



Fwd: Pond 10

1 message

Fischer - DNR, Alex <alex.fischer@state.co.us>
To: Darla Geimausaddle - DNR <darla.geimausaddle@state.co.us>

Fri, Jan 5, 2018 at 12:45 PM

Darla,

Please upload this email and the attached letter to Facility ID: 159504.

"COGCC Form 28 Review Comments"

Thanks
Alex

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

From: **Fischer - DNR, Alex** <alex.fischer@state.co.us>
Date: Fri, Jan 5, 2018 at 12:43 PM
Subject: Re: Pond 10
To: Lorne Prescott <lprescott@laramie-energy.com>
Cc: Craig Burger - DNR <craig.burger@state.co.us>, Stan Spencer - DNR <stan.spencer@state.co.us>

Lorne,

In review of the COGCC database, I was unable to find documents or communication to Laramie regarding Facility ID 159504, Pond 10. I did however; locate a "hard" copy of the letter with review comments from Craig Burger and I, which is attached. This copy may have been a "Draft" as there are comments/questions regarding the financial assurance, etc. and may have never been provided to Laramie. Laramie at this time has complied with the financial assurance requirements by providing a bond for \$642,120.00 (Surety ID: 20170013).

Please accept the attached letter as the COGCCs review of the Form 28 submittal for Pond 10, Facility ID: 159504. In order to wrap everything up with Pond 10, I am asking that Laramie address the questions/comments within 60-days. Let me know if this is achievable.

Thanks
Alex

On Thu, Jan 4, 2018 at 9:57 AM, Lorne Prescott <lprescott@laramie-energy.com> wrote:

Alex,

I looked at the Pond 10 stuff again,

I got two emails from you on 10/10/2016. One was for Pond G and the other was for Pond 10. I really thought I had some documents related to the Form 28 approval of Pond 10 but I can't find any, I recall that I made the assumption that the Pond 10 Form 28 (submitted by Oxy in 2014) was approved because you sent out the Bond Request.

Here's the chronology I came up with:

1. Pond 10 was originally 2 ponds: Pond 10 N and Pond 10 S, facility ids 414396 & 291946. Oxy removes them and builds one big pond the new Pond 10.
2. Oxy submits a Form 15 in an effort to take advantage of the "3 year pit" boondoggle. Doubtless someone (you?) was challenging them on it because they were scrambling to get a Form 28 submitted too.
3. Form 15 approved, doc num 400561772. Item 7 indicates leak detection will be installed and refers to 2 60-mil liners, 6/03/14. Thus, they anticipated the E&P Waste Facility criteria.

4. Form 28 for Pond 10 as one pond submitted 6/26/14. I cannot find any documentation related to final approval or COGCC review/responses.

It looks to me as if the details and supporting documents in the Form 28 submittal for Pond 10 anticipated all of the regulatory requirement you and I typically have to navigate. Such as:

- Monitoring wells installed
- 10 foot fire and buffer lanes
- Two 60 mil liners
- Drainage calculations

So, I suspect that you folks completed your review of the submittal and then needed to finalize the approval via the bonding requirements.

Let me know if you need more information from me.

Lorne

Lorne C. Prescott

Regulatory and Environmental Compliance

Laramie Energy, LLC

760 Horizon Drive Suite 101

Grand Junction CO 81506

Office: (970) 812-5311

Cell: (970) 210-6889

lprescott@laramie-energy.com

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Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



1120 Lincoln Street, Suite 801, Denver, CO 80203

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

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Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



P [303.894.2100](tel:303.894.2100) x5138 | F [303.894.2109](tel:303.894.2109)

1120 Lincoln Street, Suite 801, Denver, CO 80203

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

 **Final Facility ID 159504 Pond 10 20180105 ajf scan.pdf**
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