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REM 9317
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Berry 63N67W8SENE location (Rem. No. 9317)

1 message

Schneider, Paul <Paul.Schneider@anadarko.com>

Thu, Oct 20, 2016 at 2:50 PM

To: "Peter Gintautas (peter.gintautas@state.co.us)" <peter.gintautas@state.co.us>

Cc: "Hamlin, Phil" <Phil.Hamlin@anadarko.com>

Hello Peter,

Per our discussion this morning... We respectfully ask that you reconsider the denial of our Form 27 NFA request for the Berry 63N67W8SENE location (Rem. No. 9317). The COGCC has approved numerous NFA requests similar to this one (i.e. sites where impacted groundwater was removed during excavation activities, initial monitoring well analytical results were below laboratory reporting limits, and as such 4 quarters of groundwater monitoring were unnecessary). The reasons we are asking you to reconsider this NFA request are as follows:

- While historical, the impacts appear to be related to the produced water sump at this location. Soil impacted above Table 910-1 standards was centered (and subsequently removed from) beneath the sump.
- No sensitive receptors were identified within the immediate vicinity of the release location.
- Impacted soils were remediated (via excavation) to below Table 910-1 standards.
- Potential impacts within the phreatic zone were removed via excavation.
- Impacted groundwater was removed from the excavation via vacuum truck.
- BTEX concentrations in the excavation groundwater sample collected subsequent to groundwater removal were not only below Table 910-1 standards, but were also below the laboratory reporting limits.
- Prior to backfilling the excavation, activated carbon was added to the groundwater within the excavation to mitigate any remaining aqueous-phase impacts.
- BTEX concentrations from all monitoring wells were not only below Table 910-1 standards, but were also below the laboratory reporting limits. This includes monitoring wells located directly downgradient of the release area.

We hope that after you review the data again, you will agree that this site has been successfully remediated and that an NFA is warranted for this location. Thank you for your consideration.

Paul Schneider, PG

HSE Manager – DJ Basin

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