



STATE OF
COLORADO

Lujan - DNR, Carlos <carlos.lujan@state.co.us>

Re: [Fwd: RE: [Fwd: Re: Coon Hollow 1] response from craig]

1 message

Lujan - DNR, Carlos <carlos.lujan@state.co.us>
To: Naomi <naomi@maralexinc.com>
Cc: "D. Craig Heydenberk" <esi.craig@sopris.net>

Wed, Nov 20, 2013 at 2:06 PM

Naomi,

Thanks for the clarifications. I don't have additional comments. I will switch the table as you requested.

I am not sure if you need to get BLM's approval to bio remediate within the pad but it will be good to check with them. If you were going to do the landfarming outside of the pad, in an undisturbed area, I would say that you need BLM's approval for sure. So, please check with BLM to be on the safe side.

Other than that, Leland's suggestion to cover the material with an impermeable material (doesn't need to comply with lining specs.) is an excellent idea, particularly now that rain and snow are in the forecast. And make sure you have a good stormwater management system in place (berms around the stockpile will do it).

I will enter the Form 27 without including any COA, given that you have addressed my concerns in your email below.

Seems like this is a project that we will be able to close shortly.

Thank you,
Carlos

Carlos A. Luján, Ph.D

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Please consider the environment prior to printing this e-mail...

On Wed, Nov 20, 2013 at 1:16 PM, Naomi <naomi@maralexinc.com> wrote:

Carlos,

Attached is a replacement for one of the attachments to the form 27 I sent. Craig says that the lab made some modifications. Can you please switch it out?
Below are Craig's response to your concerns.

Naomi

I will enter the Form 27 and generate a Remediation number to be used as a reference. I will add some comments or Conditions of Approval (COAs). For example, I noticed that you mention that Maralex is going to stockpile the material for 3 months to allow for bio-degradation to occur. First of all, probably no bio-degradation will occur during winter time. Micro-organisms will not be active because of the low temperatures. Second, For bio-degradation to occur, micro-organisms need oxygen, and a stockpile is not the appropriate way for providing oxygen throughout the whole volume of soil; Soil should be spread-out and landfarmed with landowner's approval (BLM?). Third, diesel is the heaviest of the GRO/DRO compounds and will take longer to bio-remediate. When was the pit excavated? Recently or during the summer? **Yes - We will spread the contaminated soil to about 1.5 feet inside the lined bermed containment. This will not be a problem as the volume of soil will be small. The excavation has not been scheduled with Jim. Sounds like we need BLM approval to bio-remediate before we proceed. Leland suggested that when we excavate that extra liner be provided to cover the pile during rain events. We will take confirmation samples with the intent to demonstrate that the material has been successfully bio-remediated.**

Other than that, plan is OK. Since DRO is the only parameter that exceeds Table 910-1 values, I agree that it will suffice to sample for BTEX, GRO and DRO and skip PAHs, metals, and inorganics. On the other hand, Please take discrete samples of the bottom of the pit (not composite). **This is not a problem – We will sample two discrete samples following excavation.** Composite samples will be OK from the stockpile, as long as samples are taken at a sufficient depth (halfway the thickness of the stockpile - if the stockpile is 6 feet deep, please take the sample at 3 feet below surface). **The anticipated quantity of soil will be small. Also anticipate the thickness of the contaminated soil stock pile to be less than 2-feet.**