

STATE OF
COLORADO

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

Re: Fw: Facility ID 334104 1K Pit Closure

1 message

AWeinberg@nobleenergyinc.com <AWeinberg@nobleenergyinc.com>

Tue, Dec 3, 2013 at 3:43 PM

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

Cc: Alex Fischer <alex.fischer@state.co.us>

Carlos,

The pit we are trying to close is the produced water pit that was previously located in the southeast corner of the pad. The liner and leak detection system for the produced water pit were removed prior to closure in late 2009. The reserve pit and the produced water pit were both backfilled and the pad was re-graded.

We have schedule a drilling rig for next week and will have the site investigation complete by your December 31st deadline. Thanks,

Asher Weinberg
Senior Environmental Specialist
direct: 720.587.2198
cell: 970.573.8946
nobleenergyinc.com



From: "Lujan - DNR, Carlos" <carlos.lujan@state.co.us>
To: Asher Weinberg <AWeinberg@nobleenergyinc.com>
Cc: Alex Fischer <alex.fischer@state.co.us>
Date: 11/27/2013 01:06 PM
Subject: EXTERNAL: Re: Fw: Facility ID 334104 1K Pit Closure

Asher,

I couldn't find any document regarding pit closure on the South Grand Valley 1K pad. So, I suggest we start from scratch. There is still some confusion that need clarification before we move forward:

- The last document you sent me includes a letter from Noble to Chris Canfield, dated July 17, 2009 and a Form 27 pit closure work plan. They refer to the produced water pit located on the southeast corner of the pad (figure included). The form 27 and the letter refer to Facility ID # 288687, which is the production pit facility ID. (**See Doc 1K Form 27 pkg sm**)

- The document you sent me first, included a Form 27 and a letter by Olson to Brando Danforth,

OXY, dated also July 17, 2009. The form 27 talks about a pit liner and leak detection system removed but the letter refers to the reserve pit (which was originally located on the northwest corner of the pad). Nevertheless, the attached figure shows the same pit as in the other document, that is, the production pit on the southeast corner. **(See Doc 1K Pit Closure Report).**

- There was originally a drilling pit (that did not required permit). This pit located on the northeast corner of the pad was backfilled sometime between 2005 and 2009, probably in 2009 before the aerial photo was taken (See attached Powerpoint presentation). Noble must have sampled the bottom of the reserve pit before backfilling it. If no impact was found, there was no need to notify COGCC, just keep investigation report on file. If impact had been found, Noble would have had to submit a Form 19, notifying COGCC of a release discovered during pit closure. I don't know if Noble did that investigation but I will concentrate on the production pit closure which, I believe, is the one you are submitting the form 27 for.

Please confirm that the pit you are closing is the production pit (southeast corner of pad). Please let me know if liner has been removed as one of the form 27 (the one attached to Olson's letter) says that the pil liner and the leak detection system were removed. Please clarify which pit has been backfilled. The same form 27 says that the water pit was backfilled in late 2009. Aerial photos from 2009 and 2011 show the drilling/reserve pit backfilled and the production pit active.

IMPORTANT NOTES:

1) The No Further Action cannot be granted at this point because the investigation fails to demonstrate that there is no impact at the bottom of the pit. This is the first time that I see a pit closure investigation conducted (sampling) away from the pit. Results of the investigation conducted by Olson demonstrate that there is no hydrocarbon in the sub-soil at several feet away from the four corners of the pit. That is great but it does not address COGCC requirements to investigate the depth and extent of impact (if any) at the bottom of the pit. Enough discrete samples must be taken from the bottom of the pit (at least 5 discrete samples well distributed). If staining/odor, PID readings, etc. suggest that an area of the pit has been impacted then more samples should be taken. Discrete samples must be taken from the suspected area.

2) Samples from the bottom of the pit must be analyzed for **ALL** analytes listed on Table 910-1. Olson did not sampled for PAHs and metals.

3) Please clarify which pit is been closed; conduct a valid pit closure investigation; and resubmit an updated Form 27 and report before December 31, 2013.

Please give me a call or send me an email if you have questions or comments,

Thanks,
Carlos

Carlos A. Luján, Ph.D

Environmental Protection Specialist
NW Region

Colorado Oil & Gas Conservation Commission

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Website: <http://www.colorado.gov/cogcc>



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

On Tue, Nov 26, 2013 at 10:36 AM, <AWeinberg@nobleenergyinc.com> wrote:

Carlos,

Sorry for the confusion but I did some digging on our side and was able to find that a Form 27 requesting NFA was previously submitted to Chris Canfield in 2009 for this pit.

Did Chris ever grant closure for this pit? I was not able to find any information in your database.
Thanks,

Asher Weinberg
Senior Environmental Specialist
direct: 720.587.2198
cell: 970.573.8946
nobleenergyinc.com



----- Forwarded by Asher Weinberg/Denver/NobleEnergy/Samedan on 11/26/2013 10:34 AM -----

From: "Lujan - DNR, Carlos" <carlos.lujan@state.co.us>
To: Asher Weinberg <AWeinberg@nobleenergyinc.com>
Date: 11/21/2013 05:26 PM
Subject: EXTERNAL: Re: Facility ID 334104 1K Pit Closure

Asher,

There is something that I don't get with this pit closure: Why did the consultant sampled the perimeter of the pit (figure 2) and not the bottom of the pit? We know now that there was no impact in the vicinity of the pit, but what about the pit itself? Maybe there is some information I am missing.

