



EnviroScan, OGCC <ogcc.enviroscan@state.co.us>

OXY Red Mountain Ranch 33-11 reserve pit 2215980

1 message

Spry ORourke, Linda <linda.spryorourke@state.co.us>

Mon, Oct 15, 2012 at 11:53 AM

To: OGCC EnviroScan <ogcc.enviroscan@state.co.us>, Daniel_Padilla@oxy.com, Igriffin@walshenv.com, Blair_Rollins@oxy.com, Chris Clark <Chris_Clark@oxy.com>, Chris Canfield <chris.canfield@state.co.us>, Carlos Lujan <carlos.lujan@state.co.us>

Blair and Daniel,

Thanks for the additional data and the summary of submittals. I have added some clarification to the paragraph of the submittal summary to complete the record. The paragraph is copied here with my responses indented in italics.

(from Oxy's 9/18/2012 email) Closure of the Red Mountain Ranch 33-11 reserve pit is in compliance with the COGCC 1000 Series Rules, specifically 1003.d (Drilling Pit Closure), which requires that COGCC Table 910-1 concentration levels are met. Please note that multiple sundry and/or email and meeting correspondence occurred between Oxy and the COGCC between 2010 and 2012. Oxy attempts to capture in this email, the associated correspondence and resolution with the ultimate goal being to provide adequate closure documentation for the Red Mountain Ranch 33-11 reserve pit.

Oxy submitted two Sundry notices both requesting Red Mountain Ranch 33-11 reserve pit closure. The first sundry was submitted on 01/27/10. Oxy does not know the status of this sundry as it was never given a document tracking number, and Oxy cannot find it on the COGCC online database. If this sundry is found by the COGCC, Oxy requests that it be withdrawn, again there is no document number associated with this sundry.

**COGCC response: The COGCC acknowledges that the 1/27/2010 version of the*

> sundry, with 'Detail of Work' section listed as 'apply different table 910

> standards' was not entered into the COGCC database at the time it was received.

The 1/27/2010 sundry was entered into the COGCC database on 6/9/2011 and assigned document number 2567008, which has been in the COGCC database since that time.

The second sundry was later submitted on 09/08/11 at the request of the COGCC where some sundry (tech page 2) information was updated (reference COGCC document number: 2215980).

COGCC response: No reference to the 1/27/2010 sundry for this site was made in the 9/8/11 submission to indicate a previous version of the document existed.

The COGCC proceeded with reviewing the second sundry (2215980). As part of the review of the second sundry, the COGCC requested additional information and subsequently a re-submittal of the sundry (reference COGCC

document numbers: 2229463).

COGCC response: COGCC reviewed the 9/8/11 sundry (2215980) on 7/9/2012 and requested additional information describing background sample collection details and laboratory quality control information for the samples (doc 2229463). The background sample information provided in sundry 2215980 included DRO and ethylbenzene detections from a 5-point composite background sample, which indicated the possibility that at least one of the background samples may not have been from non-disturbed background materials.

In accordance with the 2012 annotated sundry notice(s) that the COGCC sent back to Oxy requesting further information and the Legacy Pit Closure meeting held on 08/22/2012, Oxy is submitting the attached documentation as information requesting to close the Red Mountain Ranch 33-11 reserve pit, under COGCC document number 2215980. Please note that Oxy is submitting this documentation under the existing sundry notice (2215980) and not re-submitting an edited sundry. All documentation should be filed under the location ID # (334525) only and any API # referenced on document #2215980 should be ignored. Included as part of the reserve pit closure documentation:

- Oxy's updated Red Mountain Ranch 33-11 reserve pit sampling narrative
- Oxy's previously submitted sample location map
- Oxy's updated Red Mountain Ranch 33-11 reserve pit tabulated data
- Oxy's supporting lab analytical data package reflecting the tabulated data

Please let Daniel or me know if sufficient information has been provided to close the reserve pit or if you require additional information.

Regarding the additional information supplied, it does meet my request for clarification.

Amber, please withdraw Sundry 2567008 with the following note:

"Sundry 2567008 is withdrawn from the COGCC system per OXY's request, see sundry 2215980" and verify that it is associated with location 334525.

Also, please approve Sundry 2215980, with the following COA:

"I have reviewed the data submittals for the Colorado Oil and Gas Conservation Commission (COGCC) sundries 2567008 and 2215980 and supplemental information provided on 9-19-2012. Based on the information provided, the COGCC staff approves the pit closure. However, should future conditions at the site be discovered of contaminant concentrations in soils exceeding COGCC standards, either on the site or at the background composite sampling locations, or if ground water is found to be significantly impacted, then OXY may be required to conduct further investigation and/or

remediation at the site."

Please relate this email and the attached file from 9-18-2012 to Sundry 2215980.

Thanks

Linda Spry O'Rourke

NW EPS II

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****Please Note:** As of Oct. 8, 2012, my email changed to linda.spryorourke@state.co.us (adding the final 'e' in my last name). Please update your address book accordingly. Thank you!*

3 attachments



SUNDRY NOTICE - 07709237-1-27-10 version-s.pdf

159K



RMR 33-11form 4 2215980-s.pdf

411K



Red Mtn Ranch 33-11 additional information submittal 09 18 2012.pdf

706K