



LARAMIE ENERGY, LLC
760 HORIZON Drive, SUITE 101
GRAND JUNCTION, CO 81506
970-263-3600

July 7, 2020

Colorado Oil and Gas Conservation Commission
Attn: Alex Fischer
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Request for Consideration to be Given for Background Levels in Native Soils and Ground Water for Arsenic Per FAQ 31 COGCC Table 910-1 Footnote 1, and for SAR Per FAQ 32

REM #: 14692
Initial Form 19 #: 402232688
Date of Spill: 11/06/19
Spill Site: Hells Gulch 26-6 Pad, Loc #311750

Dear Alex:

The lab samples for the Hells Gulch 26-6 pad spill indicate elevated levels of Arsenic ranging from 2.39 to 5.39 mg/kg, with the background sample of Arsenic at 3.46 mg/kg.

Attached is an analytical report for a background sample collected 11/05/2009 at the Hidden Creek West Federal 14-14 pad, with the Arsenic level at 5 mg/kg. Because the Arsenic level on the Hells Gulch 26-6 pad fall below or are comparable to the background Arsenic data for the Hells Gulch 26-6 pad and the Hidden Creek West 14-14 pad, Laramie is requesting the COGCC take into consideration the background concentration of Arsenic in the native soils and is requesting relief from the Arsenic exceedances via FAQ 31 at the time of pad closure.

The Hells Gulch 26-6 pad sampling results also indicate an elevated reading for SAR. At the time of final reclamation, the Hells Gulch 26-6 pad will be buried under a minimum of three feet of backfill cover and soil that satisfies either the Table 910 level for SAR or the background level for SAR within three feet of the ground surface at the site. The pad will be reclaimed in accordance with the 1000 Series Rules. Therefore, Laramie is requesting relief from the pH exceedances via FAQ 32.

Sincerely,

Joan Proulx
Regulatory Analyst
Laramie Energy, LLC
jproulx@laramie-energy.com