

**STATE OF  
COLORADO**

Lujan - DNR, Carlos &lt;carlos.lujan@state.co.us&gt;

---

**Re: Pit Testing**

1 message

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

Wed, Nov 20, 2013 at 2:51 PM

To: Linn Wilson &lt;linn\_wilson@sisna.com&gt;

Cc: "Ventling, Catherine" &lt;cventling@blm.gov&gt;, Bob Koehler &lt;bob.koehler@state.co.us&gt;, Alex Fischer &lt;alex.fischer@state.co.us&gt;

Linn,

Thanks for getting back to me. In general, operators and their consultants have flexibility regarding the number and locations of samples as long as they are representative of the material been sampled. I can resend you some guidance regarding this case in particular, in a following email (guidance originally sent by Cathy Ventling, BLM). Samples will have to be sampled for all analytes listed in Table 910-1 of the COGCC Rules (900 series, last two pages). Series 900 of the COGCC Rules can be found in the COGCC web page, under RULES (left side of the Home page screen).

Regarding the other non-compliance issues, please review the Notice of Alleged Violation (NOAV) # 200335782 issued by Mike Longworth dated 12/29/2011 after completing an inspection to the Ismerelda-Federal 1-2-8-101 Site. Corrective actions were required by 6/1/2012. There are no records on file of actions taken by or response from Petro Mex. The NOAV mentions among other deficiencies a drilling pit that was not closed and which permit had expired since 10/7/2005.

What you need to do is to review the abatement on the NOAV and see what is still pending, to address them so that the NOAV can be resolved.

With regard to engineering issues such as MIT tests, etc. I am copying Bob Koehler to see if there is any particular compliance issue regarding this well pad.

If you have additional questions, feel free to call/email me. I will be glad to work with you in clarifying COGCC Rules and the path forward to reach full compliance.

Sincerely,  
Carlos

**Carlos A. Luján, Ph.D**

Environmental Protection Specialist  
NW Region

**Colorado Oil & Gas Conservation  
Commission****796 Megan Avenue, Suite 201****Rifle, Colorado 81650**

Phone: (970) 625-2497 Ext 7 (COGCC

Internal extension: 5689)

Fax: (970) 625-5682

Cell: (970) 286 3292

Email: [Carlos.Lujan@state.co.us](mailto:Carlos.Lujan@state.co.us)

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



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

On Wed, Nov 20, 2013 at 2:22 PM, Linn Wilson <[linn\\_wilson@sisna.com](mailto:linn_wilson@sisna.com)> wrote:

Your message is ready to be sent with the following file or link attachments:  
COGCD

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

---

 **COGCD.pdf**  
210K