



Mr. Stan Spencer
Colorado Oil and Gas Conservation Commission
Environmental Protection Specialist
Northwest Region
Rifle, CO 81650

RE: Black Sulfur Tank Battery
Notification of Completion
Form 19 DOC# 400880734

Dear Mr. Spencer,

XTO Energy (XTO) completed remediation of the produced water/condensate release on the Black Sulfur Tank Battery on 8/25/2015. Impacted soils were removed and Table 910-1 compliance samples were collected from each of the impacted areas, see attached Table 1 and Site Plan. Analytical results are below Table 910-1 concentrations with the exception of Arsenic HT #1 (9.1 mg/kg) and HT #2 (7.4 mg/kg).


Elevated Arsenic levels above Table 910-1 concentrations are within approved background Arsenic levels. Please refer to COGCC approved Form 4 DOC# 2223365 establishing the FRU 297-20A Background Arsenic concentration of 9.34 mg/kg. The attached Background Arsenic Figure illustrates the proximity of Black Sulfur Tank Battery and FRU 297-20A locations; background Arsenic levels are believed to be representative of the area.

Soil samples were collected following proper sampling and shipping protocol and submitted to Accutest Laboratories in Wheat Ridge, Colorado. QAQC of the laboratory results indicated no outstanding anomalies. The laboratory test results are summarized in the attached tables. Complete laboratory reports are available on request.

Impacted soils will be disposed of at Wray Gulch Landfill, Meeker, CO; the excavation will be backfilled with clean fill material. All materials hauled for offsite disposal will be properly manifested, disposal manifests available upon request.

XTO Energy is herein requesting closure of and Notice of Completion for Form 19 DOC# 400880734. If you should have any questions or comments please feel free to contact me at your earliest convenience (970) 675-4122.

Respectfully,


Jessica Dooling
Piceance EHS Supervisor

Enclosures: Table 1
Site Plan

Table 1
Location: Black Sulfur Tank Battery
Lab Summary

Last Update:

Analytical Parameter (with units)	BSTB Heater Treater Historic Release			FRU 297-20A Background Arsenic					FRU 297-20A Background Arsenic					COGCC
	HT Release #1 (-2')	HT Release #2 (-2')	HT Release #1 Confirmation (-3')	#1	#2	#3	#4	#5	#1	#2	#3	#4	#5	Table 910-1 Concentration Levels
Accutest Job #	D73919 (8/12/15)		D74404 (8/25/15)	D20762 (1/26/11)					D29648 (11/18/11)					-
Sample type (Composite/Discrete)	D	D	D	D	D	D	D	D	D	D	D	D	D	-
TPH (GRO) (mg/Kg)	307	12.7	ND	-	-	-	-	-	-	-	-	-	-	-
TPH (DRO) (mg/Kg)	433	26.1	14.8	-	-	-	-	-	-	-	-	-	-	-
TPH (GRO + DRO) (mg/Kg)	740	39	14.8	-	-	-	-	-	-	-	-	-	-	500
Benzene (mg/Kg)	ND	ND	-	-	-	-	-	-	-	-	-	-	-	0.170
Toluene (mg/Kg)	0.170	0.0095	-	-	-	-	-	-	-	-	-	-	-	85
Ethylbenzene (mg/Kg)	0.553	0.0033	-	-	-	-	-	-	-	-	-	-	-	100
Xylenes (total) (mg/Kg)	14.2	0.0275	-	-	-	-	-	-	-	-	-	-	-	175
Acenaphthene (mg/Kg)	ND	ND	-	-	-	-	-	-	-	-	-	-	-	1000
Anthracene (mg/Kg)	ND	ND	-	-	-	-	-	-	-	-	-	-	-	1000
Benzo(A)anthracene (mg/Kg)	ND	0.0032	-	-	-	-	-	-	-	-	-	-	-	0.22
Benzo(B)fluoranthene (mg/Kg)	ND	0.0054	-	-	-	-	-	-	-	-	-	-	-	0.22
Benzo(K)fluoranthene (mg/Kg)	ND	ND	-	-	-	-	-	-	-	-	-	-	-	2.2
Benzo(A)pyrene (mg/Kg)	ND	ND	-	-	-	-	-	-	-	-	-	-	-	0.022
Chrysene (mg/Kg)	ND	0.0042	-	-	-	-	-	-	-	-	-	-	-	22
Dibenzo(A,H)anthracene (mg/Kg)	ND	ND	-	-	-	-	-	-	-	-	-	-	-	0.022
Fluoranthene (mg/Kg)	ND	0.0039	-	-	-	-	-	-	-	-	-	-	-	1000
Fluorene (mg/Kg)	ND	ND	-	-	-	-	-	-	-	-	-	-	-	1000
Indeno(1,2,3,C,D)pyrene (mg/Kg)	ND	ND	-	-	-	-	-	-	-	-	-	-	-	0.22
Naphthalene (mg/Kg)	0.499	0.0073	-	-	-	-	-	-	-	-	-	-	-	23
Pyrene (mg/Kg)	0.0028	0.0037	-	-	-	-	-	-	-	-	-	-	-	1000
Electrical Conductivity (mmhos/cm)	2.160	1.940	-	-	-	-	-	-	-	-	-	-	-	4
Sodium Adsorption Ratio (SAR)	0.924	0.538	-	-	-	-	-	-	-	-	-	-	-	12
pH	8.66	8.96	-	-	-	-	-	-	-	-	-	-	-	6-9
Arsenic (mg/kg)	9.1	7.4	-	3.8	4.0	4.1	6.8	7.6	7.3	3.2	3.9	5.5	8.5	0.39
Barium (mg/kg)	213	217	-	-	-	-	-	-	-	-	-	-	-	15000
Cadmium (mg/kg)	<1.2	<1.1	-	-	-	-	-	-	-	-	-	-	-	70
Chromium (III) (mg/Kg)	28.3	28	-	-	-	-	-	-	-	-	-	-	-	120000
Chromium (VI) (mg/Kg)	<1.0	<1.0	-	-	-	-	-	-	-	-	-	-	-	23
Copper (mg/kg)	18.6	14.9	-	-	-	-	-	-	-	-	-	-	-	3100
Lead (inorganic) (mg/kg)	13.2	10.8	-	-	-	-	-	-	-	-	-	-	-	400
Mercury (mg/kg)	<0.10	<0.096	-	-	-	-	-	-	-	-	-	-	-	23
Nickel (mg/kg)	21.9	19.8	-	-	-	-	-	-	-	-	-	-	-	1600
Selenium (mg/kg)	7.1	6.1	-	-	-	-	-	-	-	-	-	-	-	390
Silver (mg/kg)	<7.3	<6.8	-	-	-	-	-	-	-	-	-	-	-	390
Zinc (mg/kg)	73.5	61.3	-	-	-	-	-	-	-	-	-	-	-	23000
% Solids	82.2	86.8	89.4	81.2	70.1	78.1	81.0	87.4	80.4	87.4	91.0	92.8	91.3	-

