



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

July 14, 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 and pH Per FAQ 32

REM #: 7258
REM Doc #: 2230283
Location: Mesa Cuttings Disposal Area (MCDA), Fac #423444

Dear Alex:

The lab samples for the Mesa Cuttings Disposal Area (MCDA) indicate elevated levels of Arsenic for all sample locations, ranging from 0.4 to 30 mg/kg.

Attached is an analytical report for background samples collected 10/21/2010 at Pond G (facility #437578), located next to the 616-21-32 pad, with Arsenic levels at ranging from 12 to 22 mg/kg. Because the Arsenic levels at the MCDA are comparable to the background samples for the Pond G area, 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.

The MCDA sampling results indicate elevated readings for SAR and pH. At the time of final reclamation, the MCDA was buried under a minimum of three feet of backfill cover and soil that satisfies either the Table 910 levels for SAR and pH or the background levels for SAR and pH within three feet of the ground surface at the site. Therefore, Laramie is requesting relief from the SAR and pH exceedances via FAQ 32.

Sincerely,

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