



STATE OF  
COLORADO

EnviroScan - DNR, OGCC <dnr\_ogcc.enviroscan@state.co.us>

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## Fwd: Chev O36B: COGCC FIELD INSPECTION REPORT [Doc#674701063] - revised land farming procedure

1 message

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**Lujan - DNR, Carlos** <carlos.lujan@state.co.us>  
To: OGCC EnviroScan - DNR <dnr\_ogcc.enviroscan@state.co.us>

Mon, Apr 20, 2015 at 10:35 AM

Mary,

Would you please upload the attached document and this email?

Link to:

Location ID #335658

API 045 11969

REM #8051

Please send me the document number(s), so that I can share it with the operator.

Have a great and safe week :)

Thanks,

Carlos

**Carlos Lujan, Ph.D.**  
**Environmental Protection Specialist**  
**Northwest Region**

P 970.625.2497 x7 | F [970.625.2497](tel:970.625.2497) | C [970.286.3292](tel:970.286.3292)

796 Megan Avenue, Suite 201, Rifle, CO 81650

[carlos.lujan@state.co.us](mailto:carlos.lujan@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

----- Forwarded message -----

From: **Lujan - DNR, Carlos** <[carlos.lujan@state.co.us](mailto:carlos.lujan@state.co.us)>

Date: Mon, Apr 20, 2015 at 10:29 AM

Subject: Re: Chev O36B: COGCC FIELD INSPECTION REPORT [Doc#674701063] - revised land farming procedure

To: "Ghani, Debbie" <[DGhani@linenergy.com](mailto:DGhani@linenergy.com)>

Cc: "Johnson, Derek" <[DSjohnson@linenergy.com](mailto:DSjohnson@linenergy.com)>, "Hogelin, Thomas" <[THogelin@linenergy.com](mailto:THogelin@linenergy.com)>, "Spencer - DNR, Stan" <[stan.spencer@state.co.us](mailto:stan.spencer@state.co.us)>, "Burns, Bryan" <[BBurns@linenergy.com](mailto:BBurns@linenergy.com)>

Debbie,

Thanks for sending the proposed land farming sampling procedure. COGCC considers that the updated procedure is sound and that analytical results will be representative of the stockpiled material. COGCC agrees that final confirmation sampling needs to be more detailed than sampling during ongoing soil

treatment (which may help reducing sampling cost during ongoing treatment).

I will upload the document and this email. I will let you know what is the document number so that Linn Energy can reference the Sampling Procedure in future opportunities.

Thanks again,  
Carlos

**Carlos Lujan, Ph.D.**  
**Environmental Protection Specialist**  
**Northwest Region**



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On Fri, Apr 17, 2015 at 2:14 PM, Ghani, Debbie <[DGhani@linnenergy.com](mailto:DGhani@linnenergy.com)> wrote:

Good afternoon Carlos: attached is our proposed land farming sampling procedure for your review.

I am hopeful that this revision meets your approval.



**Debbie Ghani**

*Regulatory Compliance Supervisor*

LINN Operating, Inc.

1999 Broadway, Suite 3700

Denver, CO 80202

T: [303.999.4016](tel:303.999.4016)

F: [303.999.4116](tel:303.999.4116)

C: [303.947.2726](tel:303.947.2726)

[www.linnenergy.com](http://www.linnenergy.com)

**From:** Lujan - DNR, Carlos [mailto:[carlos.lujan@state.co.us](mailto:carlos.lujan@state.co.us)]  
**Sent:** Thursday, April 09, 2015 4:43 PM  
**To:** Skinner, Katherine  
**Cc:** Ghani, Debbie; Johnson, Derek; Hogelin, Thomas; Spencer - DNR, Stan  
**Subject:** Re: FW: Chev O36B: COGCC FIELD INSPECTION REPORT [Doc#674701063] - Status update

Katherine,

I passed the e-form 04 doc #[400818802](#) "O36B 595 Interim Site Stabilization Plan 2015 Facility ID 335658".

I included the following comments:

*The sampling procedure described in the attached document is NOT statistically sound. COGCC will not approve backfilling the pit with results of one composite sample for such a large volume of E&P waste, unless supported by a sound statistical analysis. A larger number of composite samples collected at different depths ranging from 3 to 6 feet at least is suggested. The use of a backhoe is also recommended to sample big stockpiles.*

The results presented to date are indicative of HC impact but do not represent statistically the large amount of material stockpiled in that pad, on both sides of the well heads (see photo below). Only one composite sample (made of 8 sub-samples) was taken to characterize all the material stockpiled on the O36B pad.



COGCC understands that sampling large stockpiles may be costly and that a compromise must be reached

between cost and representability. Although COGCC does not expect that operators follow sampling procedures as described in the attached document from California, it does expect a more representative sampling procedure.

Please call or email me with questions and/or comments.

Thanks,

Carlos

**Carlos Lujan, Ph.D.**  
**Environmental Protection Specialist**  
**Northwest Region**

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796 Megan Avenue, Suite 201, Rifle, CO 81650  
[carlos.lujan@state.co.us](mailto:carlos.lujan@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

On Thu, Apr 9, 2015 at 11:30 AM, Skinner, Katherine <[KSkinner@linnenergy.com](mailto:KSkinner@linnenergy.com)> wrote:

Carlos: I just uploaded Doc #400822440, which is a Form 4 Sundry in reference to your email below and the comments on Doc #400818802.

**Katherine Skinner**

**Regulatory Compliance Specialist 1**

LINN Operating, Inc.

1999 Broadway, Suite 3700

Denver, CO 80202

Office: (303)-999-4037

Cell: (303)-519-6509

[kskinner@linnenergy.com](mailto:kskinner@linnenergy.com)



**From:** Lujan - DNR, Carlos [mailto:[carlos.lujan@state.co.us](mailto:carlos.lujan@state.co.us)]  
**Sent:** Tuesday, April 07, 2015 10:44 AM  
**To:** Skinner, Katherine  
**Cc:** Ghani, Debbie; Johnson, Derek; Hogelin, Thomas  
**Subject:** Re: FW: Chev O36B: COGCC FIELD INSPECTION REPORT [Doc#674701063] - Status update

Katherine,

Thanks for sending the information and lab reports for the O36B pad. I included the following comment on the Comments?COAs tab:

*Please submit via e-form 04 a detailed sampling protocol for the stockpiles on the O36 B pad. How many samples for a composite? How many cu feet or cubic yards per composite? At what depths At what location within the stockpile (center, perimeter, etc.)? A graph or figure will be greatly appreciated.*

Consistency and representativity are keys to compare meaningfully the results from year to year.

Thanks,

Carlos

**Carlos Lujan, Ph.D.**  
**Environmental Protection Specialist**  
**Northwest Region**

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[carlos.lujan@state.co.us](mailto:carlos.lujan@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

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**Landfarming sampling procedure.pdf**

73K

