

# STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

November 7, 2007

Mr. Robert Chesson  
Colorado Oil & Gas Conservation Commission  
1120 Lincoln Street #801  
Denver, Colorado 80203

0445-15312

RE: Pending drilling permits, Williams Production Co, Rifle Colorado

Dear Mr. Chesson:

On August 21, 2007 you contacted the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (CDPHE) concerning 14 Williams Production pending drilling permits in Section 13, Township 6 South, Range 94 West, near Rifle, Colorado because the area where the wells are proposed is within an Institutional Control boundary that has been set up to protect the public from adverse impacts from contaminated groundwater from a nearby former uranium mill. You indicated that possible conditions of approval to these permits would be based on further discussions with both the U.S. Department of Energy (DOE) and CDPHE. In follow-up conversations, CDPHE agreed to provide you with information regarding soil contamination on the property and also to provide you with a list of concerns that you will use to develop conditions of approval.

This letter provides our response to your request. First, with regard to soil contamination, CDPHE was recently made aware of radiological surveys on the property that indicated that there might be windblown uranium mill tailings on the property. As a follow-up, Williams hired HRL Compliance Solutions, Inc. (HCS) to conduct a radiological survey on the footprint of the Clough 16 well pad. The survey was conducted on October 16, 2007. As a result of this survey (documented in the attached letter from HCS), it appears that windblown tailings are most likely not present on the drill pad area. However, adequate dust control should be required during earthmoving operations on the drill pad to minimize dust. Please note that Williams should confirm that their earthwork operations will be restricted to the area that was surveyed by HCS. If additional earthwork is needed outside of the Clough 16 well pad, additional radiological surveys will be needed to confirm the absence of windblown uranium mill tailings.

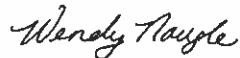
With regard to groundwater, the U.S. Department of Energy will be providing you with detailed information about the groundwater contaminant plume at this property. No groundwater should be brought to the surface and groundwater should not be used during drilling or completion of the well.

R. Chesson  
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In addition, measures should be taken to ensure that contamination in the shallow aquifer is not allowed to migrate to deeper, uncontaminated aquifers. Any surface or conductor casing that is installed to prevent the mixing of groundwater should be tested to prove that its seal is effective.

Please contact Wendy Naugle at (303) 692-3394 if you require additional information or if you have any questions related to these issues.

Sincerely,



Wendy K. Naugle, P.E.  
Engineer/Hydrogeologist  
Uranium Mill Tailings Project

Eagle Mine Superfund Site Project Manager

cc: Rich Bush, DOE  
Paul Oliver, CDPHE GJ  
Herman Lucero, HCS  
Rob Bleil, Williams RMT



216 North Ave., Suite 1  
Grand Junction, CO 81501  
Phone: 970-243-3271  
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October 23, 2007

Ms. Wendy Naugle, P.E.  
Engineer/Hydrogeologist  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
HMWMD-RP-B2  
Denver, Colorado 80246

**RE: UMTRA Radiological Survey  
Clough 16 Well Pad**

Dear Ms. Naugle:

HRL Compliance Solutions, Inc. (HCS) was contracted by Williams Production RMT (Williams), to perform a radiological survey on the Clough 16 well pad located in West Rifle, Colorado. Specifically, the proposed well to be drilled on the existing Clough 16 well pad is identified as the RWF 23-13 well. The legal description is identified as the NE1/4, SW1/4, Section 13, Township 6 South, Range 94 West of the 6<sup>th</sup> Principal Meridian in Garfield County, Colorado.

Williams was informed during the permitting process that a potential radiological problem existed on the well pad identified above. HCS contacted the Grand Junction CDPHE office and requested the use of a radiation detector. The radiological survey was performed on the footprint of the proposed well pad on October 16, 2007. The survey was performed on ~ 10' centers. The readings collected during the October 16, 2007 survey range from 14  $\mu$ R/hr to 22  $\mu$ R/hr. HCS established background for the area as 14-22  $\mu$ R/hr.

Based on discussions with you, Paul Oliver, and Phil Egidi of the CDPHE, it has been determined that because the readings are relatively low and within background of the localized area, no additional preparation will be required when the well pad is constructed. The soil that is disturbed during construction of the well pad will be managed in such a manner that is consistent with the construction of all other well pads. At the request of your office, the following requirements will be adhered to during the construction and development of the well pad:

- 1: Upon construction of the well pad, water will be applied to the disturbed area as dust control.
- 2: Groundwater, if encountered will **not** be brought to the surface, and will not be used at any time during the drilling or completion of the well.
- 3: Upon completion of the well, the well pad will be reclaimed to predisturbance conditions.

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HRL Compliance Solutions, Inc.  
Grand Junction, CO  
*Environmental Consulting Professionals*

HRL Compliance Solutions, Inc., on behalf of Williams, requests your concurrence with the findings and requirements by your signature below. Upon your concurrence, we will request that the COGCC process the APDs.

Please do not hesitate to contact me at the above listed number should you or your team have any questions, comments, or concerns on this matter.

*Sincerely,*

**HRL Compliance Solutions, Inc.**



Herman Lucero, REM  
Managing Principal

The CDPHE concurs with the findings and requirements outlined in this letter to construct the Clough 16 well pad.

\_\_\_\_\_  
CDPHE Authorized Representative

\_\_\_\_\_  
Date

cc: R. Bleil, Williams RMT  
S. Brady, Williams RMT  
R. Bush, Department of Energy  
File