



EXPLORATION AND PRODUCTION  
1058 CR #215  
P.O. Box 370  
Parachute, Colorado 81635  
970/285-9377 – 970/285-9573 (fax)

September 25, 2009

Mr. Chris Canfield  
Environmental Protection Specialist, Northwest Region  
Colorado Oil and Gas Conservation Commission  
707 Wapiti Ct., Suite 204  
Rifle, CO 81650

**Re: Form 27, Pit Closure  
GM 11-1**

Dear Mr. Canfield:

Williams Production RMT Company (Williams) is submitting the Form 27 for a Pit Closure Process on the Williams GM11-1 well pad. HRL Compliance Solutions, Inc. has compiled the information contained in the Form 27 and is working in direct consultation with Williams.

Should you have you have any questions or concerns in regards to the Form 27, please do not hesitate to contact me (970) 263-2704.

Best Regards,

*Karolina Blaney*

Karolina Blaney  
Environmental Specialist  
Piceance - Valley Asset Team  
(970) 683-2295 (Office)  
(970) 589-0743 (Cell)  
Karolina.Blaney@williams.com

Attachments (3):

- Form 27
- Attachment A – Remediation Workplan
- Attachment B – Pit Location Map

cc: Debbie Baldwin  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln St. Suite # 801  
Denver, CO 80203

cc (via e-mail): R. Bleil      M. Paules      M. Mumby

File: Waste Management/Plans & Documents

State of Colorado  
**Oil and Gas Conservation Commission**



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

FOR OGCC USE ONLY

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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 Closure

OGCC Operator Number: <u>96850</u>	Contact Name and Telephone: <u>Karolina Blaney</u>
Name of Operator: <u>Williams Production RMT Company</u>	No: <u>970/285-9377</u>
Address: <u>1058 CR 215</u>	Fax: <u>970/285-9573</u>
City: <u>Parachute</u> State: <u>CO</u> Zip: <u>81635</u>	
API Number: <u>05-045-07271</u> County: <u>Garfield</u>	
Facility Name: <u>UNOCAL</u> Facility Number: <u>GM 11-1</u>	
Well Name: <u>UNOCAL</u> Well Number: <u>GM 11-1</u>	
Location: (QtrQtr, Sec, Twp, Rng, Meridian): <u>NWNW 1 7S 96W 6PM</u> Latitude: <u>39.472099</u> Longitude: <u>-108.064895</u>	

**TECHNICAL CONDITIONS**

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): If there are any impacts it will be from 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.): Range Land

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Idefonso-Lazear complex, Potts-Idefonso complex

Potential receptors (water wells within 1/4 mi, surface waters, etc.): There are none

**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>Will be determined when the liner is removed</u>	<u>Visual inspection and composite sampling</u>
<input type="checkbox"/> Vegetation	_____	_____
<input type="checkbox"/> Groundwater	_____	_____
<input type="checkbox"/> Surface Water	_____	_____

**REMEDIATION WORKPLAN**

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

Any remaining liquids and pit bottoms will be removed and the liner will be visually examined for tears.

**Describe how source is to be removed:**

- All free liquids in the pit will be pumped off and transported to the nearest evap facility for treatment.
- Pit bottoms will be pumped from the bottom of the pit utilizing a sludge pump.
- The pit bottoms will be placed into lined roll off containers located on the well pad.

**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.:**

See Attachment A



Tracking Number: \_\_\_\_\_  
Name of Operator: \_\_\_\_\_  
OGCC Operator No: \_\_\_\_\_  
Received Date: \_\_\_\_\_  
Well Name & No: \_\_\_\_\_  
Facility Name & No: \_\_\_\_\_

REMEDIATION WORKPLAN (Cont.)

OGCC Employee: \_\_\_\_\_

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

Groundwater has not been affected.

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing. Use additional sheet for description if required.

When remediation is complete, the pit will be reclaimed in accordance with the 1000 series rules.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required?  Y  N If yes, describe:

This will be dependant on the soil analytical results from the bottom of the pit.

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

This will be dependant on analytical results as discussed in Attachment A

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: 9/21/09 Date Site Investigation Completed: 9/25/09 Date Remediation Plan Submitted: 9/25/09  
Remediation Start Date: 10/19/09 Anticipated Completion Date: 10/31/09 Actual Completion Date: TBD

