



Fwd: Tepee Park Ranch Pit Facility ID 416339, Pit Facility ID 334460, and Land Treatment Facility ID 334457

1 message

Fischer - DNR, Alex <alex.fischer@state.co.us>
To: OGCC EnviroScan - DNR <dnr_ogcc.enviroscan@state.co.us>
Cc: Carlos Lujan - DNR <carlos.lujan@state.co.us>

Wed, Nov 1, 2017 at 11:10 AM

Scanning Work Request:

Please upload this email as follows:

Document Name(s)	1. Nov 1, 2017 COGCC email Correspondence to Operator	
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Date Received	12/1/2015	
Is data entry needed?	NO	
Indexing Information	Unique ID Type	Unique ID Number
First	Facility ID	416339
Second	Facility ID (FAC)	334460
Third*	Facility ID	334457
Additional Instructions		

Thanks!

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Alex Fischer, P.G.

Environmental Supervisor, Western Colorado

P 303.894.2100 x5138 | F 303.894.2109

1120 Lincoln Street, Suite 801, Denver, CO 80203

| alex.fischer@state.co.us www.colorado.gov/cogcc

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

From: **Fischer - DNR, Alex** <alex.fischer@state.co.us>

Date: Wed, Nov 1, 2017 at 11:08 AM

Subject: Tepee Park Ranch Pit Facility ID 416339, Pit Facility ID 334460, and Land Treatment Facility ID 334457

To: "griggs.mary" <griggs.mary@comcast.net>

Cc: Carlos Lujan - DNR <carlos.lujan@state.co.us>

Mary,

Thank you for your time yesterday. As we discussed, the following is what will be needed to help get CPX Piceance Holdings, LLC into compliance.

Pit Facility ID 416339

Based on our October 31, 2017 conversation by CPX Piceance Holdings LLC the following is required to keep this open.

- Submit an eForm 4 Sundry request that outlines CPX Piceance Holdings LLC intention on the use of this Pit Facility. The eForm 4 must include a Rule 502.b. stating that CPX Piceance Holdings LLC is requesting a variance to Rule 902.e. for extending the Pit Permit for greater than 3-years and use of the Pit. NOTE: Detail plans of the pit use and future use must be included. (There are no guarantees that the Director will grant a variance).
- Within 45-days of this email, submit Financial Assurance to cover the cost of decommission Pit Facility ID 416339, remediating environmental impacts (if any), and reclaiming the Pit Facility.
- If CPX Piceance Holdings LLC intends to convert the Pit Facility to a centralized exploration and production facility (CE&P), within 90-days of this email submit a Form 28 Centralized E&P Permit Application providing details per Rule 908 and 904.d.

If CPX Piceance Holdings LLC elects not to submit a variance request, financial assurance, and Form 28 Application, and in order to get CPX Piceance Holdings LLC into compliance, the following is required within 45-days of this email.

- Submit an eForm 27 Site Investigation and Remediation Work Plan closing Pit Facility ID 416339.

Pit Facility ID 334460

Additionally, you indicated that Pit Facility ID 334460 was never constructed. Review of the data base indicates that the Pit Permit was approved January 2, 2014, therefore as is, this Pit Permit has expired. The following is needed to close this Pit Permit:

- Submit an eForm 27 with documentation and a statement that the Pit Facility was never constructed and that CPX Piceance Holdings LLC respectively requests closure of Pit Facility ID 334460.

Land Treatment Facility ID 334457

- Per Inspection Document Number 689100078 dated October 3, 2017 (attached), Submit an eForm 27 by November 3, 2017 addressing the corrective action outlined:

1) Within 30-days of submission of this Inspection, submit via e-Form 27 a Remediation Work Plan providing specific details in how CPX had treated the first lift of cuttings, including dates of tilling, disking, addition of nutrients, etc.. These details shall include how CPX was able to monitor the effectiveness of the land treatment, including a map(s) illustrating the location(s) and depths of where the samples were collected. All supporting analytical including the complete reports with chain of custody shall be included as part of this submittal. 2) Within 30-days of submission of this Inspection, submit via e-Form 27 a Remediation Work Plan providing the results of the August 2017 second lift sampling including how the second lift of cuttings was treated capturing details provided in #1 above. 3) Within 30-days of submission of this Inspection, submit via eForm-27 a Remediation Work Plan, to address the treatment or disposition of the second lift material with constituents above Table 910-1, including PAHs and of the remaining cuttings currently stock piled. 4) Within 45-days of submission of this Inspection, provide enough Financial Assurance to address remediation of the remaining cuttings and stock pile equivalent to the cost of disposing them to an approved facility (i.e. Landfill or other). The COGCC will review the amount of Financial Assurance received and will determine whether it is adequate to cover the cost of remediation of the remaining material.

NOTE: The COGCC discourages the land treatment at an elevation of 8500 to 9000 feet above mean sea level (msl). Some of the target constituents include (benzo a pyrene) which can be very challenging to remediate to Table 910-1 constituent levels.

The COGCC is open to meeting with you to further discuss the Pit and Land Treatment issues.

Thanks
Alex
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