



Fwd: FW: Riley Remote Tank Battery ~ NESW 8-7S-96W ~ Facility ID #444670 ~ Location #335013 ~ Former REM#5224/REM #9490

1 message

Eckman - DNR, Annie <annie.eckman@state.co.us>
To: "EnviroScan, OGCC" <ogcc.enviroscan@state.co.us>

Mon, Apr 11, 2016 at 9:38 AM


Scanning Work Request:

Please upload the attached file as follows:

Document Name(s)	Certified mail receipt	
Document Number	<i>(leave blank if not already assigned)</i>	
Date Received	3/28/2016	
Is data entry needed?	NO	
Indexing Information	Unique ID Type	Unique ID Number
First	Remediation (REM)	9490
Second	Facility ID (FAC)	
Third*	NOAV	
Additional Instructions	Email exchange and 2 attachments	

Thanks!

Ann C Eckman, PG
Environmental Protection Specialist


 co_dnr_div_ogcc_300_rgb_ltrhd_v3

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----- Forwarded message -----

From: **Jake Janicek** <JJJanicek@caerusoilandgas.com>

Date: Mon, Mar 28, 2016 at 3:17 PM

Subject: FW: Riley Remote Tank Battery ~ NESW 8-7S-96W ~ Facility ID #444670 ~ Location #335013 ~ Former REM#5224/REM #9490

To: "Eckman - DNR, Annie" <annie.eckman@state.co.us>

Cc: Alex Fischer - DNR <alex.fischer@state.co.us>, Carlos Lujan - DNR <carlos.lujan@state.co.us>, "Spencer - DNR, Stan" <stan.spencer@state.co.us>, Jake Janicek <JJJanicek@caerusoilandgas.com>, Casey Richardson <crichardson@hrlcomp.com>, Michael McKee <mmckee@caerusoilandgas.com>

Ann,

Per your email below and the conversation you and I had about a month ago, I am forwarding you information concerning the Riley 1 (Remediation #9490) remediation project.

This project has been ongoing for several years. During that time, there has been four different environmental coordinators directing the remediation work, and at least three different environmental consultants conducting the work. Casey of HRL Compliance Solutions, Inc. (HRL) has provided some background to the decision making concerning this project, including the groundwater monitoring. His email

is also below. The proposal you requested below is attached (titled "Riley 1 Remediation Work Plan Signed 9.12.14"). According to Casey's email below, it is unclear whether my predecessor Ed Winters submitted this info to the COGCC for approval.

As you and I discussed, the groundwater at this site has not been sampled since 2011. According to Casey, Adell Heneghan of PDC (previous operator of the Riley 1 asset) informed HRL that the sampling of groundwater was no longer necessary. It is unclear whether this was an internal decision or if the COGCC granted them approval to cease collecting groundwater samples. I have no data regarding this decision except for Casey's email below. I did however find groundwater analytical results from February 2010 through December 2011. This data is also attached (titled "Riley 1 Groundwater Analytical Table and Results"). This is only speculation, but I assume someone made the decision to stop collecting groundwater samples because there were six sampling events where laboratory results indicated that the groundwater represented by SB01 was either below laboratory reporting limits or there was no groundwater present to sample. The remaining three sample locations exhibited either compliance with COGCC groundwater standards or water could not be collected at these sample locations during every sampling event.

As described in the COGCC-approved Form 27 (COGCC Document ID 2211267), 27 passive SVE wells were installed in the impacted area in October 2014. We will monitor these wells for VOCs until we feel like the concentrations have decreased enough to warrant collecting confirmation samples from the subsurface.

Please review the information above and attached and provide any comments you may have concerning this project.

