REM 18
Document 2496158

**From:** Steven Arauza - DNR
**To:** "ETrzcinski@trcsolutions.com"; "Harvey, Christopher"
**Cc:** John Axelson - DNR
**Subject:** Action Required: Hambert Compressor Station Remediation (Remediation Project #18) 2017 Annual Report
**Date:** Friday, December 15, 2017 1:35:00 PM
**Attachments:** Hambert comparison.pdf

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Good morning Chris and Elliot,

The COGCC has reviewed the 2017 Groundwater Monitoring Report (doc #2495863) that was submitted for approval under Remediation Project #18. The Groundwater Monitoring Report indicates benzene concentrations of 1,990 µg/L and 19 µg/L at MW004 and MW006, respectively. The Results section of the 2017 report *speculates* that the presence of benzene in these wells is related to an historical release (Facility ID #440852/Remediation Project #9675), which was reported to the COGCC by Kerr McGee Oil & Gas Onshore LP (KMG) in February of 2015. The COGCC has reason to dispute this speculation for reasons listed below.

1) The extent of groundwater impacts from Spill/Release #440852 were sufficiently delineated via samples collected on 3/26/2016, as reported to the COGCC on 5/19/2016 via document #401050340.

2) Samples collected by KMG for annual groundwater reporting on 5/11/2017 demonstrate the stability of the BTEX plume, as reported to COGCC on 8/7/2017 via document #401368052.

3) Both KMG reports establish points of compliance (BH07, BH08, and BH11—see attached) with BTEX standards that are both downgradient of the spill source and upgradient of the location that is subject to TRC Remediation Project #18.

4) March 2017 analytical results for MW005 were ND for BTEX, indicating that there were no impacts to upgradient well MW005 from the same speculated source of impacts to MW004.

The COGCC does not concur that the source of the elevated benzene concentrations measured in MW004 and MW006 described in the 2017 Groundwater Monitoring Report is related to Spill/Release #440852, for reasons described above. Therefore, additional information is required to determine the source of the benzene impacts if TRC maintains the opinion that these impacts are not related to ongoing Remediation Project #18. **A revised report that includes a determination or additional discussion of the source of the benzene impacts at MW004 and MW006 shall be submitted to the COGCC no later than January 31, 2018.**

**Based on review of the 2017 Groundwater Monitoring Report (doc #2495863), the COGCC requires TRC to include MW003, MW004, MW006, and MW007 in the monitoring well network for sampling and analysis during the upcoming 2018 sampling event, which shall be completed by March 31, 2018. Additionally, TRC shall proceed to quarterly sampling of MW003, MW004, MW005, MW006, and MW007 for one calendar year following the upcoming 2018 sampling event.**

**After reviewing the contents of this message, feel free to give me a call or to schedule a sit-down meeting at the COGCC office to discuss this matter further.**

