



**Re: Subject: Reserve Pit Closure for the Anderson 7-12 Reserve Pit (Location ID: 334550), No document number provided by the COGCC for 2012 correspondence.**

2 messages

**Spry ORourke, Linda** <linda.spryorourke@state.co.us> Thu, Oct 11, 2012 at 12:21 PM  
To: OGCC EnviroScan <ogcc.enviroscan@state.co.us>  
Cc: Blair\_Rollins@oxy.com, "Lujan, Carlos" <Carlos.Lujan@state.co.us>, Chris\_Clark@oxy.com, Daniel\_Padilla@oxy.com, Igriffin@walshenv.com, Chris Canfield <chris.canfield@state.co.us>

Blair and Daniel,

Thanks for the additional data and the summary of submittals. I have added some clarification to the paragraph of the submittal summary to complete the record. The paragraph is copied here with my responses indented in italics.

Oxy originally submitted two sundry notices requesting closure of the Anderson 7-12 reserve pit in 2010, one in January and the other in October, without response from the COGCC. The COGCC only posted one of the two 2010 sundry notices on their database (reference document number 2221972).

*COGCC response: COGCC acknowledges that the 1/28/2010 version of the sundry, with 'Detail of Work' section listed as 'apply different table 910 standards' was not entered into the COGCC database. The 10/8/2010 version, with 'Details of Work' section listed as 'Reserve Pit Closure notice' was not entered into the database at the time it was submitted.*

To generate a response from the COGCC, Oxy resubmitted both sundry notices on 01/09/2012.

*COGCC response: On January 9, 2012 Oxy resubmitted both the 1/28/2010 and 10/8/2010 versions of the sundry, which were entered into the database with document numbers 2221972 and 2221973 the day they were received. Sundry 2221973 was subsequently withdrawn from the database, since it was superseded by sundry 2221972 for the same activity at the location. An email requesting additional information was sent out (and responded to) on January 9, 2012, which included the information that the sundry number that was retained in COGCC's database was 2221972.*

The COGCC responded via email requesting additional closure information which Oxy provided under sundry notice on 01/17/2012. No response or follow-up request was received by the Oxy from the COGCC (also no document numbers were provided by the COGCC for the 2012 correspondence).

*COGCC Response: Linda Spry O'Rourke responded to Lily Griffin, cc'd to Blair Robbins and Daniel Padilla, on January*

18, 2012 acknowledging receipt of the January 17, 2012 sundry OXY's tracking spreadsheet reports that OXY received acknowledgement of sundry receipt from Alex Fischer on January 18, 2012. The 1/17/2012 sundry submission did not reference the previous sundry# (2221972), as was requested in COGCC's 1/9/2012 email requesting additional information. The document number associated with the January 17, 2012 sundry is 2597041. COGCC acknowledges that due to internal miscommunication, the January 17, 2012 sundry was not entered into the database at the time and the assigned sundry number was not transmitted to OXY.

Regarding the additional information supplied, it does meet my request for clarification.

Amber, please approve Sundry 2221972 with the following note:

"Sundry 2221972 is approved in the COGCC system, but does not grant approval of the pit closure, pending additional information that was requested."

Also, please approve Sundry 2597041 with the following COA:

"I have reviewed the data submittals for the Colorado Oil and Gas Conservation Commission (COGCC) sundries 2221972 and 2597041 and supplemental information provided on 10-5-2012. Based on the information provided, the COGCC staff approves the pit closure. However, should future conditions at the site be discovered of contaminant concentrations in soils exceeding COGCC standards or if ground water is found to be significantly impacted, then OXY may be required to conduct further investigation and/or remediation at the site."

Please relate this email and the attached file from 10-5-2012 to Sundry 2597041.

