



Re: S.J. Warren Skim Pit Assessment Report (Remediation #8179, Form 27 Workplan #2147593, Complaint #200390928, NOAV 200390941)

1 message

Noto - DNR, John <john.noto@state.co.us>

Wed, May 28, 2014 at 9:24 AM

To: James Hix <jhix@olssonassociates.com>

Cc: "Teff, John" <johnt@cmproductionllc.com>, "John.Axelson@state.co.us" <john.axelson@state.co.us>, "Jeremy.Ferrin@state.co.us" <Jeremy.Ferrin@state.co.us>, "Kirk.mueller@dgslaw.com"

<Kirk.mueller@dgslaw.com>, "Roger Freeman (roger.freeman@dgslaw.com) (roger.freeman@dgslaw.com)"

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SJ Warren #1 Skim Pit Remediation, Remediation #8179

James,

The Skim Pit Assessment Report has been filed under Remediation #8179. As stated in the Assessment Report; following the removal of all visibly stained oily soil, a *minimum* of five confirmation soil samples will be collected -one from the pit bottom and one from each sidewall. Submit the samples to a laboratory for TPH (Diesel Range Organics and Gasoline Range Organics), PAH, BTEX, SAR, EC, and pH analysis to verify compliance with Table 910-1. Provide an analytical summary sheet/table comparing confirmation sample results to Table 910-1 Standards. Provide photographs of the excavation. Provide a drawing that shows the an outline of the excavation with dimensions and depth. Provide the full laboratory analytical report. Provide disposal documentation.

Based on background concentrations and concentrations of metals in the impacted area, COGCC will not require metals analysis during the remediation. SAR, EC, and pH concentrations in soil that exceeds the Table 910-1 standards may be left in place with COGCC approval and if it is buried under at least three feet of clean fill.

If CM Production plans land treatment of the oily waste, please provide the following items to the Colorado Oil and Gas Conservation Commission (COGCC) for approval prior to land treatment of the oily waste:

1. A copy of the surface owner agreement for the land application,
2. A map/aerial photograph of the proposed spread field property,
3. A Waste Management Plan with land application procedures, waste tracking, sampling and planned schedule,
4. An evaluation of surface drainage and site-specific stormwater control Best Management Practices, and
5. An evaluation of shallow groundwater based on existing data and identification of nearby wells and uses.
6. Although not required, pre-application "background" soils analysis may be useful for "site specific" comparison of the fluids and cuttings to background conditions as well as Table 910-1 values.

Analysis for DRO and GRO may be used to assess the progress of the land treatment.

Feel free to call or email if you have questions or concerns.

Thank you,

John Noto

Cc: Remediation # 8179

On Tue, May 27, 2014 at 12:44 PM, James Hix <jhix@olssonassociates.com> wrote:

John,

Attached is the final assessment report for the subsurface investigation of the skim pit at the S.J. Warren #1 tank battery (Remediation #8179) conducted on March 27, 2014. CM Production is evaluating the options for either disposing of the impacted soil offsite or land treating it on location. Due to the expected volume of material in the skim pit, CM Production may request to land treat the impacted soil onsite and will submit a supplemental Form 27 per rule 907e. CM Production will need the surface owner's approval to land treat the soils and will prepare a request to the surface owner.

You will be notified at least 24 hours prior to commencing the excavation activities, and confirmation soil sample results showing that the wastes have been removed and the nature and extent of the impacted soils within the proximity of the former skim pit has been defined. It is expected that metals concentrations that were shown to be related to site specific background conditions during the site assessment will not have to be analyzed during the remediation. Parameters such as EC, pH, and SAR will be analyzed to show that the Table 910-1 levels have been met.

CM Production requests that GRO and DRO be used to assess the progress of the land treatment of the E&P wastes, and once analytical results have been received that show total petroleum hydrocarbons are less than 500 mg/kg, the confirmation soil samples will be analyzed for Table 910-1 soil parameters such as BTEX and PAH to show that the treated soil meets the Table 910-1 concentration levels. Soil sampling will be performed in accordance with the 900 series rules and a sufficient number of soil samples will be collected and analyzed to show that the soil parameters meet Table 910-1 concentration levels.

James

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From: Noto - DNR, John [<mailto:john.noto@state.co.us>]

Sent: Monday, February 24, 2014 10:52 AM

To: James Hix; Teff, John; John Axelson - DNR

Subject: RE: S.J. Warren skim pit assessment and remediation workplan (NOAV 200390941, Complaint #200390928), (From February 10, 2014 email)

James and John,

As a follow-up to recent emails regarding approvals. This is a re-send of the approval email for the SJ Warren Form 27 that was originally sent on February 10, 2014. CM Productions has addressed Item #1, by submitting a signature on the Form 27. Thank you.

James,

COGCC has assigned REM# 8179 and Document # 2147593 to the SJ Warren skim pit assessment and remediation. Please refer to these numbers in future correspondence.

COGCC approves the Form 27 with the following conditions;

1. The Form 27 was submitted without a signature, please sign the attached form and return it to me via email.
2. Notify, COGCC NE EPS, John Noto, 24 hours prior to commencing excavation activities.
3. Soil sampling results must be submitted to COGCC for approval prior to backfilling the excavation.
4. Provide the following items to COGCC to document the remediation; an analytical summary sheet/table comparing soil confirmation sample results to Table 910-1 Standards, a sample location diagram with the final excavation dimensions, the full laboratory analytical report, volume of soil excavated for disposal or treatment, and waste transportation documentation per Rule 907 (if applicable).
5. Submit land treatment plans to COGCC (if applicable) to determine if a Form 27 is required per Rule 907.e.(2).

Please feel free to contact me with questions or concerns.

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John Noto, P.G.

Environmental Protection Specialist

Colorado Oil and Gas Conservation Commission

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