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ENVIRONMENTAL ASSESSMENT REPORT

for the

OCCIDENTAL OIL SHALE, INC. LOGAN WASH PROJECT

and

RELATED DEVELOPMENTS

by

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for

OCCIDENTAL OIL SHALE, INC. Bakersfield, California and Grand Junction, Colorado

November 1976

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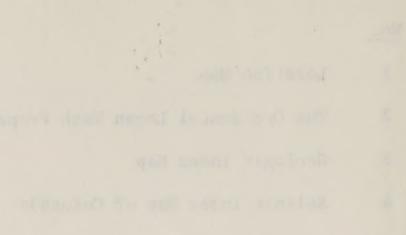
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Introduction

The Energy Research and Development Administration has requested proposals for demonstrating the technical and economic feasibility of different <u>in situ</u> shale oil recovery methods. Corollary objectives are to demonstrate the best explosive fracturing and rubblizing technique for the process and to determine operating conditions necessary to obtain desired retorting results. Occidental Oil Shale, Inc. has responded to this request and proposes to conduct these demonstrations for their modified in situ process.

Occidental proposes to do some early retort formation and operation studies at its Logan Wash site (known also as the D. A. Shale site) near DeBeque, Colorado, and to undertake the technical and economic feasibility demonstrations at another, as yet unnamed, site. The latter site has a higher grade of ore and is more suitable for the demonstrations, but it will not be ready for this purpose for approximately two years. Hence, early work on retort formation and operation will be done on the existing site.

Agencies of the Federal Government are required to assess the nature and extent of environmental impacts that may result from their proposed actions. Where significant impacts on the human environment are projected, the agencies are required to prepare a detailed environmental impact statement to accompany their proposals through agency review processes (40 CFR 1500.2 (b) and the National Environmental Policy Act of 1969, Section 102 (2) (c)). This assessment report has been prepared in accord with these requirements for the shale oil recovery demonstration that is being proposed for ERDA funding by Occidental Oil Shale, Inc.

I. The Proposed Action

A. Specific Experiment

The Occidental process consists of mining an amount of low grade shale below and above an ore body, rubblizing the shale between the mined areas, and retorting the rubble in place. An over-burden of several hundred feet typically remains above the rubble. The amount of material mined is only that necessary to provide mine access and a bulk porosity in the rubble of 15 to 25 percent.

Retorting is begun by introducing a fuel and air to burn at the top of the rubble pile until the shale is heated sufficiently to produce oil and gas and a carbonaceous residue. The oil flows to a sump at the bottom of the retort and is drawn off through pipes that were installed before the rubble pile was formed. The gas is also piped off at the bottom of The inergy Research and Development Medicineral and second formal fills of possis in demonstrating the technical and seconds. Inertified is a different in stin that pill renteers seconds. Inertifier and are to demonstrate inergin the determine seconds. Include and and is a signed for the process and to determine aperating and anticity of the details destand retained to determine aperating the lock of the technic of the process and to determine aperating the lock of the technic of the process and to determine aperating the lock of the technic of the process and to determine aperating the lock of the technic of the process and to determine the technic of the lock of the technic of the process and to determine the technic of the lock of the technic of the process and to determine the technic of the lock of the technic of the process and the technic of the lock of the technic of the process and the technic of the lock of the technic of the process and the technic of the technic of the technic of the process of the technic of technic of the technic of technic of the technic of the technic of the technic of technic of the technic of tec

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the retort. The carbonaceous residue burns as air is continued and the fuel is turned off. As the residue burns, the rock below the flame is heated further and continues to produce oil, gas, and more residue. The latter then burns, continuing the process until the retorting front reaches the bottom of the retort. The front moves downward at a rate of approximately a foot per day, depending upon such factors as the rate at which air is supplied.

In addition to oil and gas, the process produces water of combustion. The water contains significant amounts of dissolved solids and other impurities and must be treated if it is to be discharged to either ground or surface waters. Depending on the amount, it may be used in the process. If limited amounts must be discarded, they can be evaporated in such a way that the residue will not degrade ground and surface waters.

The stack exhaust is relatively clean. Particulates, oxides of nitrogen and sulfur dioxide are virtually nil. For the Logan Wash site, unburned carbon monoxide, hydrocarbon and hydrogen sulfide emissions are sufficiently low that they can be discharged through a tall stack without causing air quality standards to be violated. For the larger demonstration at the new site, sulfides will be removed from the exhaust, which will then be burned to recover its heating value. This will result in the hydrocarbons and carbon monoxide being converted to water and carbon dioxide.

Disturbance of the terrain at either site will be minimal. spent shale and only minimal amounts of raw (natural) shale ?? 20% will be disposed of on the surface; the latter will be placed not in canyons or gulches and vegetated to resemble their surroundminimal ings. Water supplies will be protected from pollution by runand off from or percolation through these mineral waste piles. combined There will be some surface facilities, e.g. roads, buildings, stacks and equipment, but only a small fraction of either site in situ will be affected. Care will be taken to locate such facilities and above so that important habitats and vistas are not adversely affected. ground Upon eventual abandonment of a site, surface facilities will be retorting reduced and the terrain will be restored as much as practical. is used

there wit A developmental phase of the project has been underway at Logan Wash since June 1972 and now employs about 182 people, 152 at the site and 30 in a Grand Junction office. There are also up to 50 contractor personnel at the Logan Wash site. The Occidental work force at Logan Wash is not expected to grow over a twoyear period, nor is growth expected in the maximum number of contractor personnel. The personnel situation for the new site has not yet been formulated, but it will be detailed and reviewed with ERDA and other concerned governmental agencies as it is developed. Thus, adequate plans can be laid for housing, schooling, etc. in advance of the need.

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Phases II and III will occur at the new site, with Phase II beginning two years after the overall project is initiated. Phase II involves technical evaluation of the formation and simultaneous burning of a two-retort cluster that will produce 2,500 barrels of oil per day. Phase III involves economic evaluation of two clusters of two retorts each, i.e. formation and simultaneous burning of four retorts. These will produce 5,000 barrels of oil per day.

Environmental baseline studies for Phase I, i.e. for the Logan Wash site, have been conducted in the following sixteen areas:

Meteorology Ambient air quality Air pollution modeling Ground water hydrology Surface water hydrology — Archaeology

Paleontology
 Flora
 Fauna

Engineering geology and — soil engineering Noise Seismometry Subsidence and uplift Process water treatment and disposition Vegetation experiments Socioeconomic impacts

Work performed on these studies was defined in consultation with cognizant government agencies. A minimum of one year's baseline data gathering has been completed for all environmental dimensions where this is relevant. Other studies answer specific questions for planning, evaluation, or permits. Over sixty permits have been obtained for the project on the basis of these studies and design information; a list is available on request. Work in these various areas is described in the appropriate sections below, and reports now available on the studies are listed in Table 1.

Environmental research will be continued at Logan Wash in the following areas during Phase I:

Meteorology Ambient air quality Air pollution modeling Ground water hydrology Surface water hydrology Flora

Fauna Subsidence and uplift Process water disposition Vegetation experiments Socioeconomic impacts

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These studies will provide information and analyses to allow actual impacts, if any, to be detected and evaluated and to plan for reclamation of the site when it is eventually abandoned.

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Table 1

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Baseline Environmental Reports for Occidental's Logan Wash Site

- H. E. Cramer Co., Inc., <u>Comparison of Upper-Air Data at Logan Wash</u>, <u>Colorado</u>, with Upper-Air Data at Grand Junction, Colorado, February 1, 1976 (prepared for Claremont Engineering Company).
- 2. H. E. Cramer Co., Inc., <u>Verification of the Diffusion Model Used</u> by H. E. Cramer Co. to Calculate the Stack Height for Room 4 at <u>Logan Wash, Colorado</u>, February 1, 1976 (prepared for Claremont Engineering Company).
- 3. David B. Thomas, <u>Archaeological Survey of the Garrett Research and</u> <u>Development Co., Inc. Logan Wash Site, Garfield County, Colorado</u>, October 1974 (prepared for Claremont Engineering Company).
- Daniel Guthrie, <u>Paleontological Survey of Proposed Dump Sites on the</u> <u>D. A. Shale/Callahan Trust Lands, Carfield County, Colorado</u>, October 1974 (prepared for Claremont Engineering Company).
- 5. Wm. O. Wirtz, II, et al., <u>An Ecological (Vertebrate) Survey of the Garrett Research and Development Co., Inc. Logan Wash Oil Shale Site (plus 3 supplements and a summary report), October 1974; January, April, August, and September 1975 (prepared for Claremont Engineering Company).</u>
- Neil E. West, et al., An Ecological Baseline Study of Flora, Vegetation, and Soils on the Occidental Oil Shale, Inc. Logan Wash Site Near DeBeque, Colorado, March 26, 1976 (prepared for Claremont Engineering Company).
- Alfred B. Focke, <u>Background Noise Measurements in the Vicinity of</u> <u>DeBeque and Grand Valley, Colorado, 1 March to 1 November 1975</u>, March 30, 1976 (prepared for Claremont Engineering Company).
- 8. Carl F. Petersen, <u>Seismic Measurement at Grand Valley, Colorado</u>, December 12, 1975 (prepared for Claremont Engineering Company).
- Leighton and Associates, <u>Geotechnical Evaluation of Proposed Oil</u> <u>Shale Development Activities by Occidental Oil Shale, Inc. Near</u> <u>Grand Valley, Colorado</u>, March 26, 1976 (prepared for Claremont Engineering Company).
- 10. R. T. Chew, L. C. Bender, and I. G. Studebaker, <u>Environmental Con-</u> siderations for a Proposed Mineral Waste Disposal Pile in Logan Wash, 1975 (prepared for Occidental Oil Shale, Inc.).

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- 11. W. O. Wirtz and R. L. Redmond, <u>Cliff Nesting Raptors on the Logan</u> <u>Wash Site, Garfield County, Colorado</u>, June 15, 1976 (prepared for <u>Claremont Engineering Company</u>).
- 12. Neil E. West and James R. Irvine, <u>Distribution and Extent of</u> <u>Astragulus lutosus Jones, Ceanothus martinii M. E. Jones, and</u> <u>Festuca dasyclada Hack</u>, September 1975 (prepared for Claremont Engineering Company).

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Environmental baseline studies for Phases II and III, i.e. for the new site, have been completed in the following thirteen areas: -6-

Meteorology	Flora
Ambient air quality	Fauna
Air pollution modeling	Ecosystem relationships
Ground water hydrology	Soil productivity
Surface water hydrology	Socioeconomic impacts
Archaeology	Revegetation of disturbed
Scenic values	surfaces

These studies have also been defined in consultation with cognizant government agencies. Since negotiations for the site are just being finalized, it is not possible to give more information about the studies at this time. Perhaps it will suffice to say (1) that environmental research will be continued at the new site during Phase I as preparation for Phases II and III and (2) that as soon as possible these results will be reviewed with ERDA in conjunction with plant design information to make any revisions needed. Moreover, environmental research will be conducted during Phases II and III in accord with a plan worked out with ERDA before ERDA-sponsored work takes place on the new site. In the meantime, it should be noted that Phases II and III will be designed to meet applicable environmental regulations.

B. Known Environmental Issues There will be Methanese Methanese Main 1401 Main 1400 Main 1400

The Occidental modifed <u>in situ</u> process for producing shale oil has many environmental advantages over alternative processes. These include relatively clean atmospheric exhausts, relatively little consumptive use of water, relatively little surface disturbance, no surface disposal of spent shale, minimal requirements for a temporary construction force, and a relatively smaller permanent work force. There are, however, some environmental considerations that need to be understood if the process is to be managed properly. These considerations are:

- 1. Minimizing atmospheric pollution economically
- 2. Avoiding water pollution economically.
- 3. Oil mist recovery.

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4. Reclaiming sites economically upon abandonment.

An environmental research effort is planned to address each of these issues during the proposed program. Each aspect of this research is described later in connection with discussions of potential environmental impacts (see Section III.B.). and transmined as althout the fact for the that a 11 and this for the

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II. The Existing Environment

A. Locations

The Logan Wash site is in Garfield County, Colorado, 51 miles by road northeast of Grand Junction; see Figure 1. It is north of the Colorado River, west of Parachute Creek, and east of Roan Creek. It includes part of Spruce Ridge on the north side of Logan Wash north of Mt. Logan and includes Mt. Callahan.

The Logan Wash property, Figure 2, total 4360 acres and comprises most of Section 23, the north half of Sections 26 and 25, and the southeast quarter of Section 24, in T7S, R97W; and the south half of Section 18, the north half and southwest quarter of Section 19, the northwest quarter of Section 30, the south half and northeast quarter of Section 17, the north half of Section 20, the southwest quarter of the southeast quarter and the southwest quarter and the north half of Section 16, the south half of Section 9, the southwest quarter of Section 10, and the northwest quarter of Section 15 in T7S, R96W. The nearest towns are Grand Valley, six and a half miles away, and DeBeque, nine miles away (straight-line distances to the adits).

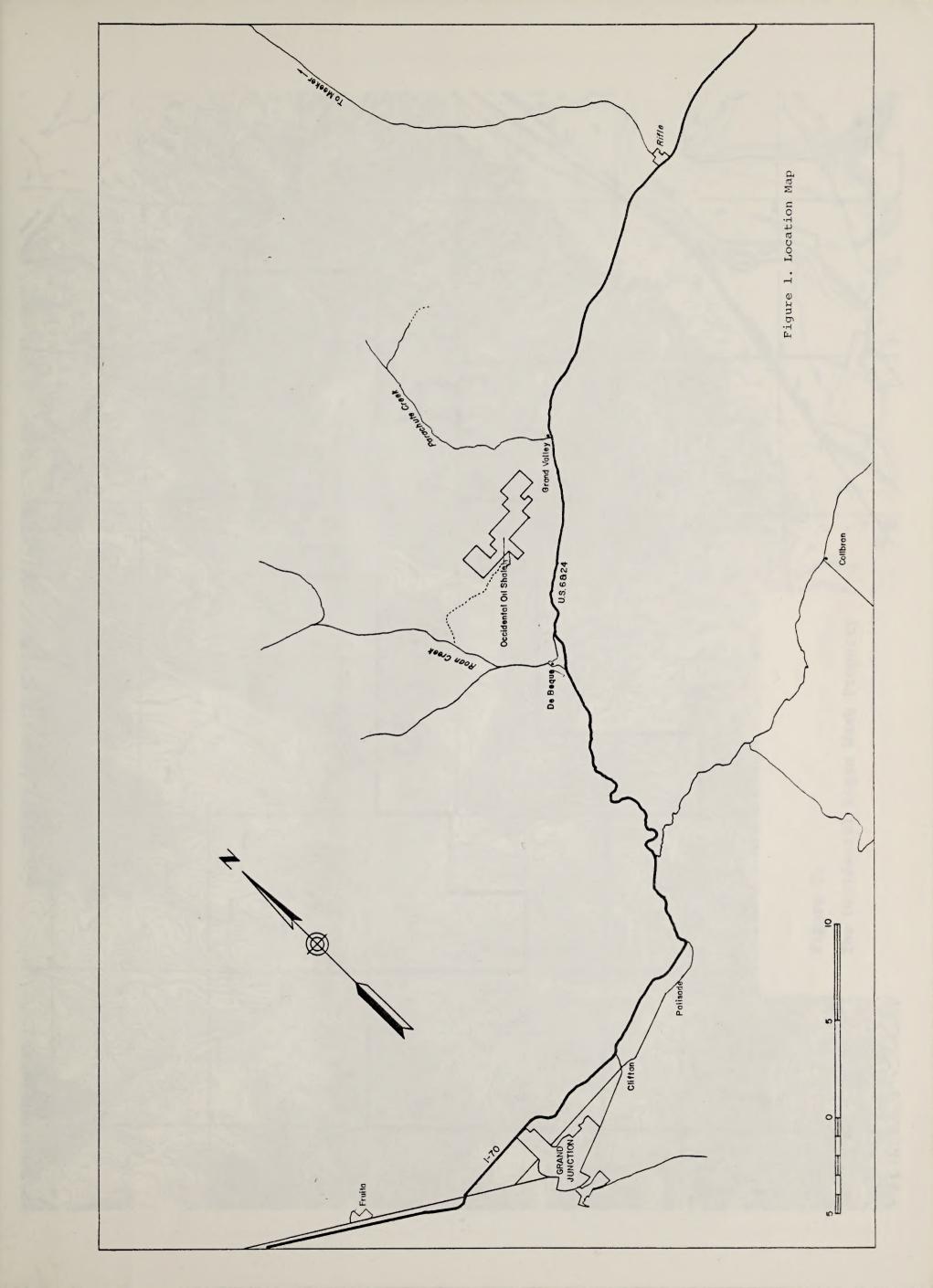
The new site lies further north, closer to the center of the Colorado oil shale region. Its exact location cannot be described until negotiations for its acquisition have been completed.

