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DEPARTMENT OF NATURAL RESOURCES
Bill Ritter, Governor
1120 Lincoln St. Suite 801
Denver, CO 80203
Phone: (303) 894-2100
FAX: (303) 894-2109
www.cogcc.state.co.us

August 31, 2007

CERTIFIED MAIL RETURN RECEIPT REQUESTED
7007 0710 0005 4318 9219

Mr. Kent Stevens
Production Superintendent
Star Acquisitions VIII, LLC
P O Box 118
Marvel, CO 81329

Re: Notice of Alleged Violation #200118230
Turner #2 and Compressor site (#05-067-60012)
SENE 27, T33N, R12W
La Plata County, Colorado

Dear Mr. Stevens:

The Colorado Oil and Gas Conservation Commission (COGCC) is issuing this Notice of Alleged Violation (NOAV) to Star Acquisitions VIII, LLC (Star) in response a surface owner complaint (#200112795) and conditions observed at the Turner #2 well head and Compressor site.

The Colorado Oil and Gas Conservation Commission (COGCC) performed an environmental site inspection on June 22, 2007 as a result of a surface owner complaint regarding environmental issues at the Turner #2/Compressor location (#05-067-60012). During the inspection (#2001147283) it was observed that two pits are present at the site. A production pit (#263065) associated with the Turner #2 gas well and a blowdown pit associated with the condensate tank at the compressor station. Neither pit was observed to be lined even though the site is located in a sensitive area and no permit (Form 15) or permit application was located for the blowdown pit. The site inspection is located in Attachment 1.

The surface owner also expressed concern regarding the construction of a berm with hydrocarbon impacted soils along the upgradient side of the compressor pad to divert stormwater around the pad (see site Photographs in Attachment 2). The soils were to be landfarmed in response to a 2002 NOAV (#1229040) but were instead used for berm construction. You signed off on this NOAV on October 7, 2002 which is a statement that the abatement action had been addressed in accordance with COGCC Rules. However, oil staining was still evident along the berm. A 3-point composite soil sample was collected June 25, 2007 and delivered to Green Analytical for analysis. Results indicate total petroleum hydrocarbons at a concentration of 7,460 mg/kg (160 mg/kg DRO and 7,300 mg/kg MRO - Attachment 3); above

the COGCC sensitive area allowable concentration of 1,000 mg/kg. In addition, spent materials and miscellaneous unused equipment, trash and debris were spread around the site. And although your records indicate the weeds at this location were sprayed on June 1, 2007, they will require ongoing mitigation and maintenance to ensure long-term mortality. Photographs comparing this site from 2002 to 2007 show the increase in weed density (Attachment 2).

The rules cited in the NOAV are provided below along with required Abatement/Corrective Actions; the NOAV is included as Attachment 4.

COGCC RULES CITED

324A. POLLUTION

a. The operator shall take precautions to prevent significant adverse environmental impacts to air, water, soil, or biological resources to the extent necessary to protect public health, safety and welfare, by using cost-effective and technically feasible measures to protect environmental quality and to prevent the unauthorized discharge or disposal of oil, gas, E&P waste, chemical substances, trash, discarded equipment or other oil field waste.

603. DRILLING AND WELL SERVICING OPERATIONS

j. Statewide equipment, weeds, waste, and trash requirements. All locations, including wells and surface production facilities, shall be kept free of the following: equipment, vehicles, and supplies not necessary for use on that lease; weeds; rubbish, and other waste material.

902. PITS - GENERAL AND SPECIAL RULES

a. Pits used for exploration and production of oil and gas shall be constructed and operated to protect the waters of the state from significant adverse environmental impacts from E&P waste, except as permitted by applicable laws and regulations.

903. PIT PERMITTING/REPORTING REQUIREMENTS

a. Drilling pits, production pits, and special purpose pits shall be permitted or reported as follows:

(1) Pit Construction Report/Permit, Form 15, shall be submitted for prior Director approval for the following:

B. Unlined special purpose pits in sensitive areas.

904. PIT LINING REQUIREMENTS AND SPECIFICATIONS

a. Pit lining requirements. The following pits shall be lined:

(3) Special purpose pits, except emergency pits constructed during initial response to spills/releases, or flare pits where there is no risk of condensate accumulation.

b. The following specifications shall apply to pits that are required to be lined:

(1) Materials used in lining pits shall be impervious, weather resistant and resistant to deterioration when in contact with hydrocarbons, aqueous acids, alkali, fungi or other substances in the produced water.

