

State of Colorado
Oil and Gas Conservation Commission



FOR OGCC USE ONLY

Date received
7/28/2014
REM #8582
Doc #1733787

☐ Spill ☐ Complaint
☐ Inspection ☐ NOAV
Tracking No:

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

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): Cuttings Pit Closure

OGCC Operator Number: 10335

Name of Operator: Axia Energy, LLC

Address: 1430 Larimer St. - #400

City: Denver State: CO Zip: 80202

Contact Name and Telephone:

Jess Peonio - jpeonio@axiaenergy.com

No: (720) 746-5212

Fax:

API Number: 05-081-07727-00

County: Moffat

Facility Name: Bulldog #5-31H-790

Facility Number: 428927

Well Name: Bulldog

Well Number: #5-31H-790

Location: (QtrQtr, Sec, Twp, Rng, Meridian): Lot 6, Sec 5, T7N/R90W Latitude: 40.599719 Longitude: -107.511350

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): Water Based Cuttings

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.): Ranching

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.): NA

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

Impacted Media (check):

Extent of Impact:

How Determined:

☐

Soils

☐

Vegetation

☐

Groundwater

☐

Surface Water

REMEDIAL WORKPLAN

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

See attached.

Describe how source is to be removed:

See attached.

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 attached.

FORM
27
Rev 6/99

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REMEDIATION WORKPLAN (Cont.)

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

OGCC Employee: _____

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

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.
See attached.

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:
Sampling underway - Supplemental Form 27 to be submitted with results.

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):
Land treated in accordance with Rule 907.e.2. If Table 910-1 standards can be met in a timely manner, then disposal will be beneficial re-use on the location. If Table 910-1 standards cannot be met, disposal will be at commercial disposal facility.

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: 7-1-14 Date Site Investigation Completed: _____ Date Remediation Plan Submitted: _____
Remediation Start Date: _____ Anticipated Completion Date: _____ 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: Jess Peonio

Signed: [Signature]

Title: Regulatory Manager

Date: 7-9-14

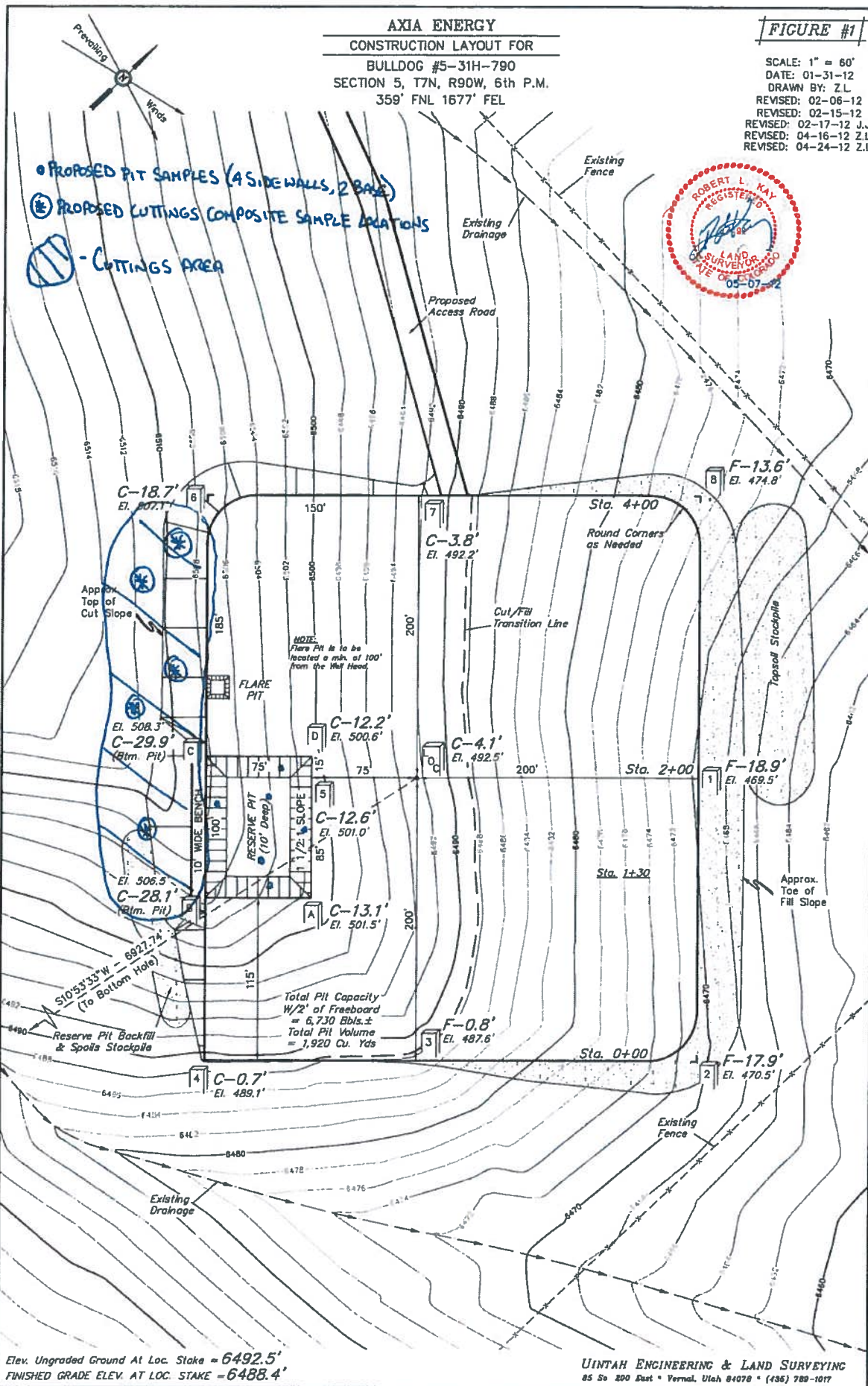
OGCC Approved: [Signature] Title: EPS I Date: 7/10/14

