

From: [Fischer, Alex](#)
To: ["Steven Shute"](#); [EnviroScan, OGCC](#)
Cc: [Randy Miller](#); [Vernetta Mickey](#); [Neidel, Kris](#)
Subject: RE: Treater Overflow Pit ID 115241
Date: Friday, October 05, 2012 2:42:05 PM

Amber-please upload this to Facility ID 115241.

Steve,

Last Friday (September 28, 2012) I left you a voice mail regarding backfilling of the pit. As I don't want to hold up activities, please proceed with backfilling as you have outlined in your plan.

Backfill: The water level has fallen 2-3 ft since late July, due to the ditch now being dry. We will collect some more exposed HC soil around the edges, by hand since it's now too steep and unreachable by an excavator. There is a substantial pile of "clean" dirt along the east side of the road, taken from the uncontaminated dikes around the Pit. There is also excess dirt cleaned out of the irrigation ditch by the ditch co. We will pump out the water into the processing plant, then backfill using this dirt starting on the south edge, up above the ground water level at expected "high tide", and bolstering the adjacent pond dikes. If this onsite material isn't enough, we can supplement from the quarry on the north end by the barn. We plan to have this done before winter. Next spring we can evaluate how much further to fill and re-contour.

I will be reviewing the Form 27 submitted and provide comment and clarification on the ground water monitoring.

I appreciate the effort Lone Pine has and continues to take in addressing the pit closure and compliance.

Thanks
Alex

Alex Fischer, P.G.
Environmental Supervisor - Western Colorado
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203
(303) 894-2100 ext. 5138
(303) 894-2109 fax
alex.fischer@state.co.us

From: Steven Shute [mailto:pipeline@rof.net]
Sent: Friday, September 21, 2012 6:27 PM
To: Fischer, Alex
Cc: Randy Miller; Vernetta Mickey; Neidel, Kris

Subject: Treater Overflow Pit ID 115241

Alex,

Attached is a Form 27 for final disposition of the main Lone Pine Pit, ID 115241 and your Remediation No. 7149.

This Form 27 supplements and updates the Form 27 submitted by Randy Miller on July 25, with further details in his July 20 email. We received the analyses of water and excavated soil transmitted to you on August 9 with your response August 20 in the email string below. Please read the details below, and comment if I've missed something significant.

The Pit was excavated as far as practical in July, as wide as we could dig without compromising the dirt walls of Ponds 1-2-3, and stopping at the water level below which excavation was much more hazardous. There is a relatively small amount of remaining soil which exceeds 500 ppm of TPH, however the hydrocarbon seems to be predominately thick, heavy weathered crude oil which is not moving through the soil. The nearby monitoring well showed very little HC indication after 40 years of Pit use.

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Oiled soil: As previously discussed, we have investigated the various options for remediation or disposal of ~2000 cu yds of contaminated soil from this and the Noffsinger pit. We evaluated onsite incineration by 3 different contractors using gas from our well, vs hauling 80 miles to the landfill at Milner, CO, vs 150 miles to Waste Mgmt at Ault CO. Unbelievably, the economics are not even close, strongly favoring Ault.

I am disturbed by this: each truckload of about 20T at 5000 ppm would be about 200 lbs of TPHCs. The 300 mile round trip will consume about 60 gls or 429 lbs of Diesel fuel,

along with concomitant emissions. The much-displaced dirt will stay contaminated but will be entombed forever, and we'll have to supplement soil from somewhere to re-contour as needed. That's not logical.

County manager / Co School of Mines geologist Kent Crowder suggested we get a gas-fired rotary dryer or kiln used for mining, with direct gas-fired flame through the tumbling material to burn off HCs down to a level suitable for re-use onsite. Emissions would be less than burning diesel to move dirt to Ft Collins.

The oiled soil isn't going anywhere, nearly bone-dry and piled deep and surrounded by berms. Lone Pine will get 4" of moisture / snow in the next 6 months. We'd like to run this option to the ground, to see if there is a suitable used unit available, before we declare defeat and start trucking.