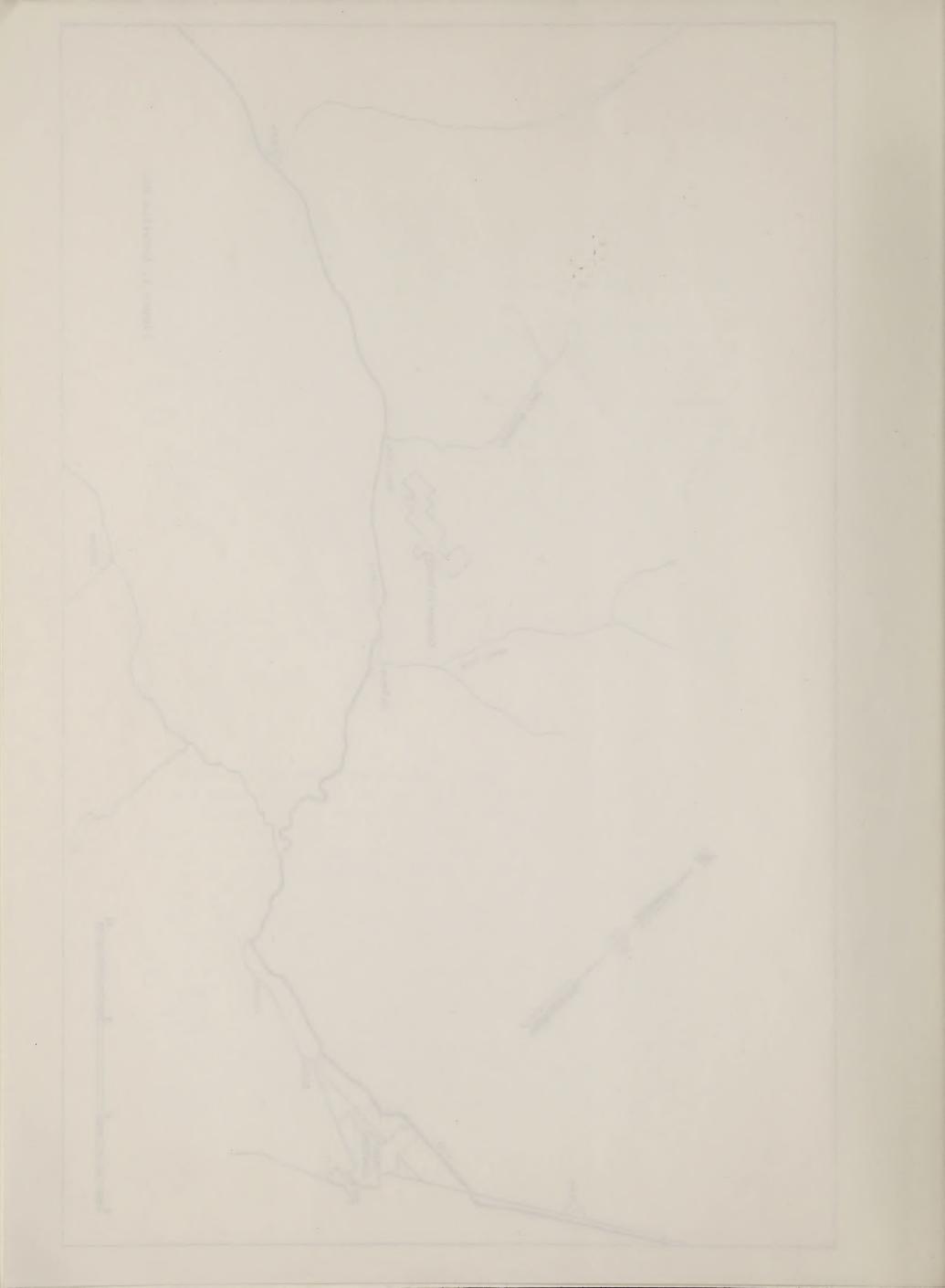
B. Geology

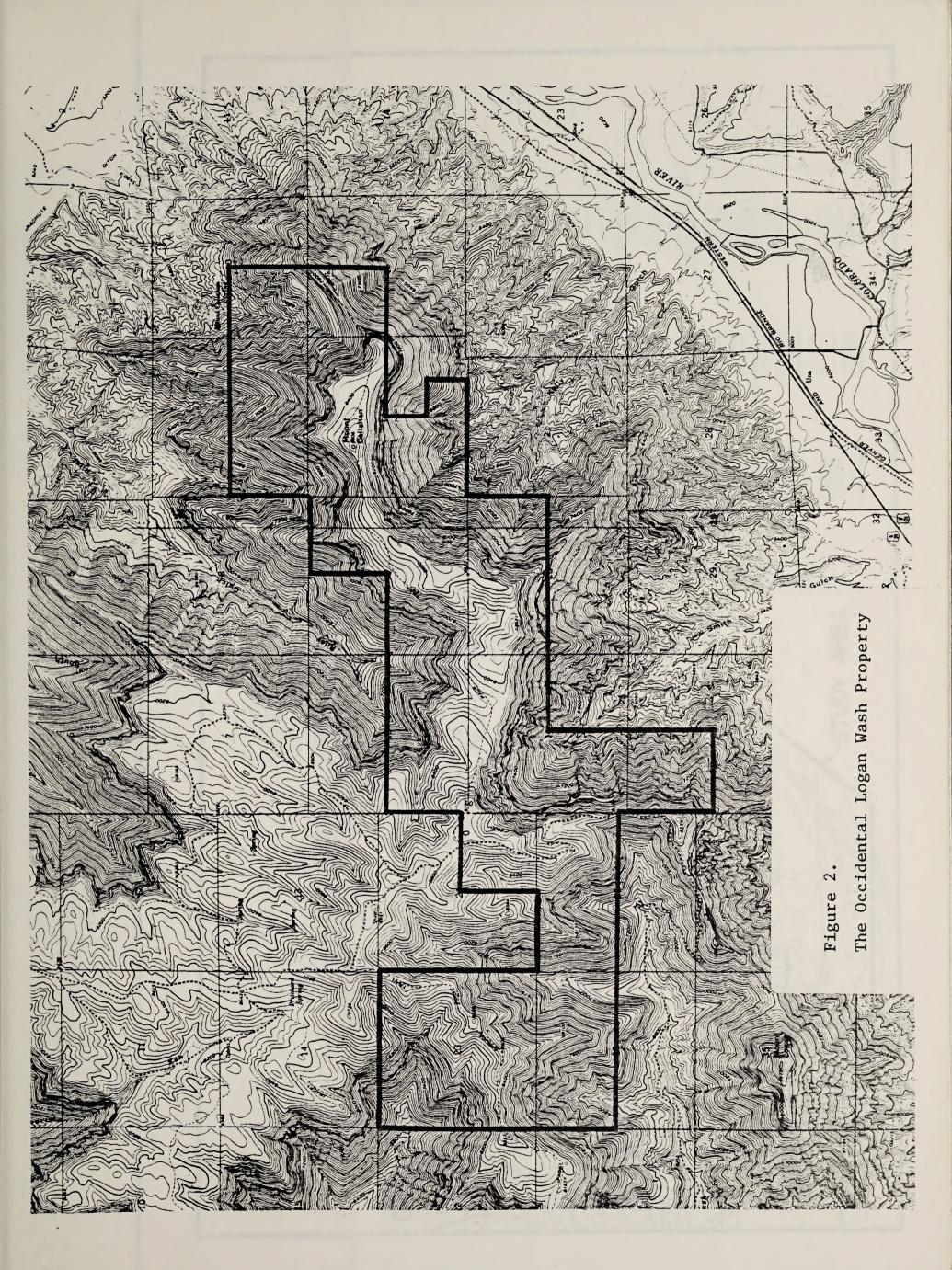
1. General

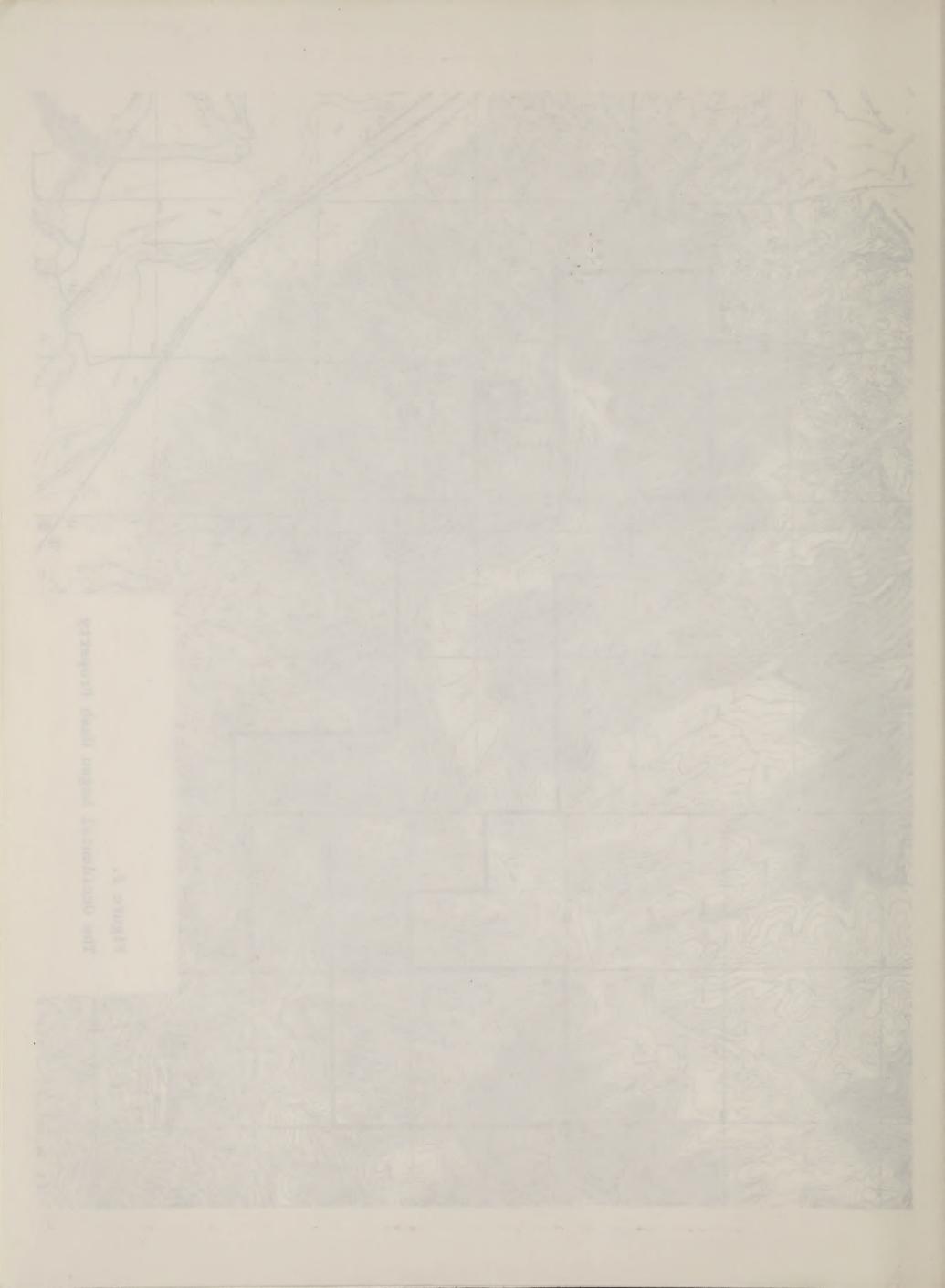
The Logan Wash site lies at the south edge of the Piceance Creek structural basin which was the site of a vast lake covering much of northwestern Colorado and northeastern Utah during the Eocene Epoch (37 to 54 million years before present). Within this crustal warp were deposited as much as 3500 feet of lake sediments consisting of near-shore sands grading laterally to silt and clay toward the center of the basin. These deposits included organic-rich layers which accumulated on the lake bottom following periods when particularly abundant plant and animal life existed in the Gradual lithification of the sediments produced the lake. sandstone, shale, and marlstone of the Green River and Uinta Formations. The organic material contained in the marlstone was converted to a solid hydrocarbon, or kerogen. The kerogen-rich marlstone is commonly called oil shale. The principal geologic formations and their subunits (or members) underlying the Logan Wash property and surrounding areas are illustrated on the Geologic Index Map, Figure 3.

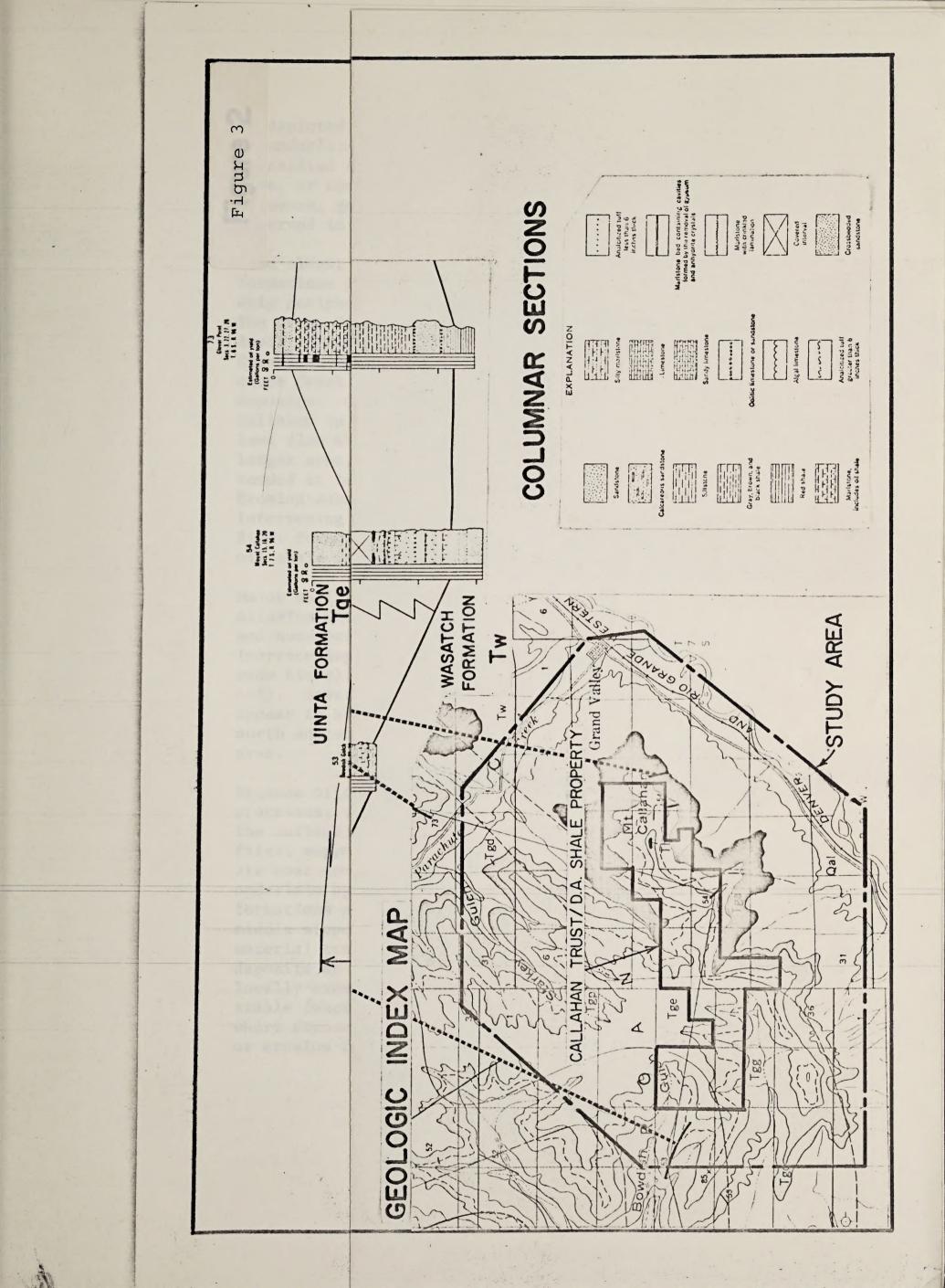
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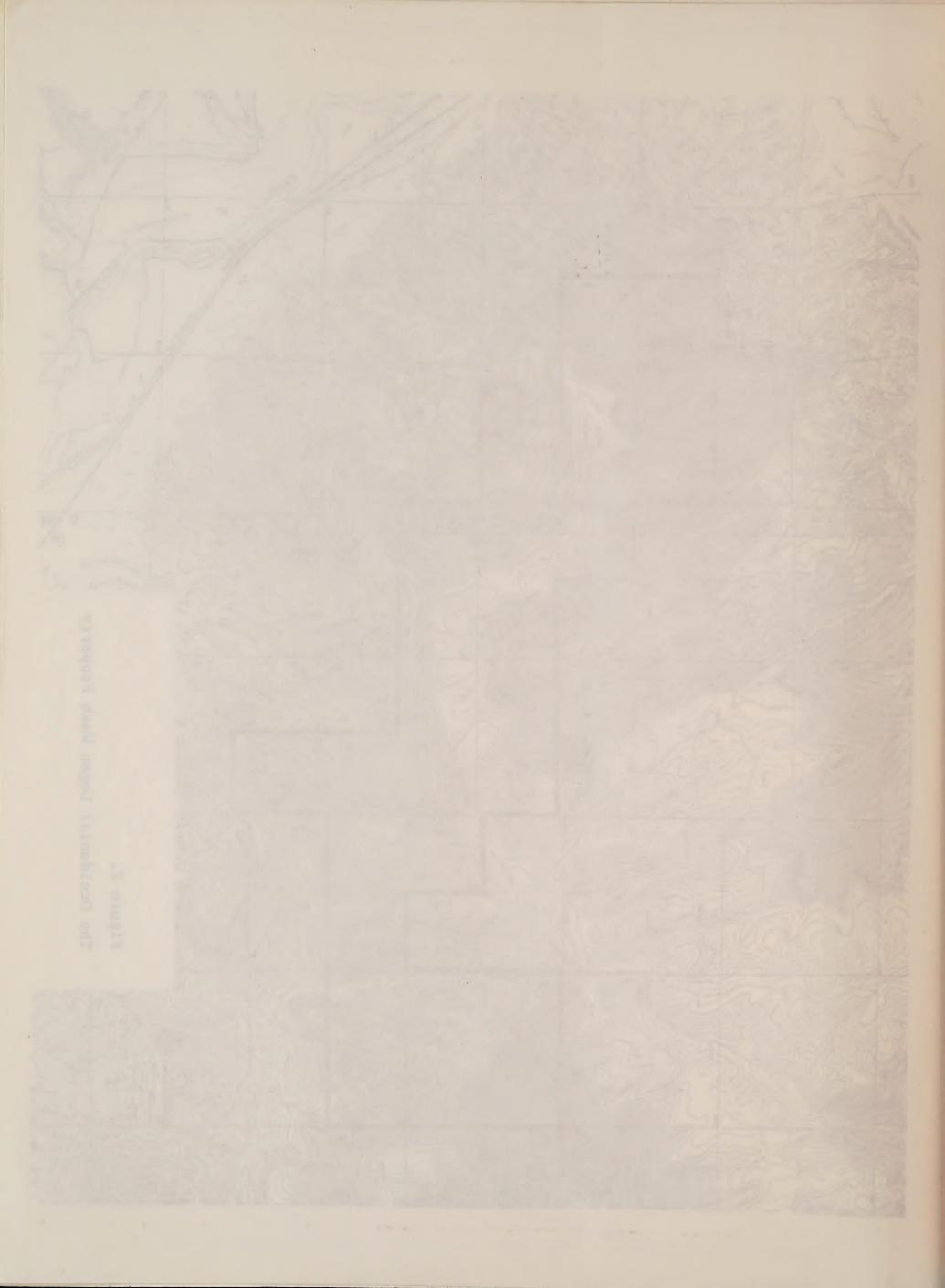


