

Axelson, John

From: Axelson, John
Sent: Tuesday, July 19, 2011 12:35 PM
To: 'Jim Wieger'
Cc: jpchonka@netscape.net; Willis, Rob; Baldwin, Debbie; Lindblom, Steven
Subject: RE: Coral Production Christiansen NOAV 200308970

Jim,

Land treatment on site is allowed under rule 907.e.(2). If you decide that is the approach you want to take it would require submittal of a Form 27 with a detailed workplan including location of the land treatment area, construction drawings, information on liner material, stormwater controls, types and volumes of nutrients to be added, etc.. Written surface owner approval would be required and there would need to be quite a bit of sampling done up front to profile the current contaminant levels in regard to Table 910-1. Then as the land treatment is proceeding there would need to be regular sampling to determine if biodegradation of the organics is occurring. Once a sufficient number of samples verified that the Table 910-1 standards had been met, the material could be used beneficially on site.

The problem I've seen with a lot of the land treatment projects is the lack of routine maintenance. The material needs to be aerated on a regular basis and moisture has to be maintained as well as nutrients. Often these end up turning into big piles of dirt that sit for years and the operator ends up having to haul it all off in the end anyway. The risk is that you go to the expense of building the land farm and paying for all of the analytical and maintenance, then the material never meets the Table 910-1 standards, so disposal becomes inevitable.

My suggestion would be to try to find an alternate landfill such as the Buffalo Ridge, Waste Management Facility in Keenesburg or Clean Harbors at Last Chance or plan on submitting a detailed workplan for land treatment via a Form 27 and we will consider it.

Regarding the extension request, COGCC will approve an extension as long as you're moving forward with the corrective actions. We are scheduled to meet on July 26 to discuss enforcement related to the rule violations. If you could come up with a timeline we can discuss the extension request at the meeting.

I hope this information helps. Please give me a call if you would like to discuss further.
John

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From: Jim Wieger [<mailto:jimwieger@qwestoffice.net>]
Sent: Monday, July 18, 2011 2:12 PM
To: Axelson, John

Cc: jpchonka@netscape.net

Subject: Coral Production Christiansen NOAV 200308970

Hi John,

Our efforts have been moving in the right direction regarding the closure of the skim pits. We had a pad built for the skim tank and had a 300 bbl tank internally coated for the skim tank. It should be set this week then we can finish drying out the pits for excavation. The soil remediation of the road has been stymied due to the limited disposal options. Gary Gardiner's preliminary estimate to haul to Logan County is astronomical due to the distance and volume, so we are looking at different alternatives. As I mentioned before, Washington County is unable to receive contaminated soils for quite some time. One of our options is to create a land farm and remediate the soil on site. Do you feel this is a viable alternative? Given the scope of remediation, we are requesting an extension to the NOAV corrective action completion date so that we can fully evaluate all the alternatives.

Thanks,

Jim Wieger