



STATE OF  
COLORADO

EnviroScan - DNR, OGCC <dnr\_ogcc.enviroscan@state.co.us>

## Fwd: FW: Gamma State 14-15 Pit - Reclamation Request

1 message

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

Mon, Jul 11, 2016 at 12:44 PM

To: OGCC EnviroScan - DNR <dnr\_ogcc.enviroscan@state.co.us>

please upload this email

<b>Document Name(s)</b>	notice of NFA	
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<b>Indexing Information</b>	<b>Unique ID Type</b>	<b>Unique ID Number</b>
<b>First</b>	Remediation (REM)	9024
<b>Second</b>	Facility ID (FAC)	443910
<b>Third*</b>	NOAV	313399
<b>Additional Instructions</b>		

Kris Neidel  
 Environmental Protection Specialist Northwest Area  
 Colorado Oil and Gas Conservation Commission  
 Office [970-871-1963](tel:970-871-1963)  
 Cell [970-846-5097](tel:970-846-5097)



**COLORADO**  
 Oil & Gas Conservation  
 Commission  
 Department of Natural Resources

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

From: **Neidel - DNR, Kris** <[kris.neidel@state.co.us](mailto:kris.neidel@state.co.us)>

Date: Mon, Jul 11, 2016 at 12:43 PM

Subject: Re: FW: Gamma State 14-15 Pit - Reclamation Request

To: Brandon Yaw <[Brandon\\_Yaw@swm.com](mailto:Brandon_Yaw@swm.com)>

Cc: Cheryl Rowell <[Cheryl\\_Rowell@swn.com](mailto:Cheryl_Rowell@swn.com)>

Remediation Project 9024 has been CLOSED with the following statement;

Based on review of information, No Further Action is required at this time. Should conditions at the site indicate contaminant concentrations in soils exceed COGCC standards, further investigation and/or remediation activities may be required at the site.

Pit Facility id 443910 has been closed as a result of the data presented.

This email will be uploaded to the project files as notice of No Further Action.

Attached is a signed copy of the Final Form 27.

Thank you,

Kris Neidel  
Environmental Protection Specialist Northwest Area  
Colorado Oil and Gas Conservation Commission  
Office [970-871-1963](tel:970-871-1963)  
Cell [970-846-5097](tel:970-846-5097)



On Thu, Jul 7, 2016 at 11:28 AM, Brandon Yaw <[Brandon\\_Yaw@swn.com](mailto:Brandon_Yaw@swn.com)> wrote:

Kris,

See attached consolidated report regarding closure of the Gamma State pit. If there's anything that needs to be added to this, just let us know, and we'll get it taken care of. If the commission is good with this, we can start closing the pit as soon as we have approval.

Thanks,

**M. Brandon Yaw**  
**Production Engineer**



Direct: 832-796-6043  
Cell: 713-417-8537

[brandon\\_yaw@swn.com](mailto:brandon_yaw@swn.com)

**From:** Neidel - DNR, Kris [mailto:[kris.neidel@state.co.us](mailto:kris.neidel@state.co.us)]  
**Sent:** Thursday, June 30, 2016 9:45 AM  
**To:** Brandon Yaw  
**Cc:** Cheryl Rowell  
**Subject:** Re: FW: Gamma State 14-15 Pit - Reclamation Request

Brandon,

Please update the final request for closure while addressing the questions from my previous email. The Goal is to have one document that presents all the data, this document will "live" with this location and should prove clearly and simply that no remaining impact was left.

"the sample depths for the confirmation samples, including; EB-03/EB-06, PB-03/PB-05, PB-02/PB-04?" Please present this information with the appropriate soil sample. eg if sample EB-06 was taken at the same location as EB-06, the sample depths and dates will make that apparent.

If the COA's, dated 3/11/2016 can not be met specifically, but SWN feels they were addressed with other full 910-1 samples taken (previously), please present the early data in the final report...

"Discrete sample(s) shall be taken and analyzed for the full COGCCs Table 910-1. Concentrations Levels in the vicinity of PB-02, PB-03, and EB-03 including: organic compounds in soil, inorganics in soil and metals in soil. Detection Levels shall be for Table 910-1 and not the EPA Regional screening Level Standards or the CDPHE GPV Standards for PAHs." Were any samples for the full table 910-1? if so please provide.

Thanks again for your effort on this,

Kris Neidel

Environmental Protection Specialist Northwest Area

Colorado Oil and Gas Conservation Commission

Office [970-871-1963](tel:970-871-1963)

Cell [970-846-5097](tel:970-846-5097)



On Mon, Jun 27, 2016 at 6:21 AM, Brandon Yaw <[Brandon\\_Yaw@swn.com](mailto:Brandon_Yaw@swn.com)> wrote:

Kris,

See below from LTE on the Gamma State pit. Is this what you're looking for?