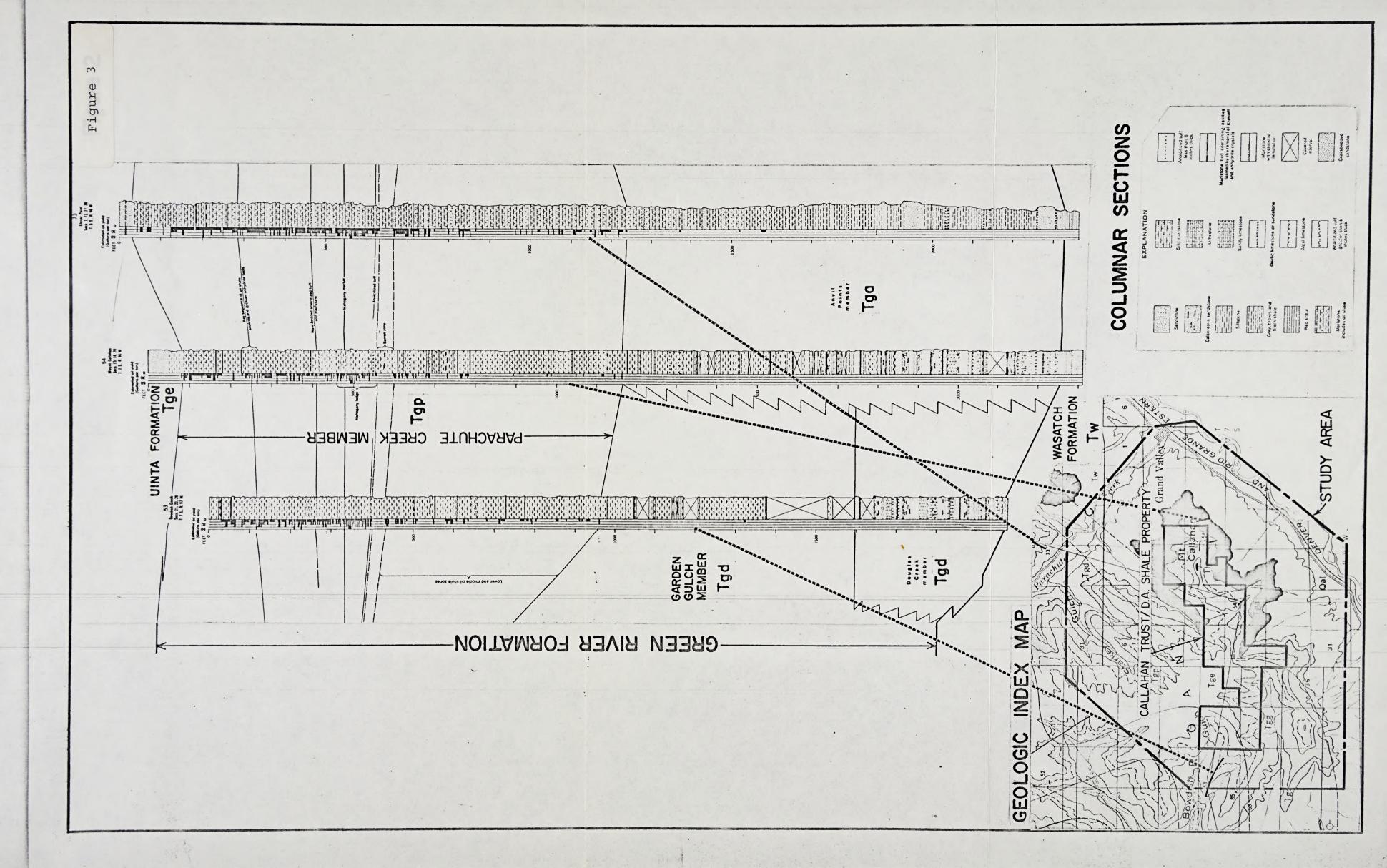


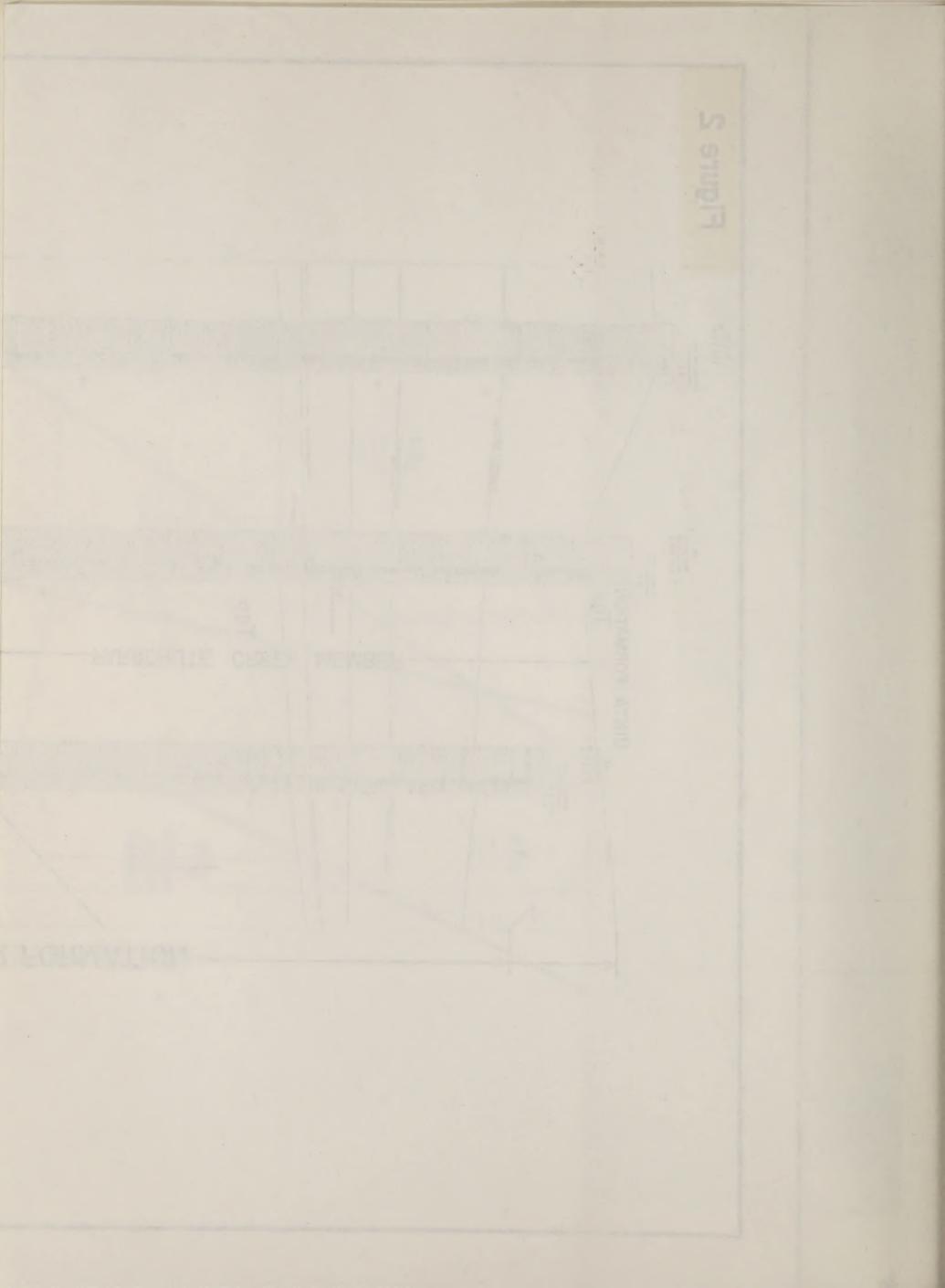












As depicted by the Geologic Index Map, the Logan Wash area is underlain by a sequence of essentially horizontally stratified sedimentary formations of Eocene age. Boundaries, or contacts between the various formations, as a consequence, generally follow the ground surface contours when observed in map view.

From oldest to youngest, and ascending in elevation, the formations include the Wasatch (at the southernly and easterly periphery of the area), the Green River, and the Uinta. The Green River Formation is further subdivided into the Anvil Points Member (which is equivalent to the Douglas Creek and Garden Gulch Members on the west), and the Parachute Creek Member containing the principal oil shale deposits. Overlying the Uinta Formation and capping Mt. Callahan in Section 16 is a small remnant of a basaltic lava flow which once undoubtedly covered a significantly larger area. It is believed to be part of a flow that extended at least to Grand Mesa about 25 miles to the south. Erosion subsequent to its formation has removed it from the intervening areas. Detailed columnar section of the Green River Formation are shown on the Geologic Index Map. The oil shale intervals are identified on the sections.

Major surficial deposits within the study area include the alluvium within the Colorado River valley, Parachute Creek, and numerous smaller valleys; remnants of older alluvium (terrace deposits on ridges about 800 feet above the Colorado River); talus deposits, slopewash, colluvium, and topsoil. Several areas of suspected ancient landslide deposits appear to affect portions of the Wasatch Formation, both north and south of the subject site but within the general area.

Because of the semi-arid climate and the normal erosional processes, very little residual soil remains in place at the surface as a result of bedrock weathering. Soil profiles, supporting varying densities and types of vegetation, are most common on north-facing slopes and those areas underlain by the more easily weathered, less resistant formations such as the Uinta and Wasatch. On the steeper middle slopes, the soil is developed from surficial rock material transported primarily by gravity and includes such deposits as colluvium, slopewash and talus. These materials, locally exceeding a depth of ten feet, can be relatively stable (where covered by vegetation) or only marginally stable, where exposed to continual creep movement, rock-fall action, or erosion from slope runoff.

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2. Mineral Resources

The mineral resource of the Logan Wash site consists of approximately 300 feet of medium to low grade oil shale and nothing else. The Occidental process can use the entire ore body, i.e. "high grading" is neither necessary nor intended by Occidental.

The mineral resources of the new site consist of several hundred feet of oil shale of varying grade and of nahcolite and dawsonite deposits of potential economic value at considerable depths below the shale. Nahcolite and dawsonite are also present to a very minor extent in the shale zones, but these latter deposits are so dispersed and represent such low overall concentrations that it is deemed uneconomic to recover them.

3. Seismic Probability

The Seismic Risk Map of the United States (U.S. Department of Commerce) includes all of Colorado within Zone 1, the lowest risk zone, on a scale ranging as high as Zone 3 (which includes California and portions of Utah, Idaho and Montana). Sites within Seismic Risk Zone 1 are subject to earthquake intensities ranging up to V and VI (Modified Mercalli Scale), which could cause minor damage to certain types of structures.

Past earthquake activity in Colorado has been in the western two-thirds, or west of the Front Range, and generally within 50 miles of the post-Oligocene-age extrusive volcanic rock areas. Refer to the Seismic Index Map, Figure 4, for the location of recorded earthquake epicenters during the period between 1880 and 1967. The largest historic earthquake was an intensity VII event occurring in 1967 near Denver. This earthquake had a Richter Magnitude of 5.3. As can be seen on the Seismic Index Map, the Logan Wash area has been relatively inactive. The epicenter closest to the site was the intensity V earthquake located approximately 40 miles east, at Glenwood Springs. Smaller, instrumentally recorded epicenters (not shown on the map) have been recorded as close as about 37 miles.

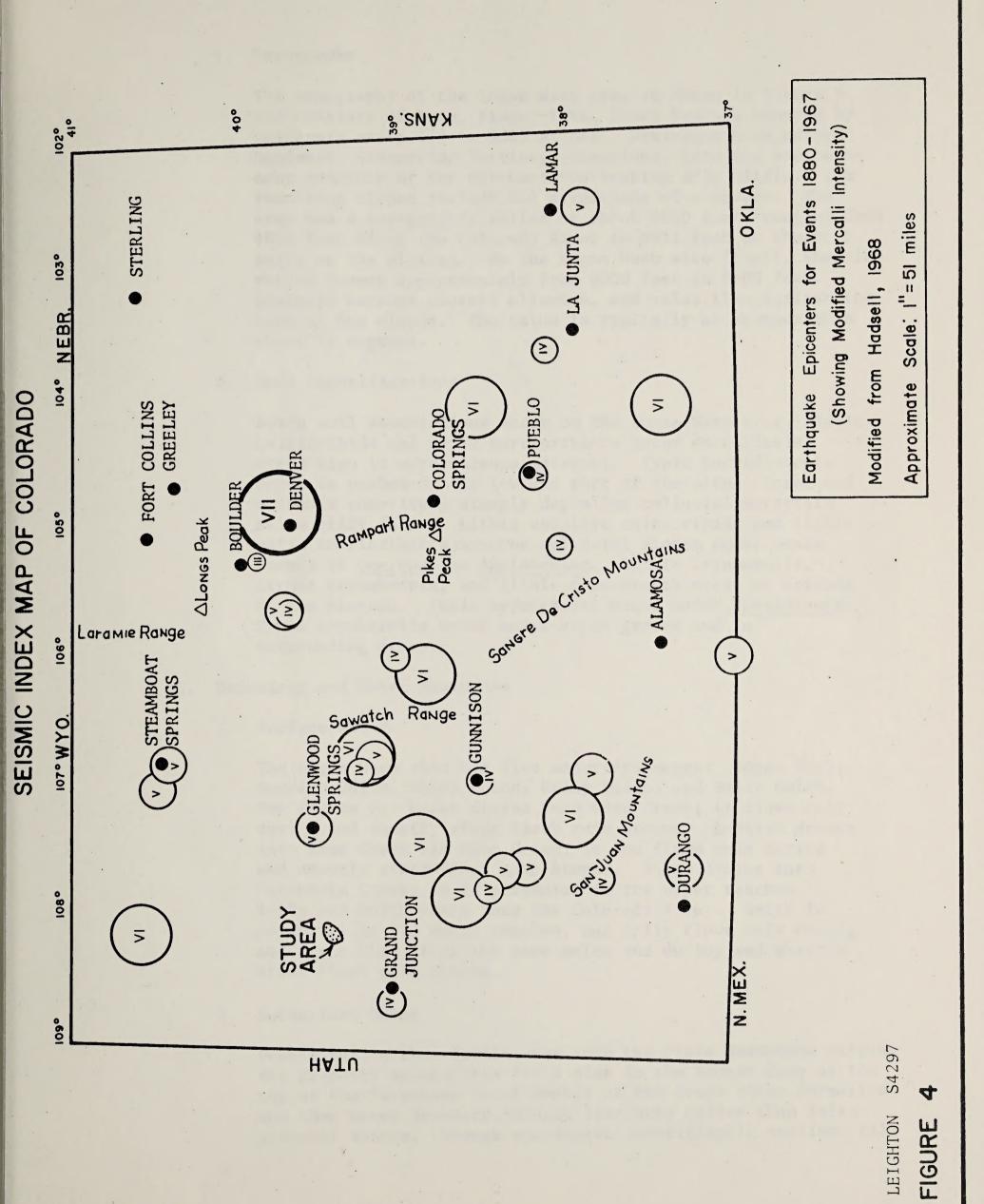
The Logan Wash area is also free of known major faults which could be sources of future seismic shaking or ground rupture risk (U.S. Geological Survey, 1959, Geological Map of Colorado). Faults have been mapped, however, as close as 10 to 15 miles south of the property, east of DeBeque Canyon.

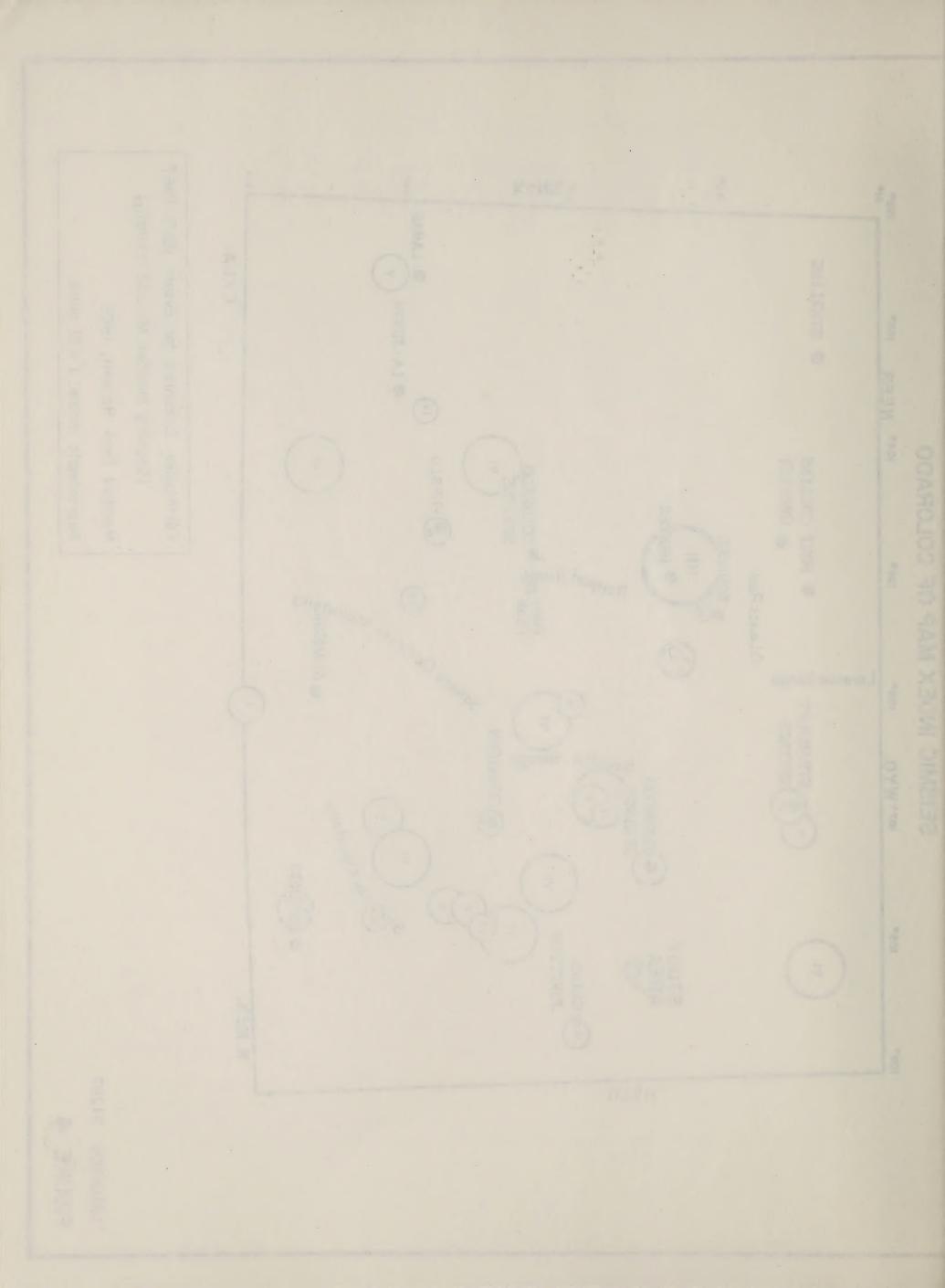
It is anticipated that earthquake intensities at the site will not exceed the historic high for the state (VII modified Mercalli) and will most likely be considerably less because of the apparent absence of major faults and nearby historic epicenters.

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4. Topography

The topography of the Logan Wash area is shown in Figure 5 and consists of long, finger-like, level benches bounded by uniformly steep (70 to 90%) slopes. Drainages have worked headward, dissecting Tertiary formations, into the southernmost remnants of the northward-retreating Roan Cliffs. The resulting slopes include all directions of exposure. The area has a topographic relief of about 4000 feet, ranging from 4890 feet along the Colorado River to 8951 feet at the high point on the plateau. On the Logan Wash site itself, the elevation ranges approximately from 6000 feet to 8600 feet. Drainage bottoms contain alluvium, and talus lies against the base of the slopes. The talus is typically no steeper than about 37 degrees.

