

From: D. Craig Heydenberk [<mailto:esi.craig@sopris.net>]
Sent: Saturday, June 08, 2013 9:23 AM
To: 'kconway@blm.gov'
Cc: 'Naomi'; 'Jim Graves'
Subject: FW: [Fwd: Re: INC response Laboratory Results 25-3]] response from Analytica and ESI

Kacey – Our responses from Analytica and ESI are provided below. ESI response is in BLUE.
As indicated in my voicemail please call me to discuss once you have had an opportunity to review the responses provided below. My initial thought is there is no reason to remediate these pits as there is no Petroleum Hydrocarbon Contamination reported in the laboratory analyses.

Thanks

Craig

D. Craig Heydenberk
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From: Carissa Seltrecht - Analytica [<mailto:cseltrecht@analyticagroup.com>]
Sent: Friday, June 07, 2013 11:40 AM
To: D. Craig Heydenberk
Subject: Re: [Fwd: Re: INC response Laboratory Results 25-3]]

Craig,
I have responded in purple, please let me know if you need anything further.

Carissa

----- Original Message -----

From: [D. Craig Heydenberk](mailto:esi.craig@sopris.net)
To: 'Carissa Seltrecht - Analytica'
Sent: Thursday, June 06, 2013 9:56 AM
Subject: FW: [Fwd: Re: INC response Laboratory Results 25-3]]

Carissa – This is regarding B1304160

Don't worry about the Arsenic Comments. Kacey the sample matrix was soil. [Arsenic](#) - Arsenic will always fail the States threshold of 0.39 mg/Kg. I have literally obtained hundreds of total metals samples and Arsenic is always greater the 0.39 mg/Kg. I have taken 20 total metals samples this year alone from Aspen to DeBeque and Arsenic has been reported at concentrations greater the 0.39 mg/Kg in every sample. Depending on who you discuss this with at the CDPHE the State recognizes that this threshold is too stringent and it is my understanding that they are making modifications. Laboratories have to analyze soil samples for Arsenic by an alternate method number (SW846) to attain a Method Detection Limit less than 0.39 mg/Kg. Furthermore – Please see the bottom of the table. We obtained three soil,

from undisturbed locations outside the pit. These Arsenic concentrations were reported at 1.4, 1.2 and 1.1 mg/Kg. Arsenic from the pit samples were reported at 0.9 and 0.8 mg/Kg. These reported concentrations are comparable. The reported laboratory data indicates that background Arsenic concentrations at the Site are greater than 0.39 mg/Kg – as it is across the State. Please check with your peers at the BLM – I would value their opinion.

Can you look into the SAR and Boron levels. The Separator Pit SAR makes sense because there is much Na and little Ca/Mg (The SAR of a soil is defined as the milliequivalent weight of Sodium divided by the square root of the milliequivalent weight of Calcium + the milliequivalent weight of Magnesium divided by 2).

Also provide an explanation of “RL-Increased due to sample matrix” Energy flags this weird but essentially the sample has just been diluted for that target. The dilution was probably needed because the result was over the calibration. The dilution is a function of the target level and not the matrix. There are only "D" flags on targets that are detects, and not on the entire sample, which would indicate actual matrix issues.

Analytica does not flag for this as Energy does but instead includes any dilution factor in the report (if we report a ND on a raised RL/diluted sample, then we might narrate).

Maybe John can provide explanation of Boron and SAR – I know these soils are very high in salts.

Feel free to provide comment in the body of the email.

Craig

From: Naomi [<mailto:naomi@maralexinc.com>]
Sent: Wednesday, June 05, 2013 3:48 PM
To: D. Craig Heydenberk
Subject: [Fwd: Re: INC response Laboratory Results 25-3]]

Hi Craig,

I'm assuming that you are handling this. Would you please respond to Kasey Conway. Please let me know if there is anything I can do to help.

Naomi

----- Original Message -----

From: Conway, Kacey <kconway@blm.gov>
Subject: Re: INC response Laboratory Results 25-3]
Date: Wed, 5 Jun 2013 15:38:47 -0600
To: Naomi <naomi@maralexinc.com>
CC: Catherine Ventling <cventling@blm.gov>, Edward Fancher <efancher@blm.gov>, Robert Hartman <bhartman@blm.gov>, Julia E Christiansen <jchristi@blm.gov>

Hi, Naomi -

Thanks for sending the results of the pit sampling. Have looked over the results, and have run them by our hazmat guy. There are a few tests that do fall outside of the range of COGCC rules.

I assume that Maralex is working with COGCC on the pit closure, and that you have submitted these results to them.

The Arsenic levels on both pits are too high (.9 and .8 mg/KG respectively vs COGCC standard of .39 mg/KG). Also the SAR in the Separator pit is 107(? was this typo?) - way over the standard of <12.

Also we wondered about the Boron (13.6D mg/KG and 9.7D mg/KG respectively) readings which are way above above the standard for both pits (2mg/L or 2mg/KG). We were wondering what was meant by Note 3 (which is relevant to the readings for this chemical) "D - RL increased due to sample matrix." What does that mean? What was the sample matrix? I'm sure COGCC will have the same comments.

Other than those items, everything else looked good. I

If you could keep me in the loop as far as COGCC's ruling on the pit results, I would be most appreciative.

Thanks.

Kacey Conway
Bureau of Land Management
Environmental Surface Inspector
Grand Junction Field Office
2815 H Road
Grand Junction, CO 81506

On Mon, Jun 3, 2013 at 10:20 AM, Naomi <naomi@maralexinc.com> wrote:

Good morning Kacey.

Below is an email from our environmental guy regarding soil lab results for Maralex's Roan Creek Fed 25-3 site. I will be in touch again when I get the reformatted file.

Thanks for your patience.

Naomi

----- Original Message -----

From:D. Craig Heydenberk <esi.craig@sopris.net>
Subject:Laboratory Results 25-3
Date:Tue, 28 May 2013 16:43:14 -0600
To:'Naomi' <naomi@maralexinc.com>
CC:<mrinc20@qwestoffice.net>

Naomi – good afternoon

Attached is the table of our summarized laboratory results for Roan Creek Federal 25-3. This pad has two pits identified as calcium Chloride Pit and Separator Pit. I need to format the table so it will print on to one 8.5 x11-inch sheet of paper. The results indicate that there are no exceedances and the location's two pits are appropriate for closure and no further action. I will prepare a Form 27 and a cover letter in the near future.

I will update the table soon so you can respond to the COGCC contact. Feel free to forward this email to them for now.

If you have any questions feel free to call

Thanks

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