



605-2

Location ID: 323998

REM 8898

RE: Pathway to Groundwater Assessment

Document prepared for DOC 403279176 (Form 27) COA; *Submit a comprehensive project summary on a Supplemental Form 27 with an assessment of potential pathways to groundwater. Include site diagrams depicting soil and surface water sampling locations along with analytical summary tables for soil and surface water samples that compare all samples that have been collected to Table 915-1, using the Protection of Groundwater Soil Screening Level cleanup concentrations for soil samples.*

Documentation presented is either already submitted to COGCC under REM 8898 but has been adjusted to current rules and submitted with this report and/or as an attachment to this supplemental form 27. Evidence of water impacts not identified in due diligence during the previous sampling events. No new data has been collected for site due to infrastructure that is in place that pose safety issues with drilling and/or source removal.

- Pad Elevation 8170'
- North of Pad Drainage 8170'
- East of Pad Drainage 8163'
- Pond 8160'
- South of Pond Drainage 8144'

Total excavation was 10' (West wall) below pad surface putting it at 8160', east of pad drainage is 8163' and pond is 8160'. During excavation, water was never encountered or noted during remediation activities. Pond was sampled for 4 quarters with no impacts identified. Downstream (South) was also sampled for 4 quarters with no impacts identified. Downstream sampling location is ~ 500' south of remediation area.

If remediation/impact area was likely to have a pathway to water, sampling events would have likely identified impacts. With the excavation being lower than drainage immediately east of site, it would be assumed that static groundwater would be near the 8160' – 8161' level in past experiences. Due to a total depth of excavation reaching 10' below grade (8160') and no impacts identified in water sampling events, it is apparent that impacts did not directly affect the water within the area.

Soil data summary is attached to this form 27 that has been updated to 915. West wall below equipment and hand augered borings west of source area were applied by a 6% mixture of Microblaze prior to backfilling. Due to the bottom sample of excavation clearing at 9', with no hydrocarbons present or above 915 on clearance sample, it is assumed that Laramie will obtain clearance below equipment near 11' due to the microblaze application and in-situ that has occurred. Pictures attached do not indicate visible stains and/or impacts from the original excavation (wet looking spots in walls of excavation confirmed with prior contractor that was the microblaze application).



Laramie Energy, LLC  
760 Horizon Drive  
Grand Junction, CO 81506

Laramie is requesting consideration of leaving project under RSSL instead of GWSSL with supporting documentation submitted in this form 27.

Site is scheduled for P&A in late 2023, and after equipment removal, source area will be able to be safely removed and delineated. During delineation, if groundwater is encountered, samples will be collected and analyzed for table 915, where as the project at that time could be subject to GWSSL if impacts are noted.