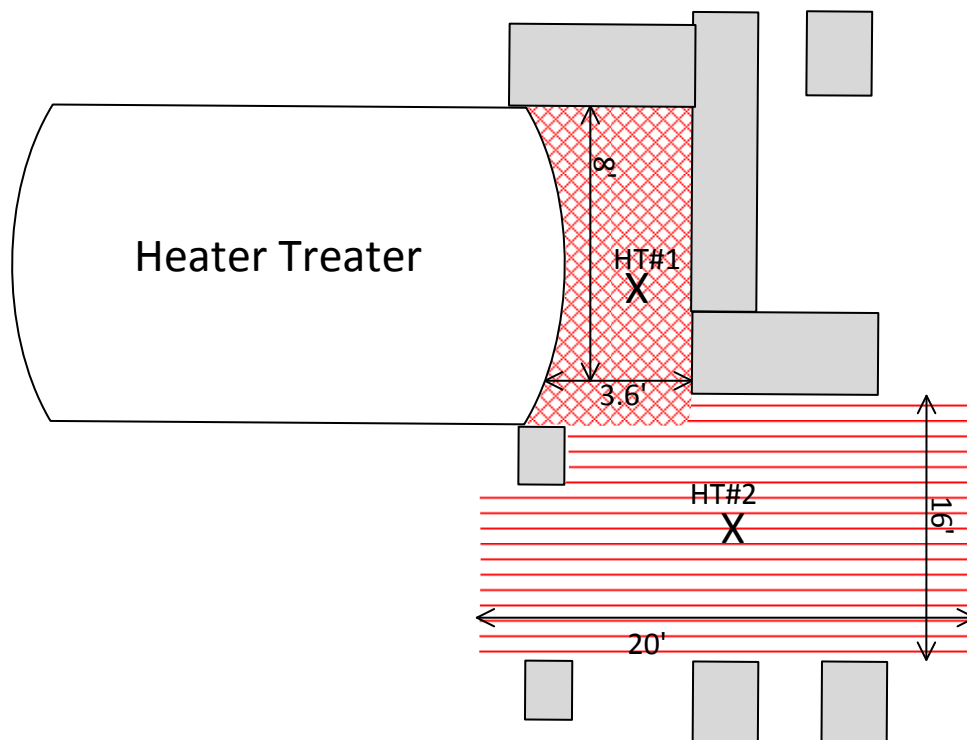
Notes:

1) ND = not detectable to the laboratory detection limit.






arsenic background= 9.4 mg/kg).

