

Discussion for using residential screening limits:

A nearby well adjacent to the location has water level of 28 feet. When the well was drilled borings installed on the site indicate the pad is underlain by a sandy loam mixture to depths ranging from the surface to 13 feet (ft.) below ground surface (BGS). Subsurface soils generally consisted of a sand clay mixture to 28 ft. BGS or 30 ft. BGS (depending on the boring) underlain by a well graded sand to depths drilled of approximately 43 ft. to 48.5 ft. BGS. Groundwater is not near the surface in this area.

All samples confirm spill cleanup. There is no evidence of impacted soils from oil and gas operations yet Barium in 1 sample (west wall) is just over the Protection of Groundwater Screening Level by 1.77 mg/kg (considering background levels) and under the Residential SSL by 14,910 mg/kg. This project 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 cleanup, Verdad requests the application of the Residential SSLs rather than the Protection of Groundwater SSLs, for one analyte, barium on the west wall sample, since the pathway to Groundwater is over 24 feet for this project.