5. Soil Classifications

Seven soil associations occur on the Logan Wash site. Typic calciorthids and typic torriorthents occur on colluvial areas high in carbonaceous material. Typic torrifluvents occur in washes on the lowland part of the site. Scree and orthents constitute steeply deposited colluvial materials below cliff faces. Lithic ustollic calciorthids and lithic ustic torriorthents occur on colluvial slopes under dense stands of <u>Quercus</u> and <u>Amelanchier</u>. Lithic cryoborolls, lithic cryumbrepts, and lithic cryochrepts occur on uplands of the plateau. Typic cryorthepts occur under <u>Pseudotsuga</u>. Typic cryoborolls occur under aspen groves and in surrounding areas.

- C. Hydrology and Water Resources
 - 1. Surface Water

The Logan Wash site has five major drainages: Logan Wash, Bowdish Gulch, Riley Gulch, Kelly Gulch, and Smith Gulch. See Figure 6. Logan drains into Roan Creek; it flows only during and shortly after flash rain storms. Bowdish drains into Roan Creek via Conn Creek; it too flows only during and shortly after flash rain storms. Riley drains into Parachute Creek; it is perennial in its upper reaches. Kelly and Smith drain into the Colorado River. Smith is perennial in its upper reaches, but Kelly flows only during and for a time after the snow melts and during and shortly after flash rain storms.

2. Subsurface Water

Precipitation that infiltrates into the Uinta Sandstone capping the property accumulates for a time in the Broken Zone at the top of the Parachute Creek Member of the Green River Formation and then moves downward, through fractures rather than intergranular spaces, through successive stratigraphic sections till

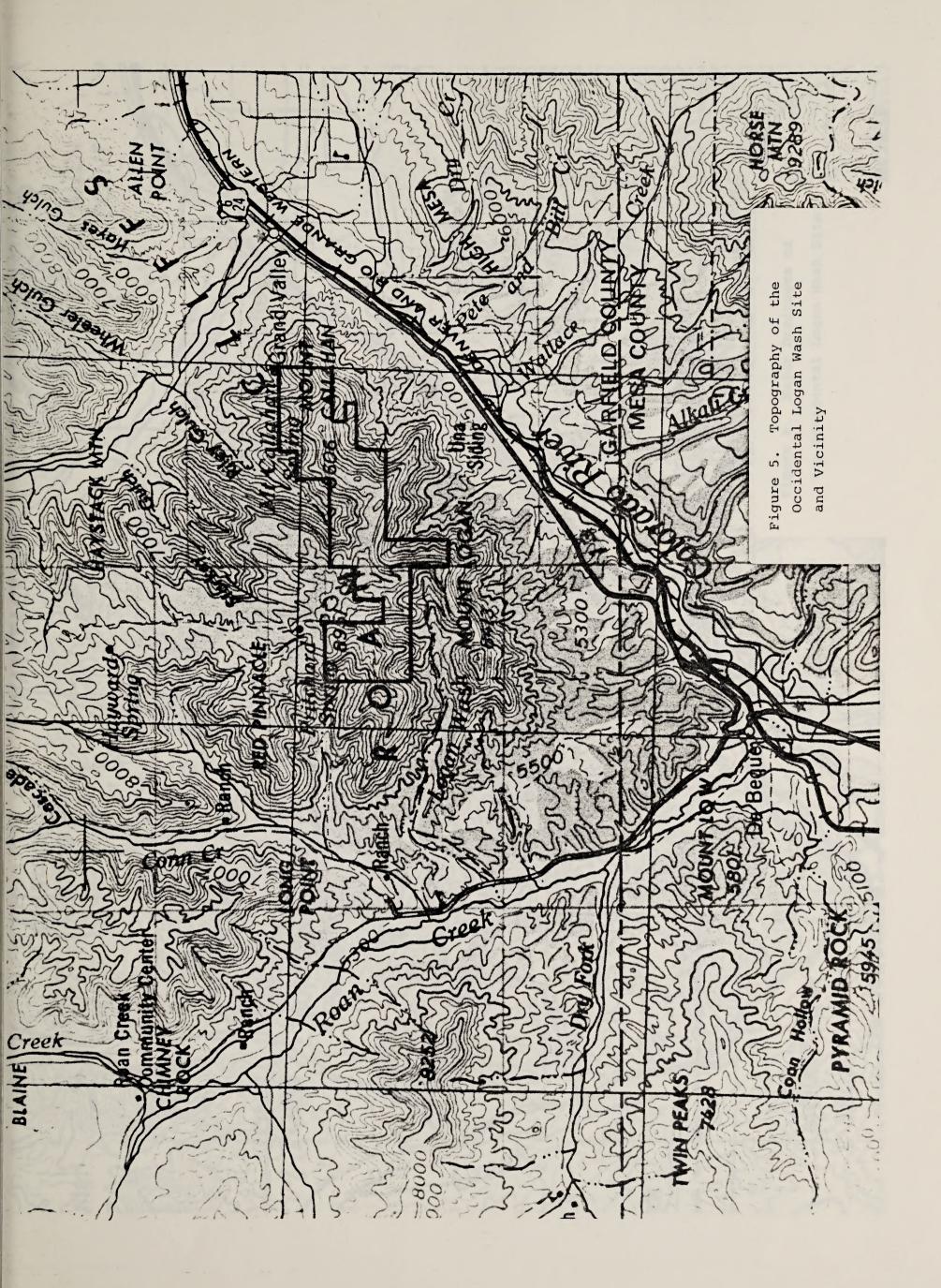
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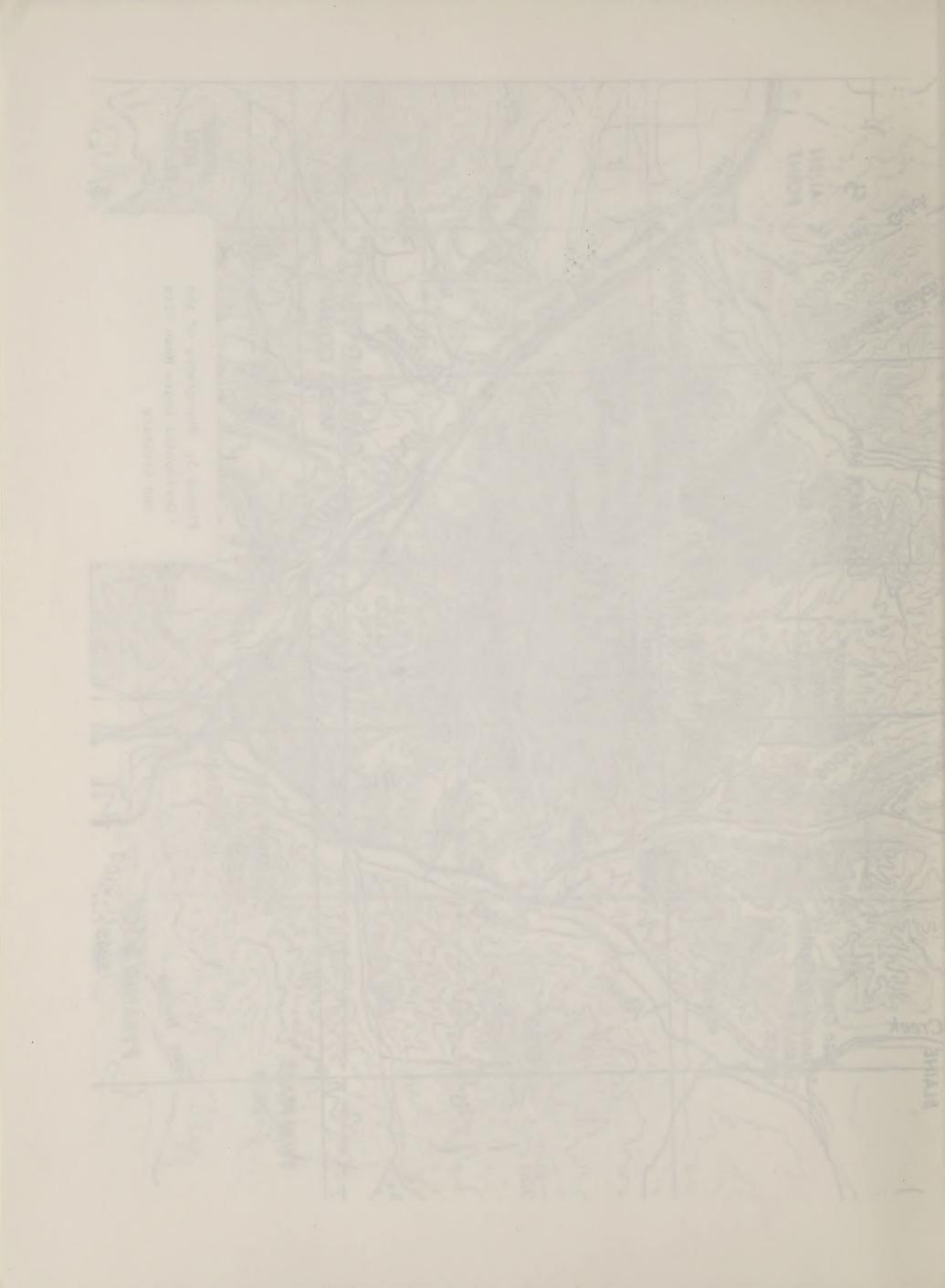
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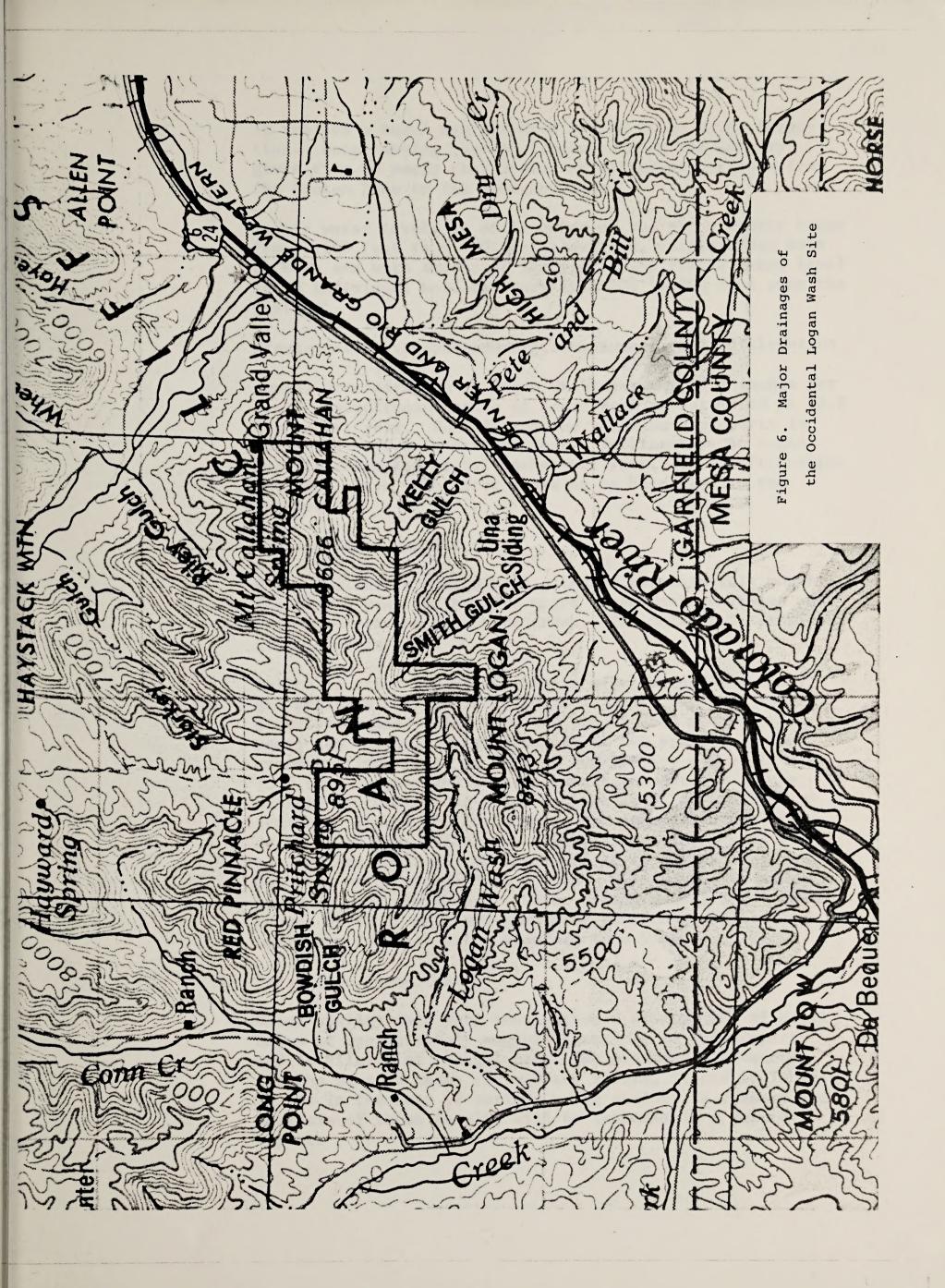
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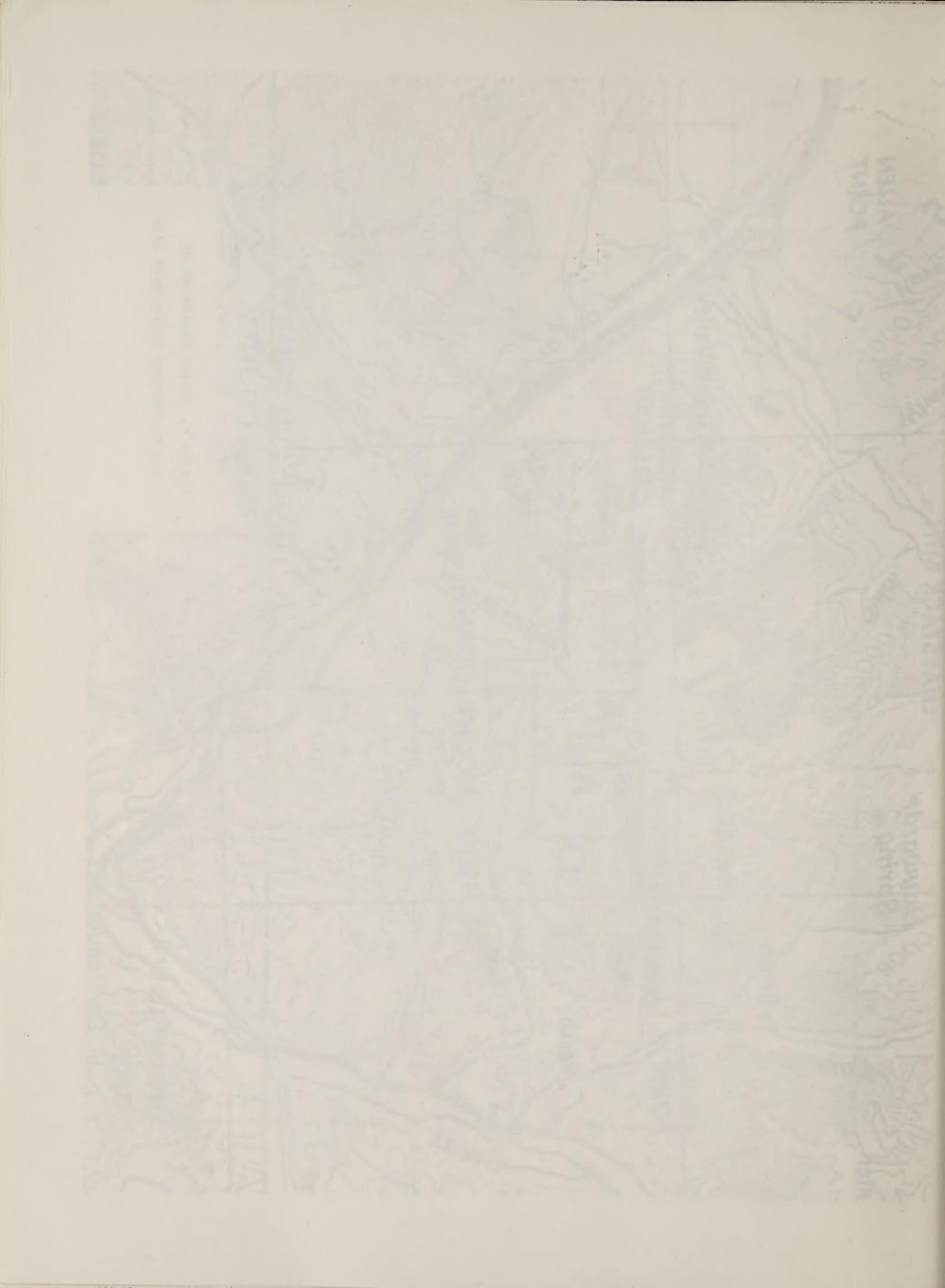
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it reaches a basal aquifer deep in the Green River Formation. Water moving through fractures near the outcorp gives rise to seeps that appear at different horizons from the Broken Zone to the Mahogany Zone.

Static water levels in drill holes on top the property range from 7,700 feet to 8,400 feet elevation, varying from hole to hole and with season of the year. The static water level in an individual hole may vary from 200 to 300 feet over the year.

3. Precipitation, Evapotranspiration, Runoff, and Infiltration

Annual precipitation at Logan Wash averages 19.2 inches per year. Evapotranspiration at logan Wash is estimated at 13.8 inches per year. Runoff from the Logan Wash property is estimated at 0.6 inches per year. Inflitration at Logan Wash is estimated at 5.2 inches per year. This infiltration includes water that later shows up as base flow in the gulches.

4. Surface Water Quality

Water quality data have been gathered approximately monthly for over a year on the five major Logan Wash drainages and on Roan Creek and Parachute Creek. The parameters examined are listed in Table 2.

Following are a few highlights; a more extensive summary and analysis will be included in a future report. Total dissolved solids range from 400 ppm to 2600 ppm over the year; the domestic water standard is 500 ppm. Chloride concentrations range as high as 100 ppm but generally are less than 20 ppm; the domestic water standard is 27 ppm. Sulfate concentrations range as high as 1,700 ppm but are generally around 300 to 600 ppm; the domestic water standard is 250 ppm. Nitrate concentrations range up to 19 ppm and are generally of the order of 10 ppm or less; the domestic water standard is 45 ppm. Oil and grease range up to 26 ppm; the domestic water standard is 2 ppm. BOD5 ranges up to 66 mg/l and generally runs about 20 to 30 mg/l; the domestic water standard is 0.5 ppm.

