

Discussion for using residential screening limits:

A nearby Water well in the adjacent section as Timbro Ranch 1-3-9-59 location has static water level of 38 feet. Nearest RBU is over 2 miles away. When the well was drilled the geologic log showed a Brule layer at 1-22 feet, sandy clay at 22-26 feet, claystone at 26-52 feet, clay at 52-100 feet. Groundwater is not near the surface in this area. The water well construction and test report is attached to the Form 27.

There is no spill associated with this remediation project. It is for decommissioning a facility. There is no evidence of impacted soils from oil and gas operations. This project most closely reflects Example 4 of COGCC OPERATOR GUIDANCE RULE 915.a - SOIL CONCENTRATIONS – DETERMINATION OF PATHWAY TO GROUNDWATER. Because of the observations and data gathered for this spill Verdad requests the application of the Residential SSLs rather than the Protection of Groundwater SSLs, since there is no likely pathway to Groundwater for this spill.