The Pit was a 40-year affront to the environment that the present owners didn't initiate, nor contribute significantly toward. We're not comfortable with the long-haul + bury option, and ask your counsel on this.

Steve Shute
970-928-9208

From: Fischer, Alex
Sent: Monday, August 20, 2012 12:07 PM
To: 'Randy Miller'
Cc: 'Steven Shute'; Neidel, Kris
Subject: FW: Treater Overflow Pit ID 115241

Randy,

We agree with your recommendations regarding documenting the pit footprint and backfilling. The updated Form 27 should capture details to include:

- Explanation stating the reason(s) for leaving impacted material in place;
- A schedule and timeline of when backfilling activities will begin and end;
- Source for clean fill;
- Schedule and timeline for addressing the 2000-2500 cy of impacted material temporarily being stockpiled at the two well locations (Margaret Spaulding 4 and Margaret Spaulding 14) Location ID: 324634
- A monitoring and sampling plan of the groundwater monitoring wells installed. This should include the frequency water levels from monitoring wells be measured and frequency of sampling the groundwater monitoring wells. The wells should be sampled and analyzed for those constituents

above the 910-1 that are being left in place (at this time) as well as well as total recoverable iron. The four (4) treatment ponds and effluent from the last pond should also be included in this monitoring program until there is enough data (perhaps 4-8 quarters) demonstrating that the impacted material left in place is or is not migrating from the source left in place.

Thanks

Alex

Alex Fischer, P.G.

Environmental Supervisor - Western Colorado

Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801

Denver, CO 80203

(303) 894-2100 ext. 5138

(303) 894-2109 fax

<mailto:Margaret.ash@state.co.us>

From: Randy Miller [<mailto:randy@npeng.com>]

Sent: Thursday, August 09, 2012 8:43 AM

To: Fischer, Alex

Cc: Steven Shute

Subject: Treater Overflow Pit ID 115241

Alex,

Please find the attached analytical report for the remaining soils in the Treater Overflow Pit Fac ID 115241.

As we expected, contamination remains in the soils around and below the excavation (which extends to 35 feet below ground surface. My recommendations are as follows:

1. Document the precise location of the excavation and backfill with the clean soil from the banks of the pit. Bank material on the North and West sides can be used to get the pit filled in above the ground water level.
2. Remove/recycle the contaminated soil (2000 - 2500 cy) and fill the remainder of the pit with recycled or clean fill as funds allow from Lone Pine Gas.
3. Develop a monitoring/sampling plan for the existing monitoring wells down gradient of the pit area. I would estimate that 99% of the contaminated soil has been removed from the pit and the remainder is not going to present any immediate danger to the ground water or surface water in Spring Gulch. This is evidenced by the monitor well samples collected on 4/17/12 that were well below the COGCC action levels, which was before any of the pit soil was removed (and had been in place for 40 years).

Thank you and let me know your thoughts,

----- Forwardedmessage-----

From: <tantalek@acz.com>

Date: Wed, Aug 8, 2012 at 2:36 PM

Subject: ACZ Laboratories Project L95687 Final Report and EDD
To: pipeline@rof.net
Cc: randy@npeng.com

Attached is the final report for project 'L95687'.

The report is in Adobe's Portable Document Format (PDF). Adobe Acrobat Reader is available at no charge at:

<http://www.adobe.com/products/acrobat/readstep2.html>

Please feel free to contact me should you have any questions about your report. For fastest service, please refer to your project number in any correspondence.

Regards,

Tony Antalek
ACZ Project Manager
tantalek@acz.com
970-879-6590 ext 107
<http://www.acz.com>

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Randy Miller, President

North Park Engineering & Consulting, Inc.

PO Box 395
Walden, CO 80480

970-218-4974 (cell)
970-723-3725 (office)
970-723-8420 (fax)