

From: [Lujan, Carlos](#)
To: [EnviroScan, OGCC](#)
Subject: FW: FW: No Further Action Request - Hettinger 34-18 Tank Battery - SWSE S18 T5N R64W - API# 05-123-19476
Date: Wednesday, September 26, 2012 11:02:59 AM
Attachments: [Hettinger 34-18 Manifests.pdf](#)
[PDC NFA Letter Hettinger 34-18 Track #2230122 Sept 26 2012.pdf](#)
[image003.png](#)
[image004.png](#)

Amber,

Please upload the attached Document (Manifests), the NFA letter, and this email to
Location ID # 330696

API # 123 19476

Thanks,

Christine,

Thanks for submitting the manifests and for mentioning the sampling agreement reached with COGCC on June 5, 2009. John Axelson indicated to me recently that he had been verbally notified immediately after the incident occurred, and that a verbal agreement had been reached with PDC to submit the Form 19 after completion of excavation and sampling activities.

Please find the NFA letter for the remediation and reclamation of the spill occurred on the Hettinger 34-18 tank battery.

Based on review of data presented, it appears that no further action is necessary at this time at this site. However, should future conditions at the site be discovered of contaminant concentrations in soils exceeding COGCC standards or if groundwater is found to be significantly impacted, COGCC may require that further investigation and/or remediation be conducted.

The Spill/Release Form 19 has been closed in COGCC database.

Thanks,
Carlos

Carlos A. Luján, Ph.D

Groundwater Hydrologist

Cell: (720) 272-2306

**Colorado Oil & Gas Conservation
Commission**

1120 Lincoln Street, Suite 801, Denver, CO
80203

(303) 894-2100 Ext. 5105

Carlos.lujan@state.co.us



Please consider the environment prior to printing this e-mail...

From: Christine Wasko [mailto:cwasko@tasman-geo.com]
Sent: Wednesday, September 26, 2012 8:58 AM
To: Lujan, Carlos
Cc: Hayden.Truscott@pdce.com; mlindstrom@tasman-geo.com; Brandon Bruns
Subject: RE: FW: No Further Action Request - Hettinger 34-18 Tank Battery - SWSE S18 T5N R64W - API# 05-123-19476

Operator: PDC Energy, Inc.
Facility Name: Hettinger 34-18
Site Legals: SWSE S18 T5N R64W
API# 05-123-19476
Spill Tracking # 2230122
Location ID# 330696

Carlos,

I am writing in response to your request for additional information for the NFA letter that was submitted to the COGCC on August 15th for the PDC Energy, Inc. Hettinger 34-18 tank battery. Per your request, I have attached copies of the Waste Management (WM) manifest for the impacted soils that were transported to the WM facility in Ault, CO. In addition, after impacted soils were removed from the site and soil sample analytical data confirmed that remaining soil in the excavation was in compliance with COGCC Table 910-1 soil limits, the site was backfilled and final reclamation completed per the COGCC 1000 series rules. The excavation was backfilled with clean fill material and compacted prior to rebuilding the tank battery.

In addition, based on the COGCC rule references you made in your email, we wanted to highlight the discussion you had with Randall and Brandon during your meeting on September 20th. PDC provided you with a copy of the "Produced Water, Condensate, and Drilling Mud Profile Sampling" Plan that was approved by the COGCC on June 5, 2009. Moving forward, based on the results of this approved Plan, Tasman will be sampling impacted soils that result from a condensate/oil release for benzene, toluene, ethylbenzene and total xylenes (BTEX), naphthalene, and total petroleum hydrocarbons (TPH).

Please let me know if there is any other information you require to issue a NFA letter.

Christine Wasko

Environmental Scientist
Tasman Geosciences
5690 Webster Street
Arvada, CO 80002
Office (720) 988-2024
Cell (720) 409-8791



----- Original Message -----

Subject: FW: No Further Action Request - Hettinger 34-18 Tank Battery -
SWSE S18 T5N R64W - API# 05-123-19476
From: "Lujan, Carlos" <Carlos.Lujan@state.co.us>
Date: Thu, August 23, 2012 10:51 am
To: "EnviroScan, OGCC" <OGCC.EnviroScan@state.co.us>
Cc: <Hayden.Truscott@pdce.com>, <bbruns@petd.com>,
<mlindstrom@tasman-geo.com>, <cwasko@tasman-geo.com>, "Axelson, John"
<John.Axelson@state.co.us>

Amber,

Please enter/upload the attached Form 19 and link it to:

- Location ID # 330696
- API # 123 19476

Thanks,

Christine,

Thanks for submitting the Spill/Release report.

