



STATE OF
COLORADO

Doc #1727840
Remediation Project #14050
Spill/Release ID #466240

Arauz - DNR, Steven <steven.arauza@state.co.us>

Spill/Release ID 466240; REM 14050

1 message

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

Thu, Jun 4, 2020 at 12:10 PM

To: Scott Ghan <sghan@grizzlyenergyllc.com>

Cc: Steven Arauz - DNR <steven.arauza@state.co.us>, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Scott,

After reviewing and discussing this project with Steven, I concur with the assertion in his May 11 email that an additional sample of *native material* representative at the depth and vicinity of the E. Wall @ 26' is necessary to demonstrate remediation of impacted material per Rule 909.b.(5). The sample collected from the E Floor @26' on July 25, 2019 was 2,230 mg/kg for TPH combined DRO and GRO.

Grizzly is welcome to submit a complete and concise demonstration of why the soil boring sample SB 05 25-27.5' demonstrates compliance with Table 910-1 of the native material in that location via a Supplemental eForm 27 for COGCC consideration. Currently COGCC staff is of the understanding that the soil sample SB 05 25-27.5' is representative of fill material described in LTE's email from August 9, 2019.

Without quantitative documentation of compliance of native material represented by sample E. Wall @ 26' with Table 910-1, the remediation project cannot be considered resolved at a staff level (assuming compliance is demonstrated for S. Wall W. Side @ 18' and groundwater). Without an additional confirmation sample collected from 26', Grizzly would have to submit a Rule 502.b Variance request for a variance to Rule 909.b.(5) with supporting information for review by COGCC Managers and the COGCC Director.

Regards,
Alex

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Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



COLORADO
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