

COGCC Comments

REVISED 7/11/2011

Form 4 **Document # 2214917**

Black Hills Federal 35-2

Black Hills Fed 35-2 Sundry_NOI-SoilDisposal_sbmttd 7-5-11.pdf

The above-referenced Sundry Form 4 cannot be approved as submitted. Additional information is necessary. A revised Sundry Form 4 containing the following items must be received by COGCC and the identified actions be completed.

1. The revised Sundry Notice shall include the following:
 - a. A description of sampling methodology, number of samples collected, and where the samples were collected in or around the soil pile.
 - b. A scaled site diagram, including current frac pit location, documenting the areas where the waste/black soil and pit liner pieces were identified. Including approximate depth from ground surface where waste material was identified.
 - c. A discussion of Black Hill's historical site knowledge and working theory regarding the source of the waste/black soil and pit liner pieces.
 - d. Complete identification of receiving facility (including Mesa County Facility ID or operating permit number, facility address, facility contact)
 - e. Written acceptance approval from the receiving facility for the waste transfer
2. The sample results provided with this Sundry Form 4 show that the reporting limits for Benzo(a)pyrene and Dibenzo(A,H)anthracene are above Table 910-1 levels. All future sample analyses must have reporting limits sufficiently low to demonstrate compliance with all Table 910-1 levels.
3. Based on conversations with Mr. Dunham, the waste/black material was excavated from discontinuous 'pockets' in the new pit excavation and placed in the pile. Cleaner, over-excavated material from the new pit excavation was placed on top of the waste/black material pile. Prior to transport of the waste pile to the disposal facility, the interior of the waste/soils pile must be sampled for complete Table 910-1 analyte list to fully characterize the waste/black material. This sampling must be conducted in conjunction with a back hoe or other device capable of excavating to the center of the pit so that a representative sample of the black material can be obtained.
4. At least one COGCC or BLM representative must be present on site to observe the sample collection identified in Item #3 above. 48 hour notice is required to BLM and COGCC for coordination of sample collection oversight. 48 hour notice must be given via email Julia Christensen (jchristi@blm.gov) and Linda Spry O'Rourke (linda.spryorourk@state.co.us).
5. Comply with all BLM requests for sampling and analysis of materials associated with drilling and production.

6. Upon completion of the waste removal activities, an update Sundry Form 4 must be submitted. Information must include the volume of waste removed and haul tickets, bill of lading or similar documentation for the waste transfer. Acknowledgement that this information will be submitted after the work is completed must be included in the revised Sundry Form 4 submitted for approval prior to initiation of work.
7. Copy Julia Christensen on all correspondence relative to this project (jchristi@blm.gov)

Please E-mail the revised sundry notice, Form 4 requesting approval to linda.spryorourk@state.co.us.