



DEPARTMENT OF NATURAL RESOURCES

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February 19, 2009

Mr. Jim Sewell
Shell Oil Company
P.O. Box 576
Houston, TX 77001

RE: Site Closure Requests
B.E. Rice #2, COGCC Remediation Project #3634, Logan County
C.F. Green A-16, COGCC Remediation Project #3633, Logan County
J.F. Kirk #6, COGCC Remediation Project #3632, Logan County
Mittelstadt E-1, COGCC Remediation Project #3631, Logan County
Castor B-1, COGCC Remediation Project #3516, Weld County
State A1, COGCC Remediation Project #3630, Morgan County

Dear Mr. Sewell,

Colorado Oil & Gas Conservation Commission (COGCC) staff has reviewed the Site Closure Request prepared by Wisdom Associates for the referenced salt scar sites. Based on the soil sample results and the pictures documenting site conditions in June 2008, COGCC has the following response for each site.

B.E. Rice #2, Logan County

Results for all three soil samples fall outside the allowable range for pH and exceed the allowable level of 4 mmhos/cm for conductivity. The Rice #2 Mid sample also slightly exceeds the allowable level of 12 for Sodium Absorption Ratio (SAR). Reference COGCC Table 910-1 Allowable Concentrations.

Based on the pictures, the vegetative cover appears to be primarily Kosha weed. It does not appear that with the exclusion of noxious weeds there would be sufficient total cover of live perennial vegetation to sufficiently prevent soil erosion in accordance with COGCC 1004 c. (2). As a result, closure will not be granted at this time. Additional remediation and reclamation will be required to address the inorganics in soil and the vegetative cover.

C.F. Green A-16, Logan County

Results from the soil sample exceed the allowable levels of conductivity and SAR. Photo's #11 and #12 show substantial areas still devoid of vegetation. As a result, closure will not be granted at this time and additional remediation and reclamation will be required to address inorganics in soil and the vegetative cover.

J.F. Kirk #6, Logan County

Results from the soil sample exceeded the allowable levels of conductivity and SAR. Photo's #13 and #14 indicate substantial vegetative cover in areas, but areas also remain completely devoid of vegetation. Additional remediation and reclamation will also be required at this location to address the inorganics in soil and to establish a final vegetative cover in accordance with COGCC Rule 1004 c. (2).

DEPARTMENT OF NATURAL RESOURCES: Harris Sherman, Executive Director

COGCC COMMISSION: Richard Alward - Thomas L. Compton - Mark Cutright - Michael Dowling - Joshua B. Epel - Kimberlee Gerhardt - Trésil Houpt - Jim Martin - Harris Sherman
COGCC STAFF: David Neslin, Acting Director - Debbie Baldwin, Environmental Manager - Patricia C. Beaver, Hearings Manager - David K. Dillon, Engineering Manager

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Mittelstadt E-1, Logan County

The soil sample exceeded the allowable level of conductivity; however, both pH and SAR fell within allowable levels. Pictures #15, 16, 17 indicate a vegetative cover comparable to the surrounding undisturbed land and sufficient to prevent erosion, although it appears that the primary plant is Kosha weed.

The COGCC will consider closure of this site on the following condition. Provide a letter signed by the surface owner documenting that they are satisfied with the current condition of the salt scar site. Also, the remaining silt-fence needs to be removed and properly disposed.

Castor B-1, Weld County

The soil sample result did not exceed any of the inorganic levels and the vegetative cover appears consistent with nearby undisturbed land and sufficient to prevent erosion, although it appears that the primary plant is Kosha weed.

COGCC will also consider closure of this site on the condition that a letter signed by the surface owner is provided documenting that they are satisfied with the current condition of the salt scar.

State A1, Morgan County

The State A1 soil sample result did not exceed any of the allowable concentrations of inorganics in soil and the vegetative cover appears comparable to nearby undisturbed land and sufficient to prevent erosion.

If the fence was installed to protect the seed bed during reclamation, it will need to be removed and properly recycled or disposed prior to approval of closure. An alternative is to provide a letter signed by the surface owner requesting to keep the fence as a beneficial improvement to the property.

Please provide the supplemental information requested and a brief summary of additional work planned to bring the remaining sites to closure. Field work should be planned to take place no later than May 2009.

Should you have any questions, please call me at (303) 637-7178.

Sincerely,



John E. Axelson, P.G.
Environmental Protection Specialist

Cc: David Neslin – COGCC Acting Director
Debbie Baldwin – COGCC Environmental Manager
Diana Burn – COGCC Engineer
Bo Douglas – Wisdom Associates