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INDIANA ENERGY, INC.

Regina J. Mahoney, CHMM
Director of Environmental Affairs

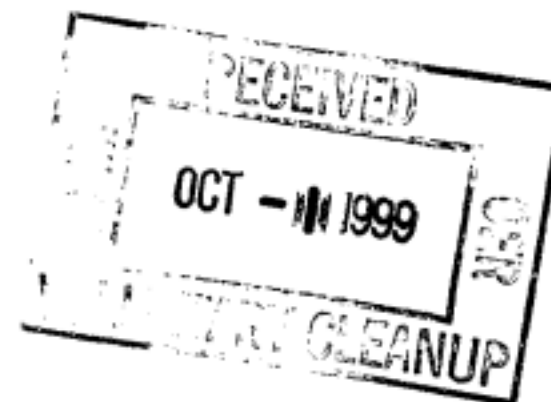
8399 Zionsville Road
Indianapolis, Indiana 46268
Direct Dial: (317) 876-5012
Facsimile: (317) 876-5057
rmahoney@indiana-energy.com

Via FED EX

September 30, 1999

Ms. Peggy Dorsey, Section Chief
Voluntary Remediation Section
Office of Environmental Response
Indiana Department of Environmental Management
2525 North Shadeland Avenue
Indianapolis, IN 46219

Mr. Harry Atkinson, Section Chief
Site Investigation Section
Office of Environmental Response
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46206-6015



Dear Ms. Dorsey, Mr. Atkinson:

RE: Indiana Gas Company, Inc. – Application to VRP, Removal from State CERCLIS List
Clarksville Service Center, 2526 Lincoln Drive, Clarksville, IN 47129
Formerly known as "Clarksville Gravel Pit No. 1"

In accordance with the agreed upon concept – as described in my earlier letter to you both on the subject dated September 7, 1999 (enclosed here for your convenience), enclosed is the certificate of analysis for the samples taken of the groundwater at the above referenced location. Both samples are non detect (ND) at 0.05 mg/L (EPA Method 6010, Prep 3010). Consistent with the circumstances as described in my previous letter, having achieved confirmation of groundwater downgradient of the lead impact and upgradient of the impacted well reported in the FIT investigation, Indiana Gas is going to proceed by submitting the signed VRA for the site and seek a covenant not to sue for subsurface soils potentially impacted by lead. A field sampling and analysis plan and others as needed to proceed to identify the vertical and horizontal impact will be submitted presently.

Again, thank you for your assistance in eventually resolving this circumstance by removing the site from the state CERCLIS list.

Very truly yours,

R. J. Mahoney, CHMM
Director of Environmental Affairs

Enclosures – Indiana Gas letter dated September 7, 1999; Analytical Report – Pace Sample No. 50260066

C: A. Robertson, IDEM; B. Giles, IDEM
B. Rogge, R. Nelson



INDIANA ENERGY, INC.

Regina J. Mahoney, CHMM
Director of Environmental Affairs

8399 Zionsville Road
Indianapolis, Indiana 46268
Direct Dial: (317) 876-5012
Facsimile: (317) 876-5057
rmahoney@indiana-energy.com

Via Hand Delivery

September 7, 1999

Ms. Peggy Dorsey, Section Chief
Voluntary Remediation Section
Office of Environmental Response
Indiana Department of Environmental Management
2525 North Shadeland Avenue
Indianapolis, IN 46219

Mr. Harry Atkins, Section Chief
Site Investigation Section
Office of Environmental Response
Indiana Department of Environmental Management
2525 North Shadeland Avenue
Indianapolis, IN 46219

Dear Ms. Dorsey, Mr. Atkins:


RE: Indiana Gas Company, Inc. – Application to VRP, Removal from State CERCLIS List
Clarksville Service Center, 2526 Lincoln Drive, Clarksville, IN 47129
Formerly known as "Clarksville Gravel Pit No. 1"

This correspondence is in an effort to document understanding resulting from several meetings and telephone conversations on the above referenced property. Indiana Gas Company, Inc. (IGC) has come to know that the site was originally placed on the CERCLIS list as the result of alleged contamination at the Hertzsch Well Field, not the Atkins Well Field as was originally assumed due to its proximity to that – since closed, site. The Hertzsch Well Field, from what we understand is part of the municipal well field currently in operation. The contaminants of interest (COI) are primarily a volatile organic compound (VOC) and chlorinated organic compounds including: benzene; carbon tetrachloride; chlorobenzene; 1,2,di chloroethane; cis 1,2, dichloro ethylene; trans 1,2, dichloro ethylene; tetrachloroethylene; 1,1,1, trichloroethane; trichloro ethylene. As you know, the FIT Site Soil Screening Inspection (SSI) conducted by Roy F. Weston on behalf of US EPA at the site evaluated VOCs, SVOCs, pesticides, PCBs, metals and cyanide. As the result of that sampling event, a single elevated lead sample in soils was identified (SB03 and the duplicate); all organic compounds are below the VRP Tier II non-residential soil criteria for surface and subsurface soils. As the result of the elevated lead (14,500 PPM and 14,100 PPM in the duplicate), including elevated lead in a downgradient groundwater sample at an offsite property (asphalt plant), IGC will retain a groundwater sample from a pizometer placed between its property and the downgradient well to determine if the elevated lead is coming from the property in question. If lead is not detected in this groundwater sample IGC will proceed to formally enter the VRP (by signing the VRA), investigate and identify the extent of lead impact in subsurface soils and remediate accordingly and – by doing so in accordance with the VRP, receive a covenant not to sue for lead in subsurface soils, thereby removing this property from the CERCLIS list – or at least, understanding that formal removal from the "list" has not occurred in the past, have the site placed on the "no further action" list/status.

