



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

January 13, 2021

Colorado Oil and Gas Conservation Commission  
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 EC Per FAQ 32

Initial Form 19 #:	400738112
Spill #:	440118
Date of Spill:	11/19/14
Spill Site:	Shell 797-09A Pad, Loc #335018

Dear Alex:

The lab samples for the Shell 797-09A pad spill indicate elevated levels of Arsenic ranging from 5.58 to 6.78 mg/kg.

Attached is an analytical report for background samples collected 11/11/2011 at the Shell 797-09A pad, with the Arsenic levels ranging from 2.9 to 22 mg/kg. Because the Arsenic levels on the Shell 797-09A pad spill fall below or are comparable to the background Arsenic data, 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 Shell 797-09A pad sampling results also indicate elevated readings for SAR and EC. At the time of final reclamation, the Shell 797-09A pad will be buried under a minimum of three feet of backfill cover and soil that satisfies either the Table 910 level for SAR and EC or the background level for SAR and EC 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 SAR and EC exceedances via FAQ 32.

Sincerely,

Joan Proulx  
Regulatory Analyst  
Laramie Energy, LLC  
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