

STATE OF
COLORADO

EnviroScan - DNR, OGCC <dnr_ogcc.enviroscan@state.co.us>

Fwd: Cache Unit

1 message

Fischer - DNR, Alex <alex.fischer@state.co.us>
To: OGCC EnviroScan - DNR <dnr_ogcc.enviroscan@state.co.us>
Cc: Jim Hughes - DNR <jimo.hughes@state.co.us>

Thu, Jul 2, 2015 at 9:27 AM

Please upload the attached with the following information:

Unique identifier (REM/Spill/NOAV #, etc.): REM 7786, 7787, 7906, NOAV
200434664, API 083-05145, and Location ID: 313424
Document number (leave blank if one needs to be assigned):
Date received: July 2, 2015
Is data entry needed (Y/N): N
Notes: COGCC email Correspondence to MG July 2, 2015

Thanks!

-

Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



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

From: **Fischer - DNR, Alex** <alex.fischer@state.co.us>
Date: Thu, Jul 2, 2015 at 9:20 AM
Subject: Re: Cache Unit
To: Kerry Smith <ksmith@monumentglobal.com>
Cc: Sherry Ferrell <sferrell@monumentglobal.com>, David Bower <bower.dj@gmail.com>, Jim Hughes - DNR <jimo.hughes@state.co.us>, Tom Fox <tomfox@beyondbb.com>, Pamela Leschak <pleschak@blm.gov>

Kerry,

Thanks for the updates and moving forward. I do want to point out that Monument Global is working at risk without approved workplans. Mr. Bower states that he performed the work below:

Sampled and recorded all spill sites, only one spike on pid in the ast area, however that was 3.5 ppm. Installed sample tubes and stakes in ast area plus #12 #15 and #17. Sampled these area also. Carrying out field assay tomorrow to enable reclaim works plus seeding out spill areas where applicable.

The questions/comments I have include:

- What constituents are being sampled for? where along the spill path?
- The PID will probably not be an effected field screening tool, as most of the lighter end hydrocarbons may have volatilized.
- What are these *sample tubes and stakes*?
- What is meant by the field assay?

Mr. Bower's methodologies and path forward for each of these incidents need to be captured on separate a Form 27 Addendums, that will be reviewed and approved by the COGCC.

As a reminder, the May 7, 2015 "Warning Letter" specifically outlined guidance on how to comply which included Supplemental reporting and sampling. Additionally, a Form 19 Spill/Release is to be submitted for Spill #4. Please refer to the "Warning Letter."

One additional item is, it was reported on July 1, 2015, that allegedly, during the back fill of pit at the Cache Unit #12 (API 05-083-05145), fluids from the pit ran out into a man made diversion ditch toward a dry creek. It is alleged that Mr. Bower and Mr. Fox were on location when this occurred. The Pit Facility associated with this particular well location SHALL be closed in accordance to the COGCC Rules under an approved From 27 Site Investigation and Remediation Workplan.

The COGCC is requiring 72 hours notification prior to any work being performed on site relating to the locations and incidents outlined in the "Warning Letter."

Regards,
Alex

On Mon, Jun 29, 2015 at 6:56 PM, David Bower <bower.dj@gmail.com> wrote:

Brief of today's works!

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Thanks
Dave Bower

On Jun 24, 2015 5:48 PM, "Kerry Smith" <ksmith@monumentglobal.com> wrote:

Alex,

Per our conversation last week I'm in Australia regarding investment into the Cache Unit. Please see an update regarding what we have done regarding your Warning Letter. Please see correspondence below regarding Dave Bower's trip to the Cache Unit. And a follow up reclamation plan.

" Kerry,

I am putting together a report doc for the site visit and clean up requirement.

Meeting with Jim Hughes from COGCC on site on Monday 29th June at the central battery.

My suggestion is that during the site visit we will carry out a full assay on the site, drop in monitoring points and sample the areas. At the same time we will carry out scrub and seeding work (Tom has the seed already) therefore we would need to rent a tractor and harrow for a couple of days, use the backhoe and knock out the clean up and reclaim in a couple of days. he plan is to meet with COGCC and commence immediately with the spill work and reclamation providing COGCC are in agreement and I can get the plan written up prior to Monday 29th.

There is a lot of comms and reporting to go through prior to issuing the plan and it is my intent to issue this as early as possible next week to get everything in place prior to the 29th, I am aiming for Tuesday/Wednesday next week.”

“Hi Kerry,

From the site visit on Thursday 25th June At the Cache unit, I visited all 4 spill sites, the central battery and the 3 reclamation locations.

Spill site observations.

#1, no surface staining observed in the area of the spill or staining up to 1000ft downstream of the event location.

#2, Minor staining observed, no water or oils observed.

#3 minor staining observed in an area of less than or equal to 0.1 sq ft, and less than 1/4" into surface. remedial works were previously discontinued due to advisory from land owner. some surface ponding of water, no sheen or superlatent oils.

#4 marginal staining observed, penetration less than 0.25"

Recommended actions;

All sites removal of surface stained soils/rock in localized areas, monitoring with PID, collect soil sample for assay. following removal, scarify surface area and reseed with background indigenous species, monitor area periodically.”

Dave will be meeting With Jim on site on Monday the 29th.

Best Regards,

Monument

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Environmental Supervisor, Western Colorado



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