Thanks

**Linda Spry O'Rourke**

**NW EPS II**

State of Colorado, Oil & Gas Conservation Commission

707 Wapiti Court, Rifle, CO 81560

office: 970.625.2497 | cell: 970.309.3356

email: [linda.spryorourke@state.co.us](mailto:linda.spryorourke@state.co.us)

*\*Please Note: As of Oct. 8, 2012, my email changed to [linda.spryorourke@state.co.us](mailto:linda.spryorourke@state.co.us) (adding the final 'e' in my last name). Please update your address book accordingly. Thank you!*

On Fri, Oct 5, 2012 at 4:00 PM, <[Blair\\_Rollins@oxy.com](mailto:Blair_Rollins@oxy.com)> wrote:

Dear Linda,

As agreed to in our August 22, 2012 Legacy Pit Closure meeting, Oxy is providing you the following reserve pit closure documentation for the above referenced location.

Closure of the Anderson 7-12 reserve pit is in compliance with the COGCC 1000 Series Rules, specifically 1003.d (Drilling Pit Closure), which requires that COGCC Table 910-1 concentration levels are met. Please note that multiple sundry and/or email and meeting correspondence occurred between Oxy and the COGCC between 2010 and 2012. Oxy attempts to capture in this email, the associated correspondence and resolution with the ultimate goal being to provide adequate closure documentation for the

Anderson 7-12 reserve pit.

Oxy originally submitted two sundry notices requesting closure of the Anderson 7-12 reserve pit in 2010, one in January and the other in October, without response from the COGCC. The COGCC only posted one of the two 2010 sundry notices on their database (reference document number 2221972). To generate a response from the COGCC, Oxy resubmitted both sundry notices on 01/09/2012. The COGCC responded via email requesting additional closure information which Oxy provided under sundry notice on 01/17/2012. No response or follow-up request was received by the Oxy from the COGCC (also no document numbers were provided by the COGCC for the 2012 correspondence). During the August 22, 2012 meeting, the 01/17/2012 sundry submittal was specifically discussed for closure. The enclosed information details the final closure 7-12 Reserve documentation agreed upon in the meeting.

In accordance with the Legacy Pit Closure meeting held on 08/22/2012, Oxy is submitting the attached documentation as information requesting to close the Anderson 7-12 reserve pit, under the 01/17/2012 submitted sundry notice (no COGCC assigned document number). Included as part of the reserve pit closure documentation:

- Oxy's Anderson 7-12 reserve pit sampling narrative
- Anderson 7-12 reserve pit tabulated data
- Supporting lab analytical data package reflecting the tabulated data
- Anderson 7-12 sampling map

Please let Daniel or me know if sufficient information has been provided to close the reserve pit or if you require additional information.

Thank you,

Blair Rollins  
Support Contractor for Oxy Regulatory Department  
By: Walsh Environmental Scientists and Engineers, LLC  
(970) 263-3688 - Office  
(970) 985-1861 - Cell

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 **Anderson 7-12 sampling narrative 10 5 12.pdf**  
834K

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**Spry ORourke, Linda** <linda.spryorourke@state.co.us> Fri, Oct 12, 2012 at 9:39 AM  
To: OGCC EnviroScan <ogcc.envirosan@state.co.us>  
Cc: Blair\_Rollins@oxy.com, "Lujan, Carlos" <Carlos.Lujan@state.co.us>, Chris\_Clark@oxy.com, Daniel\_Padilla@oxy.com, lgriffin@walshenv.com, Chris Canfield <chris.canfield@state.co.us>

Daniel and Blair,

Attached are signed copies of the two sundries I asked Amber to approve below.

Amber, please use these to complete the approval task and load images to appropriate sundry number. Also,

please associate the attached email chain with Sundry 2221972, titled 'Correspondence with Oxy 1-9-2012" and note that receipt date is 1-9-2012.

Thanks

**Linda Spry O'Rourke**

**NW EPS II**

State of Colorado, Oil & Gas Conservation Commission

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email: [linda.spryorourke@state.co.us](mailto:linda.spryorourke@state.co.us)

*\*Please Note: As of Oct. 8, 2012, my email changed to [linda.spryorourke@state.co.us](mailto:linda.spryorourke@state.co.us) (adding the final 'e' in my last name). Please update your address book accordingly. Thank you!*

[Quoted text hidden]

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**3 attachments**

 **RE\_ Anderson 7-12 Reserve Pit Sundries 1-9-2012.pdf**  
49K

 **2221972-Anderson7-12-s.pdf**  
8414K

 **2597041 Anderson 7-12-s.pdf**  
11130K