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March 7, 2014

RECOMMENDED LANGUAGE FOR COGCC FORM 2A:

Best Management Practices for Effective Bioremediation of Drill Cuttings:

1. Mixing and Treatment:
 - 1.1. All cuttings shall be mixed on location utilizing the specialized CDU mixing machine to ensure contact between the contaminated cuttings and bioremediation additives
 - 1.2. Cuttings are combined with an appropriate mixture of ingredients, which is pre-proportioned based on laboratory analysis of the untreated cuttings.
 - 1.2.1. Geozorb – organic solidification
 - 1.2.2. DryLet MBB – bioremediation of hydrocarbons
 - 1.2.3. BioComplete – bioremediation of SAR
2. Stockpile Management:
 - 2.1. Treated, solidified cuttings shall be stored on location in individual well stockpiles
 - 2.2. Stockpiles shall be constructed as tall as practical in order to aid in the retention of warmth within the stockpile thereby increasing microbial activity in lower temperatures
 - 2.3. Leachate in storm water runoff shall be managed through the engineered properties of Geozorb, which functions as a binder and has been shown in laboratory analysis to perform comparably to chemical binders.
 - 2.4. A small earthen berm shall be constructed around the stockpile(s) as a further countermeasure against storm water runoff. Pad site storm water berm is a viable option for containment.
 - 2.5. The stackable consistency and engineered absorbent properties of the solidified cuttings material will form a protective crust layer on the surface of the stockpile. This crust layer helps retain moisture and heat within the stockpile while also protecting the native landscape from windborne contaminated particulate. Care shall be taken by the Operator and all contractors to minimize stockpile disturbance until a properly trained soil sampling technician visits the site.
3. Sampling & Testing:
 - 3.1. The stockpile of treated cuttings will be sampled and tested according to Symmetry Oilfield Solutions protocol and COGCC table 910-1.
 - 3.2. After the cuttings have achieved the threshold limits specified in table 910-1, the treated material will be thin spread on the well site and incorporated into the reclamation fill material.
 - 3.3. A permanent record (one digital PDF and one hard copy) of the laboratory analysis shall be maintained by the Operator.
4. BLM Managed Federal Lease Locations
 - 4.1. Complete the appropriate BLM Sundry Notice Form. Questions and requests for assistance may be directed to Aaron Richter, BLM Natural Resource Specialist, at 719-269-8512.