See additional COA's on Rem # DATA entered

Bulldog #5-31H-790 – Facility ID #428927 - Form 27 – Supplemental Cuttings Pit Testing/Evaluation & Reclamation

The subject pit was reclaimed in 2012 without a full sampling/testing protocol being conducted. The cuttings were not buried within the pit which has been confirmed during pit characterization via excavation and soil boring sampling work. Boring and excavation samples have been taken from the walls and bottom of the pit (see attached) and analysis is pending to confirm that no contamination or liner leak occurred. The cuttings were land treated in accordance with Rule 907.e.2 and implemented within the pad/location. Sampling of the cuttings mixture has occurred with analysis pending to confirm that Table 910-1 standards were not exceeded.

Sampling results will be provided when analysis completed to confirm the pit closure was done in accordance with COGCC rules and regulations. If analysis shows remediation is necessary, a supplemental Form 27 will be submitted with remediation plans.





July 7, 2014

James Simpson
40756 State Hwy #13
Craig, CO 81625

Re: Bulldog #5-31H-790 & Bulldog #22-41V-890 - Cuttings Pit Reclamation

Mr. Simpson:

Axia Energy, in an effort to minimize waste, has implemented a testing and beneficial re-use plan for the water based cuttings that were the result of the drilling of the Bulldog #5-31H-790 & Bulldog #22-41V-890 located on your property. All cuttings that were experienced during the oil based mud drilling interval were captured on location during drilling and disposed of at a commercial waste facility.

The testing and beneficial re-use plan for the water based cuttings involves:

- Removal and disposal of the cuttings pit liner
- Soil sampling and laboratory analysis of each of the pit walls as well as the base of the pit – to insure the pit liner was effective
- Mixing and drying of the water based cuttings
- Testing of the water based cuttings mixture against the Colorado Oil & Gas Conservation (COGCC) Table 910-1 stringent thresholds to insure no contaminated soils/cuttings
- When cuttings have been cleared by COGCC for re-use, the implementation/spreading of the cuttings mixture onto the pad surface for re-use

The COGCC requires written surface owner approval for the above plan. By signing below, you confirm your approval of Axia Energy's testing and beneficial re-use plan. Your confirmation of approval is greatly appreciated.

Should you have any questions or concerns with the above plan, please contact me at (720) 746-5212 or Jerry Holder at (970) 290-8909 and a representative of Axia Energy would be happy to meet with you to discuss further.

Thank you,

Jess Peonio
Senior Drilling Engineer & Regulatory Manager

Consent of Surface Owner

Bulldog #5-31H-790/Bulldog #22-41V-890

James Simpson – Simpson Ranch