5. Subsurface Water Quality

Water quality data have been gathered at a number of drill holes at approximately monthly intervals on the property and in alluvia of the gulches. The parameters measured are the same as those for surface waters, listed in Table 2. As in the case of surface water quality, a summary and analysis of these results will be included in a future report. time seath set hands agus he taup in the new press for and time War a wordag through frateistes set the automost of any pires to seeps that appear at 1/122200 morising from the frequent form to the the borgens form

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Table 2

Water Quality Parameters

Pesticides (Chlorinated), µg/1 Color, Platinum Cobalt Scale Specific Conductance, umhos Turbidity, FTU pH Total Alkalinity, mg/1 CaCO3 Bicarbonate, mg/1 CaCO₃ Total Organic Carbon, mg/1 Suspended Solids, mg/1 Soluble Solids, mg/l Volatile Solids, mg/1 Sulfate (SO_4) , mg/1 Hardness, mg/1 CaCO3 Chloride, mg/l Fluoride, mg/1 Chemical Oxygen Demand, mg/1 Odor, ASTM OII Fecal Coliform Bacteria, colonies/100 ml Phenol, mg/1 Phosphorus, mg/1 Sulfite (SO_3) , mg/1 Bromide, mg/1 Nitrogen-Kjeldahl, mg/l Nitrogen-Ammonium, mg/1 Nitrate, mg/1 BOD_5 , mg/1 Oil and Grease, mg/l Sulfide, mg/1 Nitrite, mg/1 Cyanide, mg/1 Surfactants, mg/1 Silicon, mg/1 Lithium, mg/1 Sodium, mg/1

Potassium, mg/1 Arsenic, mg/l Selenium, mg/1 Mercury, mg/1 Cadmium, mg/l Zinc, mg/1 Iron, mg/1 Magnesium, mg/1 Calcium, mg/1 Boron, mg/1 Thallium, mg/1 Chromium, mg/1 Vanadium, mg/1 Cobalt, mg/1 Nickel, mg/1 Strontium, mg/1 Copper, mg/1Barium, mg/1 Manganese, mg/1Silver, mg/1Zirconium, mg/1 Titanium, mg/1 Molybdenum, mg/1 Antimony, mg/1 Tin, mg/1Gallium, mg/1 Lead, mg/1Aluminum, mg/1 Beryllium, mg/1 Yttrium, mg/1 Scandium, mg/1 α , pCurie/1 β , pCurie/1 Radium 226, pCurie/1

D. Meteorology

1. Climate

The climate at Logan Wash is semi-arid with six to twenty inches of precipitation annually, depending upon elevation and topography. Temperatures range from about -20° F to $+90^{\circ}$ F.

2. Surface Meteorology

South and southwest winds occur approximately 50% of the time in all seasons of the year. The next most frequent wind directions are from the north and north-northwest; these directions occur approximately 20% of the time in all seasons. The average wind speed in all seasons is about 13 mph (11.5 knots), with wind speeds under 3.5 mph (3 knots) occurring less than 3% of the time.

3. Upper Air Meteorology

Early morning and late afternoon rawinsonde flights generally show near-neutral or unstable thermal stratification with moderate-to-strong wind speeds in the first three thousand feet above the elevation of Mt. Callahan. Data were taken twice daily for one year. Upper-air wind and temperature data show good agreement with concurrent observations obtained at corresponding altitudes at Grand Junction, Colorado.

Strong surface temperature inversions almost never occur at Mt. Callahan. Measurements at Mt. Callahan of the temperature difference between the top and base of the 100 ft. tower, obtained as part of the hourly surface observation program, show that the temperature at the top of the tower exceeds the temperature at the tower base by 1.5°C or more about 17% of the time. However, positive temperature differences larger than 2.5° occurred only 0.5% of the time and there is only one case in which such differences persisted for more than three hours.

4. Normality of Measurement Period

The surface and upper air observations obtained during the one-year observation period at Mt. Callahan show that high dilution/dispersion conditions are present throughout the year. There is an almost complete absence of both calms and persistent strong temperature inversions typically present at lower elevations. The year of record at Mt. Callahan seems to be typical.

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E. Societal Considerations

1. Community Populations and Characteristics

The overwhelming majority of Occidental employees have one of seven towns as their mailing addresses. The towns, all lying along the Colorado River and within an hour's drive of the mine or the office, are Fruita, Grand Junction, Clifton, Palisade, DeBeque, Grand Valley, and Rifle; see Figure 1. Since Occidental began operations at Logan Wash in mid-1972, the number of employees not living in these towns has averaged only eight to nine and has never exceeded twenty-eight. The number of employees claiming one of these towns as a mailing address has always totaled at least eighty-seven percent of the Occidental work force.

Fruita is a town of about 2000 people ten miles northwest of Grand Junction, just north of the Colorado River and Interstate Highway 70. The census tracts centered on Fruita have a population of about 6000. The community has a downtown area with a range of services, but much of the trade goes to Grand Junction. Many of the town's residents work in Grand Junction.

Grand Junction, located 51 miles by road southwest of the mine, is the county seat of Mesa County. With a population of about 27,000, it is the largest city in western Colorado. It is thus a regional commercial and service center for the Western Slope. The immediately surrounding population, when added to Grand Junction's own population, results in a total of about 60,000 people in the area. This latter figure includes the populations of Fruita, Clifton, and Palisade. The nearest larger communities are Provo, Utah, and Denver, Colorado, approximately 230 to 250 miles away.

Clifton is an unincorporated area seven miles east of Grand Junction. The census tracts centered on Clifton have a population of about 3500 to 4000. The community is less selfsufficient than Fruita and its residents rely heavily on Grand Junction for goods and services.

Palisade is a town of about 1000 people thirteen miles east of Grand Junction, lying between the Colorado River and Interstate Highway 70. The census tracts centered on Palisade have a population of about 2000. The town is part of the Grand Junction economy, with a downtown geared mostly to needs that are more neighborhood than regional in character.

DeBeque is a town of about 325 people in northern Mesa County, near the Garfield County line. It lies just east of Roan Creek and north of the Colorado River and Highways 6 and 24 and future Interstate Highway 70. The town is the most accessible community to Occidental's Logan Wash site, twelve miles by road to the north and east. It is 39 miles east of

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Grand Junction. The town has minimal commerce and no professional services. Many of the town's residents commute to Grand Junction and Rifle for work; others, of course, work at the Occidental mine. The school district serving the town includes parts of both Mesa and Garfield Counties.

Grand Valley is a town of about 500 people 53 miles east of Grand Junction. The census tracts centered on Grand Valley have a population of perhaps 1000 to 1200. The town lies along the Colorado River on Highways 6 and 24 and future Interstate Highway 70, six and a half miles north and east of the Logan Wash site. The distance to the site by road, however, is 26 miles. A limited business district exists but not professional services. Most local citizens trade in Rifle or Grand Junction.

Rifle is a town of about 2750 people 69 miles east of Grand Junction. The census tracts centered on Rifle have a population of about 4000. The town lies on Interstate Highway 70 and Highway 13, making it a convenient business and service center for the surrounding area. The town provides retail shopping, medical and other professional services, a courtroom, and a hospital.

2. Development Trends

a. Fruita, Grand Junction, Clifton, and Palisade

It has not often been practical to obtain data on the growth of amenities and services in the individual communities of Fruita, Grand Junction, Clifton, and Palisade. These communities are, however, over fifty miles from the mine site and within thirteen miles of their own local population center. Thus, from the perspective of the mine, the four towns appear as a single population center and are treated as such.

Even as a group, it was difficult to obtain some data. However, these communities and their immediate environs contain over 90% of the population of Mesa County. Mesa County statistics were therefore used as a proxy for the towns' statistics.

Compound annual growth rates of population and number of households; employment and business payroll; assessed valuation; elementary and secondary school enrollment; social service caseloads; physicians, dentists, and lawyers in private practice; municipal court traffic cases and county court civil and criminal cases; accidents investigated, speeding tickets issued, and penalty assessment tickets issued by the State Patrol; and fire calls answered in the city and rural fire district for the period 1972 through 1975 are listed in Table 3. Constructions and a second of the second of

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Table 3

Annual Growth Rates in Mesa County, Colorado, 1972-1975

	Annual Growth Rate	<u> 1975 Value</u>
Population	2.6%	61,500
Number of Households	2.8%	20,241
Employment, Non-Agricultural	8.1%	23,470 ¹
Business Payroll, 1967 dollars	9.1%	$15, 123, 000^2$
Assessed Valuation, 1967 dollars	1.1%	64,879,000
Elementary School Enrollment, District 51 ³	2.5%	6,593
Elementary School Enrollment, Grand Junction and Clifton	5.8%	5,765
Secondary School Enrollment, District 51 ³	1.6%	6,870
Secondary School Enrollment, Grand Junction and Clifton	4.8%	5,491
Social Services Caseload	-4.9%	4,202
Physicians in Private Practice ⁴	5.2%	92
Dentists in Private Practice ⁴	4.6%	32
Lawyers in Private Practice ⁴	5.3%	70
Municipal Court Traffic Cases	13.3%	5,595
County Court Civil Cases	6.8%	907
County Court Criminal Cases	4.4%	3,856
Accidents Investigated by State Patrol	10.7%	1,265
Speeding Tickets Issued by State Patrol	12.1%	2,803
Penalty Assessment Tickets Issued by State Patrol	11.0%	4,624
Fire Calls ⁵	5.7%	659

¹1974 value.

²1973 value.

³School District 51 includes Fruita, Grand Junction, Clifton and Palisade and excludes Collbran and DeBeque.

⁴Excludes Collbran and DeBeque.

⁵Grand Junction City and Rural Fire District.

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b. DeBeque

Compound annual growth rates or population, assessed valuation, and school enrollment for DeBeque for the period 1972 through 1975 are listed in Table 4.

c. Grand Valley

Compound annual growth rates of population, assessed valuation, school enrollment, and social service caseload for Grand Valley for the period 1972 through 1975 are listed in Table 5.

d. Rifle

Compound annual growth rates of population; residential building permits; assessed valuations; school enrollments; social service caseloads; physicians, dentists, and lawyers in private practice; and municipal court traffic cases and county court civil and criminal cases for Rifle for the period 1972 through 1975 are listed in Table 6.

3. Land

a. Ownership

The ownership of land immediately surrounding the Logan-Wash site is shown in Figure 7. The owners are the United States Government, several oil companies, and other private interests.

b. Land Use

The Logan Wash site is used for summer range by cattle. It has no other use. Except for a small amount of land that is needed for surface facilities, the surface is not disturbed or altered. Significant new surface construction is not contemplated, and the land may continue to be used for grazing during the proposed program.

4. Water Use

The Logan Wash site is not a source of surface water for any domestic or industrial use. Springs and streams serve wildlife and cattle. No change in the use of surface water is envisioned.

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Table 4

Annual Growth Rates in DeBeque, Colorado, 1972-1975

	Annual Growth Rate	1975 Value
Population	17.9%	325
Assessed Valuation, Residential, 1967 dollars	23.3%	986
Assessed Valuation, Total, 1967 dollars ¹	-8.01%	$1,810,000^2$
Assessed Valuation, Total, 1967 dollars ³	-1.01%	115,000
Public School Enrollment	8.1%	151

¹Garfield County part of the DeBeque School District, JT-49. ²1974 value.

³Mesa County part of the DeBeque School District, JT-49.



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Table 5

Annual Growth Rates in Grand Valley, Colorado, 1972-1975

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	Annual Growth Rate	<u> 1975 Value</u>
Population	13.1%	500
Residential Assessed Valuation, School District, 1967 Dollars	24.2%	344,000
Total Assessed Valuation, School District, 1967 Dollars	-4.6%	2,019,000 ¹
Total Assessed Valuation, Town, 1967 Dollars	2.4%	294,000 ¹
Elementary School Enrollment	5.0%	95
Secondary School Enrollment	22.1%	· 82
Total School Enrollment	9.0%	177
Social Services Caseload	-4.6%	58

¹1974 value.

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Table 6

Annual Growth Rates in Rifle, Colorado, 1972-1975

	Annual Growth Rate	<u> 1975 Value</u>
Population, Town	10.5%	2,750
Population, Urban Area	11.0%	4,870 (est.)
Single Family Building Permits	140.0%	23
Total Residential Building Permits, No. of Units	169.0%	29
Residential Assessed Valuation, 1967 Dollars	47.3%	3,321,000
Total Assessed Valuation, School District, 1967 Dollars	-4.4%	9,843,000 ¹
Total Assessed Valuation, Town, 1967 Dollars	-1.5%	$2,766,000^{1}$
Elementary School Enrollment	5.7%	851
Secondary School Enrollment	6.9%	720
Total School Enrollment	6.6%	1,571
Social Service Caseload	4.9%	257
Physicians in Private Practice	18.6%	5
Dentists in Private Practice	35.8%	2.5
Lawyers in Private Practice	25.7%	5
Municipal Court Traffic Cases	11.0%	423
County Court Civil Cases	16.2%	48
County Court Criminal Cases	48.0% ²	65

¹1974 value.

²The trend in criminal court cases is not stable and 48% is at best a crude estimate of the recent history.

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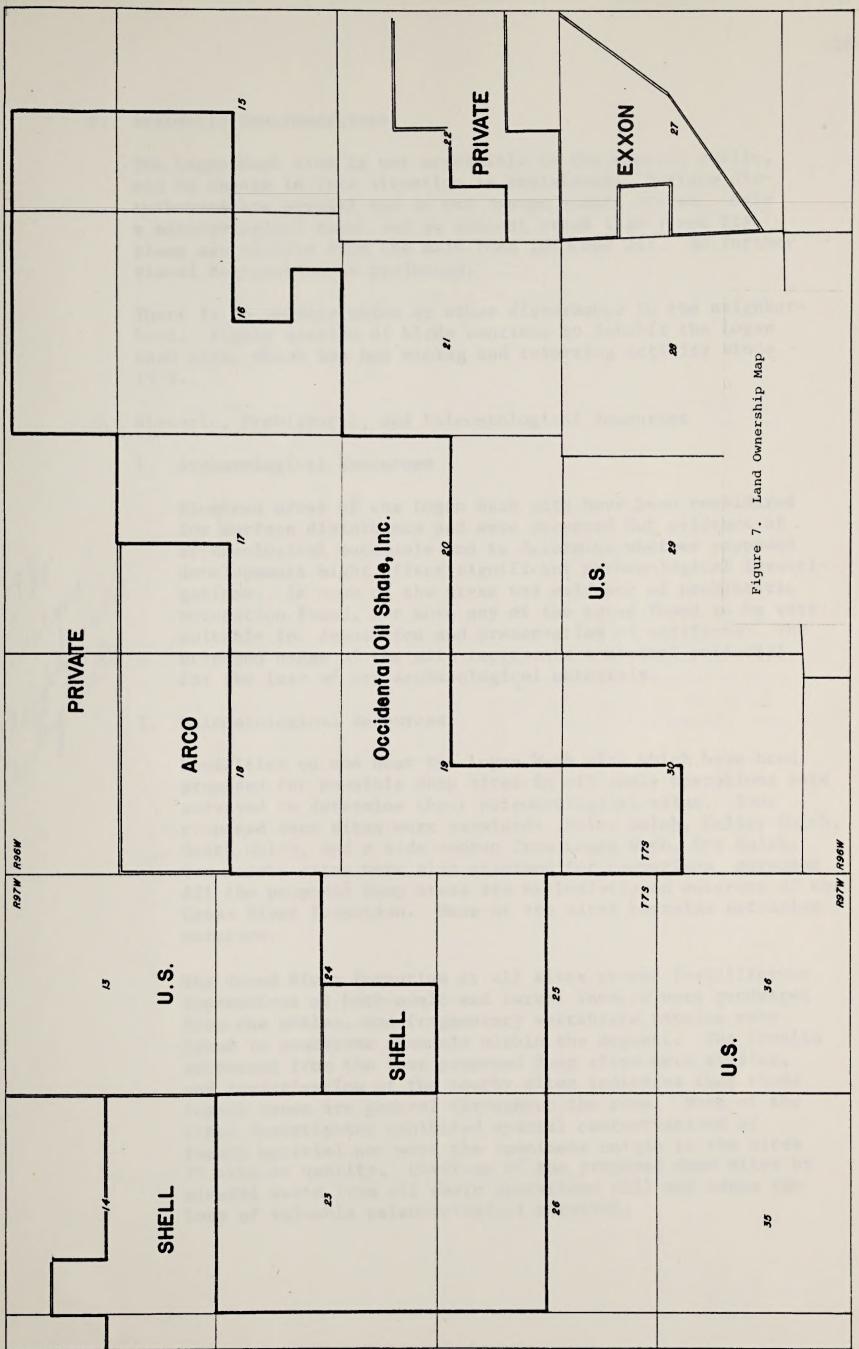
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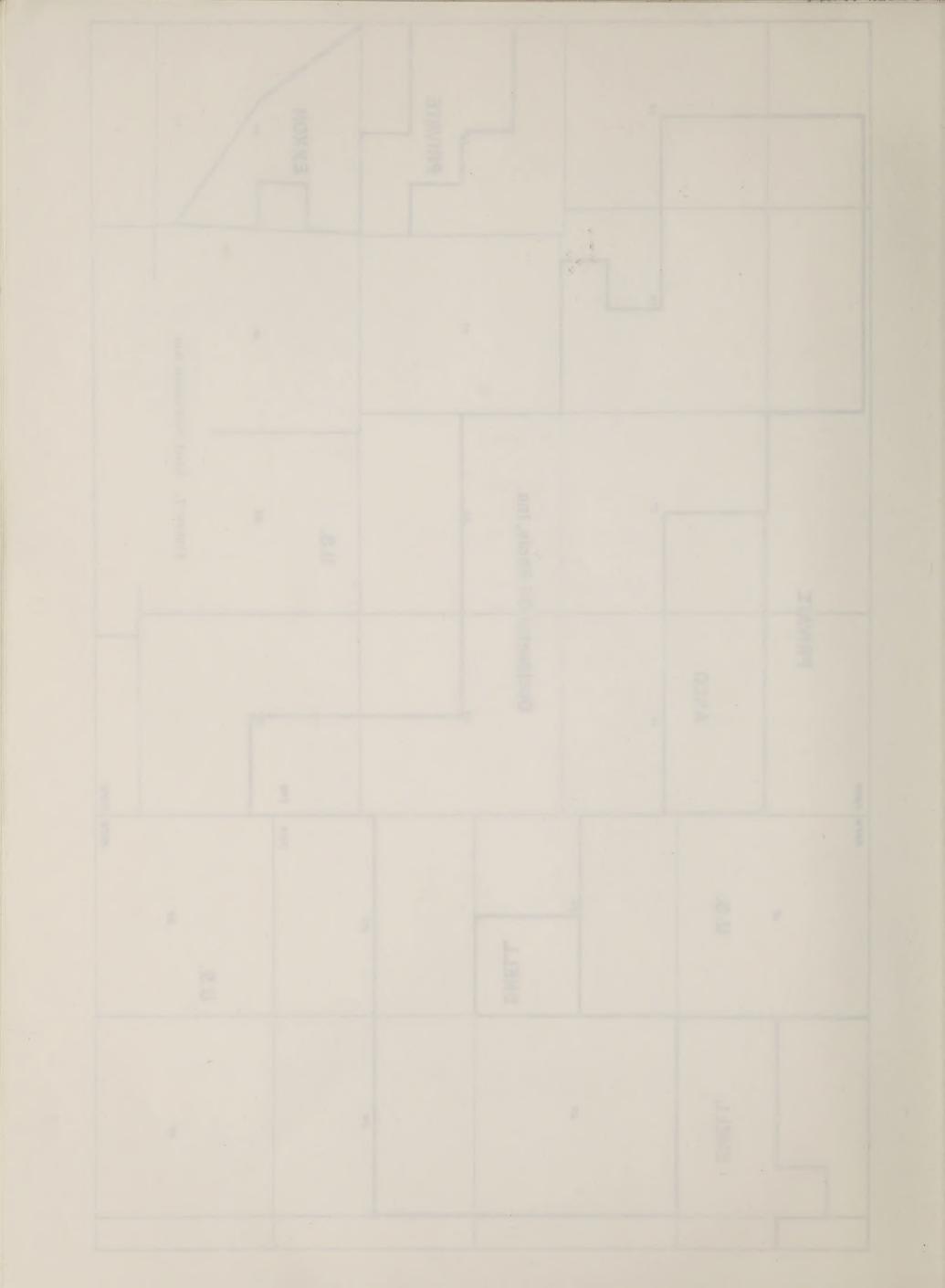
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F. Aesthetic Considerations

The Logan Wash site is not accessible to the general public, and no change in this situation is envisioned. Surface disturbances are minimal and do not damage scenic vistas. Only a meteorological tower and an exhaust stack (130') and its plume are visible from the main road (US 6 and 24). No further visual degradation is projected.

