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DOC 2141772

Remediation Project 3439 (Energy O&G) - Bayswater Moody 1-30 location (05-123-12702)1 message

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Mon, Sep 29, 2014 at 4:40 PM

To: "Meagan M. Miller" <mmiller@bayswater.us>, "Robert W. Carney" <RCarney@bayswater.us>

Cc: Martha Ramos - DNR <martha.ramos@state.co.us>, "Axelson, John" <john.axelson@state.co.us>, OGCC

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Colorado Oil and Gas Conservation Commission (COGCC) files include an unresolved remediation project associated with the Moody 1-30 location in the northeast quarter of the northeast quarter, Section 30, Township 7 North, Range 64 West in Weld County. COGCC Remediation Project Number 3439 was initiated by Energy Oil and Gas Inc., a former Operator of the Moody 1-30.

Project Number 3439 was initiated by Energy Oil & Gas, Inc. for a release at the buried produced water vessel. The workplan included a proposal to excavate impacted soil from the production areas and to remediate the soil onsite. The workplan was approved with the following conditions:

- Representative soil samples must be collected from any excavated area to confirm successful removal of impacted soils. Each sample shall be analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH)
- The workplan proposes that impacted soils will be remediated onsite. Land treatment must be conducted in accordance with 907.e.(2). Additionally, Rule 907.e.(2) states that land-treated oily waste incorporated in place shall not exceed the allowable concentrations in Table 910-1. Therefore, soil samples must be collected from the landfarmed soil and analyzed accordingly for TRPH to determine remedial success.
- Provide copies of the laboratory results and a site map showing sample locations and the land treatment area.

COGCC records do not include any documentation that the conditionally approved workplan was executed. In addition, it appears that the subject buried produced water vessel was located near the separator, between the current production facilities and the wellhead. The produced water vessel has since been removed and relocated to the current production facility location. See the 2005 and 2013 aerial images below. However, no assessment of the subsurface at the former produced water vessel location has been provided to COGCC.

2005 Aerial Image:



2013 Aerial Image



Therefore, COGCC requests Bayswater Exploration and Production to conduct an investigation to resolve Remediation Project Number 3439 and to perform a subsurface assessment at the former produced water vessel location. Please submit a Form 27 Site Investigation and Remediation Workplan within 60 days with a proposal to perform the requested work. The assessment should focus on the former produced water vault location as seen in historical aerial imagery.

If you have any questions regarding this request, please contact me at [970-461-2970](tel:970-461-2970).

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c: file Remediation Project 3439 - COGCC Correspondence to Bayswater