

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109



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JAN 13 2010
COGCC
OGCC Employee:
 Spill Complaint
 Inspection NOAV
Tracking No:

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

Spill or Release Plug & Abandon Central Facility Closure Site/Facility Closure Other (describe): Pit Restoration

| | |
|---|---|
| OGCC Operator Number: <u>10322</u> | Contact Name and Telephone: <u>Scott Stapp (Merchant Energy Partners, LLC)</u> |
| Name of Operator: <u>East Cheyenne Gas Storage, LLC</u> | No: <u>(720) 351-4000</u> |
| Address: <u>1775 Sherman Street, Suite 1200</u> | Fax: <u>(720) 351-4207</u> |
| City: <u>Denver</u> State: <u>CO</u> Zip: <u>80203</u> | |
| API Number: <u>05-075-07181</u> County: <u>Logan</u> | |
| Facility Name: <u>Schwake A1</u> Facility Number: <u>Schwake A1</u> | |
| Well Name: <u>Schwake</u> Well Number: <u>A1, 1, or A2</u> | |
| Location: (QtrQtr, Sec, Twp, Rng, Meridian): <u>SWNE 6 11N 52W</u> Latitude: <u>40.959322</u> Longitude: <u>-103.215404</u> | |

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Crude oil, produced water

Site Conditions: Is location within a sensitive area (according to Rule 901e)? Y N If yes, attach evaluation.

Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): Dry land farming, residential

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: _____

Potential receptors (water wells within 1/4 mi, surface waters, etc.): Water well 250 ft NE on Melvin Nelson property, which was replaced on October 19, 2009 to remove as a receptor.

Description of Impact (if previously provided, refer to that form or document):

| Impacted Media (check): | Extent of Impact: | How Determined: |
|---|---|--|
| <input checked="" type="checkbox"/> Soils | <u>Hydrocarbon stains and constituent impacts in pits</u> | <u>Visual inspection, pit excavation and sample analysis</u> |
| <input type="checkbox"/> Vegetation | _____ | _____ |
| <input checked="" type="checkbox"/> Groundwater | <u>Old Nelson water well (depth 250 ft)</u> | <u>Water well sample analysis (Terracon 12/3/08 Report)</u> |
| <input type="checkbox"/> Surface Water | _____ | _____ |

REMEDIATION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):

Replaced existing residential water well serving Mr. Melvin Nelson (depth 250 ft, permit no. 280327) with a new well completed in the Pierre Shale, below the High Plains Aquifer, screened from 820-1020 ft (well report included as Attachment 3; see Figure 1 for locations).

Describe how source is to be removed:

Pump out skim pit oil and water; haul off-site for disposal. Other source materials in the main pit and overflow pit will be closed in place.

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:

In general, a combination of off-site disposal and in-place closure will be used to remedy impacts to soil and ground water. Attachment 1 provides a description of these proposed activities.

Submit Page 2 with Page 1



Tracking Number: _____
 Name of Operator: East Cheyenne Gas Storage
 OGCC Operator No: 10322
 Received Date: 1/13/10
 Well Name & No: Schwake A1
 Facility Name & No: _____

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REMEDIATION WORKPLAN (Cont.)

OGCC Employee: Axelson

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):
 Ground water monitoring is not proposed because the potential for exposure to ground water has been addressed by replacement of a residential water well. The water in the new well will be tested for compliance with the criteria in Table 910-1 upon proper well development. The source areas at the site will be closed to reduce the potential for migration of constituents of concern in soil to ground water. Once closed, the residual concentrations will likely attenuate with time to levels that are consistent with Table 910-1. During this period, exposure to elevated concentrations is unlikely to occur because the new water well provides a ready supply of potable water to the only water user within 1/2 mile of the site.

Describe reclamation plan.
 See Attachment 1 for remediation workplan, including reclamation.

See Attachment 2 for description of site investigation results.
 See Table 1 for analytical results.
 See Figure 2 for site map and sample location.

Produced oil and water from the skim pit will be removed and disposed off-site at Conquest Disposal
22625 Co. Rd 64
Greeley, CO 80631
 Crude-saturated soil will be removed and disposed off-site at Conquest Disposal.
 The affected soil in the main pit and overflow pit will be mixed with clean soil and closed in place under a constructed cap.

See Attachment 1 for remediation workplan.

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: 10/8/09 Date Site Investigation Completed: 10/8/09 Date Remediation Plan Submitted: 12/22/09
 Remediation Start Date: 1/18/10 Anticipated Completion Date: 4/30/10 Actual Completion Date: _____

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.
 Print Name: _____ Signed: _____
 Title: _____ Date: _____

OGCC Approved: [Signature] Title: EPS Date: 2/1/10
See letter of conditional approval dated 2/1/10. ga