



Re: Oliver Warren #1 Skim Pits Assessment Report (Remediation #8209, Conditionally Approved Form 27 Workplan#2147680, NOAV# 200390913)

1 message

Noto - DNR, John <john.noto@state.co.us>

Wed, May 28, 2014 at 11:32 AM

To: James Hix <jhix@olssonassociates.com>

Cc: "Teff, John (johnt@cmproductionllc.com)" <johnt@cmproductionllc.com>, "john.axelson@state.co.us" <john.axelson@state.co.us>, "Jeremy.Ferrin@state.co.us" <Jeremy.Ferrin@state.co.us>, "Kirk.mueller@dgslaw.com" <Kirk.mueller@dgslaw.com>, "Roger Freeman (roger.freeman@dgslaw.com) (roger.freeman@dgslaw.com)" <roger.freeman@dgslaw.com>, "Kym.Schure@state.co.us" <Kym.Schure@state.co.us>, OGCC EnviroScan - DNR <OGCC.EnviroScan@state.co.us>

Oliver Warren #1 Skim Pit Remediation, Remediation #8209

James,

The Skim Pit Assessment Report has been filed under Remediation #8209. As stated in the Assessment Report; following the removal of all visibly stained oily soil, a *minimum* of five confirmation soil samples will be collected -one from each pit bottom and one from each sidewall. All oily soil must also be removed from below the produced water flow line. Submit the samples to a laboratory for TPH (Diesel Range Organics and Gasoline Range Organics), PAH, SAR, EC, and pH analysis to verify compliance with Table 910-1.

Based on concentrations in the assessment samples, BTEX analysis will not be required. Based on the final TPH concentrations, PAH analysis may not be required if approved by COGCC. Based on background concentrations and concentrations of metals in the impacted area, COGCC will not require metals analysis. SAR, EC, and pH concentrations in soil that exceeds the Table 910-1 standards may be left in place with COGCC approval and if it is buried under at least three feet of clean fill.

Provide an analytical summary sheet/table comparing confirmation sample results to Table 910-1 Standards. Provide photographs of the excavation. Provide a drawing that shows the an outline of the excavation with dimensions and depth. Provide the full laboratory analytical report. Provide disposal documentation.

If CM Production plans land treatment of the oily waste, please provide the following items to the Colorado Oil and Gas Conservation Commission (COGCC) for approval prior to land treatment of the oily waste:

1. A copy of the surface owner agreement for the land application,
2. A map/aerial photograph of the proposed spread field property,
3. A Waste Management Plan with land application procedures, waste tracking, sampling and planned schedule,
4. An evaluation of surface drainage and site-specific stormwater control Best Management Practices, and
5. An evaluation of shallow groundwater based on existing data and identification of nearby wells and uses.
6. Although not required, pre-application "background" soils analysis may be useful for "site specific" comparison of the fluids and cuttings to background conditions as well as Table 910-1 values.

Analysis for DRO and GRO may be used to assess the progress of the land treatment.

Feel free to call or email if you have questions or concerns.

Thank you,

John Noto

Cc: Remediation # 8209

On Tue, May 27, 2014 at 11:16 AM, James Hix <jhix@olssonassociates.com> wrote:

John,

Attached is the assessment report for the Oliver Warren #1 skim pits that was conducted on March 27, 2014. CM Production is evaluating disposal options for the E&P wastes encountered in the skim pits. Due to the expected volume of the impacted soils CM Production may request to landfarm the soils on location. We will prepare a letter to the surface landowner to request permission to landfarm the soils and will prepare a supplemental Form 27 requesting to landfarm the impacted soils on location.

We will notify you 48 hours prior to closure of the pits so that they may be inspected as requested in the conditions of approval for Form 27 workplan #2147680. Confirmation soil samples will be collected from the sidewalls and the bottoms of the excavations and submitted for Table 910-1 parameters. CM Production requests that soil samples for assessing progress be analyzed for GRO and DRO ranges. Once the GRO and DRO results show that total petroleum hydrocarbons are less than 500 mg/kg, the soils will be analyzed for the other Table 910-1 parameters to show that these have been met.

James

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