



Re: Form 27 - In Situ Remediation Projects

1 message

Lujan - DNR, Carlos <carlos.lujan@state.co.us>

Thu, Jan 17, 2013 at 3:14 PM

To: "EnviroScan, OGCC" <OGCC.EnviroScan@state.co.us>

Cc: "Canfield, Chris" <Chris.Canfield@state.co.us>, "Hines, Christopher C." <Christopher.Hines@encana.com>, "Friesen, Kathy" <Kathy.Friesen@encana.com>

Amber,

Please generate three (3) Form 27s and corresponding REM #s based on the attached information (tables page 4, 5, and 6) and upload the attached document to their location ID #s (334093, 334416, and 334379) and REM projects. Please copy this email as well.

Per your suggestion (and for their convenience as well), I asked Encana to submit individual form 27s instead of a table with summary (I have to say that in the past I was the first in suggesting the use of summary tables, so if you need to blame someone, that would be me :)). Please let me know if you have questions with the data.

Please copy Chris and Chris, and myself with the REM #s.

Thanks,
Carlos

On Mon, Oct 8, 2012 at 12:50 PM, Hines, Christopher C. <Christopher.Hines@encana.com> wrote:

Hello Carlos:

I realize the Form 27 is not a great fit for cuttings remediation, there is no spill or pit associated with these projects. However, it seems to me that the Form 27 is also the preferred way of identifying a "Remediation Workplan" for treatment of material to conform with the 900 Series Rules and to generate remediation project numbers. I did speak briefly with Linda earlier this summer about this type of project.

I like the idea of submitting a Standard Remediation Procedure that could be referenced as a Doc# on future submittals. I'll move forward with that thought in mind.

The primary reason we've approached Form 27 submittals with a generic "batch system" is to accomplish/acknowledge the following:

- The Form 27 requests some information that usually isn't known before a project is initiated, despite the pre-job notification requirement.
- With the inherent project-specific information gap, we've approached the Form 27 as a pre-job notification that discloses the locations we plan to work on, what the shared problem is on the identified locations, and what our general approach will be to address the problem.
- Narrative and project-specific information can be disclosed more appropriately and accurately once the specifics of each location/project are known.

I want to be sure that you, Linda, Chris, and Alex are comfortable with the approach we use. I have several similar submittals pending, to be sure there is an understanding a phone conversation may be appropriate. Are you available this week?

Regards,

Christopher C. Hines | *Natural Resources Specialist | Environmental Field Coordinator*

Environmental Compliance Group (ECG) | Encana Oil & Gas (USA) Inc.

2717 County Road 215, Suite 100 - Parachute, CO 81635



Please Note: Encana's offices are closed on the 1st and 3rd Friday of every month.

From: Lujan, Carlos [mailto:Carlos.Lujan@state.co.us]
Sent: Tuesday, October 02, 2012 2:50 PM
To: Hines, Christopher C.; Canfield, Chris; Spry ORourke, Linda; Fischer, Alex
Cc: Friesen, Kathy; Baker, Andrew D.
Subject: RE: Form 27 - In Situ Remediation Projects

Chris (Hines),

Would you please give me a little bit of background regarding this Form 27? Is that a procedure that you discussed with Chris and/or Linda? I may be missing some previous discussions and therefore I am copying Linda, Chris and Alex to get their feedback.

I am a little bit confused because this Form 27 refers apparently to the in-situ remediation of cuttings in three pads (not associated to any pit closure or any specific spill/release). It is intended to be a boiler plate for remediation methods in general. Form 27s are intended to be used for a) pit closure work plans or b) spill/release remediation work plans. This Form 27 does not refer to any pit closure or to any spill/release. The Form 27 refers to cuttings. Are these cuttings from a pit being closed?

It occurs to me that Encana's could submit a Remediation Standard Procedure or something similar, describing remediation methods used or to be used in-situ. A document Number (Doc #) would be generated when uploaded to COGCC's database that could be then referenced in pit closure/spill remediation work plans.

From the Form 27 (see attached document):

This Form 27 (Site Investigation and Remediation Workplan) was prepared as supplement to an existing remediation plan, and/or to initiate a new in situ remediation project in Encana Oil & Gas (USA) Inc. (Encana's) Parachute area of operation. This submittal may supplement and/or initiate several remediation projects, and includes a spreadsheet listing current and/or proposed locations with Form 27 required site-specific information. If the spreadsheet identifies an existing remediation project number (Rem#), please consider this form a supplement to that project.

On the other hand, if I am not mistaken, you mentioned to me recently that it was easier for your staff to generate one Form 27 per site, instead of preparing a spreadsheet for a group of pit closures. I do remember checking with our data entry staff and they told me that individual form 27s were easier to enter than to generate X number of Form 27s from a spreadsheet. I also remember passing that information to you. So, if Encana prefers the "batch system" via spreadsheet it's OK, but if it easier for you to submit individual Form 27s, then do it that way.

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

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Carlos.lujan@state.co.us



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

From: Hines, Christopher C. [<mailto:Christopher.Hines@encana.com>]
Sent: Thursday, September 27, 2012 4:20 PM
To: Lujan, Carlos; Canfield, Chris; Spry ORourke, Linda
Cc: Friesen, Kathy; Baker, Andrew D.
Subject: Form 27 - In Situ Remediation Projects

Attached is a Form 27 prepared to generate remediation project numbers for three (3) locations in Encana's Orchard Unit. All 3 locations have drill cuttings stockpiles with light (<5,000 ppm) TPH impacts which we would like to remediate using an in situ remediation approach.

Linda's Area

C16OU – Location ID: 334416

K20OU – Location ID: 334379

Chris's Area

C10OU – Location ID: 334093

This submittal is also a first draft for a format/approach Encana would like to use to initiate in situ remediation projects. Let me know if there are any questions.

Regards,

Coordinator



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2 attachments

 **Form 27 - SP (K20OU, C10OU, C16OU) Cuttings Remediation Cells (09-25-2012).pdf**
626K

 **Form 27 - SP (K20OU, C10OU, C16OU)_Signed page_CALS.pdf**
70K