



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

API: 081-06551
Location: 312988
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January 11, 2016

Attn: Mr. Scott Kerr
Wesco Operating, Inc. - Operator #95520
Gov't-Stroock-NCT-1 #4, API #081-06551
Location #312988
Government Stroock #4 Landfarm Annual Report - Submitted January 8, 2016

Dear Mr. Kerr

Wesco Operating, Inc. (Wesco) request to discontinue mechanically tiling the soil, sampling the landfarm, and their request for reclaiming the location is **NOT** approved. The land treatment of the oily waste shall continue until total petroleum hydrocarbons (TPH) meet Table 910-1 concentration. The following conditions apply:

1. Land Treatment of waste shall be performed in strict accordance with the requirements of COGCC Rule 907.e.(2).
2. Wesco shall continue to collect soil samples from the treatment area and shall collect samples **monthly** (May 1st through September 30th) to establish rate of biodegradation. Samples shall be collected consistently from the same approximate locations during each sampling event.
 - a. One sample shall be collected from each quarter of soil being treated.
 - b. Progress samples shall be analyzed for Total Petroleum Hydrocarbons (TPH) - gasoline range organics (GRO) and diesel range organics (DRO).
 - c. Final confirmation samples prior to reuse of the material shall be analyzed for TPH - GRO & DRO, Polycyclic Aromatic Hydrocarbons (PAH), Electrical Conductivity (EC), pH, Sodium Adsorption Ratio (SAR).
3. Submit progress reports no later than August 31, 2016 and October 30, 2016 of treatment. Include the following information in each progress report:
 - a. Dates and description of work performed such as aeration by tilling or addition of nutrients, microbes, water or other amendments.
 - b. Include types and volumes of nutrients, microbes or other amendments.
 - c. Provide sample results with sample location diagram, summary table of results compared to Table 910-1 standards and laboratory reports.



Wesco Operating, Inc.

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Conditions of Approval

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- d. Failure to submit the semi-annual progress reports by the due dates will result in the requirement to immediately dispose all oily waste off site at an appropriate disposal facility.
4. Implement stormwater controls to prevent contamination of stormwater runoff.
5. Control weeds in the disturbed areas associated with the land treatment.
6. Wesco shall complete remediation by October 31, 2016. In the event any treated waste fails to meet Table 910-1 standards by October 31, 2016, it must be removed and disposed of at a commercial facility within 30 days. Disposal documentation must be received by COGCC within 15 days following disposal.
7. If waste fails to meet Table 910-1 standards and is removed from the location for disposal, the underlying soil must be sampled to verify compliance with Table 910-1 standards.
8. The location must be reclaimed in accordance with Rule 1004.c. final reclamation threshold within three (3) months after treatment or disposal of oily waste is completed.
 - a. Final reclamation shall include incorporation of treated waste or other proposed reuse, final contouring, seeding and weed control until vegetation complies with the threshold for release.
9. To meet closure criteria for the remediation, submit a final report with a closure request and request for inspection once all confirmation samples comply with Table 910-1 standards. Final closure request shall be made no later than October 31, 2016.

Should you have any questions, please contact me at 303-894-2100 extension 5138 or Mr. Kris Neidel at 970-871-1963.

Sincerely,



Alex Fischer, P.G.

Environmental Supervisor-Western Colorado

Cc: Kris Neidel
Northwest Environmental Protection Specialist