There is no serious noise or other disturbance to the neighborhood. Eighty species of birds continue to inhabit the Logan Wash site, which has had mining and retorting activity since 1972.

G. Historic, Prehistoric, and Paleontological Resources

1. Archaeological Resources

Nineteen areas of the Logan Wash site have been considered for surface disturbance and were surveyed for evidence of archaeological materials and to determine whether proposed developments might affect significant archaeological investigations. In none of the areas was evidence of prehistoric occupation found, nor were any of the areas found to be very suitable for deposition and preservation of artifacts. The proposed usage of the site represents a minimal potential for the loss of any archaeological materials.

An archaeoic developments Mis gations. In none of c. occupation found, nor were suitable for deposition and proposed usage of the site for the loss of any archae Paleontological Resources Localities on and near the proposed for possible dump surveyed to determine the dump sites were

Localities on and near the Logan Wash site which have been proposed for possible dump sites in oil shale operations were surveyed to determine their paleontological value. Four proposed dump sites were examined: Riley Gulch, Kelley Gulch, Smith Gulch, and a side canyon from Logan Wash, Dry Gulch. Two nearby sites were also examined for comparison purposes All the proposed dump areas are exclusively on outcrops of the Green River Formation. None of the sites contains extensive outcrops.

The Green River Formation at all sites proved fossiliferous. Impressions of both adult and larval insects were recovered from the shales, and fragmentary vertebrate remains were found in sandstone channels within the deposit. The fossils recovered from the four proposed dump sites were similar, and investigation of the nearby sites indicates that these fossil types are general throughout the area. None of the sites investigated exhibited special concentrations of fossil material nor were the specimens unique to the sites in type or quality. Coverage of the proposed dump sites by mineral waste from oil shale operations will not cause the loss of valuable paleontological material.

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H. Political Considerations

Prior surveys of residents and local public officials indicate that people in the area of the Logan Wash site generally favor an experimental oil shale development that provides jobs and income and that does not have a significant adverse impact on the physical environment.¹ Feelings about population growth and its consequences vary. Occidental, however, does not contemplate adding personnel for the proposed project, thereby making the latter point moot.

I. Economic Environment

The proposed project will be a continuation of an existing operation, and growth in employment is not contemplated. New employees will not be imported. Land now in agriculture will not be removed from agriculture by the project.

The average annual wage of Occidental employees is \$13,266. Average annual wages in Mesa and Garfield Counties are \$7,218 and \$7,480, respectively (all in 1975 dollars).

During the time that Occidental has been active at Logan Wash, i.e. since mid-1972, social service caseloads have declined at annual rates of 4.6% in Grand Valley and 4.9% in Mesa County. There appear to be no social service cases in DeBeque for public assistance or food stamps. Rifle shows an increase of 4.9% p.a. in social service caseload, but it is only half of the 10.5% p.a. growth rate of the population. Further, Occidental employees represent a zero net influx into Rifle.

J. Institutional Considerations

Refer to the Appendix for a listing of relevant regulations and responsibilities to local, state, and federal government.

- K. Biological Environment
 - 1. Flora

One hundred eighty-four species of vascular plants were recorded on the Logan Wash property. These include 7 trees, 25 shrubs, 16 grasses, 134 forbs, and 2 succulents. Five grasses and two forbs could not be identified. Ninety-one percent of the plant species are native to the site. There are ten vegetation communities on and near the site. The vegetation is typical of the Roan Cliffs.

¹C-b Shale Oil Project, Socio-Economic Assessment, Section IX (1976).

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2. Vegetation Potential

Experiments are underway to determine how best to vegetate raw mineral waste. Results to date indicate that it is possible to vegetate raw shale with little difficulty. Spent shale is not brought to the surface and does not need to be vegetated.

3. Fauna

Twenty-five species of mammals, eighty species of birds, and seven species of reptiles have been recorded at the Logan Wash site. No fish or amphibians have been noted. Included among the mammals are fifteen rodent species and seven carnivore species. The reptiles include three snake species and four lizard species. The distribution of species according to habitat has been recorded for four seasons of the year.

4. Threatened and Endangered Plants and Animals

a. Plants

One species found on the Logan Wash site, <u>Astragulus</u> <u>lutosus</u>, is classified "endangered." It has been found to be fairly abundant on steep scree-colluvial slopes of the Green River Formation, where lack of access and dangerous topography probably inhibited previous discovery.

A new record is <u>festuca</u> <u>dasyclada</u>, which was listed as "possibly extinct." <u>Festuca</u> <u>dasyclada</u> has been found to occur throughout Garfield County, Colorado, on steep, xeric scree-colluvial slopes at the contact of the Upper Parachute Creek Member of the Green River Formation and the Uinta Sandstone Formation.

b. Animals

There appears to be no rare or endangered animal species residing on the Logan Wash property or immediate environs. Prairie and Peregrine Falcons have been sighted over the area, but detailed studies have shown neither to be nesting there.

L. Facilities

No increase in Occidental employment at Logan Wash is contemplated for the proposed project. Consequently, there will be no new demand for housing, schools, public health facilities, recreation facilities, or points of interest as a result of the project.

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Utilities adequate to serve the project itself are already installed. No new demands are projected.

Transportation to and from the site is and will continue to be by motor vehicle. Supplies and product oil are trucked. Personnel travel by personal vehicles and car pools. No increase in transportation service is envisioned during the project.

Public safety manpower and equipment requirements will not be affected by the proposed project. As mentioned above, there will be no increases in motor vehicle travel or population to give rise to an increased need for public safety manpower or equipment.

III. Potential Environmental Impacts

A. Construction Phase

No new surface construction is contemplated at the Logan Wash site. Consequently, there will be no environmental impacts associated with such activities.

- B. Operational Phase
 - 1. Effects on Water

A study of the hydrology of the Logan Wash site is underway and will be continued during the proposed project as part of the environmental research plan. The objective of the study is to develop an accurate model of the existing surface and subsurface hydrologic system (water balance) so that the effect on the environment of any mining, retorting, and waste disposal activity can be predicted and adequately monitored. A water balance for the operations is also being developed.

Drill holes extending 800 feet below the surface to the lower reaches of the ore are being used to obtain water quality samples monthly and to measure water level seasonally. Slug tests have been made in three locations on the plateau in the upper Green River formation to measure transmissibilities and storage constants. The Green River formation below the ore is being monitored, at the elevation of the mineral waste pile. Observation wells in the alluvia of nearby gulches are being monitored seasonally. Streams carrying runoff from the property are being studied in terms of maximum flow, seasonal water quality, and actual seasonal flow.

Water depth will be monitored monthly and water quality will be monitored seasonally in existing wells during the project. Additional holes may be monitored to determine the extent of any changes if the holes in the immediate vicinity of the The large and have been and a strain of the light of the all wants

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mine show significant effects. Stream gauging and seasonal water quality monitoring will be continued during the project. Present flume installations will be improved in light of recent storm data. An evaporation pan is being installed and a lysimeter is being considered.

Water quality will be analyzed during the project according to a list containing approximately half the parameters listed in Table 2. The exact list has not yet been determined. The purpose in shortening the list is to allow more samples to be monitored without increasing the cost of the analysis program. These data will be used to identify any adverse effects that require corrective action.

From time to time, slightly more water is produced than is needed for current activities. The sources of water are mine water and water produced in retorting. There is also process water, which is either mine water or retort water that has subsequently been used in the process. Much of the excess is contained in underground sumps in the mine for later use. Any residual excess is evaporated on the surface of the mineral waste disposal pile in such a way that neither surface nor subsurface waters are degraded. This approach was developed in consultation with the Water Quality Control Division of the Colorado Department of Health, and the procudure will be continued during the proposed project.

There are no adverse impacts on water apparent which cannot be avoided. Monitoring of wells, surface streams, and the rock near underground oil and water sumps will be used to assure that this condition indeed exists.

Leaching of spent retorts and contamination of ground water is a possible long-term effect which will be mitigated. Isolation of the shale, diversion of potential leachate, and deliberate leaching of soluble salts are possible ways to prevent long-term leaching. Retort data indicate that deliberate leaching is indeed a viable possibility, and laboratory leaching studies are now underway to determine optimum amounts of water and time required. The studies will be extended to retort experiments if the laboratory results are favorable. Isolation of spent shale and diversion of potential leachate will also be considered as alternative means of controlling ground water pollution from spent shale retorts.

No beneficial impacts on the hydrology are envisioned.

2. Effects on Land

Refer to Figures 6, 8, and 9 for maps and photographs of the Logan Wash area. Note the mineral waste disposal pile in Figures 8 and 9, in Dry Gulch, off Logan Wash. This disposal pile was approved by Garfield County after review by eleven state and federal agencies.

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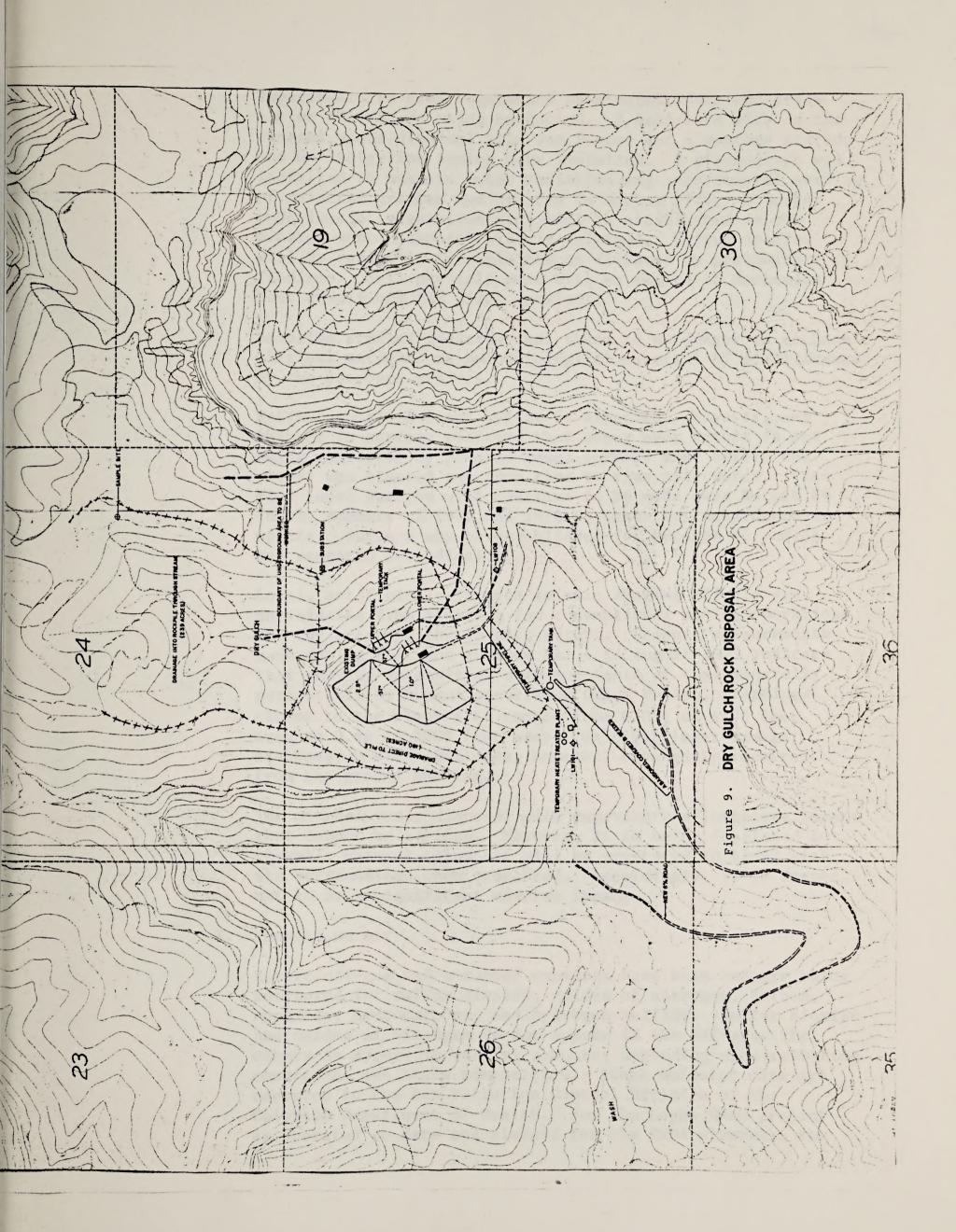
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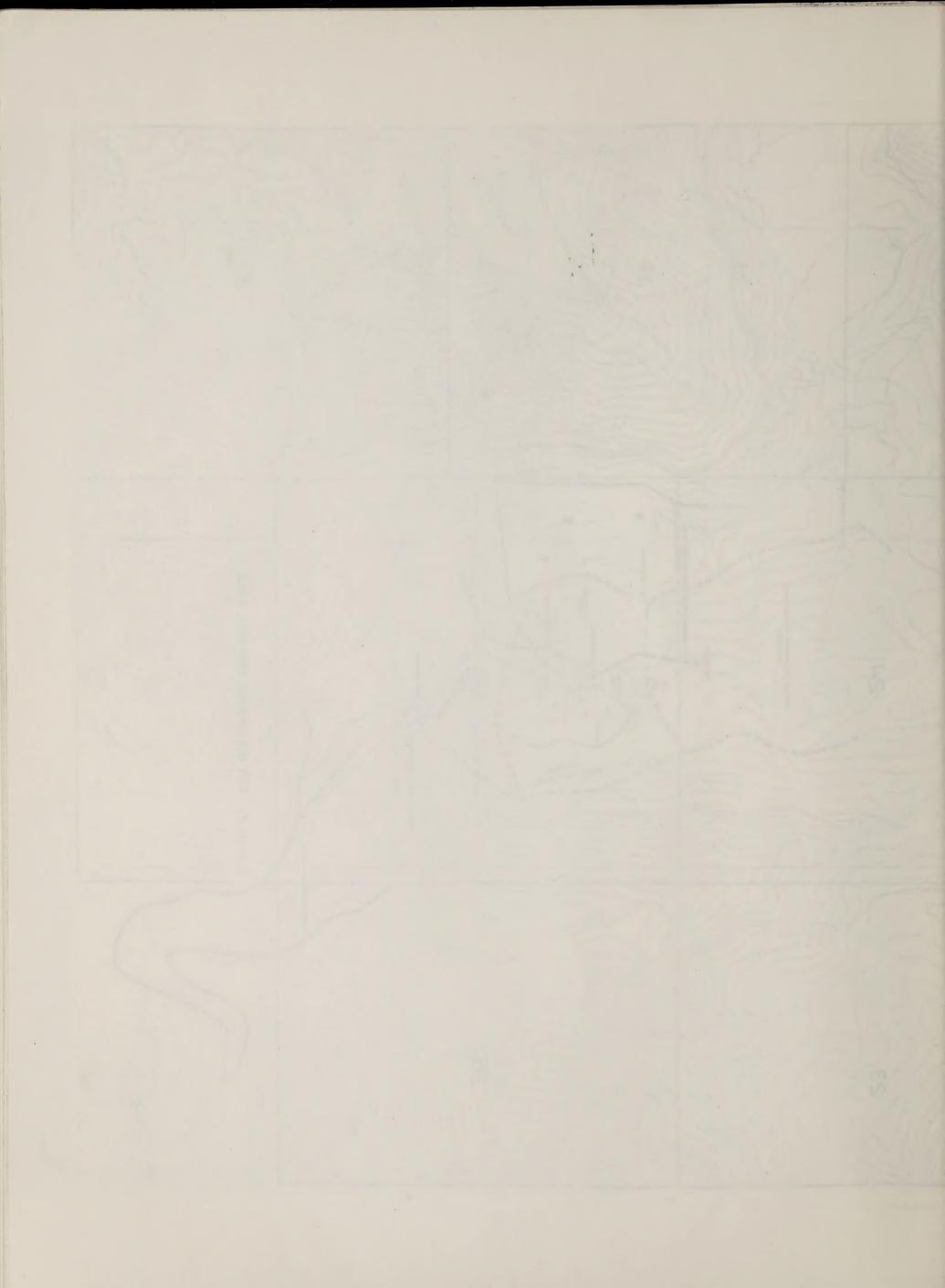
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Experiments to grow vegetation on mineral waste and areas cut or filled are being conducted. A half-acre site on the mineral waste disposal pile was fenced and a weather station and an irrigation system were installed. A pyranograph was installed to measure solar radiation and experimental seeding of selected grasses was started in Spring 1976. A larger experimental vegetation plot will be established as the mineral waste disposal pile is enlarged. Native species will be seeded or transplanted as dictated by preliminary findings. Soil particle size will be varied to determine best conditions for plant survival.

Baseline studies indicate that there is no danger to archaeological material or paleontological material of significance by the proposed project.

