

Wiepking-Fullerton Energy, LLC

Exploration and Production Waste Management Plan Disposal of Water-Based Bentonitic Drilling Fluids and Associated Drill Cuttings

This document outlines the operational requirements to be followed when burying bentonitic drilling fluids and associated drill cuttings in a drilling pit on non-agricultural land to maintain compliance with the Colorado Oil and Gas Conservation Commission (COGCC) Rule 907.d(3).

The waste generation source and disposal location information covered under this Exploration and Production (E&P) Waste Management Plan are detailed in Table 1. A topographic and aerial photographic map with the waste generation source and disposal location site boundaries is depicted on Figures 1 and 2, respectively. Only water-based bentonitic drilling fluids and associated drill cuttings generated by Wiepking-Fullerton Energy, LLC (Wiepking-Fullerton) will be transported and disposed of at the disposal location. No other E&P waste will be deposited at the disposal location. Any changes made to this E&P Waste Management Plan will be provided to the COGCC via a Sundry Notice.

Drying and Burying in Pits on Non-Crop Land

1. Wiepking-Fullerton will obtain written authorization from the surface owner (if non-Wiepking-Fullerton owned property) prior to transportation and disposal of water-based bentonitic drilling fluids and associated drill cuttings at the disposal location from the source locations. The signed agreement will state that only Wiepking-Fullerton-generated materials will be accepted at the disposal location and all water-based bentonitic drilling fluids and associated drill cuttings will be deposited within a drilling pit located at the disposal location.
2. The water-based bentonitic drilling fluids and associated drill cuttings will be placed into tanks at the source location and sampled and analyzed for compliance with the COGCC Table 910-1 concentration levels prior to being transported to the destination location for drying.
3. Water-based bentonitic drilling fluids and associated drill cuttings will be dried and buried at the disposal location which is designated as non-crop land. The resulting concentrations will not exceed the COGCC Table 910-1 concentration levels, per COGCC Rule 907.d(3).A.
4. A Waste Generation Manifest Log will be generated and maintained for a period of no less than five years after the project completion date for the transportation of the materials from the source location to the disposal location. The Waste Generation Manifest Log will include (at a minimum) the following information:
 - Name of waste source location;
 - Date of transportation;
 - Owner of the material being transported (Operator);

- Transportation company name;
 - Transporter name;
 - Legal description (Township, Range, Section) of the source location;
 - Description and volume of the material being transported; and
- Name and legal description (Township, Range, Section) of the disposal location.
5. Water-based bentonitic drilling fluids and associated drill cuttings being transported from the source location to the disposal location will be deposited in an existing drilling pit at the disposal location which contains water-based bentonitic drilling fluids and associated drill cuttings from the production well at the disposal location.
 6. All records will be available to the COGCC or surface owner upon request.

The resulting concentrations of water-based bentonitic drilling fluids and associated drill cuttings within the drilling pit at the disposal location will be sampled and analyzed for compliance with the COGCC Table 910-1 concentration levels for soils prior to pit closure operations.

7. A COGCC Sundry Notice will be submitted for closure of the disposal drilling pit in accordance with COGCC Rule 907.d(3)A.

Attachments:

Table 1 – Waste Generation Source and Disposal Locations

Figure 1 – Site Location Map

Figure 2 – Site Map

Table 1
Waste Generation Source and Disposal Locations
Wiepking-Fullerton Energy, LLC

Site Type	Site Name	Legal Description	Latitude/ Longitude	Driving Directions
Source Location	Raptor #4	NENE, Sec 18, T10S R55W	39.18405/ -103.58685	Pending
Disposal Location	Raptor #3	SENE, Sec 18, T10S, R55W	39.18042/ -103.58688	HWY 40 & CR 26, south 1.6 miles, west into location

