

# STRACHAN EXPLORATION, INC.

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Mr. Seth Odette, Prowers County

RE: Neu Compressor Station  
COGCC Facility ID 444661  
County Road 14, Prowers County, CO

January 15, 2018

Gentlemen,

Thank you for sending on your Compliance Advisory letter of January 4<sup>th</sup> regarding the NEU Compressor site.

The bottom paragraph of page 2 of 5, it is stated that “important actions related to items 1, 2 and 5 have yet to be completed”. Granted that this compliance event took place in January 2016, and Strachan Exploration, Inc. inherited this site in September 2016, I would like to make the following comments regarding **Item #1**:

On **February 5** and **February 17**, the COGCC sent notification to Berry Energy Inc. and Prowers Gas Gathering Co. LLC with action steps required and reporting compliance requested. On **February 23, 2016**, Prowers Gas Gathering had complied with the COGCC requests for site clean-up and were granted a “**satisfactory**” inspection.

It would appear from these dates that the issues were promptly taken care of in order to be granted a “satisfactory” inspection. It would also appear that the remaining containers of lubricant or oil were taken to other sites where the products could be used, and housekeeping waste disposed of as normal non-hazardous solid waste should have been.

The impacted soils that were collected by the field hands were land farmed on an impervious, black plastic membrane for aeration treatment. These soils have been tested and show “no BTEX or PAH compound concentrations greater than their respective Department standards”. These soils have **not** been disposed of, these soils have **not** been comingled with any other soils and these soils **are** available to be returned to the compressor site if that is the requested action. Safe storage pending test results was the intent for these soils, not disposal.

**It appears to me that Item #1 has been fully complied with.**

Regarding **Item #2**, excavation of site material for study and analysis was begun **April 7<sup>th</sup>, 2016**. Please refer to Braun Environmental, Inc.'s report of **April 29, 2016**.

According to the instructions from the CDPHE, at a minimum, each soil sample was to be tested for BTEX, DRO, and O&G. The samples were identified by their unique number; results blank if below lab detection (Table 1).

Sample #	Location	(mg/kg) TEPH	“ Benzene	“ Toluene	“ Ethyl-Benz	“ Xylenes	“ Oil & Grease
040716-1	west pit						
040716-2	west pit	206				.57	
040716-3	west pit	64					
040716-4	west pit						
040716-5	east pit						
040716-6	east pit						
040716-7	east pit	865					
040716-8	east pit	11					1,720
040716-9	composite	9,900		8.67	7.63	49.9	10,900
040716-10	composite	3,700		.65		5.34	28,800

According to the Braun Report, the two composite samples taken exceeded "...the Division of Oil and Public Safety base TPH standard of 500ppm, but testing of two samples (one from each pile) for **Polynuclear aromatics (PAHs)** found both samples to meet both OPS and CDPHE standards...". According to the CDPHE instruction letters of February 24 and 26 of 2016, as well as the letter of January 4, 2017, requests "...please submit the sample or samples exhibiting the highest DRO and O&G concentrations for polynuclear aromatic hydrocarbon (PAH) analysis." Braun fulfilled this requirement, and found they met CDPHE standards, and therefore "the soils are deemed to pose no risk to human health or the environment".

He concludes, "Thus, based on these results, the removed soils also meet State standards, so no further treatment is necessary from a regulatory standpoint".

**From this report, I am surmising that Item #2 has also been fully complied with.**

Previous actions resolved Items #3 and #4, leaving **Item #5** which is to submit a final report and close this Advisory.

Gentlemen, Strachan Exploration, Inc. will perform whatever additional tests the CDPHE requests to finalize this Compliance Advisory, but I feel that this case has been dutifully and fully researched and complied with.

**I agree with Mr. Braun's request that a "No Further Action Required" letter be issued by the CDPHE.**

Yours truly,

Stephen M. Strachan  
 President, Strachan Exploration, Inc.  
 Via Email

CC: Mr. Ed Smith (edwardh.smith@state.co.us)