



STATE OF
COLORADO

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Conditionally Approved Form 27 - ECGS Ron Nelson Water Well (Rem #9425)

1 message

Young - DNR, Rob <rob.young@state.co.us>

Fri, Jan 29, 2016 at 3:58 PM

To: Ron Richards <rrichards@mehllc.com>, John Axelson - DNR <john.axelson@state.co.us>

Mr. Richards,

Facility ID # 444623, NENE 6 11n 52W Logan County, has been created for the Nelson Water Well to track the progress related to Remediation Project Number 9425.

The COGCC has conditionally approved the Peetz West Field (Ron Nelson Water Well) Form 27. The COGCC agrees that the methane detected in the Ron Nelson Water Well and the West Peetz storage gas (WP-D008-1 sample) are similar and therefore the plan outlined in the Form 27 should proceed along with the following additions:

1. The COGCC recommends the performance of a methane survey in order to aid in potential source area determination or to document that fugitive storage gas is not migrating to the surface. COGCC recommends surveying active and plugged and abandoned wells within the gas storage field.
2. Perform quarterly monitoring of the Nelson Water Well for the duration of the source area investigation. Collect water well samples prior to the treatment system for the following laboratory analyses:
 - a. 8260 VOCs full list, 8270 SVOC full list, pH, specific conductance, total dissolved solids, dissolved (methane, ethane, propane, butane, iso-butane, pentane, iso-pentane, hexane), total bicarbonate as CaCO₃, carbonate as CaCO₃, bromide, fluoride, sulfate, nitrate and nitrite as N, phosphorus, calcium, iron, magnesium, manganese, potassium, sodium, barium, boron, selenium, strontium and iron related bacteria. If the full list VOC constituents are not detected during the initial sampling event, only BTEX analysis shall be required during subsequent monitoring events. SVOC analysis shall not be required beyond the initial sampling event if the results are below the detection limits.
3. If access can be obtained, collect groundwater samples from surrounding water wells within an approximate 1 mile radius of the Nelson (Langness) water well and analyze for the same constituents requested for 2.a. Follow up sampling of the water wells will be determined based on the analytical results.
 - a. Specific water wells include Hugh Williams Permit No. 82501; Kevin & Peggy Michaels Permit No. 235877; U.S. Air Force Permit No. 11499-A. If the US Air Force well is not available to sample, the David Davis Permit No. 15889-A should be pursued as an alternate.
4. Upload all groundwater sample results via the EDD process into the COGCC database.
5. Collect pre and post methane treatment system water samples from the Ron Nelson Water Well for dissolved methane analysis in order to confirm the effectiveness of the treatment system. Collect the samples upon completion of the methane treatment system installation, and again within 5 days of the system startup. After the two initial sampling events, continue the post system sampling and analysis during the ongoing quarterly monitoring events.
6. If not already completed, offer to provide a methane monitoring and alarm system to the residence and/or the ground water treatment system building.
7. Schwake #A-3, 075-07168: Explain what was done with this well. We do not have any information updating the current well configuration. It was proposed to reenter to replug or convert to a monitor well. This was a condition on the 2010 Form 4's. Submit appropriate Form(s) and job verification reports. If well was re-

plugged; a Form 6-sra, wellbore diagram, plugging verification job summaries. If converted to a monitor well; a Form 5 - Drilling Completion Report, CBL, cement job summaries, Form 5A - Completed Interval Report, wellbore diagram. Timeframe: 30 days.

8. Perform a well evaluation of all oil & gas, injection, and gas storage wells, including plugged wells, within 0.75 miles of the Nelson water well to determine if any well has the possibility of having caused the problem. a) Perform and submit bradenhead tests - Form 17's. b) Review all well records, top of cement, stage and remedial cement, depth of surface casing, bradenhead pressure, plugging records, well integrity issues, production history, etc. Identify any likely candidates. c) Recommend remedial work. Timeframe: 60 days.

Please reference Rem #9425 on all future correspondence related to this project.

Thank you,

Robert J. Young
Environmental Protection Specialist



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