
From: Fischer, Alex

Sent: Tuesday, September 11, 2012 12:53 PM

To: 'Terry Cammon'

Cc: Bill Warburton; Reese FLiniau; Bill Scofield; 'Randy Miller'; Neidel, Kris

Subject: RE: Allard Pit Closure Amendment

Terry,

I apologize for not responding sooner. I was at the Allard 30-8-5 location on August 31, 2012 and collected a sample from the bottom of the pit. Please see attached pictures. I had the sample analyzed for the typical hydrocarbon components: benzene, toluene, ethyl benzene, xylenes (BTEx), gasoline range organics (GRO), and diesel range organics (DRO). Please see attached analytical results.

As one can see, benzene and the total petroleum hydrocarbons exceed the table 910-1 concentrations. Please provide a status and schedule for remediating and closing the pit per Remediation Number 6937 and the approved Form 27s as they relate to this facility (Facility ID: 115269).

Thanks

Alex

Alex Fischer, P.G.

Environmental Supervisor - Western Colorado

Colorado Oil and Gas Conservation Commission

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(303) 894-2100 ext. 5138

(303) 894-2109 fax

alex.fischer@state.co.us

From: Terry Cammon [<mailto:tcammon@doccolo.com>]

Sent: Tuesday, August 28, 2012 10:33 AM

To: Fischer, Alex

Cc: Bill Warburton; Reese FLiniau; Bill Scofield

Subject: RE: Allard Pit Closure Amendment

Alex:

I was on the Allard 30-8-5 location, extended workover, installing a tubing rotator etc Aug.17-21st. I also personally addressed the pit issue with Reese.

The pit looked like a farm pond, no oil, a few clods with oil near the banks. There was roughly, 1 ½-2' water in the pit. I ordered a backhoe to dig a "sump", remove the water with a vac truck and see what we have, leaving the dregs on the inside banks. The bottom of the pit is iron sulfide and pond muck. My concern is the iron sulfide, common in a lot of wells, treaters, tanks, and pits, is mistaken for oil. It is very black, but not oil. When exposed to the atmosphere and sun, the iron sulfide turns gray. But, oil molecules do adhere to iron sulfide, and when we dug the sump, we did see a small sheen of oil suddenly appear. There was no sheen or oil on the pit water, prior to digging.

The sump or intersect ditch, in the bottom of the pit has water in it. I do not believe the pit will dry further and we are seeing the current "dry weather" water table.

I had similar concerns that iron sulfide was the problem with the North most piles of dirt, removed earlier from the pit, and stockpiled on the old Diamond "J" tank battery site. Those piles had no evidence of oily soil. The rear ones did. I had the backhoe operator spread the two north piles, inside the fenced area, and determine if iron sulfide was also the problem. Reese has checked it and said it also was gray, no oil.

I recommend/suggest the following POA:

- 1) Fill in the Allard Pit with clean fill dirt and level same.
- 2) Haul off the South two dirt piles @ the Diamond J battery site, to the Routt County approved land farm site.
- 3) Level, reseed/reclaim the Diamond J battery site
- 4) Close the file on the pit/reclamation issues.

Let me know if you agree, and we will schedule the work.

T.J. Cammon

Terry J. Cammon
President
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From: Fischer, Alex [<mailto:Alex.Fischer@state.co.us>]
Sent: Tuesday, August 28, 2012 6:55 AM
To: Terry Cammon; Bill Warburton
Cc: Randy Miller; Neidel, Kris
Subject: FW: Allard Pit Closure Amendment

Please provide a status of schedule.

Thanks
Alex

Alex Fischer, P.G.
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From: Fischer, Alex

Sent: Thursday, May 31, 2012 12:19 PM
To: Scan, OGCC
Cc: 'Bill Warburton'; 'Terry Cammon'; Randy Miller
Subject: FW: Allard Pit Closure Amendment

Amber-Please data enter this 27A (updated plan), approve by Alex, and associate with Facility ID: 115269, tracking Number 1949103, REM Number 6937.

Thanks
Alex

Alex Fischer, P.G.
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Colorado Oil and Gas Conservation Commission
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From: Bill Warburton [<mailto:wlw@doccolo.com>]
Sent: Thursday, May 31, 2012 10:19 AM
To: Fischer, Alex
Cc: 'Terry Cammon'
Subject: FW: Allard Pit Closure Amendment

Alex:
Attached is the Amended Form 27 you requested. We have Randy Miller monitoring the situation and will move forward as soon as we can.
Bill

No virus found in this message.
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Version: 2012.0.2171 / Virus Database: 2425/5036 - Release Date: 05/31/12