(2) Soil liners shall have a minimum thickness of six (6) inches after compaction, shall cover the entire bottom and interior sides of the pit, and shall be constructed so that the hydraulic conductivity of the liner shall not exceed 1.0×10^{-6} cm/sec. Bentonite liners shall be constructed to provide equivalent protection. Operators shall perform post-construction tests either in a laboratory or in the field. All test results shall be filed with the Director.

907. MANAGEMENT OF E&P WASTE

a. General requirements

- (1) Operator obligations. Operators shall ensure that E&P waste is properly stored, handled, transported, treated, recycled or disposed to prevent threatened or actual significant adverse environmental impacts to air, water, soil or biological resources.
- (2) E&P waste management activities shall be conducted, and facilities constructed and operated, to protect the waters of the state from significant adverse environmental impacts from E&P waste, except as permitted by applicable laws and regulations.

e. Oily waste. Oily waste includes those materials containing crude oil, condensate or other hydrocarbon containing E&P waste, such as soil, frac sand, drilling fluids, workover fluids, pit sludge, tank bottoms, pipeline pigging wastes, and natural gas gathering, processing and storage wastes.

(1) Oily waste may be treated or disposed as follows:

B. Land treatment onsite or with prior written surface owner approval, offsite land treatment; or

(2) Land treatment requirements:

B. Oily waste shall be spread evenly to prevent pooling, ponding or runoff.

C. Contamination of ground water or surface water shall be prevented.

E. Land-treated oily waste incorporated in place shall not exceed the allowable concentrations in Table 910-1 (*1,000 mg/kg TPH for sensitive area soils*).

910. ALLOWABLE CONCENTRATIONS AND SAMPLING FOR SOIL AND GROUND WATER

a. **Soil and ground water allowable concentrations.** The allowable concentrations for soil and ground water are in Table 910-1 (*1,000 mg/kg TPH for sensitive area soils*).

911. PIT, BURIED OR PARTIALLY BURIED PRODUCED WATER VESSEL, BLOW DOWN PIT AND BASIC SEDIMENT/TANK BOTTOM PIT MANAGEMENT REQUIREMENTS PRIOR TO DECEMBER 30, 1997

d. The following permitting/reporting requirements applied to pits constructed prior to December 30, 1997:

(2) An Application Permit For Unlined Pit, Form 15 was required for the following:

A. Unlined production pits and special purpose pits in sensitive areas constructed prior to July 1, 1995, and not closed by December 30, 1997.

(3) An Application For Permit For Unlined Pit, Form 15 and a variance under Rule 904.e.(1). (repealed, now Rule 502.b.) was required for unlined production pits and unlined special purpose pits in sensitive areas constructed after July 1, 1995.

1003. INTERIM RECLAMATION

f. Weed control. During drilling, production, and reclamation operations, all disturbed areas shall be kept reasonably free of noxious weeds and undesirable species as practicable.

CORRECTIVE ACTIONS

1. The operator shall immediately cease use of the blowdown pit and initiate proper closure in accordance with Rule 905.
2. Provide Form 27 Site Investigation and Remediation Plan that includes a detailed sampling and analysis plan for review and approval. Ensure that soil and groundwater meet allowable concentrations as provided in Table 910-1. Provide confirmation laboratory data to COGCC for review and approval.
3. If a new pit is required, the operator shall submit a Form 15 in accordance with Rules 903. This is a sensitive area, any new pit shall be lined in accordance with Rule 901.f, 904.a.(2)(3), and 904.b. The operator is encouraged to seek fully enclosed tanks for future use.
4. The operator shall remove hydrocarbon impacted soils (a.k.a. the stormwater berm) from the site and dispose of in accordance with county, state and federal regulations. The operator shall take confirmation soil samples to demonstrate remaining soils exhibit less than 1,000 mg/kg total petroleum hydrocarbons. Copies of analytical data and waste disposal manifest(s) shall be sent to the COGCC prior to this NOAV being closed.
5. The operator shall remove unused materials and waste and appropriately dispose of them in accordance with Rule 603.j, county, state and federal requirements.
6. The operator shall put a plan together to either upgrade the Turner #2 pit by lining it or replace it with enclosed vessels and submit to the COGCC within 45 days. The pit shall either be lined or replaced with closed vessels within 6 months.

