
From: Canfield, Chris

Sent: Monday, February 06, 2012 12:29 PM

To: 'Blaney, Karolina'

Cc: Lujan, Carlos

Subject: RE: Cottonwood Frac Pit - Spill remediation/closure report - revised Form 27

Importance: High

Karolina,

I approve relocating, per the BLM's request, contaminated soil excavated from the Cottonwood Gulch Frac Pit to the DOE 1-W-28 cuttings treatment area for land farming. Meanwhile, we will review the balance of the subject Form 27 and either Carlos or I will contact you with questions or comments, if any, upon completion of that review.

Chris

Chris Canfield, P.G.
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From: Blaney, Karolina [<mailto:Karolina.Blaney@williams.com>]
Sent: Monday, January 30, 2012 4:48 PM
To: Canfield, Chris
Cc: Lujan, Carlos
Subject: Cottonwood Frac Pit - Spill remediation/closure report - revised Form 27

Chris,

Per our phone conversation this afternoon, attached is the revised Spill Remediation/Closure Report - Form 27 for the Cottonwood frac pit (Release tracking # 2216701). As requested by BLM, we need to relocate the contaminated soil that was excavated during the pit remediation to the DOE 1-w-28 cuttings treatment area where it will be landfarmed. I included that information in the "management of stockpile material" section; page 7 of the report.

I understand that there is a lot of information that needs to be reviewed before this Form 27 could be approved (analytical reports, sampling locations) therefore; would it be possible to receive your permission via email to relocate that material? BLM will not allow us to use the frac pit without relocating that dirt first (both, the Cottonwood frac pit and the DOE 1-W-28 area are located on BLM land).

Please let me know what you think.
Thank you so much for your help,

Karolina Blaney
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karolina.blaney@wpxenergy.com



From: Blaney, Karolina
Sent: Tuesday, November 08, 2011 12:54 PM
To: 'Canfield, Chris'
Cc: 'Lujan, Carlos'; 'Deranleau, Greg'
Subject: RE: Pit upgrades - phone conversation

Chris,

Attached is the spill remediation/closure Form 27 for the Cottonwood Pit contamination (Release tracking # 2216701) that you requested on 11/2/11. Please let me know if this submittal is what you had anticipated. I will submit the sundry notice Form 4 with the new pit dimensions and the new liner specifications after you assign the release remediation number.

Thank you for your help with this project,

Karolina Blaney

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From: Canfield, Chris [<mailto:Chris.Canfield@state.co.us>]
Sent: Thursday, November 03, 2011 10:09 AM
To: Blaney, Karolina
Cc: Deranleau, Greg
Subject: RE: Pit upgrades - phone conversation

Karolina,

It looks to me like you've got it. Regarding your Form 27, be sure you state that per Rule 910.b.(3).E., you're collecting and analyzing samples for SAR, EC, and pH. Remember that rule also requires comparison of those results with samples of non-impacted soils from nearby locations.

Also, remember the Form 27 is your opportunity to request per Rule 910-b.(3).C., a reduced list of target analytes in consideration of site-specific conditions and process knowledge. In this situation, that might translate into a request to analyze your samples for the above-mentioned parameters (which are required by rule) and total volatile and extractable hydrocarbons as a proposed (by you through your Form 27) indicator parameter. If you do that, it's a good idea to embed a decision rule stating that if you exceed the Table 910-1 concentration for TPH, you'll then analyze samples by 8260 and 8270 for the full Table 910-1 list of hydrocarbons. However, if you're below the bright line for a pre-approved indicator, you'd be done without having to utilize the GC/MS methods. The key here is pre-approval to avoid unnecessary rework. In this specific situation however, and based on our conversation yesterday, I will approve the use of a reduced list of target analytes. Please consider this e-mail to be verification of my approval.

Thanks,

Chris

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From: Blaney, Karolina [<mailto:Karolina.Blaney@williams.com>]
Sent: Thursday, November 03, 2011 8:14 AM
To: Canfield, Chris
Cc: Deranleau, Greg
Subject: Pit upgrades - phone conversation

Chris,

Please see the summary of yesterday's phone conversation regarding the Cottonwood pit remediation, and let me know if I missed or misinterpreted anything:

1. Submit Spill/Release Notice of Completion - Form 27
 - a. Include the Spill tracking number
 - b. Attach the clean-up confirmation analytical reports
 - c. Include the Form 4 for arsenic "variance" – Per your suggestions, one additional composite sample was collected from the excavated stockpiled material and analyzed for arsenic. That sample will then be compared with the background results that were collected from the pit wall after excavation.
2. Once the Form 27 is submitted, COGCC will assign a new remediation number for this project
3. Submit Form 4 with the upgraded liner system and new plats;
 - a. Reference that a historical release was discovered and include spill tracking number and remediation number

Please let me know if this sounds accurate. I will apply the same process for the GV 88-1 pit (reported to you by Mark Mumby on Tuesday) and the remaining pits that we will be upgrading in the future.

Thank you for your help with this project,

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