

Nov 3, 1995

Mr. Doug Meyer
10894 Quail Road
Longmont, CO 80501

RE: Montgomery #1-21 Well, SE SE Section 21, T1N, R69W
Remediation Requirements for Closure of Concrete Water Pit and Cleanup of
Hydrocarbon Contamination in Soil and Groundwater

Dear Mr. Meyer:

The following letter includes a summary of the COGCC environmental staff site investigation and recommendations for cleanup at the tank battery.

INVESTIGATION SUMMARY:

I inspected the site on Monday, 10/23/95. In the tank battery area, the concrete tank used for holding produced water had been exposed by excavation to a depth of about 4 feet on all sides of the tank. There was groundwater in the excavation at a depth of about 3 feet below ground surface, below the south pipe inlet.

I observed staining in the soil on the walls of the excavation, indicating migration of released or spill oil or condensate. Some of the staining was near the surface, and some was near the water level. It appears that some of the contamination could be attributed to surface oil spills.

I sampled the groundwater, to determine the concentration of hydrocarbon in the groundwater in the excavation around the concrete tank. The results (attached) indicate elevated levels of hydrocarbons, exceeding the WQCC groundwater standard for Benzene.

REQUIRED REMEDIATION:

A. Remove the source and estimate extent of contamination:

1. Remove the concrete tank and associated buried piping.
2. Remove the oily or contaminated soil by continuing excavation.
3. Haul contaminated soils to appropriate treatment or disposal site.
4. When tank and soil removed, take composite sample of remaining pit wall and bottom, and analyze for TPH.



02159059

5. Take sample of groundwater that fills the clean pit after excavating and analyze for BTEX.
6. Take sample from two nearest water wells and analyze for BTEX.
7. Submit data to COGCC, including description of cleanup activities, analytical results, and evaluation of extent of contamination in soils and groundwater to COGCC for review and determination of next steps/further action. The COGCC environmental staff will review the progress, the potential for future impact, and determine the next action to be taken by the operator.

RECOMMENDED CLOSURE PLAN:

Based on data received to date, the COGCC recommends that a monitoring program be implemented as a cost-effective approach to the groundwater contamination, unless future data indicates another, more aggressive approach is required. From the data it appears the groundwater has elevated concentrations of hydrocarbons, which may be decreased through intrinsic remediation. Monitoring the concentrations will allow us to see whether the remediation is effective, and whether further investigation and remediation may be necessary.

Monitoring of BTEX concentrations should be performed on a quarterly basis until the data is no longer required. The sampling events should be done in February, May, August and November, with samples taken from each of the two water wells, and in the tank battery area.

Contact me at x112 if you need further information. Thank you for your cooperation.

Sincerely,



Robin Reade

cc: Dave Shelton, Area Engineer
Tricia Beaver, Environmental Affairs Manager
Jim Smith, Surface Owner and Tenant