**M. Brandon Yaw**  
**Production Engineer**



Direct: 832-796-6043  
Cell: 713-417-8537

[brandon\\_yaw@swn.com](mailto:brandon_yaw@swn.com)

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**From:** Chris Roy [mailto:[croy@ltenv.com](mailto:croy@ltenv.com)]  
**Sent:** Friday, June 24, 2016 10:09 AM  
**To:** Brandon Yaw; Cheryl Rowell; Steve Kahn  
**Subject:** RE: Gamma State 14-15 Pit - Reclamation Request

Brandon,

As discussed, sample depths were not included in the sample name only because they were collected from the bottom of an open pit.

The pit bottom was approximately 10' bgs when the first round of floor samples were collected (PB-02, PB-03, EB-03). When these samples failed, our field notes read:

*November 13, 2015: Analytical results confirmed that two samples (PB-02 and PB-03) exceeded Table 910 standards for TPH at 1,636 mg/kg and 562 mg/kg, respectively. Several more inches were scrapped off the pit bottom in the vicinity of PB-02 and PB-03, and two more confirmation soil samples (PB-04 and PB-05) were collected.*

*November 16, 2015: Analytical results confirmed that one soil sample from the base of the excavation (EB-03) did not pass. A couple inches of soil from the vicinity of EB-03 was removed for a re-sample.*

So to answer your question regarding sample depths, I'd say PB-02, PB-03, and EB-03 were collected at 10' bgs. PB-04, PB-05, EB-06 were collected at 10'4" bgs.

Regarding the Full Table 910 – see the attached analytical report and associated summary table. These samples were collected in July 2015 after the pit liner was removed. Full 910 was analyzed. You can see that only the TPH, Arsenic, and EC exceeded the standards. Arsenic is no surprise, given how low the threshold is and the background levels of arsenic in soil throughout Colorado. EC will not be an issue once the pit is backfilled and those sample locations will be well below the root-bearing zone of vegetation. That leaves us TPH exceedances, which is probably why the scope of work for the Pit Excavation only included TPH analysis.

Let me know if you need anything else from us.

Thanks,

Chris Roy

Project Scientist

(303) 829-5763 cell

(303) 962-5524 direct

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**From:** Brandon Yaw [mailto:Brandon\_Yaw@SWN.COM]

**Sent:** Thursday, June 23, 2016 2:34 PM

**To:** Chris Roy <croy@ltenv.com>; Steve Kahn <skahn@ltenv.com>

**Cc:** Cheryl Rowell <Cheryl\_Rowell@SWN.COM>

**Subject:** Fwd: Gamma State 14-15 Pit - Reclamation Request

FYI Chris and Steve.

Brandon Yaw

713-417-8537

Begin forwarded message:

**From:** "Neidel - DNR, Kris" <[kris.neidel@state.co.us](mailto:kris.neidel@state.co.us)>  
**Date:** June 23, 2016 at 3:01:22 PM CDT  
**To:** Cheryl Rowell <[Cheryl\\_Rowell@swm.com](mailto:Cheryl_Rowell@swm.com)>  
**Cc:** Brandon Yaw <[Brandon\\_Yaw@swm.com](mailto:Brandon_Yaw@swm.com)>  
**Subject:** Re: Gamma State 14-15 Pit - Reclamation Request

Cheryl,

Can you provide the sample depths for the confirmation samples, including; EB-03/EB-06, PB-03/PB-05, PB-02/PB-04?

I do not see any samples for full table 910-1. Per COA's from the updated Form 27, dated 3/11/2016..."Discrete sample(s) shall be taken and analyzed for the full COGCCs Table 910-1. Concentrations Levels in the vicinity of PB-02, PB-03, and EB-03 including: organic compounds in soil, inorganics in soil and metals in soil. Detection Levels shall be for Table 910-1 and not the EPA Regional screening Level Standards or the CDPHE GPV Standards for PAHs." Were any samples for the full table 910-1? if so please provide.

Kris Neidel

Environmental Protection Specialist Northwest Area

Colorado Oil and Gas Conservation Commission

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On Mon, Jun 20, 2016 at 2:31 PM, Cheryl Rowell <[Cheryl\\_Rowell@swm.com](mailto:Cheryl_Rowell@swm.com)> wrote:

Kris,

Per your and Brandon's phone conversation this morning, attached is the Form 27 with LTE's Remediation Activity Summary. The Summary includes a site map indicating sampled sites with Table I containing the analytical results.

Please let Brandon or me know if you have any questions, and/or your approval to proceed with reclamation.

Regards,

Cheryl

**Cheryl Rowell** | Sr. Staff Regulatory Analyst

**SWN Production Company, LLC**

Sand Wash Basin Team - New Ventures

*Physical: 10000 Energy Drive, Spring, TX 77389*

*Mailing: P.O. Box 12359, Spring, Texas 77391-2359*

Phone: 832.796.7439 | Cell: 713.542.0648

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