



LARAMIE ENERGY, LLC
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GRAND JUNCTION, CO 81506
970-263-3600

August 31, 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

Spill #: 466667
Date of Spill: 08-12-19
Spill Site: Logan Trail 28-10 Off-Loading Facility, Fac#421296

Dear Alex:

The lab samples for the Logan Trail 28-10 Off-Loading Facility (OLF) spill indicate elevated levels of Arsenic for all sampling locations.

Two background samples were collected 8/13/2019 with Arsenic readings of 5.98 mg/kg and 2.9 mg/kg. When samples were collected 8/13/2019, the Arsenic reading for one of the samples was 13.2 mg/kg which was higher than the rest of the sample reading for Arsenic. This Arsenic sample was re-run by the lab, with a result of 5.90 mg/kg.

Also attached is an analytical report (L571299) for background samples collected 4/20/2012, with Arsenic readings ranging from 0.8 mg/kg to 11.0 mg/kg. Because the current Arsenic readings are less than or comparable to previous background samples, 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 Logan Trail 28-10 OLF sampling results indicate elevated readings for SAR. At the time of final reclamation, the Logan Trail 28-10 OLF pad will be buried under a minimum of three feet of backfill cover and soil that satisfies either the Table 910 levels for SAR or the background levels 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
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