

Axelson, John

From: Axelson, John
Sent: Wednesday, April 14, 2010 8:43 AM
To: 'Scott Stapp'
Cc: 'Gottsegen, Thomas E'; Paul Stefan; James Weber; David Hooker; Baldwin, Debbie; Lindblom, Steven
Subject: RE: change in procedure

Scott,

Thank you for the update. COGCC concurs with your request for an extension to complete remediation. Because you have already submitted a Site Investigation and Remediation Workplan (Form 27) that was approved, I will need a revised remediation plan. It is not necessary to fill out another Form 27, but a detailed plan for land farming is required. At a minimum, it should include the following information - Reference COGCC Rule 907.e.(2):

- Site diagram depicting the area where the material will be treated.
- Diagram and discussion of treatment area including liner and stormwater controls. If liner is not going to be used under the treatment area, confirmation samples of underlying native soil will be required at the termination of the landfarm.
- Discussion of bioremediation including volume of material, a schedule for aerating and moisturizing as well as quantities and types of nutrients that will be added to enhance biodegradation. Also, include information regarding the thickness of the material = no deeper than equipment can sufficiently till for aeration.
- Sampling and analysis plan – once the waste has been excavated and placed, a sufficient number of representative soil samples need to be collected to characterize contaminant levels at the start of landfarming. A suggestion would be one composite sample to represent each 50 cubic yards of material. Each sample should be analyzed for TPH, BTEX, PAHs, inorganics and metals.
- Samples shall be collected again at the end of the first season to establish the rate of biodegradation. Final confirmation samples will also be required verifying that Table 910-1 standards have been met prior to re-use of the treated material.
- Provide written surface owner approval for the land treatment.

Because most progress in landfarming is made in the warmer months in Colorado – time is of the essence. Please submit the revised remediation plan by the original due date set to complete remediation - April 30, 2010. Also provide a schedule to begin excavation and placement of material beginning in May 2010.

If you have any questions please give me a call.
Thank you,

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John Axelson, P.G.
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From: Scott Stapp [mailto:[sstapp@mepco.us.com](mailto:ssstapp@mepco.us.com)]
Sent: Wednesday, April 14, 2010 6:07 AM
To: Axelson, John
Cc: 'Gottsegen, Thomas E'; Paul Stefan; James Weber; David Hooker
Subject: change in procedure

John,

This email is a follow-up to our phone conversation last week which we discussed the change in our procedure in cleaning up the Schwake pit in Section 6-11N-52W Logan co., CO. We have received several bids on hauling the contaminated soil and disposal, which have proven to be cost prohibitive. We are now pursuing the option of land farming. Due to the change in the clean up procedure meeting the completion deadline of April 30th is not possible, I request an extension in order to start the land farming.

Thank you,

Scott Stapp

Merchant Energy Partners, LLC

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