Neither subsidence nor uplift is expected. However, any changes in surface position that occur over Retort #4 are being monitored by precise level surveys made before the retort was blasted and from time to time afterwards. Precise level surveys will continue to be made over Retort #4 in the summers of 1977 and 1978 to check for subsidence or uplift. Surveys may be established for Retorts #5 and #6 and repeated periodically.

Local, artificially-induced seismic shaking effects are anticipated from blasting for conventional mining operations and for creating the <u>in situ</u> retort. Seismic measurements made during the shot in Room No. 4 in August 1975 indicate that shaking intensities only one-tenth of that generally perceptible by humans occurred at Grand Valley. Readings closer to the blast site ranged from 0.05g at 4100 feet away to 0.4g at 3000 feet away. No significant damage, distress, or slope failures, however, apparently resulted from the ground shaking.

The mineral waste disposal pile represents a long-term impact that cannot be avoided. However, it is being developed to resemble natural talus and will be vegetated to blend with its surroundings when completed. Accordingly, it is deemed not to be a significant adverse impact.

3. Impacts on Air

Retort off-gas and scrubbed exhausts have been and are being monitored for sulfur dioxide, oxides of nitrogen, carbon monoxide, hydrocarbons, and hydrogen sulfide. Sulfur dioxide and oxides of nitrogen do not appear in the off-gas. The others do appear in varying amounts, depending upon retorting conditions and shale composition. Stack emission data are reported to the Air Pollution Control Division of the Colorado Department of Health. For the Logan Wash project as operated to date and planned for the ERDA proposal, the

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total amounts of the pollutants that appear are sufficiently low that they can be dispersed by a suitable stack and thereby not violate air quality standards.

Ambient concentrations of SO_2 , NO_x , hydrocarbons, CO, particulates, and H2S have been measured at a point where the plume was expected to have maximum impact. Pollutants have been sampled for 24 hours every six days for one year beginning February 1, 1975, in accord with a program approved by the Air Pollution Control Division, Colorado Department The of Health. Data have been submitted quarterly to APCD. ambient air quality will be monitored while retorts are in operation and for one month afterwards to assure that air quality standards are not being exceeded. The existing station may be relocated in light of existing meteorological data.

DDD Experiments have been performed to determine nitrogen oxide emissions from burning crude shale oil in a boiler. Results that Jas after Jas after Itreatment indicate that current regulations can be met.

No infringements of air quality standards are projected for the Logan Wash project, either short-term or long-term. Pollutants released at the top of the property will not be trapped under inversion layers or be subject to cold air drainage.

will be used for the boiler Sulfide in the off-gas presents an air pollution problem in general, although it is not a serious difficulty for the proposed project at Logan Wash. When off-gas volumes are significantly larger than planned for Logan Wash, the gas will be burned to recover its heating value, and the sulfide must be removed before burning in order to prevent the formation of sulful dioxide. Various approaches to controlling the sulfide concentration in the off-gas have been tried, e.g., scrubbing in Venturi scrubbers and in spent retorts. Other approaches to controlling sulfide emissions are catalytic oxidation to sulfur dioxide (which would then be removed conventionally or by absorption in a spent retort) and reduction to elemental sulfur by the Stretford process. The latter process has been tried successfully on a laboratory scale. Both catalytic oxidation and the Stretford process will be evaluated for large scale application during the proposed contract (probably at the new site).

Oil mist has occasionally appeared in the off-gas. The oil in the gas has been characterized, and steps are being taken to prevent its occurrence in the future. Electrostatic precipitation has been successfully tested on a small scale. Electrostatic precipitation or a suitable alternative will be evaluated full-scale during the ERDA contract.

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No particulates have been found in the retort exhaust. However, attempts to measure them have sometimes been thwarted by the presence of water in the exhaust. The interference is annoying but has not caused a problem in controlling pollutant emissions.

It is planned to use radioactive krypton as a tracer to provide detailed information on pollutant transport for the specific Logan Wash situation. This work will be done in conjunction with tracer testing of the retorts.

4. Meteorology

Wind speed and direction and temperature and delta temperature data have been measured continuously on a 100 ft. tower near the single proposed stack location on the plateau from February 1, 1975. Rawinsonde temperature and wind data were taken twice daily every six days from February 1975 to February 1976 to obtain upper air data above the plateau; these data have been correlated with upper air data taken in Grand Junction. Relative humidity and precipitation data have also been taken, at the air quality monitoring site, from February 1, 1975. The data have been collected in accord with a program approved by the Air Pollution Control Division, Colorado Department of Health, and are being submitted quarterly to APCD. Wind speed and direction, temperature and delta temperature, relative humidity, and precipitation measurements will be continued for the duration of the project to increase the data base.

Data from the meteorology and ambient air quality studies are being used in conjunction with plant design data to model pollution concentrations from stacks and to establish stack design requirements.

The radioactive krypton tracer study described above will also serve to confirm the air pollution model or provide information to refine it.

There is almost a complete absence of upper air inversions above the Logan Wash site. See Section II.D.3.

5. Socioeconomic Impacts

The Logan Wash project is a continuation of an on-going operation and involves no new Occidental or contractor personnel. Accordingly, there will be no new demands for services or facilities nor new impacts on nearby communities. See Sections II.E., II.I., and II.L. for information on the existing situation. no parcioulaces have been frame in the record colourable havenor, attempts to measure have very sometimes been showned by the presence of worse in the estment. The infortherence is muching to see on caused a problem is sustemiliting pailorent entrones.

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It is envisioned that additional research and development will be continued at Logan Wash upon completion of work under the PON. If and when the site is ever phased out, it is expected that the personnel will be shifted to the maximum extent practical to other Occidental projects. If the site is considered for conversion to a commercial operation, an appropriate socioeconomic impact analysis will then be performed.

6. Occupational Safety and Health

The Logan Wash site is being operated in compliance with pertinent mining regulations. Carbon monoxide, methane, and hydrogen sulfide monitors placed throughout the mine are used to warn of escaping retort gas. The oxygen level is also monitored throughout the mine. Personnel working at the base of the stack carry hydrogen sulfide monitors on their belts.

Product oil, water, shale and natural materials have been examined for benzo(alpha)pyrene. Various products and byproducts of the project will be subjected as appropriate to a toxicological screening program to be defined as part of the environmental research plan.

A fully equipped ambulance and a second emergency vehicle are located at the mine. The latter can be readily converted to an ambulance with equipment kept ready for the purpose. Emergency medical technicians attached to the DeBeque Fire Department are located twelve miles from the site by road. Occidental and the DeBeque Fire Department have made prior arrangements for assistance in case of emergencies.

Solid waste disposal procedures are in accord with the Garfield County Sanitarian and the Colorado Department of Health. The mineral waste disposal pile is in accord with Garfield County regulations and related Colorado regulations.

C. Post Operational Impacts

When the Logan Wash site is eventually abandoned, the area will be reclaimed in accord with a plan to be approved by the Colorado Mined Land Reclamation Board. The mine will be secured from unintended entry, all unneeded wells and core holes will be properly completed, drill pads and unneeded roads and benches will be graded to blend with their surroundings and vegetated, and unwanted surface facilities will be removed. The mineral waste disposal pile will be appropriately contoured and vegetated to minimize percolation through the pile. Excessive dust will be controlled during these operations.

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IV. Mitigations

Α. Water

Sumps in the mine in which water and oil are collected are placed in strata that are believed to be impermeable to lateral flow. Where any uncertainty exists, the sumps are either lined with gunnite or with a clay-like silt that is carried with the water and settles out. Nevertheless, some check holes may be drilled in nearby rock in order to verify that the sumps are not leaking laterally.

As mentioned above, any excess of water that occurs above current requirements and available storage is evaporated by spraying on the face of the mineral waste disposal pile. Water treatment and discharge were deemed not to be a satisfactory alternative, for treatment facilities for the relatively small amount of water are unduly expensive. Also, the preferred approach of evaporating the water provides an opportunity to learn how to optimize the procedure. This learning can then be transferred to other settings that may require evaporation as the final disposition of "blowdown" from a treatment plant.

The hydrology study will provide information on aquifer communication. In strata above the ore, at least, communication between various parts of the Green River Formation is principally by fractures.

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Oil is handled and stored on the Logan Wash site in accord with an Oil Spill Prevention and Countermeasure Plan.

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A tall stack is used to disperse retort off-gas, which is sufficiently low in volume and pollutant concentrations that air quality standards are not violated. Flaring was considered not to be a good alternative, for it produces sulfur dioxide unless the hydrogen sulfide present is scrubbed first. Scrubbing required long lead-time equipment. Moreover, the equipment is unduly expensive for small-scale operations. than 502 and

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Dust is controlled in various ways. The road and parking areas are treated with a dust palliative. Mine dust and dust from disposing of mineral waste are controlled by water spraying. Barren areas are vegetated where possible.

System leaks are monitored by carbon monoxide, methane, and hydrogen sulfide alarms throughout the mine and by carbon monoxide alarms at various surface points, for example, at the adits and at base of the stack. The ambient air quality is monitored during retorting to assure that air quality standards are not violated.

D. Fire

Fire control procedures are in accord with the Colorado Bureau of Mines and Occidental's insurance company. Halon gas units are placed where electrical fires are a major possibility, e.g. the control rooms and the electrical room. Dry powder extinguishers are placed throughout the mine, in the maintenance shops, at storage tanks above ground, and on each piece of mobile diesel equipment. Foam units are installed in storage sumps and tanks. They are also available on wheels at the control rooms and at the heater-treater unit in Logan Wash. Office trailers are equipped with compliance fire extinguishers. High pressure pumps and hose are available to spray mine water if needed to extinguish a fire.

Thirty percent of the staff at the mine site have been trained in the use of the above equipment. Additional assistance is available on call from the DeBeque Fire Department, twelve miles away by road. The mine has a microwave telephone link to Grand Junction that can be used to telephone DeBeque.

E. Socioeconomic Considerations

There are no new socioeconomic impacts to be derived from the Logan Wash project, for the proposed work is an extension of an existing operation.

Emergency provisions exist at the Logan Wash site to accommodate personnel who are stranded there because of bad weather or for other reasons.

V. Alternatives

Alternatives to proceeding with the proposed project are doing the project at another site and not doing the project at all. The information to be gained from the project is vital to evaluating the technical and economic feasibility of modified <u>in situ</u> oil shale processing. This knowledge is essential if informed choices are to be made concerning energy sources. In view of the facts that the Logan Wash site is "ready to go" and is the only site in such a position and that no further construction-related and socioeconomic impacts will accompany the project, it is recommended that the project be undertaken at Logan Wash. Durce is searched has is westages approx. The rand and part dist second are reported with a first partic strue. Mine 1022 and durc true disposing of sineral spect are contrally to wether incurrent. Berres arous are secreted by

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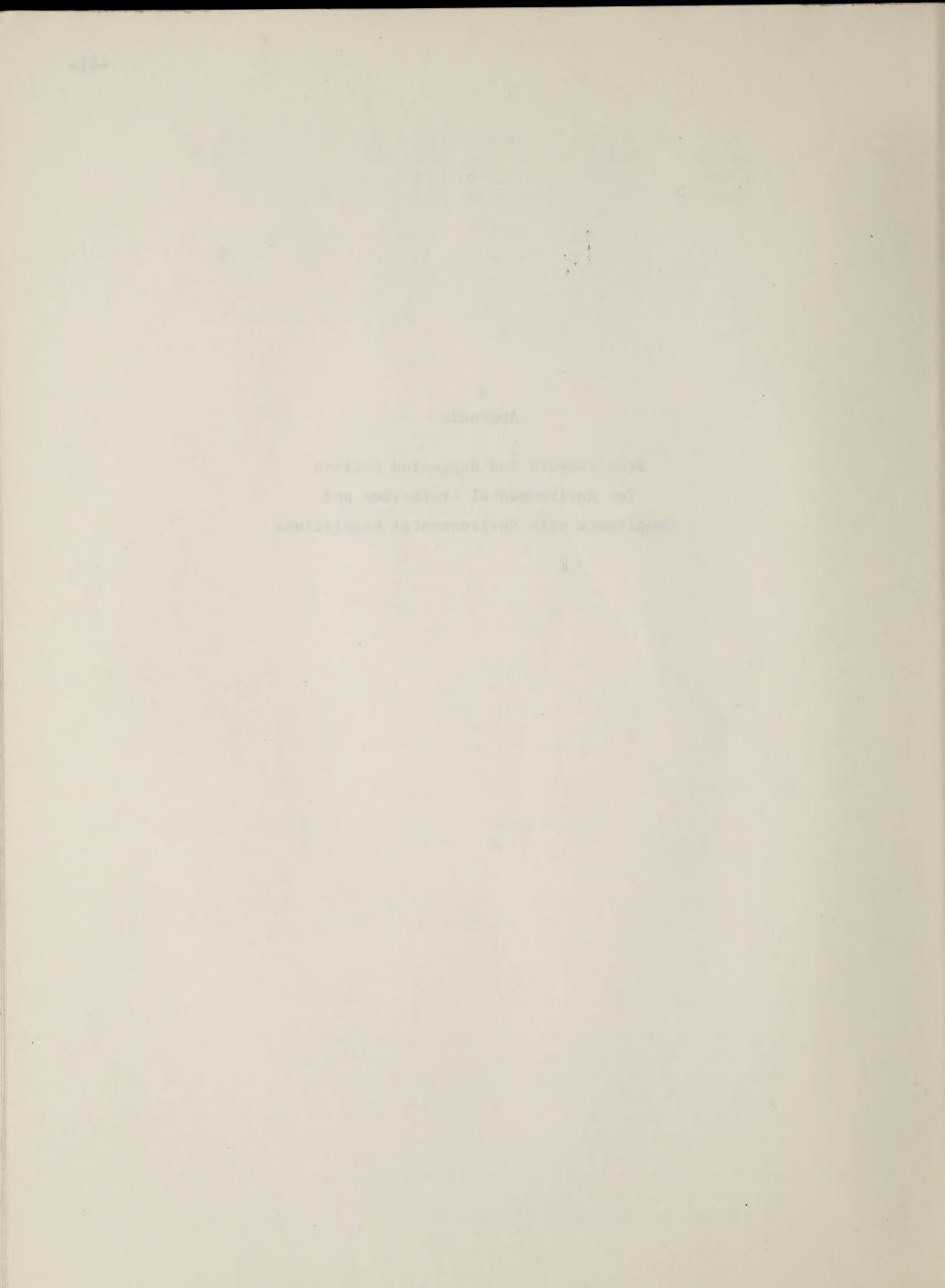
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Alternatives to proceeding view be proposed protons, and holes the project at another site at our dring the majeol at all. The information to be galand into an or let an view to all to -valuating the normalized to be pained into an or let an view to all a fire oil shall no be and economic fountballs of weighted in Ales of and be be and concerving restar no a set in view of the factor shall be be and concerving restar no a set in view of the factor and be be and concerving restar no a set in view of the factor shall be be and that alte in the factor of the proton of the factor when a position and that alte is "rest to p" and the the oil set of and a position and that alte the factor of the proton of the factor when a position and that alte the factor of the proton of the set of and a position and that alte the factor of the proton of the set of and a position and that alte the factor of the proton of the set of and a position and that alte the factor of the proton of the set of and a position and that alte the factor of the set of the set of and the approximent of the set of the factor of the set of all the set of all the set of all the set of the s

Appendix

Requirements and Suggested Actions for Environmental Protection and Compliance with Environmental Regulations

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	Suggested Actions	Pave or oil road to control dust and min- imize maintenance problems.	Spray or otherwise control dust during operations.	Design dust control provisions for adits.	Revegetate disturbed surfaces as necessary to control. fugitive dust.	Install photoelectric smoke detector in stack; install pre- cipitators or scrub- bers as required to meet the requirement.	-ditto-
Requirements and Suggested Actions for Environmental Protection and Compliance with Environmental Regulations	Regulation	Colo. Air Qual. Reg. No. 1	Colo. Air Qual. Reg. No. 1	Colo. Air Qual. Reg. No. l	Colo. Air Qual. Reg. No. 1	Colo. Air Qual. Reg. No. 1	Colo. Air Qual. Reg. No. 1
	Requirements	Obtain APCD ¹ * approval of fugitive dust control plan. ²	Obtain APCD approval of fugitive dust control plan.	Obtain APCD approval of fugitive dust control plans.	Dust not permitted to cross property line.	Not more than 20% re- duction in light trans- mission permitted.	Up to 40% reduction in light transmission per- mitted not more often than 2 minutes in any 60-minute interval for a period not greater than 180 days from be- ginning operations.
	Conditions	>165 vehicles per 24-hr. day (3-day average)	>5 acres of land involved	:	<30 mph wind	Solid or liquid fuels; continuous duty	Solid or liquid fuels; pilot, ex- perimental, or start-up condi- tions
	Activity or Situation	Unpaved roads or parking lots	Earth moving or grading	Detonating explosives	Visible dust	Smoke emissions	Smoke emissions
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* Numbered footnotes appear at the end of the table.

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T T	Activity or Strugtion	Conditions	Dominanto		Suggested
		NAP 1	Superint Sup	Vegutarton	VCLTOIIS
2	Particulate emissions	Ground level measurements x 4 9	Air to contain no more than 150 µgm/m ³ averaged over 24 hours and to average not more than 45 µgm/m ³ (annual arithmetic mean of 24 hour values).	Colo. Air Qual. Reg. No. 1	Model emissions to predict particulate levels; install precipitators or scrubbers as re- quired.
ω	Fuel burning	<10 ⁶ Btu/hr.	Particulate emissions must be less than 0.5 lb./l0 ⁶ Btu.	Colo. Air Qual. Reg. No. 1	Install monitor for particulates; use precipitators or scrub the effluent as required to meet the requirement.
6	Fuel burning	>10 ⁶ Btu/hr.; <500 x 10 ⁶ Btu/hr.	Particulate emissions must be less than amount shown on page 1.5, Colo. Air Qual. Reg. No. 1.	Colo. Air Qual. Reg. No. 1	-ditto-
10	Fuel burning	>500 x 10 ⁶ Btu/hr.	Particulate emissions must be less than 0.1 lbs./10 ⁶ Btu.	Colo. Air Qual. Reg. No. 1	-ditto-
11	Fuel burning	Structure to see	Oxides of nitrogen (as NO ₂) must be less than 0.2 lb./l0 ⁶ Btu input for gaseous fuels, less than 0.3 lb./l0 ⁶ Btu input for liquid fuels, and less than 0.7 lb./l0 ⁶ Btu input for than 0.7 lb./l0 ⁶ Btu input averages).	Colo. Air Qual. Reg. No. 6	Install NO ₂ monitor in stack; scrub ef- fluent as necessary to reduce NO ₂ emis- sions.
12	Fuel burning	Measurements made on the ground	Carbon monoxide must be less than 10 μ gm/m ³ (8-hr. average). [This value may be exceeded not more than once per year providing it does not exceed 40 μ gm/m ³ (1-hr. average) more than once per year.]	Federal Register, 36, April 30, 1971, 8187.	Model region to determine where CO build-ups may occur and site stack to minimize build-ups; monitor CO where build-ups may occur; burn or adsorb CO as req'd to reduce build- ups to satisfactory level.