NOAV #200118230
Star Acquisition VIII, LLC
8/31/07
Page 5

DATE CORRECTIVE ACTION REQUIRED

Immediately: Cease use of blowdown pit and initiate closure actions in accordance with Rule 905.

By September 14, 2007: Submit Form 27 Site Investigation and Remediation Workplan for the blowdown pit and hydrocarbon impacted berm.

By October 31, 2007: 1) Define and cleanup impacted areas to meet the standards provided in Table 910-1 and provide analytical data and waste disposal manifests verifying cleanup and disposal to COGCC. Form 27 requirements are provided in Attachment 5. 2) Develop plan for upgrading or replacement of the Turner #2 pit and submit to COGCC.

By March 1, 2008: Upgrade or replace Turner #2 pit.

COGCC staff looks forward to working with Star Acquisition VIII, LLC to resolve these issues. If you have any questions or want to discuss this matter in more detail please contact me (970) 259-1619 or karen.spray@state.co.us.

Sincerely,
Colorado Oil and Gas Conservation Commission Staff



Karen L. Spray, P.G.
Environmental Protection Specialist
P.O. Box 2651
Durango, CO 81302-2651

Attachment 1: Site Inspection #200117283
Attachment 2: Photographs
Attachment 3: Berm Soil Analytical Data
Attachment 4: Notice of Alleged Violation #200118230
Attachment 5: Form 27 Requirements

cc: Brian Macke, COGCC Director w/o attachments
Carol Harmon, COGCC Enforcement Officer w/ attachments
Debbie Baldwin, COGCC Environmental Manager w/o attachments
Margaret Ash, COGCC Environmental Supervisor w/o attachments

ATTACHMENT 1
SITE INSPECTION #200117283

FORM
FIELD
Rev. 6/00

State of Colorado
Oil and Gas Conservation Commission
FIELD INSPECTION FORM
Note: Fields in red are required fields



Receive Date: 8/21/2007		Document number: 200117283	
Notice of Unsatisfactory Inspection		Notice of Satisfactory Inspection	
Inspector: SPRAY, KAREN - 3002030			
Inspection Date: 6/22/2007		Operator: STAR ACQUISITION VIII LLC	
Location: SENE 27 33N 12W N		Lease Name: TURNER 2	
API Number: 05 067 60012		Facility ID: 216813	
Inspection type: CO - INSPECTION OF PUBLIC COMPLAINT		Inspection status: PR - PRODUCING	
Reclam:	P&A Pass/Fail:	Violation: YES	NOAV: YES
UIC Viol type:	Tbg/Pkr Lk:	Csg Lk:	
Well ID Signs	Comments	Fences	Comments
Production Pits - EARTHEN PITS ONLY Sensitive Area YES			
Produced Water Pits - Total # 1 Oil Accumulation NO			
Comments: UNLINED;			
Skimming/Settling Pits - Total # Covered # Uncovered #			
Comments:			
Special Purpose Pits - Total # 1 Lined # Unlined # 1			
Comments: BLOWDOWN PIT AT CONDENSATE TANK, UNLINED, NO PIT PERMIT			
Tank Battery Equipment			
Buried/Partially Buried Vessels # Steel # Fiberglass # Concrete # Other			
Firewalls/Berms/Dikes			
MISC DEBRIS SCATTERED ABOUT. WEEDS.			
General Housekeeping			
Spills and Releases OIL STAINED SOILS AT COMPRESSOR STATION. SURFACE OWNER ALLEGES HC IMPACTED SOILS USED TO BUILD STORMWATER BERM. COLLECTED 3 PART COMPOSITE SOIL SAMPLE FOR ANALYSES.			
UIC Routine Inspection			
Inj. Pressure (psig)	T-C-Ann. Pressure (psig)	Brhd. Pressure (psig)	
Drilling Well/Workover			
Surface Rehabilitation			
Miscellaneous SURFACE OWNER CONCERNED ABOUT POTENTIAL PIT SEEPAGE IMPACTING A JUNIPER TREE IN A FIELD DOWNGRADIENT. COLLECTED BRANCHES IN 8/07 AND SUBMITTED TO CSU PLANT DIAGNOSTICS CLINIC FOR EVALUATION. CSU LAB DETERMINED TREE IMPACTED BY CHEMICAL			
CORRECTIVE ACTION REQUIRED: TPH IN BERMS = 7480 MG/KG IN THE DROMRO RANGES. SENSITIVE AREA STANDARD IS 1000 MG/KG. REMOVE SOILS AND APPROPRIATELY DISPOSE OF. SEE NOAV # 200118230 FOR DETAILS			
Date Corrective Action Required by: 10/31/2007		Date Remedied:	

