



Terrace Compressor Station Pit, NWNW18 10N 58W, Facility #100035, Remediation Project #7392

1 message

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

Tue, Dec 24, 2013 at 1:28 PM

To: James Hix <jhix@olssonassociates.com>

Cc: "rick.allison@state.co.us" <rick.allison@state.co.us>, "john.axelson@state.co.us"

<john.axelson@state.co.us>, "William Lambert (william.lambert@whiting.com)" <william.lambert@whiting.com>,

"Mike Staab (Mike.Staab@Whiting.com)" <Mike.Staab@whiting.com>, "EnviroScan, OGCC"

<OGCC.EnviroScan@state.co.us>

Terrace Compressor Station Pit, NWNW18 10N 58W, Facility #100035, Remediation Project #7392

James,

COGCC has reviewed the closure report for the above referenced pit. Confirmation soil samples do not meet Table 910-1 standards for TPH (DRO), benzene, and benzo(a)pyrene.

- Per Rule 909 b (5), remediation shall be performed in a manner to mitigate, remove, or reduce contamination that exceeds the concentrations in Table 910-1 in order to ensure protection of public health, safety, and welfare, and to prevent and mitigate significant adverse environmental impacts. Soil that does not meet concentrations in Table 910-1 shall be remediated.

Despite the bedrock encountered at the bottom of the excavation, exposure to air during excavation, and absence of groundwater, the impacted soils must be remediated to 910-1 standards. COGCC does not currently authorize or approve of Risk Based Corrective Action, and a No Further Action determination for this Remediation Project will not be granted given elevated levels of TPH (DRO), benzene, and benzo(a)pyrene.

Related the co-mingling and land farming of the impacted soils from these two projects and Kern #43-33 Pit Facility # 117951, for your future reference:

- ***Per Rule 909 c (3), Operators must prepare and submit for prior Director approval a Site Investigation and Remediation Workplan, Form 27, for the land treatment of oily waste. This would be a separate Remediation Project, and Form 27. Also note that land treatment (land farming) must be conducted in accordance with Rule 907.e.(2).F.***
- ***Impacted soils can not be co-mingled or moved to an offsite facility for land treatment without prior COGCC approval. Per Rule 908 (a), Operators may establish non-commercial, centralized E&P waste management facilities for the treatment, disposal, recycling or beneficial reuse of E&P waste.***

Thank you,

Annie Clements Eckman, P.G., for

Rick Allison, P.G.

Environmental Protection Specialist - Northeast Colorado

Environmental Protection Specialist



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Cc: REM#7392

On Wed, Dec 18, 2013 at 3:34 PM, James Hix <jhix@olssonassociates.com> wrote:

Annie,

Whiting Petroleum disposed of the impacted soil stockpile from the Terrace Gas Plant and Terrace Compressor Station Pits at Waste Management's North Weld County landfill in Ault, Colorado. Originally the soil was to be land farmed at the Terrace Gas Plant location; however, Whiting decided to dispose of the soils offsite. Whiting requests closure for Facility #100035 (Remediation Project #7392) and for Facility #100036 (Remediation Project #7393).

James

James W. Hix, PG | **Olsson Associates**



From: Eckman - DNR, Annie [<mailto:annie.eckman@state.co.us>]

Sent: Monday, December 09, 2013 12:48 PM

To: James Hix

Cc: Rick Allison - DNR; EnviroScan, OGCC

Subject: Re: Kern 43-33 Pit, NESE 33 12N 62W, API #05-123-10268, Pit Facility #117951, Remediation Project #7391

Kern 43-33 Pit, NESE 33 12N 62W, API #05-123-10268, Pit Facility #117951, Remediation Project #7391

James,

COGCC has reviewed the assessment report submitted by Olsson on behalf of Whiting Petroleum for the above referenced location. Based on a review of the data presented, it appears that no further action is necessary related to the pit closure and tin horn impacts, aside from surface restoration. According to the report provided, impacted soils from this location have been co-mingled for land farming (land treatment) with soils from:

- **Terrace Compressor Station Pit, NWNW18 10N 58W, Facility #100035, Remediation Project #7392**
- **Terrace Gas Plant Pit, NWNE 18 10N 58W, Facility #100036, Remediation Project #7393**

*Please note for future reference: in cases where land treatment is proposed, a (separate) Form 27 should be submitted for approval by the Director. In lieu of the separate Form 27 for land treatment, the Remediation Project #7391 will be left open until completion of the land treatment of the impacted soils has been approved by COGCC staff. Given this, the following **additional Conditions of Approval for Remediation #7391, #7392, and #7393 apply:***

- **Land treatment shall be performed in strict accordance with COGCC Rule 907.e. (2);**
- **Perform routine maintenance to prevent contamination of stormwater runoff;**
- **Land treatment shall be documented semi-annual status reports due each year on January 31st and June 30th, beginning with an initial report due no later than June 30, 2013;**
- **The status reports shall include the following information: Type and volume of microbes, nutrients or other amendments added, dates the material was aerated, moisturized, maintained, etc; and**
- **Note that a minimum of one soil sample per each 2,500 cubic yards is required.**

Please note that Whiting will need to request both the closure of pit *and* NFA determination for the remediation project when land treatment has been completed. **Please reference both the pit number #117951 and the Remediation Project #7391 number on any future correspondence.**

Please contact me or Rick Allison if you have any questions.

Thank you,

Ann Clements Eckman, P.G., for

Rick Allison, P.G.

Environmental Protection Specialist - Northeast Colorado



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Cc: Please upload attached doc to Rem #7391, and upload email to Rem numbers 7391, 7291, and 7393 as "Additional COAs"

On Tue, Oct 22, 2013 at 11:31 AM, James Hix <jhix@olssonassociates.com> wrote:

John and Rick,

Attached is the Whiting Kern Produced Water Pit Closure Report for COGCC Pit #117951. Please let me know if you need hard copies of this report.

James

James W. Hix, PG | [Olsson Associates](#)

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