



**Eric S. Page**  
Project Manager

**Upstream Business Unit**  
Chevron Environmental  
Management Company  
1400 Smith Street  
Room 40029  
Houston, Texas 77002  
Tel 713 372 1022  
epage@chevron.com

April 23, 2009

Mr. David Andrews  
Colorado Oil and Gas Conservation Commission  
707 Wapiti Court  
Suite 204  
Rifle, CO 81650

**Re: Second UIC Permitting Update for Historic Recovery Trenches  
Wilson Creek Site  
Rio Blanco County, Colorado**

Dear David,

This letter responds to the COGCC's request for supplemental information regarding permit approvals for disposal of fluids recovered from three remedial extraction trenches Chevron operated at the Chevron Wilson Creek site located in Meeker, Colorado (Site).

By way of background, on April 21, 1995, Chevron's predecessor, TEPI, discovered surface seepage of oily liquid near its Wilson Creek operation. The COGCC and EPA National Response Center were verbally notified of the discovery on that date, with follow-up written notification on April 25, 1995. The results of the initial investigation were submitted to the Commission on December 18, 1995 in a report prepared by Grant Environmental, Inc. That report proposed a remedial plan using interceptor trenches to recover hydrocarbon impacted water which would be pumped to TEPI's existing water disposal facilities. Thereafter, on January 9, 1996, the Commission met with representatives from TEPI and Grant to discuss Grant's report. At that meeting, the Commission requested additional information which TEPI submitted on January 31, 1996.

Status reports filed with the Commission on June 13, 1996, April 27, 2000 and July 24, 2000 also reported such disposal, as did annual reports filed with the Commission for 2003, 2004 and 2005.

In our recent meetings you have inquired as to specific permit approval for disposal of the water recovered from the trenches. By letter dated May 5, 2002, Larson & Associates, Inc., the contractor then engaged by TEPI to proceed with this remediation, submitted an updated remedial work plan for Commission approval. With regard to water recovered from the interceptor trenches, the proposed work plan stated, "The water will be disposed via injection wells at the Wilson Creek field." By letter dated May 9, 2002, the Commission approved this work plan. Based on that approval, Chevron continued with described water disposal.

David Andrews  
Colorado Oil and Gas Conservation Commission  
April 23, 2009  
Page 2

As further mitigation, we note that the historical concentrations of hydrocarbons observed in the interceptor trenches are significantly lower than typical concentrations of fluids permitted for injection into the wells. Finally, Chevron ceased operation of all three recovery trenches in 2007.

Based on this chronology, it appears that while the Commission has been kept informed of disposal activity at this site and, to some extent, has approved the disposal activity that was conducted, specific permit authority for such disposal was not obtained.

I hope that this letter provides the information you requested. We welcome the opportunity to meet with you to discuss any further questions you may have. Should you have any questions or wish to discuss this matter further, please contact me at (713) 372-1022 or [EPAGE@chevron.com](mailto:EPAGE@chevron.com).

Yours truly,

A handwritten signature in black ink, appearing to read 'E. Page', with a stylized flourish at the end.

Eric S. Page  
Project Manager

cc: Chris Canfield, COGCC  
Kevin King, COGCC  
Luke Allred, Chevron  
Seth Maher, Stantec  
Scott Olivier, Stantec

**Andrews, David**

---

**From:** Page, Eric S [EPage@chevron.com]  
**Sent:** Thursday, April 23, 2009 1:06 PM  
**To:** Andrews, David  
**Cc:** King, Kevin; Canfield, Chris; Allred, Luke C. (LUCI); Olivier, Scott; Maher, Seth; Loftus, Thomas A  
**Subject:** UIC Permitting Update for Wilson Creek Recovery System  
**Follow Up Flag:** Follow up  
**Flag Status:** Red  
**Attachments:** 2009 Trench UIC letter text\_Page.pdf

Mr. Andrews,

My name is Eric Page and I am the new Chevron Environmental Management Company Project Manager for the Wilson Creek site. During our transition, Jeneé Homer indicated to me that you have had some questions regarding permits for the disposal of remediation generated fluids in the Wilson Creek disposal wells. We have researched the issue and Chevron's response to your questions is attached.

If you have any questions regarding the content of the letter, my contact information is provided below.

**Eric S. Page**  
Remediation Project Manager

**Chevron Environmental Management Company**  
Upstream Business Unit  
1400 Smith Street  
Room 40029  
Houston, TX 77002  
Tel 713 372 1022  
Mobile 832 439 3832

[epage@chevron.com](mailto:epage@chevron.com)  
<<2009 Trench UIC letter text\_Page.pdf>>

05/18/2009

## Chesson, Robert

---

**From:** Andrews, David  
**Sent:** Thursday, May 28, 2009 9:00 AM  
**To:** Chesson, Robert  
**Subject:** RE: Followup from Wilson Creek 09/18/2008 Meeting

---

**From:** Homer, Jeneé M [mailto:JHomer@chevron.com]  
**Sent:** Tuesday, October 28, 2008 3:06 PM  
**To:** Andrews, David; Canfield, Chris; King, Kevin  
**Cc:** Allred, Luke C. (LUCI); seth.maher@stantec.com; Dillon, David; Chesson, Robert  
**Subject:** RE: Followup from Wilson Creek 09/18/2008 Meeting

David,  
We will continue our record search. I noticed I inadvertently omitted the second referenced attachment, the CDWR permits and applications. I have attached it now.

