



STATE OF  
COLORADO

Allison - DNR, Rick <rick.allison@state.co.us>

## RE: Updated invitation: ASP Draft discussion @ Mon Apr 14, 2025 1:15pm - 2:15pm (MDT) (cgulde@chevron.com)

Allison - DNR, Rick <rick.allison@state.co.us>

Thu, Apr 17, 2025 at 9:26 AM

To: "Gulde, Cynthia" <CGulde@chevron.com>

Cc: "Eggert, Derek" <DHYG@chevron.com>, Abdul Elnajdi - DNR <abdul.elnajdi@state.co.us>, Alex Fischer - DNR <alex.fischer@state.co.us>, Heather Young - CDPHE <heather.young@state.co.us>, "bowker.taylor@epa.gov" <bowker.taylor@epa.gov>, Kyle Lawrence <kylelawrence@cteh.com>, "Dhieux, Joyel" <Dhieux.Joyel@epa.gov>, Kyle Waggoner - DNR <kyle.waggoner@state.co.us>, Melynda May - DNR <melynda.may@state.co.us>, Kelly Morgan - CDPHE <kelly.morgan@state.co.us>, Nathan Moore - CDPHE <nathan.moore@state.co.us>

Hi Cynthia

ECMC conditionally approves the attached ESAP dated 4/17/2025. Please see the following conditions. The plan does not need to be revised and approved immediately; Chevron may simply implement the plan and adhere to the following:

Condition 1: Pursuant to WQCC Regulation 31 dissolved metals in surface water samples should include: aluminum, arsenic, cadmium, chromium II and VI, copper, lead, manganese, nickel, selenium, silver, uranium, zinc

Condition 2: Include the two following additional sample locations at CPW request:

- W002.5 Willow Creek upstream of the confluence with Lone Tree Creek (40.48086, -104.59554)
- W004.5 Willow Creek at Bishop Well (40.501334, -104.588922)

Comments: Table 2, anions are not required in soil. Uranium is not necessary is a radionuclide and should be analyzed as a metal.

Tables 4 and 5 can be renamed Tables 3 and 4 respectively.

If there are logistical or site issues with the requested additional sampling locations please work with Colorado Parks and Wildlife, and Kyle Waggoner and Abdul Elnajdi with ECMC, in the field to address finding a suitable location.

Thank you for working through this document with us.

Rick

Richard Allison, P.G.

Northeast Area EPS and Groundwater Investigation Lead

My pronouns: he/him/his



**COLORADO**  
Energy & Carbon Management  
Commission  
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On Thu, Apr 17, 2025 at 6:38 AM Gulde, Cynthia <CGulde@chevron.com> wrote:

Good morning, attached is the revised DRAFT ESAP. Below are responses to the comments received yesterday. If there are no other comments I would like to submit to the IC for approval by 10:00 today. Thanks again for your assistance in working through this plan.

Cindy

Sections 6 & 7 conflate remediation and reclamation plans with sampling. Those sections should be removed and developed under separate cover and incorporated into a Form 27 Site Investigation and Remediation Workplan.

*Response: Acknowledged. Sections 6 and 7 were removed from the plan. As a result, the plan now contains 12 sections instead of 14.*

**1. Table 1:** Please use clean water act methods as previously requested by CDPHE-WQCD as outlined below. For analytes without CWA methods, the stated methods are acceptable. ECMC and WQCD have agreed to use 8015 for TPH as opposed to ASTM D7678.

*Response: The table has been updated as requested citing method 524.2 and 525.3 for VOCs and SVOCs, respectively.*

Also note, in all this back and forth, alkalinity got dropped from that screenshot table. Please analyze alkalinity -total, carbonate, bicarbonate - in all surface water samples by 40 CFR Part 136 method 310.2

*Response: Noted, Alkalinity - total, carbonate, bicarbonate has been added to the table.*

**2. Table 1:** Uranium is still not listed for total/dissolved metals. Also, Uranium may be removed from radchem per CDPHE and proceed with Ra-226,228 only. My apologies for any confusion over uranium.

