



STATE OF
COLORADO

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E. Stieber Consolidation (Document #402842304)

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Thu, Oct 28, 2021 at 11:33 AM

To: Ray Gorka <RGorka@kpk.com>, Jeff Rickard <jrickard@kpk.com>, John Axelson - DNR <john.axelson@state.co.us>, Chris Canfield - DNR <chris.canfield@state.co.us>, Jeremy Ferrin - DNR <jeremy.ferrin@state.co.us>, Greg Deranleau <greg.deranleau@state.co.us>, Kari Oakman - DNR <kari.l.brown@state.co.us>

Ray,

COGCC has returned the Form 27 for the E. Stieber Consolidation (Document #402842304) to draft due to insufficient reporting. We have also uploaded a copy of the Form and a copy of this email under remediation file. Please make the following corrections and resubmit ASAP, no later than 10 days (November 7, 2021).

- Under periodic reporting Operator has indicated "Other: Bi-weekly sampling results" however no results or any other information has been provided.
- Proposed start date of remediation indicates 12/31/2021. Due to the proximity of free product adjacent to sensitive receptors (including a shallow domestic water well) and in accordance with Rules 901.a and 913.d.(1) Operator shall initiate Remedial excavation as soon as crop access is allowed, per Operator comments this is 11/1/2021.
- Due to observed free product in MW-3 and MW-4 emergency approval for additional wells was granted via email by John Axelson on 9/16/2021 (Document #1585420). COGCC has not received an update on progress for this work.
- Operator is conducting remedial vacuuming of free product and groundwater daily. No analytical, gauging of depth to water, measurements of free product, disposal documentation, or analytical have been provided.
- No logs or construction diagrams for remedial wells or monitoring wells have been provided.
- Operator has not provided recent analytical samples from bi-weekly sampling of DWR Permit 215661. Per COA on initial Form 27: "A Form 27 shall be provided to the COGCC within 5 business days of receipt of analytical."
- A groundwater contour map has not been provided. COGCC cannot determine the threat to the domestic water well or other sensitive resources.
- Operator has not provided analytical results from soils collected during monitoring well installation.
- The following COA's are outstanding from the initial Form 27:
 - On the next Form 27 Operator shall provide a construction log of the stand pipe including Total Depth, Slotted Interval, Diameter location within the excavation, and filter pack. Operator shall also provide details on how the stand pipe is capped and secured at the surface. Operator will submit a minimum of one soil sample for laboratory analysis of Table 915- 1 Parameters from each soil boring advanced during monitoring well installation. The sample collected will be from the interval(s) displaying the highest degree of impacts.
 - Operator shall perform a complete soil and groundwater characterization at the site to determine groundwater gradient/flow direction and the full extent of impacts. In addition to an up-gradient, a down-gradient, two cross gradient, and a source well, monitoring wells shall be installed at the following locations:
 - Between release area and the domestic water well (DWR Permit 215661; as mapped in COGIS)
 - On the north side of CR 8
 - In accordance with Rule 914, if impacts are observed during monitoring well installation a step out monitoring well(s) will be installed to define the horizontal extent of impacts to soil and groundwater. More than one well may be required to obtain a point of compliance. The monitoring well(s) shall be installed within 14 days. Operator will survey in the monitoring wells and calculate and display the groundwater elevation contours bi-weekly with sampling of domestic water well.
 - Operator shall provide boring logs in accordance with standard environmental practices. This includes at a minimum; lithology description, USCS classifications, PID readings, sample collection depths, depth to water, and well construction.
 - Operator shall track the volume of fluids recovered daily and provide quantities on the next supplemental Form 27.

Please feel free to reach out if you have any questions.

Nikki Graber, P.G.
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COLORADO
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