Thanks

Jake

Jake Janicek

EHS Professional

120 North Railroad Ave. Parachute, CO 81635

Office: 970-285-9606 | Mobile: 970-778-2314 | jjjanicek@caerusoilandgas.com



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From: Casey Richardson [mailto:crichardson@hrlcomp.com]

Sent: Thursday, February 25, 2016 4:14 PM

To: Jake Janicek

Subject: RE: Riley Remote Tank Battery ~ NESW 8-7S-96W ~ Facility ID #444670 ~ Location #335013 ~ Former REM#5224/REM #9490

Jake,

HRL was tasked by PDC/Caerus to conduct soil sampling and develop a remediation plan for the Riley 1 remote tank battery location in 2011. A series of soil borings were advanced, and a remediation plan was developed and approved by Caerus. It was my understanding that Ed Winters was going to submit the necessary documents regarding the remediation plans. I was not notified if any documentation was ever submitted, but he gave us the approval to proceed with the work directive. HRL did not submit any documents to the COGCC on behalf of PDC/Caerus. Attached is the long term soil vapor extraction/passive system proposal which was approved by Caerus in 2014. It was decided that 'Phase 4: Soil Vapor Extraction' of the proposal would be implemented.

Upon receiving assignment of the project in 2011, Adell Heneghan gave HRL verbal instructions that further groundwater sampling was not necessary. Again, I am not sure if she notified the COGCC regarding the groundwater sampling. If she did, we do not have it in our records. HRL did not complete any groundwater sampling at any time regarding this project (I believe that the groundwater monitoring was conducted by Olsson).

I hope this helps and let me know if there is anything else I can do to assist you.

I will attached the soil boring logs in a separate email.

Casey Richardson | Project Lead

HRL Compliance Solutions, Inc.

2385 F 1/2 Road | Grand Junction, CO 81505

main [970.243.3271](tel:970.243.3271) Ex.419 | mobile [970.270.0242](tel:970.270.0242)



HRL COMPLIANCE SOLUTIONS, INC.
Environmental Consultants

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From: Jake Janicek [<mailto:JJanicek@caerusoilandgas.com>]

Sent: Wednesday, February 10, 2016 11:49 AM

To: Casey Richardson

Cc: Jake Janicek

Subject: FW: Riley Remote Tank Battery ~ NESW 8-7S-96W ~ Facility ID #444670 ~ Location #335013 ~ Former REM#5224/REM #9490

Casey,

Can you help with the conditions listed below for the Riley 1 Remediation Project? Did you submit any documents to the COGCC on behalf of Caerus/PDC after the original Form 27 was submitted in 2010? Also, do you know why PDC/Caerus stopped sampling the groundwater at the Riley 1? Based on the data, it no longer needs to be sampled, but I am wondering who made the decision to cease the sampling (COGCC approval or PDC/Caerus internal decision).

Please forward me any documents you may have including the passive SVE proposal/approval letter and all soil boring logs.

Thanks

Jake

Jake Janicek

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From: Eckman - DNR, Annie [<mailto:annie.eckman@state.co.us>]

Sent: Tuesday, February 09, 2016 10:20 AM

To: Jake Janicek; Randall Ferguson

Cc: Alex Fischer - DNR; Michael McKee; Charles Sprague; Carlos Lujan - DNR; Stan Spencer - DNR

Subject: Riley Remote Tank Battery ~ NESW 8-7S-96W ~ Facility ID #444670 ~ Location #335013 ~ Former REM#5224/REM #9490

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Gentlemen,

COGCC has reviewed the Form 27 Site Investigation and Remediation Workplan submitted by Caerus Oil and Gas, following the transfer of the above mentioned Facility. A signed copy of the Form 27 is attached, which has been approved with the following conditions:

- No information beyond the initial Form 27 approved in 2010 has been uploaded to the COGIS database. Please resubmit any missing documents, including the long term soil vapor extraction/passive system proposal (referenced as approved in September 2014 in the Project Summary).
- The onsite monitoring wells should be sampled on a quarterly basis, and analyzed for BTEX, DRO, and GRO.

Remediation #5224 has been closed, referencing Remediation #9490, in the COGIS database (document #200438983). Please reference the new Remediation **#9490** and Facility ID **#444670** (created for this tank battery) on future correspondence.

Thank you,

Annie

Ann C Eckman, PG

Environmental Protection Specialist

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Cc: REM 5224 and 9490

2 attachments



Riley 1 Remediation Work Plan Signed 9.12.14.pdf
2678K



Riley 1 Groundwater Analytical Table and Results.pdf
2906K