*Response: Uranium has been added to the list of metals noted in footnote #1 on Table 1.*

**3. Table 2:** Hot water soluble or sorbitol extract for boron is required in soil samples.

*Response: Acknowledged. Footnote #3 includes Boron as noted in the highlighted text “<sup>3</sup> pH, EC, and SAR will be done with the saturated paste method, and boron will be done using the hot water soluble or sorbitol extract, following the Soil, Plant and Water Reference Methods for the Western Region as referenced in Rule 901.b.(3)I. This document is attached as Attachment C.*

**4. Table 2:** pH, EC, and SAR by saturated paste methods should follow the Soil, Plant and Water Methods for the Western Region as referenced in Rule 901.b.(3)I. Hot water soluble/sorbitol boron should also follow these Western Region methods.

*Response: Acknowledged. Footnote #3 includes Boron as noted in the highlighted text “<sup>3</sup> pH, EC, and SAR will be done with the saturated paste method, and boron will be done using the hot water soluble or sorbitol extract, following the Soil, Plant and Water Reference Methods for the Western Region as referenced in Rule 901.b.(3)I. This document is attached as Attachment C.*

**4. Section 6.0** As opposed to trying to further revise with the correct analytes, this should be removed completely and handled with a reclamation plan under separate cover.

*Response: Acknowledged. Section 6.0 Backfill Soil Sampling has been removed from the plan. A reclamation plan will be developed under a separate cover.*

**5. Section 7.0** Screening levels are still discussed incorrectly. Please remove Section 7.0. Cleanup targets should be handled under separate cover of a Form 27.

*Response: Acknowledged. Section 7.0 Cleanup Targets has been removed from the plan and will be developed under a separate cover.*

*A statement has been added to the Introduction section that acknowledged the Form 19s process "Any modification and/or future revisions will be managed with operator alignment with stakeholders utilizing the Form 19s process."*

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**From:** Allison - DNR, Rick <[rick.allison@state.co.us](mailto:rick.allison@state.co.us)>

**Sent:** Wednesday, April 16, 2025 12:19 PM

**To:** Gulde, Cynthia <[CGulde@chevron.com](mailto:CGulde@chevron.com)>; Eggert, Derek <[DHYG@chevron.com](mailto:DHYG@chevron.com)>

**Cc:** Abdul Elnajdi - DNR <[abdul.elnajdi@state.co.us](mailto:abdul.elnajdi@state.co.us)>; Alex Fischer - DNR <[alex.fischer@state.co.us](mailto:alex.fischer@state.co.us)>; Heather Young - CDPHE <[heather.young@state.co.us](mailto:heather.young@state.co.us)>; bowker.taylor@epa.gov; Kyle Lawrence <[kylelawrence@cteh.com](mailto:kylelawrence@cteh.com)>; Dhieux, Joyel <[Dhieux.Joyel@epa.gov](mailto:Dhieux.Joyel@epa.gov)>; Kyle Waggoner - DNR <[kyle.waggoner@state.co.us](mailto:kyle.waggoner@state.co.us)>

**Subject:** **[\*\*EXTERNAL\*\*]** Re: Updated invitation: ASP Draft discussion @ Mon Apr 14, 2025 1:15pm - 2:15pm (MDT) ([cgulde@chevron.com](mailto:cgulde@chevron.com))

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Ensure the email and contents are expected. If there are concerns, please submit suspicious messages to the Cyber Intelligence Center using the Report Phishing button.

Hi Derek,

As you and I discussed, please see my comments on the latest SAP below. The latest SAP is attached for your reference.

