



STATE OF  
COLORADO

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

## Fwd: Robidoux 13-7 Remediation Project number 8432

1 message

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

Wed, Sep 21, 2016 at 4:50 PM

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

please upload email as, "project results and communication"

<b>Document Name(s)</b>		
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<b>Indexing Information</b>	<b>Unique ID Type</b>	<b>Unique ID Number</b>
<b>First</b>	Remediation (REM)	8432
<b>Second</b>	Facility ID (FAC)	313233
<b>Third*</b>	NOAV	
<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: Wed, Sep 21, 2016 at 4:39 PM

Subject: Re: Robidoux 13-7 Remediation Project number 8432

To: Kristen Stocks <[KStocks@entekenergy.com](mailto:KStocks@entekenergy.com)>

Cc: "Fischer - DNR, Alex" <[alex.fischer@state.co.us](mailto:alex.fischer@state.co.us)>, Kim Parsons <[KParsons@entekenergy.com](mailto:KParsons@entekenergy.com)>, Carolyn Hewit <[CHewit@entekenergy.com](mailto:CHewit@entekenergy.com)>, David Smith <[DSmith@entekenergy.com](mailto:DSmith@entekenergy.com)>

Kristen,

The request for closure on project 8432 is denied. The approved Workplan, project number 8432 was not followed in the collection of samples.

The total depth of samples, at five locations, was one foot below the ground surface. The approved method for sampling was to collect one sample every three feet with a total depth of twelve feet.

Additionally, Sample "#3 3-6 inches " has a Total Petroleum Hydrocarbon (TPH) concentration of 880 mg/kg, the COGCC limit is 500.

Entek should submit a eForm 19, Spill report for the detection of this release, by 9/22/2016 (per Conditions of Approval of project number 8432).

A form 27 outlining the full investigation and delineation of contamination should be submitted by October 6, 2016.

Thanks,

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 Tue, Sep 20, 2016 at 2:44 PM, Kristen Stocks <[KStocks@entekenergy.com](mailto:KStocks@entekenergy.com)> wrote:

Kris,

Per our discussion about the Robidoux 13-7 pit sampling program that was outlined in the attached Form 27 that was filed with the COGCC before any activity took place (Robidoux 13-7 Form 27 Page 1), please find attached sample results from the sampling program (ENTEK S1411001.pdf & 2 xls files) as well as an approval for a variance from the initially agreed upon procedure (FW: BKS – Soil Sampling). Please find all attached as well as an additional Form 27 to satisfy the finalization requirements (Doc – Sep 20 2016).

Please let me know if you will need anything else from us to finalize this remediation.

ENTEK S1411001.pdf & 2 xls files are sample results

Robidoux 13-7 Form 27 Page 1 is the initial Form 27

FW: BKS – Soil Sampling is the email variance approval

Doc – Sep 20 2016 is the second Form 27 for this activity.

Thank you very much!

Kristen W. Stocks

Sr. Staff Engineer – Entek Energy

Cell: [307 200 1930](tel:3072001930)

E Fax: [720 210 9125](tel:7202109125)

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[kstocks@entekenergy.com](mailto:kstocks@entekenergy.com)



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

From: Kristen Stocks <[KStocks@entekenergy.com](mailto:KStocks@entekenergy.com)>

To: "Sean O'Hearn" <[sean.ohearn@enertiagc.com](mailto:sean.ohearn@enertiagc.com)>

Cc:

Date: Tue, 23 Jun 2015 15:57:51 +0000

Subject: FW: BKS- Soil Sampling

Kristen W. Stocks

Sr. Staff Engineer – Entek Energy

Cell: [307 200 1930](tel:3072001930)

E Fax: [720 210 9125](tel:7202109125)

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535 16 St, Suite 620

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kstocks@entekenergy.com



**From:** Fischer - DNR, Alex [mailto:[alex.fischer@state.co.us](mailto:alex.fischer@state.co.us)]

**Sent:** Wednesday, October 22, 2014 2:19 PM

**To:** Kristen Stocks

**Cc:** Neidel - DNR, Kris

**Subject:** Re: BKS- Soil Sampling

Kirsten,

This is not the ideal way of collecting representative samples using solid flight auger at 3' intervals. That said, it is the COGCCs understanding that there will be four (4) discrete samples from each sample locations.

