

Discussion for using residential screening limits on Vicki 21-24 (Spill ID #489841):

A nearby well adjacent to the location had a static water level of 350 feet (permit #231842). When the well was drilled borings installed on the site indicate the pad is underlain by “clay” to depths ranging from 0 to 50 ft. below ground surface (BGS). Subsurface soil consisted of a “shale” from 50 ft. BGS to 260 ft. BGS then a 1 ft. layer of “Rock” at 261 ft. BGS. Groundwater is not near the surface in this area with a rock layer between ground surface and the static water level.

All samples confirm spill cleanup. There is no evidence of impacted soil from oil and gas operations yet Barium in 1 sample is over the Protection of Groundwater Screening Level by 2.25 mg/kg (considering background levels) and under the Residential SSL by 14,729 mg/kg. 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 cleanup, Verdad requests the application of the Residential SSLs rather than the Protection of Groundwater SSLs, for the analyte barium, on the “floor” sample, since the pathway to Groundwater is over 350 feet for this project.