**Steven J. Arauza, P.G.**
**Environmental Protection Specialist**

COLORADO
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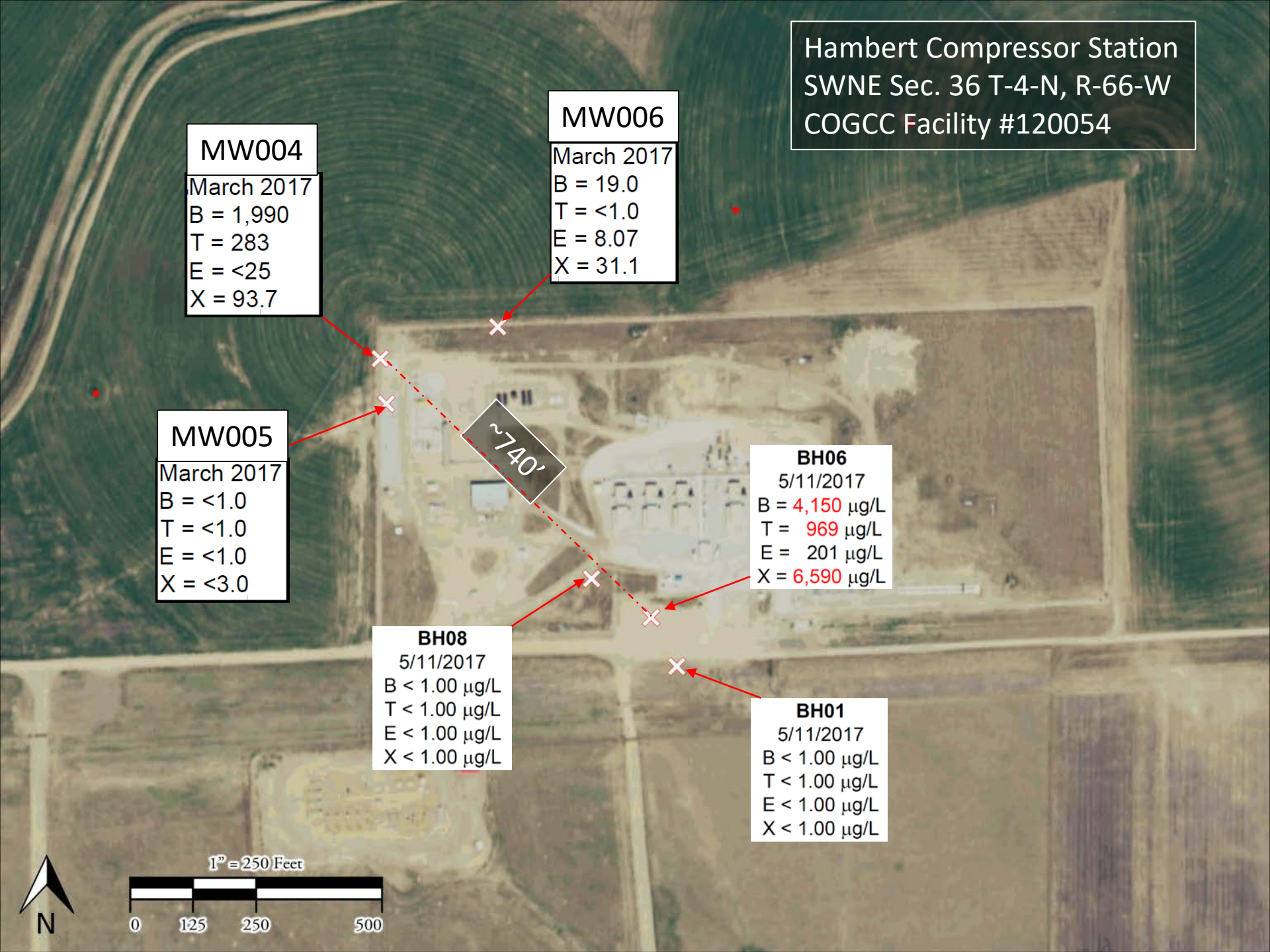
Hambert Compressor Station
SWNE Sec. 36 T-4-N, R-66-W
COGCC Facility #120054
MW004
March 2017
B = 1,990
T = 283
E = <25
X = 93.7
MW006
March 2017
B = 19.0
T = <1.0
E = 8.07
X = 31.1
MW005
March 2017
B = <1.0
T = <1.0
E = <1.0
X = <3.0
~740'
BH06
5/11/2017
B = 4,150 µg/L
T = 969 µg/L
E = 201 µg/L
X = 6,590 µg/L
BH08
5/11/2017
B < 1.00 µg/L
T < 1.00 µg/L
E < 1.00 µg/L
X < 1.00 µg/L
BH01
5/11/2017
B < 1.00 µg/L
T < 1.00 µg/L
E < 1.00 µg/L
X < 1.00 µg/L
N
1" = 250 Feet
0
125
250
500