There are a couple of questions that need to be clarified before the Form 19 can be closed and a No Further Action notification sent to the operator:

According to the Form 19, excavation was completed to a depth of 15 ft bgs (max) to remove impacted material, and impacted material was sent to an authorized landfill.

There is no mention to backfilling and reclamation.

- a. Please clarify if backfilling/reclamation was done and in accordance to COGCC Rules 900 and 1000 series.***
- b. Please submit waste disposal documentation for waste generated from cleanup activities.***

Also, for future references, please refer to COGCC Rules (<http://cogcc.state.co.us/>).

I would like to highlight the following rules:

1. Rule 906. SPILLS and RELEASES

- b. (2) Spills/releases which exceed 20 barrels of an E&P waste shall be reported on COGCC Spill/Release Report, Form 19, and shall also be verbally reported to the Director as soon as practicable, but no more than 24 hrs after discovery. **COGCC was not notified of the release.**
- a. (5) For all reportable spills, operators shall submit a Spill/Release Report, Form 19, within ten (10) days, after recovery. **Release occurred on April 24, 2012 and was reported 4 months later on Aug15, 2012.**
- 2. Rule 910. CONCENTRATIONS AND SAMPLING FOR SOIL AND GROUND WATER
- b. (2) Sampling and analysis for site investigation or confirmation of successful remediation shall be conducted to determine the nature and extent of impact and confirm compliance with appropriate concentration levels in Table 910-1. **Table 910-1 includes BTEX, TPH, PAHs, Inorganics (EC, SAR, pH), and Metals. Only BTEX and TPH (and Naphtalene) were included in the confirmation analysis. PAHs are frequently waived by the responsible COGCC manager but inorganics are practically always requested. With EPS' approval, consultants/operators may use a reduced list of analytes (i.e. BTEX, TPH, and inorganics) but without approval, all analytes in Table 910-1 must be analyzed in the laboratory and evaluated for compliance. That is a good reason to submit a plan to the COGCC before proceeding with site investigation and remediation.**
- 3. Rule 1002. SITE PREPARATION AND STABILIZATION. f. (stormwater management).;
- Rule 1003. INTERIM RECLAMATION

I also would like to point out the following regarding Notice of Completion (NOC) and request for No Further Action (NFA):

Form 19 is used by operators/consultants to notify COGCC that a spill/release has occurred recently. That's all there is to it. This is the first step to take as soon as possible after the incident.

- If the spill/release is not significant and the impact can be cleaned-up care with minor effort, then a Form 04 Sundry Notice can be submitted to request NFA, along with a letter report that describes the work done and the analytical results of confirmation samples.
- If the spill/release is significant a Site Investigation and Remediation Workplan, Form 27 may be required (See Rule 906 d.). Please contact the EPS when in doubt.

If you have questions or comments, please contact John Axelson or myself,

Thanks,
Carlos

Carlos A. Luján, Ph.D
Groundwater Hydrologist
Cell: (720) 272-2306

Colorado Oil & Gas Conservation

Commission

1120 Lincoln Street, Suite 801, Denver,
CO 80203

(303) 894-2100 Ext. 5105

Carlos.lujan@state.co.us



*Please consider the environment prior to printing
this e-mail...*

From: Axelson, John

Sent: Tuesday, August 21, 2012 11:49 AM

To: Lujan, Carlos

Subject: FW: No Further Action Request - Hettinger 34-18 Tank Battery - SWSE S18 T5N R64W - API# 05-123-19476

From: Christine Wasko [<mailto:cwasko@tasman-geo.com>]

Sent: Wednesday, August 15, 2012 12:16 PM

To: Axelson, John

Cc: Brandon Bruns; Hayden; Michael Lindstrom

Subject: No Further Action Request - Hettinger 34-18 Tank Battery - SWSE S18 T5N R64W - API# 05-123-19476

John,

Tasman Geosciences (Tasman), on behalf of PDC Energy Inc. (PDC), has prepared this No Further Action Request (NFA) for Hettinger 34-18 Tank Battery (Site), API# 05-123-19476 located in the SWSE Quarter, Section 18-T5N-R64W. As noted in the attached Form 19, excavation and soil sampling activities have been completed at the Site to address residual petroleum hydrocarbon impacts in soil.

Should you have further questions, please contact Mike Lindstrom (720) 633-7027 at Tasman or Brandon Bruns (303) 831-3971 at PDC.

Thanks,

Christine Wasko
Environmental Scientist
Tasman Geosciences
5690 Webster Street
Arvada, CO 80002

Office (720) 988-2024
Cell (720) 409-8791