Assign To: SPRAY, KAREN - 3002030 Assigned By: SPRAY, KAREN - 3002030 Status: IN PROCESS
OGCC Comments:

**ATTACHMENT 2
PHOTOGRAPHS**



Star compressor condensate tank blowdown pit – June 22, 2007
Note weeds and general lack of maintenance



Star compressor stormwater berm – June 22, 2007
Note: hydrocarbon impacted soils



TURNER #2 (#05-067-60012)
JULY 2002 and MAY 2007
Condensate Tank Pit



TURNER #2 (#05-067-60012)
JULY 2002 (above)
MAY 2007 (below)

ATTACHMENT 3
BERM SOIL ANALYTICAL DATA



GAL ID No.: 706-127-01

July 20, 2007

COGCC
PO Box 2651
Durango, CO 81302
Attention: Karen Spray

Project Name: Herrera PM
Project Number:
Date Received: 06/25/07

This is to transmit the attached analytical report. The analytical data and information contained therein was generated using specified or selected methods contained in references, such as Standard Methods for the Examination of Water and Wastewater, 18th & 19th editions, and Methods for Determination of Organic Compounds in Drinking Water, EPA-600/4-79-020.

Samples were received by Green Analytical Laboratories, Inc. in good condition on 06/25/07.

If you should have any questions or comments regarding this report, please do not hesitate to call.

Sincerely,

A handwritten signature in cursive script that reads 'Dublin Zuffelt'.

For: John Green
Laboratory Director

Enclosure

Green Analytical Laboratories, Inc.
 75 Suttle Street
 Durango, CO 81303

COGCC
 PO Box 2651
 Durango, CO 81302
 Attention: Karen Spray

PROJECT NAME:

PROJECT NUMBER:

SAMPLE I.D.: Herrera PM

GAL I.D.: 706-127-01

Date Received: 06/25/07

Date Reported: 07/20/07

QC Batches:

Sample Date: 06/22/07

Sample Matrix: Soil 1:1 Ext.

Laboratory Report

RESULTS

PARAMETER	METHOD	REPORT		DIL	UNITS
		LIMIT	RESULT		
Alkalinity as CaCO ₃	2320B	10	98	1	mg/L
Bicarbonate as CaCO ₃	2320B	10	96	1	mg/L
Carbonate as CaCO ₃	2320B	10	<10	1	mg/L
Hydroxide as CaCO ₃	2320B	10	<10	1	mg/L
Calcium, dissolved	200.7	0.5	33.3	1	mg/L
Chloride	4500Cl	10	13	1	mg/L
Conductivity	2510B	1.0	271	1	uS/cm
Iron, dissolved	200.7	0.05	0.37	1	mg/L
Magnesium, dissolved	200.7	0.5	6.7	1	mg/L
pH	150.1	NA	8.48	NA	SU
Potassium, dissolved	200.7	0.5	11.7	1	mg/L
Sodium, dissolved	200.7	0.5	13.4	1	mg/L
Sulfate	4500SO ₄	10	18	1	mg/L
SAR	Calc.		0.55		


