

From: [Axelson, John](#)
To: HeathMireles@Contres.com
Cc: [Lindblom, Steven](#); [James Bernal](#); jmahoney2644@comcast.net; [Scan, OGCC](#)
Subject: NOAV 200328837 E&P Waste CR95 Weld County
Date: Wednesday, November 30, 2011 11:57:28 AM
Attachments: [J22826-2 Std Tal L4 Package Mini Final Report.pdf](#)
[James Complaint CR95 Waste Results.xls](#)

Heath,

I received analytical results for the grab sample of waste I collected on 11/15/11 at the CR95 property. Results indicate concentrations of benzene, arsenic, mercury and pH exceed Table 910-1 standards. In addition, TPH was elevated and several other semi-volatile organic compounds were detected in the material. The COGCC rules for beneficial amendment into native soil state that, "..... the resulting concentrations shall not exceed those in Table 910-1." To be clear, the sample I collected was taken prior to incorporation into native soil. Based on the sample results, I recommend analyzing the confirmation samples for the following:

TPH – GRO + DRO + ORO
BTEX
PAHs listed on Table 910-1
Inorganics – EC, SAR, pH
Metals listed on Table 910-1

Because arsenic and mercury exceeded the Table 910-1 standard, it would be helpful to establish background conditions for the metals. This would require collection of one or more soil samples on the property from an area undisturbed by the waste application. It would probably be helpful to analyze the background sample(s) for the inorganics as well as the metals. The intent would be to show that the metal concentrations in the areas where waste was incorporated is similar to the background concentrations.

In the NOAV, a Form 27 with a workplan proposing sample locations and analyses was requested. As soon as that is submitted I will provide a quick review and the sampling can proceed. Once the sample results verify compliance with Table 910-1, the surface reclamation can begin. If the sampling demonstrates exceedances of Table 910-1 standards, then we will discuss potential remedial alternatives. I've attached a summary of the COGCC lab results along with the report for reference. If you have any questions, please give me a call.

Thank you,

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