
From: Bob Koelbl [mailto:bob@framamericas.com]
Sent: Thursday, June 14, 2012 8:17 AM
To: Spry ORourk, Linda
Subject: Re: Sundry 2215084

Good morning Linda, welcome back from vacation. Fram has decided that it would like to withdraw this Sundry for land farming. Is this e-mail sufficient or do I need to submit something else?

Bob Koelbl, Landman
Fram Americas, LLC
30 E. Pikes Peak, Ste. 283
Colorado Springs, CO 80903
719-355-1320 Fax. 719-314-1362

From: [Spry ORourk, Linda](#)
Sent: Wednesday, June 06, 2012 1:50 PM
To: [Robert Koelbl](#)
Cc: [Westerdale, Barbara](#) ; [Fischer, Alex](#)
Subject: Sundry 2215084

Bob,

Hi. I am glad to receive your contact information; I have not had a contact since Harold left. I apologize for the email communication, but I am not in a position today to make phone calls and will be out of the office for the next several days. However I wanted to

respond to you regarding the processing of this sundry.

This Fram sundry requests a “variance” for ec levels and consideration of background for the arsenic levels. Our rules require that in the case of a request for a “variance”, CDPHE must be consulted, the Director must approve the variance, and my understanding is that very few if any have been approved. The time required for a variance to be approved is significant also.

I don't see the depth of sample collection for the pit sample. EC concentrations are most important within the upper 3 feet, because they affect vegetative regrowth. The depth at which the pit sample was collected is important in considering approval of this sundry.

Before requesting a “variance” (if the pit sample was collected at a depth less than 3 feet), a quicker approach might be to collect some background samples for ec to demonstrate that the pit sample falls with 2 times background, as is allowed by Table 910-1. I would suggest that Fram withdraw this sundry and resubmit it with request for either a “waiver” or “consideration of background in lieu of Table 910-1 levels” for both arsenic and ec. We request that a little background study, similar to the arsenic background study, be included to support the request for ec; we typically suggest 3-5 discrete samples, from a similar depth (if possible) as the pit samples with elevated ec.

When you resubmit the sundry, please email it to this email account:

ogcc.envirosundry@state.co.us.. By using this account, the sundry will be routed to the appropriate queue. I will be on vacation soon, but others will have access to the sundries while I am gone if you use this address.

Thanks.

Linda Spry O'Rourke
Environmental Protection Specialist, Northwest Region
Colorado Oil & Gas Conservation Commission
707 Wapiti Court
Suite 204
Rifle, CO 81650

(970) 625-2497 Office

(970) 625-5682 Fax

(970) 309-3356 Cellular

linda.spryorourk@state.co.us