Page 2 – Ms Dorsey, Mr. Atkins RE: Indiana Gas Company, Inc., Clarksville Service Center

Thank you for your assistance in organizing and participating in the meetings which went into establishing the criteria for moving this site to resolution. If your understanding of the circumstances differs in any way, please call me immediately as we are going to proceed with sampling the groundwater tomorrow.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. J. Mahoney", is written over the typed name and title.

R. J. Mahoney, CHMM
Director of Environmental Affairs

C: A. Robertson, VRP, IDEM; B. Giles, SIS, IDEM

Pace Analytical

Pace Analytical Services, Inc.
7726 Moller Road
Indianapolis, IN 46268

Tel: 317-875-5894
Fax: 317-872-6189

September 17, 1999

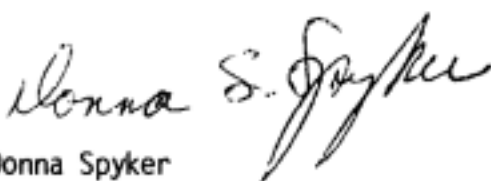
Mr. Richard Nelson
Indiana Energy, Inc.
6399 Zionsville Road
Indianapolis, IN 46268

RE: Pace Project Number: 505278
Client Project ID: Clarksville

Dear Mr. Nelson:

Enclosed are the results of analyses for sample(s) received on September 10, 1999. If you have any questions concerning this report, please feel free to contact me.

Sincerely,


Donna Spyker
Project Manager

Enclosures

REPORT OF LABORATORY ANALYSIS

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Pace Analytical

Pace Analytical Services, Inc.
7726 Moller Road
Indianapolis, IN 46268

Tel: 317-875-5894
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DATE: 09/17/99
PAGE: 1

Indiana Energy, Inc.
6399 Zionsville Road
Indianapolis, IN 46268

Pace Project Number: 505278
Client Project ID: Clarksville

Attn: Mr. Richard Nelson
Phone: 876-5034

Solid results are reported on a wet weight basis

Pace Sample No:	50260066	Date Collected:	09/09/99	Matrix:	Water
Client Sample ID:	CLARKSVILLE #1	Date Received:	09/10/99		

Parameters	Results	Units	PRL	Analyzed	Analyst	CAS#	Footnotes
.....

Metals

Metals, Dissolved, ICP		Method: EPA 6010			Prep Method: EPA 3010
Lead, Dissolved	ND	mg/l	0.05	09/17/99 VKJ	7439-92-1
Date Digested				09/14/99	

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Indianapolis, IN 46268

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DATE: 09/17/99
PAGE: 2

Pace Project Number: 505278
Client Project ID: Clarksville

Pace Sample No:	50260074	Date Collected:	09/09/99	Matrix:	Water
Client Sample ID:	CLARKSVILLE #2	Date Received:	09/10/99		

Parameters	Results	Units	PRL	Analyzed	Analyst	CAS#	Footnotes
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Metals

Metals, Dissolved, ICP		Method: EPA 6010			Prep Method: EPA 3010
Lead, Dissolved	ND	mg/l	0.05	09/17/99	VKJ 7439-92-1
Date Digested				09/14/99	

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PARAMETER FOOTNOTES

ND	Not Detected
NC	Not Calculable
PRL	Pace Reporting Limit

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Tel: 317-875-5894
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QUALITY CONTROL DATA

DATE: 09/17/99
PAGE: 4

Indiana Energy, Inc.
6399 Zionsville Road
Indianapolis, IN 46268

Pace Project Number: 505278
Client Project ID: Clarksville

Attn: Mr. Richard Nelson
Phone: 876-5034

QC Batch ID: 6905
Analysis Method: EPA 6010
Associated Pace Samples:

QC Batch Method: EPA 3010
Analysis Description: Metals, Dissolved, ICP
50260066 50260074

METHOD BLANK: 50262823
Associated Pace Samples:

Parameter	Units	50260066	50260074 Method Blank Result	PRL	Footnotes
Lead, Dissolved	mg/l		ND	0.05	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 50262831 50262849

Parameter	Units	50260066	Spike Conc.	Matrix Spike Result	Spike % Rec	Matrix Sp. Dup. Result	Spike Dup % Rec	RPD	Footnotes
Lead, Dissolved	mg/l	0	1.000	0.9279	92.8	0.9250	92.5	0	

LABORATORY CONTROL SAMPLE: 50262856

Parameter	Units	Spike Conc.	LCS Result	Spike % Rec	Footnotes
Lead, Dissolved	mg/l	1.000	0.9145	91.5	

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Indianapolis, IN 46268

Tel: 317-875-5894
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DATE: 09/17/99
PAGE: 5

Pace Project Number: 505278
Client Project ID: Clarksville

QUALITY CONTROL DATA PARAMETER FOOTNOTES

Consistent with EPA guidelines unrounded concentrations are displayed and have been used to calculate % Rec and RPD values.

ND	Not Detected
NC	Not Calculable
PRL	Pace Reporting Limit
RPD	Relative Percent Difference

REPORT OF LABORATORY ANALYSIS

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