**Jeneé Homer (last name change from Briggs)**  
Project Manager

**Chevron Environmental Management Company**  
Upstream Business Unit  
1400 Smith Street  
Room 40028  
Houston, TX 77002  
Tel 713.372.1035  
Fax 713.372.1107  
Mobile 281.543.9826  
[jhomer@chevron.com](mailto:jhomer@chevron.com)

**Confidentiality Note:**

This e-mail message is intended solely for the individual or individuals named above. It may contain confidential attorney-client privileged information and attorney work product. If the reader of this message is not the intended recipient, you are requested not to read, copy, or distribute it or any of the information it contains. Please delete it immediately and notify the sender by return e-mail or by telephone at 713.372.1035.

---

**From:** Andrews, David [mailto:David.Andrews@state.co.us]  
**Sent:** Tuesday, October 28, 2008 3:55 PM  
**To:** Homer, Jeneé M; Canfield, Chris; King, Kevin  
**Cc:** Allred, Luke C. (LUCI); seth.maher@stantec.com; Dillon, David; Chesson, Robert  
**Subject:** RE: Followup from Wilson Creek 09/18/2008 Meeting

Jeneé',

Thank you for the follow-up submittal. I understand that CDWR granted permit approvals for extraction of groundwater from recovery trenches. I do not dispute that approval, and CDWR would be the appropriate agency to authorize the extraction. However, CDWR does not have jurisdiction to authorize disposal into UIC wells.

I am more interested in any written approval that Chevron may have which authorizes disposal of the remediation water into Class II UIC wells. The disposal activity would have required approval from COGCC and possibly concurrence on the approval from U.S. EPA Region VIII. COGCC is an implementing agency for U.S. EPA with regard to Class II UIC wells in Colorado.

Class II fluids include produced water, used drilling fluids, used workover fluids, used stimulation fluids, and used fluids from circulation during cementing operations recovered from oil & gas production, injection, and exploratory wells. Other fluids require special approval, and I understand that U.S. EPA does not generally consider groundwater remediation fluids to be Class II waste, even if they are associated with cleanup of an oil & gas location.

I am copying Bob Chesson, considering that he may have been involved at some level with any disposal approval from COGCC.

Thanks,

**David D. Andrews, P.E., P.G.**  
Engineering Supervisor - Northwest Area

**State of Colorado**  
**Oil and Gas Conservation Commission**  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203  
Office Phone: (303) 894-2100 Ext. 145  
Cell Phone: (970) 456-5262  
Fax: (303) 894-2109  
E-mail: [David.Andrews@state.co.us](mailto:David.Andrews@state.co.us)  
Website: <http://www.cogcc.state.co.us/>

**I WILL BE WORKING FROM COGCC'S RIFLE OFFICE MONDAY 10/27 THROUGH WEDNESDAY 10/29.**  
**MY RIFLE OFFICE PHONE NUMBER IS (970) 625-2497 EXT. 1.**  
**I WILL RETURN TO THE DENVER OFFICE ON THURSDAY 10/30.**

---

**From:** Homer, Jeneé M [mailto:JHomer@chevron.com]  
**Sent:** Tuesday, October 28, 2008 2:32 PM  
**To:** Andrews, David; Canfield, Chris; King, Kevin  
**Cc:** Allred, Luke C. (LUCI); seth.maher@stantec.com  
**Subject:** RE: Followup from Wilson Creek 09/18/2008 Meeting

David-

Thank you for reviewing the materials. Hopefully Chris will get a chance to look at the proposal as well. We just performed our October monitoring event and plan to collect the second round of gauging data in November.

I have attached a transmittal letter and referenced permit package for the three recovery trenches. We are still in the process of performing a record search and data compilation effort in order to provide the materials requested during the September 2008 meeting. Since all three trenches have now been turned off, we may collectively elect to stop our data compilation process providing we have adequately closed the loop on the UIC action item (per the attached package) from the September 18th meeting. Please advise.

We will work to provide a hydrogeologic cross section for our next meeting in Spring 2009 based on your request.

Thank you.

