



Re: COGCC Review of Annual Monitoring Report

1 message

Axelson - DNR, John <john.axelson@state.co.us>

Thu, Jan 19, 2017 at 1:55 PM

To: Jeff Freitas <jeff.freitas@topoperating.com>

Cc: Paul Herring <paul.herring@topoperating.com>, Rod Herring <rod.herring@topoperating.com>, Paul Herring <murray.herring@topoperating.com>, "Canfield, Chris" <Chris.Canfield@state.co.us>, "EnviroScan, OGCC" <ogcc.enviroscan@state.co.us>, Brad.Schol@longmontcolorado.gov

Mr. Paul Herring,

Thank you for providing the update I requested by the due date. After a review of your response and a detailed review of the remediation project file, I have the following comments:

- Your December 29, 2016, response did not address the specific request for information regarding the soil washing events that were proposed in the approved plan.
- The update did not provide a plan with a schedule to perform any additional soil washing or alternate remediation to bring site soil and groundwater into compliance with Table 910-1 standards.

As a result, I am requesting a formal supplemental workplan be submitted for the Serafini Gas Unit Tank Battery no later than February 24, 2017.

The work plan shall include the following information:

1. A scaled site diagram depicting the location of all existing monitor wells on the site. The diagram shall also depict the location of the test pits that were documented in the September 14, 2012 Olsson Associates, Limited Subsurface Investigation Report. A copy of the report is attached for your reference.
2. A potentiometric surface map of groundwater based on current depth to water measurements in each monitor well. The map shall depict groundwater gradient/flow direction.
3. Based on the September 14, 2012 report, there is no indication that the lateral extent of soil impacts documented in Test Pit 1 were ever defined to the south or west. Propose sufficient soil sampling to verify no impacts to the south or west of TP-1. Proposed soil boring or test pit locations shall be included on the supplemental workplan. If there are not currently enough monitor wells in place to establish the groundwater gradient, then propose one or more of the additional soil borings be constructed as a monitor well(s) as needed to establish the gradient.
4. Collect additional soil samples at the Test Pit 1 location to determine the current TPH concentration remaining in soil.
5. If the riser at Test Pit 1 is not intact for sampling, replace it with a properly constructed monitor well. If it is not intact, properly abandon it.
6. If groundwater was extracted from the Test Pit 1 sump, provide dates that the work was performed and the volume of water recovered as well as groundwater sample results. Also provide disposal documentation for the groundwater.
7. Provide documentation of the flow line pressure tests referenced in your December 29, 2016 update.
8. Propose a plan to perform hydrostatic tests on the two partially buried water tanks at the tank battery to verify integrity.
9. Continue routine monitoring of the existing wells on the site no less than quarterly. If you have agreed with Longmont to sample monthly COGCC concurs with that plan. Please provide those details on the workplan.
10. Provide a specific implementation schedule with the work plan not to exceed 90-days from approval of the plan to completion of field work and final reporting of all work required.

Please submit the supplemental workplan, with a reference to Rem #6883, to the area EPS Chris Canfield and copy me at the same time. If you have any questions regarding this request please give me a call, or if you would like to discuss in person, I would be happy to meet with you.

Sincerely,

John E. Axelson, P.G.
East Environmental Supervisor



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894.2100 x5115 | F 303.894.2109 | C 303-916-0527

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Cc. Rem #6883 - Correspondence

On Thu, Dec 29, 2016 at 2:28 PM, Jeff Freitas <jeff.freitas@topoperating.com> wrote:
Mr. Axelson

Please see attached document containing an update you requested regarding Project # 6883.

TOP Operating Co. also has sent a copy of this update via certified mail address to you on 12/29/2016.

Any questions please let us know.

Regards,

Jeff Freitas

On Wed, Nov 16, 2016 at 3:17 PM, Rodney K. Herring <rod.herring@topoperating.com> wrote:

Rod

Rodney K. Herring,
TOP Operating Co.
3609 S. Wadsworth Blvd., Ste. 340
Lakewood, CO 80235
(303) 727-9915 x.200

To share large attachments with me, please use:
<https://www.hightail.com/u/topoperatingco>



From: "Axelson - DNR, John" <john.axelson@state.co.us>
To: murray.herring@topoperating.com
Cc: rod.herring@topoperating.com, "Canfield, Chris" <Chris.Canfield@state.co.us>, "EnviroScan, OGCC" <ogcc.enviroscan@state.co.us>
Date: Wed, 16 Nov 2016 15:15:59 -0700
Subject: Fwd: COGCC Review of Annual Monitoring Report
Attachments: Longmont Monitoring Report Review Letter 11-16-16.pdf [71K]

Mr. Herring,

Please see the attached letter for the COGCC response to the 2016 Annual Monitoring Report prepared by Terracon for the City of Longmont. Rod Schol at Longmont sent us the report in case actions were warranted due to some of

the results. The only issue that we found to be actionable was the detection of benzene in SGU-MW02 at the Sarafini Gas Unit location. As you are aware, TOP Operating has an approved Form 27 (Rem Proj #6883) for that site.

COGCC has not received an update on that project since 2014. Please provide a project update with information regarding any additional soil washing events that were performed at the location after the 2014 Olsson Associates report (Doc #2526639) was provided. In addition, provide a plan with a schedule to perform any additional soil washing or alternate remediation to bring site soil and groundwater into compliance with Table 910-1 standards. Please provide this update by 12/31/16 with a reference to Proj #6883.

If you have any questions, please feel free to give me a call.
Thank you,

John E. Axelson, P.G.
East Environmental Supervisor



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Cc. Proj #6883 - Correspondence

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

From: **Axelson - DNR, John** <john.axelson@state.co.us>
Date: Wed, Nov 16, 2016 at 2:21 PM
Subject: COGCC Review of Annual Monitoring Report
To: Brad.Schol@longmontcolorado.gov
Cc: Matt Lepore <matt.lepore@state.co.us>, "Deranleau - DNR, Greg" <greg.deranleau@state.co.us>, Marc Morton - DNR <marc.morton@state.co.us>, "Prince, Nancy" <Nancy.Prince@state.co.us>

Mr. Schol,

Marc Morton provided me with a copy of the Annual 2016 Monitoring Report prepared by Terracon for the City of Longmont. I have provided review comments in the attached letter. Please let me know if you have any questions.
Thank you,

John E. Axelson, P.G.
East Environmental Supervisor



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Jeffrey H. Freitas
TOP Operating Co.

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TOP Serafini Gas Unit Olsson Report 9-14-12.pdf

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