



Peck A-1, NENE Sec 15, T1N R54W, API #05-121-06755, Location ID#317031, Facility ID #53797, NOAV #200376557, Remediation Project #7796

1 message

Eckman - DNR, Annie <annie.eckman@state.co.us>

Tue, Jun 4, 2013 at 2:23 PM

To: s.d.james@worldnet.att.net, Brian Dodek <bdodek@ltenv.com>

Cc: "Axelson - DNR, John" <john.axelson@state.co.us>, "EnviroScan, OGCC" <OGCC.EnviroScan@state.co.us>

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Mr. James,

COGCC has received the Form 27 Site Investigation and Remediation Plan for the above referenced location submitted on your behalf by LT Environmental. I have discussed the pit closure plans with Brian Dodek of LTE for clarification; the Form has been approved with the following conditions (COAs):

- Following the construction of berms sufficient to isolate and dry out the entire former skim pit location in the southeast corner of the active produced water pit, remove any oily soils and collect sufficient confirmation soil samples;
- All soils shall be analyzed for Total Petroleum Hydrocarbons (Diesel Range Organics and Gasoline Range Organics), Benzene, Toluene, Ethylbenzene, Total Xylenes, Electrical Conductivity, pH, and Sodium Adsorption Ratio to verify compliance with Table 910-1 parameters;
- The soil sampling results must be submitted for prior approval before backfilling or re-use of the skim pit location for other use;
- Provide an analytical summary sheet/table comparing soil confirmation sample results to Table 910-1 Standards, accurate GPS coordinates for the pit, a sample location diagram on aerial photo image indicating the final excavation dimensions, the full laboratory analytical report, and a detailed explanation of the remediation project; and
- Submit an updated Pit Permit for this location.

In future, note that beneficial reuse of E&P waste (in this case, the soil from the skim pit and berms that was mixed and spread along the lease road) **must be approved by the Director (per Rule 907a3).**

- Reuse and recycling. To encourage and promote waste minimization, operators may propose plans for managing E&P waste through beneficial use, reuse, and recycling by **submitting a written management plan to the Director for approval on a Sundry Notice, Form 4**, if applicable. Such plans shall describe, at a minimum, the type(s) of waste, the proposed use of the waste, method of waste treatment, product quality assurance, and shall include a copy of any certification or authorization that may be required by other laws and regulations. The Director may require additional information.

Also as noted on the NOAV and recent inspection report, **pits may not be closed without the submittal of a Form 27 and COGCC prior approval as required by Rule 905.b.**

- Pits not used exclusively for drilling operations, buried or partially buried produced water vessels, and emergency pits shall be closed in accordance with an approved Site Investigation and Remediation Workplan, Form 27. The workplan shall be submitted for prior Director approval and shall include a description of the proposed investigation and remediation activities in accordance with Rule 909. Emergency pits shall be closed and remediated as soon as the initial phase of emergency response operations are complete or process upset conditions are controlled.

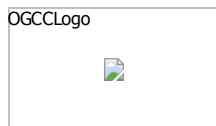
A copy of the approved Form 27 is attached. Refer to Remediation Project #7796 on future correspondence.

Please call John Axelson with any questions,

Annie Clements Eckman, PG for

John Axelson, PG

Environmental Protection Specialist, Northeast Region



1120 Lincoln Street, Suite 801

Denver, CO 80203

john.axelson@state.co.us

www.cogcc.state.co.us

Office: 303.637.7178

Cell: 303.877.9964

Fax: 303.637.7179

CC: Email correspondence

John,

LTE is submitting the attached Form 27 and Proposed Remediation Workplan letter, on behalf of Western Operating Company (WOC), for your review and approval. The documentation is in regard to the closure of an oil skim pit and an inactive produced water pit at the Peck A-1 tank battery located in the NENE Sec 15 T1N R54W 6th PM.

Please call Steve James with WOC ([303-893-2438](tel:303-893-2438)) if you have any questions regarding the site.

Thanks,

Brian

Brian Dodek, P.G.

Senior Geologist / Client Manager



COMPLIANCE / ENGINEERING / REMEDIATION

LT Environmental, Inc.
4600 West 60th Avenue
Arvada, Colorado 80003

(303) 433-9788 office

(303) 962-5535 direct

(303) 483-5486 cell

(303) 433-1432 fax
www.LTEnv.com
BDodek@LTEnv.com

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