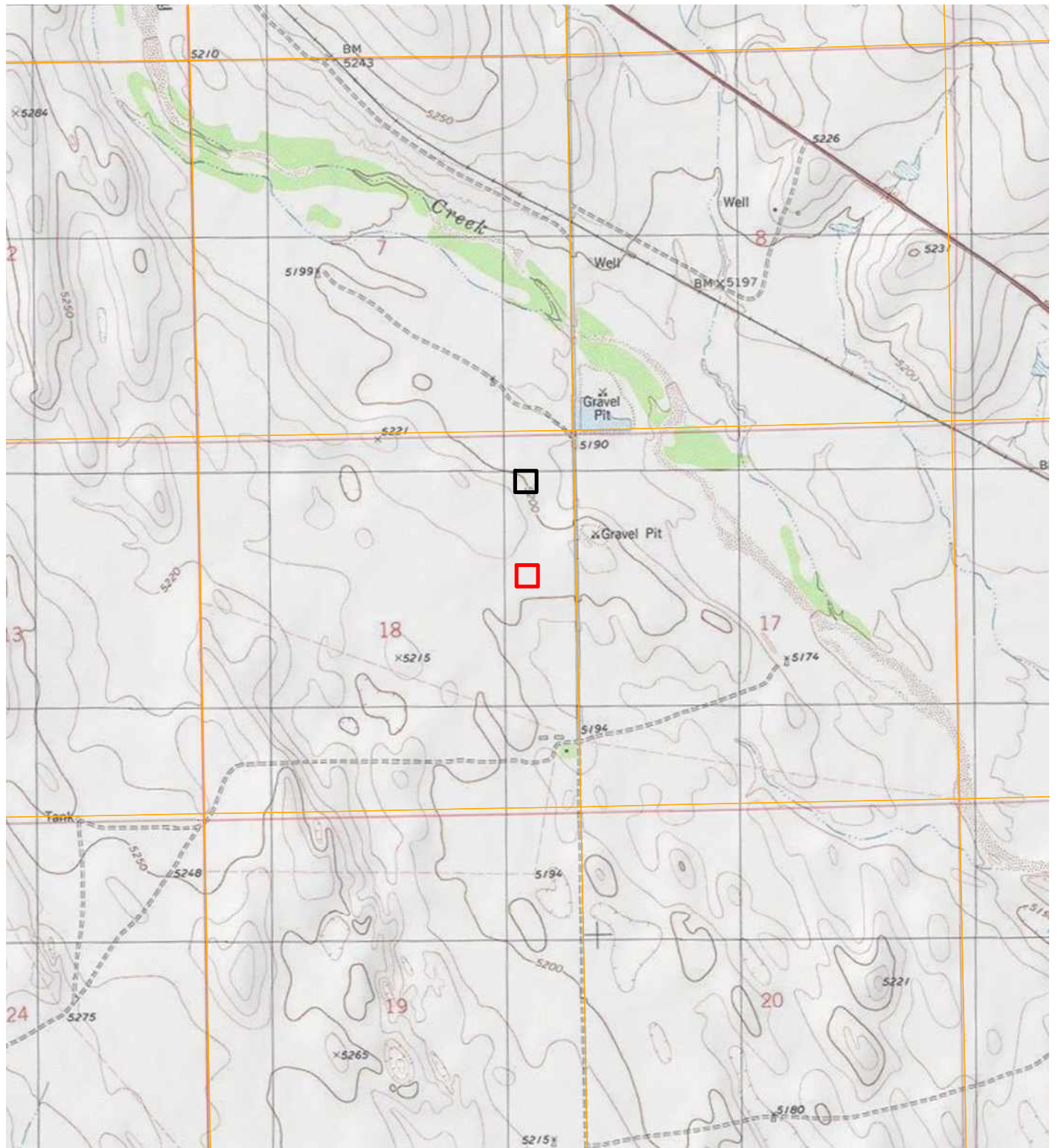


IMAGE COURTESY OF ESRI/USGS

LEGEND

- RAPTOR #3
- RAPTOR #4
- SECTION

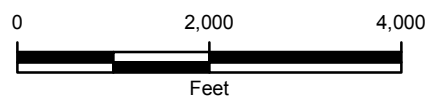
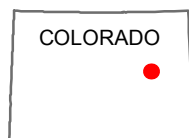


FIGURE 1
SITE LOCATION MAP
E & P WASTE MANAGEMENT PLAN
SEC 18 T10S-R55W
LINCOLN COUNTY, COLORADO
WIEPKING-FULLERTON ENERGY, L.L.C.



