



Gary Gebauer #2, API #121-10379 Inspection #664000752 - Skim Pit Violations

1 message

Axelson - DNR, John <john.axelson@state.co.us>

Fri, Feb 22, 2013 at 2:24 PM

To: dan_ds rinc@cox.net

Cc: Kym Schure - DNR <Kym.Schure@state.co.us>, OGCC EnviroScan - DNR <OGCC.EnviroScan@state.co.us>, James Precup - DNR <James.Precup@state.co.us>

Mr. Richmond,

I inspected the referenced location recently and discovered that COGCC Field Inspector, Kym Schure had also done an inspection on Feb 4th. I wanted to follow up with you regarding the unlined skim pit violations he noted.

All skim pits in Colorado are required to be lined in accordance with Rule 904.a.(4). Although the operation of unlined skim pits has been a common occurrence, we have been working with many operators in Colorado to bring these pits into compliance over the last few years. The unlined earthen skim pit and corrugated culvert pipe pit can be properly closed in accordance with Rule 905 and replaced with other skimming equipment. You can also choose to remediate all of the contaminated soil surrounding the pits and properly line them in accordance with Rule 904.b. In either case, COGCC requires submittal of a Form 27 - Site Investigation and Remediation Workplan for approval prior to closure or upgrade activities in accordance with Rule 905.b.

There is currently quite a bit of oil being stored on the skim pit which is also a violation of Rule 323. To properly close/remediate the pits, all oily fluids need to be removed and properly disposed. All impacted soil needs to be removed and treated or disposed in accordance with Rule 907.e. After all of the soil is removed, confirmation samples need to be collected from the bottom of the pits and analyzed to verify compliance with Table 910-1 standards. Once all of the oily waste has been properly treated or disposed and the samples verify compliance, you can either close the pits or line them. If you choose to line them, a Form 15 pit permit will also be required.

The inspection had a deadline of March 31, 2013, to address the pit violations. Please submit the Form 27 no later than that date. We realize it might take more time to finish all of the cleanup, sampling and waste disposal, but the first step is to get the Form 27 submitted so you can proceed with the work under an approved plan. You can give me a call if you have any questions about waste management, sampling requirements or the Form 27.

Thank you,

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John Axelson, P.G.
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Inspection #664000752 - Correspondence