**Jeneé Homer (last name change from Briggs)**  
Project Manager

**Chevron Environmental Management Company**

Upstream Business Unit  
1400 Smith Street  
Room 40028  
Houston, TX 77002  
Tel 713.372.1035  
Fax 713.372.1107  
Mobile 281.543.9826  
[jhomer@chevron.com](mailto:jhomer@chevron.com)

**Confidentiality Note:**

This e-mail message is intended solely for the individual or individuals named above. It may contain confidential attorney-client privileged information and attorney work product. If the reader of this message is not the intended recipient, you are requested not to read, copy, or distribute it or any of the information it contains. Please delete it immediately and notify the sender by return e-mail or by telephone at 713.372.1035.

---

**From:** Andrews, David [<mailto:David.Andrews@state.co.us>]  
**Sent:** Monday, October 20, 2008 2:59 PM  
**To:** Homer, Jenee' M; Canfield, Chris; King, Kevin  
**Cc:** Allred, Luke C. (LUCI); [seth.maher@stantec.com](mailto:seth.maher@stantec.com)  
**Subject:** RE: Followup from Wilson Creek 09/18/2008 Meeting

Jenee,

Thanks for the submittal. Your proposal looks OK to me, but you may need Chris's approval to proceed.

With regard to the UIC data summary, I would advise that you start with searching your records for written approval for injecting the water into a Class II well. If you have documentation that approval was received, then I don't necessarily need the summary of wastes injected. You may want to compile the data anyway for your own records.

Thanks for the boring logs. It would be helpful if you could prepare at least one hydrogeologic cross section through the valley for our meeting next spring.

**David D. Andrews, P.E., P.G.**  
Engineering Supervisor - Northwest Area

**State of Colorado**  
**Oil and Gas Conservation Commission**  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203  
Office Phone: (303) 894-2100 Ext. 145  
Cell Phone: (970) 456-5262  
Fax: (303) 894-2109  
E-mail: [David.Andrews@state.co.us](mailto:David.Andrews@state.co.us)  
Website: <http://www.cogcc.state.co.us/>

**DURING THE WEEK OF OCTOBER 20, I WILL BE IN THE DENVER OFFICE ON MONDAY AND TUESDAY. I WILL BE TRAVELING ON WEDNESDAY AND FRIDAY, AND I WILL BE IN A MEETING IN MONTROSE ALL DAY THURSDAY.**

---

**From:** Homer, Jenee' M [<mailto:JHomer@chevron.com>]  
**Sent:** Monday, October 20, 2008 9:14 AM

**To:** Andrews, David; Canfield, Chris; King, Kevin  
**Cc:** Allred, Luke C. (LUCI); seth.maher@stantec.com  
**Subject:** Followup from Wilson Creek 09/18/2008 Meeting

Dear Gentlemen:

I am writing this morning to thank you for taking the time to meet and discuss the Wilson Creek project on September 18th, 2008. The project team has prepared a set of meeting notes with the intent of capturing the main points and action items from the meeting. I have attached the meeting notes as well as a few deliverables to satisfy some of the indicated action items. Specifically, attached you'll find:

- September 18th meeting notes
- PSH monitoring proposal
- Select boring logs
- A copy of the presentation we gave on September 18th

<<091808\_WC meeting notes.pdf>> <<2009 WC PSHM COGCC proposal.pdf>> <<WC boring & well logs.pdf>>  
<<COGCC Mtg\_091808.pdf>>

Please contact me with any comments or questions that arise as you review the attached materials. Thank you for your time and consideration.

**Jeneé Homer**  
Project Manager

**Chevron Environmental Management Company**

Upstream Business Unit  
1400 Smith Street  
Room 40028  
Houston, TX 77002  
Tel 713.372.1035  
Fax 713.372.1107  
Mobile 281.543.9826  
[jhomer@chevron.com](mailto:jhomer@chevron.com)

**Confidentiality Note:**

This e-mail message is intended solely for the individual or individuals named above. It may contain confidential attorney-client privileged information and attorney work product. If the reader of this message is not the intended recipient, you are requested not to read, copy, or distribute it or any of the information it contains. Please delete it immediately and notify the sender by return e-mail or by telephone at 713.372.1035.

---

**From:** Roedell, Jeff W. (JRoedell)  
**Sent:** Tuesday, September 30, 2008 11:54 AM  
**To:** david.andrews@state.co.us; chris.canfield@state.co.us; kevin.king@state.co.us  
**Cc:** Allred, Luke C. (LUCI); seth.maher@stantec.com; Homer, Jeneé M  
**Subject:** Rangely presentation

Gentlemen,

We appreciate the time you spent with us reviewing the Wilson Creek remediation and the overview of Rangely. Attached is the presentation given for Rangely.

<< File: COGCC Update 09\_08.pptm >>

As always, if you have any questions or would like to visit either of the fields, please feel free to contact Luke or me.

Thanks,

**JEFF RODELL**

Rangely Technical Team Leader  
970 (CTN) 675-3816 - Office  
970-629-2971 - Cell

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message; then please delete this email.