

State of Colorado
Oil and Gas Conservation Commission

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



#6774

FOR OGCC USE ONLY
RECEIVED
DEC 29 2011
COGCC/Rifle Office
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): _____

OGCC Operator Number: <u>62340</u>	Contact Name and Telephone: <u>Andrew Busch</u>
Name of Operator: <u>National Fuel Corporation</u>	No: <u>970-858-7490</u>
Address: <u>8400 E Prentice Ave, Suite 1100</u>	Fax: <u>970-858-7490</u>
City: <u>Greenwood Village</u> State: <u>Co</u> Zip: <u>80111</u>	

API Number: <u>05-045-06392</u>	County: <u>Garfield</u>
Facility Name: <u>Bridle Field #2-10 Pit</u>	Facility Number: <u>113542</u> ← <u>Location ID 322497</u>
Well Name: <u>Federal No. 2-10-84</u>	Well Number: <u>119564</u> (119464)
Location: (QtrQtr, Sec, Twp, Rng, Meridian): <u>NWNE, Sec 10 - T8S - R104W, 6th PM</u>	Latitude: <u>39.38806553</u> Longitude: <u>108.9729042</u>

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Produced water/blow down fluids.

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, multi-use BLM.

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Billings Silty Clay Loam, Mancos Shale

Potential receptors (water wells within 1/4 mi, surface waters, etc.): No water wells within 1/4 mile. Intermittent unnamed drainage 500 feet downgradient (SSE) of the site.

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	Yet to be determined <u>Visual = surface impact</u>	Will be determined as part of this investigation.
<input type="checkbox"/> Vegetation	Yet to be determined	Will be determined as part of this investigation.
<input type="checkbox"/> Groundwater	Yet to be determined	Will be determined as part of this investigation.
<input type="checkbox"/> Surface Water	Yet to be determined	Will be determined as part of this investigation.

REMEDIATION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):
A sample of the fluid in the pit was collected on 11/1/11. The analytical results for this sample are attached.

Describe how source is to be removed:
Remaining pit fluids will be removed and disposed of at the Danish Flats facility in Utah, in accordance with COGCC series 900 regulations. Impacted soils will be excavated and temporarily stockpiled on location and characterized for disposal.

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.:
Pit will be evacuated and fluids will be disposed as described above. A tank will be set to capture produced fluids from separating equipment. Stained soils in pit will be excavated. Impacted soils (based on visual evidence) on and around the boundaries of the pit will be excavated. Samples will be gathered from the excavated area and analyzed for contamination per COGCC rule 910.1. Excavated soils will be covered, bermed and placed on pit liner material, on the well pad, until results of soil tests are complete. Once soil testing is completed, a plan for remediation will be submitted.

FORM
27
Rev 6/99

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Tracking Number:	_____
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REMEDIATION WORKPLAN (Cont.)

OGCC Employee: _____

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

It is not anticipated that groundwater will be impacted at this location. If it is determined through field investigation that groundwater has been impacted, a proposed monitoring/remediation plan will be submitted as an update to this Form 27.

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.

Pending analytical results and COGCC approval the pit will be backfilled in accordance with the reclamation guidelines specified in the APD.

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:

Further investigation is pending. Results will be included as an update to this Form 27.

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

The remediation or disposal of any potentially impacted soils will be determined based on laboratory analytical results and will be reported as an update to this Form 27.

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: <u>11/01/2011</u>	Date Site Investigation Completed: <u>TBD</u>	Date Remediation Plan Submitted: <u>12/22/2011</u>
Remediation Start Date: <u>April 2012</u>	Anticipated Completion Date: <u>May 2012</u>	Actual Completion Date: <u>TBD</u>

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

Print Name: Andrew Busch Signed: Andrew Busch
Title: VP of Operations Date: 12/22/11

OGCC Approved: Linda Spyr Rourke Title: NW Env. Prot. Specialist Date: 12/29/2011

COA- point of clarification: pit is unlined currently. Sampling and Analysis Plan attachment, mid-page - refers to "sub-linear soil"