Sections 6 & 7 conflate remediation and reclamation plans with sampling. Those sections should be removed and developed under separate cover and incorporated into a Form 27 Site Investigation and Remediation Workplan. The surface water and soil SAP still requires the following revisions:

**1. Table 1:** Please use clean water act methods as previously requested by CDPHE-WQCD as outlined below. For analytes without CWA methods, the stated methods are acceptable. ECMC and WQCD have agreed to use 8015 for TPH as opposed to ASTM D7678.

|                  |                |       |
|------------------|----------------|-------|
| VOCs             |                | 524.2 |
| SVOCs            |                | 525.3 |
| TPH C6-C10       | 8015D          |       |
| TPH C10-C36      | 8015C          |       |
| Metals           | 200.7/200.8    |       |
| Dissolved Metals | 200.7/200.8    |       |
| Total Hardness   |                | 130.1 |
| TDS              | SM 2540C       |       |
| TSS              | SM 2540D       |       |
| Anions           |                | 300.1 |
| Phosphorus       |                | 365.4 |
| TKN              |                | 351.2 |
| Ammonia          |                | 350.1 |
| N as NO3,NO2     |                | 353.2 |
| TOC              | SM 5310 B      |       |
| pH               |                | 150.2 |
| Ra-226,228       |                | 903.1 |
| Uranium          |                | 908   |
| MBAS             | SM 5540 C-2011 |       |

**2. Table 1:** Uranium is still not listed for total/dissolved metals. Also, Uranium may be removed from radchem per CDPHE and proceed with Ra-226,228 only. My apologies for any confusion over uranium.

**3. Table 2:** Hot water soluble or sorbitol extract for boron is required in soil samples.

**4. Table 2:** pH, EC, and SAR by saturated paste methods should follow the Soil, Plant and Water Methods for the Western Region as referenced in Rule 901.b.(3)l. Hot water soluble/sorbitol boron should also follow these Western Region methods.

**4. Section 6.0** As opposed to trying to further revise with the correct analytes, this should be removed completely and handled with a reclamation plan under separate cover.

**5. Section 7.0** Screening levels are still discussed incorrectly. Please remove Section 7.0. Cleanup targets should be handled under separate cover of a Form 27.

Rick

Richard Allison, P.G.  
Northeast Area EPS and Groundwater Investigation Lead  
My pronouns: he/him/his



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On Tue, Apr 15, 2025 at 3:40 PM Gulde, Cynthia <CGulde@chevron.com> wrote:

Hello, Kyle suggested I resend both the response to comments and the final draft so they are together. In addition, please note my acknowledgment below regarding the analyte list and submittal of Form 27. Please let me know if you have any other questions or comments.

Thanks

Cindy

**Cynthia Gulde, Ph.D.**

Sr. Regulatory Affairs Advisor  
Chevron Environmental Management Company

Mobile: 832-586-5984

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**From:** Gulde, Cynthia

**Sent:** Tuesday, April 15, 2025 3:04 PM

**To:** Allison - DNR, Rick <rick.allison@state.co.us>

**Cc:** Abdul Elnajdi - DNR <abdul.elnajdi@state.co.us>; Alex Fischer - DNR <alex.fischer@state.co.us>; Heather Young - CDPHE <heather.young@state.co.us>; bowker.taylor@epa.gov; Kyle Lawrence <kylelawrence@cteh.com>; Dhieux, Joyel <Dhieux.Joyel@epa.gov>

**Subject:** RE: [\*\*EXTERNAL\*\*] Re: Updated invitation: ASP Draft discussion @ Mon Apr 14, 2025 1:15pm - 2:15pm (MDT) (cgulde@chevron.com)

Hello, thank you for the comments. Please see the attached plan that addresses the comments below. We understand that this will be the required analyte list until such time that a reduced list is reviewed and approved by the agencies and that request must be formally made using Form 27.

After you have a chance to review, please provide confirmation that this plan is approved.

