



STATE OF
COLORADO

Spill/Release ID 48690
REM 34712
REM 28244
REM 28246
Location ID 312756
Document 2358295

Fwd: POC Illes Dome Status

1 message

Spill/Release ID: 486930;
REM 34712;
REM 28244;
REM 28246; and
Location ID: 312756.

Thanks
Alex

----- Forwarded message -----

From: **Fischer - DNR, Alex** <alex.fischer@state.co.us>

Date: Fri, Aug 2, 2024 at 7:19 AM

Subject: Re: POC Illes Dome Status

To: Rebecca Podio <rpodio@gmail.com>

Cc: Kris Neidel - DNR <kris.neidel@state.co.us>, Megan Chamard - DNR <megan.chamard@state.co.us>

My apologies if I did not attach the CDPHE/WQCD Dredge and Fill Policy. See attached.

Alex

On Thu, Aug 1, 2024 at 11:52 AM Fischer - DNR, Alex <alex.fischer@state.co.us> wrote:

Rebecca,

It was nice to briefly meet you at the Ilse Dome Location Wednesday, July 24, 2024 and thank you for your email this morning regarding notification to ECMC that POC-I LLC will have a dedicated 3-4 man crew in the Ilse Dome Field starting Monday, August 5, 2024 removing staining in the drainage and doing general cleanup in the field. I wanted to bring to your attention the attached "Dredge and Fill" Policy (Implementation Policy Number: CW-17. This policy from the Colorado Department of Public Health and Environment Water Quality Control Division (CDPHE/WQCD) went into effect July 6, 2023 and must be followed prior to any additional remediation efforts (excavation or removal of impacted soil) from the gulch. *Please contact the CDPHE/WQCD for guidance.* That said, the policy does NOT preclude the Operator from removal of the free standing hydrocarbons (HC) observed as a sheen on the surface water at the culverts' outfall noted on July 24, 2024, when you are on Location, nor does it preclude the Operator from completing additional Site Investigations and Remediation for the following:

Recent Spill/Release ID: 486930

- Initial/Supplemental F19 (Doc # 03810933) states, " The spill area has been thoroughly cleaned up." Operator has not provided documentation that any impacts have been remediated to Table 915-1 Cleanup Concentrations.

The following Comment was placed on the I/S F19: COA was placed on that I/S F19: *COGCC staff removed the request for closure in this form 19 to allow for approval. Further action is required, see additional COA's for required action.*

The following COA was placed on the I/S F19: *Assess the nature and extent of contamination with confirmation of surface water and soil samples. Delineate the horizontal and vertical extent of the impacted area and remediate impacts to Table 915-1. Provide documentation in either a Supplemental Form 19 if cleaned up within 90 days. Spills*

open longer than 90 days require a Form 27. Documentation must include a figure showing the spill area with sample locations plus laboratory results.

- The Operator should be actively remediating impacts as opposed to waiting until August 6, 2024 to submit the Initial F27 for this Spill/Release.
- The Operator is in violation of Rules 912.a.(2) and 913 when they stated, " The spill area has been thoroughly cleaned up." I am sure that there are other Rule violations related to this Spill/Release.
- Spill/Release ID: 486930 remains open.

REM 34712 (Cement Sump Structure)

- Operator shall comply with COAs on Initial F27, Doc # 403725429 and Supplemental F27 Doc # 403807646. This includes quarterly reporting on a Form 27 per Rule 913.e.
- F-27 Doc #403853617 was DENIED for the reasons stated on the form (See Doc # 403853617)

REM 28244 (Remediation of the three pits)

- Operator shall comply with COAs on Initial F27, Doc # 403272607 and Supplemental F27 Doc # 403723687. This includes quarterly reporting on a Form 27 per Rule 913.e.

REM 28246 (Remediation of the Gulch)

- Operator shall comply with COAs on Supplemental F27 Doc # 403807740 . This includes quarterly reporting on a Form 27 per Rule 913.e
- Operator will provide evidence that they have complied with any Relevant Local Government, State Government, and Federal Government policies and regulations and construction or operation requirements.

Regards,
Alex

--

Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



COLORADO
Energy & Carbon Management
Commission
Department of Natural Resources

C 303.501.3900

1120 Lincoln Street, Suite 801, Denver, CO 80203

| alex.fischer@state.co.us www.colorado.gov/ecmc

--

Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



COLORADO
Energy & Carbon Management
Commission
Department of Natural Resources

C [303.501.3900](tel:303.501.3900)

1120 Lincoln Street, Suite 801, Denver, CO 80203

| alex.fischer@state.co.us | www.colorado.gov/ecmc

--

Alex Fischer, P.G.

Environmental Supervisor, Western Colorado



COLORADO
Energy & Carbon Management
Commission
Department of Natural Resources

C [303.501.3900](tel:303.501.3900)

1120 Lincoln Street, Suite 801, Denver, CO 80203

| alex.fischer@state.co.us | www.colorado.gov/ecmc



CW-17 (3).pdf
290K