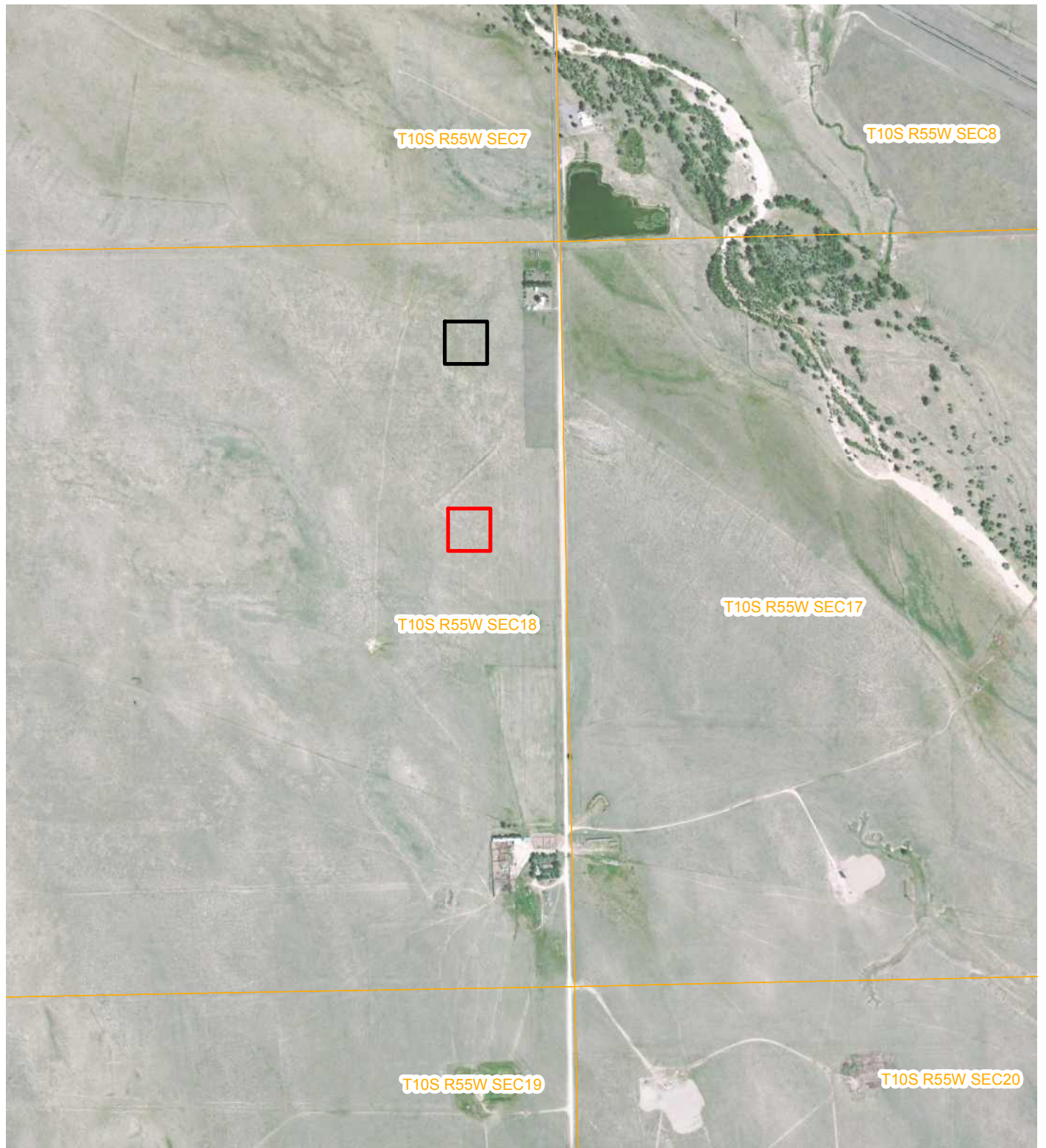


IMAGE COURTESY OF ESRI

LEGEND

- RAPTOR #3
- RAPTOR #4
- SECTION

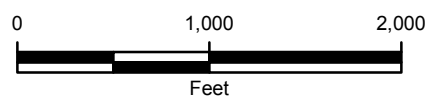


FIGURE 2
SITE MAP
E & P WASTE MANAGEMENT PLAN
SEC 18 T10S-R55W
LINCOLN COUNTY, COLORADO
WIEPKING-FULLERTON ENERGY, L.L.C.

