

On June 29, 2015 COGCC SW EPS Jim Hughes conducted a follow up environmental field inspection of the Monument Global Cache Unit remediation projects. These remediation projects are associated with flow line releases in the proximity of the Cache Unit #9 (API #05-083-05148) and the Cache Unit #6 (API #05-083-05152). COGCC Environmental staff met with David Bower of Bower Environmental and Sustainable Technologies, working as a consultant for Monument Global. Tom Fox, Monument Global representative, was on site to discuss remediation efforts. The purpose of this site visit and meeting was to discuss actions required by Warning Letter document #2533889, received by Monument Global on May 12, 2015. An additional copy of this document was given to Mr. Bower during this meeting. As of June 29, no activities had taken place regarding these releases since the last COGCC site visit on 3/18/2015 (Inspection document #674900427). A back hoe crew was on site to begin remediation work under Mr. Bower's direction. During this initial meeting, at the Central Delivery Point for the Cache Unit (near the Cache Unit #20) Tom Fox indicated the area where the excavated material from spill #3 was spread out on the ground. This area is located in the southwest corner of the facility. According to the COGIS maps, this area is on Ute Mountain Ute Tribal Lands. A summary of this site visit follows.

Cache Unit #9

On June 29, 2015 Tom Fox and David Bower accompanied COGCC Environmental staff to the historic location of an AST associated with the CU #9. The site of the now removed AST is approximately 250' north-northeast of the CU #9 well head. Due to its close proximity to the East Fork of McElmo Creek, the BLM had previously asked that the tank be removed, according to MG representative, Tom Fox. Pictures of the site show free product in the earthen secondary containment berm. The berm has since been knocked down. Impacted material is readily visible. The corrective actions noted in the warning letter were discussed in regards to this site. Initially, a Form 19 shall be submitted to report the historic release. This impacted area is currently known as spill #4. As of the date of this inspection, no required corrective actions have been performed.

The historic flow path from REM project #7786 (spill #1) was walked with Mr. Fox and Mr. Bower. No evidence of impacted material remains in the streambed or along the banks. Mr. Fox indicated the furthest downstream extent of the release. Details of the warning letter regarding spill #1 were discussed. As of the date of this inspection, no corrective actions have been performed. Confirmation sampling was discussed with the MG consultant. An abbreviated constituent list was requested for these confirmation samples. Previous sampling events and concentration levels above Table 910-1 standards will be evaluated to determine whether or not this request will be approved.

The impacted area where spill #3 occurred was also delineated with Mr. Fox and Mr. Bower. This area includes an open trench that terminates at a wattle, which allegedly marks the furthest extent of the release. This open trench was excavated to remove impacted material. This trench leads southwest from an excavated area near the release point. The excavated material from this area was temporarily stored on the CU #26 location, and then moved to the central delivery point near the CU #20, according to Mr. Fox. The MG consultant indicated that soil samples would be collected and analyzed from this area. Specifics from the warning letter regarding REM project #7906 were discussed, including the collection of confirmation samples. As of the date of this site visit, no required corrective actions had been performed.

Cache Unit #6

Mr. Fox, Mr. Bower, and COGCC Environmental staff walked the area impacted by spill #2 during the June 29, 2015 site visit. Impacted material is visible in the tributary drainage of the East Fork of McElmo Creek. A wattle anchored by "t" posts across this tributary drainage marks the furthest extent of the release, according to Mr. Fox. This release was the result of a corroded flow line with a release point on top of the mesa. Corrective actions required by the warning letter have not been performed to date.

On July 16, 2015 COGCC SW EPS Jim Hughes conducted a follow up environmental field inspection of the Monument Global Cache Unit remediation projects, accompanied by BLM representative Pam Leschak. During this site visit the areas involved in remediation project #'s 7786, 7787, and 7906 were investigated. The site of the AST associated with the Cache Unit #9 was also inspected.

Cache Unit #9

During this site inspection, COGCC and BLM staff were unable to find any indication of recent surface disturbance in the area of REM project #7786 (Spill #1), which was a flow line release that impacted the East Fork of McElmo Creek. No sample point location markers were discovered along the historic flow path.

On the 7/16 site visit, it was noted that the area of REM #7906 (Spill #3) had been backfilled and re-contoured. The trench and open hole near the buried flow line were to be sampled prior to back filling of the excavation. No sample results have been submitted to SW EPS. No sample point location markers were visible in the area.

During this joint inspection, the location of the historic AST associated with the Cache Unit #9 was also investigated (Spill #4). Four points were marked with lathe and orange ribbon, roughly marking a perimeter around the AST site. Five PVC tubes, approximately 6" in diameter had been buried in the area. The tubes were capped and sealed with duct tape. Each tube was roughly 1' above ground surface. According to Mr. Bower, these tubes mark the location where soil samples were taken. No sample results have been submitted to SW EPS. Please refer to inspection document #674900657 for the most recent field inspection report of this facility.

Cache Unit #6

The flow path of the historic release associated with the CU #6 was determined to have had no recent surface disturbance during this site visit. The drainage below the cliff band was followed to the alleged extent of the release. The release point was walked to the cliff edge, with no indication of sampling or remediation work since the last site inspection on 6/29/15.