



LARAMIE ENERGY, LLC
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GRAND JUNCTION, CO 81506
970-263-3600

July 6, 2020

Colorado Oil and Gas Conservation Commission
Attn: Alex Fischer
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Request for Consideration to be Given for Background Levels in Native Soils and Ground Water for Arsenic Per FAQ 31 COGCC Table 910-1 Footnote 1, and for pH Per FAQ 32

Spill #: 400703360
Date of Spill: 10/05/2014
Spill Site: Central Water Handling Facility (CWHF), Facility #417559

Dear Alex:

The lab samples for the CWHF filter pod spill indicate elevated levels of Arsenic for five sample locations. The background sample included in the analytical data table is from the 629-2 pad (location #335149), located approximately 2,174' from the CWHF. Attached is a map showing the location of the 629-2 pad in relation to the CWHF.

Due to the fact that the Arsenic levels at the CWHF fall below the background Arsenic data for the 629-2 pad, Laramie is requesting the COGCC take into consideration the background concentration of Arsenic in the native soils and is requesting relief from the Arsenic exceedances via FAQ 31 at the time of pad closure.

The CWHF sampling results also indicate elevated readings for EC and SAR. At the time of final reclamation, the CWHF will be buried under a minimum of three feet of backfill cover and soil that satisfies either the Table 910 levels for EC and SAR or the background levels for EC and SAR within three feet of the ground surface at the site. The facility will be reclaimed in accordance with the 1000 Series Rules. Therefore, Laramie is requesting relief from the EC and SAR exceedances via FAQ 32.

Sincerely,

Joan Proulx
Regulatory Analyst
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