 John Green, Laboratory Manager

Green Analytical Laboratories, Inc.
75 Suttle Street
Durango, CO 81303

COGCC
PO Box 2651
Durango, CO 81302
Attention: Karen Spray

GAL I.D.: 706-127-01
Date Received: 06/25/07
Date Reported: 07/20/07
QC Batches:

PROJECT NAME:
PROJECT NUMBER:
SAMPLE I.D.: Herrera PM

Sample Date: 06/22/07
Sample Matrix: Soil

TPH

RESULTS

PARAMETER	METHOD	REPORT		DIL	UNITS
		LIMIT	RESULT		
BTEX	8021		Attached	1	mg/L
TPHGRO	8015		Attached	1	mg/L
TPHDRO	8015		Attached	1	mg/L
TPHORO	8015		Attached	1	mg/L

D. Zinfest
for: John Green, Laboratory Manager

Green Analytical
75 Suttle Street
Durango CO, 81303

Project: COGCC
Project Number: [none]
Project Manager: Debbie Zufelt

Reported:
07/05/07 14:04

Herrera PM
T700840-01 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

Purgeable Petroleum Hydrocarbons by EPA 8015m

C6-C12 (GRO)	ND	500	ug/kg	1	7062906	06/29/07	06/30/07	EPA 8015m	
<i>Surrogate: 4-Bromofluorobenzene</i>		95.9 %	65-135		"	"	"	"	

Extractable Petroleum Hydrocarbons by 8015m

C13-C28 (DRO)	160	10	mg/kg	1	7062908	06/29/07	06/30/07	EPA 8015m	
C29-C40 (MORO)	7300	10	"	"	"	"	"	"	
<i>Surrogate: p-Terphenyl</i>		86.9 %	65-135		"	"	"	"	

Volatile Organic Compounds by EPA Method 8021B

Benzene	ND	5.0	ug/kg	1	7062907	06/29/07	06/30/07	EPA 8021B	
Toluene	ND	5.0	"	"	"	"	"	"	
Ethylbenzenc	ND	5.0	"	"	"	"	"	"	
m,p-Xylene	ND	10	"	"	"	"	"	"	
o-Xylene	ND	5.0	"	"	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		94.0 %	65-135		"	"	"	"	

SunStar Laboratories, Inc.

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



John Shepler, Laboratory Director

ATTACHMENT 4
NOTICE OF ALLEGED VIOLATION
#200118230



FOR OGCC USE ONLY 08/31/2007 200118230

*** NOTICE OF ALLEGED VIOLATION ***

OGCC Operator Number 10192 0 Name of Operator: STAR ACQUISITION VIII LLC Address: P.O. BOX 118 City: MARVEL State: CO Zip: 81329 Company Representative: KENT STEVENS

Date Notice Issued: 08/31/2007

Well Name: TURNER Well Number: 2 Facility Number: 216613 Location (QtrQtr, Sec, Twp, Rng, Meridian): SENE 27 33N 12W N County: LA PLATA API Number 05 067 60012 00 Lease Number: 25650

COGCC Representative: SPRAY KAREN Phone Number: 970 259-1619

THE FOLLOWING ALLEGED VIOLATION WAS FOUND BY THE COGCC REPRESENTATIVE FOR THE SITE LISTED Date of Alleged Violation: 06/22/2007 Approximate Time of Violation: 10:00AM Description of Alleged Violation: A production pit (#263065) is associated with the Turner #2 gas well and a blowdown pit is associated with the condensate tank at the compressor station. Neither pit was observed to be lined even though the site is located in a sensitive area and no permit (Form 15) or permit application was located for the blowdown pit. Also, soils used for the construction of a stormwater berm contain hydrocarbon impacted soils. The soils were to be landfarmed in response to a 2002 NOAV (#1229040) but were instead used for berm construction. Oil staining was still evident along the berm. Results of a 3-point composite soil sample indicate total petroleum hydrocarbons at a concentration of 7,460 mg/kg (160 mg/kg DRO and 7,300 mg/kg MRO); above the COGCC sensitive area allowable concentration of 1,000 mg/kg. In addition, spent materials and miscellaneous unused equipment, trash and debris were spread around the site.