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-3-	Suggested Actions	Clean any SO ₂ pres- ent out of stack gas by scrubbing or use low sulfur fuel which is analyzed daily.	-ditto-	Monitor feed or stack gas for sulfur com- pounds; scrub out SO ₂ as necessary.	Model emissions to predict degradation; control emissions accordingly.	Monitor hydrocarbon concentrations before and after final burn- ing; burn or adsorb as necessary.	Monitor hydrocarbon concentration before and after final burn- ing; burn or adsorb as necessary.
	Regulation	Colo. Air Qual. Reg. No. 6	Colo. Air Qual. Reg. No. 6	Colo. Afr Qual. Reg. No. 1	Colo. Air Qual. Reg. No. 1	Colo. Air Qual. Reg. No. 7 Lutur C	Colo. Air Qual. Reg. No7
	A Requirements	<0.8 lb. per 10 ⁶ Btu from liquid fuel (max. 2-hour average)	<pre><1.2 lb. per 10⁶ Btu from solid fuel (max. 2-hr. average)</pre>	After 1979: <150 ppm, OR <500 ppm and <5 tons/day Before 1980: <500 ppm	Air quality to be degraded no more than 75 $\mu gm/m^3$ averaged over 3 hours, or 15 $\mu gm/m^3$ averaged over 24 hours, or 3 $\mu gm/m^3$ averaged over 1 year (arithmetic average).	Reduce hydrocarbon emissions by 85% by burning or adsorption. Convert 90% of C to CO ₂ if burning is used.	Maximum allowable dis- charge is 40 lbs. per day and 8 lbs. per hour for photoreactive solvents. Maximum allowable discharge is 3000 lbs. per day and 450 lbs. per hour for photo- non-reactive solvents.
	Conditions of M	Liquid fuels burning burning	Solid fuel burning	Continuous duty; measurements made at source	Ground level measurements; Class I region	Hydrocarbons in con- tact with flame or heated in presence of oxygen before emis- sion; discharge >15 lb./day or 3 lb./hr.	Hydrocarbons not heated in presence of oxygen and not in contact with flame
	Activity or Situation	SO2 emissions	SO ₂ emissions	SO2 emissions	SO ₂ emissions	Hydrocarbon emis- sions	Hydrocarbon emis- sions
	Item	13	14	15	16	17	18

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-4- Suggested Actions	Design underground storage vessels with vapor recovery sys- tems. ⁴	Désign underground storage vessels with vapor recovery systems. ⁴	Design vessels as required. ⁴	Design equipment as required. ⁴	Submit plan to APCD for monitoring and controlling possible carcinogen emissions.	Use calibrated smoke glass to check; ad- just or modify equip- ment as required to meet requirements.	-ditto-
MOLSUNA BOUND WWW Sugg	Colo. Air Qual. Reg. No. 7 PS	Colo. Air Qual. Reg. No. 7	Colo. Air Qual. Reg. No. 7	Colo. Air Qual. Reg. No. 7	Colo. Air Qual. Reg. No. 8 Approved X	Colo. Air Qual. Reg. No. 1	Colo. Air Qual. Reg. No. 1
Requirements	Prevent vapor loss by pres- surizing with floating roof or cover or by using vapor recovery system.	Vapor recovery system required.	Vessel must have perman- ent submerged fill pipe or vapor recovery system.	Control vapor loss; may use floating roof or cover, solid cover with all openings sealed, or vapor recovery system.	Minimize carcinogen emissions; monitor for their presence.	<pre><30% reduction in light transmission required (except for non-consecu- tive periods of 15 seconds).</pre>	<pre><40% reduction in light transmission required except for non-consecu- tive periods of 15 seconds).</pre>
Conditions	>40,000 gallon tank; vapor pressure <11 psia	>40,000 gallon tank; vapor pres- sure >11 psia	>3500 gallon tank	Separation equip- ment >200 gallons	Containing known or experimental carcin- ogens (see Colo. Air Qual. Reg. No. 8 for list)	Off-road; <8000 feet elevation	Off-road; >8000 feet elevation
Activity or Situation	Hydrocarbon storage	Hydrocarbon storage	Hydrocarbon storage	Water/petro- leum product separators	Storage tanks and settling basins	Diesel powered equipment	Diesel powered equipment
Item	Andre 19 10095 (19 1000 10 100 100 100 100	or when the function	21 21	Nover 22. 3	59 959 74	24	25

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-5- Suggésted Actions	Prepare plans and secure APCD's ap- proval thereof.	Approved air qual- ity and meteorology baseline monitoring completed.	Prepare impact statement after plant design is proposed.
Regulation	Colo. Air Qual. Reg. No. 3	Colo. Air Qual. Reg. No. 3	Colo. Air Qual. Regs. Nos. 3 & 8
Requirements	Review plans with APCD before beginning any work.	Take baseline environ- mental data as determined in conference with APCD.	File impact statement with APCD as specified in preplanning review. Statement to include applicable climatic conditions and topo- graphic features af- fecting diffusion, ex- isting and expected growth of human and other habitation, and control steps to be taken regarding emis- sions, odor, photo-reac- tivity, toxicity, and damage to materials. Statement may have to describe impact on air quality in adjacent political subdivisions. Model of air behavior and integration with data from others may be required.
Conditions	Excluding analytical laboratory equipment, certain ventilating systems, fuel burn- ing equipment <500,000 Btu/hour input, internal combustion engines <1000 hp, and se- lected additional items	Excluding analytical laboratory equipment, certain ventilating systems, fuel burn- ing equipment 500,000 Btu/hour input, internal combustion engines <1000 hp, and se- lected additional items	-ditto-
Activity or Situation	Construction of any facility, process, or activity which may emit a con- taminant	Construction of any facility, process, or activity which may emit a con- taminant	-ditto-
Item	26 Devents	27	58

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5	Suggested Actions	Assess nature, ex- tent, and conse- quences of possible "upsets"; develop countermeasures.	Follow requirement; prepare for inspec- tion by APCD shortly after beginning operations.	Submit reports on hydrology, waste disposal, flora, fauna, seismology, noise, and air quality in support of construction/ disturbance applica- tions.
	Regulation	Colo. Air Qual. Reg. No. 3	Colo. Air Qual. Reg. No. 7	Garfield County Zoning Resolution, Section 4.03.07
	Requirement	Prepare curtailment procedures in the event of an "upset."	File contaminant emis- sion notice with APCD, one per stack or vent not sooner than 60 days and not later than 30 days before beginning operation.	Obtain Garfield County's permission to disturb existing topography by filling impact statement showing no significant ad- verse impact (1) on lawful use of water through deple- tion or pollution, (2) on use of adjacent land through generation of dust, vapors, smoke, noise, glare, vi- bration, or other emana- ting property by virtue of the proximity of the pro- posed operation, (4) on wildlife and domestic ani- mals via creation of haz- ardous attractions, altera- tion fuces, or disruption of use patterns, (5) on other parts of county via hazards or noisances caused by traffic.
	Conditions	-ditto-	-ditto-	In Garfield County
	Activity or Situation	Construction of any facility, pro- cess, or activity which may emit a contaminant	Operation of any facility, process, or activity which may emit a con- taminant	Any construction or any disturb- ance of existing topography (in- cluding road con- struction, pipe- line laying, and landfilling or dumping)
	Item	29	30 mg	ξ

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Suggested Actions	Meet the require- ment.	Most areas of planned disturb- ance already sur- veyed for arti- facts; no loss of artifacts antici- pated at site; sur- vey alternative pipeline routes be- fore choosing align- ment.	Develop employee transportation schemes that mini- mize pollution from secondary sources. Model the projected impact and prepare impact statement.	Prepare sewage dis-
Regulation	Garfield County Zoning Resolution, Section 4.03.07	Garfield County Zoning Resolution, Section 4.03.07	Colo. Air Qual. Reg. No. 3	Colo. Water Qual.
Requirements	Rehabilitate any site dis- turbance. This includes contouring, providing for drainage, controlling erosion, and establishing vegetation.	Avoid destroying or cover- ing archaeological and paleontological artifacts.	File impact statement with APCD showing number of employees, their methods of transportation, the generation of secondary business, and the results of using the APCD model of air pollution from sec- ondary sources.	Meet standards for indi-
Conditions	-ditto-	-ditto-	200 Adrikant	
Activity or Situation	Any construction or any disturb- ance of existing topography (in- cluding road con- struction, pipe- line laying, and landfilling or dumping)	-ditto-	Employment of 500 or more people at any one time at any given location	Discharge of
Item	32	33	34	35

effluent or sewage into soil Discharge of

state waters (including ground waters) Discharge of effluent into

36

Meet standards for individual sewage disposal systems.

Monitor discharges as required by WQCD.⁵

Colo. Water Qual. Regs., Chap. 66, Article 44

Consult WQCD for mon-itoring requirements. Prepare sewage dis-posal plan. Colo. Water Qual. Regs., Chap. 66, Article 28

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Conditions	Requirements	Regulation	Suggested Actions
1	 Five-day biological oxy- gen demand <45 mg/l aver- aged over 7 days and <30 mg/l averaged over 30 days. 	Colo. Water Qual. Regs., Chap. 66, Article 28 and Chap. 25, Article 8	Determine bes to use or tre- dispose of wave mine and proce water
	 Suspended solids <45 mg/l averaged over 7 days and <30 mg/l averaged over 30 days. 		-
	 Residual chlorine <0.5 mg/l. 		
	4. 6.0 < pH < 9.0		
	<pre>5. Oil and grease <10 mg/l; no visible sheen.</pre>		
	<pre>6. Fecal coliform bacteria <1000/100 ml (geometric mean of five samples in </pre>		
	J. Turbidity increase <10		

Discharge of waste water

38

Mine drainage

39

to extent practical. Mini-Prevent ground or surface drainage to state waters. water from entering mine discharge of pollutional mize the formation and

Federal Register, 38, May 22, 1973, 13528.

8. Dissolved oxygen >5 mg/l.

Jackson units.

odor, settleable solids, 9. Free from taste, color,

floating solids, and

toxic materials.

Secure a permit to discharge wastewater from

must not be degraded.⁶ WQCD; receiving water

Colo. Water Qual. Regs., Chap. 66, Article 28

its quality; develop scheme; secure perappropriate waste-Monitor receiving body to determine mit to discharge. water treatment

Minimize water enterveloped for item #37. accord with plan dewater entering mine ing mine; collect and handle it in

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eat and st way aste ess

Item

Activity or Situation

37

Discharge of

(including ground effluent into state waters waters)

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Suggested Actions	Select site and depth carefully and make preinjection tests; provide ap- propriate monitoring and contingency plans.	Meet the require- ment.	Meet the require- ment.	Meet the require- ment.	Construct and pro- tect wells suffic- iently to prevent pollution of ground and surface waters; fill, plug, or seal unused or abandoned wells sufficiently to prevent pollution of ground and surface waters.
Regulation	Federal Register, <u>39</u> , April 9, 1974, <u>12</u> 922-23.	Colo. Water Qual. Regs., Chap. 66, Article 28	Colo. Water Qual. Regs., Chap. 66, Article 28	Colo. Water Qual. Regs., Chap. 66 Artícle 28	Colo. Water Qual. Regs., Chap. 66, Article 28
Requirements	Preinjection tests must con- clusively demonstrate that emplacement will not inter- fere with present or poten- tial uses of water resources nor result in other environ- mental hazards.	Owner or operator to notify Colo. Div. of Water Re- sources on form designated by the Division of intent to drill or rework a well.	Owner or operator to main- tain a \$25,000 bond for all wells or file a \$10,000 bond for operations subject to a specific notification.	Owner or operator to file with Water Res. Div. a drill report consisting of a map, lithologic log, drilling date, well diameter and depth within 60 days of completion of drilling program.	Prevent pollution of ground and surface waters by con- tamination from wells.
Conditions	Storage or disposal (discharge) of fluid by injection or sub- surface emplacement.	Wells which are greater than 3000 ft. in depth; wells which are not owned by owner of surface estate (regardless of depth); wells which are not for appropriation of water for benefi- cial use (regardless of depth).	-ditto-	-ditto-	•
Activity or Situation	Subsurface emplace- ment of fluids	Drilling of wells, cores, etc.	-ditto-	-ditto-	-ditto-
Item	40	41	42	43	44

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Suggested Actions	Check for odors at the site. If odors are not detected at the site, there should be no prob- lem at the property lime. If odors are detected at the site, check for odors at the property lime (without dilution). If odors are detected at the property line without dilution). If odors are detected at the property line without dilution, dilution. If odors are detected with dilution, determine sources and reduce emanations.	Determine release of carcinogens from freshly mined and weathered raw shale; compare with natur- ally occurring pro- cesses.	Meet the require- ments.
Regulation	Colo. Air Qual. Reg. No. 2	1	Dept. of Trans- portation Title 49, Chap. 1, Part 195; Federal Water Pollution Control Act Amendments of 1972; and Code of Federal Regula- tions, Title 40, Chap. 1, Subchap. D., Part 112.
Requirements	A violation exists if odors are detected after being diluted with 15 or more volumes of odor-free air.		Design facilities to minimize chance of oil spills and to minimize adverse consequences; prepare a "Spill Pre- vention and Counter- measure Plan"; have the plan certified by a Professional Engineer that it is in accord with good engineering practice; report spills as required in the reg- ulations.
Conditions	Measured at the property line	Containing known or experimental carcin- ogens (see Colo. Air Qual. Reg. No. 8 for list)	
Activity or Situation	Odor emissions	Raw shale	Potential oil spills (from tanks, basins, pipes, transfer equipment, etc.)
Item	45	46	47

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Suggested Actions	Prepare compre- hensive environ- mental impact analysis (see also items 28, 31, and 34).	•					
Regulation	Nat'l Environ- mental Protec- tion Act of 1969						her equipment.
Requirements	Obtain Special Land Use Permit; file environ- mental impact report as required.		partment of Health.	plans must contain	y, sures, ³ ntive measures, and methods proposed to	n No. 1.	It may be possible to use one vapor recovery system for a battery of vessels and other equipment.
Conditions	E.g. a pipeline across federal lands		L Division, Colorado De	f fugitive dust control	description of nature and scope of activity, proposed dust abatement and preventive measures, ³ time schedule for dust abatement and preventive measures, and description of any monitoring and sampling methods proposed to record and report data to APCD.	o Air Quality Regulatio	le vapor recovery syste
Activity or Situation	Use of federal lands	ŝ	¹ APCD: Air Pollution Control Division, Colorado Department of Health.	Applications for approval of fugitive dust control plans must contain	 (1) description of nature and scope (2) proposed dust abatement and pre (3) time schedule for dust abatemen (4) description of any monitoring a record and report data to APCD. 	See Section II.D.9, Colorado Air Quality Regulation No.	ly be possible to use o
Item	48	Footnotes	1 APCD:	² Appli		³ See S	4 It ma

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Water Quality Control Division, Colorado Department of Health. 5 WQCD: ⁶ There is a proposal to prevent all industrial discharges of wastewater in the Colorado River basin that could reach either ground or surface waters, regardless of water quality. See "Proposed Water Quality Standards for Salinity, Including Numeric Criteria and Plan of Implementation for Salinity Control, Colorado River System," Colorado River Basin Salinity Control Forum, June 1975. p. 85.

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Requirements and Suggested Actions

	Suggested Actions	File sooner if pos- sible to allow time for APCD to review materials and ob- tain any additional information needed. The 95 day clock be- gins only when APCD has in hand all neo- essary information.	-ditto-
Regulations	Regulation	Colo. Air Qual. Reg. 3	Colo. Air Qual. Reg. 3
for Environmental Protection and Compliance with Environmental Regulations	Requirements	File permit application and air contominant emission notice with APCD, one per stack or vent, not later than 95 days before desired use.	-ditto-
Environmental Protection an	Conditions	Excluding analytical laboratory equipment, certain ventilating systems, heater treaters burming sweet gas, fuel burn- ing equipment <500,000 Btu per hour input, and selected addition- al items.	 Excluding analyti- cal laboratory equipment, certain ventilating sys- tems, heater treat- ers burning sweet gas, fuel burning equipment <500,000 Btu per hour input, and selected addi- tional items. Applies to any mod- ification or relo- cation of stacks, vents or other equipment.
H	Activity or Situation	Construction or operation of a new direct air contam- ination source	Alteration of an existing direct air contamination source
	Item	30	49

 Applies to changes in activity or method of operation that may increase air contaminant emissions.

Suggested Actions	1	Install meters to record tank inflows and outflows, meas- ure inventories directly, and compare results daily.	Consult WQCD for approved detectors or indicators.	Obtain test instructions from State Inspector of Oils.	Use standard report form obtained from State Inspector of Oils.
Regulation	Colo. Air Qual. Reg. No. 3	Proposed Colo. Water Quality Control Reg. No. 7-5.2	Proposed Colo. Water Quality Control Reg. No. 7-5.3	Proposed Colo. Water Quality Control Reg. No. 7-5.4	Proposed Colo. Water Quality Control Reg. No. 7-5.5, 5.6
Requirements	File air contaminant emis- sion notice with APCD, one per stack or vent, not later than 95 days before desired use.	Maintain and analyze records of inventory, re- ceipts, and discharges to detect leaks early.	Install approved leak detectors or indicators.	Post approved test in- structions.	Test pipes and tanks and record results for state review; save records for one year; repair any leaks detected.
Conditions	 Excluding analyti- cal laboratory equipment, certain ventilating sys- tems, heater treat- ers burning sweet gas, fuel burning equipment <500,000 Btu per hour input, and selected addi- tional items. Applies to changes in methods of op- eration (but not equipment) that do not increase air contaminant emissions. 	1	Submerged pump sys- tem installations or modifications	1	Leaks suspected
Activity or Situation	Modified operation of an existing direct air con- tamination source	Underground stor- age of liquid petroleum products	-ditto-	-ditto-	-ditto-
Item	20	51	52	53	54

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Suggested Actions	1	
Regulation	Proposed Colo. Water Quality Control Reg. No. 7-5.7	Proposed Colo. Water Quality Control Reg. No. 7-5.10
Requirements	Report leaks within 36 hours of suspicion or confirmation to State Inspector of Oils.	Conform to Uniform Fire Code's "Recommended Stan- dard for Corrosion Pro- tection of Pipe, Fittings, and Tanks Containing Flam- mable Liquids."
Conditions	Leaks greater than 250 gallons either suspected or con- firmed	System installation or modification
Activity or Situation	-ditto-	-ditto-
Item	55	56

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DATE LOANED USDI - BLM	Form 1279-3 (June 1984)
BORROWER	BORROWER'S CA TD 195 .04 R87 Ruskin, Arnolc Environmental report for th