0-3 feet

3-6 feet

6-9 feet, and

9-12 feet.

**The four (4) discrete samples from each location shall be analyzed for the complete 910-1 table of constituents.**

Please note the the COAs on the approved Form 27 as follows:

***Form 27 is approved per COAs : Notify EPS staff, Kris Neidel via email or phone (970-871-1963) 72 hrs prior to mobilization of crew for sample activates. Continuous field screening of samples collected during that advancement of the solid stem fight auger and sampling should be evaluated with a PID or equivalent method. If impacts are discovered, operator should be guided by Rule 910.b(3)B. to determine the horizontal and vertical impact of impact. At least five discrete soil samples shall be collected from beneath the pit and along sidewalls to adequately characterize whether an impact has occurred. Composite samples will NOT be accepted. Samples shall be analyzed for the constituents listed in table 910-1. If an impact is discovered during sampling, operator should submit a Form 19 per rule 905.c. If exceedances of table 910-1 due to background levels in native soil are anticipated; sufficient background samples should be taken to demonstrate undisturbed native background levels. Work plan is conditionally approved; however additional information may be required during the course of investigation and remediation.***

As Kris indicated, he will not be available. Although I will be on travel on October 30, 2014. I am available via email before and after October 30, 2014.

Thanks

Alex

On Wed, Oct 22, 2014 at 1:59 PM, Neidel - DNR, Kris <[kris.neidel@state.co.us](mailto:kris.neidel@state.co.us)> wrote:

I will be on vacation. You should proceed with the investigation on your schedule.

Thanks for the notice.

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 Wed, Oct 22, 2014 at 12:52 PM, Kristen Stocks <[KStocks@entekenergy.com](mailto:KStocks@entekenergy.com)> wrote:

We are planning to sample the Robidoux 13-7 pit with the below explained equipment next thursday. Will that work with your schedule?

Thank you.

Kristen Stocks

[307-200-1930](tel:307-200-1930)

Sent from my iPhone

Begin forwarded message:

**From:** Cindy Adams <[cadams@bksenvironmental.com](mailto:cadams@bksenvironmental.com)>

**Date:** October 22, 2014 at 11:10:56 AM MDT

**To:** "[kstocks@entekenergy.com](mailto:kstocks@entekenergy.com)" <[kstocks@entekenergy.com](mailto:kstocks@entekenergy.com)>

**Cc:** Mike Kasten <[MKasten@bksenvironmental.com](mailto:MKasten@bksenvironmental.com)>  
**Subject:** BKS- Soil Sampling

Kristin,

Thank you for talking with me this morning.

BKS has a 4" hollow stem auger, NOT a split spoon. However, we have conducted TPH sampling for other clients using the hollow stem auger. I have included our methodology below.

1. The Giddings truck mounted auger utilized by BKS is a rotary soil exploratory machine which is permanently mounted to the bed of a standard pickup truck, and is operated from the rear of the truck.
2. Soil samples will be collected in 3 foot intervals to a final depth of 12 feet, or deeper if necessary.
3. Soil auguring will be performed with 4 inch diameter continuous flight helical drill stem. Soil material (cuttings) augured below surface will be carried to the surface by the rotary action of the auger. No mud, drilling fluids, or pressurized air will be used to facilitate removal of cuttings.
4. Dry soil cuttings brought up to the boring surface during auguring will be composited for the entire 3 foot interval.
  5. BKS will take a GPS point location at each sample location and will create a map of sample points.
  6. No post-sampling write-up will be necessary, except for hand drawn maps of each sampling site showing sampling locations.

If you would like to move forward on this. Please provide us:

1. Consulting agreement
2. Directions to the site
3. GPS location of the site
4. What laboratory do you want to use? We will need to obtain suitable containers from the laboratory.
  - a. Will the lab be onsite during the collection?
5. Is there any equipment restrictions working near the CBM well head? We have a ball-peen hammer that may create sparks.
6. We are available October 30<sup>th</sup>. We propose meeting you out by the green tanks around 10am.

We look forward to working with you on this project. Thanks!

*Cindy Adams*

**BKS Environmental Associates, Inc.**

[www.bksenvironmental.com](http://www.bksenvironmental.com)

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**Alex Fischer, P.G.**

**Environmental Supervisor, Western Colorado**



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

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