Act, Order, Regulation, Permit Conditions Cited: 324A; 603.j; 902(a); 903(a)(1)(B); 904 (a)(3), (b)(1), (b)(2); 907 (a)(1 & 2); 907(e)(1)(B); 907(e)(2)(B,C,E); 910(a); 911(d)(2)(A); 911(d)(3); 1003.f

Abatement or Corrective Action Required to be Performed by Operator: 1. The operator shall immediately cease use of the blowdown pit and initiate proper closure in accordance with Rule 905. 2. Provide Form 27 Site Investigation and Remediation Plan that includes a detailed sampling and analysis plan for review and approval. Ensure that soil and groundwater meet allowable concentrations as provided in Table 910-1. Provide confirmation laboratory data to COGCC for review and approval. 3. If a new pit is required, the operator shall submit a Form 15 in accordance with Rules 903. This is a sensitive area, any new pit shall be lined in accordance with Rule 901.f, 904.a.(2)(3), and 904.b. The operator is encouraged to seek fully enclosed tanks for future use. 4. The operator shall remove hydrocarbon impacted soils (a.k.a. the stormwater berm) from the site and dispose of in accordance with county, state and federal regulations. The operator shall take confirmation soil samples to demonstrate remaining soils exhibit less than Abatement or Corrective Action to be Completed by (date): 10/31/2007 * Proper and timely abatement does not necessarily preclude the assessment of penalties and an Order Finding Violation.

TO BE COMPLETED BY OPERATOR - When alleged violation is corrected, sign this notice and return to above address: Company Representative Name: Title: Signature: Date: Company Comments:

*** THIS NOTICE CONSTITUTES A SEPARATE NOTICE OF ALLEGED VIOLATION FOR EACH VIOLATION LISTED ***

WARNING Abatement and reporting time frames for Notices of Alleged Violation begin upon receipt of the Notice or five days after the date it is mailed, whichever is earlier. Each violation must be abated within the prescribed time upon receipt of this Notice, reported to the Colorado Oil and Gas Conservation Commission at the address shown above, and postmarked no later than the next business day after the prescribed time for abatement. Should abatement or corrective action fail to occur, the Director may make application to the Commission for an Order Finding Violation. Proper and timely abatement does not necessarily preclude the assessment of penalties and an Order Finding Violation.

PENALTY PROPOSED BY THE DIRECTOR PER RULE 523 The Director may propose a penalty as listed in the table below, not to exceed a maximum of \$1,000.00 per day per violation. Such proposed penalty amount will be limited to \$10,000.00 per violation if the violation does not result in significant waste of oil and gas resources, damage to correlative rights, or a significant adverse impact on public health, safety, or welfare. Such proposed penalty amount may be increased if aggravating factors indicate the violation was intentional or reckless; had, or threatened to have, a significant negative impact on public health, safety, or welfare; resulted in significant waste of oil and gas resources; had a significant negative impact on correlative rights of other parties; resulted in, or threatened to result in, significant loss or damage to public or private property; involved recalcitrance or recidivism upon the part of the violator; involved intentional false reporting or record keeping; resulted in economic benefit to the violator. Such proposed penalty amount may be decreased if mitigating factors indicate the violator self-reported promptly, effectively and promptly responded to the violation; cooperated with the Commission or other agencies with respect to the violation; could not reasonably control, or be responsible for, the cause of the violation; made a good faith effort to comply with applicable requirements prior to the Commission learning of the violation; had any economic benefit reduced or eliminated due to the cost of correcting the violation; has demonstrated a history of compliance with Commission rules, regulations and orders. The Commission has final authority over the penalty amount assessed. The Commission or other agencies with respect to the violation; could not reasonably control, or be responsible for, the cause of the violation; made a good faith effort to comply with applicable requirements prior to the Commission learning of the violation; had any economic benefit reduced or eliminated due to the cost of correcting the violation; has demonstrated a history of compliance with Commission rules, regulations, and orders. The Commission has final authority over the penalty amount assessed. BASE FINE \$250.00 PER DAY PER VIOLATION: RULES 210, 307, 311, 312, 313, 314A, 315, 403, 405, 603, 604 BASE FINE \$500.00 PER DAY PER VIOLATION: RULES 205, 206, 207, 208, 302, 306, 308, 310, 316A, 321, 322, 326, 329, 330, 331, 332, 401 BASE FINE \$750.00 PER DAY PER VIOLATION: RULES 605, 608A, 608B, 607 BASE FINE \$1,000.00 PER DAY PER VIOLATION: RULES 209, 301, 303, 305, 308, 316B, 317, 317A, 318, 319, 320, 323, 324, 325, 326, 327, 333, 404, 602, 603, 604, 703, 704, 705, 706, 707, 708, 709, 711, 602, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 1002, 1003, 1004, 1101, 1102, 1103 In accordance with Rule 523.a.(4), fines for violations for which no base fine is listed shall be determined by the Commission at its discretion.

