



Re: Gary Gebauer #2 Skim Pit ~ NENE S23, T1N, R53W ~ API #121-10379 ~ Facility ID#237876 ~ Inspection #664000752 ~ Remediation Project #7798

1 message

Eckman - DNR, Annie <annie.eckman@state.co.us>

Wed, Apr 30, 2014 at 3:10 PM

To: dan@dsrinc.net

Cc: John Axelson - DNR <john.axelson@state.co.us>, "EnviroScan, OGCC" <OGCC.EnviroScan@state.co.us>, John Noto - DNR <john.noto@state.co.us>

Gary Gebauer #2 Skim Pit ~ NENE S23, T1N, R53W ~ API #121-10379 ~ Facility ID#237876 ~ Inspection #664000752 ~ Remediation Project #7798

Mr. Richmond,

The COGCC approved the Form 27 you submitted for skim pit closure in on June 4, 2013, but has not received any follow up pit closure documentation as requested. Did you close the pit or is it still open? If you closed it, you need to submit the sampling data and waste disposal documents. If the pit is still open, please complete closure and provide the required documentation no later than June 30, 2014. For your reference, the approved Form 27 and Conditions of Approval are attached. Please refer to Remediation Project #7798 when submitting the required information.

Ann C Eckman, PG

Environmental Protection Specialist



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On Tue, Jun 4, 2013 at 5:00 PM, Eckman - DNR, Annie <annie.eckman@state.co.us> wrote:

Gary Gebauer #2 Skim Pit ~ NENE S23, T1N, R53W ~ API #121-10379 ~ Facility ID#237876 ~ Inspection #664000752 ~ Remediation Project #7798

COGCC has received the Form 27 Site Investigation and Remediation Plan for the above referenced location. the Form has been approved with the following conditions (COAs):

- Following the removal of any oily soils and excavation of the skim pit, a *minimum* of five

confirmation soil samples -one from the pit bottom and one from each sidewall- shall be collected;

- All soils shall be analyzed for Total Petroleum Hydrocarbons (Diesel Range Organics and Gasoline Range Organics), Benzene, Toluene, Ethylbenzene, Total Xylenes, Electrical Conductivity, pH, and Sodium Adsorption Ratio to verify compliance with Table 910-1 parameters;
- The soil sampling results must be submitted for *prior approval before lining and reuse of the pit*;
- Provide an analytical summary sheet/table comparing soil confirmation sample results to Table 910-1 Standards, accurate GPS coordinates for the pit, a sample location diagram indicating the dimensions of the pit and final excavation dimensions, as well as and the full laboratory analytical report, at minimum; and,
- Immediately submit a Form 15 pit permit.

Note that beneficial reuse of E&P waste (land farming and reuse of soil from the skim pit) **must be approved by the Director (per Rule 907a3):**

- *Reuse and recycling. To encourage and promote waste minimization, operators may propose plans for managing E&P waste through beneficial use, reuse, and recycling by **submitting a written management plan to the Director for approval on a Sundry Notice, Form 4**, if applicable. Such plans shall describe, at a minimum, the type(s) of waste, the proposed use of the waste, method of waste treatment, product quality assurance, and shall include a copy of any certification or authorization that may be required by other laws and regulations. The Director may require additional information.*

Also as noted during Inspection #664000752, you were directed to repair the leak at base of separator or remove separator, and remove or remediate stained soil around the separator and inside the shack. This soil remediation can be done as a part of this Skim Pit Remediation Project. Provide documentation of final disposition of the impacted soil.

A copy of the approved Form 27 is attached. Refer to Remediation Project #**7798** on future correspondence.

Please call John Axelson with any questions,

Annie Clements Eckman, PG for

John Axelson, PG

Environmental Protection Specialist, Northeast Region

OGCCLogo



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CC: Email correspondence REM #7798 (Amber: I entered this F27, please upload the attached images of form and COAs)

----- Forwarded message -----

From: **Dan Richmond** <Dan@dsrinc.net>

Date: Thu, May 16, 2013 at 2:43 PM

Subject: RE: Gary Gebauer #2, API #121-10379 Inspection #664000752 - Skim Pit Violations

To: "Axelson - DNR, John" <john.axelson@state.co.us>

Mr. Axelson:

I am extremely sorry that the attached Form 27 is arriving late. I had filled this out in March and believed I had sent this to you already, however since I could not find any response or evidence that this got sent to you, I must assume the responsibility for this mistake. I have therefore attached the original form with today's date hand-written in as the "sent date". That said, PADCO has addressed and completed all of the items sited on Inspection Report #664000752 with the exception of the final remediation of the skim pit. We have emptied the skim pit of water via vac truck and hauled the fluids to a licensed disposal site; we have also excavated the soil from the skim pit and stored that on-site on plastic and in a contained area. We are prepared to do the final sampling and work to prepare the pit for service upon your approval of the remediation plan.

Once again, I hope you will accept my apologies for my mistake. If you would like to visit about this via telephone, I would be glad to call you at a time convenient for you. Of course, I can be reached at the number listed below if you would prefer to call me.

Thank you for your help and understanding in this matter.

Sincerely,

Dan Richmond

Diversified Strategic Resources, Inc. for PADCO LLC

C.918.630.9912

Email: dan@dsrinc.net

From: Axelson - DNR, John [<mailto:john.axelson@state.co.us>]

Sent: Friday, February 22, 2013 3:25 PM

To: dan_ds rinc@cox.net

Cc: Kym Schure - DNR; OGCC EnviroScan - DNR; James Precup - DNR

Subject: Gary Gebauer #2, API #121-10379 Inspection #664000752 - Skim Pit Violations

Mr. Richmond,

I inspected the referenced location recently and discovered that COGCC Field Inspector, Kym Schure had also done an inspection on Feb 4th. I wanted to follow up with you regarding the unlined skim pit violations he noted. All skim pits in Colorado are required to be lined in accordance with Rule 904.a.(4). Although the operation of unlined skim pits has been a common occurrence, we have been working with many operators in Colorado to bring these pits into compliance over the last few years. The unlined earthen skim pit and corrugated culvert pipe pit can be properly closed in accordance with Rule 905 and replaced with other skimming equipment. You can also choose to remediate all of the contaminated soil surrounding the pits and properly line them in accordance with Rule 904.b. In either case, COGCC requires submittal of a Form 27 - Site Investigation and Remediation Workplan for approval prior to closure or upgrade activities in accordance with Rule 905.b.

There is currently quite a bit of oil being stored on the skim pit which is also a violation of Rule 323. To properly close/remediate the pits, all oily fluids need to be removed and properly disposed. All impacted soil needs to be removed and treated or disposed in accordance with Rule 907.e. After all of the soil is removed, confirmation samples need to be collected from the bottom of the pits and analyzed to verify compliance with Table 910-1 standards. Once all of the oily waste has been properly treated or disposed and the samples verify compliance, you can either close the pits or line them. If you choose to line them, a Form 15 pit permit will also be required.

The inspection had a deadline of March 31, 2013, to address the pit violations. Please submit the Form 27 no later than that date. We realize it might take more time to finish all of the cleanup, sampling and waste disposal, but the first step is to get the Form 27 submitted so you can proceed with the work under an approved plan. You can give me a call if you have any questions about waste management, sampling requirements or the Form 27.

Thank you,

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John Axelson, P.G.

Environmental Protection Specialist, Northeast Region

Colorado Oil & Gas Conservation Commission

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Fax: [303-637-7179](tel:303-637-7179)

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2 attachments



COGCC Scan (56) (1).pdf
157K



CONDITIONS OF APPROVAL for Rem 7798.docx
11K