



STATE OF
COLORADO

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

Fwd: Duncan Ranch cuttings management

1 message

Neidel - DNR, Kris <kris.neidel@state.co.us>

Thu, Jun 23, 2016 at 4:07 PM

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

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Additional Instructions		

Kris Neidel
Environmental Protection Specialist Northwest Area
Colorado Oil and Gas Conservation Commission
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COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

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

From: **Rick Obernolte** <rickobe1@aol.com>

Date: Tue, Jun 21, 2016 at 11:45 AM

Subject: Re: Duncan Ranch cuttings management

To: kris.neidel@state.co.us

Cc: jcar75@msn.com

Kris,

Good morning,

Thank you. We will provide an updated frequency of sampling/monitoring and it will include the sampling method and a list of constituents to be sampled. We plan to turn the cuttings every two weeks during the proposed two month drying period. We will provide information on nutrient loading as soon as we have the information from the contractor. I plan to submit a sundry notice with this information before the end of this week.

Since TPH is the principal concern I think that we will focus the monitoring mainly on the hydrocarbons; with an initial check on the inorganic constituents and again prior to our request to bury the cuttings. Is that sufficient for the inorganics? We will also obtain samples from the bottom of the cuttings pit to determine natural soil background levels for the full range of soil constituents listed in Table 910-1.

We will file monthly updates on activities and performance.

Thanks again,

Rick

Rick Obernolte
Access Environmental, LLC
106 South White Tail Drive
Franktown, Colorado 80116-8825
Tel: (303) 660-9633
Cell: (303) 810-4345
rickobel@aol.com

-----Original Message-----

From: Neidel - DNR, Kris <kris.neidel@state.co.us>
To: Rick Obernolte <rickobel@aol.com>
Cc: jcar75 <jcar75@msn.com>
Sent: Tue, Jun 21, 2016 10:52 am
Subject: Re: Duncan Ranch cuttings management

Rick,

Attached is a signed copy of the approved Form 27. Please include the following Conditions of Approval in your project planning....

- Berms around the remediation land treatment area(s) shall be sufficient to prevent stormwater run on and runoff. Berms shall be maintained at all times.
- Any accumulation of fluid in the remediation land treatment area(s) shall be removed upon detection. All remediation land treatment area(s) shall monitored after any significant precipitation event.
- The frequency of turning the material twice (July and August) does appear to be adequate in remediation of the cuttings to table 910-1. A more frequent schedule should be provided including any nutrient loading, surfactants, etc.
- The frequency of sampling to monitor progress of the remediation land treatment area(s) is inadequate (ie. once dried 3-5 representative composite samples will be collected) shall be provided to the COGCC within two (2) weeks of approval of this Form 27.

- The method sampling and constituents to be sampled and analyzed to monitor progress of the remediation land treatment area(s) shall be provided to the COGCC within two (2) weeks of approval of this Form 27.
- Only Drill Cuttings material from the Location shall be placed and treated in the remediation land treatment area(s). No additional wastes shall be treated in the remediation land treatment area(s).
- At a minimum, monthly updates of activities performed in remediation land treatment area(s) shall be provided to the COGCC in Supplemental Form 27s via Sundry notice.
- Adequate DISCRETE confirmation samples shall be collected and analyzed for Table 910-1 including: PAHs, TPH diesel range organics (DRO), gasoline range organics (GRO), and oil range organics (ORO).
- Land Treatment of oily waste shall be performed in strict accordance with the requirements of COGCC Rule 907.e.(2).
- PRM shall complete remediation within three years of the date of this conditional approval – by June 22, 2019. In the event any treated waste fails to meet Table 910-1 standards within three (3) years, 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.
- The Form 27 is conditionally approved; however, additional information or activities may be required during the course of remediation.

I will respond with the project number

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On Fri, Jun 17, 2016 at 10:19 AM, Rick Obernolte <rickobe1@aol.com> wrote:

Alex,

Good morning,

As we discussed yesterday attached is Form 27/27a requesting permission to spread drill cuttings from the cuttings pit onto a portion of the well pad to dry them prior to burial. I have also included the preliminary soil analyses from two composite samples of the drill cuttings. A well pad plat is attached to show the proposed drying area with the storm water diversion ditch and the containment berm.

An upgradient storm water ditch has been installed to divert storm water runoff around the area into the existing storm water collection system. The drying area has been bermed with subsoil from the subsoil stock pile and excavated from the new storm water diversion ditch. The operator would like permission to begin spreading the drill cuttings next week.

Thanks for your time and assistance,

Rick

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