UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
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DEC 03 2010

Ref: 8EPR-EP

Mr. David Stewart
Environmental Health & Safety Manager, Western Region
EnCana Oil & Gas (USA) Inc.
Republic Plaza
370 17th Street, Suite 1700
Denver, CO 80202

Dear Mr. Stewart:

I am writing to provide EPA's input on EnCana's Remedial Alternatives Evaluation - TRIBAL PAVILLION 14-11, Remedial Alternatives Evaluation - TRIBAL PAVILLION 24-3, and Remedial Alternatives Evaluation - TRIBAL PAVILLION 42-11 dated August 31, 2010. As you know, EPA's investigation of groundwater in the Pavillion area confirmed the presence of shallow groundwater contamination associated with the inoperative pits. As we have discussed with you, we have an interest, as do other governmental entities, in ensuring that the pits are addressed in a technically sound manner. As part of that effort I am enclosing EPA's detailed comments on EnCana's submitted documents listed above. Our comments reflect the following general concerns:

- Monitored Natural Attenuation (MNA) is presented as a presumptive remedy, and no additional alternatives are presented and evaluated. Remedy selection should be based on a comparative evaluation of multiple remedies with regard to criteria such as costs, risk, practicability, and time to achieve clean-up goals.
- There is insufficient evaluation to support selection of MNA as an appropriate remedy. More comprehensive and detailed information, such as clear identification of source mass, groundwater flow direction, and contaminant phase distribution and partitioning would be needed to demonstrate the feasibility and appropriateness of MNA or an alternate remedy selection.
- Chemistry data from monitoring wells and soil boring suggests that there may be an active source of contamination contributing to the groundwater plume at one or more of the pit sites. Indicators of natural attenuation that would be expected from petroleum degradation are not reported, and concentrations of BTEX and Diesel Range Organics are higher than would be expected if the sole source were historic soil contamination.

selection of an appropriate remedy:

- The monitoring well network and sampling should be reviewed and revised as necessary to accurately describe the plume and monitor water levels and contaminant movement and to provide sufficient information to fully support selection and appropriate implementation of MNA.
- Additional testing should include soil leachate testing for benzene.
- Additional testing should be conducted to evaluate the presence of additional sources.

I am sure that there will be an opportunity to discuss our comments in more detail when Tribal, State, EPA and EnCana representatives meet regarding the pits on December 7. We appreciate the opportunity to provide our input on the Remedial Alternatives Evaluations. If you or your staff have questions regarding our general concerns or detailed comments, the most knowledgeable person on my staff is Gregory Oberley, who can be reached at 303-312-7043.

Sincerely,

Martin Hestmark
Deputy Assistant Regional Administrator
for Ecosystems Protection & Remediation

Enclosure

Cc: Don Aragon, Wind River Environmental Quality Commission
Tom Kropatsch, Wyoming Oil & Gas Conservation Commission
Kathy Brown, Wyoming Department of Environmental Quality Lander Office
Deborah Harris, Wyoming Department of Environmental Quality Lander Office

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