The form 27 says that the liner was removed. Was it recycled or sent to a landfill or...?

Thanks,
Carlos

Carlos A. Luján, Ph.D
Environmental Protection Specialist
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Website: <http://www.colorado.gov/cogcc>



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

On Thu, Nov 21, 2013 at 4:46 PM, <AWeinberg@nobleenergyinc.com> wrote:
Carlos,

Please see the attached Form 27 requesting closure of a water pit in 2009 at our 1k facility. If you have any questions please get back to me. Thanks,

Asher Weinberg
Senior Environmental Specialist
direct: 720.587.2198
cell: 970.573.8946
nobleenergyinc.com



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3 attachments



Noble 1K pad.pptx

1706K



1K Form27 pkg sm.pdf

1330K



1K Pit Closure Report.pdf

715K



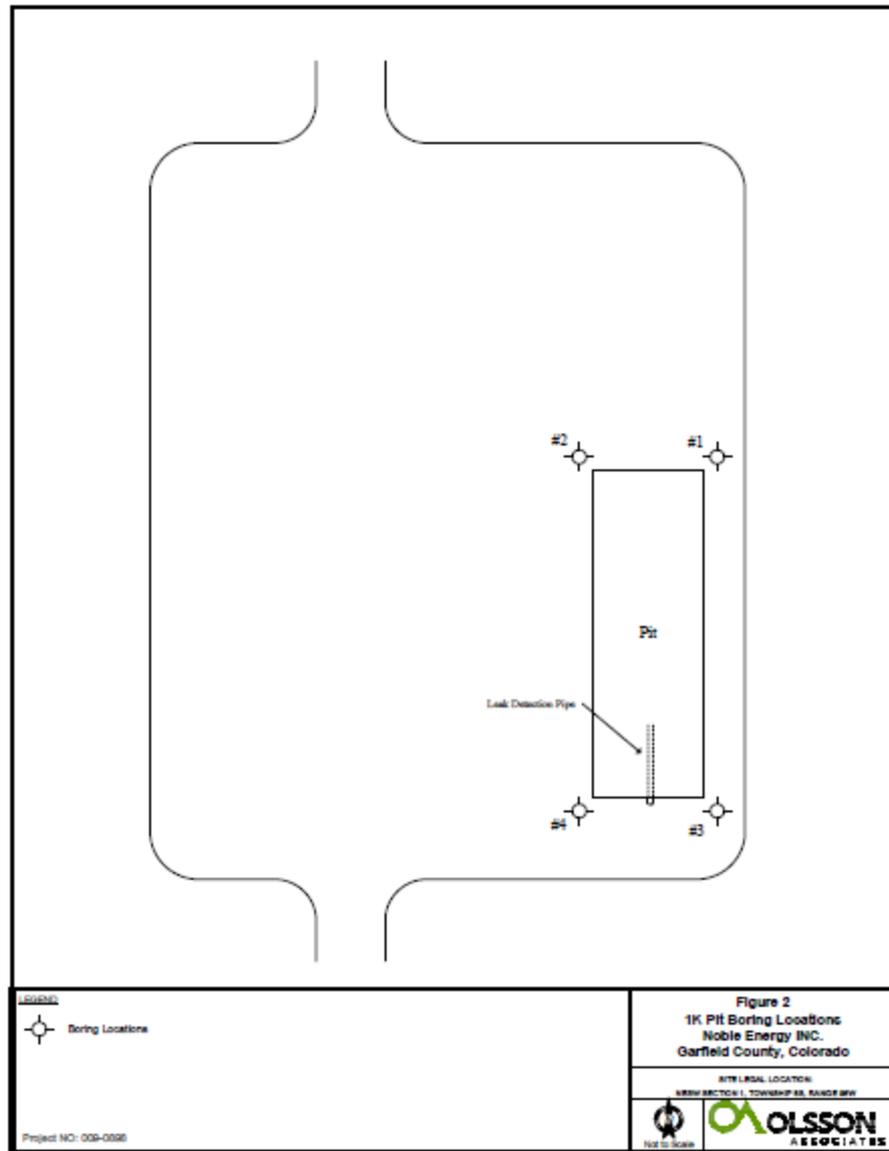
Noble 1K Pad. Location Facility ID # 334104.
Aerial photo 2005. Reserve Pit???



Noble 1K Pad. Location Facility ID # 334104.
Aerial photo 2009. Production Pit.



Noble 1K Pad. Location Facility ID # 334104.
Aerial photo 2011. Production Pit



Noble 1K Pad. Location Facility ID # 334104.
OLSON Report, July 17, 2009. Reserve Pit Investigation