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EMC Environmental Project Manager

REM# 9412
DOC# 2212507
DATE: 4/29/2016

April 19, 2016

Kris Neidel
Environmental Protection Specialist Northwest Area
Colorado Oil and Gas Conservation Commission
2578 Riverside Drive
Steamboat Springs, CO 80487

Subject: Pit Closure - Rangely Collection Station #28

Dear Mr. Neidel,

This letter is in regard to the Pit Closure activities at Collection Station #28 (CS28) in the Rangely Field. Per your conversations with Jim Litz (AECOM) on 2/25/16, it is understood that further information has been requested regarding the confirmation samples from the south wall area collected during the pit closure. To recap, the sample collection was performed as follows:

Sample ID CS28-SW was collected on July 17, 2015 from the south sidewall of the original excavation following removal of impacted material from the pit. At the time of the sample collection, it was assumed that the sample exceeded the COGCC Allowable Limits based on the field screening (i.e., observed visual staining and odors). Nonetheless, CS28-SW was collected to confirm this assumption.

The excavation at the sample collection location was 17-feet below ground surface (bgs) and CS28-SW was collected from approximately 3 feet from the base of the excavation on the sidewall. As shown on the attached **Figure 1**, the location of CS28-SW corresponds with the original south sidewall of the pit excavation. After receiving the analytical results for CS28-SW, which exceeded the COGCC allowable limits for TPH and benzene confirming the assumption, additional excavation was performed to remove soil exceeding

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the allowable limits. Field screening was performed to ensure the remaining impacted material was removed followed by confirmation sampling.

From the removal of additional material, the excavation was extended 5-6 additional feet vertically to a depth of 25-26 feet bgs and laterally 40-45 feet to the southeast beyond the lateral extent of the original footprint of the pit (see attached **Figure 1**). Following removal of the additional excavated material, odors and visual impacts were not observed within the excavation. Two areas were then sampled from the south sidewall of the extended excavation, CS28-SW 2 and CS28-SW 3, in order to confirm whether the COGCC allowable limits for TPH and benzene had been met. Both of these samples resulted in concentrations below the COGCC allowable limits for TPH and benzene.

The closure activities were performed as stated in the approved Form 27 for the CS28 Pit, which included the following conditions:

- 3-5 discrete samples should be taken from pit wall; with at least one from the true pit bottom, samples should be analyzed for Table 910-1 analytes. Guidance for sample locations should be taken from rule 910.b(2)B (the sample locations were collected from the most likely areas to be impacted based on field screening).
- Operator should provide notice to Environmental staff, Kris Neidel, via email (kris.neidel@state.co.us) or phone at 970-871-1963 upon mobilization at the beginning of work AND when the location is ready for pit bottom confirmation sample collection.
- Final report should include an aerial photograph depicting the exact locations of discrete pit wall and bottom samples.

Chevron Environmental Management Company (EMC) has continued to perform the pit closures consistent with the procedures used under previously approved Forms 27 for previous pits in the Rangely Field. Activities at these pits have resulted in approved closures utilizing similar techniques as those utilized at the CS28 Pit. As described above, CEMC feels that activities at the CS28 Pit were performed in accordance with COGCC direction under the approved Form 27. Furthermore, the final confirmation sampling demonstrates that all material above the Allowable Limits has been removed from the CS28 Pit.

CEMC is pleased to continue working with COGCC to refine the techniques used on future pit closures in the Rangely Field to streamline the closure process. CEMC would like to arrange a meeting at your convenience with you to discuss this further either in Denver or in your field office.

Sincerely,

A handwritten signature in black ink, appearing to be 'MB' with a long horizontal stroke extending to the right.

Marcelo Barberis

Attachment: Figure 1

cc: Jim Litz (AECOM)