Signature of COGCC Representative: Date: Time: Resolution Approved by: Date:

State of Colorado
Oil and Gas Conservation Commission



1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109

FOR OGCC USE ONLY

OGCC Employee:

Spill Complaint
 Inspection NOAV

Tracking No: _____

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

Spill or Release Plug & Abandon Central Facility Closure Site/Facility Closure Other (describe): _____

OGCC Operator Number: _____	Contact Name and Telephone: _____
Name of Operator: _____	_____
Address: _____	No: _____
City: _____ State: _____ Zip: _____	Fax: _____

API Number: _____	County: _____
Facility Name: _____	Facility Number: _____
Well Name: _____	Well Number: _____
Location: (QtrQtr, Sec, Twp, Rng, Meridian): _____	Latitude: _____ Longitude: _____

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc.): _____

Site Conditions: Is location within a sensitive area (according to Rule 901e)? Y N If yes, attach evaluation.

Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): _____

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: _____

Potential receptors (water wells within 1/4 mi, surface waters, etc.): _____

Description of Impact (if previously provided, refer to that form or document):

Impacted Media (check):	Extent of Impact:	How Determined:
<input type="checkbox"/> Soils	_____	_____
<input type="checkbox"/> Vegetation	_____	_____
<input type="checkbox"/> Groundwater	_____	_____
<input type="checkbox"/> Surface Water	_____	_____

REMEDIALTION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):

Describe how source is to be removed:

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:

FORM
27
Rev 6/99

State of Colorado
Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801, Denver, Colorado 80203
(303)894-2100 Fax:(303)894-2109



Tracking Number: _____
Name of Operator: _____
OGCC Operator No: _____
Received Date: _____
Well Name & No: _____
Facility Name & No: _____

Page 2

REMEDIATION WORKPLAN (Cont.)

OGCC Employee: _____

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing. Use additional sheet for description if required.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required? Y N If yes, describe:

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: _____ Date Site Investigation Completed: _____ Date Remediation Plan Submitted: _____
Remediation Start Date: _____ Anticipated Completion Date: _____ Actual Completion Date: _____

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: _____ Signed: _____

Title: _____ Date: _____

OGCC Approved: _____ Title: _____ Date: _____

U.S. Postal Service TM **CERTIFIED MAIL** SM **RECEIPT**
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

MARVEL CO 81329

OFFICIAL USE

7007 0710 0005 4318 9219

Postage	\$	\$1.48
Certified Fee		\$2.65
Return Receipt Fee (Endorsement Required)		\$2.15
Restricted Delivery Fee (Endorsement Required)		\$0.00
Total Postage & Fees	\$	\$6.28



Sent to Star Acquisition VIII, LLC
 Street, Apt. No., or PO Box No. PO BOX 118
 City, State, ZIP+4 Marvel, CO 81329

PS Form 3800, August 2006

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Star Acquisition VIII, LLC
PO Box 118
Marvel, CO 81329

2. Article Number
 (Transfer from service label)

7007 0710 0005 4318 9219

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PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X Shauna Stevens Agent Addressee

B. Received by (Printed Name) Shauna Stevens C. Date of Delivery 9-5-07

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

COGCC Attn: K. Spray
PO BOX 2651
Durango, CO 81302-2651

