

Discussion for using residential screening limits:

The nearest Water well to the Peggy 2525 location has a water level of 90 feet. When the well was drilled the perforated casing was set at 90 feet. Groundwater is not near the surface in this area. The water well construction documentation is attached to the Form 19.

The spill occurred in freezing weather, and did not penetrate more than a couple inches in the compacted road base on the pad. This most closely reflects Example 4 of COGCC OPERATOR GUIDANCE RULE 915.a - SOIL CONCENTRATIONS – DETERMINATION OF PATHWAY TO GROUNDWATER. Because of the observations and data gathered for this spill Verdad requests the application of the Residential SSLs rather than the Protection of Groundwater SSLs, since there is no likely pathway to Groundwater for this spill. And there are only 5 analytes for 8 samples each that require the Residential SSL to close the spill. The results are well below the Residential SSL threshold.