Thank you for your time and assistance as we work through this process,

Cindy

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**From:** Allison - DNR, Rick <rick.allison@state.co.us>

**Sent:** Tuesday, April 15, 2025 12:30 PM

**To:** Gulde, Cynthia <CGulde@chevron.com>

**Cc:** Abdul Elnajdi - DNR <abdul.elnajdi@state.co.us>; Alex Fischer - DNR <alex.fischer@state.co.us>; Heather Young - CDPHE <heather.young@state.co.us>; bowker.taylor@epa.gov; Kyle Lawrence <kylelawrence@cteh.com>; Dhieux, Joyel <Dhieux.Joyel@epa.gov>

**Subject: \*\*EXTERNAL\*\* Re: Updated invitation: ASP Draft discussion @ Mon Apr 14, 2025 1:15pm - 2:15pm (MDT) ([cgulde@chevron.com](mailto:cgulde@chevron.com))**

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Hi Cynthia

Please see the following comments regarding the latest ESAP:

**Section 4.2 and 5.1**

ECMC will not consider requests for reduced analyte suites until a source/waste characterization sample has been collected and results submitted to ECMC. In addition, at least one or more rounds of sample analytical results from surface water and soil samples must be submitted to ECMC for any consideration of a reduced analyte suite. ECMC will review the results in consultation with WQCD, CPW and EPA. This request and approval process may only be made formally on a Form 27 Site Investigation and Remediation Workplan.

**On Table 1:**

1. I do not see ammonia. Please include ammonia
2. Please include Uranium in metals by method 6010/6020 analysis in addition to the radiological activity. I apologize if I misheard the list during our call. Yes we want Uranium by both methods.
3. I do not see pH on the table as a lab analysis
4. Analyses should be performed pursuant to 40 CFR Part 136 methods

**On Table 2:**

1. I do not see hot water soluble/sorbitol extractable boron. Revise Table 2 to include hot water soluble boron.

**On Table 3:**

Most of the requested agronomic parameters have not been included. Backfill soil should be analyzed for those parameters outlined in our comments. That document is reattached. See the comments regarding Section 6.0 on pages 2 and 3.

**Section 7.0:**

Recognize that the EPA Regional Screening Levels will be applied to those analytes detected in soil and not listed in ECMC Table 915-1. WQCC Regulation 31 will apply to surface water samples.

Thank you,

Rick

Richard Allison, P.G.

Northeast Area EPS and Groundwater Investigation Lead

My pronouns: he/him/his



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On Mon, Apr 14, 2025 at 3:44 PM Gulde, Cynthia <[CGulde@chevron.com](mailto:CGulde@chevron.com)> wrote:

Hello, attached is the revised ESAP. Please review and let me know if you have any edits, or if you approve. Thanks again for meeting today to refine the analyte list for soil and water.

Thanks

Cindy

-----Original Appointment-----

**From:** Abdul Elnajdi - DNR <[abdul.elnajdi@state.co.us](mailto:abdul.elnajdi@state.co.us)>

**Sent:** Monday, April 14, 2025 12:55 PM

**To:** Abdul Elnajdi - DNR; Alex Fischer - DNR; Heather Young - CDPHE; Rick Allison - DNR; Gulde, Cynthia; [bowker.taylor@epa.gov](mailto:bowker.taylor@epa.gov)

**Subject:** [**\*\*EXTERNAL\*\***] Updated invitation: ASP Draft discussion @ Mon Apr 14, 2025 1:15pm - 2:15pm (MDT) ([cgulde@chevron.com](mailto:cgulde@chevron.com))

**When:** Monday, April 14, 2025 1:15 PM-2:15 PM America/Denver.

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**This event has been updated**

**Changed:** time

CHANGED

When

1:15pm – 2:15pm (Mountain Time - Denver)

~~1pm – 2pm (Mountain Time - Denver)~~

Join with Google Meet

Meeting link

meet.google.com/ucp-bxdz-aqr

Guests

- organizer Abdul Elnajdi - DNR

Alex Fischer - DNR

Heather Young - CDPHE

Rick Allison - DNR

cgulde@chevron.com

bowker.taylor@epa.gov

Join by phone

+1 413-752-0676(US)

PIN: 986247551

More phone numbers

View all guest info

cgulde@chevron.com for Reply



Maybe

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Yes

More options

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