



STATE OF
COLORADO

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

Fwd: Variance for Extension of Multiwell Pit Sundry

1 message

Fischer - DNR, Alex <alex.fischer@state.co.us>

Mon, Jul 13, 2015 at 1:58 PM

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

Cc: Carlos Lujan - DNR <carlos.lujan@state.co.us>

Please upload this email to the following information:

Unique identifier (REM/Spill/NOAV #, etc.): Pit Facility 430352

Document number (leave blank if one needs to be assigned):

Date received: July 2, 2015

Is data entry needed (Y/N): N

Notes: July 2, 2015 email requesting withdrawing variance request for pit extension

Thanks!

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Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



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| alex.fischer@state.co.us www.colorado.gov/cogcc

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

From: **Scott Ghan** <sghan@vnrlc.com>

Date: Thu, Jul 2, 2015 at 10:28 AM

Subject: RE: Variance for Extension of Multiwell Pit Sundry

To: "Lujan - DNR, Carlos" <carlos.lujan@state.co.us>

Cc: Alex Fischer <alex.fischer@state.co.us>

Thanks Carlos and have safe 4th yourself. Please delete.

From: Lujan - DNR, Carlos [mailto:carlos.lujan@state.co.us]
Sent: Thursday, July 02, 2015 10:18 AM
To: Scott Ghan
Cc: Alex Fischer
Subject: Re: Variance for Extension of Multiwell Pit Sundry

Scott,

If Vanguard has decided to close the pit, I should probably delete the submitted e-form 04 requesting a variance. I will do that if you respond to this email approving it.

I hope you enjoy the 4th of July weekend,

Carlos

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



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On Thu, Jul 2, 2015 at 9:22 AM, Scott Ghan <sghan@vnrlc.com> wrote:

Carlos,

I appreciate your assistance to date with this Rule 902.e variance request, but I want to inform you that Vanguard Operating, LLC will no longer be pursuing this variance request. Since initiating this process in late February of this year, there have been numerous email exchanges, two Form 4 submittals, an onsite inspection, multiple requests for additional information and COAs. I feel the justifications that have been provided and the information within the existing Form 15 from the previous Operator fully support this variance request, but this process has become very labor intensive and possibly cost prohibitive to extend an existing, valid pit permit for only one additional year.

Vanguard will be submitting a Form 27 in the near future detailing the closure activities for the permitted pit. The pit will not be in service after the October 3rd, 2015 deadline in the existing permit. We plan to remove the liner/leak detection systems and sample the base of the pit before the end of the year, if the weather permits and we can avoid the hunting seasons at the request of the surface owner. The backfilling, surface grading and seeding will likely be completed in the second quarter of 2016 due to Winter weather conditions, BLM timing stipulations, frozen or saturated soils and the timing of seasonal moisture to promote successful reclamation of the disturbed area. These items will be included in the pending Form 27 in additional detail.

Thanks,

Scott Ghan

Senior EH&S Specialist

Vanguard Operating, LLC

112 Red Feather Trail Silt, Colorado 81652

Office 970.876.1959/Cell 970.744.8128/Fax 970.876.0981



From: Lujan - DNR, Carlos [mailto:carlos.lujan@state.co.us]

Sent: Tuesday, June 23, 2015 11:24 AM

To: Scott Ghan

Cc: Alex Fischer

Subject: Re: Variance for Extension of Multiwell Pit Sundry

Scott,

RE: Pit Facility #430352 MDP #6 Multi-Well Pit

E-form 04 variance request doc #400833809

Here are the conditions of approval that will be added to the e-form 04 (see below). I have attached an example of the historic Timeline that COGCC is asking Vanguard to provide. Considering that this pit has not been in use for the last two years, the timeline history should be pretty simple to write.

Meanwhile, I will write my summary report as requested by the COGCC.

Please let me know if you have questions or comments.

Thanks,

Carlos

Conditions of Approval:

- 1) Have a Professional Engineer (P.E.), registered in Colorado, inspect the pit and sign off on it, and conduct a hydrostatic test or liner integrity test before using the pit. This is important because the pit has been empty for two years.
- 2) No hoses shall be allowed to be in contact with the liner.
- 3) Provide a contingency plan should Vanguard find fluids in the leak detection, and provide frequency for monitoring the leak detection system.
- 4) Close the Pit Facility by October 3, 2016.
- 5) No extension shall be granted for use of the pit beyond October 3, 2016.

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



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