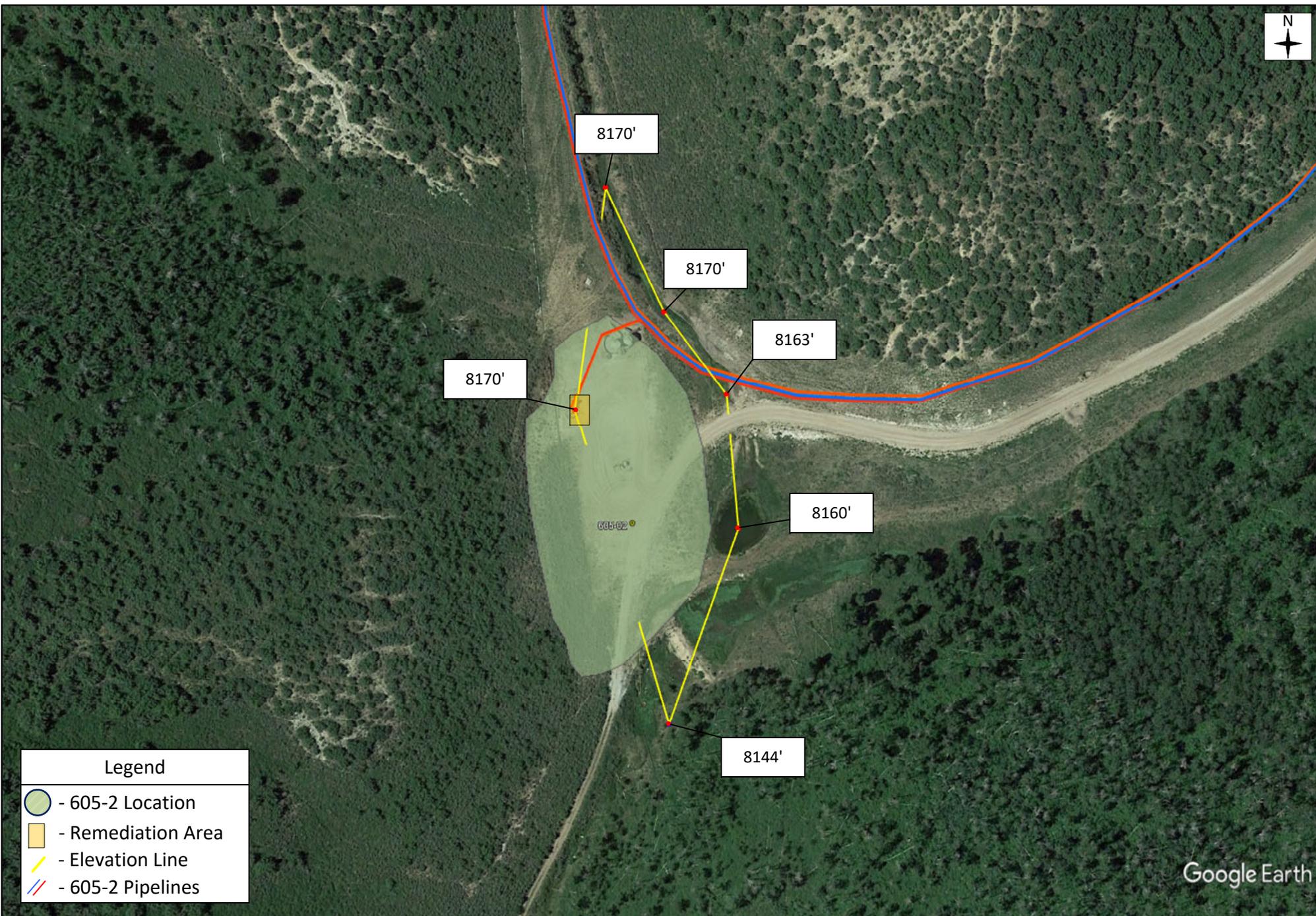
DOC 400971845 (Form 4) approved 1/19/2016; comments that water quality monitoring has not indicated any impact from spill. With past experience and location of release, if impacts would have been detected it would have been early on and identified with sample results. Initial reporting declared ~13.4 bbls of fluid lost and no free fluids present during excavation with an estimation of nothing leaving the pad boundary.

It is possible that this project could remain under GWSSL until delineation is completed (If supporting document/assessment of potential pathways is denied). If supporting clearance data is obtained after delineation and no potential pathways to water are presented, during that time Laramie will request project to remain under RSSL and closure/nfa.

With documentation presented in this report and findings; we do not believe there was a pathway or a potential pathway to groundwater at this site.

Sincerely,

**Laramie Energy, LLC**  
Matt Kasten  
*Environmental Coordinator*



Legend	
	- 605-2 Location
	- Remediation Area
	- Elevation Line
	- 605-2 Pipelines



**Laramie Energy**  
 760 Horizon Drive, Suite 101  
 Grand Junction, Co 81506

Elevation Site Diagram  
 605-2  
 Location IDs: 323998  
 Garfield County || NWSE, Sec. 5, T6S, R97W, 6<sup>th</sup>

RE: 605-2 REM 8898	
Survey Date: NA	Date Drawn: 02/09/2023
Drawn By: MK	Scale: None