3) "-" indicates no analysis.

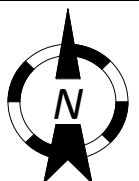
Black Sulfur Tank Battery



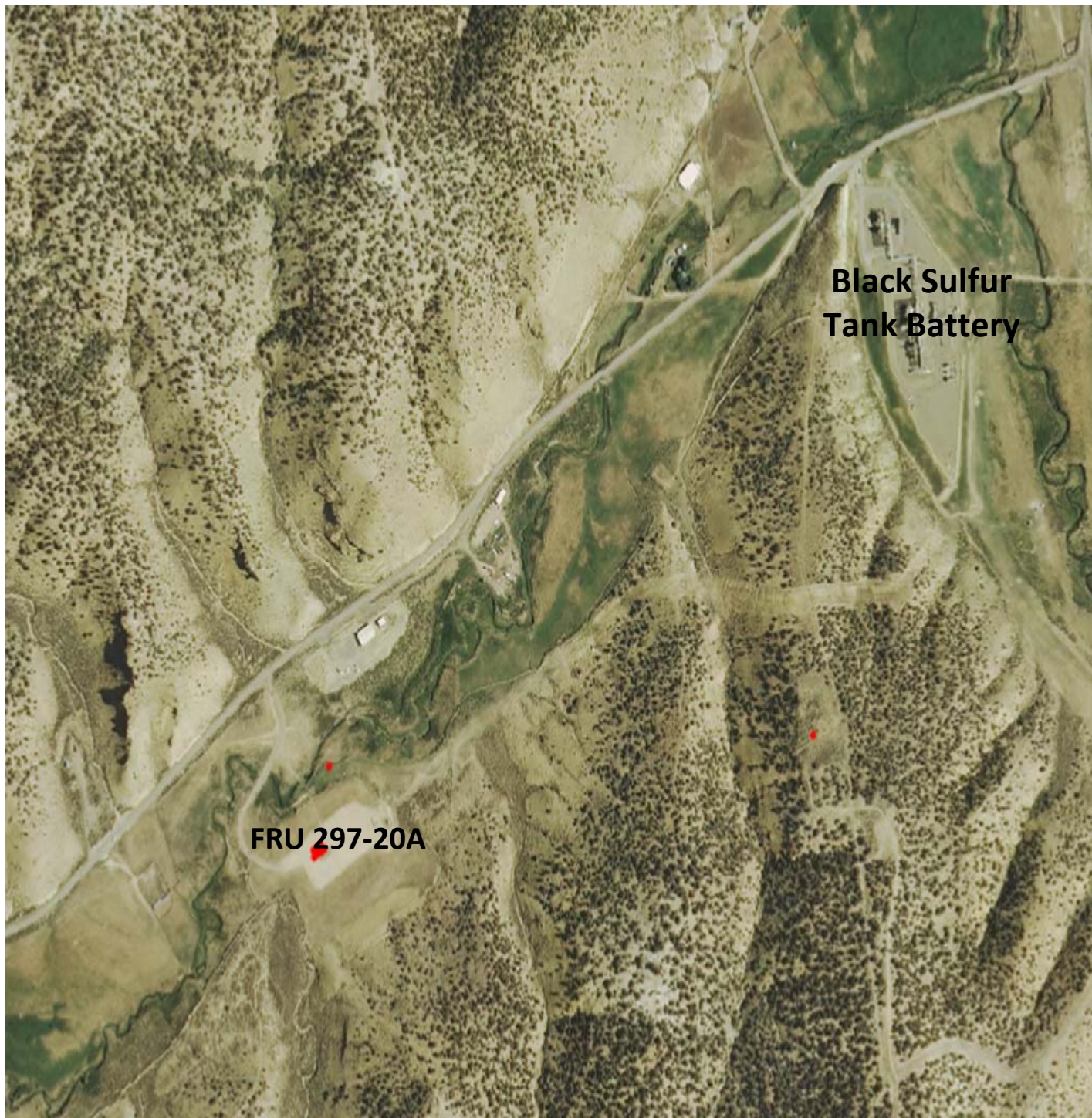
Spill Area ~349 square feet

-  Overhead Equipment Footers
-  Spill Area Excavation -2 feet
-  Spill Area Excavation -3 feet
-  Samples taken
-  Heater-Treater Truck Loadout

*Map Not to Scale



Black Sulfur Tank Battery Background Arsenic



Black Sulfur Tank Battery
NWNW, Sec 21, T2S, R97W, NAD 83, 6th PM
Lat. 39.869660 Long: -108.288373