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Karolina Blaney

Signed: Karolina Blaney

Title: Environmental Specialist

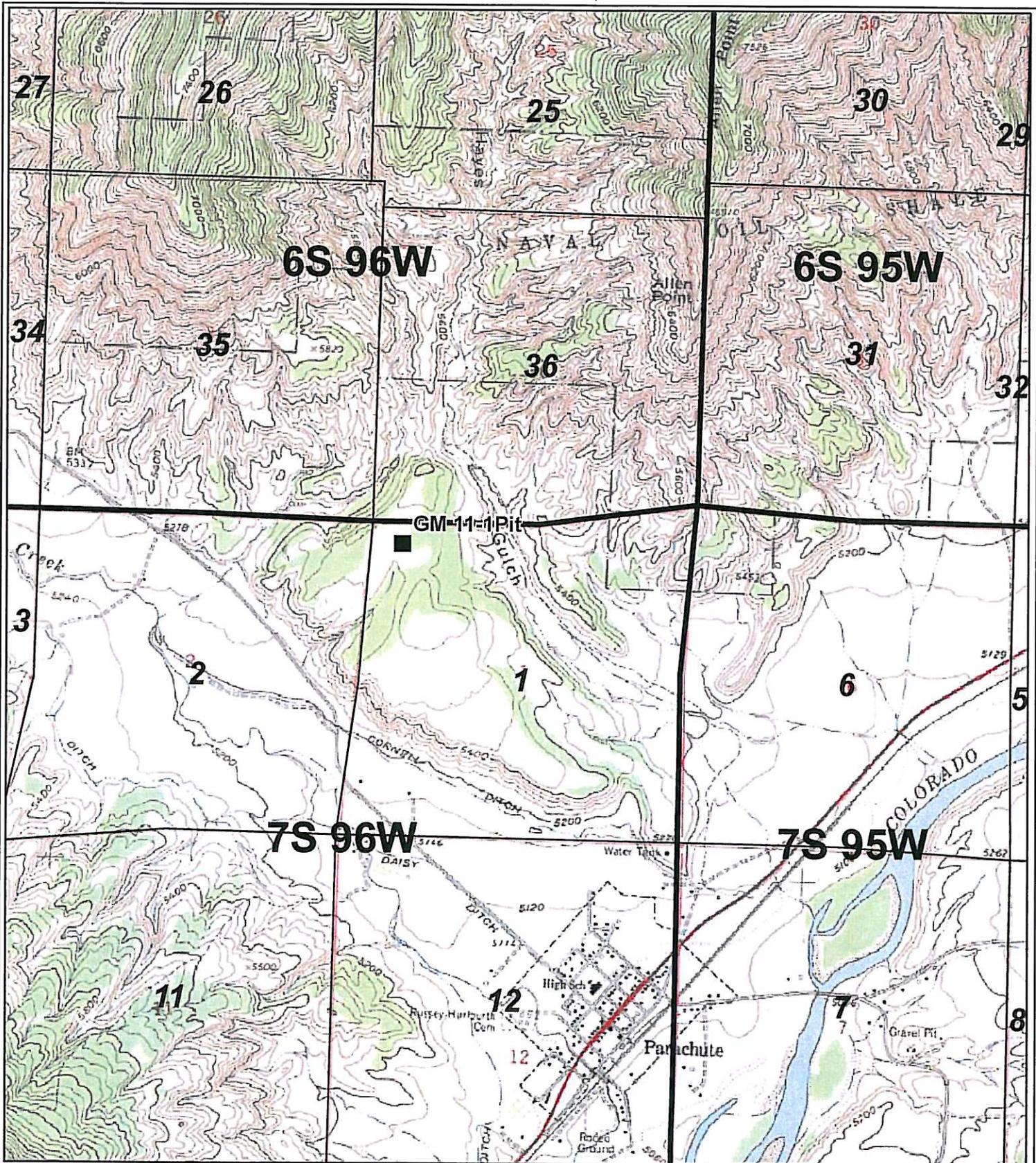
Date: 9/25/09

OGCC Approved: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

## Remediation Workplan

**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, in-situ bioremediation, burning of oily vegetation etc.**

- Contents in the lined roll off containers will be sampled for constituents listed in Table 910-1.
- Pending analytical results; the pit bottoms will either be placed back into the pit during reclamation, if the analytical results show contaminate levels below Table 910-1 guidelines or:
  1. Amended to reduce contaminate levels below Table 910-1 guidelines and then placed back into the pit or;
  2. The pit bottoms will be disposed of at an approved facility
- The pit liner will then be removed and the soils below it will be samples for Table 910-1.
- If contaminate levels exceed Table 910-1 guidelines the soil will be remediated to a depth to where Table 910-1 criteria is not exceeded.
- Any impacted soils removed from the bottom of the pit will either be treated on site to levels below Table 910-1 or disposed of at an approved disposal facility.
- A background sample consisting of undisturbed topsoil will be taken from the location. The sample point(s) will have GPS point(s) taken on site, and will be sent to an approved analytical laboratory for analysis's including, but not limited to: arsenic, electric conductivity, sodium adsorption ratio and pH. Verifying the naturally occurring chemical components of the native soils will allow for an accurate comparison to the media possibly impacted by the pit.



**Legend**

■ Pit Location

