

Fax Line: 918-585-1660



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From: Allison - DNR, Rick [mailto:rick.allison@state.co.us]
Sent: Friday, February 07, 2014 4:15 PM
To: Rachel Eisterhold
Cc: alyssa@sebagoenviro.com
Subject: Re: FW: Hillman Info for Rick Allison

Rachel and Alyssa,

Please include the confirmation samples from the pit bottom in a summary table.

Any material used for backfill or for beneficial reuse on the location must meet Table 910-1 Standards. Therefore, the confirmation samples for the landfarmed material must be from the landfarmed material, not the soil beneath the landfarmed material. Therefore please collect confirmation samples of the landfarmed material.

Thank you.

Rick Allison, P.G.

Environmental Protection Specialist - Northeast Colorado

Colorado Oil and Gas Conservation Commission

Phone: [970-461-2970](tel:970-461-2970)

Fax: [970-461-4781](tel:970-461-4781)

Cell: [970-623-0850](tel:970-623-0850)

On Thu, Feb 6, 2014 at 2:40 PM, Rachel Eisterhold <reisterhold@foundationenergy.com> wrote:

Rick,

I got the following information from our consultant that is helping us with this pit closure.

Please let me know if you have any questions.

Rachel Eisterhold

Foundation Energy Management

*Please note new address.*15 East 5th Street, Suite 1200

Tulsa, OK 74103

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From: alyssa@sebagoenviro.com [mailto:alyssa@sebagoenviro.com]

Sent: Thursday, February 06, 2014 11:47 AM

To: Rachel Eisterhold

Subject: Hillman Info for Rick Allison

Hi Rachel,

I have attached the lab results from the soil samples collected in late August after the south portion of the pit was excavated. There are hits of DRO/GRO that are close to the 500 mg/kg threshold, but the samples did not exceed it. I have also attached a map that will show him where those sample were collected from. When the samples came back ok for TPH and BTEX, a full Table 910 was run on them, so all of that documentation is available as well.

The samples in the landfarm were collected from about 2-3 inches below the surface as the material from the pit was spread very thinly in the entire landfarm area and mixed with manure. There weren't any piles of material. I have photos, and I can speak directly to Rick if that would help as well.

Thanks so much. Let me know if you need anything else.

Alyssa M. Beard

Principal

Sebago Consulting

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